

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNILEVER BESTFOODS and KIK CUSTOM
PRODUCTS, INC., f/k/a CCL CUSTOM
MANUFACTURING, INC.,

vs.

C.A. No. 01-496-L

TEKNOR APEX COMPANY, et al.,

KIK CUSTOM PRODUCTS, INC., f/k/a
CCL CUSTOM MANUFACTURING, INC.

vs.

C.A. No. 01-511-L

A.T. CROSS COMPANY, et al.

DEPOSITION OF WILLIAM MURRAY,
a witness in the above-captioned cause, taken on
behalf of the Plaintiff Unilever, before Devin J.
Baccari, CSR, at the Law Office of Adler, Pollock
& Sheehan, P.C., One Citizens Plaza, 8th Floor,
Providence, Rhode Island, on March 3, 2010,
scheduled at 9:00 a.m.

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2 1 APPEARANCES 2 3 FOR THE PLAINTIFF UNILEVER BESTFOODS: 4 BAKER BOTTS, LLP 5 BY: CHRISTOPHER DANLEY, ESQUIRE 6 THE WARNER, 1299 PENNSYLVANIA AVENUE, NW 7 WASHINGTON, D.C. 20004-2400 8 202-639-7710 CHRISTOPHER.DANLEY@BAKERBOTTS.COM 9 10 FOR THE PLAINTIFF KIK CUSTOM PRODUCTS: 11 BLEAKLEY PLATT & SCHMIDT, LLP 12 BY: JONATHAN A. MURPHY, ESQUIRE 13 ONE NORTH LEXINGTON AVENUE 14 WHITE PLAINS, NEW YORK 10601 15 914-949-2700 JMURPHY@BPSLAW.COM 16 BLISH & CAVANAGH, LLP 17 BY: KAREN A. PELCZARSKI, ESQUIRE 18 COMMERCE CENTER, 30 EXCHANGE TERRACE 19 PROVIDENCE, RHODE ISLAND 02903 20 401-831-8900 KAP@BLISHCAVLAW.COM 21 22 FOR THE DEFENDANTS TEKNOR APEX, A.T. CROSS, RAYTHEON 23 AND BENJAMIN MOORE: 24 BENIK & ASSOCIATES, P.C. 25 BY: GREGORY L. BENIK, ESQUIRE 931 JEFFERSON BOULEVARD, SUITE 2008 WARWICK, RHODE ISLAND 02886 401-454-0054 GBENIK@JRERI.COM FOR THE DEFENDANT GENERAL CABLE: BLANK ROME, LLP BY: SCOTT E. COBURN, ESQUIRE ONE LOGAN SQUARE, 130 NORTH 18TH STREET PHILADELPHIA, PA 19103-6998 215-569-5362 COBURN@BLANKROME.COM	4 1 INDEX 2 3 WITNESS PAGE 4 WILLIAM MURRAY 5 EXAMINATION BY MR. DANLEY..... 5 6 EXAMINATION BY MR. MURPHY.....191 7 8 EXHIBITS 9 10 NO. DESCRIPTION PAGE 11 (PLAINTIFFS) 12 1 NOTICE..... 5 13 2 BATES NUMBER TA00746..... 20 14 3 BATES NUMBER TA00006..... 20 15 4 BATES NUMBER TA00795..... 20 16 5 BATES NUMBER TA00819..... 20 17 6 TEKNOR APEX RESPONSES TO REQUESTS FOR 18 7 ADMISSION, INTERROGATORIES AND REQUESTS 19 8 FOR PRODUCTION OF DOCUMENTS..... 88 20 9 TEKNOR APEX CO. - HEBRONVILLE WASTE - 21 10 HANDWRITTEN DOCUMENT.....140 22 11 COVER LETTER DATED 2/1/93 TO DEPT OF 23 12 ENVIRONMENTAL PROTECTION FROM LORRAINE 24 13 BRAUNSDORF W/ ATTACHMENTS.....144 25 14 NOTICE OF VIOLATION OF HAZARDOUS WASTE SITE DATED 8/22/85.....152 15 LAB RESULTS.....156 16 RI DEPARTMENT OF ENVIRONMENTAL 17 18 MANAGEMENT BIENNIAL REPORT FOR THE YEAR 19 1999.....160 20 12/10/91 COVER LETTER TO JAMES MCCAUGHEY 21 22 WITH ATTACHED HEBRONVILLE RESEARCH 23 23 LABORATORY ANALYSIS REPORT.....167 24 12/29/95 LETTER TO LAURA SALAMY OF 25 24 TEKNOR APEX FROM THOMAS EPSTEIN OF 25 DEPARTMENT OF ENVIRONMENTAL MANAGEMENT.....177
3 1 2 FOR THE DEFENDANT AVNET: 3 SMITH MOORE LEATHERWOOD, LLP 4 BY: BRADLEY M. RISINGER, ESQUIRE 5 TWO HANNOVER SQUARE, SUITE 2800 6 434 FAYETEVILLE STREET 7 RALEIGH, NORTH CAROLINA 27601 8 919-755-8848 BRAD.RISINGER@SMITHMOORELAW.COM 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	5 1 (Plaintiff's Exhibit Number 1 was so marked.) 2 (Deposition commenced at 9:05 a.m.) 3 WILLIAM MURRAY, 4 Being duly sworn, deposes and testifies as follows: 5 EXAMINATION BY MR. DANLEY 6 Q. Mr. Murray, good morning. 7 A. Good morning. 8 Q. My name's Chris Danley. I represent one of the 9 plaintiffs in this action, Unilever Bestfoods, 10 and we are taking this deposition on the basis of 11 Rule 30(b)6. And before we get into that, I just 12 want to ask you a couple of questions, generally. 13 Have you ever been deposed before? 14 A. Yes. 15 Q. How many times? 16 A. Once. 17 Q. Well, if it's been a while since you've been last 18 deposed, just let me go over a couple rules that 19 will help things go a little quicker and easier. 20 If you need to take a break at any moment, just 21 let us know and we can go off the record. If you 22 don't understand a question that I'm asking, 23 please let me know and I can try to either speak 24 up or reword it as the case may be. 25 A. Uh-huh.

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6 1 Q. Please let me finish asking the question and I'll 2 let you finish answering the question so we can 3 both have the record a little bit cleaner and it 4 will be easier for our court reporter -- 5 A. Uh-huh. 6 Q. -- doing the transcript. I'm trying to think of 7 anything else. 8 Well, can I get you to state your name and 9 your job title at Teknor Apex and how long you've 10 been at the company. 11 A. Name is William Murray. I've been at Teknor 12 Apex now for a little over 31 years. My title is 13 Executive Vice President. 14 Q. And are you executive vice president in charge of 15 one particular department at the company? 16 A. I have areas of concentration, if that's your 17 question. 18 Q. It is. Can you tell me those areas, please. 19 A. Manufacturing, engineering, environmental 20 health and safety, and I also have responsibility 21 for our nylon chemicals and bioplastics 22 divisions. 23 MR. DANLEY: Okay. Let's go off the 24 record for a second. 25 (Off the record.)	8 1 A. I was Director of Engineering. 2 Q. And can you give me the time frame of this job. 3 A. I was Director of Engineering probably from 4 19 -- like '88 or '89 to '91. 5 Q. And when you said you've been at the company for 6 31 years, that means you would have started 7 around 1979? 8 A. June of '78. 9 Q. Can you tell me what job title you held before 10 1988 at Teknor Apex? 11 A. Before that, I was plant manager of our 12 Hebronville plant. 13 Q. And what was the time frame of being plant 14 manager at the Hebronville plant? 15 A. It was probably somewhere, like, '85 or '86 to 16 '88. 17 Q. And what did you do before you were plant manager 18 at the Hebronville plant? 19 A. I was the plant engineer of our Pawtucket 20 plant. 21 Q. And what time frame did you hold this job? 22 A. That was probably '84/'85 time frame, 23 something like that. 24 Q. So about two years? 25 A. Couple of years, yeah.
7 1 Q. How long have you been executive vice president 2 at the company? 3 A. Been executive vice president probably for 4 three or four years, three years, I think. 5 Q. What did you do before becoming executive vice 6 president? 7 A. I was senior vice president. 8 Q. Were you senior vice president of the same areas? 9 A. No. 10 Q. Can you tell me what you were in charge of as 11 senior vice president. 12 A. I was in charge of manufacturing, 13 environmental health and safety, chemicals 14 division and that was it. 15 Q. How long were you senior vice president? 16 A. Probably for five or six years. 17 Q. Can you tell me what your job title was at Teknor 18 Apex before you became senior vice president. 19 A. I was Vice President of Manufacturing. 20 Q. How long were you Vice President of 21 Manufacturing? 22 A. Probably from 1991 until late-'90's. I don't 23 know the exact time. 24 Q. And can you tell me what you did before you were 25 Vice President of Manufacturing.	9 1 Q. And what did you do before you were plant 2 engineer at -- 3 A. I was the production manager of our hose 4 department in Pawtucket. 5 Q. Production manager of the hose department at 6 Pawtucket? 7 A. That's correct. 8 Q. And what was the time frame of this job? 9 A. '83 to '84. 10 Q. What did you do before that job? 11 A. I was assistant plant engineer in Pawtucket 12 Rhode Island. 13 Q. What job responsibilities were involved with this 14 job? 15 THE WITNESS: With which job? 16 MR. DANLEY: With being the assistant 17 plant manager at Pawtucket. 18 A. Assistant plant engineer. 19 Q. Okay. Assistant plant engineer. What 20 responsibilities were involved with that job? 21 A. I was responsible for what I would refer to as 22 the plant facilities, the heating, 23 air-conditioning and things of that nature. 24 Q. Like HVAC issues? 25 A. HVAC issues, compressed air, utilities.

10 1 Q. What was the time frame of this job? 2 A. That would have been, like, '81, '82. 3 Q. Can you remember what you did at Teknor Apex 4 before this job? 5 A. I was project engineer. 6 Q. Project engineer. Was this at the Pawtucket 7 facility? 8 A. Also at the Pawtucket facility. 9 Q. What types of projects would you be responsible 10 for? 11 A. Oh, boy. 12 Q. Let me rephrase. Can you give me a general sense 13 of what your job responsibilities were for this 14 job? 15 A. I would be assigned to a project like, you 16 know, put in a dust collection system and I'd put 17 in a dust collection system. Put in a conveyer 18 and I'd design and install a conveyer. 19 Q. So additions or installations to the plant? 20 A. Installations, capital improvements to the 21 plant maybe is a good way to put it. 22 Q. How long were you project engineer at Pawtucket? 23 A. Two, two to three years. 24 Q. Was this the first job you had with the company? 25 A. First job.	12 1 A. I've certainly spoke with David Yopak. I 2 spoke with Ron Sito. I spoke with Jonathan Fain, 3 Ed Massoud. Probably spoke with some other 4 people in our EHS department, which would be 5 Terry Medley, Lorraine Braunsdorf. I think that 6 would be pretty much it as far as the deposition 7 is concerned. 8 Q. Did you review any documents in preparation for 9 this deposition? 10 A. Yes. 11 Q. Can you tell me what those documents were? 12 A. It was a variety of -- 104(e) that we had 13 submitted, I think, originally in 1999 and then I 14 think there was a second submission or an 15 additional submission in 2002, a variety of 16 depositions that you guys have taken from a 17 variety of people. I can't name them all. 18 Q. Were they drivers? 19 A. They were drivers, yes. I looked at 20 documents, I guess it was a 104(e) submitted by 21 Apex, Incorporated, was included in there. There 22 were some documents from CCL, if I get that name 23 correct -- 24 Q. Yes. 25 A. -- in there. There was a variety of
11 1 Q. Well, your memory's excellent. Can I ask you to 2 take a look at Exhibit 1, that's the deposition 3 notice there in front of you. I'll give you a 4 minute to look through it. 5 Have you seen that document before? 6 A. Yes. 7 Q. Let me just explain the significance of the 8 notice. I know that you said you've been deposed 9 once before. Were you deposed in your individual 10 capacity at that deposition or does that question 11 make sense? 12 A. You'll have to -- 13 Q. Okay. I'll explain the notice and we can go at 14 it from that avenue. The notice, this notice, 15 was served pursuant to Rule 30(b)6 and that rule 16 calls for the witness to be knowledgeable about 17 topics in the notice as it relates to the 18 company. So you would be under an obligation to 19 investigate matters that you may not personally 20 know but that the company would know. 21 And following those lines, did you talk to 22 anybody at Teknor Apex about this deposition 23 notice? 24 A. Yes. 25 Q. Can you tell me who those people were?	13 1 incorporation documents of a variety of different 2 companies included in the package as well. 3 Q. What's the relationship between Teknor Apex 4 Company and Apex, Inc.? 5 A. There's no corporate relationship at all 6 between Teknor Apex and Apex, Inc. 7 Q. So one is not a subsidiary of the other? 8 A. No, one is not a subsidiary of the other. 9 Q. Why were you looking at the 104(e) from Apex, 10 Inc.? 11 A. Because it was in this volume of data that was 12 handed to me -- or volumes of data that was 13 handed to me and it happened to be in there. 14 Q. So going forward in the deposition, I'm going to 15 say "you" and "your" a lot. And when I say those 16 words, those will be referring to Teknor Apex 17 Company. And when I want to ask you personally a 18 question, I will let you know how I'm using that 19 term. So if there's any questions that you have 20 about how I'm using those words, then let me 21 know. But when I use them, unless you hear 22 otherwise, it will be -- when I say "you" and 23 "your," it will be referring to Teknor Apex 24 Company. Does that make sense? 25 A. As long as I -- I don't know.

14 1 THE WITNESS: When you're referring to 2 me, how am I going to know that? 3 MR. DANLEY: I'll say, "in your personal 4 capacity, could you tell me this or that." 5 A. Okay. I understand. 6 Q. When you talked to those people you mentioned 7 just a few minutes ago, in the aggregate, about 8 how long were those conversations? 9 A. I, honestly -- I didn't time any of them. 10 Q. Half a day? 11 A. All told probably more than that, you know, if 12 I added them all together. 13 Q. If you added them all together, what would be 14 the -- 15 A. Probably be the equivalent of a day or more. 16 I, honestly, don't know. 17 Q. How long did it take you to review that mass of 18 documents that was inflicted upon you? 19 A. That took, I don't know, half, three-quarters 20 of the day, something like that, over several 21 days. 22 Q. Did you have any -- did you, as Mr. Murray, have 23 any knowledge of these issues on the deposition 24 notice when you first looked at the notice? 25 A. I'm not sure what you -- help me.	16 1 Q. If you go down to Topic 4, did you have personal 2 knowledge of the presence of hazardous substances 3 in the waste at certain Teknor Apex facilities? 4 A. No. 5 Q. Who did you talk to about that topic? 6 THE WITNESS: About which topic? 7 MR. DANLEY: Topic 4. 8 A. I spoke with our environmental health and 9 safety people. I spoke with people who worked at 10 these different sites during that period of time 11 who may have known what was in the waste to that 12 detail. 13 Q. If you go down to Topic 5, it asks about the 14 identity of the waste carrier from these Teknor 15 Apex facilities during a certain time period. 16 A. Yes. 17 Q. Did you have any personal knowledge of this 18 topic? 19 A. Yes, on Pawtucket; no, on Cumberland; and, 20 yes, on Attleboro. 21 Q. Did you review any documents for this deposition 22 that weren't given to you? 23 A. No. 24 Q. Do you know if there's any material data safety 25 sheets from these facilities for the relevant
15 1 Q. Okay. 2 THE WITNESS: Did I -- 3 MR. DANLEY: No. No, that's -- that's 4 how it works. 5 Q. Could you turn to Page 5 of the deposition 6 notice, please. 7 (Witness complied.) 8 Q. And you see Paragraph 3 where it asks about the 9 content of the waste from certain Teknor Apex 10 facilities -- 11 A. Yes. 12 Q. -- during the relevant period? 13 A. Yes. 14 Q. Did you have any personal knowledge of the 15 content of the waste at these facilities during 16 that time? 17 A. Yes, on A; yes, on C; very limited on B. 18 Q. If you flip to the previous page, Page 4, there's 19 Paragraph Number 2 that asks about the content of 20 the waste. And then if you flip to the next 21 page, it lists the Teknor Apex facilities. Did 22 you have personal knowledge about the content of 23 the waste at these facilities? 24 A. Yes, on Pawtucket; extremely limited on 25 Cumberland; and, yes, on Attleboro.	17 1 time period? And let me say that in here the 2 "relevant time period" is defined, so I'll just 3 point it out now. If you go to Page 4, it's 4 Paragraph 4 at the top. It says, "relevant 5 period," and it goes from January 1st, 1954, 6 through January 1st, 1986. 7 I'll restate my question. Were there any 8 Material Safety Data Sheets at these Teknor Apex 9 facilities for the relevant period? 10 A. No. 11 Q. Why not? 12 A. I believe the Material Safety Data Sheets did 13 not come into being until about 1986. I don't 14 know the specific date on that, but that's 15 approximately the time. 16 Q. Did Teknor Apex have a document similar to this 17 prior to 1986 before these types of documents 18 were required? 19 THE WITNESS: What do you mean by 20 "similar"? 21 MR. DANLEY: Showing the content of the 22 material. 23 A. We may have had documents that told us, you 24 know, like a -- wouldn't certainly tell us 25 anything about the hazardous but may tell us what

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18 1 the different items were, specification, if you 2 will. 3 Q. So there were no documents detailing hazardous 4 substances in these materials or waste before 5 1986 at Teknor Apex facilities? 6 A. That is correct. 7 Q. Did Teknor Apex do anything to distinguish 8 between waste or material that may have contained 9 hazardous substances during the relevant period? 10 MR. BENIK: Objection. You can answer. 11 THE WITNESS: Could you restate then, 12 please. 13 MR. DANLEY: Absolutely. Whenever your 14 attorney objects, you can still answer unless he 15 objects and instructs you not to answer. 16 Devin, can you read back my question, please. 17 (The question was read.) 18 A. Given that the definition of hazardous has 19 changed from time to time, that's a difficult 20 question to answer, because what was hazardous 21 yesterday was not hazardous five years ago, was 22 not hazardous ten years ago. So you're going to 23 need to define better than that. 24 Q. Let's use hazardous substances for this question 25 as meaning hazardous substances as defined at	20 1 called New England Solvents, taking what I would 2 consider reasonable precautions because things 3 weren't as governed by law as much as they are 4 today. 5 Q. Did Teknor Apex treat any other material or 6 waste, other than this waste oil and laboratory 7 waste, in a manner that you just described? 8 MR. BENIK: Objection. You can answer. 9 A. I mean, those are the ones that come to mind. 10 We also had a practice of trying to minimize 11 waste, recycle it back into our product that was 12 a very common practice because that's the 13 business that we're -- that we're in. 14 Q. When did this recycling practice begin? 15 A. Before my time at Teknor Apex, so at least -- 16 I can speak to 31 years, but before that, you 17 know, it was already in practice when I got 18 there. 19 MR. DANLEY: Can we go off the record 20 for a second. 21 (Off the record.) 22 (Plaintiff's Exhibit Numbers 2-5 were so 23 marked.) 24 Q. Mr. Murray, can I just have you look at the first 25 page of Exhibit 3.
19 1 that time. Did Teknor Apex do anything to 2 distinguish waste or material that may have been 3 classified or considered hazardous at that time? 4 A. When you say "may have been considered 5 hazardous," again, I'm not sure what you mean by 6 "may have." I mean, we took reasonable 7 precautions. But at that point in time, 8 hazardous was being defined as we currently all 9 know it today. And for me to answer a question 10 absolutely in that regard is without -- you know, 11 being in that context is impossible. 12 Q. Without being in the context of what? 13 A. Of that time frame. And I do not have 14 absolute recollection of whether hazardous was 15 defined in '85 or '76 or '74 and, therefore, how 16 it was defined. I don't have that recollection 17 sitting here in 2010. 18 Q. What sort of reasonable precautions did Teknor 19 Apex take? 20 A. Taking things like waste oil and sending them 21 to places to be burned or reused as fuel. There 22 was a place locally called, I think, Narragansett 23 Improvement, I think they incorporated it into 24 asphalt, things of that nature. Dealing with 25 laboratory solvents, I think we went to place	21 1 (Witness complied.) 2 Q. Can you identify that document for me, please. 3 A. Do you want me to -- it's Exhibit 3. 4 Q. Okay. Can you tell me why Teknor Apex sent that 5 letter to U.S. EPA? 6 A. Let's see. Looks like this is in response to 7 a request from the U.S. Environmental Protection 8 Agency. 9 Q. And if you look at Exhibit 2 -- 10 A. Yes. 11 Q. -- that's the Apex, Inc., document you probably 12 looked at that we talked about earlier. And the 13 reason I'm using this as an exhibit is because if 14 you turn to Page 763 -- do you see the numbers at 15 the bottom? 16 A. 763. 17 Q. TA763. 18 A. Okay. 19 Q. They actually have the questions here that Teknor 20 Apex responded to in Exhibit 3, so to the extent 21 that we need to look at the questions to 22 understand the answers, then we can look at this 23 document. 24 A. Okay. 25 Q. Exhibit 3, is this one of the documents that you

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22 1 reviewed in preparation for the deposition? 2 A. Yeah. I'm just looking through the first few 3 pages and, yeah, it looks like one of the 4 documents that I reviewed. 5 Q. Who did you talk with about this document? 6 A. With my attorney. 7 Q. I don't want to hear about what you guys talked 8 about. Was there anybody employed or formerly 9 employed by Teknor Apex that you talked about 10 with this document? 11 A. David Yopak. 12 Q. Anybody else? 13 MR. MURPHY: I'm sorry. Who is that? 14 David? 15 A. David Yopak. In preparing for this 16 deposition, I think he's the only one I 17 specifically talked to about this particular 18 document. 19 Q. Can you flip to Page 3 of that document, 20 Exhibit 3. 21 A. If you're going by the TA number -- 22 Q. Let's go by TA numbers. That would be helpful 23 for everybody. TA, ten? 24 A. Ten. Oh, sorry. 25 Q. Your system's better. Engineer.	24 1 A. Thank you. That's correct. 2 Q. Would this also be an accurate description of the 3 operations at those facilities during the 4 relevant period? 5 A. In Central Avenue in Pawtucket, Rhode Island, 6 during the relevant period, we would have been 7 also making garden hose. And for some part of 8 that period, we were making blocks and mats but 9 not all of that period. 10 Q. Making blocks -- 11 A. Blocks and mats, the last thing in that -- 12 well, next to the last thing. At Oak Hill 13 Avenue, during the relevant period, we would have 14 made -- 15 THE WITNESS: And this is answered as 16 Teknor Apex, correct? 17 MR. DANLEY: Correct. 18 A. Okay. As Teknor Apex, which came into 19 existence in 1968, Oak Hill Avenue would be 20 correct. In 20 Industrial Road, we purchased 21 that in January of 1985 -- exactly what was 22 happening previous to that I can't speak to -- 23 but from '85 until that -- until 1999 this is 24 correct. 25 Q. You're not aware of the operations being
23 1 At the top, there's a Paragraph F. And if 2 you look at the other exhibit, it lists the 3 question out F on the TA763 asking at that 4 point -- and this is back in -- oh, let's see, 5 Teknor Apex's response was in 1999. So the 6 question was asking Teknor Apex to describe the 7 nature of its current business at each location, 8 and there's three entries on there, I believe. 9 Can you tell me which cities correspond to those 10 addresses? 11 A. 505 Central Avenue's in Pawtucket, Rhode 12 Island. 330 Oak Hill Avenue is in Attleboro, 13 Massachusetts. And 20 Industrial Road is in 14 Cumberland, Rhode Island. 15 Q. And beside each address, there is a listing of 16 operations being conducted at those plants at 17 that time, correct? 18 THE WITNESS: Could you clarify one 19 thing. Was that responded to as to what 20 operations were going on during the relevant 21 period or at 1999? I just don't recall. 22 MR. DANLEY: Currently. 23 THE WITNESS: Currently? 24 MR. DANLEY: It asks for current 25 operations as of 1999.	25 1 conducted at I'll call it the Cumberland plant 2 before 1985? 3 A. Only of a general nature. I knew they were in 4 the color business, that was the business that we 5 purchased, but I would not know any details of 6 anything that they had done during that period. 7 Q. Do you know the name of the entity that operated 8 this plant before Teknor Apex? 9 A. It was called Custom Color. 10 Q. Did Teknor Apex acquire Custom Color? 11 A. Yes. 12 Q. How so? 13 A. I -- I was not actually involved in that 14 acquisition so -- I know it was purchased by a 15 subsidiary of Teknor Apex called Teknor Color, 16 but that's the extent I know. I don't know much 17 beyond that. 18 Q. Do you know if it was a stock purchase? 19 A. I do not. 20 Q. Do you know if Teknor Apex assumed the 21 liabilities of Custom Color? 22 A. I do not. 23 Q. Who would know? 24 A. I would assume our attorney would know because 25 he probably would know the details of how the

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26 1 purchase was conducted. 2 Q. Are you referring to in-house counsel or outside 3 counsel? 4 A. Outside. 5 Q. Would anybody in the company know? 6 A. Possibly Jonathan Fain. 7 Q. Jonathan Vein? 8 A. Fain. 9 Q. Fain. What's his position at the company? 10 A. He's President and CEO. 11 Q. So that I understand, you were looking at 12 Paragraph F and, for the Pawtucket and Attleboro 13 facilities, you said that the current operations 14 as of 1999 would be applicable to the relevant 15 time period except for the following instances, 16 Pawtucket during the relevant period also 17 manufactured garden hose, blocks and mats; is 18 that correct? 19 A. Yes. 20 Q. And the Attleboro facility there would be no 21 changes? 22 A. That is -- that is correct. I'll go on to say 23 that the Attleboro facility operated as Teknor 24 Apex from 1968 to 1986. That's also true for the 25 Central Avenue facility. It was Teknor Apex from	28 1 of the Pawtucket facility. Can you tell me how 2 many people that facility currently employs? 3 A. I can tell you approximately. I don't know 4 the exact number. 5 Q. I won't hold you to that. Approximately how many 6 people are employed at that facility? 7 A. Somewhere between 5 and 600 people. 8 Q. Do you know how many people were employed at the 9 Pawtucket facility in 1980? 10 A. Essentially -- essentially, the same. 11 Q. Has this facility employed between 5 and 600 12 people since Teknor Apex took over the facility? 13 A. I couldn't speak to 1968 to '78, but from '78 14 until the present, although, the employment's 15 gone up and down and what those people do is 16 different, the overall employment has stayed 17 somewhat steady in that range. 18 Q. Can you tell me about the Attleboro facility and 19 how many people are currently employed there? 20 A. One. 21 Q. Can you tell me how many people were employed at 22 the Attleboro facility in 1980? 23 A. I would say approximately 60 to 70. 24 Q. Can you tell me how many people were employed at 25 the Attleboro facility in 1970?
27 1 1968 to 1986. Previous to that, it was a 2 different entity. 3 Q. What entity was that? 4 A. It was part of Continental Oil previous to 5 that. 6 Q. Do you know how Teknor Apex came into possession 7 of the Pawtucket and Attleboro facilities? 8 A. I know some of those details. 9 Q. Can you share? 10 A. That was an asset purchase. There were some 11 limited liabilities transferred during that 12 purchase related to receivables and things of 13 that nature. 14 Q. Do you know how long the Pawtucket facility was 15 in operation before it was taken over by Teknor 16 Apex? 17 A. I believe that operation started someplace 18 around 1938, '39. Actually, even before that. 19 The building -- some of the buildings were built 20 in 1913, so I suppose it was some sort of a 21 factory at that point in time. 22 Q. Do you know how long the Attleboro facility was 23 in operation before Teknor Apex took over? 24 A. Yes, I believe that was built in 1956. 25 Q. I want to talk for a few minutes about the size	29 1 A. 1970, that's before my time. But it would 2 be -- it would be in that range of 60, 60 to 70. 3 Q. So would it be fair to say that between 1968 and 4 1985, about 60 or 70 employees were working at 5 the Attleboro facility? 6 A. That's correct. 7 Q. Can you tell me anything about the operations at 8 the now Teknor Apex Cumberland plant before 9 Teknor Apex took over? 10 THE WITNESS: Today? 11 Q. Before Teknor Apex took over the Cumberland 12 facility, can you tell me how many people were 13 employed at that facility? 14 A. No, I cannot. 15 Q. Can you tell me how big the Cumberland facility 16 is in terms of square footage? 17 A. I think it's about 40, 50,000 square feet. 18 Q. Was that the square footage of the facility when 19 Teknor Apex took over? 20 A. Yes. 21 Q. Can you tell me how big the Pawtucket facility is 22 in terms of square footage? 23 A. 250, 300,000 square feet total counting all 24 floors. 25 Q. How many floors are there?

30 1 A. Depends on which building you're in. 2 Q. That's a good starting point. How many buildings 3 are there at this facility? 4 A. There are two buildings, but each one is a 5 series of additions upon another one. 6 Q. Let's just start with one building, and pick 7 either one, but can you -- well, actually, tell 8 me of the two buildings, do they serve a certain 9 purpose? 10 A. Yeah. We'll start with the one that is 11 bounded by Central Avenue to the north and 12 Oakland Avenue to the south. 13 Q. Oakland, you said? 14 A. Oakland. And that houses corporate offices, 15 laboratories, vinyl production, TPE production. 16 Q. TPE, can you tell me what that stands for? 17 A. Thermal plastic elastomer. And this is today 18 I'm referring to. Pilot lab, some maintenance 19 operations. 20 Q. Maintenance? 21 A. Maintenance. 22 Q. In what particular sense? 23 A. Maintaining equipment, building. 24 And the second building, I'll say, is bounded 25 to the north by Oakland Avenue and to the south	32 1 A. Yeah, I'm -- 2 Q. Let -- go ahead. 3 A. Two of the buildings are corporate offices. 4 The next building down would house the vinyl 5 production area. The next building down would 6 house maintenance and TPE and laboratory. The 7 next building down would house TPE, bioplastics, 8 which I didn't refer to earlier, and the pilot 9 lab. 10 Q. I have five. Is there one more? 11 THE WITNESS: You're kidding me, right? 12 Q. Corporate's two, the vinyl production's one, the 13 lab maintenance TPE is one, and then the TPE 14 bioplastics and pilot lab is one. 15 A. Okay. When you get to the vinyl area, there 16 are actually -- one building was built, like, in 17 1913 and then there was an addition put on it 18 later on. So it really all -- is kind of all in 19 one. 20 Q. So there's an addition to the vinyl building 21 that's considered as -- 22 A. And I have to tell you, there's a level of 23 precision here that I can -- I'm giving you an 24 idea of what's in the buildings and I'm not 25 precisely getting it down to every single square
31 1 by Hughes Avenue and that building is 2 predominantly a warehouse. There is some 3 maintenance activity in that building and then 4 what we refer to as our bagging operation where 5 we take plastic pellets and put them into bags 6 and boxes and different kinds of containers. 7 Q. You take plastic pellets and put them into 8 different boxes and containers, you said? 9 A. Bags, boxes and a variety of containers. 10 Q. So let's go back to the first building. You 11 mentioned that was bounded by Central and Oakland 12 Avenues? 13 A. Uh-huh. 14 Q. And we're calling it a building, but how many 15 structures make up this building? 16 A. You'll have to give me a moment. About six 17 different structures all connected one to the 18 next, so if you looked at it you would say one 19 building. 20 Q. Connected by a covered walkway or -- 21 A. In some cases, a covered walkway; in some 22 cases, a common wall. 23 Q. For each building, can I ask you to describe the 24 purpose of that building? And you may have 25 already.	33 1 foot of each building and what's in that entity. 2 Q. Let's go to Building 2 -- 3 A. Okay. 4 Q. -- the building bound by Oakland and Hughes. 5 A. Okay. 6 Q. Can you tell me how many structures make up this 7 building? 8 A. Three. 9 Q. And can you give me the purpose of each one of 10 these structures? 11 A. The first one houses our shipping as well as 12 warehousing. The second one has maintenance and 13 warehousing. The third one has warehousing and 14 the bagging operation that I referred to earlier. 15 Q. Can you tell me if the nonstructures that we just 16 discussed were present during the relevant 17 period? 18 A. Some of them were. Some of them were not. 19 Q. Can you tell me which ones were not present 20 during the relevant period? 21 A. The corporate offices were not present during 22 all of the relevant period. In fact, one of the 23 corporate office structures that I referred to 24 was not present at all during the relevant 25 period.

34 1 Q. But one was present? 2 A. The second was partially during part of the 3 relevant period, I should say. 4 Q. When did that come into existence? 5 A. The structure was there. It just wasn't 6 corporate office. 7 Q. Was it being used? 8 A. Yes. 9 Q. As? 10 A. A department store. 11 Q. Can you give me the time frame this building was 12 being used as a department store? 13 A. I can't tell you the beginning, but I believe 14 it turned into the corporate offices, 15 approximately, in 1970. 16 Q. Was the vinyl structure and addition both in 17 existence during the relevant period? 18 A. Rephrase that again. 19 Q. You referred to a vinyl structure in Building 20 Number 1 and an addition. Were both of those 21 structures in existence during the relevant 22 period? 23 A. Yes. 24 Q. Throughout the -- from 1968 until 1985? 25 A. Yes.	36 1 throughout the relevant period? 2 A. From '68 until '85, yes, maintenance was 3 always in that building. 4 Q. What about the TPE production in this building, 5 was that in existence throughout the relevant 6 period? 7 A. No. 8 Q. Do you know when this process started at that 9 building? 10 A. I can't give you an exact date on that. 11 Q. Can you use your best judgment. 12 A. Late-'80's. It might have been after the 13 relevant period that we got into that. 14 Q. All right. Let's go to the last facility -- 15 A. Okay. 16 Q. -- or building at this facility. 17 A. Okay. 18 Q. There's another building, you said, that housed 19 TPE, bioplastics and the pilot lab; is that 20 correct? 21 A. Yes. 22 Q. Was that structure in existence during the 23 relevant -- throughout the relevant period? 24 A. From '68 through '86, yes. 25 Q. What types of operations were performed at this
35 1 Q. Was the structure in this building housing the 2 lab maintenance and TPE departments in existence 3 during the relevant period? 4 A. Yes. 5 Q. Was it the same operations in this building 6 during the relevant period or was this building 7 being used as something else during the relevant 8 period? 9 A. Yes and no for parts of the relevant period. 10 That building from '68 until probably somewhere 11 in the '90's, we did some rubber compounding in 12 that building. 13 Q. Was the lab in existence from 1968 to 1985? 14 A. I don't know about '68. I don't know when 15 that -- it's a structure that's on the roof and 16 I -- I don't know when that was built, but it 17 would have been there in 19 -- 18 THE WITNESS: What did you say, '85? 19 MR. DANLEY: Yes. 20 A. Yeah, it would have been there by -- it 21 certainly was there from '78 to '85. 22 Q. Was the building being used as a maintenance 23 facility during the relevant period? 24 A. Yes. 25 Q. Was it being used as a maintenance facility	37 1 structure during the relevant period? 2 A. Garden hose production and tread rubber 3 production. 4 Q. At what point did those operations stop at that 5 structure and the current operations begin? 6 A. The garden hose production was shut down '92 7 or '93. The tread rubber production was shut 8 down as tread rubber probably about '93 and then 9 continued on in some other rubber compounds until 10 about 2004. 11 As far as the other things coming into 12 existence, I can't give you a definitive date 13 when the pilot lab started in there, but it would 14 have been late '90's or something like that. The 15 bioplastics started a year ago, 2009. And the 16 TPE production also probably started about 17 late-'90's. 18 Q. Let's go to the second building that you 19 mentioned that's bound by Oakland and Hughes. 20 A. Uh-huh. 21 Q. You listed three structures at this building, 22 shipping/warehouse as one structure, 23 maintenance/warehouse as one structure and then 24 warehouse/bagging as one structure; is that 25 accurate?

38 1 A. Yes. 2 Q. For the structure that contained the shipping and 3 warehouse operations, how long has that structure 4 been in existence? 5 A. I know the building was built sometime in the 6 '60's. I don't know what exact year. 7 Q. Do you know if this building, when it was first 8 built, has always been used for shipping and 9 warehouse purposes? 10 A. Yes, it has. 11 Q. For the second structure in this building, the 12 maintenance/warehouse structure, can you tell me 13 when this building or this structure came into 14 existence? 15 A. Also built sometime in the '60's. 16 Q. And was it built in the '60's for the purpose of 17 maintenance and warehouse? 18 A. No. 19 Q. Can you tell me how Teknor Apex first used this 20 structure? 21 A. It was used as warehousing. It also housed 22 our soling buffing operation. 23 Q. Can you tell me when the soling and buffing 24 operation stopped at this structure? 25 A. Again, it would be an approximate of	40 1 at that time? 2 A. Office space and -- office space, laboratory 3 space and production of color concentrates. 4 Q. Can you tell me how many buildings there are at 5 Teknor Apex's Attleboro facility? 6 A. Let's see. One, two, three, four, six. 7 Q. Can you describe the nature of each building at 8 the Attleboro facility presently. 9 A. Presently. I'm just going to -- 10 THE WITNESS: Do you want me to number 11 them? Name them? How do you want me to do this? 12 MR. DANLEY: Why don't we number them. 13 And if it becomes easier to name them, we can 14 name them at a later time. 15 A. Number 1 would be a warehouse, essentially 16 empty at this point in time. Some portion of it 17 is leased. Building Number 2 is completely 18 empty. Building Number 3 is leased to a 19 blacksmith. Building Number 4 has what little 20 maintenance activity we have there plus some 21 storage of equipment for Teknor Apex. Building 5 22 is empty and Building 6 is empty. 23 Q. So let's get back to Building Number 1. 24 A. Okay. 25 Q. Do you know when the warehouse came into
39 1 late-'80's, early-'90's. 2 Q. So from 1968 to the late-'80's or early-'90's, 3 this structure was used as a warehouse and also 4 for the soling buffing operation? 5 A. That's correct. 6 Q. Okay. For the last structure at this building, 7 the warehouse/bagging structure, can you tell me 8 when this building came into existence or this 9 structure came into existence? 10 A. No. 11 Q. Was it in existence in 1968? 12 A. Yes. 13 Q. Was this structure used for warehouse and bagging 14 from 1968 until 1985? 15 A. Yes. 16 Q. Can you tell me how many buildings there are 17 presently at the Cumberland facility? 18 A. One. 19 Q. What's the purpose of that building? 20 A. I have no idea today. 21 Q. Do you know if there was only one building at 22 this facility when Teknor Apex started operations 23 there in 1985? 24 A. Yes. 25 Q. Do you know what the purpose of that facility was	41 1 existence at Attleboro? 2 A. That would have been built about 1985. 3 Q. This second building that's empty, can you tell 4 me what types of operations were there before it 5 became empty? 6 A. Initially, it was a building that housed -- 7 before Teknor Apex, it housed a PVC 8 polymerization operation. 9 Q. Can you tell me what the word is after PVC again? 10 A. Polymerization. 11 Q. Polymerization. Is this the type of operation 12 that was at Building Number 2 in 1968? 13 A. No. 14 Q. In 1968, what type of operations were at Building 15 Number 2? 16 A. Stored equipment. 17 Q. Storage of equipment? 18 A. Storage of equipment and wastewater treatment. 19 Q. At what point was this building used for other 20 purposes? 21 A. It wasn't. 22 Q. So the PVC process that you referred to earlier, 23 those operations were conducted at the building 24 before 1968? 25 A. I think they stopped in 1963.

42 1 Q. So by the time Teknor Apex began operations at 2 the facility -- let me withdraw that question. 3 At any point of Teknor Apex's operation of 4 Building Number 2 at the Attleboro facility -- 5 that's a very long question. 6 For Building Number 2, did Teknor Apex -- to 7 the extent that it was used -- always use that 8 building for storage of equipment and wastewater 9 treatment? 10 A. Yes. 11 Q. At what point did Teknor Apex stop using this 12 building? 13 A. I'm going to have to go back. I gave you an 14 incorrect answer earlier. This building was 15 not empty. I stand corrected. It is probably 16 80 percent empty and there is still a small part 17 of the wastewater treatment operation that's in 18 that building. 19 Q. At any point, did Teknor Apex use Building Number 20 2 for purposes other than storage of equipment or 21 wastewater treatment? 22 A. No. 23 Q. Okay. Let's go to Building Number 3. I'm really 24 interested about this building that's being 25 leased to a blacksmith now. Do you know when	44 1 Q. Was that building used for the purposes of 2 maintenance and storage in 1968? 3 A. No. 4 Q. What was the purpose of Building Number 4 in 5 1968? 6 A. It was for storage of raw materials and it 7 housed our chemicals operation. 8 Q. At what point did the purpose of this building 9 change? 10 A. 2001/2002. 11 Q. In around 2001 or 2002, the purpose of the 12 building then became one of maintenance and 13 storage? 14 A. Not immediately. It became storage and then 15 eventually maintenance. 16 Q. Building Number 5 is currently empty. Can you 17 tell me if this building was in existence in 18 1968? 19 A. Yes. 20 Q. What was the purpose of this building in 1968? 21 A. Warehouse. 22 Q. Can you tell me at what point Teknor Apex stopped 23 using Building Number 5 as a warehouse? 24 A. As a warehouse, probably in and around 1990. 25 Then it was used to store electrical equipment
43 1 this building, Building Number 3, came into 2 existence? 3 A. No, I do not. 4 Q. Do you know if this building was in existence in 5 1968? 6 A. Yes. 7 Q. What was the purpose of this building in 1968? 8 A. Maintenance and boiler house. 9 Q. At any point during the relevant period, did 10 Teknor Apex use Building Number 3 for purposes 11 other than maintenance or boiler house or as a 12 boiler house? 13 A. There were a couple of offices in there for 14 the plant manager. That would be the only other 15 thing. 16 Q. At what point did Teknor Apex stop using this 17 building? 18 A. About five years ago, approximately. 19 Q. Let's go to Building Number 4. You described 20 this building at the Attleboro facility as being 21 used for maintenance and storage; is that 22 correct? 23 A. Correct. 24 Q. Was that building in existence during 1968? 25 A. Yes.	45 1 and we stopped using it a year -- one to two 2 years ago. 3 Q. The last building for this facility that's 4 currently empty, can you tell me if this building 5 was in existence in 1968? 6 A. Part of it was. 7 Q. At what point was there an addition to this 8 building? 9 A. Approximately, 1980. 10 Q. For the portion of the building that was in 11 existence from 1968 to 1980, can you tell me the 12 purpose? 13 A. 1968 to -- would have been analytical lab and 14 color concentrate production. 15 Q. And in 1980, there was an addition to this 16 building, right? 17 A. Yes. 18 Q. What was the purpose of this addition? 19 A. Warehousing and additional color concentrate 20 production. 21 Q. Okay. Let's go back to the Pawtucket facility. 22 You've described two buildings there. 23 MR. BENIK: Excuse me. Can we take a 24 brief break? 25 MR. DANLEY: Yeah, let's go off the

46 1 record. 2 (A recess was taken.) 3 Q. So let's get back to the Pawtucket facility. You 4 mentioned two buildings and multiple structures 5 within each building. Let's focus on the first 6 building, the building bounded by Central and 7 Oakland Avenues and the first structure that I 8 talked about in that building. You said around 9 1970 that building became the headquarters, 10 correct? 11 A. That's correct. 12 Q. Can you tell me what types of waste, generally 13 throughout the relevant period, would have been 14 generated at this structure? 15 A. It was -- during the relevant period of '68 to 16 '70, it was department store, whatever they got 17 rid of. And from '70 to the present, paper for 18 the most part. It was an office. 19 Q. Would you say that the waste that's currently 20 being generated at the structure is the same type 21 of waste that was generated at that structure 22 from 1970 to 1985? 23 A. For the structure that houses the corporate 24 offices, I'd say it would be relatively the same. 25 Q. Do you know how they dispose of the waste	48 1 were six different structures at this building; 2 is that correct? 3 A. Yes. Yeah. 4 Q. So there's a 50-yard cubic -- there is a 50-cubic 5 yard dumpster that services the structures 6 located at Building 1 currently, correct? 7 A. Yes. 8 Q. Okay. Let's go to the second structure that we 9 discussed at Building Number 1. You said this 10 structure housed vinyl operations; is that 11 correct? 12 A. Yes. 13 Q. Can you tell me what types of -- 14 A. Well, let me go back and correct you. I said 15 originally that the first two structures housed 16 the corporate offices. The third structure is 17 what I said houses the vinyl building. 18 Q. You are correct. I was looking at the 19 classifications or purposes of the building. 20 A. Okay. 21 Q. One of the buildings -- one of the structures at 22 the first building in the Pawtucket facility 23 housed the vinyl production, correct? 24 A. That is correct. 25 Q. And there was an addition to this structure that
47 1 generated at this structure? 2 THE WITNESS: Today? 3 MR. DANLEY: Yes. 4 A. Yes. 5 Q. How? 6 A. Most of the paper is recycled and then the 7 remainder of the waste goes into a dumpster. 8 Q. Do you know at what point the headquarters began 9 recycling paper? 10 A. Not the exact date. 11 Q. Can you use your best judgment. 12 A. I would say it had to be sometime in the 13 '90's. 14 Q. Can you tell me how big the dumpster is servicing 15 the headquarters currently? 16 A. The dumpster services more than just the 17 headquarters. 18 Q. Can you tell me how big that dumpster is? 19 A. I think it's 50 cubic yards. 20 Q. What other structures at this building does the 21 dumpster service? 22 A. It services all of what I referred to as 23 Building 1 bounded by Central Avenue on the north 24 and Oakland Avenue to the south. 25 Q. And I believe you said at various points there	49 1 we're treating as a separate structure, correct? 2 A. That is correct. 3 Q. And that also housed vinyl production? 4 A. Vinyl production, and I would add the boilers 5 also in that area. 6 Q. And both the vinyl structure and the vinyl 7 addition structure were in existence in 1968, 8 correct? 9 A. Yes. 10 Q. Can you tell me what types of waste were being 11 generated at the vinyl structure and the vinyl 12 addition structure? 13 A. Predominantly paper, cardboard, some wood from 14 broken pallets, floor sweepings. 15 Q. Can you tell me what types of raw materials were 16 used at the vinyl structure and the vinyl 17 addition structure during the relevant period? 18 A. Resins, fillers, colorants, stabilizers, a 19 variety of additives. 20 Q. I didn't catch the words after stabilizers. Was 21 it various additives? 22 A. Various additives. 23 Q. What types of additives? 24 A. It could be flame retardant. It could be a 25 lubricant. It could be a -- you know, maybe a

50 1 fungicide. Could be a variety of things. I'd 2 have to sit and think for a minute here. 3 Q. Okay. 4 A. A plasticizer. That would -- that would 5 pretty much cover it. 6 Q. The raw materials you described -- you just 7 described as being used at the vinyl structure 8 and the vinyl addition structure, can you tell me 9 how they were received at these structures? Was 10 it in bags or boxes or drums? 11 A. All of the above, plus for the predominant 12 amount of it would have been delivered to us in 13 bulk, in a bulk truck and/or a railcar. 14 Q. Can you give me a sense of how big this bulk 15 truck would be? 16 A. A bulk truck, depending upon what's in it, 17 holds 40 to 45,000 pounds. 18 Q. Can you give me a sense of how many raw materials 19 would be delivered by a railcar? 20 A. One category, resin. 21 Q. And on these railcars and trucks, the raw 22 materials themselves were in bags, barrels or 23 drums, correct? 24 A. No. 25 Q. How were the raw materials stored on the trucks?	52 1 how many trucks would be delivering these raw 2 materials to the vinyl structure and vinyl 3 addition structure? 4 MR. BENIK: Objection. 5 A. That -- that's really hard for me to say. I 6 mean, that -- 7 Q. Can you give me an answer, as of today, how many 8 trucks would be delivering the raw materials to 9 the vinyl structure and vinyl addition structure? 10 A. I cannot give you that answer to any level of 11 precision because a lot of things get delivered 12 to us. We may get 20 trucks each with one skid 13 from each truck. There's no relationship between 14 how many pounds that we make and exactly how many 15 trucks that come in. We may get a truck that the 16 whole truck comes to us. So to answer that 17 question and say how many trucks do we get, 18 that's a hard answer to -- that's a hard question 19 to answer. 20 Q. Generally, throughout the relevant time period, 21 how many pounds of raw materials would be 22 received monthly at the vinyl structure and vinyl 23 addition structure? 24 A. I would -- during that relevant period, 25 probably a number like 60,000,000.
51 1 Were they loose? 2 A. In a bulk truck. It was in -- it would be in 3 a tank. 4 Q. How were they stored on the railcar? 5 A. In the inside of the railcar in a tank. 6 Q. If when the raw materials were stored in bags or 7 drums or boxes, how were they delivered to the 8 structures? 9 THE WITNESS: They were in bags or boxes 10 or -- what was the last one you said? 11 MR. DANLEY: Drums. 12 A. Drums. They would have been delivered in a 13 truck. 14 Q. And you are treating bulk truck and truck as two 15 types of vehicles? 16 A. Yeah. 17 THE WITNESS: This is to the Central 18 Avenue facility we're referring to, correct? 19 MR. DANLEY: Correct. 20 A. Okay. 21 Q. And you're treating -- you, Mr. Murray, are 22 treating trucks and bulk trucks as two different 23 types of vehicles, correct? 24 A. They are two different kinds of things. 25 Q. Generally, during the relevant period each month,	53 1 Q. So the raw materials that were received at the 2 vinyl structure and vinyl addition structure were 3 rosin (sic), fillers, colorants, stabilizers and 4 various additives, correct? 5 A. The first word is resin. 6 Q. Resin? 7 A. Resin, R-E-S-I-N. Not rosin. 8 Q. Correct? Those materials were received at the 9 vinyl structure and the vinyl addition structure 10 throughout the relevant period, correct? 11 A. Correct. 12 Q. Are those materials currently being received at 13 the vinyl structure and vinyl addition structure? 14 A. Yes. 15 Q. Would there be any difference in the chemical 16 composition of these raw materials that are 17 currently being received at the vinyl structure 18 and vinyl addition structure as opposed to the 19 chemical composition of these materials being 20 received at these structures during the relevant 21 time period? 22 A. Generally the same. Specifically, there may 23 be slight differences. 24 Q. Can you expound upon any slight differences that 25 may exist?

54 1 A. Different molecular weight resins, 2 different -- you know, new products come onto the 3 market that may not have been into existence -- 4 in existence during the relevant period. But 5 generally speaking, we are -- we were making PVC, 6 polyvinylchloride, during the relevant period and 7 we make PVC today. 8 Q. And generally speaking, Teknor Apex would use the 9 same raw materials to make those products today 10 as they used during the relevant period? 11 A. Generally speaking. 12 Q. All right. We spoke about the raw materials 13 being shipped to the vinyl structure and the 14 vinyl addition structure. Can you tell me about 15 the waste that was generated at these two 16 structures during the relevant period? 17 A. Yes. As I said earlier, there would be lots 18 of paper, cardboard, wood from broken pallets. 19 Those would be the major components. Floor 20 sweepings, I think, also would be there. 21 Q. Would the bags that contained these raw materials 22 that we just spoke of also be discarded in the 23 dumpster? 24 A. Yes. 25 Q. There was another structure at this building.	56 1 A. I know that there are some that are common. 2 For me to give you specific chemicals, I'm not 3 able to do that. 4 Q. Can you describe -- 5 A. Not capable. 6 Q. Can you describe the fillers in a more general 7 way? 8 A. Yeah, fillers are things like clay, calcium 9 carbonate, and you might buy one in one particle 10 size and one in another particle size depending 11 upon what you're going into. 12 Q. What were the fillers that were received at 13 Structure Number 4 that were different than the 14 fillers that were received at the vinyl structure 15 and vinyl addition structure? 16 A. As I previously answered, you know, I'm not 17 capable of giving you a specific list of what was 18 going into the rubber compounding versus going 19 into the vinyl. I know that some of the fillers 20 are common, some of them are not. That's the 21 extent of my knowledge. 22 Q. The additives received at Structure Number 4, can 23 you describe those? 24 A. Number 1, I didn't say additives in Structure 25 Number 4. I said additives in Structure Number
55 1 You said that this building had rubber 2 compounding operations starting in 1968, there 3 was a lab starting or in existence in use in 1978 4 and it was also used as maintenance starting in 5 1968; is that correct? 6 A. Right. That would have been the fourth 7 structure now we're down to. 8 Q. Yes. Is that correct? 9 A. Yes. 10 Q. Can you tell me the types of raw materials that 11 were delivered to this structure during the 12 relevant period? 13 A. Be rubber, fillers, curatives. That would be 14 the major components. 15 Q. Would these be -- 16 A. Some plasticizers as well. 17 Q. Excuse me. Would these be the same types of 18 fillers that were delivered to the vinyl 19 structure and the vinyl addition structure? 20 A. No. Yes and no. There are some that are 21 common. There are some that are not. 22 Q. Which fillers would be common among these 23 structures -- 24 A. I -- 25 Q. -- during the relevant period?	57 1 3. 2 Q. You said curatives. I'm sorry. I didn't mean to 3 mischaracterize your testimony. From reading my 4 notes far away, I saw additives, but you said 5 curatives, correct? 6 A. That is correct. 7 Q. What types of curatives? 8 A. Predominantly sulfur. 9 Q. And these types of additives were being received 10 at Structure Number 4 during the relevant period? 11 A. That is correct. 12 Q. Can you describe to me what plasticizers are in 13 the sense that they were being received at this 14 structure? 15 THE WITNESS: Structure Number 4? 16 MR. DANLEY: Yes. 17 A. In the case of Structure Number 4, a 18 plasticizer would be what's referred to as either 19 a naphthenic or paraffinic oil. 20 Q. A naphthenic or paraffinic? 21 A. A naphthenic or paraffinic oil. 22 Q. Oil? 23 A. These are naturally occurring oils. 24 Q. For Structure Number 4, can you tell me, 25 generally, the types of wastes that were

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58 1 generated during the relevant period? 2 A. Again, it would be predominantly paper, 3 cardboard, floor sweepings. Again, broken skids 4 occur in a variety of areas. Those would be the 5 major components. 6 Q. Were any of the raw materials received in 7 Structure Number 4 contained in bags, barrels or 8 drums? 9 A. Yes. 10 Q. Were these containers discarded into the dumpster 11 after the raw materials were gathered out of 12 them? 13 A. Yes. 14 Q. So this structure, you said they used 15 plasticizers which are particular types of oil, 16 correct? 17 A. Yes. 18 Q. Were there any spills at this structure involving 19 oil during the relevant period? 20 A. I don't have a specific knowledge of any 21 spills during that relevant period. Did someone 22 drop something on the floor occasionally? I'm 23 sure that was probably likely. 24 Q. Do you know how these spills would have been 25 cleaned up during that period?	60 1 received labels. They would have received 2 cardboard boxes. They would have received wire 3 ties to tie up the hose. They would have 4 received from building Structure Number 3, which 5 housed the vinyl division, plastic pellets. So 6 they wouldn't have received it into the facility, 7 but rather it would have been transferred within 8 the facility. And they would have received PVC 9 scrap. 10 Q. Would the PVC scrap you just mentioned be 11 received from another structure within the 12 building? 13 A. No. 14 Q. Where was the PVC scrap originating from? 15 A. That would either originate from a purchase 16 of -- you know, it's a supplier, I'd say, and/or 17 from our PVC scrap storage in Attleboro. 18 Q. Let's go back to the previous structure just 19 briefly. 20 A. Okay. 21 Q. It's the structure that had the rubber 22 compounding and the lab and the maintenance. 23 A. That's correct. 24 Q. And we talked about the receipt of raw materials 25 at that structure?
59 1 A. Yes. 2 Q. How? 3 A. Typically what we would do is we would take 4 resin, spread it on the material, soak -- and the 5 resin will absorb the oil and then we'd put that 6 into our garden hose production. 7 Q. And when did this type of practice begin in terms 8 of taking the spills and the resin and putting 9 them into the garden hose production? 10 A. I can speak to certainly when I arrived in 11 1978 that practice was already in place. 12 Q. Do you know if that practice was in place prior 13 to 1978? 14 A. I don't have -- I wasn't there, so I can't 15 speak to that. 16 Q. There's a fifth structure at this building. And 17 you said in 1968 to the 1980's or maybe early 18 1990's this structure produced hose and tread 19 rubber, correct? 20 A. That is correct. 21 Q. What types of raw materials were received by this 22 structure? 23 A. Start with garden hose. They would have 24 received fittings -- brass fittings that go on 25 the end of garden hoses. They would have	61 1 A. Yes. 2 Q. During the relevant period, can you give me a 3 monthly general volume of each raw material 4 received at the structure? 5 A. General volume. I'm going to -- this is an 6 approximate. Maybe a million pounds a month. 7 Q. Can you break that down by raw material? 8 A. I can't. 9 Q. Now, let's go forward to the hose and tread 10 rubber facility. Can you give me an approximate 11 monthly volume during the relevant period of raw 12 materials received at this structure? 13 A. Okay. I've only spoken to the hose so far, so 14 I will do that. We probably received somewhere 15 around 1,000,000 pounds of PVC scrap a month, 16 maybe 2,000,000 pounds of PVC pellets that was 17 that internal transfer. I have no idea how much 18 cardboard or labels or fittings. That would be 19 hard for me to put a number on. I'd have to -- I 20 don't know. 21 Q. When you say "labels," are these like the sticky 22 labels we see every day where you write the name 23 on the label and stick it on a -- 24 A. No. 25 Q. -- box?

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62 1 What types of labels are those? 2 A. This would be labels -- if you ever bought a 3 garden hose, comes in a round package and it has 4 a disk on the front, that disk. 5 Q. What's that disk made of? 6 A. Paper. It's like a cardboard. It's thicker 7 than paper. 8 Q. And when you were giving me that answer, you said 9 that you'd only spoken to the hose operations at 10 that structure, correct? We've just so far 11 discussed -- 12 A. Yes. 13 Q. -- the raw materials? 14 A. Yes. 15 Q. Can you tell me the raw materials received at the 16 structure for the tread rubber operation? 17 A. Yes. I mean, that would be rubber, again, 18 some oils that go into rubber, again, curatives. 19 Again, there would be some small amount of 20 fillers. Carbon black would be -- 21 Q. What was the word before carbon black? A small 22 amount of -- 23 A. Small amount of fillers. 24 Q. Fillers? 25 A. Then I said carbon black. Those would be the	64 1 building? 2 A. No, I said less than one. 3 Q. Can you give me an approximate number of oil 4 spills per year at Building Number 1 at the 5 Pawtucket facility? 6 A. I would be guessing. When I say "an oil 7 spill," these would not be reportable spills. In 8 other words, they would not reach some reportable 9 quantity amount, but it may be that someone was 10 carrying something and something spilled. And in 11 the course of a year, I can't even give you a 12 number. 13 MR. BENIK: Don't speculate, Bill. 14 Don't guess and speculate. If you don't know, 15 just don't -- say no. It's -- 16 Q. Do you know how often this 50-yard dumpster 17 was -- let me withdraw that question. 18 Currently, as of today, how often or how 19 frequent is the 50-yard dumpster at this building 20 serviced? 21 A. I think a couple times a week. I don't have 22 absolute knowledge of that. 23 Q. Can you tell me if the raw materials and wastes 24 that are currently being put into the dumpster 25 are the same types of raw materials and waste
63 1 predominant items. 2 Q. Can you give me a general monthly volume of raw 3 materials received at this structure for the 4 tread rubber operations? 5 A. Again, that was probably in the order or 6 magnitude of 1,000,000 pounds per month. 7 Q. What were the oils used for at the tread rubber 8 operations? How were they incorporated into the 9 process? 10 A. They were mixed into the rubber. 11 Q. Were there spills of oil at this structure during 12 the relevant period? 13 A. Again, there were no what we'd refer to today 14 as reportable spills, as far as I am aware during 15 that period of time, but I am sure, again, you 16 have an operation if someone drops something on 17 the floor, likely. 18 Q. Can you tell me today at Building Number 1 of the 19 Pawtucket facility, the one bounded by Central 20 and Oakland Avenues, on average how many oil 21 spills are there a month? 22 THE WITNESS: Today? 23 MR. DANLEY: Yes. 24 A. Probably less than one today. 25 Q. Approximately one oil spill per month at this	65 1 that were being put into the dumpster in the 2 relevant period? 3 A. As I previously answered -- I'll answer 4 again -- that I can say, generally, we were 5 making PVC then. We're making PVC today so, 6 generally speaking, that is the same. We're not 7 making rubber today, we were making rubber then, 8 so that is not the same. To any one specific 9 chemical, I cannot give you an absolute answer. 10 Q. All right. Let's talk about the second 11 building -- 12 A. Okay. 13 Q. -- at the Pawtucket facility. 14 A. All right. 15 Q. The first structure at this building was used for 16 warehouse and shipping purposes starting in 1968, 17 correct? 18 A. Correct. 19 Q. Did this structure receive any types of raw 20 materials for its operations? 21 A. Only internal transfers from other parts of 22 the building. 23 Q. Can you tell me what those internal -- 24 A. Maybe skids, maybe pallets. Excuse me. I'm 25 sorry.

66 1 Q. No problem. Can you tell me what types of wastes 2 were generated at this structure during the 3 relevant period? 4 A. I would say exclusively pallets, cardboard and 5 probably just, you know, normal paper. 6 Q. Let's go to the second structure at this 7 building. It had maintenance and warehouse 8 operations beginning in 1968, correct? 9 A. The second structure? No, that's not what I 10 said earlier. I said earlier today that it has 11 maintenance and warehousing operations and I said 12 in 1968 it had warehousing and buffing 13 operations. 14 Q. You're right. When did the buffing operation 15 cease at this structure? 16 A. I think that was in the late-'80's. 17 Q. Would it be fair to say that the maintenance 18 operations at this structure took the place of 19 the soling and the buffing operations? 20 A. Yes. 21 Q. Oh, let's go back to the first structure of the 22 second building, the building that's bound by 23 Oakland and Hughes. Where did this building send 24 its waste? 25 A. Oakland and Hughes.	68 1 period, that the Pawtucket facility had two 2 dumpsters? 3 A. For some part of that period, there was a 4 dumpster adjacent to Building Number 2. 5 Q. Do you know at what point that dumpster was being 6 used? 7 A. No, I do not. 8 Q. The warehouse operations at Structure Number 2, 9 at the Oakland and Hughes building, were there 10 any types of raw materials that operation used 11 during the relevant period? 12 A. Say that one more time, please. 13 Q. Absolutely. In terms of the warehouse operations 14 at Structure Number 2 at the Oakland and Hughes 15 building -- 16 A. Yeah. 17 Q. -- did that operation use any type of raw 18 material? 19 A. Only what was generated internally. 20 Q. What would that be? 21 A. Sheets of soling, S-O-L-I-N-G. 22 Q. How were sheets of soling used in the warehouse 23 operations? 24 A. They weren't used in the warehouse operations. 25 They were used in the buffing operation.
67 1 Q. Or where did this structure send its waste? 2 A. It had -- well, during that period of time, 3 there was a dumpster located adjacent to the 4 first structure of that building. 5 MR. DANLEY: Can you read that back, 6 please? 7 (The answer was read.) 8 Q. During the relevant time, was this structure 9 sending its waste to the 50-yard dumpster where 10 the first building was sending its waste? 11 A. I can't absolutely say that. You know, all 12 these buildings are connected by tunnels, so 13 possibly. But to say that absolutely, I just 14 don't know. 15 Q. In general, during the relevant period, was there 16 a dumpster that the second building used 17 exclusively? 18 A. There's a second dumpster that was exclusively 19 used by that building but maybe not a dumpster 20 that they used exclusively. 21 Q. How big was that dumpster? 22 A. I do not know. 23 Q. Do you know how often that dumpster was serviced? 24 A. I do not know. 25 Q. So would it be fair to say, during the relevant	69 1 Q. How were they used in the buffing operations? 2 A. They were buffed. 3 Q. What is soling? 4 A. The bottom of your shoe. 5 Q. So do you know, generally, what soling consists 6 of chemically? 7 A. For that period of time -- what it is today is 8 a different story, but what it was then, it was a 9 rubber compound. 10 Q. Do you know what made up that compound? 11 A. Only from a general standpoint that it had, 12 you know, rubber curative, some fillers. 13 Q. Fillers in the sense of clay or calcium 14 carbonate? 15 A. Probably more predominantly clay, in that 16 particular case. 17 Q. And at this structure with the soling and buffing 18 operations, what types of wastes were generated? 19 A. What we would do is we would take a sheet of 20 vulcanized rubber, which we made in the other 21 operation, cure it, then run it through a sander. 22 And as a result of running it through the sander, 23 just like if you put a piece of wood through a 24 sander, you're going to create, in that case, saw 25 dust. In this case, we would create rubber dust.

70 1 Q. How was that rubber dust disposed of? 2 A. It would be put into large cardboard boxes and 3 then sent to the landfill. And some of that, a 4 percentage of it, was recycled back into the same 5 product but not all of it could be recycled. 6 Q. At what point was this dust recycled? 7 A. It -- from my knowledge, it had always been 8 put back in at some certain percentage. And so 9 from '70 -- certainly from '78 onward, that would 10 have been happening. Previous to that, again, I 11 can't speculate. 12 Q. What was the end result of these operations? 13 What product was being made? 14 A. Material that ended up on the bottom of your 15 shoe. 16 Q. And when you say that these sheets of soling were 17 cured, what were they cured with? 18 A. It was cured with the sulfur that was put in 19 in the operation that we spoke about previously, 20 and then you heat it and you have a chemical 21 reaction. 22 Q. Can you tell me what types of sulfurs were being 23 used in the relevant period? 24 A. Well, there's two type of sulfurs called 25 soluble and insoluble sulfur. They're both	72 1 A. PVC compound. 2 Q. What was being warehoused at the structure before 3 PVC compounding? 4 A. I don't know. That structure goes back to the 5 early 1900's. I have no idea. 6 Q. When you say bagging, what does that mean? 7 A. That means taking plastic pellets from a large 8 hopper and putting them into 50-pound bags or we 9 could be putting them into a -- what's referred 10 to as a Gaylord, a large cardboard box 11 approximately four-foot by four-foot and putting 12 them into that large cardboard box. Those are 13 the two major operations. 14 Q. Plastic pellets went into these boxes and bags? 15 A. Correct. 16 Q. Did any other types of substances go into these 17 boxes or bags? 18 A. No. 19 Q. How were these plastic pellets manufactured? 20 A. They were manufactured in the vinyl 21 compounding operation which we referred to 22 earlier. 23 Q. And what types of raw materials -- let me 24 withdraw that question and just tell you what I'm 25 interested in.
71 1 sulfur and that is an element. There's no -- 2 Q. There's no chemical composition? 3 A. No. Going beyond that point in time, you're 4 done, sulfur. 5 Q. Was sulfur ever spilled during these operations 6 during the relevant period? 7 A. I'm sure sulfur dropped on the floor and was 8 swept up. 9 Q. Do you know how these sweepings were disposed of? 10 A. Yeah, floor sweepings would have been put into 11 the dumpster, either the dumpster or into one of 12 these boxes that I just referred to. 13 Q. I have one more structure for the second 14 building. 15 A. Yeah. 16 Q. It contained warehouse and bagging operations 17 starting in 1968 through 1985 and beyond, 18 correct? 19 A. And beyond, I don't think we got to earlier. 20 There was also a PVC compounding operation in 21 that building. 22 Q. And did the PVC compounding take place after 23 1986? 24 A. Yes. 25 Q. What was being warehoused at the structure?	73 1 I'm interested in what types of raw materials 2 were used to go in the plastic pellets. I'm 3 interested in -- and these aren't questions, 4 so -- what types of raw materials were used for 5 the plastic pellets, how the raw materials were 6 processed in the plastic pellets and what sort of 7 waste were generated by this process all dealing 8 with plastic pellets. 9 Now, can you tell me what types of raw 10 materials, during the relevant period, were used 11 to manufacture these plastic pellets? 12 A. Yes, resins, fillers, colorants, plasticizers. 13 I'm not sure what I said earlier. Stabilizers 14 I'm sure I said earlier, fire retardants. 15 Q. When you say "colorants," what does that mean? 16 A. Things that give other things color. 17 Q. Would those be dyes? 18 A. No. 19 Q. What types of chemicals, during the relevant 20 period, would comprise colorants? 21 A. It would either be a color concentrate and/or 22 a pigment. 23 Q. What types of chemicals would comprise color 24 concentrates? 25 A. Color concentrates are made up of a pigment,

74 1 resin, plasticizer, little bit of lubricant. 2 Q. When you say "pigments," what does that mean? 3 A. Pigment. I'm not sure what else to say other 4 than a pigment. 5 Q. Do you know what types of substances make up a 6 pigment? 7 A. In some cases. 8 Q. In the case of pigments being used at the 9 Pawtucket facility, during the relevant period, 10 do you know -- 11 A. Not exhaustively, no. 12 Q. Well, let's talk about what you do know. Can you 13 tell me what types of chemicals would comprise 14 pigments being used at this structure during the 15 relevant period? 16 A. Could be carbon black, could be titanium 17 dioxide are two -- probably the largest pigments 18 used in the world and by us, the two largest 19 ones. 20 Q. When you say stabilizers were used to make these 21 plastic pellets, can you describe what types of 22 stabilizers were being used, during the relevant 23 period? 24 A. Again, not exhaustively. 25 Q. Can you tell me what types of stabilizers that	76 1 we may add things that give things color, may 2 effect its electrical properties, its fire 3 retardancy. There are literally -- you know, we 4 deal with a lot of raw materials. 5 Q. At the Pawtucket facility at this building? 6 A. That is correct. 7 Q. Was flame retardant one of the additives being 8 used for plastic pellets at the Pawtucket 9 facility during the relevant period? 10 A. Yes. 11 Q. Can you tell me what chemicals comprise flame 12 retardant during the relevant period at the 13 Pawtucket facility? 14 A. The major one is and antimony oxide. 15 Q. Can you tell me about any other chemicals 16 comprising flame retardants. 17 A. Antimony oxide is by far the largest one, and 18 I can't tell you the exact chemical composition 19 of every flame retardant. 20 Q. Were lubricants being used as additives for 21 plastic pellets -- 22 A. Yes. 23 Q. For plastic pellets at the Pawtucket facility, 24 during the relevant period? 25 A. Yes.
75 1 were being used at this facility, during the 2 relevant period, that you know? 3 A. Yes. There's some stabilizers -- some -- I 4 would not know at all because they're proprietary 5 formulations, so I have no knowledge of what they 6 are from the supplier. Some are lead-based 7 compounds. Epoxidized soybean oil is a 8 stabilizer of a sort. 9 Q. Any other types of stabilizers? 10 A. Those would be the predominant ones. 11 Q. Any other types of stabilizers that you know 12 about? 13 A. There could be -- there are some that are 14 kept -- sorry about that. Let me go back. Other 15 stabilizers could be -- a calcium zinc stabilizer 16 may be another. 17 Q. And from previous testimony I have here that 18 various additives were used at this structure, 19 but were additives also being used to make these 20 plastic pellets? 21 A. Yes. 22 Q. What types of additives were being used to make 23 these plastic pellets? 24 A. Again, I cannot tell you chemically. I can't 25 give you an exhaustive list. As I said earlier,	77 1 Q. Do you know what types of lubricants were being 2 used -- 3 A. Yes. 4 Q. -- at the Pawtucket facility, during the relevant 5 period? 6 A. Again, not exhaustively, but -- 7 Q. Can you tell me which lubricants, you know, were 8 used at the Pawtucket facility, during the 9 relevant period? 10 A. Calcium stearate, zinc stearate, stearic acid. 11 Q. Was fungicide being used as an additive for 12 plastic pellets at the Pawtucket facility, during 13 the relevant period? 14 A. Yes. 15 Q. Do you know what comprised the fungicide at the 16 Pawtucket facility, during the relevant period? 17 A. Again, no, I don't have specific knowledge of 18 the exact chemical composition of all fungicides. 19 Q. Do you know generally what types of chemicals 20 would comprise this fungicide that was being used 21 at the Pawtucket facility, during the relevant 22 period? 23 A. From a trade name standpoint, something called 24 vinyzene would be a predominant item that we 25 would have used.

78 1 Q. I know this is going to come up, can you spell 2 that for me, please. 3 A. I'll do my best. V-I-N-Y-Z-E-N-E. 4 Q. So these were the predominant raw materials that 5 were used to make plastic pellets at the 6 Pawtucket facility during the relevant period, 7 correct? 8 A. Those are some of the materials. 9 Q. Let's talk about the others. Can you tell me the 10 other materials that were used to make -- the 11 other raw materials that were used to make 12 plastic pellets at the Pawtucket facility during 13 the relevant period? 14 A. I mentioned fillers earlier. 15 Q. What else? 16 A. Plasticizers. 17 Q. What else? 18 A. I think that was everything that I had listed 19 earlier. 20 Q. For fillers, were any other materials used in the 21 relevant period besides clay or calcium 22 carbonate? 23 A. I don't think so. I think that would be 24 pretty much it. 25 Q. For plasticizers being used for pellet production	80 1 A. Yes. 2 Q. Please tell me. 3 THE WITNESS: Please tell you what? 4 MR. DANLEY: Please tell me what types 5 of materials were being used as plasticizers at 6 the Pawtucket facility during the relevant 7 period. 8 A. Okay. In the vinyl operation, we used 9 phthalates. 10 Q. Phthalates? 11 A. Phthalates. 12 Q. Phthalates? 13 THE WITNESS: Do you want me to spell 14 it? 15 MR. DANLEY: Yes. 16 A. P-H-T-H-L-A-T-E (sic). 17 Q. P-H-T-H-L-A-T-E? 18 A. Right. Trimellitates. 19 Q. Would you mind spelling that. 20 A. T-R-I-M-E-L-L-I-A-T-E-S (sic). 21 Q. Let's go off the record. 22 (Off the record.) 23 Q. Can you tell me what other types of materials 24 were being used as plasticizers at the Pawtucket 25 facility during the relevant period to make
79 1 at the Pawtucket facility, during the relevant 2 period, were any other materials used besides 3 oil? 4 A. When you say -- "oil" is a very wide term. 5 Q. My notes aren't crystal clear on this point. You 6 told me earlier that plasticizers as used at the 7 Pawtucket facility during the relevant period 8 were comprised of some type of oil. Can you tell 9 me the type of oil you were referring to? 10 A. I hate to keep on correcting you, but, again, 11 that is not what I said earlier. 12 Q. Oh, well, I certainly don't mean to 13 mischaracterize your testimony. 14 A. Well, you've mischaracterized it numerous 15 times today, so I don't know whether you're 16 trying to lead me down that road or what. But 17 that's -- that's problematic to me, at this 18 point. 19 Q. Can you tell me what types of materials were 20 being used as plasticizers at the Pawtucket 21 facility, during the relevant period? 22 A. Say the question one more time. 23 MR. DANLEY: Can you read that back, 24 please. 25 (The question was read.)	81 1 plastic pellets? 2 A. Adipates. And then as I said earlier, there 3 are some naphthenic and paraffinic oils. 4 Q. Tell me about these naphthenic and paraffinic 5 oils. 6 A. Correct. 7 Q. Am I correct in remembering that you said these 8 were naturally occurring oils? 9 A. Yeah, the -- let me -- 10 Q. Again, I'm sensitive to you thinking that -- 11 believing that I'm doing this deliberately, so 12 I'm not trying to put words in your mouth, but I 13 have never heard of these oils and I'm 14 interested. 15 A. Okay. 16 THE WITNESS: Are we on the record or 17 off the record? 18 MR. DANLEY: That was all on the record. 19 A. Naphthenic and paraffinic oils, I would 20 consider them -- they come out of the ground, 21 and -- they come out of the ground and they get 22 distilled and you get everything from, you know, 23 gasoline to Number 6 crude oil and everything in 24 between. And this is one of, if you will, the 25 cuts that come from that operation versus other

82 1 things that are petro chemicals which are things 2 that are synthesized from other chemicals. 3 Q. Thank you. 4 A. Okay. 5 Q. Can you tell me the process in which these raw 6 materials are incorporated to make the plastic 7 pellets. 8 A. Yes, you -- 9 Q. Please tell me. 10 A. You take the -- typically, you take the dry 11 ingredients. You blend them together. 12 Q. Can I stop you right there. Would the dry 13 ingredients be everything besides the 14 plasticizers? 15 A. For the most part. Nothing is absolute, but, 16 yes, for the most part. 17 Q. Generally speaking. Fair enough. 18 A. Generally speaking. 19 Q. So you take the dry materials and you blend them 20 together. Then what happens? 21 A. Then we introduce the liquid materials, like 22 the plasticizer, blend that in, that gets 23 absorbed into the dry materials, and then we mix 24 them intensively to an elevated temperature 350 25 to 400 degrees Fahrenheit, then we cool that back	84 1 some things get spilled and get swept up from the 2 floor. 3 Q. During the process that you just mentioned where 4 the dry materials were mixed with the oils to 5 make the plastic pellets, what types of wastes 6 were being generated as a part of this process at 7 the Pawtucket facility, during the relevant 8 period? 9 A. To the extent that some of the materials came 10 in bags -- and most of them did not, most of them 11 came in bulk -- we would generate empty bags. 12 To the extent that some of those things came 13 to us in boxes, again, we would generate empty 14 boxes, but typically things would not come in 15 boxes. 16 To the extent some of those things came to us 17 in fiber drums, which is, quite frankly, really 18 rare, we would generate empty drums. And then, 19 like anything else, we would sweep the floor. 20 And if there was dirt there, we would -- we would 21 dispose of the dirt. 22 Q. During the relevant -- 23 A. Any -- 24 Q. I'm sorry. Did I cut you off? 25 A. Any other materials that were generated as a
83 1 down and then we shape it into a pellet by 2 flattening it out into a sheet and then dicing. 3 Q. And these pellets, are they used primarily for 4 packing purposes to make sure some product in the 5 container is not -- 6 A. No. 7 Q. Can you tell me why the pellets are being made? 8 A. They're -- they're in this room. They're wire 9 insulation. They're parts of your automobile. 10 They're, you know, parts of your house at home. 11 They may be your shower curtain. They may be 12 your window blinds, your garden hose, you know. 13 There's hundreds of -- they're -- you know, 14 you're in the hospital, you'd be surrounded by 15 these in the form of tubing and instruments that 16 are used in hospitals, blood bags. 17 Q. Generally speaking, at the Pawtucket facility, 18 during the relevant period, would all of the raw 19 materials make it into the plastic pellets? 20 A. Yes. 21 Q. There would be no instance where any of these raw 22 materials would be spilled, during the relevant 23 period? 24 A. That's impossible. I mean, I'm sure that -- 25 in the course of everyday operations, I'm sure	85 1 result of this would -- if they didn't go into 2 the pellet, they went into our garden hose 3 operation as PVC scrap, which I referred to 4 earlier. 5 Q. And was this PVC scrap, during the relevant 6 period, recycled into garden hose throughout the 7 relevant time period? 8 A. Yes. 9 Q. And the floor sweepings from this process were 10 put in the dumpster during the relevant time 11 period, correct? 12 A. Yes. 13 Q. As a part of the process to make plastic pellets, 14 you said that empty bags, empty boxes and rarely 15 an empty fiber drum would be discarded as a 16 result, correct? 17 A. That is correct. 18 Q. Can you tell me, during the relevant period, what 19 those bags contained? 20 A. Just from a general standpoint. 21 Q. Please tell me, generally. 22 A. Generally, they would contain -- some of them 23 would contain PVC resin, some would -- that we 24 did not otherwise get in bulk. Some would 25 contain fillers that we otherwise did not get in

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86 1 bulk. Some would contain stabilizers, which I 2 referred to earlier. Pigments would also -- 3 excuse me -- in paper bags. Fire retardants 4 would come in paper bags. 5 Q. Is it possible to describe the physical 6 characteristics of these paper bags that were 7 being used during the relevant period, generally? 8 A. Brown paper bags. 9 Q. Were they big bags? 10 A. They were 50-pound bags, for the most part. 11 Not everything a 50-pound, but that's by far the 12 majority. 13 Q. Were they lined with plastic? 14 A. In some cases, yes. 15 Q. Can you tell me in which cases that the bags 16 would be lined with plastic, what types of 17 materials they would be -- they would contain? 18 A. No. I can remember seeing bags that had a 19 liner in them, but I couldn't absolutely tell you 20 which materials were in which bags. 21 Q. Were there any types of markings, generally, on 22 this bag to describe their content? 23 A. Yes. 24 Q. Besides describing the content generally, were 25 there other types of markings on the bag?	88 1 dumpster? 2 A. Yes. 3 Q. Completely empty when they went into the 4 dumpster? 5 A. Yes. 6 Q. There was no residual dust in these bags when 7 they went into the dumpster? 8 A. There probably was some residual dust. 9 MR. DANLEY: Let's go off the record. 10 (Off the record.) 11 (Plaintiff's Exhibit Number 6 was so 12 marked.) 13 Q. Mr. Murray, have you ever seen Exhibit 6 before 14 today? 15 A. Yes. 16 Q. Can you turn to the third page of this exhibit, 17 please. 18 A. Okay. 19 Q. Do you see Request Number 4 at the top of this 20 exhibit? 21 A. Yep. 22 Q. And do you see the response to Request Number 4? 23 A. Yep. 24 Q. Do you have any reason to disagree with the 25 response to Request Number 4?
87 1 A. Name of the company that produced it. 2 Q. Can you remember the name of the company that 3 produced any of these materials for the relevant 4 period? 5 A. Whoa. That's going to be difficult to say 6 because companies change names so frequently. So 7 during that period of time, that would be -- that 8 would be hard for me to sit here and give you a 9 good answer to. 10 Q. Let me give you a couple names to see if they 11 might have been on these bags. Do you remember 12 if the word "Apex" was on these bags? 13 A. Yes, in some cases. 14 Q. And in which cases would the word "Apex" be on 15 the bags? What types of materials? 16 A. As I said earlier, you know, associating the 17 name with what exactly was in the bag -- on Apex 18 I think we bought some clay from a company 19 called -- not Teknor Apex, it was an unrelated 20 company, but I think it was a clay that we were 21 purchasing. 22 Q. Do you remember the name Thomson Chemical being 23 on any of these bags? 24 A. No. 25 Q. Were these bags empty when they went into the	89 1 A. I -- I'm the one that did this, so I admitted 2 to it that there was residual powder or dust, 3 although, I must say I do not know what the 4 difference is between powder and dust. 5 Q. I'm glad you said that because I was going to ask 6 you, as far as Teknor Apex is aware, is there any 7 difference between powder and dust? 8 THE WITNESS: As far as Teknor Apex is 9 aware? 10 MR. DANLEY: Yes. 11 A. No. 12 Q. And you have no reason to disagree with the 13 response to Request Number 4 that discarded bags 14 contain residual powder and dust, during the 15 relevant period? 16 A. No. But, again, I don't know what the 17 difference is between powder and dust. 18 Q. There's no need to belabor that point. 19 At any time, did plastic pellets go into the 20 dumpster at the Pawtucket facility, during the 21 relevant period? 22 A. To the extent they got tied up in the floor 23 sweepings, I'm sure that they would have. 24 Q. When the Pawtucket facility received raw 25 materials, during the relevant period, in empty

90 1 boxes, what would the boxes contain? 2 A. Boxes would -- sometimes they'd take bags and 3 put them in boxes, so that would probably be the 4 predominant. I'm trying to think of something 5 that would have come exclusively in a box. And 6 if it did come in a box, that definitely would 7 have a plastic liner. 8 Q. What was contained in the fiber drums that were 9 received at the Pawtucket facility, during the 10 relevant time period? 11 A. The most common item that would come in fiber 12 drums would be color concentrates. 13 Q. And these are the color concentrates that we 14 discussed previously today? 15 A. Yes. 16 Q. Would there be any residual color concentrates in 17 these fiber drums when the fiber drums were 18 disposed, during the relevant period, at the 19 Pawtucket facility? 20 A. Pretty unlikely. 21 Q. Let's talk about the beads a little bit. Can you 22 tell me how big they were? 23 THE WITNESS: About the? 24 MR. DANLEY: The beads, the pellets. 25 Q. Let me ask you this -- I'll withdraw that	92 1 facility, during the relevant period, for the 2 plastic pellet production? 3 A. Yes. 4 Q. What was contained in these black drums received 5 at the Pawtucket facility, during the relevant 6 period? 7 A. Plasticizers. 8 Q. Would it be fair to describe any of those 9 plasticizers as being a clear-like gel? 10 A. No. 11 Q. Okay. Let's go to the second building of the 12 Pawtucket facility, the one bounded by Oakland 13 and Hughes. 14 A. Okay. 15 Q. Would it be fair to say that the main operation 16 at this building involved the soling and buffing 17 of material, during the relevant period? 18 A. The main operation was really warehousing from 19 a square footage standpoint. 20 Q. From a square footage standpoint, how much square 21 footage would the soling or buffing operations 22 comprise? 23 A. Maybe 20, 30,000 square feet. 24 Q. For -- and this is not a question, this is just 25 where I'm going with it so you have a context,
91 1 question. 2 Are they more properly classified as pellets 3 or beads or does Teknor Apex use one word over 4 the other? 5 A. Pellets. 6 Q. How big were these pellets? 7 A. Typically one-eighth inch either cubes or 8 hexagonally cut or bead. When I say "bead," 9 round, about an eighth of an inch. 10 Q. Generally, during the relevant period, what 11 colors were these pellets? 12 A. Every color that you could ever imagine. 13 Q. Was there one predominant color during the 14 relevant period? 15 A. Certainly black and white are the two most 16 predominant colors. 17 Q. Would black, steel drums be disposed of at this 18 building of the Pawtucket facility, during the 19 relevant period? 20 A. No. 21 Q. At the other building of the Pawtucket facility, 22 were black drums disposed of, during the relevant 23 period? 24 A. No. 25 Q. Were black drums received at the Pawtucket	93 1 like we did with the plastic pellets, that's what 2 I'm interested in. 3 Is it the sheets of rubber that -- the sheets 4 of soling? From your previous testimony, you 5 talked about how there were rubber sheets 6 received at this facility and they were buffed; 7 is that correct? 8 A. Yes. 9 Q. And I'm interested in what was the end product as 10 a result of this process? 11 A. Sheets that went into the production of shoes. 12 Q. Other than these rubber -- other than rubber 13 sheets, what were the other types of raw 14 materials that went into this process? 15 A. The sheets, again, there's probably some 16 cardboard packaging, certainly pallets that 17 were -- that would have been it. 18 Q. And would it be fair to say that the waste 19 generated by this process involved the discarded 20 pallets and boxes and bags -- not bags but 21 discarded pallets, boxes and the dust that was a 22 result of the operations? 23 A. That is correct. 24 Q. And do you know how these wastes were disposed 25 of, during the relevant period, from this

94 1 building? 2 A. Certainly, you know, the broken pallets would 3 have gone in the dumpster. Cardboard waste, 4 cardboard would have gone in the dumpster. The 5 dust would have been either, as I said earlier, 6 either -- to some extent, was recycled. And the 7 remainder would have been put into large 8 cardboard boxes and then those would have been 9 not put in the dumpster but sent to the landfill 10 independently, if you will. 11 Q. Independently of -- 12 A. Independently of the dumpster. 13 Q. Do you know, during the relevant period, where 14 these boxes were disposed of? 15 A. No, I do not. 16 Q. Do you know which waste carrier disposed of these 17 boxes during the relevant time period? 18 A. Not 100 percent, but I am aware that Goditt & 19 Boyer, during that period of time, did take that 20 type of waste. 21 Q. But this waste wasn't necessarily put in the 22 dumpster for Building Number 2, correct? 23 A. That is correct. 24 Q. Can you tell me the different types of colors of 25 the dust, if any, that resulted from this	96 1 that you mentioned at the Pawtucket facility, 2 during the relevant period? 3 A. I think there was one that we would gather 4 scrap metal in. 5 Q. Can you tell me where at the facility this 6 dumpster was located? 7 A. That was also adjacent to what I referred to 8 as Building Number 2. 9 Q. Do you know how often that dumpster was serviced? 10 A. When it got filled. Very irregular because it 11 was just scrap metal as a result of maintenance. 12 Q. Do you know how big the dumpster was? 13 A. No idea. 14 Q. Do you know who serviced that dumpster? 15 A. Whoever had the best price of scrap metal. 16 Q. In you describing what materials you reviewed to 17 prepare for this deposition you mentioned that 18 you reviewed several previous driver depositions, 19 correct? 20 A. That's right. 21 Q. Did you see a reference in there to Tim's 22 warehouse as referring to the Pawtucket facility? 23 A. Yes, I did. 24 Q. Do you know what that means? Do you know -- I'm 25 sorry. Withdraw that.
95 1 operation? 2 A. By far, tan would have been the predominant 3 color and there would have been some black dust 4 as well. 5 Q. And we mentioned this previously, you don't see a 6 difference between dust or powder. Is there one 7 term that you prefer over the other? 8 A. I can -- let me answer it this way. As I 9 answered this deposition, I referred to powders 10 as things as a physical form of a raw material; 11 and I referred to dust as one would refer to dust 12 in your house as a nuisance, if you will, or 13 something to be swept up and thrown away. That's 14 the differentiation I tried to apply as 15 consistently as I could in going through this. 16 Q. Would it be fair to say, then, that you use 17 powder as referencing raw materials and dust as 18 referencing any types of waste generated by these 19 processes? 20 A. Generally speaking, I tried to adhere to that 21 rule as I was going through to make some 22 differentiation because, otherwise, I -- it was 23 very difficult to answer all these things 24 completely and truthfully. 25 Q. Were there any other dumpsters besides the two	97 1 Do you know what the drivers are referring to 2 when they say Tim's warehouse? 3 A. Yes, I do. 4 Q. Can you tell me what that is? 5 A. They're referring to another location that we 6 own in Pawtucket at 90 Mendon Avenue. 7 Q. Were there any structures at 90 Mendon Avenue 8 besides Tim's warehouse? 9 A. The whole area was referred to as Tim's 10 warehouse. That area -- actually, Teknor Apex 11 owns one, two, three -- one, two, three, four, 12 five, there were six structures there in the 13 relevant period that Teknor Apex owned. 14 Q. Can you tell me the purpose of each facility of 15 Tim's warehouse during the relevant period? 16 A. Okay. I'm going to -- again, I'm going to go 17 from north to south in my head here. The first 18 one was warehousing and, during that period of 19 time, that warehousing was leased out to American 20 Insulated Wire. 21 Q. So let me stop you there. During the relevant 22 period, Teknor Apex had no operations in the 23 first structure? 24 A. The first structure, that is correct. 25 Q. And please continue with Structure Number 2.

25 (Pages 94 to 97)

98 1 A. Let me go back. That relevant period would be 2 '68 to '85. Certainly from '78 to '85, that was 3 leased out to American Insulated Wire. From '68 4 to '78, I'll have to say that I don't know 5 whether we were in there or American Insulated 6 Wire was in there. The second structure, again 7 from '78 to '85, nothing was in it. And -- 8 Q. I'm sorry. Did you say from 1968 -- 9 A. From '78. 10 Q. '78. 11 A. I'm sorry. From 1978 to '85, nothing was in 12 it. And, again, I just really can't speak to '68 13 to '78. 14 Q. Can I stop you right there? 15 A. Yeah. 16 Q. So for the first two buildings that we just 17 talked about you have no recollection as to the 18 operations there from 1968 to about 1978? 19 A. No, I do not. 20 Q. Please continue with the third structure. 21 A. The third structure was a warehouse. And, 22 again, during this period of time, it was -- for 23 the most part, it was a warehouse probably in the 24 early portion of that time, probably in '68, 25 maybe into the early '70's there was also some	100 1 A. That would be fine. 2 Q. Besides warehouses, it seems the other activity 3 at this site is some form of plasticizer 4 operations, correct? 5 A. That would have occurred only, probably, from 6 '68 into the early-'70's. It was a very small 7 operation. 8 Q. Do you know why this operation was at this 9 facility? 10 THE WITNESS: Do I know why? 11 MR. DANLEY: Yes. 12 A. No. 13 Q. Do you know, on average, how many employees were 14 at Tim's warehouse during the relevant period 15 annually? 16 A. Half a dozen. 17 Q. How big a facility square footagewise is Tim's 18 warehouse? 19 A. If I add all of those buildings together, you 20 might have 150,000 square feet. 21 Q. Do you know of any dumpsters that were at Tim's 22 warehouse? 23 A. Yes. 24 Q. How many dumpsters were at Tim's warehouse during 25 the relevant period?
99 1 plasticizer production at that facility. 2 Q. At the third facility? 3 A. That's the third one. 4 Q. Do you recall what the time period was where 5 there may have been some plasticizer operations? 6 A. I cannot give that to you specifically, but I 7 know during some portion of that time they would 8 have. The fourth building is a garage that 9 serviced our truck fleet. 10 Q. For the entire relevant period? 11 A. I believe so. The fifth structure housed a 12 locker room in an area where we repaired broken 13 pallets. 14 Q. A locker room for the employees? 15 A. Yeah, for the truck drivers. And then the 16 last structure, I think, what is that, six? 17 Q. Yes. 18 A. Was warehouse during the relevant period, 19 strictly warehouse. 20 Q. So out of the six structures you just mentioned 21 at Tim's warehouse, we'll call it the 90 -- from 22 now on I'll refer to it as the 90 Mendon Avenue. 23 A. There's a variety of addresses there, but the 24 main one is 90 Mendon Ave. 25 Q. I'll refer to that as Tim's warehouse. Okay?	101 1 A. I think just one. 2 Q. Do you know how big that dumpster was? 3 A. 30-yard. 4 Q. Do you know how frequently this dumpster became 5 full during the relevant period? 6 A. No idea. 7 Q. Do you know who serviced this dumpster during the 8 relevant period? 9 A. Most likely Goditt & Boyer, although, we would 10 change haulers occasionally, but Goditt & Boyer 11 would be predominant. 12 Q. In reviewing the driver deposition transcripts 13 for your deposition, did you see a stop at 14 Pawtucket for Teknor Apex that was referred to as 15 Apex dust? 16 A. Yes. 17 Q. Do you know what the drivers were referring to 18 when they called that stop "Apex dust"? 19 A. I do not know what the driver was referring 20 to. I can speculate, but I don't -- I do not 21 know. 22 Q. In your knowledge, was there a stop that fit the 23 description of "Apex dust"? 24 A. Yes. 25 Q. Can you tell me where that location is?

102 1 A. Would have been Building Number 2, as I 2 described earlier. 3 Q. So Building Number 2 for the Pawtucket facility? 4 A. Correct. 5 Q. Were the powders -- and from now, I'm going to 6 use the distinction as "powders" being raw 7 material and "dust" being waste generated as a 8 result of the process. 9 A. Okay. 10 Q. Did any of the powders at the Pawtucket facility 11 have the characteristic of being white but once 12 it came into contact with your skin turning 13 black? 14 A. No. 15 Q. There's no powders that would fit that 16 description? 17 A. No. 18 Q. Is there dust that was generated at the Pawtucket 19 building which was white but once it came into 20 contact with skin turned black? 21 A. No. 22 Q. In general, are there powders that turn black 23 once they touch skin? 24 A. Not that I'm aware of. 25 Q. The dust that was being generated at the	104 1 buildings. Some buildings are empty, are being 2 leased, some buildings didn't house the 3 operations currently or there are current 4 operations there that weren't there in the 5 relevant period. I'm going to do my best here to 6 summarize my notes, but I think maybe a better 7 use of everybody's time is if you turn to one of 8 the exhibits that I gave you. It would be -- I 9 threw away my first page of the exhibit, but it's 10 the Teknor Apex responses to the 104(e) request 11 in 1999. I think it's that big document you 12 have. 13 A. I think it's Number 3. 14 Q. Exhibit 3, yes. 15 A. Exhibit 3. 16 Q. And there is an Appendix C to that and it's 17 stapled together and it should be at the very 18 back, and if you'd just go through all those 19 documents and you'll see stapled sections and the 20 last stapled section is Appendix C. 21 A. Okay. 22 Q. It refers to 330 Oak Hill Avenue, which is the 23 Attleboro facility. And if you turn to Page 24 TA114. 25 A. Okay.
103 1 Pawtucket facility, during the relevant period, 2 was that dust flammable? 3 MR. BENIK: Well, I'll object. You can 4 answer. 5 A. I would say everything is flammable. Any 6 organic material is flammable. These things tend 7 not to be very flammable. You'd have to put a 8 blow torch to it to get it to go. 9 Q. Were the powders that were being used at the 10 Pawtucket -- and we just talked about the dust. 11 A. Yeah. 12 Q. Were the powders being used at the Pawtucket 13 facility, during the relevant period, easily 14 flammable? 15 A. No. 16 MR. DANLEY: Let's go off the record. 17 (A noon recess was taken.) 18 Q. Mr. Murray, thank you for returning. Appreciate 19 it. Can we talk about the Attleboro facility. 20 We discussed in depth the Pawtucket facility and 21 I'll move away from that. So let's discuss the 22 Attleboro facility. 23 A. Okay. 24 Q. You did touch briefly on it earlier today and you 25 said that the Attleboro facility consists of six	105 1 Q. That's where the responses concerning the 2 Attleboro facility start. In Subsection B, 3 there's two processes referred to at the 4 Attleboro facility and when they started and they 5 apparently were ongoing as of 1999. Can you tell 6 me, generally, what raw materials were used for 7 the production of plasticizers at the Attleboro 8 facility starting in 1968 and going to 1985. 9 A. Yes. 10 Q. Please tell me. 11 A. Producing plasticizer, we would use phthalic 12 anhydride. We'd use trimellitic acid, adipic 13 acid, to a lesser extent something called sebacic 14 acid, a variety of alcohols going from -- a 15 variety of alcohols going from C8 to C12, and 16 epoxidized soybean oil. 17 Q. And were these raw materials used continuously 18 for this process from 1968 to 1985? 19 A. When you say "continuously," not all of them 20 were used continuously, but certainly on and off 21 during those periods of time. 22 Q. When you say "on and off," are we -- are you 23 implying that there may be gaps of two or three 24 years between the use of some of these raw 25 materials or just a period of months?

106 1 A. In some cases, yes. 2 Q. And I believe in reference in responding to one 3 of my previous questions just now you may have 4 been looking at Subparagraph E on Page TA114? 5 A. Yes. Yes. 6 Q. Let's go through the raw materials that are 7 listed there so I can get an idea of when each 8 raw material was used. For the alcohols that are 9 listed here, were these used continuously from 10 1968? 11 A. This says C7 to C12. Actually, my memory -- I 12 doubt we used C7 during the relevant period. We 13 have used C7 at that facility, but probably not 14 during that period. But C8 through C12, yeah, 15 they would have been used pretty much 16 continually, maybe missing a month here and 17 there. Phthalic anhydride would have been used 18 continuously. Phthalic anhydride, trimellitic 19 anhydride -- 20 Q. Let me just stop you there. I'm going to butcher 21 this. The phthalic anhydride, was that used 22 continuously? 23 A. Yes, sir. The trimellitic anhydride would 24 have been used continuously. The adipic acid 25 most of the time, but maybe not continuously.	108 1 A. I've certainly been consulted, yes. 2 Q. Do you know if there's any requirement to 3 supplement answers or responses at a later date 4 if information is uncovered? 5 A. I am not that aware of the rules surrounding 6 it -- surrounding it. 7 Q. How would these materials be shipped to the 8 Attleboro facility? 9 A. Okay. Start with some of the alcohols. The 10 alcohols were all liquids. They would have been 11 shipped to us either in a railcar, which would 12 have been the most likely route. Second most 13 likely route would be a tank truck. Phthalic 14 anhydride would have most likely been delivered 15 to us in a railcar predominantly, 90-plus 16 percent. The remainder, probably the next 9 17 percent or so, might have been in a truck and 18 then there might have been as much as 1 percent 19 that might have come to us in a jumbo bag, 20 2,000-pound bag. Maybe that will help you. 21 Q. Thank you. Do you know what the color of this 22 jumbo bag may have been during the relevant 23 period? 24 A. White. 25 Q. Do you know if there would have been any markings
107 1 Sebacic acid not continuously. Glycols, which it 2 says here, continuously, and epoxidized soybean 3 oil probably not continuously. 4 Q. Let's start with the soybean oils and work our 5 way backwards. When you say this was not -- this 6 substance was not used continuously, can you tell 7 me when this substance was used? 8 A. Not exactly, no, sir. 9 Q. For the sebacic acid, you said, that was not used 10 continuously, can you tell me when this product 11 was used or raw material was used? 12 A. No, I couldn't tell you that absolutely. 13 Q. And am I right in remembering that the adipic 14 acid -- 15 A. Yes, sir. 16 Q. -- was not used continuously? 17 A. That would have been used pretty much all 18 during that period of time. Maybe not every 19 month, but continuously. 20 Q. And the alcohol, you said, that your memory is 21 that it was maybe more accurately C8 to C12 22 alcohols instead of C7? 23 A. That is correct. 24 Q. Had you ever assisted in responding to 104(e) 25 requests by EPA for Teknor Apex?	109 1 on this jumbo bag, during the relevant period? 2 A. Probably said phthalic anhydride and possibly 3 the supplier's name and weight. 4 Q. Do you recall the supplier's name of this raw 5 material during the relevant period? 6 A. It could be one of a couple, a company called 7 Koppers, K-O-P-P-E-R-S. It could be Exxon Mobil. 8 Well, it would have been Exxon at that time. I'm 9 sorry. Those are the two that come to mind right 10 now. There were some other suppliers, but it's 11 not coming to mind right now. 12 Q. Would this jumbo bag have been disposed during 13 the relevant period at the Attleboro facility in 14 a dumpster? 15 A. Yes. 16 Q. When you say 9 percent, approximately, of this 17 substance would have been delivered by truck, 18 that's not a tank truck, is it? 19 A. Yes. Yes, it is a tank truck. And those are 20 gross estimates. I'm just saying, you know, just 21 relatively just a small percentage would come in 22 bags, but most of it would come in bulk. 23 Q. Moving on to the trimellitic anhydride, can you 24 tell me how that was delivered to the Attleboro 25 facility during the relevant period?

110 1 A. During that period of time, at the beginning 2 of the relative period, it most likely came in -- 3 although, I was not there, it most likely came in 4 50-pound bags. And from, I would say, mid-'70's 5 on, it would have come in a what I referred to 6 earlier as a jumbo bag. 7 Q. So would the 50-pound bags that these -- that 8 this substance raw material was delivered in up 9 until the mid-'70's, would those bags have been 10 disposed of in the dumpster? 11 A. Yes. 12 Q. Would the jumbo bags of this material have been 13 disposed of in the dumpster as well, during the 14 relevant period, when they were in the jumbo 15 bags? 16 A. Yes. 17 Q. Can we move on to the next raw material, the 18 adipic acid. 19 A. Adipic. 20 Q. Thank you. How was that delivered to the 21 Attleboro facility during the relevant period? 22 A. As far as I know, that was always in a jumbo 23 bag. 24 Q. Can you tell me what happened to the bag after 25 this material was emptied?	112 1 Q. I thought you asked me if I wanted to know, and 2 I'm very interested. 3 THE WITNESS: Are you familiar with a 4 diaper? 5 MR. DANLEY: Am I familiar with a 6 diaper? 7 THE WITNESS: With a diaper. 8 MR. DANLEY: Not intimately for several 9 years. 10 A. Well, that's a nonwoven material. So it's a 11 material like that with a plastic liner. 12 Q. Were there predominant colors of the bags or 13 jumbo bags for this substance? 14 A. White. 15 Q. White? 16 A. White. 17 Q. For the adipic acid, can you describe the color 18 of the jumbo bags these materials were delivered 19 in? 20 A. They would also be white. 21 Q. Let me see if I can ask five questions with one 22 question. Were most jumbo bags of these 23 materials white? 24 A. Yes. 25 Q. Were most bags, 50-pound bags, of these material
111 1 A. That would have been put into the dumpster. 2 Q. Let's back up to the previous substance, and I 3 hate to back up because that means I have to 4 pronounce it again, but the anhydride. 5 A. Yes. Well, there are two anhydrides. 6 Q. I'm sorry. The trimellitic anhydride. 7 A. Yes, sir. 8 Q. This came in bags, correct? 9 A. Bags and jumbo bags. 10 Q. Thank you. Can you describe what the bags looked 11 like? And you said that, I guess, for the -- you 12 call them 50-pound bags. And can you describe 13 what the 50-pound bags looked like? 14 A. It would be a paper bag. In the case of 15 trimellitic anhydride, it would have some sort of 16 either a coating or a plastic liner of some sort. 17 Anhydride means no water, lack of water, so 18 clearly you want to keep it with no water in it. 19 So, therefore, it would be some sort of a lined 20 bag. 21 And when it was in a jumbo bag, jumbo bags 22 are a nonwoven material. Are you familiar with 23 what that is? 24 Q. Please. 25 A. I'm asking you.	113 1 white? 2 A. I don't know. 3 Q. The sebacic acid? 4 A. Yes, sir. 5 Q. Can you tell me what type of container this 6 material was delivered in when it was delivered 7 in the relevant time period? 8 A. I've only seen it in jumbo bags, but this is 9 not a material we used that frequently, so -- 10 Q. Is it glysol (sic) or glycol? 11 A. Glycol. 12 Q. Glycol. Does that word as used in this 104(e) 13 response refer to more than one raw material? 14 A. Yes. 15 Q. Can you give me the separate materials that 16 are -- that come under that word there? 17 A. Certainly not exhaustively. 18 Q. Do your best. 19 A. Okay. There is one material called -- I 20 believe it's 1,3 -- 1,3 butanediol. Another one 21 that was common was -- I think it was 1,4 22 hexanediol. Those are the two most used glycols. 23 In fact, I can't think of a third one offhand. 24 Q. And what types of containers were those two 25 glycols delivered to the Attleboro facility,

29 (Pages 110 to 113)

114 1 during the relevant period? 2 A. I believe in both cases in a tank truck. 3 Q. For the soybean oils? 4 A. Yes, sir. 5 Q. Please tell me how they were delivered to the 6 Attleboro facility, during the relevant period. 7 A. They could have come in in either a tank 8 railcar or, again, a tank truck. 9 Q. For each individual raw material listed in the 10 104(e) response, can you give me an approximate 11 monthly volume of that material as it was 12 delivered to the Attleboro facility? 13 A. No. 14 Q. Can you give me the approximate volume for any of 15 those materials listed? 16 A. Not with any degree of accuracy at all. 17 Q. Can you give me the volumes of these materials 18 delivered to the Attleboro facility as of today? 19 A. Yes. 20 Q. Please do so. 21 A. Zero. 22 Q. I stepped on that one, didn't I? 23 MR. BENIK: Finally got you. 24 Q. At any point from 1985 to present day, were these 25 materials delivered to the Attleboro facility?	116 1 absolutely say it's, probably, seven years. 2 Q. I believe you said that for some of these 3 substances you would know where to go. Where 4 would that be? 5 A. I would know -- 6 Q. I'm sorry. Let me withdraw the question. 7 I believe you said that for some of these 8 substances you would know where you could find 9 information as to the volume. 10 A. I could -- I could not find absolute 11 information. Again, I'd have to speculate, 12 estimate, you know, based upon, you know, what 13 our sales were or something from that facility. 14 But that would be, you know, a lot of guesswork, 15 a lot of estimation. 16 Q. What types of documents would you use to make 17 those estimates? 18 A. I would look at, you know, what our sales were 19 from that facility. 20 Q. Does Teknor Apex have sales records from the 21 Attleboro facility for any of the years from 1986 22 to present day? 23 A. Yes. 24 Q. Do you know which years they would have sales 25 records for?
115 1 A. Yes. 2 Q. After the relevant period? 3 A. Yes. 4 Q. Can you give me volumes for any of these 5 materials as they were delivered to the Attleboro 6 facility, after the relevant period? 7 A. No, I cannot give you exact numbers. I can't. 8 Q. If I wanted to find that information, would that 9 be on documents somewhere? 10 MR. BENIK: For what period? 11 Q. If I wanted to find information on the volume of 12 these materials delivered to the Attleboro 13 facility from 1986 onward, where could I find 14 that? 15 A. We might be able to find some of that. 16 Probably not all of it for that period of time 17 because I doubt we would have retained -- our 18 records retention typically would not go that far 19 for those types of items. 20 Q. How far back does your record retention policy 21 reach? 22 A. Depends on what it is. 23 Q. For substances like this, how far back would the 24 records retention policy reach? 25 A. I would say, probably, at most that I could	117 1 A. No. 2 Q. Would those sales records be an accurate 3 reflection of the sales records from this 4 facility, for the relevant period? 5 A. No. 6 Q. Why not? 7 A. Sales change from year to year, products 8 change from year to year, customers change from 9 year to year. 10 Q. Other than those generalizations, do you have any 11 specific reason why the sales records would not 12 be reflective of products sold during the 13 relevant period? 14 MR. BENIK: Objection to the form. You 15 can answer. 16 A. The way I would answer that is also 17 production changed during that period of time 18 from the standpoint of our ability to produce a 19 given volume of material. 20 Q. In what way did production change? 21 A. It improved. 22 Q. How so? 23 A. Our ability to make these substances in 1968 24 was much slower than what it would have been 25 when -- right before we closed the plant in, you

118 1 know, around 2000 or a little bit there 2 afterwards. So, therefore, the production for 3 the plant would be -- would vary greatly during 4 that period. 5 Q. So what was or were the products being made at 6 the Attleboro facility using the raw materials we 7 just discussed? 8 A. We made plasticizers, a variety of types, as 9 well as -- with the epoxidized soybean oil, we -- 10 what we did was we processed it to give it less 11 odor. 12 Q. So the raw materials that were coming in were 13 used to make plasticizers during the relevant 14 period and also soybean oils being processed, 15 correct? 16 A. Soybean oil was being I'll call it deodorized. 17 Q. Why was the oil being deodorized? 18 A. So that it was more appropriate for the end 19 use that we were going to use it for. 20 Q. And what was the end use? 21 A. To make plastic PVC compounds. 22 Q. Was PVC being made at the Attleboro facility 23 using the deodorized oil? 24 A. No. 25 Q. Where was the deodorized oil being shipped to to	120 1 you have to do something with. Also, there is 2 a -- what is called filter cake is produced in 3 the filtering of the plasticizer at the end of 4 the operation. 5 Q. So it would be fair to say that that filter cake 6 and the water would be the two main waste streams 7 as a result of the plasticizing process? 8 A. Correct. 9 Q. Were there, during the relevant period, any 10 spills of raw materials during this process at 11 the Attleboro facility? 12 A. Yes. 13 Q. What was spilled? 14 A. I can't -- I'm sure things were spilled. I 15 know things were spilled. I can't tell you 16 exactly what items were spilled. 17 Q. Do you know how the spills were cleaned up? 18 A. There may be in a variety of ways. There may 19 be -- have spilled in the tank farm, in which 20 case a lot of the spill went onto the ground. It 21 was just soil, which we've since gone through a 22 lot of remediation efforts for, so that would be 23 one thing. The other thing is we would pump them 24 back up again to the extent that we could without 25 getting dirt in it and we would make what we
119 1 make the PVC? 2 A. To one of the Teknor Apex vinyl compounding 3 facilities. 4 Q. Would that include the vinyl facility in 5 Pawtucket? 6 A. Yes, it would. 7 Q. And am I accurate in stating that the soybean oil 8 had nothing to do with the production of the 9 plasticizers? 10 A. You are correct. 11 Q. Thank you. So for the other raw materials 12 received to make the plasticizers, and I'm 13 putting aside the soybean oils, for the other 14 products, can you tell me how those were blended 15 or processed to make the plasticizer? 16 A. Yes. 17 Q. Please do so. 18 A. Making a plasticizer you take an acid or an 19 anhydride, you combine it with an alcohol, you 20 blend them together, you raise the temperature 21 and a chemical reaction occurs which produces the 22 plasticizer and water. 23 Q. What are the waste streams that are a result of 24 this process? 25 A. Well, the water is certainly something that	121 1 refer to as OGAP. 2 Q. What does "OGAP" stand for? 3 A. OGAP stands for off grade alcohols and 4 plasticizers. 5 Q. Were there any spills elsewhere during this 6 process that occurred during the relevant period? 7 A. Not that wouldn't have ended up either in our 8 wastewater treatment plant, ended up on the 9 ground and, you know, obviously causing issues 10 there and/or whatever else was left would have 11 gone back into our operation as OGAP. 12 Q. And when you say "on the ground," would that mean 13 on the ground outside the building? 14 A. On the ground outside the building. 15 Q. For the raw materials that were used in this 16 process, during the relevant period -- and I may 17 have asked you this, so I apologize if -- just 18 let me know if I did. 19 For the raw materials that were used for this 20 process of plasticizers at the Attleboro 21 facility, during the relevant period, do you know 22 the approximate monthly volume? 23 A. Of raw materials during that period? As I 24 said earlier, it would have varied during that 25 period of time. In the -- in total, we would

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122 1 have been using in the late-'70's to '80's 2 probably a million to a million-and-a-half pounds 3 per month. Previous to that, it would be a 4 number less than that, but I don't know the 5 specific number. 6 Q. In the 104(e) response for Attleboro, there's 7 another process that's referred to in Paragraph B 8 on Page TA114. It is described as the production 9 of color concentrates. Do you see that? 10 A. Yes, sir. 11 Q. Can you tell me the types of raw materials that 12 were used from 1970 to 1985 as a part of this 13 process? 14 A. PVC resin, plasticizers, lubricants, pigments, 15 stabilizer. Those would be the main items. 16 Q. Can you tell me how the PVC resin was shipped to 17 the Attleboro facility during the -- from 1970 to 18 1985? 19 A. In a railcar. 20 Q. Do you know the approximate monthly volume of PVC 21 resin that would have been received at the 22 Attleboro facility from 1970 to 1985? 23 A. It would be about 300,000 pounds a month. 24 Q. Can you tell me how the plasticizer was delivered 25 to the Attleboro facility during the relevant	124 1 A. I think that's -- it might have been zinc 2 stearate, but stearic acid is the predominant 3 one. 4 Q. How would were of these lubricants then delivered 5 to the facility? 6 A. In a paper bag. 7 Q. Can you describe the paper bag for me? 8 A. 50-pound brown paper bag, typically. 9 Q. And were these paper bags discarded once the 10 material was taken out of them? 11 A. Yes. 12 Q. And were the paper bags disposed of in the 13 dumpster? 14 A. Yes. 15 Q. Was there any residual powder from these 16 materials in the paper bags when they were 17 disposed of in the dumpster at the Attleboro 18 facility during the relevant period? 19 A. Yes. 20 Q. Can you tell me what types of raw materials would 21 have comprised the multiple pigments that were 22 shipped to the Attleboro facility during the 23 relevant -- when I say "during the relevant 24 period," for this it's 1970 to 1985. 25 A. Much like the answers earlier, I can't give
123 1 period? 2 A. Through a pipe. 3 Q. Where did the pipe originate? 4 A. From the plasticizer facility. 5 Q. The plasticizer facility at Attleboro? 6 A. Yes, sir. 7 Q. Were there ever any spills as a result of the use 8 of this pipe? 9 A. Yes. 10 Q. How were those spills cleaned up? 11 A. The only one that I'm aware of is it was 12 cleaned up as a part of a remedial action because 13 it spilled onto the ground. 14 Q. Do you know the approximate monthly volume of 15 plasticizer being sent to the Attleboro facility 16 for this process? 17 A. Probably 150,000 pounds a month. 18 Q. You refer to lubricants as types of raw materials 19 that would have been used for the production of 20 color concentrates. 21 A. Yes. 22 Q. Can you please tell me what types of lubricants 23 were used from 1970 to 1985. 24 A. The normal lubricant is stearic acid. 25 Q. Are there any other types of lubricants?	125 1 you an exhaustive list, but the most predominant 2 pigment would have been carbon black followed by 3 titanium dioxide and then a variety of other 4 color pigments. 5 Q. Can you name any of the other variety of color 6 pigments? 7 A. Colors? Every color you can imagine, red, 8 yellow, blue, green, pink, violet, whatever color 9 you can think of. 10 Q. And how were these pigments delivered to the 11 Attleboro facility? 12 A. In paper bags. 13 Q. Were they 50-pound paper bags? 14 A. Yes, sir. 15 Q. Were the paper bags disposed of in the dumpster 16 at the Attleboro facility during -- from 1970 to 17 1985? 18 A. After we emptied the materials from them, yes, 19 they were disposed of in the dumpster. 20 Q. Can you say that one more time. 21 A. After we had taken the materials out of them, 22 they were disposed of in the dumpster. 23 Q. Was there residual powder in these bags in the 24 dumpster? 25 A. Yes.

126 1 Q. Please tell me how these raw materials were 2 processed in order to make the color 3 concentrates. 4 A. Okay. Resin and plasticizer, stabilizer and 5 lubricant were added to a blender, blended 6 together. That was then dropped to a what we 7 refer to as an intensive mixer and the pigment 8 was added at that point in time. It then went to 9 a mill where it was made into a flat ribbon, if 10 you will, and then it was size reduced into a 11 pellet. 12 Q. So pellets were the end result of this process? 13 A. Yes, sir. 14 Q. Would these be the same types of pellets that 15 were being produced in the Pawtucket facility? 16 A. Yes. Actually, there's two forms of finished 17 product. There was a pellet and what we refer to 18 as instex, I-N-S-T-E-X. 19 Q. What is instex? 20 A. That is we take a pellet and we freeze it with 21 nitrogen and then smash it and it turns into an, 22 if you will, a fine particle. 23 Q. Other than the paper bags can you tell me the 24 types of waste streams that were generated as a 25 result of this process?	128 1 facility from 1970 onwards, correct? 2 A. Correct. 3 Q. Can you give me the -- please give me the volume 4 of stabilizers that was used for this process at 5 the Attleboro facility during the relevant 6 period. 7 A. Again, I can't give you that number exactly, 8 but we would make about 700,000 pounds a month of 9 color concentrates, and the stabilizer portion of 10 that may be 2 to 3 percent. 11 Q. Let's use the 700,000-pound monthly production, 12 generally, of color concentrates as a base, and 13 you said of that number 2 or 3 percent of that 14 amount would be stabilizers. What amount of that 15 volume would be PVC resin? 16 A. Probably, maybe, a third. 17 Q. What amount of that volume would consist of 18 pigments? 19 A. Somewhere in the 25 to 30 percent range. 20 Q. What amount of that volume would be the 21 lubricants? 22 A. Less than 1 percent. 23 Q. After adding up these materials, it roughly comes 24 to, say, about 75 percent. Can you tell me what 25 the remaining percentage would be comprised of?
127 1 A. Certainly cardboard, broken skids, floor 2 sweepings could have all been generated from that 3 facility. I'm talking about the color facility 4 right now. 5 Q. Yeah, the color concentrates. 6 A. Yes, sir. 7 Q. Would pellets also have been mixed up in floor 8 sweepings during the relevant period? 9 A. Yes, sir. 10 Q. When you refer to stabilizers as being one of the 11 raw materials that is used in the color 12 concentrates production, what type of stabilizers 13 were you referring to? 14 A. The stabilizers could be, as I said, calcium 15 zinc. They could be lead stabilizers. Those 16 would be the two most predominant stabilizers 17 that would have been used. 18 Q. In what form, physical form, would these 19 stabilizers be in? 20 A. Powder. 21 Q. What would the color of the powder be? 22 A. Both cases white. 23 Q. And all the bags that contain the raw materials 24 for the production of color concentrates were 25 disposed of in a dumpster at the Attleboro	129 1 A. There may be -- well, certainly plasticizer's 2 one. I don't know if I've given you all exact 3 numbers, so I don't know if it's all going to add 4 up to 100, but plasticizer would be in there. 5 That would be in there probably at a number of 15 6 to 20 percent, and then the rest is error. 7 Q. For the production of plasticizers, can you tell 8 me the approximate monthly volume of plasticizers 9 being produced at this facility from 1968 to 10 1985? 11 A. That would have -- as I said earlier, that 12 would have varied dramatically from 1968 to 19 -- 13 THE WITNESS: What did you say? 14 MR. DANLEY: '85. 15 A. '85. It would have been -- I don't know what 16 it would have been in 1968. By 1985, we would 17 have been producing somewhere in the neighborhood 18 of a million to a million-and-a-half pounds a 19 month. 20 Q. Would the percentage of these raw materials used 21 for the production of plasticizers have remained 22 pretty much constant? 23 THE WITNESS: During what time period? 24 MR. DANLEY: During the relevant period. 25 A. No. That's what I said earlier. In 1968, I

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130 1 don't know what that number was. I know it would 2 have been much less than what it was in 1985. I 3 don't have a number for you. By 1985, we were 4 producing somewhere around a million, a 5 million-and-a-half pounds a month. 6 Q. Even though there were differing amounts of the 7 plasticizer being produced throughout the 8 years -- 9 A. Yes. 10 Q. -- would the correlation of raw materials used to 11 make the plasticizer have remained constant? 12 A. Yes. 13 Q. Can you go through the list of raw materials on 14 the 104(e) response and estimate the percentage 15 of each material as it goes into the plasticizer? 16 A. I couldn't -- I couldn't do that because it 17 would depend on what plasticizers we would make. 18 That would change during that period of time. 19 Q. Do you know what types of plasticizers were being 20 made at the Attleboro facility starting in 1968? 21 A. Yes, I do. 22 Q. Please tell me. 23 A. Phthalates, trimellitates, adipates, 24 sebesates, that's what we talked about, 25 epoxidized soybean oil, which is really not a	132 1 Attleboro facility. 2 Q. Do you know the general number of dumpsters that 3 were at the Attleboro facility, during the 4 relevant period? 5 A. Yes. 6 Q. Please tell me that number. 7 A. It was four or five. 8 Q. How big were these four or five dumpsters at the 9 Attleboro facility? 10 A. A variety of sizes. 11 Q. Do you know the variety or -- 12 A. There were a couple that were the eight-yard 13 dumpsters. There might have been one 30-yard 14 dumpster. 15 Q. Were there any dumpsters larger than 30 yards? 16 A. Not that I recall. 17 Q. Would these dumpsters be servicing the different 18 structures at the Attleboro facility? 19 A. Yes, sir. 20 Q. Going back to your previous testimony, you 21 identified the six buildings or six structures at 22 the Attleboro facility. One of these 23 buildings -- and I have it listed as Building 24 Number 6, which is currently empty -- 25 A. Yes, sir.
131 1 plasticizer. 2 Q. So what you have just mentioned there is actually 3 plasticizers? 4 A. Those are plasticizers. Trimellitates, 5 adipates, sebesates and phthalic are 6 plasticizers. 7 Q. Let's take one of those as an example. Did you 8 refer to one of the plasticizers as being a 9 trimellitate? 10 A. Trimellitate, yes. 11 Q. Can you tell me what types of raw materials would 12 make that plasticizer? 13 A. Trimellitic anhydride and then you would take 14 an alcohol, which may be a C8 alcohol which would 15 be 2, ethylhexanol or C9 alcohol which would be 16 isononyl alcohol, I-S-O-N-O-N-Y-L, isononyl 17 alcohol. You would take one of those alcohols 18 and the trimellitic anhydride and you would make 19 a plasticizer. That would be an example. 20 Q. Do you know how many dumpsters were at the 21 Attleboro facility, during the relevant period? 22 A. Not exactly. 23 Q. What does that mean? 24 A. It means that I don't know the precise number 25 of the number of dumpsters that would be at the	133 1 Q. -- but from 1968 to 1980 that -- part of that 2 building was used as an analytic lab and for 3 color production; is that right? 4 A. That is correct. 5 Q. Do you know the size of the dumpster that was 6 servicing that structure? 7 A. That's where the 30-yard dumpster was. 8 Q. What types of wastes were being generated by 9 analytic lab when it was in operation? 10 A. They would have generated some plasticizers 11 because they might have made a test batch of 12 plasticizer, which we then put into the OGAP that 13 I referred to earlier. 14 They also would have -- they might have had 15 some waste solvents or reagents from whatever 16 they were doing in the analytical lab from doing 17 reactions. 18 Q. Do you know what happened to the waste solvents? 19 A. I know some of them went to New England 20 Solvents, at least during the '80's. Previous to 21 that, I would not know. 22 Q. Can you turn to the next page of this document. 23 It's Page TA115. 24 A. Yes. 25 Q. On Subsection B of this page --

134 1 A. Yeah. 2 Q. -- it lists certain waste names, solid waste, 3 waste oil, on and on. 4 A. Uh-huh. Yeah. 5 Q. Do you know how the waste oil was disposed of 6 from this facility during the relevant period? 7 A. I know that some went to Narragansett 8 Improvement. Again, I think that was 9 incorporated into asphalt at that time. I know 10 some went to a -- some sort of a nursery where 11 they burned it and used it for heat. Those are 12 the two that I was aware of. 13 Q. What are the time frames of oil being sent to the 14 nursery and to the asphalt production? 15 A. The asphalt production, I think that happened 16 mostly during the 1980's. And I think the other 17 one -- I'm not sure if it was concurrent with 18 that or previous to that. 19 Q. Do you know where this type of oil was sent 20 before 1980? 21 A. No. 22 Q. Do you know where any of the waste mix lab 23 solvents that are listed in the subparagraph, do 24 you know where they were sent before 1980? 25 A. No, I do not.	136 1 disposed of, the waste carrier pumped them from 2 the drums to their truck? 3 A. That's my recollection, yes. 4 Q. At any time, during the relevant period, was oil 5 disposed of from the Attleboro facility in drums? 6 A. Again, I cannot absolutely say. 7 Q. And the analytic lab was in operation starting in 8 1968, right? 9 A. As Teknor Apex, yes. 10 Q. Can you turn to Page TA119 in this document, 11 please. 12 MR. MURPHY: 119? 13 MR. DANLEY: Yeah, 119. 14 Q. Do you see Subparagraph T at the top? 15 A. Yes, I do. 16 Q. And solid waste is in the column, the first row 17 under "Waste Name"? 18 A. Yes. 19 Q. If you go across that row, it says, "Scheduled as 20 the method to request pick up." What does that 21 mean? 22 A. I don't know. I didn't answer this, so I'd be 23 speculating. 24 Q. Let me back up to Page TA114. 25 A. Okay.
135 1 Q. After 1980, when they were sent to different 2 places, in what types of containers were they in? 3 A. What I'd refer to as a lab pack. 4 Q. Can you tell me what that means? 5 A. Typically what they've done there, a lot of 6 the times we'll have a half of a bottle of 7 something and then that in turn goes into a 8 container -- I've seen both plastic containers 9 and metal containers -- and then they're sealed 10 and then they're taken off by the disposal 11 company. 12 Q. Would these be box-like structures, these 13 containers? 14 A. More like pail-like structures. 15 Q. What about the oil, what types of containers were 16 they disposed in after 1980? 17 THE WITNESS: After 1980? 18 MR. DANLEY: Yes. 19 A. I'm trying to remember. When Narragansett 20 Improvement came, I don't know if they took -- 21 I'm not sure if they took drums or whether they 22 came and pumped out drums. I think the latter 23 because, if I remember, they came with a truck 24 and they would pump out drums into the truck. 25 Q. So they were stored in drums. But when they were	137 1 Q. Subparagraph B, again, we talked about the two 2 processes here, production of plasticizers and 3 production of color concentrates. Are those 4 production lines still ongoing at the Attleboro 5 facility? 6 A. No. 7 Q. When did they stop? 8 A. Color concentrates stopped about nine months 9 ago, June of 2009, and plasticizers, I think I 10 said earlier, 2001 or 2002. I just -- I don't 11 have an exact date in my head. 12 Q. For the production of plasticizers from 1968 to 13 June 2009, generally were the raw materials that 14 were used the same throughout? 15 THE WITNESS: For the production of 16 plasticizers from -- 17 MR. DANLEY: From 1968 to June 2009. 18 A. Number 1, we didn't make plasticizers until 19 2009. It was color that we made until 2009. 20 Q. I'm sorry. I'm looking at the response here and 21 it says, "Production of plasticizers commenced in 22 1968." 23 A. That is correct. 24 Q. And it ceased in June 2009? 25 A. No. This is 1999 that you're reading right

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138 1 now. 2 Q. I know I'm reading from this document for 1968, 3 but you just said that the production of 4 plasticizers stopped in June 2009, correct? 5 A. If I did say that, I'll -- let me correct 6 myself. Plasticizers were made from 1968 until 7 about 2001 to 2002. I don't know the exact day 8 we stopped making plasticizers. 9 Q. And I may have wrote that down wrong in my notes. 10 I have the production of color concentrates 11 ceased around 2001 or 2002. 12 A. Yeah, color concentrates stopped in June of 13 2009. 14 Q. That may have been my fault. I may have written 15 that down wrong. 16 A. Okay. 17 Q. For the production of plasticizers at the 18 Attleboro facility from 1968 to approximately 19 2001 or 2002, were the same types of raw 20 materials used? 21 A. Generally speaking, yes. 22 Q. For the production of color concentrates from 23 1970 to June 2009, were the same types of raw 24 materials used? 25 A. Yes.	140 1 Q. Do you know why there was an explosion? 2 A. Not precisely. 3 Q. Do you know generally why there was an explosion? 4 A. Yes. 5 Q. Why? 6 A. Because of a leak in a sight glass, S-I-G-H-T. 7 Q. Sight glass? 8 A. Right. 9 Q. What's a sight glass? 10 A. Something so you can see the level inside of a 11 tank. 12 Q. Thank you. 13 (P A U S E) 14 MR. DANLEY: Can we go off the record. 15 (Off the record.) 16 (Plaintiff's Exhibit Number 7 was so 17 marked.) 18 Q. Mr. Murray, can you take a look at this document, 19 please. 20 A. Yes. 21 Q. Have you ever seen this document before? 22 A. No. 23 Q. There's initials in the top right corner, "RKM." 24 Do you see that? 25 A. Yes.
139 1 Q. And would the dust generated as a result of these 2 two production lines have been in the dumpster at 3 the Attleboro facility? 4 A. Using the definition of dust that we discussed 5 earlier that -- you know, floor sweepings, 6 general stuff that's -- you know, ends up in a 7 building, yes, that would have ended up in the 8 dumpster. 9 Q. And would powder throughout this time period that 10 was used in both production lines have been in 11 the dumpster? 12 A. No. 13 Q. Would bags containing residual powder have been 14 in the dumpster as a result of the production of 15 these two products at the Attleboro facility? 16 A. Yes. 17 Q. Oh, let me ask you this: Were there two 18 explosions at the Attleboro facility? 19 A. There was one explosion at the Attleboro 20 facility. 21 Q. When was that? 22 A. I believe it was 1963. 23 Q. Before Teknor Apex owned or operated the 24 facility? 25 A. That is correct.	141 1 Q. Does that refer to anybody you know? 2 A. Yes. 3 Q. Who? 4 A. Richard McKeen (phonetic spelling). 5 Q. Who is Richard McKeen? 6 A. He was an engineer that worked for us. 7 Q. Do you know why he would make this chart? 8 A. No. 9 Q. After looking at this chart, does that seem like 10 an accurate description of the waste generated at 11 the Attleboro facility at that time? 12 A. You will have to give me a few more minutes. 13 Q. Please take your time. 14 MR. BENIK: Well, I'll object to that. 15 I mean, if you want to go through this line by 16 line, but I'm not going to let him answer it 17 generally because there's too much information 18 here. So I'll instruct him not to answer. It's 19 an improper question, and I object to the form. 20 If you want to go through each and every waste 21 stream, that's perfectly fine, Chris, but I'm not 22 going to let him answer generally about this 23 document that he's only seen for the first few 24 moments. I mean, this is just too much 25 information, that's an unfair question and --

142 1 MR. DANLEY: I don't think it's an 2 unfair question. I think it's perfectly proper 3 to ask him to review the document and point out 4 inconsistencies as far as he's aware. 5 MR. BENIK: I'm going to instruct him 6 not to answer. 7 MR. DANLEY: Well, that's improper. You 8 can instruct him not to answer on the grounds of 9 privilege, but not on the grounds that you don't 10 like the question. 11 MR. BENIK: It's more than -- I object 12 on the form. I object on the prejudicial nature 13 of the question. I instruct him not to answer. 14 Do what you want. 15 MR. DANLEY: Maybe we can get the number 16 of the magistrate and call him. 17 MR. BENIK: Go ahead. 18 MR. DANLEY: Okay. Let's go off the 19 record. 20 (Off the record.) 21 (A recess was taken.) 22 Q. Mr. Murray, you've had a chance to review Exhibit 23 Number 7, correct? 24 A. Yes. 25 Q. As you are aware, did you see anything on Exhibit	144 1 Generated" for that row -- 2 A. Yes. 3 Q. -- what would be a more accurate number for 1985? 4 A. I understand. I would think a number in the 5 order of 100 to 200 pounds would be more 6 accurate. 7 Q. Per day? 8 A. Per day. 9 (Plaintiff's Exhibit Number 8 was so 10 marked.) 11 Q. Mr. Murray, can you look through this document 12 and tell me if you've ever seen this before. 13 (Witness complied.) 14 A. I've seen the cover letter before, but I'm not 15 sure that I have seen this attachment. 16 Q. I'm going to ask you a few questions about the 17 attachment and see if that -- 18 A. Certainly. 19 Q. -- conforms with your memory. Can you turn to 20 the second page of the attachment. 21 (Witness complied.) 22 Q. The first paragraph of this page starts off, "As 23 part of the recent consent decree." Can you see 24 that? 25 A. Yes.
143 1 Number 7 that is inconsistent with your 2 knowledge? 3 A. Yes. 4 Q. Can you please tell me where you saw those 5 inconsistencies? 6 A. When it says dust collector, from two dust 7 collectors in color department, it says amount 8 400 pounds per day, I would -- I don't agree with 9 that number. That does not look like a realistic 10 number to me. And it says -- 11 Q. Excuse me. Go ahead. 12 A. And it says -- I think it says in that final 13 column of that same row -- I'm not sure I would 14 know what that first word is, may be discarded, 15 maybe decapped. That was not discarded. That 16 material was taken from those dust collectors and 17 was put into our garden hose activity, so I 18 disagree with that. The naphthalene in drums, 19 although, I am aware that naphthalene was used at 20 that facility prior to it being Teknor Apex, I'm 21 not aware of drums of naphthalene being at that 22 site when it was Teknor Apex or in 1985. Those 23 would be the things that I think are -- 24 Q. So for the dust from the two dust collectors and 25 color department, for the column, "Amount	145 1 Q. If you go down to the next paragraph, the 2 paragraph states that there are eight listed 3 chemicals that are used at this facility; is that 4 correct? Do you see that? 5 A. Yes, I see that. 6 Q. Is that right as of that time frame? 7 A. I do not know. 8 Q. You don't know that in 1993 eight listed 9 chemicals were used at the Attleboro facility? 10 A. I can tell you whether certain chemicals were 11 used. Whether or not they were on a list in 12 1993, I could not tell you. 13 Q. If you go down to the last paragraph of this 14 page, the first sentence says, "the plasticizer 15 production occurs in Production Line Number 1." 16 Do you see that? 17 A. Yes, sir. 18 Q. Was that the plasticizer process we were talking 19 about earlier? 20 A. Yes, it is. 21 Q. If you go down further in the paragraph, it talks 22 about -- it states that there were four 23 reportable chemicals that were used in this 24 production unit. Do you see that? 25 A. Yes, I do.

146 1 Q. Were those chemicals being used as a part of this 2 production during 1993? 3 A. Di(2-ethylhexyl)phthalate was not being 4 produced by us during that time period. 5 Q. Was it being used by you during the relevant time 6 period -- during that time period? 7 A. Not in Unit 1. 8 Q. Was it being used in Unit 2? 9 A. There is no -- I don't know what your 10 definition of "Unit 2" is. 11 Q. Was it being used elsewhere at the Attleboro 12 facility during 1993? 13 A. Yes. 14 Q. Where? 15 A. In the color concentrate production. 16 Q. Are there any other materials that are listed on 17 here that are not accurate as being used in 18 Production Unit Number 1 in 1993 at the Attleboro 19 facility? 20 A. When you say "used," adipic acid was being 21 used. Di(2-ethylhexyl)phthalate, as it says 22 here, was being produced, was not being used. 23 Bis(2-ethylhexyl)adipate was being produced. 24 Again, it was not being used. I don't even see a 25 fourth one here. Now I see it. Phthalic	148 1 A. The color department. 2 Q. The color? 3 A. The color department. 4 Q. Okay. Do you see halfway down the paragraph 5 where it lists four compounds that were being 6 used in the color department in 1991? 7 A. Yes. 8 Q. Were these four compounds raw materials? 9 A. Yes. 10 Q. How did the Attleboro facility receive the barium 11 compounds in 1991? 12 A. In a bag. 13 Q. How did the Attleboro facility receive the 14 chromium compounds in 1991? 15 A. In a bag. 16 Q. How did the Attleboro facility receive the lead 17 compounds in 1991? 18 A. In a bag. 19 Q. Were all these bags similar? 20 A. I don't know. 21 Q. Can you give me a description of the bag 22 containing the barium compounds? 23 A. 50-pound bag, brown paper bag. 24 Q. Please give me a description of the bags 25 containing the chromium compounds.
147 1 anhydride was being used. 2 Q. Were any of these raw materials discarded into 3 the dumpster during this time period? 4 A. No. 5 Q. Were any of those raw materials discarded into 6 the dumpster during the relevant time period? 7 A. No. 8 Q. You stated earlier that adipic acid came in jumbo 9 bags to the Attleboro facility, correct? 10 A. Yes, sir. 11 Q. You also stated that there would be some residual 12 powder from the raw material that would be in the 13 bags when they were discarded into the dumpster, 14 correct? 15 A. That is correct. 16 Q. Can you turn to the next page, please. 17 A. Yes. 18 Q. Do you see the first paragraph that starts off 19 "Production Area Number 2" -- 20 A. Yes. 21 Q. -- "is known as the color area." So that's 22 called Production Area Number 2, correct? 23 A. No, that is not our terminology for it. 24 Q. What is Teknor Apex's terminology for the color 25 area?	149 1 A. Also be a 50-pound bag. 2 Q. Please give me a description of the bag 3 containing the lead compounds. 4 A. 50-pound bags. 5 Q. Were these types of bags received at the 6 Attleboro facility during the relevant period? 7 A. Yes. 8 Q. Were these bags disposed of at the Attleboro 9 facility during the relevant period in the 10 dumpster? 11 A. After they were emptied, yes. 12 Q. Was there any residual powder in these bags once 13 they were discarded into the dumpster during the 14 relevant period? 15 A. Yes. 16 Q. Can you turn to Exhibit 3 and its Appendix C, 17 which is its own stapled version. We might have 18 been looking at that earlier, it starts out with 19 TA112. Can you turn to TA124, please. 20 A. Okay. 21 Q. Can you look at this waste survey from TA124 22 through TA129 to see if bags containing residual 23 powder of barium, chromium or lead should have 24 been disclosed on one of these rows or columns? 25 (Witness complied.)

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150 1 A. I would say no. 2 Q. Why would you say that? 3 A. Because I don't -- the items that you 4 mentioned are either pigments or stabilizers and 5 I do not see either of those categories mentioned 6 in here. 7 Q. Can you turn to Page TA127. 8 A. Sure. 9 Q. Would the pigments in the one, two, three, fourth 10 row down qualify under your definition? 11 A. No, it's under painting and coating waste. 12 And then I read those other things under there to 13 be a subset of that and, therefore, I would not 14 have included it. 15 Q. Can you go to TA126. 16 A. Certainly. 17 Q. Fourth row up from the bottom, there's a term 18 called "Powders Listed Under the Top Category of 19 Metals." Would that have been an appropriate 20 place to list those powders? 21 A. I wouldn't. I wouldn't. I mean, that's not 22 how I took that looking at metals. And I'm 23 thinking of metals that we would typically think 24 of, so I wouldn't have put it there. 25 Q. Could reasonable minds disagree and would it be	152 1 I don't know who, but we had people come to the 2 plant, again, to suck them up into a vacuum truck 3 and remove them. 4 Q. Can you take a look back at the waste survey we 5 were just looking at from 124 to 129 and see if 6 there's an appropriate place where sludges should 7 go. 8 A. Yes. 9 Q. Can you show me where sludges should have been 10 listed on this waste survey. 11 A. Should have been under "Pretreatment Sludges, 12 Solutions" on Page TA00128. 13 Q. Can you tell me, besides the pit, how this sludge 14 was disposed of at the Attleboro facility? 15 A. Yes. For most of my knowledge, it went into 16 the pit and then it then was -- in other cases, 17 it was put in -- not in other cases, but 18 afterwards, it was put into drums. And like I 19 said, someone would come and dispose of that and 20 I -- I don't know who the disposal company was. 21 (Plaintiff's Exhibit Number 9 was so 22 marked.) 23 Q. Do you ever recall Teknor Apex being cited by any 24 state regulatory authority for not emptying its 25 bags sufficiently?
151 1 proper in that category to list those powders? 2 MR. BENIK: Objection. You can answer. 3 A. Reasonable minds can come up with any kind of 4 conclusion they would like. I mean, you asked me 5 if I could -- if I would put it in there. I 6 wouldn't have put it in there. Could someone 7 else have put that in there? Yes, they could 8 have. 9 Q. Was there any sludge produced at the Attleboro 10 facility in the relevant period? 11 A. Yes. 12 Q. Can you tell me how that sludge was produced? 13 A. In our wastewater treatment plant. 14 Q. Can you tell me what that sludge consisted of? 15 A. Consisted of water, diatomaceous earth. Those 16 would probably be the two major components of it. 17 Q. Can you tell me how that sludge was disposed of? 18 A. During a good period of that time it was 19 disposed of, it was put into a pit which has 20 since been remediated. A "pit" just meaning an 21 earth and bermed area, and then that area has 22 since been remediated. 23 Q. Were sludges disposed of in any other way besides 24 going to the pit? 25 A. Yeah. I can recall us having -- having -- and	153 1 A. No. 2 Q. Would it surprise you if such a notice of that 3 practice occurred at Teknor Apex? 4 A. Would it surprise me? No. 5 Q. Why wouldn't it surprise you? 6 A. You run an operation of that scale, I've 7 learned that all sorts of things happen. 8 Q. And when you say "all sorts of things happen," 9 isn't it conceivable that, in some instances, 10 powder and dust -- let me withdraw that question. 11 Isn't it conceivable at the Teknor Apex 12 Pawtucket facility that -- during the relevant 13 period, that there was more than residual dust in 14 the bags in the dumpsters? 15 MR. BENIK: Objection. 16 A. That is not -- wasn't our practice to put 17 anything but empty bags into the dumpster. That 18 was our practice. 19 Q. Isn't it also the case, during the relevant 20 period, that not all of the bags lived up to that 21 practice? 22 THE WITNESS: Say that again, please. 23 Q. Isn't it the case, during the relevant period, at 24 the Teknor Apex Pawtucket facility that not all 25 of the bags were clean according to that

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1 practice?

2 A. I do not know that.

3 Q. Isn't it correct that the bags of powder at the

4 Attleboro facility, during the relevant time

5 period, were not clean according to that

6 practice?

7 A. I do not know that that is not correct.

8 Q. Can you take a look at the document I just handed

9 to you -- or the court reporter just handed to

10 you that's Exhibit Number 9.

11 A. Yeah.

12 Q. Can you take a second to look through that and

13 once you've done that let me know if you've ever

14 seen this document before, please.

15 (Witness complied.)

16 A. I don't believe I've ever seen this before.

17 Q. Can you take a look at Page 2, please.

18 A. Certainly.

19 (Witness complied.)

20 Q. Please go down to the paragraph towards the end

21 that has a star and a check mark by it.

22 A. Yes.

23 Q. Do you have any reason to disagree with the

24 statement in that paragraph that up until that

25 time sludge had been dumped with the rest of the

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1 trash in the city landfill?

2 A. I was not aware of that. I can read this, but

3 I was not aware.

4 Q. Do you have any reason to dispute that statement

5 in that letter?

6 A. He was there, I wasn't, so, no, I do not know.

7 Q. Do you know the content of that sludge or sludge

8 that was being generated at the Attleboro

9 facility?

10 A. I mean, as it says here, bentonite clay,

11 ferric chloride and polyelectrolyte.

12 Q. And you're getting that from the paragraph above

13 the --

14 A. I'm just reading it, yeah.

15 Q. Would it surprise you that heavy metals were

16 present in the sludge?

17 A. There could be some heavy metals.

18 Q. What types of heavy metals?

19 A. I would think that you might find some trace

20 amounts of chrome, of possibly cadmium and lead.

21 Q. Do you know what the element SE stands for?

22 THE WITNESS: SE?

23 MR. DANLEY: Yes.

24 A. No, not off the top of my head.

25 Q. Would the sludge possibly have contained barium?

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1 MR. BENIK: Objection.

2 A. There is a possibility.

3 MR. DANLEY: I'll mark this in evidence.

4 Number 10.

5 (Plaintiff's Exhibit Number 10 was so

6 marked.)

7 Q. Can you take a look at that document, please.

8 A. Yes.

9 Q. Can you flip to the last page, please.

10 A. Uh-huh.

11 Q. Do you see the listing of elements, the second

12 one from the bottom, SE?

13 A. Yes.

14 Q. What does that stand for?

15 A. I don't know.

16 Q. BA, is that barium?

17 A. BA is barium. Yes, sir.

18 Q. Do you know the volume of sludge that was being

19 generated, during the relevant period, at the

20 Attleboro facility?

21 A. No, I do not.

22 Q. Would the amount of sludge be consistent with

23 the -- generated, during the relevant period, be

24 consistent with the amount of sludge generated as

25 of the date of these documents I've given you?

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1 A. These documents are during the relevant

2 period.

3 Q. Would the amount of sludge that was generated

4 during the date of these documents be consistent

5 with the amount of sludge that was generated in

6 the 1970's?

7 A. No.

8 Q. Why not?

9 A. Because the rate of production in the 1970's

10 was lower than this period of time.

11 Q. Was it consistent with Teknor Apex's practices,

12 during the relevant period, to send material

13 containing heavy metals to city landfills?

14 MR. BENIK: I'll object to the form.

15 You can answer.

16 A. The only way heavy metals would have gotten to

17 the landfill was a result of a residual powder in

18 an empty bag.

19 Q. And sludge, correct?

20 A. According to what I'm reading here, yes.

21 According to my knowledge, I'm not aware, as I

22 said earlier, that that's where that was going.

23 Q. And spills that were cleaned up using Speedy Dry

24 or other absorbants containing oil, correct?

25 A. I have not testified to the fact that we were

158 1 picking up spills with Speedy Dry. 2 Q. What were oil spills cleaned up with at the 3 Pawtucket facility? 4 THE WITNESS: At the Pawtucket facility? 5 MR. DANLEY: Yes. 6 A. As I testified earlier today, they were being 7 picked up by spreading resin on them, soaking the 8 resin up in the oil, then we would take this 9 remaining material and putting it into our garden 10 hose operation. 11 Q. Same document, Exhibit 3, Page TA22, and that's 12 Appendix B but that's not stapled together. 13 THE WITNESS: What's the number again, 14 please? 15 MR. DANLEY: TA19, it's the first page 16 of Appendix B. 17 Q. Do you see the first page of Appendix B? 18 A. Yes, I do. 19 Q. Please turn to Page TA22. 20 A. Okay. 21 Q. Please look at Subparagraph H. 22 A. Yes. 23 Q. Please look at the last line of this paragraph. 24 A. Uh-huh. 25 Q. Do you see where it's stated that Speedy Dry was	160 1 Q. Would Jonathan Fain know? 2 MR. BENIK: Objection. 3 A. I don't know what Jonathan Fain does or does 4 not know. 5 Q. Would he declare something under the penalty of 6 perjury that's untrue? 7 A. I doubt it. 8 MR. DANLEY: Take a break. I need five 9 minutes. 10 (A recess was taken.) 11 (Plaintiff's Exhibit Number 11 was so 12 marked.) 13 Q. Mr. Murray, in preparing for this deposition 14 today, you had the pleasure of reading the driver 15 deposition transcripts from -- taken in this 16 case, correct? 17 A. I didn't read every single word of every 18 single one, but, yes, I generally got the idea of 19 it. 20 Q. Do you generally remember seeing statements by 21 the drivers as to the content of the waste they 22 saw in Teknor Apex's dumpsters? 23 A. Yes, I do. 24 Q. Do you have any reason to dispute what they saw? 25 MR. BENIK: Objection. Don't answer
159 1 used to clean up oil at the Pawtucket facility 2 and the cleanup was placed in the dumpster? 3 A. Yes, I do. 4 Q. Do you have any reason to dispute that? 5 A. Yes, I do. 6 Q. What's your reason? 7 A. That it was not our normal practice. As you 8 asked earlier, was that normal practice. Our 9 normal practice was to spread resin on it and 10 then pick it up and put it into a garden hose. 11 Q. Did Teknor Apex employees always follow Teknor 12 Apex practices? 13 A. No. 14 Q. So you have no reason to dispute this statement 15 right here? 16 A. I -- I don't. 17 Q. Other than that wasn't your general practice? 18 A. That was not our general practice. 19 Q. But it happened, correct? 20 A. I do not know that -- if it happened. 21 Q. Would the person filling out this 104(e) response 22 know? 23 MR. BENIK: Objection. 24 A. I can't speak for the person who filled out 25 the 104(e).	161 1 that. He's not going to give -- 2 A. I can't answer that. 3 MR. BENIK: He's not answering regarding 4 every deposition without pointing to the specific 5 reference, Chris. 6 Q. Do you have any reason -- 7 MR. DANLEY: And I'm not saying that was 8 a proper objection, but we'll work around it. 9 Q. Do you have any reason to dispute that the waste 10 in the Teknor Apex dumpsters contained oil? 11 A. Yes. 12 Q. And what's the basis of your reasons for 13 disputing that? 14 A. Because we did not put oil in the dumps. It 15 certainly was not our practice. I have 16 personally not seen that being done and it is 17 somewhat impractical to pour a liquid into a 18 dumpster only to have it leak back out again. 19 Q. Is it impractical to clean up an oil spill with 20 absorbant and throw it in the dumpster? 21 A. As I said earlier, we cleaned up our oil 22 spills, typically, with resin and put it back 23 into our garden hose. We're in the business of 24 saving material. We're not in the business of 25 throwing material out because then we'd be in the

162 1 out-of-business. 2 Q. Is it impractical to clean out -- up spills with 3 absorbants and throw them in a dumpster? 4 MR. BENIK: Objection. You can answer. 5 A. Certainly some people do that. 6 Q. Does one need any sort of expertise to identify 7 oil? 8 A. No. 9 Q. Doesn't oil have a distinctive smell? 10 A. Not necessarily. 11 Q. Why not? 12 A. There are many different kinds of oils. Some 13 have smells, some do not. 14 Q. Do you have any reason to dispute that waste from 15 the Teknor Apex facilities in Pawtucket and 16 Attleboro were hauled to the J.M. Mills landfill, 17 during the relevant period? 18 A. I don't have any reason to dispute that, no. 19 Q. Do you have any reason to dispute that waste from 20 the Cumberland facility was hauled to the J.M. 21 Mills landfill, during the relevant period? 22 A. I have no reason to dispute that. 23 Q. Can you take a look at the exhibit that the court 24 reporter put before you that's Exhibit Number 11. 25 Just take a minute to look through that, please,	164 1 correct? 2 A. It appears to be. 3 Q. Do you know what "RQ" stands for? 4 A. Be guessing. Reportable quantity. 5 Q. And then there's a listing of "flammable liquid" 6 under RQ waste, correct? 7 A. Say that again, please. 8 Q. There's a listing of "flammable liquid" under RQ 9 waste on that page, correct? 10 A. Yeah. I don't know if that's a subset or a 11 different item. I don't know. I'm guessing a 12 different item by the way it's got a different 13 number. 14 Q. Yeah, it's got a different number. What types of 15 flammable liquids would be generated at the 16 Pawtucket facility during this time frame? 17 A. Oh, this is -- 18 Q. If we look down at the bottom, Ron Sito signed it 19 and dated it. 20 A. Yeah, 1990. I see. Okay. Flammable liquid, 21 1990. I'm sure that there was some -- maybe some 22 oils left from -- after being taken out of a 23 gearbox, might be one type of flammable liquid. 24 It might -- not knowing what an F005 is, he 25 might have been also disposing of something from
163 1 and let me know when you're ready. 2 A. Okay. 3 Q. On the first page of Exhibit Number 11, Paragraph 4 8A -- do you see that? 5 A. 8A, yes. 6 Q. There is a check by "large generator," correct? 7 A. Yes. Yes. 8 Q. What material or substance is being referenced in 9 terms of this facility being a large generator? 10 A. I don't know in the context of this. I don't 11 know what the question was, the question that 12 they were answering. 13 Q. Let's see. If you flip through the documents, 14 let's go to the second page, it's TA706. 15 A. Yeah. 16 Q. Do you see Paragraph 12A where it says, 17 "distillate"? 18 A. Yes. 19 Q. Okay. Let's go to the next page, please, 707. 20 Do you see Paragraph 12A where it says, "waste 21 petroleum"? 22 A. Yes, I do. 23 Q. All right. Let's flip to the next page, please. 24 Do you see Paragraph 12A where it says, "RQ waste 25 flammable." Well, "RQ waste" is one listing,	165 1 our laboratory in Pawtucket. I'm sure some of 2 those are considered flammable. 3 Q. Can you flip to the next page, TA709, please. 4 A. Yes. 5 Q. Paragraph 12A -- 6 A. Yeah. 7 Q. -- do you see that? 8 A. Yeah. 9 Q. "Waste Oil Combustible Liquid"? 10 A. That's probably the gearbox stuff, yeah. 11 Q. Can we flip to the next page, please. 12 A. Yeah. 13 Q. Page 7, TA710, Paragraph 12A, "waste oil" and 14 then under that "more combustible liquid" for 15 another listing, correct? 16 A. Yeah. 17 Q. Let's flip to the next page, please. 18 A. Yeah. 19 Q. Paragraph 12A on Page TA711, do you see where it 20 says, "Waste Oil Combustible Liquid"? 21 A. Yes. 22 Q. Can we go back to the front page, please. 23 A. Back to the front page. Yeah. 24 Q. Isn't it reasonable to assume that whenever 25 Teknor Apex checked the box by large generator,

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166 1 it was referring to waste oil or some other type 2 of liquid? 3 A. That's reasonable to assume, but I don't know 4 that. 5 Q. Did the Teknor Apex Pawtucket facility generate 6 these amounts of waste oil or liquid products, 7 during the relevant period? 8 A. I would think so, yes. 9 Q. Do you know how the waste oil was disposed of, 10 during the relevant period? 11 A. As I said earlier, I believe it was sent to 12 places like Narragansett Improvement, McDonald 13 Watson, this greenhouse. I think those were the 14 ways that it was dealt with during that period of 15 time. 16 Q. Were those the ways in which waste oil was 17 disposed of in the 1970's? 18 A. I believe so. 19 Q. Were there any records of that? 20 A. I do not think -- I do not believe there are 21 records of that. I was not able to find any 22 records of that in my investigation. 23 Q. Did someone that you conferred with tell you that 24 waste oil was disposed of in such a manner in the 25 1970's?	168 1 A. That appears to be correct, yes. 2 Q. Let's go through each one of these locations. I 3 just want to know where they're located at. 4 A. Okay. 5 Q. For the first sample, it says "01 Central Avenue, 6 'A' farm dust collector." Where is that at? 7 A. That is located at 505 Central Avenue and it's 8 in our tank farm. 9 Q. What about the second listing, "03 Central 10 Avenue"? 11 A. That would also be located at 505 Central 12 Avenue in our vinyl department. 13 Q. What about the third listing, "349 Central 14 Avenue"? 15 A. That would also -- that would also be the 16 street address, 505 Central Avenue -- I have no 17 idea why it says 349 there -- but also in our 18 vinyl department. 19 Q. For the fourth listing, "350 Central Avenue," 20 where is that located? 21 A. 505 Central Avenue also in our vinyl 22 department. 23 Q. What about the fifth listing, "351 Central 24 Avenue," where is that located? 25 A. 505 Central Avenue in our vinyl department.
167 1 A. Yes. 2 Q. Who? 3 A. Ron Sito was one of the people that I spoke 4 with about that subject. 5 MR. DANLEY: I'll tell you what, can we 6 go off the record for five minutes and I'll sort 7 all of my exhibits so I don't have to sort them 8 again, and that will go a lot quicker and it will 9 give people a chance to grab a drink or 10 something. So off the record. 11 (A recess was taken.) 12 (Plaintiff's Exhibit Number 12 was so 13 marked.) 14 Q. Mr. Murray, can you look at Exhibit Number 12, 15 please. 16 A. Number 12. 17 Q. Let me know when you've had a chance to look 18 through it. 19 A. Okay. 20 Q. Can you go to the second page, please. It's 21 marked TA683. 22 A. Yes. 23 Q. And on this page and the next page, aren't there 24 12 samples from the various dust collector units 25 from the Teknor Apex Pawtucket facility?	169 1 Q. What about the sixth listing, "455 Central 2 Avenue"? 3 A. 505 Central Avenue in what I referred to 4 earlier would have been the fourth structure in 5 Building 1 where I said we made soling and now we 6 make TPE. 7 Q. It contained the rubber in the first building, 8 the fourth facility -- 9 A. Correct. 10 Q. -- that did rubber compounding, things like that? 11 A. Yeah. Yeah. Correct. 12 Q. And that's the sixth line, is that -- 13 A. That is correct. 14 Q. What about the seventh line, where is that 15 located? 16 A. That would have been the last structure in 17 what I referred to earlier as Building 1 at 505 18 Central Avenue in the garden hose department. 19 Q. I think we called that Building 5 or Structure 5? 20 A. I think we did, yeah. 21 Q. There is a listing on here right after seven, it 22 looks like it should be eight where it says "786 23 Central Avenue, Number 1 Banbury"? 24 A. Yes. 25 Q. Where is that located at?

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170 1 A. That is also 505 Central Avenue in Structure 2 5, Building 1, in what was the tread rubber area. 3 Q. Let's go to the next page, please. 4 (Witness complied.) 5 Q. "Number 9665, Central Avenue," can you tell me 6 where that's at? 7 A. That would be in what I referred to earlier as 8 Building 2 bounded by Oakland on the north and 9 Hughes to the south, and that dust collector is 10 located in the second structure that I referred 11 to. 12 Q. The one that did the soling and buffing? 13 A. Yes, but this particular thing has nothing to 14 do with soling and buffing. 15 Q. The tenth line, "835 Central Avenue," can you 16 tell me where that's located at? 17 A. That would be at 505 Central Avenue, what I 18 referred to as Building Number 1, Structure 19 Number 5, in the tread rubber area. 20 Q. The 11th listing, "1029 Central Avenue," can you 21 tell me where that's located at? 22 A. That would have been also 505 Central Avenue 23 street address, what I referred to as Building 24 Number 1, Structure Number 5, in the garden hose 25 area.	172 1 A. Yes. 2 Q. Would cadmium be found in the dust and rated at 3 the Pawtucket facility, during the relevant 4 period? 5 A. Yes. 6 Q. Would chromium be found in the dust generated at 7 the Pawtucket facility, during the relevant 8 period? 9 A. Yes. 10 Q. During the relevant period, how was the dust 11 generated at the Pawtucket facility disposed of? 12 A. In a variety of manners. In the vinyl 13 compounding facility, the dust generated into the 14 dust collectors, again, would be collected and 15 put into the garden hose operation. Dust that 16 was swept up off the floor, as I testified 17 earlier, would be put into the dumpster. And 18 dust generated from the buffing operations would 19 be put into boxes and then sent, you know, to the 20 landfill. Dust from the rubber operation would 21 be handled in a similar manner to the soling 22 operation. Some portion of both soling and 23 rubber dust was recycled, but not all of it. 24 Q. So is it fair to say that dust generated at the 25 Pawtucket facility containing barium was placed
171 1 Q. And the last listing, "Number 12, 4-1 and 4-2 2 Banbury," can you tell me where that's at? 3 A. Yes, that's at 505 Central Avenue, what I 4 referred to as Building Number 1, Structure 5 Number 4. 6 Q. The concentrations of dust that were sampled from 7 these 12 sites are from 1991, correct? 8 A. Yeah. They're actually concentrations of a 9 variety of metals within the dust. 10 Q. Would these concentrations be similar to the 11 concentrations of dust that were found at the 12 Pawtucket facility during the relevant period? 13 MR. BENIK: Objection. 14 A. I think they would probably be similar, but 15 when you take these kinds of tests you can take 16 two tests two days in a row and get 17 dramatically -- orders sometimes amounted to 18 different numbers. So when you say "typical," 19 I'm not sure what "typical" means. 20 Q. Would barium be found in the dust generated at 21 the Pawtucket facility, during the relevant 22 period? 23 A. Yes. 24 Q. Would lead be found in the dust generated at the 25 Pawtucket facility, during the relevant period?	173 1 into the dumpster during the relevant period? 2 A. No, that would not be correct. 3 Q. Why not? 4 A. Because barium would be found in the vinyl 5 dust collectors and that would go into the garden 6 hose. I guess to the extent that any of it was 7 on the -- fell onto the floor and was swept up, 8 you could say that. But that wouldn't -- that's 9 not the predominant amount. 10 Q. Would it be fair to say that dust generated by 11 the Pawtucket facility, during the relevant 12 period, contained cadmium and was placed into the 13 dumpster? 14 MR. BENIK: Objection. You can answer. 15 MR. DANLEY: Let me withdraw that. 16 Q. Would it be fair to say that dust generated at 17 the Pawtucket facility containing cadmium was 18 placed into the dumpster? 19 A. To the extent that it was in floor sweepings, 20 yes. To the extent that it was dust collector 21 dust, no. 22 Q. Would it be fair to say that dust generated at 23 the Pawtucket facility containing lead, during 24 the relevant time period, was put into the 25 dumpster?

174 1 A. To the extent that it was floor sweepings 2 and/or residual in bags, yes. To the extent that 3 it was in the dust collector, no. 4 Q. Would dust generated at the Pawtucket facility 5 containing chromium be placed into the dumpster, 6 during the relevant period? 7 A. To the extent that that was in the dust swept 8 up off the floor, yes. To the extent that that 9 was in the dust collectors, no. 10 Q. Was barium sent to the Pawtucket facility, during 11 the relevant period, in bags? 12 A. Yes. 13 Q. During the relevant period at the Pawtucket 14 facility, were bags containing residual barium 15 disposed of in the dumpster? 16 A. Yes. 17 Q. Were bags containing cadmium sent to the 18 Pawtucket facility, during the relevant period? 19 A. Yes. 20 Q. Were bags containing residual amounts of cadmium 21 disposed of in the dumpster at the Pawtucket 22 facility, during the relevant period? 23 A. Yes. 24 Q. Were bags containing lead sent to the Pawtucket 25 facility, during the relevant period?	176 1 Q. Let's assume something for a minute. Assume that 2 a whole 50-pound bag of barium dust -- and I know 3 that you necessarily wouldn't put waste in a bag, 4 but let's assume that that 50-pound bag of barium 5 dust is put into the dumpster. Do you know what 6 types of level, if you added the barium dust 7 together and the aggregate, you would get for 8 barium? 9 A. Not -- not in -- no, I wouldn't. I mean, 10 these -- in this case, barium is part of a 11 stabilizer. It's kind of an organometallic 12 compound. And the percentage barium depending on 13 the stabilizer does vary. I can't even tell you 14 exactly what the percentage of barium happens to 15 be, but it's nowhere near 100 percent barium. 16 And in some cases, there's even a carrier that is 17 with it that simply acts as just like that, as a 18 carrier. 19 Q. Was the chromium that we were discussing 20 trivalent? 21 A. I don't know, to be honest with you. 22 Q. Was the chromium that we were discussing 23 hexavalent? 24 A. I -- I do not believe so. 25 Q. And why don't you believe so?
175 1 A. Yes. 2 Q. Were bags containing residual amounts of lead 3 disposed of at the dumpster, in the relevant time 4 period, at the Pawtucket facility? 5 A. Yes. 6 THE WITNESS: Could I clarify one thing? 7 MR. DANLEY: Yes. 8 A. You're speaking about lead, barium and 9 chromium as if they are pure substances and, in 10 fact, that is not the case. They are pure 11 substances, I know that chemically, but in the 12 manner that we use them they are not pure lead. 13 You do not get a bag of lead. You do not get a 14 bag of chrome. You do not get a bag of cadmium. 15 Q. Can you take a look at Line Number 3, please, the 16 349 Central Avenue on TA683. 17 A. Line Number 3 of TA683, yes. 18 Q. It lists a concentration of barium at 240 PPM. 19 Do you see that? 20 A. Yes. Yes, I do. 21 Q. What does this listing reflect? How was this 22 sample collected? Do you know? 23 A. It looks like this sample was collected from 24 the dust collector and then they performed this 25 Method 1311 TCLP test on that dust.	177 1 A. Because the chromium that we're discussing 2 here was in the form of lead chromate, so it was 3 bound up. And when you start talking about 4 hexavalent chromium, you're talking about 5 chromium as a pure substance. 6 (Plaintiff's Exhibit Number 13 was so 7 marked.) 8 Q. Can you take a look at Exhibit Number 13 and let 9 me know when you've read it, please. 10 A. Okay. 11 Q. Please go to the second paragraph on the page 12 labeled TA701. 13 A. Yeah. 14 Q. The paragraph in this letter refers to packaging 15 bags? 16 A. Uh-huh. 17 Q. And it lists three substances? 18 A. Uh-huh. 19 Q. Was the first substance -- well, can you 20 pronounce the first substance for me? 21 A. Ammonium OctaMolybdate. 22 Q. Was that substance a raw material used at the 23 Pawtucket facility? 24 A. Yes. 25 Q. What's the physical description of that material?

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178 1 A. You'd refer to it as a powder. 2 Q. Is it a particular color? 3 A. I believe it's white. 4 Q. Can you pronounce the name of the second 5 substance? 6 A. Antimony Trioxide. 7 Q. Was that a raw material used at the Pawtucket 8 facility? 9 A. Yes. 10 Q. Can you give me a physical description of this 11 substance. 12 A. Also it's a white powder. 13 Q. Can you pronounce the name of the last substance 14 in this instance. 15 A. N-cyclohexylthiophthalimide. 16 Q. Is this substance a raw material used at the 17 Pawtucket facility? 18 A. Yes. 19 Q. What was the physical description of this 20 substance? 21 A. This is also a powder or a granule. 22 Q. Were these substances used as raw materials at 23 the Pawtucket facility, during the relevant 24 period? 25 A. Certainly Antimony Trioxide and	180 1 know if they were hazardous substances according 2 to any regulation? 3 A. I don't believe any of those are hazardous 4 substances. 5 Q. Are these the types of substances that Teknor 6 Apex routinely disposes of in the dumpster? 7 THE WITNESS: In what time frame? 8 MR. DANLEY: In the relevant period. 9 A. As a residual in an empty bag or as a 10 component of floor sweeping, Antimony Trioxide 11 and N-cyclohexylthiophthalimide, yes. Ammonium 12 OctaMolybdate, I am not sure that we were using 13 during the relevant period. 14 Q. Can you turn to the last -- the second page of 15 this exhibit, please, listed as TA702. 16 A. Sure. 17 Q. Can you take a moment to just read that to 18 yourself and let me know after you've read this 19 page. 20 (Witness complied.) 21 A. Yes. 22 Q. Does it surprise you that the Rhode Island 23 Department of Environmental Management cited the 24 Pawtucket facility for possibly negligent waste 25 management?
179 1 N-cyclohexylthiophthalimide. I'm not -- I'm not 2 certain on Ammonium OctaMolybdate. I'm not sure 3 if that would have been used in that time frame. 4 Q. Do you know the approximate time frame in which 5 the Pawtucket facility started using Ammonium 6 OctaMolybdate? 7 A. Molybdate. 8 Q. Molybdate. Sorry. Trying to match you. 9 A. I couldn't give you an exact timing, but I 10 don't think we were using it back as early as 11 1985. 12 Q. Was Antimony Trioxide disposed of in the 13 dumpsters at the Pawtucket facility, during the 14 relevant period? 15 A. As a residual in an empty bag, yes. As a 16 component of floor sweepings, I'm sure some 17 amount was. 18 Q. Was N-cyclohexylthiophthalimide -- the last 19 substance in the sentence -- disposed of in the 20 dumpster at the Pawtucket facility, during the 21 relevant period? 22 A. As a residual in a paper bag and/or as a 23 component in the floor sweepings, yes. 24 Q. As of 1995, the three substances listed in the 25 second sentence of the second paragraph, do you	181 1 A. Yes, it does surprise me. 2 Q. Why is that? 3 A. Because the conclusions reached in this letter 4 are incorrect. 5 Q. And why do you say that? 6 A. They took a sample from the area adjacent -- 7 from what I can tell, adjacent to where the 8 dumpster is and they found high concentrations on 9 the ground adjacent to the dumpster. And from 10 that conclusion, they concluded that full bags 11 must have been going or partially full bags must 12 have been going into the dumpster to get to those 13 levels. That's just an incorrect conclusion. 14 One does not lead to the other. It's not even 15 logical. 16 Q. And why is that? 17 A. During the time period, I don't know how many 18 bags went into the dumpster -- and a lot of bags 19 went into the dumpster, and even if a small 20 amount was in each bag, to get 250 parts per 21 million of Molybdenum, which they are talking 22 about here -- that's the only number I see quoted 23 in here -- would not be surprising. You could 24 have all empty bags and still get to that. 25 That's an extremely low concentration.

182 1 Q. Does it surprise you that RIDEM concluded that at 2 the scene of the incident that they found not 3 every practical effort was made to empty the bags 4 being disposed of? 5 THE WITNESS: Where do they say that? 6 MR. DANLEY: First paragraph, second 7 page. 8 A. First paragraph. It says, "Based on evidence 9 found at the scene of the incident, we would 10 conclude that every practical" -- and I'm just 11 saying I disagree with their conclusion. 12 Q. Were you at the scene? 13 A. No, I was not. 14 Q. What is your basis for disagreeing with their 15 conclusion? 16 A. My basis of my disagreement is they took the 17 sample adjacent to where the dumpster was. The 18 dumpster had been there for, by that point in 19 time, probably decades. Countless number of 20 empty bags went into that container. Even with a 21 small amount of residual to get to the 22 concentration of 250 parts per million, you know, 23 I could see that happening. You do not -- to 24 make that conclusion that you must have put a 25 full bag in there or a partially full bag in	184 1 Q. So it's conceivable that, during the relevant 2 period, at the Pawtucket facility bags were 3 disposed of that contained more than residual 4 amounts of powder? 5 MR. BENIK: Objection. 6 A. No, that is not -- that is not conceivable. 7 Q. That is not conceivable -- 8 A. No, it is not. 9 Q. -- that it never happened? 10 A. I don't know that it never happened. You 11 asked me if it's conceivable. I'm trying to 12 answer your questions as you're asking them. 13 Q. Is it possible -- 14 MR. BENIK: Objection. 15 Q. -- that bags containing more than the residual 16 amount of powder was disposed of in the dumpster 17 at the Pawtucket facility, during the relevant 18 period? 19 MR. BENIK: Objection. 20 A. Anything is possible. 21 Q. Is it possible that -- well, withdrawn. 22 MR. DANLEY: Let's go off the record. 23 (A recess was taken.) 24 Q. Mr. Murray, can you turn to Exhibit 3, Appendix 25 D, located at TA146. It's stapled together, so
183 1 there, quite frankly, is a leap of faith. 2 Q. Were you saying that RIDEM was taking samples 3 from the location of the dumpster? 4 A. They say -- right at the very, very beginning 5 here, they said that it was determined that a 6 truck belonging to McCaughey Standard -- which is 7 a waste hauler -- carrying waste was in route to 8 its transfer station. So I'm assuming that 9 they -- you know, that they took it, I don't 10 know, on the street adjacent to it or something. 11 I don't know. Says, "released on the roadway." 12 I have no idea where the roadway was, but I'm 13 assuming it was right adjacent to it. 14 Q. Were you referring to samples being taken at the 15 place of the dumpster earlier with reference to 16 this letter? 17 A. That's right, because the roadway's adjacent 18 to the dumpster. In fact, the dumpster's almost 19 on the roadway. It's the only conclusion -- 20 Q. Where in the letter does it say where the samples 21 were taken? Where in the letter does it say 22 samples were taken at the dumpster? 23 A. It doesn't. It just says -- 24 Q. So that an assumption on your part, right? 25 A. That's right.	185 1 that might be an easy way to find it. 2 A. I have it. 3 Q. And doesn't this refer to the Teknor Apex 4 Cumberland facility? 5 A. Yes, it does. 6 Q. Do you know the types of processes that were 7 performed at the Cumberland facility prior to 8 1985? 9 A. No. 10 Q. Can you turn to page TA148, please. 11 THE WITNESS: TA what? 12 MR. DANLEY: 148. 13 A. Okay. 14 Q. Do you see Subparagraph B? 15 A. Yes. 16 Q. Do you have any reason to disagree with the 17 statements made in Subparagraph B as to the 18 process at the Cumberland facility prior to 1985? 19 A. No, I do not. 20 Q. Please look at Subparagraph E. 21 A. Yes. 22 Q. Do you have any reason to dispute that these raw 23 materials were used at the Cumberland facility 24 prior to 1985? 25 A. No, I do not.

186 1 Q. Please look at Subparagraph G, second to the last 2 sentence. It states, "Purging of the equipment, 3 floor sweepings and rags were all disposed of in 4 the dumpster." Do you have any reason to dispute 5 that statement at the Cumberland facility prior 6 to 1985? 7 A. I'm looking for that spot. I'm trying to 8 catch up with you here. I don't have any reason 9 to disagree with that. 10 Q. Excuse me? 11 A. I have no reason to disagree with that. 12 Q. Please look at the next paragraph in Subparagraph 13 G. Do you have any reason to dispute that rags 14 containing solvent were disposed of in the 15 dumpster at the Cumberland facility prior to 16 1985? 17 A. I have no reason to believe that. I don't 18 dispute it. 19 Q. Please look at the paragraph at the bottom of the 20 page where the head of the paragraph is entitled 21 "Specific Equipment." Do you see that? 22 A. Yes. 23 Q. The next sentence, it says, "Extruders were 24 typically purged with polyethylene"? 25 A. Yes, sir.	188 1 A. Okay. All right. I'm with you now. Thank 2 you. 3 Q. Do you know how this dust collector dust was 4 disposed of from 1966 to 1985 at the Cumberland 5 facility? 6 A. I do not. 7 Q. How was this type of dust disposed of after 1985? 8 A. I also do not know. 9 Q. Why don't you know? 10 A. I don't know. I don't know why I don't know, 11 but I don't. 12 Q. Is it possible that this dust is disposed of in 13 the dumpster? 14 MR. BENIK: Objection. 15 A. It is possible. 16 Q. Please turn to Page TA153. 17 A. Okay. 18 Q. Please look at Subparagraph E. 19 A. Yes. 20 Q. Last row on that table, "Solid Waste." Do you 21 see that? 22 A. Yes. 23 Q. The next column over, it references a fibrous 24 drum. Do you see that? 25 A. Yes.
187 1 Q. What is that substance? 2 A. It's a plastic. 3 Q. What types of chemicals comprise that substance? 4 A. Carbon and hydrogen. 5 Q. Please turn to the next page, Page TA149. 6 A. Uh-huh. 7 Q. In Subparagraph H, it states that spilled 8 materials were discarded into the dumpster; is 9 that correct? 10 A. I assume so. I don't know. We didn't own it 11 before 1985, so I don't know. 12 Q. Please turn to Page TA150. Do you see 13 Subparagraph A? 14 A. Yes. 15 Q. Please look at the last row of Subparagraph A 16 where it says, "dust collector dust." Do you see 17 that? 18 A. No, I don't. 19 Q. Look at the first -- 20 A. Page 150. 21 Q. 150, Subparagraph A. 22 A. Subparagraph A, waste survey. 23 Q. There's a table. 24 A. Yeah. 25 Q. The last row of the table.	189 1 Q. Do you know what was in these fibrous drums that 2 were disposed of in the dumpster? 3 A. No. 4 Q. Were such fibrous drums disposed of in the 5 dumpster when Teknor Apex owned and operated the 6 facility? 7 A. Yes. 8 Q. What are in those fibrous drums? 9 A. I don't know. 10 Q. Why not? 11 A. In this case, I don't know because it could be 12 a variety of things. I mean, usually fibrous 13 drums were used as -- to put our finished product 14 in. So maybe a drum got damaged and we emptied 15 it and put it in a different drum and threw the 16 drum away. We typically did not get raw 17 materials in drums, so I would suspect that it 18 would have come from a finished good. 19 Q. Can you turn to Page TA161. 20 A. Okay. 21 Q. Do you see the second to the last row says 22 "other"? 23 A. Second to the last, yes. 24 Q. And the row under "other" says, "Solids from 25 recirculated cooling water system cleanout." Do

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190 1 you see that? 2 A. Yes, I do. 3 Q. Do you have any knowledge about this waste at 4 all? 5 A. Vague. 6 Q. Tell me. 7 A. It would be material that might have -- that 8 had collected in the bottom of a sump. 9 Q. What types of material would that be comprised 10 of? 11 A. It could be all sorts of things, anything that 12 could have possibly gotten on the floor and then 13 went down the drain and then went into the sump 14 and then, you know, separated from the water. 15 Q. Do you know why this substance was listed under 16 "other"? 17 A. Just probably didn't fit the other categories 18 would be my guess, but I am -- that is a guess as 19 I did not fill out this form. 20 Q. Do you know who filled the form out? 21 A. If I look at it. Well, this was part of 22 Exhibit 3, so it says right at the very beginning 23 "David Yopak," so I would assume that he was part 24 of filling it out. 25 Q. Do you know if there was any waste generated at	192 1 EXAMINATION BY MR. MURPHY 2 Q. My name is Jonathan Murphy. I represent KIK 3 Custom Products the other plaintiff entity in 4 this case. 5 And first just a few kind of background 6 questions so I get a sense. You indicated this 7 morning that you'd been at Teknor for 31 years. 8 So you started in 1978, correct? 9 A. That's right. 10 Q. Can you give me just a little bit of background 11 on what your educational background is. 12 A. I have a degree in mechanical engineering from 13 the University of Rhode Island and I have an MBA 14 from Bryant University. 15 Q. And when did you get those degrees? 16 A. I got my degree in engineering in 1978 and I 17 got my degree -- my MBA '91 or '92. I honestly 18 don't remember. 19 Q. So it appears to me that you got your mechanical 20 engineering degree in 1978 and then went right to 21 work for Teknor; is that correct? 22 A. That is correct. 23 Q. Did you, prior to working for Teknor Apex, work 24 as an engineer at any other manufacturing 25 company?
191 1 the Cumberland facility when Teknor Apex owned 2 and operated the facility that was not disposed 3 of using a dumpster? 4 A. That was not? Hold on. Can you say that one 5 more time. 6 MR. DANLEY: Can you repeat that, 7 please. 8 (The question was read.) 9 A. I don't absolutely know, but I would suspect 10 there were things that we got rid of in other 11 fashions other than in the dumpster. 12 Q. How so? 13 A. How so? I don't know. Maybe we had broken 14 skids that we sold to somebody and, you know, we 15 probably recycled some cardboard. I'm certain 16 that we probably recycled some paper during that 17 period of time, you know, things of that nature. 18 Q. Is that just speculation on your part? 19 A. That's speculation. 20 MR. DANLEY: Well, I have no further 21 questions. 22 MR. MURPHY: I've got some questions. 23 Do you want to take a break? Keep going? 24 THE WITNESS: Keep going. 25	193 1 A. No. 2 Q. Did you have any professional experience as an 3 employee working as an engineer anywhere prior to 4 working for Teknor? 5 A. No. 6 Q. So fair to state that your entire, kind of, 7 engineering career has been spent as an employee 8 of Teknor Apex? 9 A. Yes. 10 Q. You mentioned garden hose or vinyl hose a number 11 of times. 12 A. Yes, sir. 13 Q. Which facilities? We've talked about three 14 different facilities, correct? 15 A. Yes. 16 Q. The Pawtucket facility, the Attleboro facility 17 and the Cumberland facility? 18 A. Yes. 19 Q. Did the Cumberland facility ever manufacture any 20 sort of hose, garden hose? 21 A. No. 22 Q. So that was a Custom Color facility -- 23 A. Yes. 24 Q. -- only; is that right? 25 A. Yes.

194 1 Q. Now, the other two facilities -- let's start with 2 Pawtucket. Did Pawtucket ever manufacture what I 3 guess a layperson would call garden hose? 4 A. Yes. 5 Q. And what about the Attleboro facility? 6 A. No. 7 Q. So only Pawtucket? 8 A. Yes. 9 Q. Typically, when I go into a store, most garden 10 hoses are green, are greenish in color? 11 A. That's correct. 12 Q. Was that the typical color of the -- 13 A. That's the typical color. 14 Q. Can you explain briefly for me how is garden hose 15 made? How is it made at the Pawtucket facility? 16 Walk me through the process, generally. 17 A. Okay. Number one, it's not made at the 18 Pawtucket facility any longer. 19 Q. Okay. 20 A. Okay. 21 Q. Do you have a sense, by the way, of what years it 22 was made in Pawtucket? 23 A. I couldn't tell you exactly when it started. 24 It started sometime in the '50's and it ended, I 25 believe, in 1993.	196 1 I also described earlier. We would take that 2 scrap PVC, we would process and form it into a 3 somewhat uniform pellet. It would be then -- 4 that pellet would then be extruded into the 5 interior of the garden hose. 6 Q. And what was the extrusion process? Did the PVC 7 pellets need to be heated? How do you take the 8 pellets and turn them into long continuous kind 9 of waterproof sections of hose? 10 A. Okay. You take the pellets. You put them 11 into what is referred to as an extruder -- that's 12 a barrel that has a screw on the inside of it. 13 You heat the barrel. You put pressure against 14 the end of the barrel in the form of putting a 15 dye onto that extruder. And between the 16 mechanical energy put in by the screw and the 17 electrical energy put into the form of heat, you 18 melt the material. It comes out through the dye, 19 you put air in the middle of it to keep it hollow 20 on the inside and then you cool it, and when you 21 cool it, it retains its shape. 22 Q. And was this a production line? I mean, what -- 23 in 1978, you had occasion to be in the Pawtucket 24 facility, correct? 25 A. Yes.
195 1 Q. 1993? 2 A. Yes. 3 Q. Okay. So '50 -- 4 A. Sometime in the '50's, it started. I just 5 don't know the date. 6 Q. Okay. So you've talked before about how PVC 7 pellets were made at the facility. 8 A. Uh-huh. 9 Q. And that there was also dust collection in, I 10 guess, various components of PVC that would be 11 collected, and I think you said recycled into the 12 garden hose and stuff? 13 A. Uh-huh. 14 Q. I'm assuming that at a certain point there would 15 be PVC materials that had been created at 16 Pawtucket that then were used to make garden 17 hose? 18 A. That is correct. 19 Q. Okay. And then so was most of the PVC material 20 that was used to make garden hose in Pawtucket in 21 this pellet form or chunk form? 22 A. Yes and no. In making a garden hose, the 23 inside part of the garden hose was made from 24 scrap PVC, which as I said earlier, we would 25 purchase and/or, to some extent, we generated, as	197 1 Q. I can't remember the exact dates you gave, but 2 did you physically observe in 1978 the garden 3 hose manufacturing process? 4 A. Yes. 5 Q. Was it a production line as I would think of one 6 in a manufacturing facility where there were 7 various stages in a linear fashion where it 8 started with the pellets going into the extruder 9 and then at some point in the end there was kind 10 of finished garden hose product? 11 A. Actually, there are many production lines and 12 it's -- and it's not a continuous process. It 13 goes step-by-step-by-step. 14 Q. There's been a lot of testimony about 15 plasticizers? 16 A. Yes. 17 Q. And those were principally phthalates; is that 18 correct? 19 A. Principally phthalates, yes. 20 Q. Do phthalates act to kind of soften the PVC? 21 A. Yes. 22 Q. Make it more flexible? 23 A. Yes. 24 Q. As a layperson, when I think of PVC or PVC pipe, 25 I think of that hard white plastic pipe, PVC

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198 1 pipe, that's used in certain applications for 2 drain lines. Do you know what I'm talking about? 3 A. Yes, I do. 4 Q. Is that kind of the state that you can -- is that 5 one state that you can turn PVC into if you don't 6 put any plasticizers into it? Does it tend to 7 come out in that sort of a hardened state? 8 A. Yes. 9 Q. Is that the standard state that PVC comes out in 10 if you don't add plasticizers? Do you know? 11 A. I'm not sure it's the standard state, but it 12 is a state, yes. 13 Q. Okay. And was that sort of hard PVC pipe, the 14 white type of PVC pipe, that you think of as 15 being used for conduits or drain lines, that sort 16 of thing? Was that a product made by Teknor 17 Apex? 18 A. No. 19 Q. So did all of the PVC products or materials that 20 Teknor Apex made have plasticizers added to them 21 to make it a softer more malleable or flexible 22 type PVC? 23 A. Yes. 24 Q. The pellets themselves that we talked about that 25 would go into the extruder, did they already have	200 1 be was added during the course of making the 2 pellets? 3 A. Correct. 4 Q. Was there an infinite number of kind of shades of 5 colors that you could create -- 6 A. Yes. 7 Q. -- at the facility? 8 A. Yes. 9 Q. Was it just a matter of which kind of types of 10 coloration and pigmentation you added and certain 11 concentrations and ratios? 12 A. Yes. 13 Q. The garden hose -- would sections of the garden 14 hose that were nonconforming or off spec get 15 thrown into the dumpsters? 16 A. Not normally. That would not be the normal 17 practice. 18 Q. What happened with sections of garden hose that 19 for one reason or another were off spec? 20 A. One of two things, if we had not put 21 reinforcement onto the garden hose, we would 22 simply put it back into our -- as a scrap item 23 back into the front end of the operation, grind 24 it up and make it into a hose all over again. If 25 we had added reinforcement to it in the form of
199 1 the plasticizer in them at that point? 2 A. Yes. 3 Q. So you didn't have to add more plasticizer -- 4 when I say "you", Teknor, didn't have to add more 5 plasticizer into that extruder to get the 6 flexibility of the hose after it was heated up 7 and extruded? 8 A. No, we did not. 9 Q. The coloring -- if the garden hose came out in 10 that kind of bright green color you see when you 11 go to buy a house, how was the -- were the 12 pellets that color when they went into the 13 extruder or was there a coloring process during 14 the process of fabricating the garden hose? 15 A. The color was in it when we started. 16 Q. So what color were those pellets? 17 A. Whatever color we would like the garden hose 18 to be. 19 Q. Okay. And that coloring process occurred, then, 20 earlier in the production process to create the 21 PVC pellets? 22 A. Correct. 23 Q. And so when we've talked earlier and there was 24 testimony about pigments and color additives, 25 whatever color you wanted the ultimate product to	201 1 either nylon and/or polyester, we would then 2 gather it up. We would send it to an outside 3 entity where they would grind it up. And they 4 would separate the nylon and/or polyester from 5 the PVC and we would purchase back the PVC, 6 again, put it back in the front end of the 7 operation and then go through and make it into a 8 garden hose again. 9 Q. And this process of taking the reinforced hose 10 and sending it out to get, kind of, separated and 11 ground up -- 12 A. Yeah. 13 Q. -- and brought back -- 14 A. Yeah. 15 Q. -- has that been the case from the '50's until 16 Teknor ceased making that sort of hose? 17 A. Number 1, in the '50's garden hoses typically 18 were not reinforced so it would have gone back 19 into the process and just got ground up. There 20 was no point of separating it. Certainly, in the 21 '70's, we were sending it to the outside to have 22 it separated. And then -- even at one point in 23 time, we did some of the separation ourselves, 24 but I don't -- I don't know what the time frame 25 is of that and it was for a very short period of

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202 1 time because, quite frankly, we didn't do it very 2 well. So -- 3 Q. Were there some sections, though, of reject hose, 4 off spec hose, that would go in the dumpster at 5 times, the roll-off? 6 A. Not as a normal practice, but would there be a 7 piece of hose in there? Possibly. 8 Q. What about big sections of hose? 9 A. That would be very doubtful. 10 Q. Are you aware of whether at the -- you know, this 11 case -- this litigation involves the J.M. Mills 12 landfill in Cumberland, Rhode Island. Are you 13 aware of where that's located? 14 A. Yes, I am. 15 Q. Off Mendon Road? 16 A. Yes, I am. 17 Q. Behind the Stop & Shop -- between the Stop & Shop 18 and the -- 19 A. I don't know that kind of detail, but -- 20 Q. -- Blackstone River? 21 A. Generally, yes. 22 Q. Are you aware that during the course of the 23 remedial investigation trenching in areas of the 24 J.M. Mills landfill found huge sections of buried 25 discarded sections of --	204 1 Q. Well, the ultimate end composition of a PVC 2 pellet, is there a high amount of I guess I want 3 to say chlorides or chlorine in it? 4 A. Well, certainly there's chlorine in the PVC 5 molecule. I can't tell you exactly what 6 percentage it is by weight, but there is chlorine 7 in the PVC molecule. The PVC molecule is 8 extremely -- the reason people use it is because 9 it's a very stable molecule. It does not want to 10 give up that chlorine readily. Doesn't want to 11 give up anything readily. 12 Q. Okay. Let's go to Exhibit 3 and I want to ask 13 you some questions, generally, first about 14 Exhibit 3. The first page of Exhibit 3 is signed 15 by David Yopak. Do you see that? 16 A. Yes. 17 Q. Do you know Mr. Yopak? 18 A. Yes, I do. 19 Q. When you started at the company in 1978, was 20 Mr. Yopak at the company? 21 A. No, he was not. 22 Q. When did he come to Teknor Apex? 23 A. I think he came, I believe, either '98 or '99. 24 Probably not much earlier than this. 25 Q. And do you know what his background is
203 1 A. I was not aware of that. 2 Q. -- garden hose? 3 A. I was not aware of that. 4 Q. At any point in time, have you ever seen sections 5 of hose in the dumpster? 6 THE WITNESS: Have I personally seen? 7 MR. MURPHY: Yes. 8 A. Probably not because I typically didn't look 9 in the dumpster. 10 Q. Do you know whether there was a period of time 11 when the reinforced hose -- when they were making 12 reinforced hose, but -- 13 A. Yes, sir. 14 Q. -- they did not yet have an arrangement to send 15 it out to get it separated? 16 A. Not in my time frame. 17 Q. Do you know, what about prior to 1978? 18 A. I do not. 19 Q. The PVC products that were created, was there a 20 significant amount of -- and forgive me for not 21 having kind of a chemical background, but is 22 there a significant amount of chloride in that or 23 chlorine? 24 THE WITNESS: What do you mean by 25 "significant"?	205 1 educationwise and trainingwise? 2 A. His background is in EHS. 3 Q. How old is he? 4 A. 50. Around 50. I don't know exactly. 5 Q. All right. 50-something? 6 A. Yeah. 7 Q. All right. I gotcha. Were you asked to 8 participate at any level in providing information 9 for the 104(e) response that's marked as 10 Exhibit 3? 11 A. I probably was. Obviously, I was copied on 12 this, you can see right here. And David worked 13 for me, at that point in time. And so, yeah, I'm 14 sure that we discussed it from time to time. 15 Q. Do you understand the significance, though, of 16 the 104(e) -- 17 A. Yeah. 18 Q. -- from the EPA? 19 A. I believe so, yeah. 20 Q. When you said David worked for you, I'm assuming 21 that if he worked for you were, you aware that at 22 some point in 1999 EPA in Boston, Region One, 23 served this -- 24 A. Yeah. 25 Q. -- demand on Teknor Apex saying we need a bunch

206 1 of information from the company, technical 2 information -- 3 A. Yes. 4 Q. -- are you aware of that? 5 A. Yes, I am. 6 Q. Who received that when it first came in? 7 A. I do not know. 8 Q. How were you made aware of it? Do you remember? 9 A. Probably David probably told me. 10 Q. Okay. And Mr. Fain, Jonathan Fain in 1999, he 11 was the president of the company? 12 A. Yes. 13 Q. And CEO? 14 A. At that time, I don't know if he was president 15 and CEO. Might have been just president at that 16 time. 17 Q. All right. Was he aware that it had come in? 18 A. I would think so, yes. 19 Q. Were there discussions about the level of concern 20 the company had over getting a -- 21 A. There always is. 22 Q. -- demand? 23 A. There always is, yes. 24 Q. Well, has Teknor Apex received 104(e)'s before at 25 other sites?	208 1 A. No. 2 Q. Do you know whether Teknor Apex received what's 3 known as a general notice letter from the EPA? 4 A. I don't know what a general notice letter is. 5 I don't know whether we received it or not. 6 Q. Are you aware of whether the company's ever 7 received a letter from the EPA saying, "hey, we 8 read your 104(e), we've looked at the evidence, 9 and it's our position that you're one of the 10 parties, one of many, but one of the parties 11 that's responsible because we believe your waste 12 ended up at the site"? 13 A. Yes. 14 Q. Was there an awareness at the company at the time 15 this 104(e) was -- the demands were first 16 received that you might get one of those letters, 17 at some point, with the EPA accusing Teknor Apex 18 of being responsible for some of the conditions 19 at the site? 20 A. Yes. 21 Q. So in light of that, I'm assuming Teknor Apex 22 took this 104(e) very seriously? 23 A. Yes. 24 Q. Okay. And, in fact, let's go to the second page 25 of this document. There's a declaration by
207 1 A. Yes, we have. 2 Q. Do you remember the names of the other sites that 3 you've gotten 104(e)'s for? 4 A. I can think of a couple, the Schpack landfill 5 (phonetic spelling), Centerdale Manor and there's 6 one at, I think, Coventry landfill. Those are 7 the ones that I'm at least somewhat familiar 8 with. 9 Q. And in each of those instances, did Teknor Apex 10 generate -- create a 104(e) response? 11 A. I believe so. 12 Q. All right. Typically, in the demand letter, the 13 EPA explains the site generally, tells you about 14 the J.M. Mills site. Did the company have an 15 awareness that the EPA was asking for information 16 because they believed that Teknor Apex may have 17 had some of their waste brought to the site? Is 18 that your understanding -- 19 A. That was my understanding. 20 Q. -- of their allegation? 21 A. That was my understanding. 22 Q. There's another document that the EPA sends to 23 some companies after the 104(e) process is 24 completed called a general notice letter. Have 25 you ever had heard of one of those before?	209 1 Mr. Fain -- 2 A. Uh-huh. 3 Q. -- indicating that under penalties of perjury, 4 the 104(e) response that follows is true, 5 complete and correct; is that right? 6 A. That is correct. 7 Q. So the company put together this response and 8 then they handed it -- it was handed to the 9 president of the company who signed it under 10 penalties of perjury, correct? 11 A. That is correct. 12 Q. So I'm assuming everybody that works for Mr. Fain 13 wanted to make sure that whatever they put in 14 this was the best information that the company 15 had at the time? 16 A. To the best of their knowledge, I'm sure 17 that's what they tried to do. 18 Q. Okay. Good. Now, let's go to the next page. 19 There's a couple people here I just want to get a 20 sense for. Page -- I'm going to defer to the 21 TA pages, Page 8. 505 Central Avenue, which 22 is -- that's Attleboro, correct? 23 A. No, that's Pawtucket. 24 Q. Pawtucket. Okay. Who's Diane Dandeneau? 25 A. She was the environmental manager.

210 1 Q. Do you know how long she had been environmental 2 manager? 3 A. No. She wasn't there that long, though. 4 Q. You've already told me about Mr. Yopak. 330 Oak 5 Hill Avenue is another location. I'm assuming 6 that's Attleboro? 7 A. That is correct. 8 Q. And there was a Jeremy LaFrancois? 9 A. Correct. 10 Q. What was his role at that time? 11 A. He was the environmental person at that site, 12 yes. 13 Q. And then for the Cumberland location, 20 14 Industrial Road, there was a Lorraine Braunsdorf? 15 A. Yes. 16 Q. What was her role? 17 A. She was actually located in the Pawtucket 18 facility, but she had some responsibilities, 19 seeing we just acquired it, to oversee 20 environmental issues at that plant since we 21 acquired it. 22 Q. And when Teknor Apex acquired Custom Color -- 23 A. Yes. 24 Q. -- did it retain most of the employees that 25 worked there?	212 1 Q. States that in January of 1985, respondent, which 2 is Teknor Apex, acquired the stock of Custom 3 Color, Inc. 4 A. Okay. 5 Q. Is that your understanding of what the nature of 6 the transaction was? 7 A. As I said earlier, I was really not part of 8 that transaction. I can read what it says here, 9 but I really wasn't part of that transaction so I 10 can't really speak to the legal details of the 11 acquisition. 12 Q. Have you ever heard of the term "asset purchase"? 13 A. Absolutely. 14 Q. Do you have kind of a layperson's working 15 knowledge of the difference between a purchase of 16 stock versus an asset purchase? 17 A. Yes, I do. 18 Q. And, again, I heard your answer that you just 19 gave that you don't know, kind of, the legal 20 niceties, but was it your understanding that, 21 generally, the acquisition was not an asset 22 purchase deal? 23 A. I really wasn't involved in that acquisition. 24 And in reviewing these documents, you know, I had 25 piles of them, I'm not sure I read that exact
211 1 A. I believe so, yes. 2 Q. So there wasn't a major shift where all the 3 Custom Color employees were asked to leave and 4 new people came in? 5 A. That's correct. 6 Q. So for lack of a better word, is it your 7 understanding that the people that worked there, 8 the ones that had some tenure anyway, at least 9 had some knowledge and memory as to how Custom 10 Color operated in the years prior to Teknor 11 taking it over? 12 A. Yes. 13 Q. And do you know whether Lorraine Braunsdorf and 14 Mr. Yopak questioned those people about what 15 happened to Custom Color during what this demand 16 called the relevant period? 17 A. I'm sure they did. 18 Q. Okay. If we can flip to -- give me one second 19 here, flip to Page 00018. 20 A. Okay. 21 Q. At the top of the page, it starts with Section 22 small i. 23 A. Uh-huh. 24 Q. And then Roman Numeral 4, IV? 25 A. Yeah.	213 1 paragraph yesterday. 2 Q. Okay. 3 A. Certainly it says it was a stock transition. 4 I have no reason to believe this is incorrect, 5 but I don't absolutely know. I can't -- I can't 6 testify to that. 7 Q. Okay. Now, by 1999, when this came out -- 8 because I know you're currently a vice 9 president -- 10 A. Yeah. 11 Q. -- and you were senior vice president for five or 12 six years before that and you said you were a 13 Vice President of Manufacturing -- 14 A. Right. 15 Q. -- from 1991 to the late-'90's? 16 A. Right. 17 Q. So you were an officer of the corporation by the 18 time this came, correct? 19 A. By the time this came in. But if we're 20 referring to the transaction in 1985, I was a -- 21 I was a nothing. 22 Q. Understood. Understood. But when this demand 23 came in, you were an officer? 24 A. Yes, I was. 25 Q. Was there a discussion of -- when the questions

214 1 came about Custom Color about, "hey, when we 2 bought that company in '85, did we take on their 3 liabilities?" 4 A. There probably was, but I -- I really can't 5 testify to it because I just don't remember. 6 Q. Okay. So as you sit here today, you don't have 7 knowledge one way -- just let me finish the 8 question -- one way or the other as to whether 9 Teknor Apex, when they acquired Custom Color, 10 acquired whatever environmental liabilities the 11 old company had? 12 A. I do not know that. 13 Q. Okay. Let's go to Page 20 and specifically Roman 14 Numeral 6, which starts, "The nature of the 15 written documents reviewed." Do you see that? 16 A. Yeah. 17 Q. Okay. It says, "The nature of the written 18 documents reviewed are related to waste handling 19 at the facility." These documents date back to 20 1980. 21 A. Okay. 22 Q. Do you see that? 23 A. Yes, I do. 24 Q. Now, is that for any one particular facility or 25 is it -- let's go back one page. Are we talking	216 1 handled at Pawtucket prior to 1980? Do you have 2 any knowledge as to whether any such documents 3 existed at the time this 104(e) was responded to? 4 A. As you said earlier, we took this very 5 seriously and, obviously, Ron had looked into 6 this. And I'm not aware of any documents either 7 in my discussions with these people or prior to 8 1980 regarding waste. 9 Q. Was there a document retention policy at Teknor 10 Apex at the time you responded to this in 1999? 11 A. No. 12 Q. So there was no stated period of time at the 13 company as of 1999 where after X number of years 14 documents were required to be destroyed? 15 A. Not -- not as of 1999. No, there was not. 16 Q. Do you know whether a search was made to try to 17 find waste handling documents for the Pawtucket 18 facility prior to 1980? 19 A. Yes, I do. 20 Q. And how do you know that? 21 A. Because I asked. 22 Q. And what was the response? 23 A. Yes, they did. 24 Q. They did exist? 25 A. No, they did look for them.
215 1 now just about 505 Central Avenue? 2 A. That's what it appears, yes. 3 Q. Which is Pawtucket, correct? 4 A. Yes. 5 Q. All right. So for Pawtucket, the 104(e) response 6 says that there were documents concerning waste 7 handling that went back to 1980. 8 A. Okay. 9 Q. Are those documents still in existence? 10 A. I don't know that. But according to this, it 11 sounds like they are. 12 Q. Do you know what documents those were? 13 A. I do not. I don't know what it's referring 14 to. 15 Q. I know that the following -- the schedules, there 16 are a number of waste manifests and other 17 documents in there. 18 A. That's right. 19 Q. Is it reasonable to assume that at least some of 20 these are those documents that are referred to 21 here? 22 A. I think that's very reasonable. 23 Q. All right. Now, what about prior to 1980, what 24 about waste handling documents for Pawtucket or 25 any document that would reflect how waste was	217 1 Q. And what was the result of the search? 2 A. They did not find any. 3 Q. Okay. Was any inquiry made as to why they -- why 4 they couldn't be found? 5 A. I just -- no, I didn't make any inquiry. I 6 just assumed, you know, given that they would 7 then be, what, 20 years old that they just didn't 8 exist. 9 Q. Let's go to Page 00023. Subsection D at the 10 bottom of the page states that "prior to 1988, 11 each department had supervisors who handled 12 disposition of waste from that department." Do 13 you see that? 14 A. Uh-huh. 15 Q. Is that an accurate understanding of how waste 16 was handled at the Pawtucket facility when you 17 started in 1978? 18 A. In 1978, I was a project engineer, so I was 19 not, Number 1, intimately involved in that. 20 Q. Okay. 21 A. And it sounds very reasonable, though. 22 Q. So you don't have any reason to dispute the 23 statement in there? 24 A. I don't have any reason to dispute the 25 statement, no.

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218 1 Q. And let's go to the next page, 00024, where a 2 number of different types of waste are listed. 3 A. Yeah. 4 Q. "Burnt rubber batches." Do you see that? 5 A. Yeah. 6 Q. What is burnt rubber? 7 A. In mixing a batch of rubber, let's say the 8 temperature goes higher than what you would want 9 it to get to and, therefore, the material 10 degraded in some way, shape or form and wasn't 11 good for continuing the process. 12 Q. Okay. But by burnt, does that not -- is that not 13 meant to refer to actually a charred piece of 14 rubber that's actually been ignited? 15 A. It would not necessarily have been ignited. 16 Probably highly unlikely that it got -- that it 17 ignited, but it probably would smolder. It would 18 be very hot, that's for sure. 19 Q. Okay. So the rubber would at least get to a 20 point where it would begin to smolder? 21 A. It would smolder. You would not see a flame 22 or anything of that nature. 23 Q. And this is mostly rubber, natural rubber? 24 A. Mostly natural rubber, yes. 25 Q. Some synthetic rubber made from hydrocarbons?	220 1 A. Yes, sir. 2 Q. Is that what is meant by "dumpster" -- 3 A. Yes, sir. 4 Q. -- here? 5 A. Yes, sir. 6 Q. Because I know there's also small three-yard and 7 five-yard dumpsters that you'll see behind a 8 restaurant. That's not what's referred to here 9 when it says "dumpster," correct? 10 A. Not in this particular case. But in the 11 course of our conversations today, we've actually 12 referred to both of them interchangeably. 13 Q. Now, okay. Let's go to the next one, "burnt PVC 14 batches." 15 A. Uh-huh. 16 Q. How does PVC get burnt? 17 A. Same kind of thing. In terms of mixing, we 18 may go to a temperature higher than what we would 19 have liked and the material degrades. 20 Q. If I took the garden hose and overheated it, 21 would it begin to melt into kind of a denser 22 mass? 23 A. Yeah. Yes, it would. 24 Q. At some point, would it ignite? 25 A. Probably not.
219 1 A. Yes, sir. 2 Q. And was there ever any discussions of whether -- 3 do you know what PAH's are? 4 THE WITNESS: PAH's? 5 MR. MURPHY: Yeah, polyaromatic. 6 A. I'm somewhat familiar with them. I'm not a 7 chemist, but I'm somewhat familiar with them. 8 Q. Was there ever a concern in discarding the burnt 9 rubber that there might be PAH's in that burnt 10 rubber going into your waste stream? 11 A. I was not aware of that issue. 12 Q. Was there ever any testing performed -- 13 A. Not that I'm -- 14 Q. -- at any time of the burnt rubber to see whether 15 PAH's had been generated? 16 A. Not that I'm aware of. 17 Q. And where it says here "location of storage," it 18 says, "dumpster and receiving department." Fair 19 to state that the burnt rubber batches went into 20 the dumpster? 21 A. Yes. 22 Q. Now, just to clarify, when I'm saying "dumpster," 23 we've been talking about different size -- fairly 24 large containers, 30- and 50-yard roll-off 25 containers; is that right?	221 1 Q. Okay. Do you know whether PAH's are created, at 2 some point, if PVC is heated above a certain 3 temperature? 4 A. I don't know that. 5 Q. Well, it says here that location of storage is a 6 dumpster. Is it correct that the procedure was 7 any burnt PVC batches during the manufacturing 8 process were put into the dumpster? 9 A. That is correct. 10 Q. And then whoever hauled them away hauled them 11 away to wherever they took them? 12 A. That is correct. 13 Q. Waste oil, just a couple questions about that. 14 There's been quite a lot of questions about waste 15 oil. We've looked at a lot of documents both in 16 the 104(e) and in another areas. 17 Correct me if I'm wrong, there was a point in 18 time when Teknor Apex took all of their waste oil 19 and had it picked up by a couple of different 20 companies that specialized in recycling oil; is 21 that right? 22 A. That's correct. 23 Q. Do you know when that first started? 24 A. No, I do not. 25 Q. Is it your understanding that, generally, in

222 1 the -- in industry, there is a point in time 2 before which there was no kind of waste oil 3 recycling business? 4 A. Yes, I'm generally aware of that. Yes. 5 Q. And do you know what Teknor Apex did then with 6 their waste oil? 7 A. No, I do not. 8 MR. MURPHY: I just want to know if he 9 knows. 10 MR. BENIK: No, that's okay. 11 Q. There's also been -- there's some documentation 12 that suggests that there are quite a number of 13 underground storage tanks at the facility, 14 correct? 15 A. No, there are no underground storage tanks at 16 the facility at this time. 17 Q. Okay. Were there at one time, though? 18 A. Yes, there were. 19 Q. And I saw a reference that -- maybe I should wait 20 to get to my notes -- where one of the -- one of 21 the underground storage tanks contained textile 22 spirits. Have you ever heard of that phrase 23 before "textile spirits"? 24 A. I've heard of that phrase before. 25 Q. What is textile spirits?	224 1 Q. Okay. So it was a regulated material? 2 A. From an inflammability standpoint, I am aware 3 of. 4 Q. Are you aware of whether -- or what the Teknor 5 Apex did in the event of a textile spirit spill? 6 A. No. 7 Q. If there were spills of oils in the facility of 8 any type, was it -- I know you testified that at 9 times resin would be used to soak it up? 10 A. That is correct. 11 Q. But there were some references in the 104(e) that 12 Speedy Dry was also used? 13 A. I read those. 14 Q. And I'm assuming that somebody with knowledge of 15 that -- the particular facility at issue had 16 direct knowledge that at times when oil was 17 spilled at one of the Teknor Apex facilities 18 Speedy Dry would be used to absorb it and then it 19 would be put into the dumpster, correct? 20 A. That's certainly your assumption based upon 21 what is written here. That was not our practice. 22 Q. I understand what you're saying it was not your 23 practice, but you agree with me that you saw in 24 the 104(e) a statement that at times an absorbant 25 like Speedy Dry was used to clean up oil spills
223 1 A. I don't know chemically. 2 Q. Are you aware that, at some point in time, the 3 Pawtucket facility had an underground storage 4 tank that would be periodically filled with 5 textile spirits? 6 A. Yes. 7 Q. What were textile spirits used for? 8 A. They were used in the tread rubber operation 9 in making an adhesive that was put on the back of 10 the tray. 11 Q. Do you know what the constituent components of 12 the adhesive were? 13 A. Rubber, solvate rubber into the textile 14 spirits. I'm not sure what else was in it. I 15 know rubber was in it. 16 Q. So the textile spirits were a solvent of sorts? 17 A. That's correct. 18 Q. And it would do something to the rubber to break 19 it down and make it sticky? 20 A. That's correct. 21 Q. All right. Were textile spirits a material that 22 was regulated by OSHA as a product that could 23 create human health adverse impacts? 24 A. I don't know about human health. It certainly 25 was flammable.	225 1 and that that absorbant was thrown into a 2 dumpster, correct? 3 A. That's what the 104(e) states. 4 Q. And this was a document that Mr. Fain signed 5 under penalties of perjury, correct? 6 A. That's correct. 7 Q. And it was a document carefully vetted -- 8 A. That's correct. 9 Q. -- page by page before it was sent to the EPA? 10 A. I would say so. 11 Q. And despite that, you still think that a 12 statement in there was wrong? 13 A. I'm just trying to qualify the statement. 14 That's what I'm trying to do. 15 Q. But you don't have any basis, then, to disagree 16 with the research in this document that indicates 17 that at times Teknor Apex used absorbant to clean 18 up oil spills and that it was then disposed of in 19 the dumpster? 20 A. Certainly, according to the 104(e), that's 21 what it states. But, again, I will state that 22 was not our normal practice, that was not our 23 accepted practice as to how to deal with that on 24 an ongoing basis. 25 Q. Unused raw materials are the next category.

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226 1 Various bags, metal drums and cardboard drums 2 from each department went into the dumpster, 3 correct? 4 A. That statement is not completely correct. 5 Q. Well, it says -- let's look at the document that 6 Mr. Fain signed under the penalties of perjury -- 7 A. Yeah. 8 Q. -- that the company took very seriously. 9 A. Yeah. 10 Q. It says, "Unused raw materials as a" -- 11 THE WITNESS: Where are you reading 12 from, sir? 13 MR. MURPHY: I'm on Page 00024. 14 A. Yeah. 15 Q. There's a box at the top. 16 A. Uh-huh. 17 Q. Under "Category Waste Name," go down four 18 categories. "Unused Raw Materials." 19 A. Yes, sir. 20 Q. Do you see that? 21 A. Yes. 22 Q. Type of container stored in -- 23 A. Yeah. 24 Q. -- various bags, metal drums, cardboard drums, 25 right?	228 1 difficulty with unused raw materials only in the 2 sense that we talked about earlier in the fact 3 that there was a residual inside of the bag, yes, 4 to that extent, but to the extent that you took a 5 bag of material and threw it in the dumpster 6 because you aren't going to use it, I would not 7 agree with that. 8 Q. So you disagree with this -- 9 A. No. 10 Q. -- assertion? 11 A. No, I don't disagree with this. I agree with 12 what I just previously said. 13 Q. Okay. You don't know who proofread this 14 document? 15 A. I'm sure I probably was one of the people that 16 proofread the document. 17 Q. Okay. Let's keep flipping through this. Let's 18 go to Page 00030. 19 THE WITNESS: 00030? 20 MR. MURPHY: Yeah. It's the beginning 21 of the waste survey, the informational waste 22 survey. 23 A. Yeah. 24 Q. There were some answers you had to some of 25 Mr. Danley's questions where, I got a sense
227 1 A. Yes, I did. 2 Q. Located in each department? 3 A. Yes. 4 Q. Location of the storage of this waste. 5 A. Yes. 6 Q. This is all about waste. 7 A. Yeah. 8 Q. Dumpster. 9 A. Yes, I read that. 10 Q. So you don't disagree with me that in this 104(e) 11 response, the company stated to the EPA that 12 unused raw materials that were stored -- that 13 were in bags, metal drums and cardboard drums 14 went into the dumpster? 15 A. That is what this says, that is correct. 16 Q. And I think you indicated you had difficulties 17 with that statement, as to your understanding, 18 correct? 19 A. That is right. I would take exception to 20 metal drums because we -- we had -- metal drums 21 did not go in the dumpster. 22 Q. All right. But, otherwise, at times there were 23 unused raw materials that just went into the 24 dumpster in their storage containers, correct? 25 A. That -- that -- again, I would have some	229 1 anyway, that it was your understanding that you 2 only had to respond to the waste survey if there 3 was a category on the chart that you thought your 4 waste fit in; is that right? 5 A. That would have been my understanding. 6 Q. Okay. Do you know whether Mr. Yopak and all the 7 other environmental health and safety people 8 adopted that methodology of responding to the 9 waste survey? 10 A. I do not know that. 11 Q. Do you know what the EPA guidelines were for how 12 you're supposed to fill a waste survey out? 13 A. No, I do not. 14 Q. Okay. The very last page of this waste survey, 15 which is -- if you want to look at Page 00035. 16 THE WITNESS: 00035? 17 MR. MURPHY: I don't know, five, six 18 pages down, kind of the last page of their 19 standard chart. 20 A. Yeah. 21 Q. Do you see that? 22 A. Yeah. 23 Q. There's a section at the end that says "other." 24 Do you see that? 25 A. Yeah.

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230 1 Q. Do you know what that category was for? 2 A. Everything else, I guess. 3 Q. So as you sit here today, is it your 4 understanding that Teknor Apex was supposed to 5 list every waste material disposed of or 6 generated at the facility? 7 A. And to the best of our knowledge, I believe 8 we -- I believe that we have. 9 Q. Well, let me ask you this: Where is lead listed 10 here? Correct me if I'm wrong, lead was in the 11 waste stream that left the plant, correct? 12 A. Only as -- as I've stated earlier -- I mean, 13 when we answered this, to the best we understand 14 how you're supposed to answer this, when you 15 empty a bag and you put it in the dumpster, 16 according to these empty container rules, it's a 17 bag, it's not lead. 18 Q. Well, but there's -- 19 A. So that's the context that we attempted to 20 answer these questions. 21 Q. Okay. 22 A. So that's why we answered the way we did. 23 Q. Okay. So it was context, but we just saw a few 24 pages earlier that this same 104(e) says that 25 unused raw materials were thrown into the	232 1 we would have put the lead in there, we would 2 have said, okay, we had floor sweepings. Yeah, 3 we swept the floor, that went in the dumpster. 4 We had empty bags, that went in the dumpster. 5 Q. Well, take a look under -- let's look at the 6 waste survey. It says "substance," right? 7 A. Yeah. 8 Q. Let's go back to Page 00030, if you would. 9 A. Okay. 10 Q. Okay. There's substance, correct? 11 A. Yes. 12 Q. Next block says, "physical state when disposed 13 of" -- 14 A. Correct. 15 Q. -- right? 16 Is it liquid, sludge, whatever, right? 17 A. Uh-huh. 18 Q. Now, let's look at the third category, "trade 19 name, chemical composition." 20 A. Yeah. 21 Q. What was your understanding of what chemical 22 composition -- what the inquiry was that the EPA 23 was asking of Teknor Apex? 24 A. What the chemistry was of that compound. 25 Q. What's in it?
231 1 dumpster in bags and drums. 2 A. That is correct. 3 Q. Okay. And the raw materials included pretty much 4 the -- most of the compounds that Mr. Danley 5 asked you about earlier? 6 MR. BENIK: Objection. 7 Q. Yes? 8 MR. BENIK: If you know. I mean, I -- 9 pose the question again. 10 MR. MURPHY: Well, we can go back 11 through all the various raw materials if you 12 want. 13 MR. BENIK: Well, I thought your 14 question is every one of those compounds were 15 tossed as raw materials in the dumpster. Is that 16 your question? 17 MR. MURPHY: Yeah. 18 MR. BENIK: Can you answer that? 19 THE WITNESS: No, I cannot. I cannot 20 answer that question as stated. 21 Q. Well, but some dust that had lead in it did end 22 up in the dumpsters? 23 A. Yes. 24 Q. Okay. So lead was a part of your waste stream? 25 A. Not in the reference to this, because, again,	233 1 A. Yeah. 2 Q. What's in the waste, right? 3 So is it your understanding that the EPA 4 wanted to know, we want to know all the 5 constituents of whatever was in each category of 6 waste, correct? 7 MR. BENIK: Objection. You can answer. 8 The document speaks for itself. I mean -- 9 Q. I want to know what -- you said that you probably 10 proofread it. You were copied. 11 A. Well, I can only tell you how I interpret it. 12 How you interpret it, I'll have to ask you the 13 questions. Okay? 14 My interpretation was when we were putting an 15 empty bag in there that it was an empty bag, and 16 there are EPA rules about empty bags. We felt we 17 were adhering to those empty bags rules, 18 therefore, we said we put a bag in there. 19 Q. Well, what about the dust? You said that -- 20 there was a discussion -- Mr. Danley questioned 21 you earlier when there was an estimate from a 22 separate document filed with AMEGA (ph) in 23 Attleboro that 400 pounds of dust were generated 24 and thrown away daily as part of the waste stream 25 and you disagreed with that, correct?

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234 1 A. That's correct. That's a document I hadn't 2 seen until today. 3 Q. I understand. But somebody who was knowingly 4 reporting to an environmental regulatory agency 5 who was staring at Teknor Apex took the position 6 that 400 pounds of dust were generated daily and 7 discarded, correct, somebody did? 8 A. Somebody did, obviously. 9 Q. What was the guy's name? Mr. McKeen? 10 A. That's correct. 11 Q. So whether he did a good job or bad job, that's 12 what he told Massachusetts DEP, right? 13 A. I guess he told Massachusetts EPA. When I 14 looked at that document, I don't think it said 15 where. It's just a copy. I don't know where 16 this thing -- I don't know if you guys, you know, 17 wrote it up this morning. I don't know. I 18 haven't seen it until today. 19 Q. All right. Fair enough. But you disagree -- 20 THE WITNESS: What do you want me to 21 say? 22 MR. MURPHY: That's all right. You 23 disagree. 24 Q. You think it was something more like 100 to 25 200 pounds?	236 1 MR. BENIK: Jonathan, I object again. 2 It's not sweepings. It's dust from the dust 3 collector that's referred to here. It is not 4 sweepings, so, please, I don't want to cut you 5 off here and I -- 6 MR. MURPHY: Greg, if my question's not 7 appropriate, I invite clarification. 8 MR. BENIK: Okay. I just want to be 9 clear on the record because it's late, my witness 10 has been here a long time, there's been very few 11 breaks, we've been very cooperative here. Let's 12 try to wrap this up. He has to leave. 13 MR. MURPHY: I'm working on it. 14 MR. BENIK: Okay. Thank you. 15 Q. So that's dust collector only, correct? 16 A. That's what I believe he is referring to. 17 Q. And that's different from floor sweepings? 18 A. That is correct. 19 Q. But floor sweepings were different from residue 20 in raw material bags, correct? 21 A. Yes, I would consider that different, yes. 22 Q. Floor sweepings would be swept up and thrown into 23 the dumpster? 24 A. Yes, sir. 25 Q. Where does it say floor sweepings in this?
235 1 A. That is correct. And I also went on to say 2 that it did not go in the dumpster. We used that 3 in the production of garden hose. 4 Q. So you disagree with a lot of what Mr. McKeen 5 said, if, in fact, that's what he said? 6 MR. BENIK: Jonathan, just a minute. 7 The document doesn't say that material went into 8 the dumpster. It says it was discarded. So, you 9 know, if you're going to question him about that, 10 I'd like some precision about that. I'm giving 11 you a lot of leeway here. 12 Q. Well, you said it was discarded. 13 A. No, I didn't say it was discarded. 14 Q. All right. Okay. 15 MR. MURPHY: Well, Greg, thanks for 16 pointing that out because that's what I thought, 17 too, that it was discarded and you said it was 18 reused, right? 19 MR. BENIK: Well, the document says it 20 was discarded. His testimony is it was reused. 21 THE WITNESS: I said it was reused in 22 garden hose. 23 Q. But some of that dust from the sweepings, whether 24 it was 400 pounds a day, 200 pounds a day or a 25 smaller quantity --	237 1 A. I don't think it does. 2 Q. So nowhere in this waste survey do you indicate 3 that floor sweepings that contained all those 4 various metals that we talked about went into 5 your waste stream, correct? 6 A. I don't see it in here, no. 7 Q. All right. So the EPA was not informed that part 8 of your waste stream was floor sweepings that had 9 dust with various metals in it? 10 A. In the context of this 104(e), yes. 11 Q. All right. So would you agree that there's an 12 omission in the waste survey with respect to 13 certain chemical compounds that were a part of 14 your waste stream? 15 MR. BENIK: Objection. 16 MR. MURPHY: He can't give you an 17 answer. 18 THE WITNESS: I can give you an answer. 19 Do you want me to answer? 20 MR. MURPHY: You have to answer. 21 MR. BENIK: If you can answer, you have 22 to answer. Go ahead. 23 A. I look at this. And using your definition of 24 how this should be filled out, then there would 25 be an omission. Without going back and reading

238 1 what -- exactly what the context are of the 2 questions and the rules regarding the questions, 3 I don't know whether it's an omission or not. 4 Q. Let's go to the second category at Page 00030, 5 asbestos? 6 A. Yes. 7 Q. That went into the dumpster, right? 8 A. According to this, it did. 9 Q. Okay. So somebody who filled this out, Diane 10 Dandeneau, did some research, I'm assuming, made 11 inquiry as to where asbestos went that came from 12 the plant and told the EPA that it went into the 13 dumpster, correct? 14 A. I made some inquiries into this specific thing 15 and in this specific item there were some 16 assumptions made. Asbestos was never used in the 17 production of any materials ever made at Teknor 18 Apex in Pawtucket, Cumberland and/or Attleboro. 19 However, they made the assumption that during the 20 relevant period asbestos was put into many 21 materials that you have in your home and they're 22 in this building and that, as such, it would be 23 impractical to say that we did not put asbestos 24 in the dumpster because we built things, we fixed 25 things, we did all sorts of things. And I'm	240 1 Q. Absorbants, next one. 2 A. Yes. 3 Q. List the trade name as Speedy Dry, correct? 4 A. Yes. 5 Q. So the 104(e) states that Speedy Dry was used as 6 an absorbant for spills and leaks and was thrown 7 into the dumpster. 8 A. That is what the 104(e) says, but, again, I 9 will say again and I will repeat again that that 10 was not our normal practice. 11 Q. Now, under "chemicals," it just says "various." 12 Let's go to the next page chemicals, waste, 13 solvents, carbon black and solid, and I guess you 14 break those two down, so let's go to waste 15 solvents. It says, "various." 16 A. Yeah. 17 Q. Is there any further delineation other than just 18 various? 19 A. I -- I'm sure there could be. I don't know, 20 you know, what all the solvents could be. We 21 talked about a solvent earlier, you know, such as 22 textile spirits. There could be solvents from 23 the laboratory. There could be a whole variety 24 of solvents. 25 Q. Under "chemicals," it says "carbon black, solid,
239 1 sure, as a result of that, there was a material, 2 maybe it was a piece of insulation, maybe it was 3 a piece of floor tile, maybe it was a piece of 4 wallboard that potentially would have contained 5 dust -- contained asbestos given the time period 6 that it was constructed. 7 Q. But is that your conclusion after talking with 8 people in getting ready for this deposition? 9 A. That was -- that was -- I had those exact 10 conversations as to, you know, why did you answer 11 these questions in that particular form. 12 Q. So you're telling me that people told you "we're 13 not even sure that asbestos was in our waste 14 stream, but we're going to tell the EPA that we 15 had asbestos in our waste stream when we put it 16 in the dumpster"? 17 A. They said that because they knew that we would 18 have taken building materials that we would have 19 been using, and -- use the case of insulation. 20 During the relative time period, it was very 21 common that asbestos would be in insulation and 22 we would have, in the course of doing insulation 23 jobs, thrown scrap pieces into the dumpster. So, 24 therefore, they made that -- in the spirit of 25 full disclosure, they put that in there.	241 1 unused material thrown in dumpster"? 2 A. Uh-huh. 3 Q. Do you see that? 4 A. Uh-huh. 5 Q. What is carbon black? 6 A. Carbon black is a powder made of carbon. I 7 mean, I think it's 100 percent carbon, as a 8 matter of fact. 9 Q. Let's go to the next page. 10 A. Okay. 11 Q. "Laboratory waste, liquid solids." 12 A. Yeah. 13 Q. It says, "disposed in sink"? 14 A. Yeah. 15 Q. If you dumped laboratory waste at the Pawtucket 16 facility in the sink, where did it end up? 17 A. Ended up in the wastewater treatment of the 18 City. 19 Q. There wasn't a separate wastewater treatment 20 system just for the plant? 21 A. Not back at this time. Today there is. 22 Q. Okay. Do you know what laboratory wastes were 23 generated other than -- I mean, under the second 24 section, which is list the chemicals, it doesn't 25 say what it was?

242 1 A. I can't sit here and give you an exhaustive 2 list of what they were. 3 Q. Are you aware of whether methylene chloride was 4 used? 5 A. Methylene chloride would have been one of 6 them. Yes, it would have. 7 Q. And you knew that back then methylene chloride 8 was one of the -- 9 A. Whether I knew that back then or not, I don't 10 know. I possibly did, but, yeah, it would have 11 been -- that would have been a typical item. 12 Q. Paint and coating wastes? 13 A. Yeah. 14 Q. Again, those were, what, the pigments that we 15 were talking about, the coloration or was that 16 something else? 17 A. I think what they're referring to here is that 18 we would have taken empty paint cans and thrown 19 them in the dumpster. I think that's what 20 they're referring to. I don't think they were 21 referring to pigments. 22 Q. Well, it says here the physical state, some of it 23 was liquid? 24 A. Correct. 25 Q. So some liquid paint waste went to the dumpster?	244 1 Q. So I understand that in responding to the 104(e), 2 Teknor Apex made a decision that certain aspects 3 of its waste you didn't believe were reportable? 4 A. Not in the context -- at least in my 5 understanding of it, not in the context of an 6 empty container. It was an empty container. 7 Q. Well, where are the floor sweepings listed? 8 A. They're not. 9 Q. And, again, I guess you said you disagreed that 10 the dust collection dust, you disagreed that that 11 was discarded at all, correct? 12 A. Excuse me one second. Okay. Go ahead. 13 Sorry. Sorry. 14 Q. You disagreed that any of the dust from the dust 15 collection system was ever discarded? 16 A. No, that's not what I said. 17 Q. Okay. What did you say? 18 A. What I said was the dust from the dust 19 collection system in the vinyl operation was not 20 discarded, it was put into the garden hose 21 operation. I said the dust from the rubber and 22 the soling operation went to the landfill. 23 Q. And most of that was natural rubber, the dust, 24 the rubber dust? 25 A. You'll have to qualify "most."
243 1 A. That's what I said. I would think that there 2 were empty paint cans. I'm sure there was 3 residuals in them that were liquid. I wouldn't 4 doubt that. 5 Q. Now, the pigments that you talked about that you 6 used to color the pellets -- 7 A. Yeah. 8 Q. -- those contained various metals, correct? 9 A. Some of them did, yes. 10 Q. But you didn't put them under a separate listing 11 under pigments for paint and coating waste? 12 A. No, they did not. 13 Q. Was that because you didn't think it belonged in 14 this category? 15 A. We didn't think it belonged under paints and 16 coatings. 17 Q. Where did you think it belonged. 18 A. Well, Number 1, I think that, again, it was 19 just as a residual. It would have been, you 20 know, an empty container. So in the context that 21 we were answering this, we didn't think that that 22 was reportable. 23 In the context of it being in a floor 24 sweeping, you know, possibly should have been 25 under floor sweepings.	245 1 Q. Can you express a percentage in 1978 of how much 2 of the rubber dust from sanding was natural 3 rubber versus synthetic? 4 A. No, I cannot. 5 Q. Some of it synthetic? 6 A. Yes. 7 Q. So some of it was hydrocarbon-based material that 8 had been turned into rubber dust? 9 A. It was still rubber dust, though. It doesn't 10 change chemical form just because it was buffed 11 off. 12 Q. Were there ever any discussions internally at 13 Teknor Apex as to how rubber dust behaves once 14 it's land filled? 15 A. No. 16 Q. Ever have any discussions at Teknor Apex as to 17 how discarded PVC garden hose would behave 18 once -- you know, interact with the environment 19 once it's discarded? 20 A. Yes. 21 Q. And what were the discussions about that? 22 A. Discussions were how it would react in a TCLP 23 test, what things may or may not come out of the 24 garden hose. 25 Q. Was there ever any discussion about the

246 1 generation or creation of dioxins over time after 2 disposal of a PVC-based garden hose? 3 A. No. 4 Q. Let's, if we could, I'm going to move very 5 quickly. I'm going to get through most of this, 6 then I just have some follow ups with notes. 7 Page 00112. I think we're now at Attleboro. 8 A. Okay. 9 Q. Let's go to the page right after it, 114. 10 A. Okay. 11 Q. The soybean oils, epoxidized soybean oils? 12 E-P-O-X-I-D-I-Z-E-D. 13 A. Yes. 14 Q. Were they a fairly late generation kind of oil 15 used in plasticizers? 16 A. I don't believe so. 17 Q. Were soybean oils used in the '50's? 18 A. I can't conclusively say that, but I think 19 that they were. 20 Q. What does the soybean oil do? 21 A. It's a -- what we refer to as a long-term 22 stabilizer in a product for heat stabilization. 23 Q. Do you know whether, at some point, soybean oil 24 became the -- a preferred long-term stabilizer 25 that was used to replace an earlier long-term	248 1 used. 2 A. Okay. 3 Q. Were any of those of concern to the EPA? 4 A. Yes. 5 Q. Which ones? 6 A. Di(2-ethylhexyl)phthalate. 7 Q. So some of that would have ended up in the 8 dumpster? 9 A. Inside of a pellet, yes. In the form of a 10 pellet. Not as a liquid. 11 Q. What happened with the liquid phthalates that 12 were used in the process. I mean, was there zero 13 waste generated during the course of the 14 phthalates? 15 A. As a liquid, yes, I would say there would be 16 zero waste. As a pellet or as a dust that we've 17 already described earlier, certainly there is a 18 waste, but at that point in time the liquid is in 19 the pellets. Not a liquid, it's a pellet. It's 20 a solid at that point in time. 21 Q. But are you aware of anytime any of the 22 phthalates that were being used to manufacture 23 plasticizers spilling somewhere in the -- in any 24 of the plants? 25 A. Yes. As I described to Chris earlier today,
247 1 stabilizer of a different composition? 2 A. No, I'm not -- I'm not -- 3 Q. Okay. The plasticizers contained phthalates, 4 correct? 5 A. Yes, sir. 6 Q. Phthalates -- is it your understanding that 7 phthalates are semivolatile organic compounds? 8 A. Yes, I am. 9 Q. Would some phthalates have ended up in the 10 dumpster in some form? 11 A. In the form that of being in the pallet, yes. 12 Q. Okay. And are phthalates as semivolatile organic 13 compounds a regulated waste, to your knowledge, 14 under, kind of, EPA? 15 A. Some phthalates are regulated, not all. 16 Q. What about the phthalates that you used, were 17 they the type that -- were they semivolatile 18 organic compounds that the EPA had concerns over, 19 to your knowledge? 20 A. There are some -- they are semivolatile 21 organic compounds and there are some phthalates 22 that the EPA are concerned with. 23 Q. And were -- 24 A. But not all. 25 Q. Okay. But let's talk about the ones you know you	249 1 yes. 2 Q. And they would be absorbed by what? 3 A. What -- I said in the case of if we're talking 4 about -- I think we're talking in the context of 5 Hebronville, at this point in time, spills that I 6 can recall happened in the tank farm, those 7 spills ended up on the ground. We would suck up 8 the residual liquid, put it into our OGAP 9 product, and unfortunately the rest went into the 10 soil. And, therefore, we are out there 11 remediating that soil at this point this time. 12 Q. But some of that product would end up inside the 13 plant to be used in manufacturing plasticizers? 14 A. In a vessel. This operation is mostly 15 outside. 16 (Off the record.) 17 Q. Can we go to Page 00119. 18 THE WITNESS: 00119? 19 MR. MURPHY: Yes. Yes. 20 A. Yeah. 21 Q. And I believe this is still Attleboro. There's a 22 Subsection small u. Do you see that? 23 A. Yes. 24 Q. It says Teknor Apex chose the disposal location 25 for hazardous waste. The carrier chose the

250 1 location of disposal for nonhazardous waste, 2 solid waste, correct? 3 A. Okay. 4 Q. Am I correct that what you're calling 5 nonhazardous waste is the stuff that ended up in 6 the dumpster? 7 A. I believe that's what everyone's referring to. 8 Q. So regardless of what's in the dumpster, whoever 9 picked it up and hauled it away, they chose where 10 it went? 11 A. That's correct. 12 Q. And where you said Teknor Apex chose the disposal 13 location for hazardous waste, that would be based 14 on whatever period of time that the company 15 understood to be defined as hazardous waste? 16 A. Right. Not what was hazardous in 1999 but 17 what was hazardous in the period that we were 18 trying to answer this question. 19 Q. Right. So that in the '60's or the '70's, Teknor 20 Apex dealt with what was then defined as 21 hazardous waste one way and, otherwise, treated 22 it as nonhazardous waste, correct? 23 A. That's the spirit that this was answered. 24 Q. Like pretty much every other company in the 25 world?	252 1 don't understand what they did. 2 A. They made what I referred to as color 3 concentrates. In the case of Custom Color, they 4 made color concentrates in polyolefins, things 5 like polyethylene, polypropylene. They also made 6 concentrates in polystyrene and in ABS. And a 7 concentrate would be taking a pigment and mixing 8 it with a plastic carrier to form a material such 9 that the next person down the line did not have 10 to deal with the pigment as a pigment. 11 Q. So then who did Custom Color sell to? 12 A. Hundreds of different people. Any plastic 13 part that you wanted to color, that was, again, 14 polyolefin based, based on the same plastic that 15 we would put the pigment into. 16 Q. So it was for certain types of plastic? 17 A. For certain types of plastic, yes, sir. 18 Q. So you were basically doing the coloring for 19 plastic so that some other fabricator, 20 manufacturer, whatever, could take that material 21 and make whatever they wanted to make out of 22 plastic at the color that you had already colored 23 it in? 24 A. That is correct. 25 Q. And the colors, the pigmentation that you used,
251 1 A. That's the spirit that this was answered in. 2 Q. And as you sit here today, if I went year by year 3 and tried to get you to tell me what Teknor Apex 4 understood to be hazardous versus nonhazardous 5 waste, would you be able to answer those 6 questions? 7 A. I wouldn't. I mean, if we talked about the 8 last ten years, I possibly could. But if we 9 talked about 30 years ago, no, I could not. 10 Q. And my concern really is for, you know, the 11 relevant period which ends in the early-'80's. 12 A. I understand. I understand. 13 Q. And now let's go to Page 00146, which I think is 14 Custom Color. 15 A. Okay. 16 Q. Let me ask you this: Did the operations of 17 Custom Color, essentially, remain the same the 18 day after Teknor Apex bought it as the day before 19 they bought it? 20 A. Yes. 21 Q. And do you know, did the operations change 22 substantially in 1985 from the way they were ten 23 years earlier? 24 A. That I don't know. 25 Q. Can you tell me what exactly Custom Color did? I	253 1 the components or the chemicals or the compounds 2 used to do the pigmentation had a number of 3 different origins; is that right, or was it just 4 one type of material? 5 A. A number of different origins. 6 Q. And we talked a little bit earlier about some of 7 the metals like lead. Was there lead in some of 8 the components that you used -- that they used at 9 Custom Color for pigment? 10 A. At Custom Color, I'm not sure lead was one of 11 the components. Could possibly have been, but I 12 cannot absolutely say that. 13 Q. Well, on Page 00148 -- 14 A. Yeah. 15 Q. -- under "production of color concentrates, raw 16 materials are organic and inorganic pigments"? 17 A. Yeah. 18 Q. Can you give me an example of some inorganic 19 pigments? 20 A. Well, I mean, you were talking about there's 21 lead chromate, I don't know whether that's the 22 one they were referring to, but that would be an 23 inorganic pigment. Like titanium dioxide would 24 be an inorganic, very common pigment. 25 Q. And let's talk about the lead chromate. Is lead

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254 1 chromate kind of an OSHA-regulated material? 2 A. From the standpoint you're saying 3 "OSHA-regulated" materials, they may regulate 4 dust generated from those materials. Like there 5 is certainly a lead -- ambient lead level that 6 one has to maintain in an operation or below it. 7 Q. Let me ask you this: Are you aware was lead 8 chromate being used at Custom Color after you 9 got -- 10 A. I don't know. I don't know. 11 Q. Are you aware of whether lead chromate's very 12 hazardous if it comes in contact with human skin? 13 A. I am not aware of that being an extreme 14 hazard. 15 Q. Have you had occasion to, at any time recently, 16 look at an MSDS sheet for lead chromate? 17 A. Not recently, but I have looked at a lead 18 chromate MSDS sheet, yes. 19 Q. Do you know whether OSHA deemed lead chromate to 20 be a proven carcinogen? 21 A. No, I do not. Wouldn't surprise me, but I 22 don't -- 23 Q. And I'm just trying to figure out, the lead 24 chromate that was used as one of the inorganic 25 pigment components --	256 1 for quite some time, but I would -- it's been a 2 number of years, but I can't give you an exact 3 date, unfortunately. 4 Q. Why not? Why did they stop using it? 5 A. Well, we have -- we have made a major effort 6 to stop using cadmium, which we have not been 7 using now for over ten years at our Pawtucket 8 facility. We have also tried to eliminate 9 chrome. We've also tried to eliminate lead. 10 Q. Why this major effort to eliminate those? 11 A. We -- I mean, I'm very aware that cadmium is a 12 known carcinogen and certainly has a lot of 13 health effects related to it. I'm certainly 14 aware that lead also has a lot of health effects 15 related to it. And in the interest of health of 16 our employees and of our customers, we stopped 17 using them. 18 Q. Based on what you saw today, are you able to 19 state whether lead was a part of the Pawtucket 20 facility waste stream, at some point in time, at 21 Teknor Apex? 22 A. Yes. 23 Q. And was cadmium a part of the waste stream at 24 Teknor Apex at the Pawtucket facility, at some 25 point in time?
255 1 MR. BENIK: Objection. 2 A. I didn't say that. 3 Q. Okay. You don't know whether they did or not? 4 A. I said I don't know whether they used lead 5 chromate. You asked me what a possible inorganic 6 pigment was, I gave you one. 7 Q. Are there any records that still exist that would 8 tell me whether lead chromate was one of the 9 sources of the chrome that were in the test 10 results that we saw earlier. 11 A. Test results that I saw earlier were not 12 related to this facility. 13 Q. Okay. They were related to what? 14 A. To the Pawtucket facility. 15 Q. What was the source of the chrome in the 16 Pawtucket facility? 17 A. I would suspect that that came from lead 18 chromate. 19 Q. Okay. Were you aware that the Pawtucket facility 20 used lead chromate? 21 A. Yes, I was. 22 Q. Do they still use lead chromate? 23 A. No, they do not. 24 Q. When did they stop? 25 A. I don't -- I don't know. We haven't used it	257 1 A. Yes. 2 Q. And was some form of chromium, whether it was 3 lead chromate or something else, a part of the 4 waste stream from the Pawtucket facility, at some 5 point in time? 6 A. Yes. 7 Q. Have you seen anywhere on any of the waste 8 surveys that those chemical compounds listed as a 9 part of Teknor Apex's waste stream? 10 A. In the 104(e)'s, no, I have not, as I said 11 earlier, in the context that we tried to answer 12 them, but that's -- that's -- that they were in 13 empty bags, that's how we answered the questions. 14 Q. My last question on the 104(e), go to Page 149. 15 I think we're still talking about Custom Color. 16 A. Yes. 17 Q. Where it says, "types of materials spilled" at 18 the top, "solid spills." 19 A. Yep. 20 Q. And that says, "Material would be vacuumed and/or 21 swept, discarded into the dumpster." Do you see 22 that? 23 A. Correct. I see that. 24 Q. What solids? Do you have any sense of what 25 they're referring to there?

258 1 A. Could be polyethylene, could be any one of the 2 plastics, any one of the things that I've spoken 3 about that we've used there. 4 Q. Do you know what the vacuuming process was? 5 A. It was a vacuum process. They vacuumed it up. 6 Q. So either vacuum or sweep it up? 7 A. That's correct. 8 Q. Throw it into the dumpster? 9 A. That's correct. 10 Q. But you're not able to state when it says "solid 11 spills" with any more specificity than the solid 12 could be any one of the solids used at Custom 13 Color? 14 A. I don't know. That's correct. 15 Q. Let me just walk through just a few questions I 16 have here. Continental Oil, you mentioned them 17 early on this morning? 18 A. Yes, I did. 19 Q. Is Continental Oil an entity that operated at the 20 Pawtucket facility? 21 A. Yes, it did. 22 Q. So they were the owner and operator before -- for 23 lack of a better word, before some version of 24 Teknor took over in the '60's? 25 A. Yes.	260 1 would refer to as a petrochemical. But if you 2 looked at it and you touched it as a layman, you 3 would say, "well, it's an oily substance," so 4 that's why they're using that term. 5 Q. So if I see a reference to plasticizer oil 6 somewhere in these documents -- 7 A. They mean a plasticizer. 8 Q. Which is one of the things that was manufactured? 9 A. Correct. Correct. 10 Q. Was perchloroethylene used in Pawtucket facility? 11 A. Perchloroethylene was never used in the 12 manufacture of anything. I know that we did use 13 it as a parts cleaner where you, you know, you 14 have one of these self-contained parts cleaner 15 things and used it in that form. 16 Q. What was done when it had outlived its use? 17 A. Typically, you leased these part cleaner 18 things and they'd take back the perchloroethylene 19 and I guess they clean it or whatever and 20 probably sell it to the next guy. 21 Q. Okay. Are you familiar with a compound called 22 vinyl chloride monomer? 23 A. Yes, I am. 24 Q. What's that? 25 A. That's the monomer that PVC is formed from.
259 1 Q. Okay. Do you know what the nature of the 2 transaction was, the sale between Continental and 3 Teknor? 4 A. The sale to Continental was a stock 5 transaction. The sale -- the purchase back was 6 an asset transaction. 7 Q. Okay. And that was -- again, occurred when, in 8 the '60's, '68? 9 A. The sale was in 1964 and the purchase back, I 10 believe, was in 1968. 11 Q. Are there still documents that are maintained by 12 the company that show those transactions we just 13 talked about? 14 A. Yes. 15 MR. MURPHY: I'm going to make a request 16 on the record to see those corporate 17 transactional records. 18 THE WITNESS: Okay. 19 MR. MURPHY: And, Greg, consistent with, 20 you know, my production, if any of it's 21 confidential and there's a need for 22 confidentiality agreements, no problem there. 23 Q. What is plasticizer oil? 24 A. Probably a misnomer because plasticizer is 25 technically not an oil. Plasticizer is what I	261 1 Q. Would any of that -- is that the type of material 2 that would end up in your waste stream? 3 A. From a theoretical standpoint, vinyl chloride 4 monomer's in PVC resin at, I don't know, one or 5 two parts per billion or some number like that. 6 I don't know the exact number. So to the extent 7 that any PVC resin went in there, then 8 theoretically that could be there. 9 Q. Would the extruders and other kind of working 10 equipment periodically be cleaned or purged or 11 flushed? 12 A. Yes. 13 Q. How were they flushed? Did it depend on the 14 piece of equipment? 15 A. Depended -- yes, it would depend on the piece 16 of equipment. 17 Q. Would sometimes you use water to flush it? 18 A. That would be not very common. 19 Q. What would you use typically to flush? 20 A. Typically, what you would use to flush is we'd 21 use what we'd refer to as a cleanout batch and we 22 would make a batch of PVC that might have no 23 pigment in it or no other additives in it and run 24 it through. That would, if you will, scour out 25 the -- those items. We would take that in our

262 1 garden hose operation and then start over again. 2 So that would be a typical way of cleaning 3 something. Not the only way, but a way. 4 Q. Was ethylene dichloride used in any of your 5 processes? 6 A. Ethylene dichloride, I don't think so. That's 7 not something that comes to mind at all. 8 Q. Are you familiar with the term phthalic anhydride 9 production? 10 A. Phthalic anhydride, yes. Yeah. 11 Q. Was that a process, a production process? 12 A. Teknor Apex has never made phthalic anhydride. 13 I want to be very specific there. I mean, I'm 14 talking about Teknor Apex. So from '68 until the 15 present, we have not made phthalic anhydride. 16 Q. You mentioned -- I believe you mentioned that 17 there were curatives for the rubber products? 18 A. Yes. 19 Q. What were they? What were the rubber curatives? 20 What were they made of? 21 A. Sulfur. 22 Q. Sulfa? 23 A. Sulfur. 24 Q. Sulfur. Any other curatives? 25 A. We used some cure agents, peroxides, but -- I	264 1 plasticizer was absorbed into that material. 2 Q. So whatever was in the plasticizer would be in 3 there? 4 A. Correct. 5 Q. What would happen when that filter material -- 6 A. We would gather that up, put it, typically, 7 into a fiber drum and then we would transport it 8 to our garden hose facility to get the 9 plasticizer value out of it, so we'd put it into 10 the scrap. And because of it had plasticizer in 11 it, it would give it its flexible edge. 12 Q. Was there ever a period of time when filter cakes 13 were thrown in the dumpster? 14 A. Again, to say that it was never put in the 15 dumpster, I probably could not say that, but that 16 was not our practice, again, because we'd be 17 throwing away money. 18 Q. What's a press cake? 19 A. That's what -- press cake and filter cake, one 20 in the same. 21 Q. Same thing? 22 A. Same thing. 23 Q. Do you know how much press cake was generated on 24 a daily basis? 25 A. Well, I do after reading that thing earlier
263 1 take that back. During the relevant period, we 2 wouldn't have used peroxide as a curative. It 3 would have been I can't say 100 percent sulfur, 4 but that would have been by far the predominant 5 one. 6 Q. Well, based on your experience, if it wasn't 100 7 percent sulfur, what was the other 8 common curative? 9 A. I wouldn't know. I wouldn't know. 10 Q. There was some reference to filter cakes. 11 A. Yes. 12 Q. What are filter cakes? 13 A. Filter cake is made during the production of a 14 plasticizer. It's used to filter the plasticizer 15 at the end of the operation. 16 Q. And so was it a material that the plasticizer ran 17 through? 18 A. That is correct. 19 Q. And was there anything left behind in the 20 filter -- 21 A. Yes. 22 Q. -- material? 23 A. Yes. 24 Q. What? 25 A. Carbon black, diatomaceous earth, and	265 1 today. It said 1,000 pounds on Mr. McKeen's 2 record, I believe. 3 THE WITNESS: Is that correct? 4 MR. MURPHY: I think that's right. 5 A. I think that's right. I think that's what I 6 read earlier. Or was that a month? I don't 7 know. 8 Q. What about in Pawtucket? I think that reference 9 1,000 pounds a day was for Attleboro. 10 A. That's right. 11 Q. What about Pawtucket? 12 A. In Pawtucket, we wouldn't have been generating 13 filter cake. 14 Q. Okay. So at the Attleboro facility filter cake, 15 what did it look like when it was kind of 16 finished with the filtering process? Was it wet? 17 Sticky? Dry? 18 A. It would be -- some would be dry, some would 19 be sticky. No, maybe not sticky. Some would, 20 you know, appear to have a certain amount of, you 21 know, moisture in it, if you will. It would be 22 like mud, you know, kind of thing and it would 23 typically be black. 24 Q. Did it have any smell associated with it? 25 A. It could depending upon what plasticizer we

266 1 might have made. It could have had a smell. 2 Q. Could you characterize the smell? 3 A. I'm not sure I could characterize the smell. 4 I'm not sure I'm good at characterizing smell 5 with words. I mean, it could -- I mean, it 6 smelled. I'm not sure I could put words around 7 that smell, unfortunately. I just can't. I 8 don't know how I'd characterize it in words, to 9 be honest with you. 10 Q. Okay. At the beginning of my questioning, you 11 might recall there was a reference that each 12 department, prior to 1988, had a supervisor who 13 made their own arrangements for waste disposal? 14 A. That's what -- that's what it said, yes. 15 Q. Is that true at Pawtucket and Attleboro? 16 A. I think the reference we were reading was 17 referring to Pawtucket, but I would suspect the 18 same thing happened in Attleboro. 19 Q. In 1980, how many departments were there in 20 Pawtucket that would have been making those 21 independent waste disposals? 22 A. Probably four departments. 23 Q. And what about Attleboro in 1980? 24 A. Two. 25 Q. Two?	268 1 Q. Okay. And if you couldn't stop using it, did 2 they want you to try to using less of it? 3 A. Yeah, stop using it, use less of it. 4 Encourage you to look for alternative materials. 5 Q. Okay. Now, if you go to the third page of 6 Exhibit 8, the bottom paragraph, it starts with 7 "The plasticizer production occurs." Do you see 8 that? 9 A. Yes, sir. 10 Q. About halfway down, there's a statement, "Out of 11 these chemicals in the plasticizer production 12 unit there were four reportable T-U-R-A chemicals 13 in 1981." 14 A. That is correct. 15 Q. Do you know what -- if a chemical was a TURA 16 reportable chemical -- 17 A. Yes. 18 Q. -- what does that mean? 19 What is a reportable chemical under that 20 program? 21 A. I believe what we had to do was those were one 22 of the chemicals that we had to disclose to them 23 how much we were using and what our plans were to 24 try to use less of that chemical or not use that 25 chemical at all. I believe that was the
267 1 A. Three, counting maintenance. 2 Q. Okay. Tell me what were the four Pawtucket 3 departments in 1980? 4 A. Well, first I think I'll, maybe, change that 5 to five because I'm going to add maintenance in. 6 Q. Okay. 7 A. Vinyl, maintenance, rubber, soling, garden 8 hose. However many that just came out to. 9 Q. Okay. And what about at Attleboro? 10 A. Plasticizer, color and maintenance. 11 MR. MURPHY: Just one last area of 12 inquiry. Exhibit 8. 13 (Off the record discussion.) 14 Q. There's a process -- or a program, it looks like, 15 that Mass DEP had called TURAC, T-U-R-A-C, Toxic 16 Use Reduction and Compliance Program. 17 A. Uh-huh. 18 Q. Are you generally familiar with that program? 19 A. Yes, I am. 20 Q. What is that? 21 A. Generally, what the State of Massachusetts 22 wanted you to do if you were using one of these 23 chemicals that were on that list -- and the list 24 does change from time to time -- they wanted you 25 to stop using it.	269 1 substance of the program. 2 Q. And there's a phthalate that starts with di(2) -- 3 A. Yes. 4 Q. -- do you see that? 5 A. Yes. 6 Q. Was that that phthalate you were telling me about 7 that you guys used that was one of the listed 8 chemicals? 9 A. Yes, it is. 10 Q. There's a second plasticizer called 11 bis(2-ethylhexyl)adipate? 12 A. Yes, sir. 13 Q. Was that also a phthalate? 14 A. No. 15 Q. But it was -- was it an SVOC? 16 A. I don't know. 17 Q. Was that a chemical that was used at the plant 18 that was on the list of hazardous materials as 19 far as -- 20 A. It was not used at the plant. It was made at 21 the plant. 22 Q. Oh, okay. And it was listed as one of the 23 hazardous materials by Mass DEP? 24 A. According to this, yes. Yeah. 25 Q. Okay. What about butyl benzyl phthalate?

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3 I, Devin J. Baccari, a Certified Shorthand
4 Reporter and Notary Public within and for the State of
5 Rhode Island, do hereby certify that I am expressly
6 approved as a person qualified and authorized to take
7 depositions pursuant to the Rules of Civil Procedure
8 of this Court, especially, but without restriction
9 thereto, under Rule 30 of said Rules; that the witness
10 was first sworn by me; that the foregoing is a true,
11 accurate, and complete transcript of my notes taken in
12 the above entitled proceedings.

13 I further certify that the exhibits are
14 attached and copies furnished to counsel.

15
16 I further certify that I am not counsel,
17 attorney or relative of either party or clerk or
18 stenographer of either party, or of the attorney of
19 either party, or otherwise interested in the event of
20 this suit.

21
22 I further certify that neither the deponent
23 nor any party requested a review of the transcript.

24
25 IN WITNESS WHEREOF, I hereunto set my hand
26 this 17th day of March, 2010.

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DEVIN J. BACCARI, CSR, NOTARY PUBLIC
My Commission Expires 8/17/10

DATE: MARCH 3, 2010
IN RE: UNILEVER BESTFOODS VS. TEKNOR APEX
WITNESS NAME: WILLIAM MURRAY

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JURAT

I, _____, do
hereby certify that I have read the
foregoing transcript of my testimony,
taken on _____, 2010, and have signed
it subject to the following changes:

PAGE	LINE	CORRECTION	REASON

Sworn and subscribed to before me on this

_____ day of _____, 2010.

NOTARY PUBLIC _____

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNILEVER BESTFOODS and KIK CUSTOM
PRODUCTS, INC., f/k/a CCL CUSTOM
MANUFACTURING, INC.

Plaintiffs,

Civil Action No. 01-496-L

v.

TEKNOR APEX COMPANY, *et al.*

Defendants.

KIK CUSTOM PRODUCTS, INC., f/k/a
CCL CUSTOM MANUFACTURING, INC.

Plaintiff,

Civil Action No. 01-511-L

v.

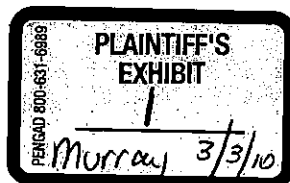
A.T. CROSS COMPANY, *et al.*

Defendants.

**PLAINTIFFS' NOTICE OF DEPOSITION OF DEFENDANT TEKNOR APEX
COMPANY RE: CONTENT OF WASTE AND WASTE DISPOSAL;
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs Unilever Bestfoods and KIK Custom Products, Inc. will take the oral deposition of Defendant Teknor Apex Company before a certified stenographic reporter, commencing at 10:00 a.m. on December 1, 2009 and continuing from day to day at the offices of Adler Pollock & Sheehan P.C., One Citizens Plaza, 8th Floor, Providence, Rhode Island 02903.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), the Defendant Teknor Apex Company shall designate and produce at the deposition those of its officers, directors, managing agents, employees, or agents who are most qualified to testify on its behalf as to those matters set



forth in the notice under the heading "Designated Issues" to the extent of any information known or reasonably available to Defendant Teknor Apex Company.

Plaintiffs request that ten (10) days prior to the depositions, Defendant Teknor Apex Company provide: (1) the names and titles of the persons it will designate to give testimony; and (2) summaries of the areas in which each designated person will give testimony.

DEFINITIONS

1. "DOCUMENT" or "DOCUMENTS" have the same meaning as used in Rule 34(a) of the Federal Rules of Civil Procedure, and shall be construed to include all writings of any kind whatsoever and in any medium, however recorded or reproduced, including originals and non-identical copies, duplicates, drafts, translations, and other preliminary materials that are different in any way from the executed or final document, regardless of whether designated "confidential," "privileged," or otherwise protected, wherever located, as made discoverable under Rule 34 of the Federal Rules of Civil Procedure, including, but not limited to, the following: accounting ledgers; accounts payable records; accounts receivable records; acknowledgments; advertisements; affidavits; agreements; analyses; assignments; balance sheets; bills; booklets; books; books of account; brochures; bulletins; calendars; catalogs; CD-ROMs; charts; checks; circulars; communications received or sent; compilations; computer cards; computer disks; computer files; computer-generated matter; computer tapes; contracts; correspondence; data processing cards; data reports; diaries; digitally-created matter; drafts; drawings; electronic data processing cards; electronic or computer media; e-mails; facsimile transmissions; files; financial and statistical data; financial statements; floppy disks; graphic materials; graphs; information stored or backed-up on a computer disk, computer hard drive,

server hardware, magnetic tape, and/or any other method; instructions; inventory records; invoices; journals; indices; interviews; ledgers; letters (sent or received); licenses; lists; magazines; mailings; mechanical recordings; memo pads; memoranda; microfiche; microfilm; minutes; motion pictures; notebooks; notes (handwritten or otherwise); orders; papers; periodicals; phone messages; photographic negatives; photographs; press releases; printed matter; printouts; publications; purchase orders; questionnaires; receipts; recordings; records; records of interoffice communications; reports; schedules; shipping records; statements; statistical compilations; studies; summaries; surveys; tables; tabulations; tape recordings; telegrams; telexes; transcripts of testimony; videotapes; voice-mails; vouchers; wire recordings; work papers; worksheets; and written records or recordings of any conferences, meetings, visits, interviews, or telephone conversations. Any copy containing thereon, or having attached thereto, any alterations, notes, comments, or other materials shall be deemed a separate document from the original or any other copy not containing such materials. As used herein, "shipping records" is meant to include all shipping and transportation and disposal records of any type or kind, including shipping memos, bills of lading, purchase orders, weigh tickets, disposal tickets, pick-up or delivery tickets, drivers logs, invoices, packing lists, manifests, regulatory filings detailing shipments and handling of hazardous materials, safety transportation cards and any material safety data sheets, and all similar shipping and transportation memoranda relating to the consignment, delivery, or other offering of waste by you to any entity for shipment, transportation, recycling, disposal or other delivery or handling.

2. "DEFENDANT," "YOU" or "YOUR" mean Teknor Apex Company and its officers, directors, employees, partners, corporate partners, subsidiaries, affiliates, agents and representatives, and any person or entity acting on its behalf.

3. "HAZARDOUS SUBSTANCE(S)" is defined pursuant to Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

4. "RELEVANT PERIOD" means the period January 1, 1954 through January 1, 1986.

5. "WASTE" means any garbage, refuse, sludge, or other discarded material including any liquid, semi-liquid, suspended solids, sludge, gaseous, solid or semi-solid material resulting from industrial, manufacturing, agricultural, mining, oil production, packaging, cleaning or other commercial operations or processes, including, but not limited to, household wastes, off-specification product, recycled materials, virgin materials and any "hazardous substance" or "hazardous waste" as those terms are defined under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and the Resource Conservation and Recovery Act, 42 U.S.C. § 6903(5), respectively.

DESIGNATED ISSUES

NOTICE IS FURTHER GIVEN that Defendant Teknor Apex Company will be deposed concerning the following issues:

1. The gathering of DOCUMENTS in preparation for and in response to this Notice and the accompanying Request to Produce Documents, including the efforts made to locate DOCUMENTS, the person who made the efforts, the results of those efforts, authentication of all DOCUMENTS produced, and whether any DOCUMENTS responsive to this Notice were destroyed. If said DOCUMENTS were destroyed, the date of their destruction and the person responsible for their destruction.

2. The content of WASTE, including, but not limited to, liquid, dust or powder, generated by YOU at the following facilities during the RELEVANT PERIOD:

- a. YOUR Pawtucket, Rhode Island facilities;
- b. YOUR Cumberland, Rhode Island facilities; and
- c. YOUR Attleboro, Massachusetts facilities.

3. The content of WASTE, including, but not limited to, liquid, dust or powder, disposed of by YOU from the following facilities during the RELEVANT PERIOD:

- a. YOUR Pawtucket, Rhode Island facilities;
- b. YOUR Cumberland, Rhode Island facilities; and
- c. YOUR Attleboro, Massachusetts facilities.

4. The presence of HAZARDOUS SUBSTANCES in WASTE identified in response to Designated Issues #2 and #3.

5. The identity of the carrier that hauled WASTE from the following facilities during the RELEVANT PERIOD:

- a. YOUR Pawtucket, Rhode Island facilities;
- b. YOUR Cumberland, Rhode Island facilities; and
- c. YOUR Attleboro, Massachusetts facilities.

REQUESTS FOR PRODUCTION OF DOCUMENTS

NOTICE IS FURTHER GIVEN that Defendant Teknor Apex Company and its counsel are required by Federal Rule of Civil Procedure Rule 34 to produce the following:

1. All DOCUMENTS reviewed, considered and/or used by the deponent to determine the facts related to any issues set forth above and/or to prepare for this deposition.

2. Deponent's current resume and/or curriculum vitae.

3. All DOCUMENTS or Material Data Safety Sheets which reflect the content of WASTE generated at or disposed of from the following facilities during the RELEVANT PERIOD:

- a. YOUR Pawtucket, Rhode Island facilities;
- b. YOUR Cumberland, Rhode Island facilities; and
- c. YOUR Attleboro, Massachusetts facilities.

Dated: October __, 2009

Respectfully submitted,
UNILEVER BESTFOODS
By Its Attorneys:

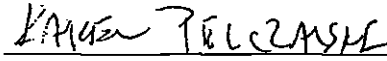


MARK O. DENEHY, ESQ. (#3492)
KRISTEN W. SHERMAN, ESQ. (#5595)
ADLER POLLOCK & SHEEHAN P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-2443
Tel: (401) 274-7200
Fax: (401) 751-0604/351-4607

THOMAS C. JACKSON, ESQ.
BAKER BOTTS L.L.P.
The Warner
1299 Pennsylvania Avenue, NW
Washington, D.C. 20004-2400
Tel: (202) 639-7710
Fax: (202) 585-1009

KIK CUSTOM PRODUCTS, INC.

By Its Attorneys:



KAREN A. PELCZARSKI, ESQ. (#3357)

BLISH & CAVANAGH

30 Exchange Terrace

Providence, RI 02903

(401) 831-8900

Fax: (401) 751-7542

Of Counsel:

JONATHAN A. MURPHY, ESQ. (JAM-6052)

LESTER, SCHWAB, KATZ & DWYER,
LLP

120 Broadway

New York, New York 10271-0071

(212) 964-6611

Fax: (212) 267-5916

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of October, 2009, I caused a copy of the within to be sent by e-mail to the following counsel of record:

- Julie P. Barry
jpbarry@nutter.com
- Stephen J. Brake
sbrake@nutter.com
- Thomas C. Jackson
thomas.jackson@bakerbotts.com
- Mortimer C. Newton
mortnewton@gmail.com
- Jonathan A. Murphy
jmurphy@lskdnylaw.com
- Deming E. Sherman
dshearn@eapdlaw.com
- Francis J. Sally
fjs@sally-fitch.com
- Andrea Peraner-Sweet
aps@sally-fitch.com
- Alexandra M. Callam
acallam@haslaw.com
- Elton L. Parker
Elton.Parker@ipaper.com
- Matthew F. Medeiros
mfm@lmkbw.com
- John Voorhees
voorhees@pattonboggs.com
- William D. Gillis
wgillis@donovanhatem.com
- Justin T. Shay
jshay@cm-law.com
- Gregory L. Benik
gbenik@jreri.com
- Kevin J. Bristow
KJBristowlaw@verizon.net
- Keven A. McKenna
KevenM@McKennaLaw.cc
- Karen Ann Pelczarski
kap@blishcavlaw.com
- Thomas C. Plunkett
tplunkett@kprlaw.com
- Dean S. Sommer
dsommer@youngsommer.com
- Irvin M. Freilich
ifreilich@rfbclaw.com
- Gerald J. Petros
gpetros@haslaw.com
- Mary C. Dunn
mcd@blishcavlaw.com
- Steven M. Richard
srichard@nixonpeabody.com
- Tina M. Fogell
tfogell@donovanhatem.com
- Kevin J. McAllister
kmcallister@brasm.com
- Brian C. Newberry
bnewberry@donovanhatem.com
- Scott F. Bielecki
sbielecki@cm-law.com

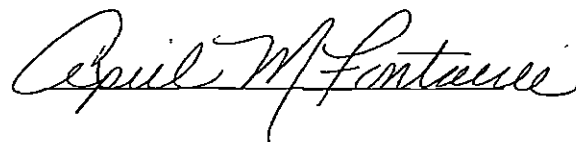
and by mail to the following counsel of record:

Tristan W. Gillespie
Robertson Freilich Bruno & Cohen, LLC
The Legal Center
One Riverfront Plaza, 9th Floor
Newark, NJ 07102-5468

Stephen W. Earp
Smith Moore Leatherwood LLP
P.O. Box 21927
Greensboro, NC 27420

Bradley M. Risinger
Smith Moore Leatherwood LLP
PO Box 27525
Raleigh, NC 27611

Benjamin G. Stonelake, Jr.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103





100 MAIN STREET PAWTUCKET, RHODE ISLAND 02860

401 723.6108

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31774

Via U.S. Certified Mail

March 8, 2002

David J. Newton
Remedial Project Manager
U.S. Environmental Protection Agency
P.O. Box 6329
Boston, MA 02114-6329

Re: Request for Information Pursuant to Section 104 of CERCLA for Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site in Cumberland, Rhode Island.

Dear Mr. Newton,

Enclosed please find Apex, Inc.'s response to the U.S. Environmental Protection Agency's request for information relating to the Peterson/Puritan, Inc. Superfund Site, located in Cumberland, Rhode Island.

If I can be of further assistance, please feel free to give me a call at (401) 723-6108, ext. 1006.

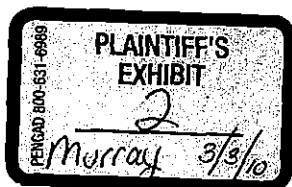
Sincerely,

Elizabeth Pella
Assistant to the President

Enclosure

0037-0074

TA00746



RESPONSE TO EPA INFORMATION REQUEST

1. General Information About Respondent:

- a) Apex, Inc.
100 Main Street
Pawtucket, Rhode Island 02860
- b) Elizabeth Pella
Assistant to the President
100 Main Street
Pawtucket, Rhode Island 02860
ph: 401-729-7206, fax: 401-729-7215, email: elizabeth.pella@apexstores.com
- c) Attorney Alexandra Callam
Hinckley, Allen & Snyder, LLP
1500 Fleet Center
Providence, Rhode Island 02903
ph: 401-274-2000, fax: 401-277-9600, email: acallam@haslaw.com
- d) 495 Central Avenue, Pawtucket, RI
100 Main Street, Pawtucket, RI 02860
1 School Street, Pawtucket, RI 02860
- e) 495 Central Avenue-1955-1971
100 Main Street- 1971-2001
1 School Street- 1971-2001
- f) 495 Central Avenue-no longer operating
100 Main Street- operates as a retail store, selling goods for the home. These include products for the bed, bath and kitchen.
1 School Street- operates as a retail automotive tire and service center.
- g) Apex, Inc.'s SIC code is 3731.
- h) 495 Central Avenue-operated as a small retail department store. Products sold included sporting goods, tires, small appliances and other items for kitchen and dining.
100 Main Street- operated as a retail department store. Products sold included clothing for the family, jewelry, small appliances, furniture, as well as items for the bed, bath, kitchen and garden.
1 School Street- operated as a retail automotive tire and service center.
- i) 495 Central Avenue-not applicable
100 Main Street- not applicable

0037-0075

TA00747

1 School Street- Battery Dealer Deposit and Return Report has been submitted to the State of Rhode Island Department of Environmental Management, Office of Environmental Coordination.

2. Respondent's Legal and Financial Status:

a) 39 employees

b) 1954-1959- These records are no longer available.

1960-1965- "

1966-1971- "

1972-1977- "

1978-1983- "

1984-1986- "

c) Not applicable.

d) Apex objects to this request because it is irrelevant, overly broad, premature, and beyond the scope of the United States' authority to request material pursuant to Section 104(e) of CERCLA .

e) Apex objects to this request because it is irrelevant, overly broad, premature, and beyond the scope of the United States' authority to request material pursuant to Section 104(e) of CERCLA .

f) i) July 1, 1955

ii) Rhode Island

iii) John J. Pendergast, Esq.

iv) Andrew Gates, President; Jonathan Fain, Vice President, Treasurer; Lyle Fain, Vice President, Secretary; Norman Fain, Assistant Secretary, CEO, Chairman; Larry Wesson, Assistant Secretary, CFO, Vice President; Michael D'Vorin, Vice President; Sheila O'Connell, Vice President

v) Jonathan Fain, Lyle Fain, Norman Fain

vi) Norman Fain

vii) Albert Pilavin, M. Edgar Fain, Norman M. Fain, Alfred A. Fain, Irving Jay Fain, Sherwood Kahn, William L. Mayer, Marvin Baker, Lyle S. Fain, Marvin Grabel, Alexander Flint, Jonathan D. Fain, Norman Axelrod

viii) Albert A. Fain, Albert Pilavin, M. Edgar Fain, Irving Jay Fain, Norman M. Fain, William Mayer, Daniel Jacobs, Jonathan D. Fain, Lyle S. Fain

ix) Apex objects to this request because it would be overly burdensome and costly to attain this information.

g) Not Applicable

h) Not Applicable

0037-0076

TA00748

i) Not Applicable

j) Not Applicable

k) Not Applicable

l) Not Applicable

m) Not Applicable

3. Information About Others:

a) Not Applicable

b) Not Applicable

c) Not Applicable

4. Compliance With This Request:

- a) i)-iv) Andrew Gates, Current President
Larry Wesson, Current Assistant Secretary, CFO, Vice President
Debbi Stein, Current Finance Manager
Roseanne James, Current Human Resources Manager
David Morgan, Current Tire & Service Center General Manager
Karin Chieffallo, Current Office Receptionist & Secretary

v)-viii) Documents from our Finance Department, Human Resources Department and Tire and Service Center Records Division were reviewed. These documents were, and are currently located in their respective offices of our corporate office.

5. Respondent's Operations:

(Please note that the following information covers the time period from approximately 1992 through 2001.)

- a) 495 Central Avenue, Pawtucket, Rhode Island
100 Main Street, Pawtucket, Rhode Island 02860
1 School Street, Pawtucket, Rhode Island 02860

- b) i) 495 Central Avenue- 1955-1971
100 Main Street- 1971-2001
1 School Street-1971-2001

ii) 495 Central Avenue-operated as a small retail department store. Products sold included sporting goods, tires, small appliances and other items for kitchen and dining.

0037-0077

TA00749

100 Main Street-operated as a retail department store. Products sold included clothing for the family, jewelry, electronics, major appliances, small appliances, furniture, as well as items for the bed, bath, kitchen and garden.

1 School Street- operated as a retail automotive tire and service center.

c) In 2001, the department store was downsized to sell only goods for the home. These include products for the bed, bath and kitchen.

d) Apex, Inc. is not a manufacturer of goods.

e) Oil, antifreeze, parts cleaning solution, brake cleaner solvent (no longer used as of approximately 2000), car batteries, car tires.

f) See attached.

g) Simple Green cleaner is used to clean the tire changing machine, the high speed balancer and oil drain buckets. Approximately 1/2 gallon is used monthly. Rags are also provided to us by Unifirst Uniform Company for use in cleaning the oil drain buckets. These rags are picked up by them on a monthly basis.

h) Rags are used to clean any spills. These rags are provided by Unifirst Uniform Company, and are picked up by them on a monthly basis.

6. Respondent's Wastes and Waste Streams:

(Please note that the following information covers the time period from approximately 1992 through 2001.)

a) See attached.

b) Motor oil-thick liquid, light brown in color, slight odor, approximately 250 gallons about every 6 weeks, 2001

Oil filters-various colors, no odor, approximately 55 gallons about every 4 weeks, 2001

Antifreeze-liquid, green in color, slight odor, approximately 55 gallons about every 8 weeks, 2001

Parts cleaning solution-liquid, light brown in color, slight odor, approximately 11 gallons about every 16 weeks, 2001

Brake cleaner solvent-liquid, clear in color, slight odor, approximately 7 gallons, twice yearly, 2000

Car batteries-various colors, no odor, approximately 20 per month, 2001

Car tires-black, no odor, approximately 200 per month, 2001

c) The above waste is all generated by our Tire and Service Center located at 1 School Street, Pawtucket, Rhode Island 02860

d) Dave Morgan, Tire and Service Center General Manager

0037-0078

TA00750

Rick Sisson, Tire and Service Center Parts Manager

- e) Motor oil-stored in a 250 gallon metal oil tank, inside garage area
- Oil filters-stored in a 55 gallon metal drum, inside garage area
- Antifreeze- stored in a 55 gallon plastic drum inside garage area
- Parts cleaning solution-stored in a 15 gallon metal drum attached to a parts cleaning tray, inside garage area
- Brake cleaner solvent-stored in a 5 gallon plastic sealed parts washing assembly inside garage area (no longer used as of approximately 2000)
- Car batteries-stored on a pallet, inside garage area
- Car tires-stored alongside the building, outside of the garage

7. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

(Please note that the following information covers the time period from approximately 1992 through 2001.)

- a) Dave Morgan, Tire and Service Center General Manager
Rick Sisson, Tire and Service Center Parts Manager
- b) Same as above.
- c) Larry Wesson, Assistant Secretary, CFO, Vice President
- d) Dave Morgan, Tire and Service Center General Manager, 1976-2001
Rick Sisson, Tire and Service Center Parts Manager, 1976-present
Larry Wesson, Assistant Secretary, CFO, Vice President, 1993-2001
- e) Motor oil-stored in a 250 gallon grey above ground metal oil tank, no distinctive markings.
 - Oil filters-stored in a DOT approved 55 gallon black metal drum marked "used oil filters", with a phone number for pickup on its label.
 - Antifreeze-stored in a DOT approved 55 gallon black plastic drum, marked "NES Remanufactured Antifreeze/Coolant Ethylene Glycol Based." It is also marked with a warning label, first aid and spill or leak instructions.
 - Parts cleaning solution-stored in a 15 gallon green metal drum, marked "Safety Kleen Premium Solvent", with first aid and environmental instructions on label.
 - Brake cleaner solvent-stored in a blue 5 gallon plastic sealed parts washing assembly, marked with first aid and environmental instructions on the label (no longer used as of approximately 2000)
 - Car batteries-stored on a pallet, no distinctive markings, removed by a large white box truck
 - Car tires-removed by a large white box truck

0037-0079

TA00751

For the above, to the best of our knowledge, the containers used were all in used condition when we received them. We do not know the prior use of these containers, as they have been provided by the companies which remove each waste from our facility.

f) The following companies remove waste from our facility on an on call basis:

Safety Kleen Systems, Inc., Bridgewater, MA
North East Environmental Services, Inc., Smithfield, RI
Advanced Liquid Recycling, Meridan, CT
Exide Batteries, Norwood, MA
Bob's Tires, Mattapoisett, MA

g) We no longer have the documents or invoices for the period being investigated.

h) Waste is removed by the companies listed in response 7-f) above. We receive manifests from Safety Kleen listing their site address as 128 Elm Street, Bridgewater, MA. We do not have any documents from the other companies pertaining to where the waste is taken.

i) Safety Kleen Systems, Inc., Bridgewater, MA
North East Environmental Services, Inc., Smithfield, RI
Advanced Liquid Recycling, Meridan, CT
Exide Batteries, Norwood, MA
Bob's Tires, Mattapoisett, MA
Mobil Lubrication Service, Inc., Middleboro, MA
Western Oil, Inc., Pawtucket, RI

j) Not Applicable.

k) Parts cleaner solution & brake cleaner solvent (brake cleaner solvent no longer used as of approximately 2000)-Safety Kleen Systems, Inc., Bridgewater, MA

Oil filters & antifreeze-North East Environmental Services, Inc., Smithfield, RI

Oil filters-Mobil Lubrication Service, Inc., Middleboro, MA
Motor oil-Advanced Liquid Recycling, Meridan, CT
Motor oil-Western Oil, Inc., Pawtucket, RI
Car batteries-Exide Batteries, Norwood, MA
Car tires-Bob's Tires, Mattapoisett, MA

l) Parts cleaner solution-currently approximately 11 gallons about every 6 weeks
Brake cleaner solvent-currently approximately 7 gallons about twice a year-2000
Oil filters-currently approximately 55 gallons about every 4 weeks
Oil filters-Mobil Lubrication Service, from approximately 1993-1998, approximately 55 gallons about every 4 weeks
Antifreeze-currently approximately 55 gallons about every 8 weeks
Motor oil-currently approximately 250 gallons about every 6 weeks

0037-0080

TA00752

Motor oil-Western Oil, Inc., from approximately 1990-1999, approximately 200 gallons about every 4 weeks

Car batteries- currently approximately 20 per month

Car tires-currently approximately 50 per week

m) Parts cleaner solution-currently approximately 11 gallons about every 6 weeks

Brake cleaner solvent-approximately 7 gallons about twice a year-2000

Oil filters-currently approximately 55 gallons about every 4 weeks

Oil filters-Mobil Lubrication Service, from approximately 1993-1998, approximately 55 gallons about every 4 weeks

Antifreeze-currently approximately 55 gallons about every 8 weeks

Motor oil-currently approximately 250 gallons about every 6 weeks

Motor oil-Western Oil, Inc., from approximately 1990-1999, approximately 200 gallons about every 4 weeks

Car batteries- currently approximately 20 per month

Car tires-currently approximately 50 per week

n) Safety Kleen Systems, Inc.-for approximately 10 years.

North East Environmental Services-for approximately 8 years.

Advanced Liquid Recycling-for approximately 10 years.

Exide Batteries-for approximately 10 years.

Bob's Tires-for approximately 10 years.

Mobil Lubrication Service, Inc.-from approximately 1993-1998.

Western Oil, Inc.-from approximately 1990-1999.

o) We do not have any documents for the period being investigated.

p) Safety Kleen Systems, Inc.-a yellow box truck with the company logo is used to haul away parts cleaning solution (when brake cleaner solvent was used by Apex, it was also picked up by Safety Kleen).

North East Environmental Services, Inc.-a black box truck with the company logo is used to haul away oil filters and antifreeze.

Advanced Liquid Recycling-a black tank truck with the company logo is used to haul away motor oil.

Exide Batteries-a large white box truck with the company logo is used to haul away car batteries.

Bob's Tires-a large white box truck with the company logo is used to haul away tires.

q) Not known.

r) We do not have any documents or information for the period being investigated.

t) For each type of waste, our waste carriers are on a will call basis. The general manager of the Service Center calls each waste carrier as it becomes necessary to remove

0037-0081

TA00753

the waste. Deb Stein, our finance manager is responsible for paying the invoices. Payments are sent directly to each carrier.

u) Each waste carrier selects the location where the wastes are taken.

v) We receive manifests from Safety Kleen listing their site address as 128 Elm Street, Bridgewater, MA. We do not have any documents from the other companies pertaining to where the waste is taken.

w) Wastes are not disposed into drains.

x) Not Applicable.

y) Not Applicable.

z) Apex has no information that any of its waste was ever taken to the Site.

8. Respondent's Environmental Reporting:

a) RID987478419

b) Apex believes it previously responded to a similar EPA request pertaining to a site in New Hampshire.

c) 1998

d) State of Rhode Island Department of Environmental Management

e) 1996

f) None.

g) None.

9. Site Operations:

a)-k) Apex has no information that any of its waste was ever taken to the Site.

10. Storage, Consolidation or Transfer:

a)-g) Apex has no information that any of its waste was ever taken to the Site.

0037-0082

TA00754

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

Apex, Inc. and that the foregoing is complete, true, and correct.
Respondent

Executed on _____, 20__

Apex Inc.

by: Andrew A. Givens
Signature

Andrew A. Givens
Type Name

its President
Title [if any]

Please complete and return this form with your responses to the Information Request

0037-0083

TA00755

Information Request Waste Survey Chart

Name of Respondent: Apex, Inc.Respondent's Location: School St.
Providence, RIDate: 2/20/02

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location.
Acids				
Adhesives				
Asbestos (incl. Insulation and transite piping)				
Adsorbents (from spills, leaks, etc.)				
Automotive Related Wastes:				
Antifreeze	liquid/55 gallon drums	TRANSPORTED BY ENVIRONMENTAL SERVICES INC.	—	TRANSPORTED BY ENVIRONMENTAL SERVICES INC. STORED IN A 55 GAL. BLACK DRUM
Batteries	BATTERIES ARE STORED ON A PALLET INSIDE BUILDING.	TRANSPORTED BY ENVIRONMENTAL SERVICES INC.	—	APPROX. 20 BATTERIES PER MONTH ARE PICKED UP BY RITE TRUCK. THEY ARE SHRINK WRAPPED ON PALLET.
Brake Fluids				
Degreasers (AAAT'S CLEANER)	AAAT'S DEGREASER IS STORED IN 55 GALLON DRUMS INSIDE BUILDING.	TRANSPORTED BY SAFETY-KLEEN SYSTEMS INC.	—	APPROX. 1 GALLON OF AAAT'S DEGREASER IS PICKED UP EVERY 4 WEEKS BY SAFETY-KLEEN SYSTEMS.
Lubricants				
Oils	WASTE OIL IS PICKED UP FROM 55 GALLON DRUMS TO A TRUCK IN TRENCH.	ADVANCED LIQUID RECYCLING INC. TRANSPORTER	—	APPROX. 250 GALLONS OF WASTE OIL PER MONTH IS PICKED UP BY ADVANCED LIQUID RECYCLING TRUCK.

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Oil Filters	OIL FILTERS ARE STORED IN 4 55 GAL DRUMS INSIDE BUILDING	TRANSPORTED BY ENVIRONMENTAL SERVICES INC.	---	APPROX. 1 55 GAL DRUM OF USED OIL FILTERS ARE FILLED UP BY ENVIRONMENTAL SERVICES INC. PER MONTH
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				
Etching Solutions				
Filters				

TA00757

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location.
Flammable, Reactive, or Explosive Materials				
Fungicides				
Herbicides				
Insecticides				
Insulating/Fire Proofing Materials				
Laboratory Wastes				
Lubricants				
Metals:				
grindings				
powders				
shavings				
sludges				
solutions				
other: (e.g. tanks)				
Paint and Coating Wastes:				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/dumped in trenches @ "x" location..
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				
Photography Wastes:				
developers				
fixers				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acetic Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "s" location on site/dispused in trenches for "s" location..
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes				
Sludges				
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				

TA00761

[illegible]

0037-0089

TA00762

[illegible]

0037-0090

INFORMATION REQUEST QUESTIONS

General Information Section

1. General Information About Respondent:

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. Provide the full legal name and mailing address of the Respondent.
- b. For each person answering these questions on behalf of Respondent, provide:
 - i. full name:
 - ii. title:
 - iii. business address: and
 - iv. business telephone number, FAX machine number and e-mail address.
- c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, mailing address, telephone number, FAX number, and e-mail address.
- d. State every address in Rhode Island, or within 60 miles of the Site at which the Respondent conducted business during the period being investigated.¹
- e. State the dates during which it conducted business at each such location.
- f. Describe the nature of Respondent's current business at each such location, including but not limited to a brief description of the major products or services Respondent manufactures or provides.
- g. List the Standard Industrial Classification (SIC) code for the business at each location.
- h. Describe the nature of the Respondent's business at each location during the period being investigated.
- i. For each location, identify all surveys, studies, or collections of data for which Respondent has submitted information to local, state, federal, or private entities about its waste disposal/recycling practices.

¹ If the Respondent has conducted business at more than three locations in this area, please contact the EPA representative listed in the cover letter to determine the appropriate scope of your response.

2. Respondent's Legal and Financial Status:

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. State the number of Respondent's current employees.
- b. State the annual average number of persons employed by Respondent for every five year period during the period being investigated.
- c. If the Respondent has ever done business under any other name:
 - i. list each such name: and
 - ii. list the dates during which such name was used by Respondent.
- d. Provide the following financial information for Respondent's current business for each of the last three years:
 - i. total sales:
 - ii. net income:
 - iii. depreciation:
 - iv. total assets:
 - v. total liabilities: and
 - vi. net working capital (or net current assets).
- e. As an individual, provide for each of the last five years:
 - i. the gross annual income reported to the U.S. Internal Revenue Service; and
 - ii. the taxable annual income reported to the U.S. Internal Revenue Service.
- f. If Respondent conducts current business as a corporation, provide:
 - i. the date of incorporation:
 - ii. state of incorporation;
 - iii. agent for service of process:
 - iv. the names of current officers:
 - v. the name of current directors:
 - vi. the names of current shareholders owning more than 5% of Respondent's stock:
 - vii. the names of all officers during the period being investigated:
 - viii. the names of all directors during the period being investigated: and
 - ix. the names of all shareholders owning more than 5% of the Respondent's stock at any time during the period being investigated.

g. If Respondent conducts current business as a partnership, provide:

- i. the names and addresses of all current partners;
- ii. the names of all partners in the period being investigated; and
- iii. the type of partnership (e.g., general, limited).

h. If Respondent conducts current business as a trust, provide:

- i. the names and addresses of all current trustees;
- ii. the names and addresses of all current beneficiaries;
- iii. the names of all trustees during the period being investigated;
- iv. the names of all beneficiaries during the period being investigated; and
- v. a copy of the document which sets out the purpose of the trust and the duties and powers of the trustees (i.e., the declaration of trust or trust agreement).

i. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:

- i. a general statement of the nature of relationship;
- ii. the dates such relationship existed;
- iii. the percentage of ownership of Respondent that is held by such other entity; and
- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.

j. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

k. If Respondent no longer exists as a legal entity because of dissolution provide:

- i. a brief description of the nature and reason for dissolution;
- ii. the date of dissolution;
- iii. documents memorializing or indicating the dissolution of the entity; and
- iv. a statement of how and to whom the entity's assets were distributed.

l. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

- i. the titles and dates of the documents that embody the terms of such transactions (e.g., purchase agreements, merger and dissolution agreements, etc.);

- ii. the identities of the seller, buyer, and any other parties to such transactions; and
- iii. a brief statement describing the nature of the asset purchases or mergers.

m. If Respondent has filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;
- ii. the docket numbers of such petition;
- iii. the date the bankruptcy petition was filed;
- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
- v. a brief description of the current status of the petition.

3. Information About Others:

- a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site that is not included in the information you have already provided, provide all such information.
- b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
- c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

4. Compliance with This Request:

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:
 - i. the names of all individuals consulted;
 - ii. the current job title and job description of each individual consulted;
 - iii. the job title and job description during the period being investigated of each individual consulted;
 - iv. whether each individual consulted is a current or past employee of Respondent;
 - v. the names of all divisions of Respondent for which records were reviewed;
 - vi. the nature of all documents reviewed;
 - vii. the locations where those documents reviewed were kept prior to review; and
 - viii. the location where those documents reviewed are currently kept.

Generator Section

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

5. Respondent's Operations:

a. Provide the complete addresses of Respondent's plants and other buildings or structures where Respondent carried out its operations, excluding those locations where only clerical/office work was performed in Rhode Island and/or Massachusetts. Unless otherwise indicated, all following questions refer to these operations.²

b. Provide a brief description of the nature of Respondent's operations at each location including:

- i. the date such operations commenced and concluded; and
- ii. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

c. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

d. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed in these operations.

e. In general terms, list the types of raw materials used in Respondent's operations.

f. Provide copies of Material Safety Data Sheets ("MSDS") for materials used in the Respondent's operations.

g. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- i. the types of materials used to clean/maintain this equipment/machinery; and
- ii. the monthly or annual quantity of each such material used.

² If the Respondent has more than three separate places of business in this area, please contact the EPA representative listed in the text of the cover letter to determine the appropriate scope of your response.

h. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation, including but not limited to:

- i. the types of materials spilled in Respondent's operations;
- ii. the materials used to clean up those spills;
- iii. the methods used to clean up those spills; and
- iv. disposal of any materials used to clean up those spills.

i. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations.

6. Respondent's Wastes and Waste Streams (including By-Products):

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

a. Complete the enclosed "Waste Survey" (Enclosure C), checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- i. its physical state;
- ii. its nature and chemical composition;
- iii. its color;
- iv. its odor;
- v. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- vi. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

c. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

d. Identify (see Definitions) the person(s) responsible for collecting and managing each type of waste.

e. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container in which each type of waste was placed/stored; and
- ii. where each type of waste was collected/stored.

7. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

ALSO NOTE: Your response to questions in this section must refer to all locations, including but not limited to the Site, to which Respondent sent its wastes.

a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes.

b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal/treatment/storage/recycling/sale of Respondent's wastes.

c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

d. For the previous three responses, also provide each individual's:

- i. job title;
- ii. duties;
- iii. dates performing those duties;
- iv. supervisors for those duties;
- v. current position or, if such individual is no longer employed by Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:

- i. the type of container (e.g., 55 gal. drum, dumpster, etc.);
- ii. the colors of the containers;
- iii. any distinctive stripes or other markings on those containers;
- iv. any labels or writing on those containers (including the content of those labels);
- v. whether those containers were new or used; and
- vi. if those containers were used, a description of the prior use of the containers.

- f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.
- g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.
- h. State where Respondent sent each type of its waste for disposal, treatment, or recycling.
- i. Identify (see Definitions) all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).
- j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.
- k. For each type of waste specify which Waste Carrier picked it up.
- l. For each type of waste, state how frequently each Waste Carrier picked up such waste.
- m. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).
- n. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.
- o. Provide copies of all documents containing information responsive to the previous seven questions.
- p. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to:
- i. the type of vehicle (e.g., flatbed truck, tanker truck, containerized dumpster truck, etc.);
 - ii. names or markings on the vehicles; and
 - iii. the color of such vehicles.
- q. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes.
- r. Indicate the ultimate disposal/recycling/treatment location for each type of waste.

s. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

t. Describe how Respondent managed pickups of each waste, including but not limited to:

- i. the method for inventorying each type of waste;
- ii. the method for requesting each type of waste to be picked up;
- iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
- iv. the amount paid or the rate paid for the pickup of each type of waste;
- v. the identity of (see Definitions) Respondent's employee who paid the bills; and
- vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.

u. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

v. State the basis for and provide any documents supporting the answer to the previous question.

w. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:

- i. the nature and chemical composition of each type of waste;
- ii. the dates on which those wastes were disposed;
- iii. the approximate quantity of those wastes disposed by month and year;
- iv. the location to which these wastes drained (e.g., on-site septic system, on-site storage tank, pretreatment plant, Publicly Owned Treatment Works ("POTW"), etc.); and
- v. whether and what pretreatment was provided.

x. Identify any sewage authority or treatment works to which Respondent's waste was sent.

y. For all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations, complete the enclosed Waste Survey (Enclosure C) and respond to all previous questions of this Information Request with reference to such wastes.

z. If not already provided, specify the dates and circumstances when Respondent's waste was taken to the Site, and identify the companies or individuals who brought

Respondent's waste to the Site. Provide all documents which support or memorialize your response.

8. Respondent's Environmental Reporting:

NOTE: All questions in this section refer to the period being investigated and the last ten years unless otherwise indicated.

- a. Provide all Resource Conservation and Recovery Act ("RCRA") Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.
- b. Identify (see Definitions) all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.
- c. State the years during which such information was sent/filed.
- d. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.
- e. State the years during which such information was sent/filed.
- f. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq., ("TSCA"); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. §§ 1101 et seq., ("EPCRA"); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. §§ 1251 et seq.
- g. Identify (see Definitions) the federal and state offices to which such information was sent.

9. Site Operations:

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

- a. Describe what was done to each type of material after it was taken to the Site.
- b. Describe where each type of material brought to the Site was disposed or otherwise placed.
- c. If particular types of materials, were placed or disposed in separate or specific areas of the Site indicate:
 - i. the types of materials so placed or disposed;

- ii. where on the Site those materials were placed or disposed; and
- iii. how those materials were placed or disposed (e.g., Site operator crushed full pails with bulldozer or Respondent emptied full 55 gallon metal barrels into a pit and Site operator then crushed and buried the barrels.)

d. If particular materials were placed or disposed in separate or specific areas of the Site, indicate:

- i. the identity of (see Definitions) each such location to which this material originated;
- ii. the nature and chemical composition of each type of material so placed or disposed;
- iii. the quantity of each material so placed or disposed; and
- iv. where on the Site each such customer's material was so placed or disposed.

e. If drums were placed or disposed at the Site, indicate:

- i. where they were placed or disposed; and
- ii. their condition when placed or disposed (e.g., if they were left open or closed, intact or punctured, whole or crushed).

f. If liquids were placed or disposed at the Site, indicate whether and how liquids were:

- i. mixed at the Site;
- ii. placed or disposed in a separate areas; and
- iii. placed or disposed in their containers or removed from their containers.

g. Describe all procedures undertaken by Respondent and the Site operator upon Respondent's arrival/entry on to the Site, including but not limited to:

- i. the completion of any documentation of disposal/placement at the Site;
- ii. any exchange of cash or checks; and
- iii. any review of permits or other authorities to dispose/place materials at the Site.

h. Describe Respondent's procedures for paying for the disposal/placement of materials at the Site, including but not limited to:

- i. method of payment (e.g., cash, check, money order);
- ii. the frequency of which those payments were made;
- iii. to whom those payments were made;
- iv. the total amount of those payments and the rates paid;
- v. where those payments were made (e.g., at the Site, sent in mail, etc.); and
- vi. providing the identity of the Respondent's employee/agent in charge of accounting for and making such payments.

- i. Identify (see Definitions) other individuals and entities that Respondent has reason to believe may have taken or sent materials to the Site.
- j. Of those individuals and entities identified in the response to the preceding question, specify which individuals or entities Respondent observed at the Site, and indicate when those observations were made.
- k. Provide all information known by Respondent regarding the customers of the entities or individuals identified in the preceding two questions (i.e., the companies or individuals whose material was taken to the Site).

10. Storage, Consolidation or Transfer:

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

- a. If Respondent did not bring all materials directly to the Site (i.e., materials were stored, treated, consolidated, transferred or held at other locations prior to final disposal/placement at the Site), provide:
 - i. the name and address of the other locations;
 - ii. a description of the nature of operations at such other locations;
 - iii. the identity of (see Definitions) the individuals and entities who operated such other or locations;
 - iv. a description of the kinds of materials taken to those locations;
 - v. a description of the quantities of materials taken to those locations;
 - vi. a description of the process(es) the materials underwent at each such location (e.g., storage, consolidation, treatment, etc.); and
 - vii. a description of how long wastes remained at each such location before being taken to the Site.

11. With specific reference to Enclosure C of this letter, please provide the following:

- a. Any and all information concerning the Waste Types identified on Enclosure C including, but not limited to, total volume(s) disposed, the duration of time during which each Waste Type was disposed at the Site, physical state(s)/characteristic(s), method(s) of containing, shipping and disposing, leachability, corrosivity, and toxicity of each Waste Type so identified.
- b. Copies of all documents the Respondent has in its possession and which the Respondent referred to in response to question 11, concerning Enclosure C.

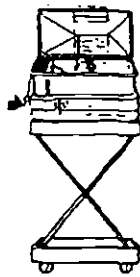
c. Identify (see Definitions) any/all individuals and entities that Respondent has reason to believe may have arranged for, shipped, taken or sent these specific Waste Types to the Site for disposal.

d. For each waste type or source category as indicated in Enclosure C, identify the specific manufacturing or waste stream from which these materials were derived.

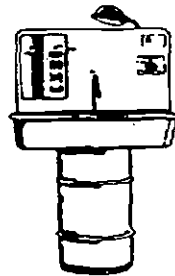
e. Provide copies of all tests, analyses, and analytical results, shipping invoices, manifests or other tracking report(s) concerning each material Respondent generated for disposal at the Site as indicated by Enclosure C.

f. If you do not have documents responsive to the previous question but believe others do (e.g. transporters), identify who might have such documents and the basis for such a belief.

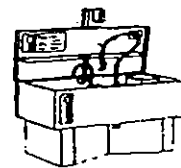
g. List all facility(s) and or location(s) for which these Waste Types were generated and so disposed of at the Site. (Note: If such facility(s) are no longer under your ownership, operation, or control, then identify the current owner/operator of each such facility(s).



Model 14 & 60



Model 16 & 30



*Model 34 & 44, COMS, and
other*

Material Safety Data Sheet
Safety-Kleen 105 Solvent
Part Number 6617

SAFETY-KLEEN 105 SOLVENT

MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

SECTION 1 -- PRODUCT AND PREPARATION INFORMATION

PRODUCT INFORMATION

IDENTITY (TRADE NAME): SAFETY-KLEEN 105 SOLVENT

SYNONYMS: Mineral Spirits. Stoddard Solvent. Petroleum distillates. Petroleum naphtha

SK PART NUMBER(S): 6617

FAMILY/CHEMICAL NAME: Aliphatic hydrocarbon

PRODUCT USE: Cleaning and degreasing metal parts.
If this product is used in combination with other chemicals, refer to the Material Safety Data Sheets for those chemicals.

24-HOUR EMERGENCY TELEPHONE

These numbers are for emergency use only. If you desire non-emergency information about this product, please call a telephone number listed below.

MEDICAL:

1-800-752-7869 (U.S.A.)
1-312-942-5969 (CANADA)

RUSH POISON CONTROL CENTER
CHICAGO, ILLINOIS, U.S.A.

TRANSPORTATION:

1-708-888-4660 (U.S.A.)
SAFETY-KLEEN ENVIRONMENT,
HEALTH AND SAFETY DEPARTMENT

1-613-996-6666 (CANADA)
CANUTEC

MANUFACTURER/SUPPLIER:

Safety-Kleen Corp. - 777 Big Timber Road - Elgin, IL, U.S.A. 60123
Telephone number: 1-800-669-5840
Safety-Kleen Canada Inc. - 3090 Blvd. Le Carrefour - Suite 300 - Chomedey Laval
Quebec, Canada H7T 2J7 Telephone number: 1-800-363-2260

PREPARATION INFORMATION

MSDS FORM NO.: 82310

REVISION DATE: January 15, 1992

ORIGINAL ISSUE DATE: July 20, 1989

SUPERSEDES: December 14, 1990

PREPARED BY: Product MSDS Coordinator

APPROVED BY: MSDS Task Force

TELEPHONE NUMBER: For Product Technical Information Call 1-312-694-2700 (U.S.A.):
1-800-363-2260 (Canada)

SECTION 2 -- HAZARDOUS COMPONENTS

NAME	SYNONYM	CAS NO.	WT%	OSHA PEL		ACGIH TLV		OTHER DATA	
				TWA (ppm)	STEL (ppm)	TWA (ppm)	STEL (ppm)	LD ⁵⁰	LC
Parts Washer Solvent (consists predominantly of C9-C13 saturated hydrocarbons)	Mineral Spirits	64741-41-9	85.0	100 ^c	N.Av.	100 ^c	N.Av.	>5000 ^c	>5500 ^{b,c} mg/m ³ /4 hours
C8 ⁺ Aromatics	N.Av.	mixture	12.0	N.Av.	N.Av.	N.Av.	N.Av.	N.Av.	N.Av.
*Xylene ^c	Dimethylbenzene	1330-20-7	1.0	100	150	100	150	4300	5000 ^b ppm/4 hours
*Ethylbenzene ^c	Phenylethane	100-41-4	0.5	100	125	100	125	3500	4000 ^d ppm/4 hours

SAFETY-KLEEN 105 SOLVENT

MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

*Toluene	Methylbenzene	108-88-3	0.5	100	150	100	150	5000	4000 ^d ppm/4 hours
*1,1,1-Trichloroethane	Methyl chloroform	71-55-6	0-0.5**	350	450	350	450	10300	18000 ^b ppm/4 hours
*Perchloroethylene	Tetrachloro-ethylene	127-18-4	0-0.5**	25	N.Av.	50	200	2629	34200 ^b mg/m ³ /8 hours

N.Av. = Not Available

*See Section 9-Other Regulatory Information

**Even though the concentration range does not fall under the ranges prescribed by WHMIS, this is the actual range which varies with each batch of the product.

^aOral-Rat LD50 (mg/kg)

^bInhalation-Rat LC50

^cFor Stoddard Solvent

^dInhalation-Rat LCLo

^eConstituent of C8⁺ Aromatics

SECTION 3 -- EMERGENCY AND FIRST AID PROCEDURES

EYES:	For direct contact, flush eyes with water for 15 minutes lifting upper and lower lids occasionally. If irritation or redness from exposure to vapor or mist develops, move victim away from exposure into fresh air. Consult physician if irritation or pain persists.
SKIN:	Remove contaminated clothing and shoes. Wash skin twice with soap and water. Consult physician if irritation or pain persists.
INHALATION: (Breathing)	Remove to fresh air immediately. Use oxygen if there is difficulty breathing or artificial respiration if breathing has stopped. Do not leave victim unattended. Seek immediate medical attention if necessary.
INGESTION: (Swallowing)	Seek immediate medical attention. Do NOT induce vomiting. If spontaneous vomiting occurs, keep head below hips to avoid aspiration (into lungs).
SPECIAL NOTE TO PHYSICIAN:	Treat symptomatically and supportively. Administration of gastric lavage, if warranted, should be performed by qualified medical personnel. Contact Rush Poison Control Center (see Section 1) for additional medical information.

SECTION 4 -- HEALTH HAZARD DATA AND TOXICOLOGICAL PROPERTIES

PRIMARY ROUTES OF EXPOSURE:	Eye and skin contact; inhalation, ingestion.
EXPOSURE LIMITS:	See Section 2.
SIGNS AND SYMPTOMS OF EXPOSURE	

ACUTE: *Eyes:* Contact with liquid or exposure to vapor may cause mild to moderate irritation with stinging, tearing or redness.

Skin: Contact tends to remove skin oils, possibly leading to irritation and dermatitis. No significant skin absorption hazard.

Inhalation (Breathing): High concentrations of vapor or mist may be irritating to the respiratory tract; may cause nausea; may cause headaches, dizziness, impaired coordination, anesthesia and other central nervous system effects.

Ingestion (Swallowing): Low order of acute oral toxicity. May cause irritation of the throat, nausea, vomiting, myocardial injury with arrhythmias and symptoms of central nervous system depression as listed for ACUTE Inhalation. Aspiration into the lungs during ingestion or vomiting may cause mild to severe pulmonary injury and possibly death.

CHRONIC: Prolonged or repeated skin contact may cause drying and cracking or dermatitis.

SAFETY-KLEEN 105 SOLVENT
MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

**MEDICAL CONDITIONS
AGGRAVATED BY
EXPOSURE:**

Individuals with pre-existing lung, cardiac, central nervous system or skin disorders may have increased susceptibility to the effects of exposure.

CARCINOGENICITY:

IARC classifies chemicals by their carcinogenic risk, including agents that are known, probable or possible carcinogens. NTP classifies chemicals as either known carcinogens or for which there is a limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals.

Perchloroethylene is listed by IARC as a possible carcinogen. Perchloroethylene is classified by NTP as having limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals.

Also see Section 9.

**OTHER POTENTIAL
HEALTH HAZARDS:**

The following information is required by Canadian WHMIS regulations. Irritancy is covered in Signs and Symptoms of Exposure in Section 4. There is no known human sensitization or toxicologically synergistic product associated with this material. Xylene and toluene have demonstrated experimental effects for reproductive toxicity, mutagenicity and teratogenicity. Studies indicate ethylbenzene and 1,1,1-trichloroethane are experimental teratogens.

SECTION 5 -- FIRE AND EXPLOSION HAZARD DATA

**EMERGENCY RESPONSE
GUIDE NUMBER:**

27
Reference Emergency Response Guidebook (DOT 5800.5)

**FIRE AND
EXPLOSION HAZARDS:**

Vapor explosion hazard may occur indoors, outdoors or in sewers. Decomposition and combustion products may be toxic. Heated containers may rupture, explode or be thrown into the air. Vapors are heavier than air and may travel great distances to ignition source and flash back. Not sensitive to mechanical impact. Material may be sensitive to static discharge, which could result in fire or explosion.

FIRE FIGHTING PROCEDURES:

NFPA 704 Rating 0-2-0 (Health-Fire-Reactivity)
Keep storage containers cool with water spray. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.

EXTINGUISHING MEDIA:

Carbon dioxide, foam, dry chemical or water spray.

CONDITIONS OF FLAMMABILITY:

Heat, sparks or flame.

FLASH POINT:

105°F (40°C) SETA

AUTOIGNITION TEMPERATURE:

473°F (245°C)

FLAMMABLE LIMITS IN AIR:

LOWER: 0.7 Vol. % UPPER: 6.0 Vol. %

**HAZARDOUS COMBUSTION
PRODUCTS:**

Burning may produce carbon monoxide.

SECTION 6 -- REACTIVITY DATA

STABILITY:

Stable under normal temperatures and pressures, and not reactive with water.

**INCOMPATIBILITY (MATERIALS AND
CONDITIONS TO AVOID):**

Acids, oxidizing agents or chlorine may cause a violent reaction. Avoid heat, sparks or flame.

HAZARDOUS POLYMERIZATION:

Not known to occur under normal temperatures and pressures.

SAFETY-KLEEN 105 SOLVENT
MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

**HAZARDOUS DECOMPOSITION
PRODUCTS:**

None under normal temperatures and pressures.

SECTION 7 -- PREVENTIVE MEASURES

PRECAUTIONS FOR SAFE USE AND HANDLING

**HANDLING
PRECAUTIONS:**

Keep away from heat, sparks or flame. Metal containers, including tank cars and trucks, should be grounded and bonded when material is transferred. Avoid contact with eyes, skin, clothing or shoes. Use in well ventilated area and avoid breathing vapor or mist.

**PERSONAL
HYGIENE:**

Use good personal hygiene. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products. Clean contaminated clothing, shoes and protective equipment before reuse. Discard contaminated clothing, shoes or protective equipment if they cannot be thoroughly cleaned.

**SHIPPING AND
STORING
PRECAUTIONS:**

Keep container tightly closed when not in use and during transport. Do not pressurize, cut, heat, weld, grind or expose containers to flame or other sources of ignition. Empty product containers may contain product residue. See Section 9 for Packing Group information.

**SPILL
PROCEDURES:**

Remove all ignition sources. Stop leak if you can do it without risk. Wear protective equipment specified in Section 7, CONTROL MEASURES. Ventilate area and avoid breathing vapor or mist. Water spray may reduce vapor; but it may not prevent ignition in closed spaces. For large spills, isolate area and deny entry; dike far ahead of liquid spill for later disposal. Contain away from surface waters and sewers. If possible, contain as a liquid for possible re-refining or sorb with compatible sorbent material and shovel with a non-sparking tool into closable container for disposal. See Emergency Response Guidebook (DOT P 5800.5) Guide Number 27 for more information.

**WASTE DISPOSAL
METHODS:**

Dispose in accordance with federal, state, provincial and local regulations. Contact Safety-Kleen regarding recycling or proper disposal.

CONTROL MEASURES

**EYE
PROTECTION:**

Where there is likelihood of eye contact, wear chemical goggles and faceshield. Do NOT wear contact lenses.

**PROTECTIVE
GLOVES:**

Use Nitrile, Viton[®] or equivalent gloves to prevent contact with skin. Do NOT use Butyl rubber, natural rubber or equivalent gloves.

**RESPIRATORY
PROTECTION:**

Use NIOSH/MSHA-approved respiratory protective equipment when concentration of vapor or mist exceeds applicable exposure limit. A self-contained breathing apparatus (SCBA) and full protective equipment is required for large spills or fire emergencies. Selection and use of respiratory protective equipment should be in accordance in the U.S.A. with OSHA General Industry Standard 29 CFR 1910.134 and in Canada with CSA Standard Z94.4-M1982.

**ENGINEERING
CONTROLS:**

Provide process enclosure or local ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where explosive mixtures may be present, systems safe for such locations should be used.

**OTHER PROTECTIVE
EQUIPMENT:**

Where spills and splashes are possible, wear appropriate solvent-resistant boots, apron or other protective clothing. Clean water should be available in work areas for flushing the eyes and skin.

SECTION 8 -- PHYSICAL DATA

**PHYSICAL STATE,
APPEARANCE AND ODOR:**

Liquid, clear, green with characteristic hydrocarbon odor

ODOR THRESHOLD:

Not available

SAFETY-KLEEN 105 SOLVENT
MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

SPECIFIC GRAVITY: 0.77 to 0.80 at 60/60°F (16/16°C) (water = 1)
DENSITY: 6.4 to 6.7 lbs/gal
VAPOR DENSITY: 4.9 (air = 1)
VAPOR PRESSURE: 2 mm Hg at 68°F (20°C)
BOILING POINT: 304 to 435°F (151 to 224°C)
FREEZING POINT: Not available
pH: 7 (water extraction)
VOLATILE ORGANIC COMPOUNDS: 100 WT %: 6.4 to 6.7 lbs/gal: 770 to 800 g/l
(US EPA DEFINITION)
EVAPORATION RATE: 0.1 (butyl acetate = 1)
SOLUBILITY IN WATER: Slight
COEFFICIENT OF WATER/OIL DISTRIBUTION: Not available
MOLECULAR WEIGHT: 142 (approximately)

SECTION 9 -- OTHER REGULATORY INFORMATION

TRANSPORTATION INFORMATION

DOT PROPER SHIPPING NAME: COMBUSTIBLE LIQUID, N.O.S. (Mineral Spirits)
DOT CLASS: Combustible Liquid
DOT ID NUMBER: NA1993, PGIII
TDG CLASSIFICATION: Naphtha. solvent. Class 3.3, UN1256, P.G. III

SARA TITLE III:

Product contains toxic chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372. Toxic constituents are listed with an asterisk in Section 2 of this Material Safety Data Sheet.

Product poses the following physical and health hazards as defined in 40 CFR 370.3 (Sections 311, 312 of SARA Title III):

Immediate (Acute) Health Hazard
Delayed (Chronic) Health Hazard
Fire Hazard

WHMIS CLASSIFICATION:

Class B3, Combustible Liquids;
Class D2A, Infectious and Toxic Materials, Other Toxic Effects, Very Toxic Material;
Class D2B, Infectious and Toxic Materials, Other Toxic Effects, Toxic Material

User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either expressed or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to information or the product to which information refers. The data contained on this sheet apply to the material as supplied to the user.



No. 952642

Date: 11-06-98

Clear Solutions to Contaminated Material Problems

Certificate of Assurance and Indemnification

For APEX AUTOMOTIVE

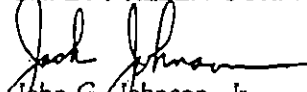
Safety-Kleen Corp. provides solvents for use in our equipment and in customer owned equipment. Safety-Kleen also removes contaminated materials from its customers' premises for processing. Safety-Kleen certifies to you that as long as you comply with applicable laws and regulations and the terms of your agreement with Safety-Kleen, Safety-Kleen assumes full responsibility for those materials once Safety-Kleen removes them from your facility:

- We agree to transport, store, recycle, reclaim, re-refine and dispose of the contaminated materials we remove from your facility in accordance with all applicable state and federal laws and regulations.
- In the event a spill occurs while we are transporting, storing, recycling, reclaiming, re-refining or disposing of your contaminated materials we will pay all costs and expenses to clean up that spill.
- In the event ground or water pollution results from our transporting, storing, recycling, reclaiming, re-refining or disposal of your contaminated materials, we will pay all costs and expenses to remedy that pollution.

Safety-Kleen agrees to indemnify, defend and hold you harmless from all liability arising from Safety-Kleen's transporting, storing, recycling, reclaiming, re-refining or disposing of your materials including, but not limited to the costs of any remedial action under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (also known as Superfund) or comparable state law, provided that you comply with applicable laws and regulations and the terms of your agreement with Safety-Kleen.

Over \$1,000,000,000 in Assets
NYSE Symbol: (SK)
D&B Rating: 5A2

SAFETY-KLEEN CORP.


John G. Johnson, Jr.
President and Chief Executive Officer

©1989 Safety-Kleen Corp. Printed in U.S.A. on recycled paper

Form 91445 Rev 11/95

0037-0110

TA00782

Certificate of Recycling

Issued to

Apex Auto Service Center

Mobile Lubrication Services, a Massachusetts corporation, with a recycling facility in Middleboro, hereby certifies that all of the used oil filters obtained from Apex Auto Service Center, 1 School Street, Pawtucket, Rhode Island shall be recycled in accordance with all applicable state and federal laws.

Recycling shall be accomplished as outlined below:

1. All saturated oil shall be removed from the used oil filter and recycled in accordance with 40 CFR 261.6 and 310 CMR 30.000.
2. After separation from the oil, all metal shall be cleaned, compacted and transported to a smelter for recycling into new metal in accordance with 40 CFR 261.6(a)(2) (iii); (a)(3)(iv).
3. All state and federal permits, authorizations, rules and regulations shall be satisfied.



Raymond Leblanc
President
Mobile Lubrication Services

February 17, 1993

EPA Generator #: MAD 9853 145 17

0037-0111

TA00783

THATCHERS ROW
P.O. BOX 71
MIDDLEBURY, MASS.
ZIP CODE 02346

INSURED
MOBILE LUBRICATION
SERVICE CO., INC.
3 ARBET LANE
MIDDLEBURY, MA
ZIP CODE 02346

NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND OR ALTER THE COVERAGE PROVIDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A USF&G INS. CO.
COMPANY LETTER B MORTIMER INS. CO.
COMPANY LETTER C AERNA CAS & SURETY
COMPANY LETTER D
COMPANY LETTER E

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POL PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN ARE HAVE BEEN PROVIDED BY THIS CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFF. DATE	POLICY EXP. DATE	LIMITS
B	GENERAL LIABILITY (X) COMMERCIAL GENERAL LIABILITY () CLAIMS MADE (X) OCCUR. () OWNER'S & CONTRACTOR'S PRO. (X) PFCGL ()	MA1301107	03/07/92	03/07/93	GENERAL AGGREGATE \$ 1,000 PRODUCTS-COMP/OP AGG. \$ PERSONAL & ADV. INJURY \$ EACH OCCURRENCE \$ 1,000 FIRE DAMAGE (ANY ONE FIRE) \$ MED. EXPENSE (ANY ONE PERS) \$
C	AUTOMOBILE LIABILITY () ANY AUTO () ALL OWNED AUTOS (X) SCHEDULED AUTOS () HIRED AUTOS () NON-OWNED AUTOS () GARAGE LIABILITY ()	FJ226/18731CA	09/08/92	09/08/93	COMBINED SINGLE LIMIT \$ BODILY INJURY (PER PERSON) \$ 250 BODILY INJURY (PER ACC) \$ 500 PROPERTY DAMAGE \$ 100
	EXCESS LIABILITY () UMBRELLA FORM () OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
A	WORKER'S COMPENSATION AND EMPLOYER'S LIABILITY	77137957	10/20/92	10/20/93	() STATUTORY LIMITS EACH ACCIDENT \$ 100 DISEASE-POLICY LIMIT \$ 500 DISEASE-EACH EMPLOYEE \$ 100
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

AFEX AUTO SERVICE CENTER
MR. AL TACCONE
ONE SCHOOL ST.
PAWTUCKET, RI
ZIP CODE 02862

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 20 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE
RALPH W. MANNING III

0037-0112

TA00784

CERTIFIED MAIL



7000 0600 0027 7661 5665



PAID
\$5.55
0000000000

Apex

100 MAIN STREET, PAWTHUCKET, RHODE ISLAND 02860

TO: David J. Newton
Remedial Project Manager
U.S. Environmental Protection Agency

P.O. Box 6329
Boston, MA 02114 - 6329

RETURN RECEIPT
REQUESTED

4/6
3-14

0037-0113

TA00785



TEKNOR APEX COMPANY

March 5, 1999

US Environmental Protection Agency
David J. Newton, RPM
NH and RI Superfund Section
Office of Site Remediation and Restoration
1 Congress St., Suite 1100, (Mail Code - HBO)
Boston, MA 02114-2023

Enclosed is Teknor Apex's information request responses for the Peterson/Puritan, Inc. Site, Operable Unit #2, the J. M. Mills Landfill. This response is for information requests initial addressed to:

Bertram Lederer, President
Custom Color, Inc.
c/o Teknor Color Co.
505 Central Ave.
Pawtucket, RI 02861

And

President
Teknor Apex
505 Central Ave.
Pawtucket, RI 02861

We have included Confidential Business Information within our response to this information request. To support such a claim of Confidentiality; disclosure of this Confidential Business Information would put the Respondent at a substantial disadvantage, if this information were to be made public.

If you have any questions, please do not hesitate to call at: 401 - 725 - 8000 ext. 137.

Very truly yours,

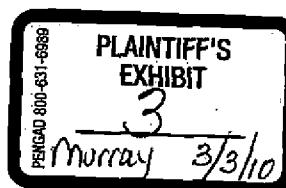
David F. Yopak
David F. Yopak
Director of Environmental, Health and Safety

cc:
Marc Silver (Knight, Holland)
Bill Murray

505 CENTRAL AVENUE • PAWTUCKET, RHODE ISLAND 02861-1900
TELEPHONE: (401) 725-8000 • FAX: (401) 725-8095 • www.teknorapex.com

0631-0013

TA00006



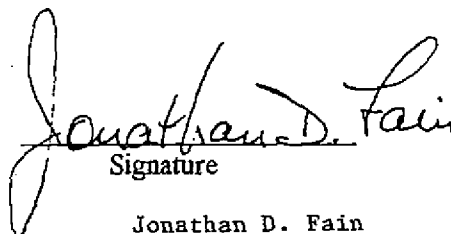
DECLARATION

I declare under penalty of perjury that I am authorized to

respond on behalf of Teknor Apex Company and that the
Respondent

foregoing is complete, true, and correct.

Executed on March 4, 1999


Signature

Jonathan D. Fain

Type Name

President

Title [if any]

0631-0014

TA00007

1.

a. Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861

b. for 505 Central Ave.
Diane Dandeneau
Environmental Manager
Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861
(401) 725 - 8000 x780
fax (401) 725 - 8095
ddandene@teknorapex.com

David Yopak
EHS Director
Teknor Apex Company
505 Central Ave.
505 Central Avenue
Pawtucket, RI 02861
(401) 725 - 8000 x 137
fax (401) 728 - 5680
dyopak@teknorapex.com

for 330 Oakhill Ave.
Jeremy LaFrancois
EHS Specialist
Teknor Apex Company
330 Oakhill Ave.
Attleboro, MA
(508) 222 - 2700 x 895
fax (508) 222 - 2850
jlafranc@teknorapex.com

for 20 Industrial Rd.
Lorraine Braunsdorf
Environmental Specialist
Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861
(401) 725 - 8000 x 233
fax (401) 728 - 5680
lbransdo@teknorapex.com

c. David Yopak
EHS Director
Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861
401-725-8000 ext. 137
401-728-5680
dyopak@teknorapex.com

d. Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861

Teknor Apex Company
90 Mendon Ave.
Pawtucket, RI 02861

Since the facilities at 505 Central Ave and 90 Mendon Ave, which are neighboring sites, were both operated at 505 Central Ave., they are reported as one for the purpose of this response.

Teknor Apex Company
330 Oakhill Ave.
Attleboro, MA 02703

Teknor Color Cumberland
20 Industrial Road
Cumberland, RI 02864

e.	505 Central Ave.	operations conducted from 7/1/68
	330 Oakhill Ave.	operations conducted from 7/1/68
	20 Industrial Road	operations conducted from 1/11/85

- f. for operations conducted at;
505 Central Ave: custom compounding of plastic resins, including the addition of fillers and color additives. Custom rubber blending and molding, including blocks and mats. Laboratories and Corporate Office.

330 Oakhill Ave.: custom compounding of plastic resins, , including the addition of fillers and color additives, manufacture of chemical additives for plastics compounds.

20 Industrial Road: custom compounding of plastic resins , including the addition of fillers and color additives.
- g. at 505 Central Ave.:
SIC used 3087, 3069, 4225

at 330 Oakhill Ave.
SIC used 3087, 2869

at 20 Industrial Rd.
SIC used 3087
- h. at 505 Central Ave.
Custom compounding of plastic resins, including the addition of fillers and color additives. Custom rubber blending and molding, including blocks and mats, tire tread compounds. Garden hose manufacturing. Manufacture of chemical additives for plastics compounds

At 330 Oakhill Ave:
Custom compounding of plastic resins, including the addition of fillers and color additives. Manufacture of chemical additives for plastics compounds.

At 20 Industrial Rd.
Custom compounding of plastic resins, including the addition of fillers and color additives.

- i. At 505 Central Ave.
"Commercial Solid Waste Reduction and Recycling Annual Report",
supplied to: RI DEM

At 330 Oakhill Ave:
None

At 20 Industrial Rd.
None

2.

- a. at 505 Central Ave. 639 current employees
at 330 Oakhill Ave. 115 current employees
at 20 Industrial Rd. 20 current employees
- b. at 505 Central Ave. and at 330 Oakhill Ave. (combined)
1968 – 1973 600 average employee estimates
1974- 1979 636 average employee estimate
1980 – 1985 700 average employee estimate
- at 20 Industrial Rd. no information for years previous to 1/11/85
1985 – 1986 average employee estimate 29

- c. at 505 Central Ave and At 330 Oakhill Ave.

i – ii: See response to question 2i

At 20 Industrial Rd.

i.	ii.
Custom Colorants, Inc	10/14/63 – 8/7/70
Custom Color, Inc.	8/7/70 – 4/25/85
Teknor Color company	4/26/85 to current

d.

i. - vi.

Respondent objects to providing financial information at this time, because such information bears no logical relationship to the purpose of the request served upon Respondent. It is also Respondent's understanding that a request for such voluminous confidential financial information at this initial information-request stage is inappropriate, and in direct conflict with U.S. EPA's own policy and guidance for issuance of CERCLA, Section 104(e) information requests. See U.S. EPA-OECA: "Transmittal of Sample Documents for More Effective Communication in CERCLA section 104(e)(2) Information Requests," (June 30, 1995) ("a request for financial information should be contained in the general notice letter") Respondent has gathered, and will preserve such information for future disclosures, should the same ever become relevant to any lawful inquiry by EPA or another agency.

Respondent provides information in response to Paragraph 2,d,i - vi under a claim of business confidentiality for all information on a separate sheet attached as Appendix A and are marked "Company Confidential."

e.

not applicable

f. at 505 Central Ave. and 330 Oakhill Ave.

i - date of Incorporation - 12/9/64

ii - State of Incorporation. - Delaware

iii - Agent for service

in RI: Tillinghast, Licht, & Semonoff
One Park Row
Providence RI 02903

iv - Current Offices

Chmn. Of Bd. & CEO - Norman M. Fain

Vice Chmn. Of Bd. - Victor J. Baxt

President - Jonathan D. Fain

Exec. V.P. - Herbert Malin

V.P. - Robert Billig

V.P. - William Murray

V.P. - John Andries

Secretary - Herbert Malin

Asst. Sec. - Jonathan D. Fain

Asst. Sec. - Norman G. Orodener

Treasurer - Robert L. Sutherland

Asst. Treas. - Herbert Malin

v - Current Directors

Norman Fain
Herbert Malin
Jonathan D. Fain
Victor J. Baxt

vi - Current Shareholder >5%

Victor J. Baxt
Norman M. Fain
Trust of Jonathan D. Fain
Trust of Martha Fain Roberts
Trust of Wendy Fain Stoltenburg

vii and vii Officers during period 1968-1986

DATE	DIRECTOR'S	TITLE
9/20/68	Norman M. Fain Irving J. Fain Victor J. Baxt Arthur J. Levy Herbert Malin	
9/30/68	Norman M. Fain Victor J. Baxt Herbert Malin Bertram L. Bernhardt Irving J. Fain Norman M. Fain Herbert Malin Arthur J. Levy	Board Chairman & CEO President Executive Vice President Vice President Treasurer Assistant Treasurer Secretary Assistant Secretary
1/8/69	Everyone Reelected	
1/14/70	Everyone Reelected	
1/26/73	Ralph P. Semonoff	Assistant Secretary
6/30/75	Norman M. Fain Victor J. Baxt Herbert Malin Jonathan D. Fain Ralph P. Semonoff	

6/30/75	Norman M. Fain Victor J. Baxt Herbert Malin Norman M. Fain Herbert Malin Jonathan D. Fain Herbert Malin Ralph P. Semonoff	Chairman & Chief Executive Officer President Executive Vice President Treasurer Assistant Treasurer Assistant Treasurer Secretary Assistant Secretary
5/25/76	Everyone Reelected	
1/16/77	Norman M. Fain Victor J. Baxt Herbert Malin Jesse Edenbaum Seaver Smith Philip Silver George Winchester Jr. Norman M. Fain Herbert Malin Jonathan D. Fain Herbert Malin Ralph P. Semonoff	Chairman & Chief Exec. Officer President Executive Vice President Vice President Vice President Vice President Vice President Treasurer Assistant Treasurer Assistant Treasurer Secretary Assistant Secretary
9/12/78	Norman M. Fain Victor J. Baxt Herbert Malin Jesse Edenbaum Seaver Smith Philip Silver Philip W. Morse George Winchester Jr. Jonathan D. Fain Herbert Malin Herbert Malin Jonathan D. Fain Ralph P. Semonoff	Chairman & Chief Exec. Officer President Executive Vice President Vice President Vice President Vice President Vice President Vice President Treasurer Assistant Treasurer Secretary Assistant Secretary Assistant Secretary
4/2/80	Everyone Reelected	
11/18/80	Jonathan D. Fain Robert Sutherland	Vice President Treasurer

1/30/84 Norman M. Fain
Jonathan D. Fain
Victor J. Baxt
Herbert Malin
Ralph P. Semonoff

1/30/84	Norman M. Fain	Chairman & Chief Exec. Officer
	Victor J. Baxt	President
	Herbert Malin	Executive Vice President
	Jonathan D. Fain	Vice President
	Jesse Edenbaum	Vice President
	Seaver Smith	Vice President
	Philip Silver	Vice President
	Philip W. Morse	Vice President
	George Winchester Jr.	Vice President
	Robert Sutherland	Treasurer
	Herbert Malin	Assistant Treasurer
	Herbert Malin	Secretary
	Jonathan D. Fain	Assistant Secretary
	Michael R. Goldberg	Assistant Secretary
	Ralph P. Semonoff	Assistant Secretary

1/16/86 Everyone Reelected

ix - Same as vi plus Herbert Malin

at 20 Industrial Rd.

- i. 10/14/63
- ii. Rhode Island
- iii. Tillinghast, Licht & Semonoff
One Park Row
Providence, RI 02903

iv.	Chm. of Board & CEO:	Jonathan D. Fain	
	Vice Chm. Of Board:	Victor J. Baxt	
	President:	Bertram M. Lederer	
	Secretary:	Herbert Malin	
	Treasurer:	Herbert Malin	
	Assistant Secretary:	Norman G. Orodanker	
	Assistant Secretary:	Norman M. Fain	
v.	Norman M. Fain		
	Herbert Malin		
	Jonathan D. Fain		
	Victor J. Baxt		
vi.	Teknor Apex Company		
vii.	Unknown prior to 12/28/84		
		At 12/28/84:	From 1/11/85 to end of Period:
	Chm. of Board & CEO:		Jonathan D. Fain
	Vice Chm. Of Board:		Philip W. Morse
	President:	Hugh Aaron	Bertram M. Lederer
	Executive Vice President:		Philip W. Morse
	Senior Vice President:	John Palazzini	John Palazzini
	Vice President of Admin.:	Edith Bargar	Edith Bargar
	Vice President of Mfg - (Cumberland Facility):	Wilfred P. Gravel	Wilfred P. Gravel
		At 12/28/84	From 1/11/85 to end of period
	Vice President of Mfg - (Ohio Facility):	Edward LaFlamme	Edward LaFlamme
	Treasurer:	Hugh Aaron	Herbert Malin
	Secretary:	Benjamin Cheater	Herbert Malin
	Assistant Treasurer:	Joyce Aaron	
	Assistant Secretary:		Norman G. Orodanker
	Assistant Secretary:		Norman M. Fain

viii. Unknown prior to 12/28/84

At 12/28/84:

Hugh Aaron
Benjamin Cheater
Joyce Aaron
Guy Martinelli
Alvan Myerson
Edith B. Bargar
John J. Palazzini

At 1/11/85 and all times subsequent:

Norman M. Fain
Herbert Malin
Jonathan D. Fain
Victor J. Baxt

ix. Unknown prior to 1/10/85

At 1/10/85:

Hugh Aaron
Citizens Trust Company,
Trustee of the Customcolor,
Inc. Employee Stock
Ownership Trust

At 1/11/85 and all times subsequent:

Teknor Apex Company

g. NA

h. NA

i. For 505 Central Ave and 330 Oakhill Rd.

i.-iii.

Respondent was formerly known as Thompson Apex Company, which first became affiliated with the 505 Central Avenue operations in July 1968. In July 1969, Thompson Apex Company changed its name to Teknor Apex Company.

iv

In January 1985, Respondent acquired the stock of Custom Color, Inc. with manufacturing sites in Cumberland, RI and Lodi, OH. The corporate name was changed from Custom Color, Inc. to Teknor Color Company on April 26, 1985 and it remains a wholly-owned subsidiary.

In September 1969, Respondent incorporated Haywood Company in Delaware with a manufacturing facility in Tennessee and it remains a wholly-owned subsidiary.

In April 1977, Respondent incorporated Maclin Company in Delaware with a manufacturing facility in California and it remains a wholly-owned subsidiary.

All corporate addresses are:
505 Central Ave.
Pawtucket RI 02861

For 20 Industrial Dr.

Teknor Color Company (formerly Customcolor, Inc.) is and has been a wholly owned subsidiary of Teknor Apex Company since its acquisition on January 11, 1985. The existence of any such Affiliations prior to January 11, 1985 is unknown.

j. N/A

k. N/A

l. N/A

m. N/A

APPENDIX B
RESPONSES TO QUESTIONS 4 – 8 FOR
505 CENTRAL AVE.

JM Mills Site Information Request for the Time Period of 1954 to 1986

Question 4 Compliance with This Request

Name (i)	Current Position (ii)	Job Title during period of investigation (iii)	Job Description	Current or past employee (iv)
Ronald Sito	Personnel Manager	Rubber operator, Hose Dept Manager	manufactured rubber products; managed hose manufacturing operation	Current
Arthur Laroach	Maintenance Oiler	Plastics Dicer Operator, Bagger Leadman, Mill Leadman	manufactured plastic compounds; oversaw manufacturing process as leadman	Current
John Grimaldi	Maintenance Porter	Rubber Banbury Operator, Mill Operator, Compounder, Leadman	manufactured rubber compounds; oversaw manufacturing process as leadman	Current, retiring on 3/15/99
Edward Lapati	Rubber Production Supervisor	Rubber Banbury Operator, Leadman, Supervisor	manufactured rubber compounds; oversaw manufacturing process as leadman and supervisor	Current
Arthur LaPerche	Retired	Plasticizer Operator, Plasticizer Manager (at Mendon Avenue)	manufactured plasticizer at Mendon Avenue site	Retired
Herb Malin	Executive Vice President	Engineer Vice President of Manufacturing	overall process knowledge	Current

- v. Divisions for which records were reviewed: Teknor Apex Company
- vi. The nature of the written documents reviewed are related to waste handling at the facility. These documents date back to 1980. Written records dated 1980 through 1986 were reviewed. These were compiled by Ron Sito of Teknor Apex (former Safety and Environmental Manager - refer to section 7).
- vii. These records were kept in Environmental Manager's Office.
- viii. These records are currently kept in the Environmental Manager's Office.

Question 5 Generation of Waste During Time of Disposal

a) Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861

b)

Process	Commenced	Ceased	Location
Rubber Compounding (Tread Rubber)	1968	1993	505 Central Ave.
Rubber Compounding & Molding (Blocks)	1968	present operation	505 Central Ave.
Rubber Molding (Mats)	1977	present operation	505 Central Ave.
Rubber Compounding (Solite - shoe soling)	1968	1984	505 Central Ave.
Plastics Compounding (PVC)	1968	present operation	505 Central Ave.
Garden Hose Manufacturing	1968	1992	505 Central Ave.
Thermoplastic Elastomer (TPE) Compounding	1980	present operation	505 Central Ave.

c)

Process	Changes in operation
Rubber Compounding (Tread Rubber)	Production moved to Tennessee plant in 1993.
Rubber Compounding & Molding (Blocks/ Mats)	Production increased in these areas with the deletion of other products.
Rubber Compounding (Solite -- shoe soling)	Production ceased in early 1990s.
Plastics Compounding (PVC)	4 production lines through 1968, 5 lines through 1980, 6 lines through 1986 with the addition of a line which manufactured non-toxic, medical grade PVC.
Garden Hose Manufacturing	Production moved to other TA plants in 1993.
Thermoplastic Elastomer (TPE) Compounding	Began in Plastics department; changed to Rubber department in 1984.
Manufacturing chemical additives for plastics compounds	Production moved to Massachusetts plant.

- d) Rubber Compounds for Tires
 Rubber Compounds for Blocks and Mats
 Rubber Blocks and Mats
 Polyvinyl Chloride (PVC) Compounds
 Thermoplastic Elastomer (TPE) Compounds
 Chemical additives for plastics compounds

e)

Process	Raw Materials
Rubber Compounding/ Manufacturing	Rubber blocks, zinc stearate, carbon black, sulfur, accelerators, fillers, oils
PVC Compounding	PVC resin, calcium carbonate, plasticizers, colorants, lead compounds, stabilizers
TPE Compounding	Rubber blocks, zinc stearate, carbon black, sulfur, accelerators, fillers, oils, plasticizers
Chemical additives for plastics compounds (plasticizer).	C ₄ -C ₁₃ alcohols, phthalic anhydride, organic acids, sulfonic acid, filter aides (clay)

- f) MSDSs were not available until 1986, and therefore are not provided.

- g) At 505 Central Avenue location, all departments (Plastics and Rubber) used kerosene (#2 fuel oil) to clean equipment. An estimated 400 gallons was used per year.

At Mendon Avenue location, equipment was washed down with water to a tank. The water was transferred to the drain and the plasticizer was recovered and used in the production of OGAP (Off Grade Alcohol Phthalates), a lower grade plasticizer.

h)

Types of Materials Spilled	Materials/Methods used to Cleanup Spills	Disposal of Spilled Material
Chemical additive to plastic	PVC Resin was used to absorb plasticizer and dry material was swept into containers.	Material was recycled into hose product.
Oils (used in maintenance or rubber)	Speedi-dri was used to absorb oil and material was placed into bags, containers, or drums depending on volume.	Material was disposed of in dumpster and removed by waste hauler.

No documentation supports any transfer of any material to the Site.

- i) Refer to attachment I to this section, Process Flow Diagrams.

Question 6 Respondents Wastes and Waste Streams (including By-Products)

a) See attached Waste Survey

b)

Waste Name	Physical State	Chemical Composition	Color	Odor	Monthly Volume	Dates Generated
Burnt Rubber Batches	solid	styrene butadiene rubber nitrile butadiene rubber natural rubber	black brown gray	none	unknown	Throughout period
Cured Rubber Scrap, Flash, and Dust	solid	styrene butadiene rubber nitrile butadiene rubber natural rubber	black brown	none	unknown	Throughout period
Burnt PVC Batches	solid	PVC	various	none	unknown	Throughout period
Maint. Waste oil	liquid	maintenance oil including gear oil, motor oil, gasoline, lube oil. etc.	brown	oil	unknown (small amounts)	Throughout period
Plasticizer	liquid	plasticizers, used in Rubber manufacturing	clear, yellow, brown	slight	unknown	Throughout period
Unused raw materials	solids/ liquids	carbon black, calcium carbonate, rubber, unrecyclables	various	various	unknown (small amounts)	Throughout period
Filter Press Cake from Plasticizer	solids/ liquids	plasticizers, various solids generated in manufacture of plasticizer	yellow black		unknown	1968-1970

No documentation supports any transfer of any material to the Site.

c) Refer to attached Process Flow Diagrams (attachment 1).

d) There was no single person responsible for waste collection and management until 1988. Each department had supervisors who handled disposition of waste from that department. In 1988, Ron Sito became Safety and Environmental Manager.

e)

Waste Name	Type of Container Stored in	Location of Collection	Location of Storage
Burnt Rubber Batches	none	Rubber Department	Dumpster in Receiving Department
Burnt PVC Batches	none	Plastics Department	Dumpster in Receiving Department
Waste oil	drum	each department	Warehouse at Mendon Ave
Unused raw materials	various - bags, metal drums, cardboard drums	each department	Dumpster in Receiving Department
Miscellaneous Solvents	drums	Rubber Department Mendon Avenue	Drums stored at Mendon Avenue
Filter Press Cake	metal drums	Mendon Avenue	Mendon Avenue

No documentation supports any transfer of any material to the Site.

Question 7 Respondents Disposal/Treatment/Storage/Recycling/Sale of Waste

a) Identify persons who currently have and those who have been responsible for disposal of waste

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Diane Dandeneau	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x780		Teknor Apex Company, Environmental Manager	
Ronald Sito	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x281		Teknor Apex Company, Safety and Environmental Manager	

- b) There are many persons who currently have and/or have had knowledge of the disposal of waste. Those questioned for this information request are listed below:

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Arthur Laroache	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000 x 260		Teknor Apex Company, Maintenance Oiler	
John Grimaldi	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000		Teknor Apex Company, Maintenance Porter	
Arthur LaPerche	Retired	34 Maybury Street Cumberland, RI 02864 (401) 334-2329	Teknor Apex Company, Plasticizer Production Operator	
Herb Malin	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000 x 380		Teknor Apex Company, Executive Vice President	

- c) Persons currently having and those who have had responsibility for Environmental Affairs

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Diane Dandeneau	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x780	29 Laconia Road Cranston, RI 02921 (401) 946-7579	Teknor Apex Company, Environmental Manager, 10/97 - present	
Laura Salamy (former employee)	Precision Art and Pac Glass, Inc 22 Almeida Ave. East Providence, RI 02914 (401) 438-9800			
Tim Coady (former employee)				
Ronald Sito	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x281		Teknor Apex Company, Safety and Environmental Manager, 1990-1995	

d)

Name	Job Title with dates	Supervisor	Current Position	What type of information is possessed?
Diane Dandeneau	Environmental Manager	Christopher ReCasino	same	overall plant environmental knowledge (present)
Ronald Sito	Rubber operator, Hose Dept Manager, Safety and Environmental Manager (1990-1995), Personnel Manager (1995-present)	Paul Dubanowitz Christopher ReCasino	Personnel Manager	general plant production and environmental knowledge (1968 - present)
Arthur Laroach	Plastics Dicer Operator, Bagger Leadman, Mill Leadman, Med Line Operator, Maintenance Oiler	Don Brown	Maintenance Oiler	PVC manufacturing and maintenance experience (1968 - present)
John Grimaldi	Rubber Banbury Operator, Mill Operator, Compounder, Leadman, Maintenance Porter	Mark Eddeleston	Maintenance Porter	Rubber manufacturing and maintenance experience (1968 - present)
Arthur LaPerche	Plasticizer Operator, Plasticizer Manager		Retired	Knowledge of Plasticizer production at Mendon Avenue from 1968-1970.
Herb Malin	Plastics Engineer, Vice Present of Manufacturing, Executive Vice President	Jonathan Fain	Executive Vice President	Technical knowledge of plasticizer and plastics manufacturing process

e)

Waste Name	Type of Container Stored in	Description of Container	Used Container Prior Use
Burnt Rubber Batches	none	not applicable	not applicable
Burnt PVC Batches	none	not applicable	not applicable
Waste oil	drum	metal drums, most likely black	waste oil
Unused raw materials	various - bags, metal drums, cardboard drums	used cardboard drums were typically blue	Pigment raw materials
Filter Press Cake	metal drums	metal drums, most likely black	unknown

No documentation supports any transfer of any material to the Site.

- f) Records date back to 1980 only. Therefore, information contained below is based on records from 1980 - 1986.

Waste Name	Where Disposed of (r & h)	Who Carried it (i,j,k)	What was the Frequency of Shipment (l)	What was the Volume of Shipments (m)	Dates from and to material was shipped (n)
Waste Oil (manifested)	a) Murphy Waste Oil Woburn, MA b) Narragansett Improv. Co, Providence, RI	McDonald & Watson	Twice per year from 1980 - 1985		
Waste Oil (manifested)		East Bay Waste Oil	Once in 1986		
Waste Oil (manifested)	Olsen Greenhouses Raynham, MA	Sampson Oil	once in 1986	1736 gals.	11/13/86
Waste Oil (manifested)	Lionetti Oil Recovery, Inc. Old Bridge, NJ	Oil Recovery Corporation	once in 1986	1800 gals.	12/12/86
Waste Solvents	Solvent Recovery Service of New England	same	Three times in 1984	25,80, and 24 drums MEK, alcohols, misc solvents	3/84, 6/84, 6/84

No documentation supports any transfer of any material to the Site,

- o) Copies of Manifests or Bills of Lading - see attached.
- p) No knowledge of types of vehicles used.
- q) No knowledge of carrier's employees except for names on manifest documents from 1980 to 1986.
- r) Listed in table in section f. Ultimate disposal assumed to be same location.
- s) Listed in table in section f. Ultimate disposal assumed to be same location.
- t) Information on how Teknor Apex managed waste pickups is unknown.
- u) The Respondent did not select the destination(s) for off site solid waste disposal.
- v) Ron Sito, Environmental manager from 1988.

- w) This information is unknown. Dry material may have been washed into drains which ultimately flowed into the POTW.
- x) The Blackstone Valley District Commission
102 Campbell Avenue
East Providence, RI 02916
at present: The Narragansett Bay Commission
235 Promenade Street
Providence, RI 02908
- y) See Waste Survey.
- z) No documentation supports any transfer of any material to the Site.

Question 8 - Respondent's Environmental Reporting

- a) Central Avenue: RID045367968
Mendon Avenue: RID987480357
- b) None
- c) Not applicable
- d) Rhode Island Department of Environmental Management
Division of Air and Hazardous Materials
Room 204 Cannon Building
Providence, RI 02908

Rhode Island Department of Environmental Management
Division of Air and Hazardous Materials
75 Davis Street
Providence, RI 02908

Rhode Island Department of Environmental Management
Division of Waste Management
291 Promenade Street
Providence, RI 02908
- e) 1985-present

- f)
 - 1) Emergency Planning and Community Right to Know Act, 42 U.S.C. 1101 (EPCRA)
 - 2) SARA Section 313 Title III - Form R Reporting
 - 3) RI Air Pollution Control Regulations
 - 4) Resource Conservation and Recovery Act, Title 40 CFR Parts 260 - 279
 - 5) RI Rules and Regulations for Hazardous Waste Management
 - 6) Rules and Regulations for The Use Of The Wastewater Facilities Within The Narragansett Bay Water Quality Management District
 - 7) SARA Title III, Section 312, Tier II

- g) EPCRA Reporting Center
PO Box 3348
Merrifield, VA 22116

RI Department of Environmental Management
Division of Air Resources
235 Promenade Street
Providence, RI 02908

The Narragansett Bay Commission
235 Promenade Street
Providence, RI 02908

State Emergency Response Commission
c/o Department of Labor and Training
Division of Occupational Safety
610 Manton Avenue
Providence, RI 02909
City of Pawtucket
Fire Prevention Office
155 Roosevelt Avenue
Pawtucket, RI 02760

LEPC District 4
Pawtucket Fire Department
145 Roosevelt Avenue
Pawtucket, RI 02760

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

Information Request Waste Survey

Name of Respondent: Diane Dandeneau

Respondent's Location: Teknor Apex Company
505 Central Avenue
Princeton, NJ 08541 Date: 2/18/99

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Acids				
Adhesives	5gal pails, 55gal drums	Block Glues	*	dumpster
Asbestos (incl. Insulation and transite piping)	solid pipe insulation			dumpster
Adsorbents (from spills, leaks, etc.)	solid	Speedi-Dri	*	dumpster
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				

* No documentation supports any transfer of any material to the Site

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	Lubricants				
	Oils				
	Oil Filters				
	Transmission fluids				
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals	waste solvents Carbon black, solid	various	*	recycled - stored at warehouse unused material thrown in dumpster
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				

* No documentation supports any transfer of any material to the Site
11

TA00031

0631-0038

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Etching Solutions				
Filters				
Flammable, Reactive, or Explosive Materials				
Fungicides				
Herbicides				
Insecticides				
Insulating/Fire Proofing Materials				
Laboratory Wastes	liquids, solids		*	disposed in sink
Lubricants	grease hydraulic fluid		*	stored at warehouse
Metals:				
grindings				
powders				
shavings				
sludges				
solutions				

* No documentation supports any transfer of any material to the Site

TA00032

0631-0039

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
other: (e.g. tanks)				
Paint and Coating Wastes:	liquid/solid		*	dumpster
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				

* No documentation supports any transfer of any material to the Site

TA00033

0631-0040

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	Photography Wastes:				
	developers				
	fixers				
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				
	inks				
	dyes				
	other:				
	Rags, Used (Indicate prior use)	cleaning → Kerosene		*	dumpster
	Rodenticides				
	Septic System Wastes				
	Sludges				

*No Documentation supports any transfer of any material to the Site

v

TA00034

0631-0041

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	Soldering Solutions				
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				
	Solvents				
	Waste Oils	liquid	gear oil, lube oil, misc maintenance oil	*	stored in drums at Rendon Warehouse
	Wood Preservatives		plasticizers, Rubber process oil, #2 fuel oil		
	Other:				

* No documentation supports any transfer of any material to the Site



**State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625**

Use print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <u>62-9-0-0</u>		Manifest Document No. <u>0000</u>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.*			
3. Generator's Name and Mailing Address <u>FRANK SHERLOCK CORP.</u> <u>9410070A RD.</u> <u>ATLANTIC CITY, NJ 08401</u>						A. State Manifest Document Number NJA0259361					
						B. State Gen. ID# <u>SAME</u>					
4. Generator's Phone <u>609-735-0523</u>						C. State Transporter ID# <u>NJDEPS-058539</u>					
5. Transporter 1 Company Name <u>ELI B. RECOVERY CORP.</u>						D. Transporter's Phone <u>413-727-2949</u>					
6. US EPA ID Number <u>111000100101010</u>						E. State Transporter 2 ID# <u>NJDEPS-058539</u>					
7. Transporter 2 Company Name <u>ELI B. RECOVERY CORP.</u>						F. Transporter's Phone <u>413-727-2949</u>					
8. US EPA ID Number <u>111000100101010</u>						G. State Facility ID# <u>201-721-0986</u>					
9. Designated Facility Name and Site Address <u>ELI B. RECOVERY CORP.</u> <u>1000 E. 10TH ST.</u> <u>ATLANTIC CITY, NJ 08401</u>						H. Facility's Phone <u>201-721-0986</u>					
10. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) <u>HAZARDOUS WASTE</u>						12. Containers		13. Total Quantity		14. Waste No.	
						(EST.)					
11. Additional Descriptions for Materials Listed Above <u>Gear + Hyd.</u> (L) <u>HAZARDOUS OIL</u>						13. Handling codes for Wastes Listed Above <u>HAZARDOUS</u>					
15. Special Handling Instructions and Additional Information											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and as applicable state laws and regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.											
Printed/Typed Name <u>FRANK SHERLOCK</u>						Signature <u>Frank Sherlock</u>			Date <u>1/18/88</u>		
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name <u>RICHARD GILFILL</u>			Signature <u>Richard Gilfill</u>		
									Date <u>1/18/88</u>		
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name <u>Joseph R. Roud</u>			Signature <u>Joseph R. Roud</u>		
									Date <u>1/18/88</u>		
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19											
Printed/Typed Name <u>Mark Chene</u>						Signature <u>Mark Chene</u>			Date <u>1/18/88</u>		

0631-0043

TA00036

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME TAM

ADDRESS _____

COMMODITY WASTE OIL

CARRIER OIL RECOVERY

REMARKS 44-DRUMS

CONS. NO. _____

IDENT. _____

DATE _____

TIME _____

GROSS _____

TARE DRIVER ON _____

OFF ☒

NET @ _____

PER LB. _____

PRICE _____

SHIPPER TAM

WEIGHER OC

FAIRBANKS SCALE CAT. 083930

44
360
1402

14580

TA00037

0631-0044

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMER'S NAME

TAM

ADDRESS _____

COMMODITY

WASTE OIL

CARRIER

OIL RECOVERY

REMARKS

44-DRUMS

CONS. NO.

IDENT.

DATE

TIME

554553# 966030 12-12-86 12:34PM 45340 lb

GROSS

554554# 966030 12-12-86 9:07AM 31760 lb

TARE - DRIVER ON

OFF

14.580

NET @ PER LB.

PRICE

SHIPPER

TAM

WEIGHER

OB

FAIRBANKS SCALE CAT. 083930

TA00038

0631-0045

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMER'S NAME TAM

ADDRESS _____

COMMODITY WASTE OIL

CARRIER OIL RECOVERY

REMARKS 44-DRUMS

CONS. NO.	IDENT.	DATE	TIME	WEIGHT	
654563#	966030	12-12-86	12:34PM	46340 lb	GROSS

654554#	966030	12-12-86	9:07AM	31760 lb	TARE DRIVER ON

NET @ 14.580 OFF ☒ PER LB.

PRICE _____

SHIPPER TAM

FAIRBANKS SCALE CAT. 083930

WEIGHER OB

TA00039

0631-0046

OIL RECOVERY CORPORATION

P.O. BOX 1065
WEST SPRINGFIELD, MA 01090
413-737-2949

0573

0453768
E.P.A. #

P.O.# or Job#
NR 02573-1
Manifest #

12-12-86
Date
Driver
Coordinator

JOB SITE
TENNIS AVE
PAWTHUCKET, R.I.

Contact Person

Phone #

MATERIAL

Description
WASTE OIL NOS
INDUSTRIAL OIL
NIP 1270
Comments
Time
Portal A.M. P.M.
Portal A.M. P.M.
Arrival Time 8:30 A.M. P.M.
Departure Time 12:30 A.M. P.M.
Shipped To:

BILL TO

Contact Person

Phone #

EQUIPMENT

Qty	Type	Hrs.	Rate	Am't
1	SILVERMAN			

DISPOSAL

BARRELS GALLONS

Qty.	BARRELS	GALLONS
Liquid		1300
Solid		
Mass. Sur. Chg. ()		
Mass. Lubricating Oil Cert #		

TOTALS

Labor
Material
Equipment
Disposal (Liquid)
Disposal (Solid)
Mass. H.W.T.
Mass. Sales Tax
I as the authorized agent of the above mentioned generator/transporter, declare that the description of the product is true and correct.

C.O.D. /

CHARGE

NET 10 DAYS

☒ PICK UP

☐ DELIVERY

DATE

12/12/86
AUTHORIZED SIGNATURE

0631-0047

TA00040

TEKNOR APEX COMPANY

☐ ARMISTICE
BLVD. .

RECEIVING REPORT

Date 12/12 1976

Received From W. B. Rogers

Shipped From _____

Delivered By 77

[illegible]

0631-0048

TA00041

OIL RECOVERY CORPORATION

P.O. Box 1065
720 Union Street
WEST SPRINGFIELD, MA 01090

(413) 737-2949

TO: TEKNOR APEX
MENDON AVENUE
PAWTUCKET RI 02860
ATTENTION: ACCOUNTS PAYABLE

INV.#0573

SALESPERSON	DATE OF INVOICE
	12/26/86
SHIP TO	
(12)	

PURCHASE ORDER

PLEASE SHOW THIS NUMBER ON
PACKAGES AND ALL DOCUMENTS.

2523

EX COMPANY
WAREHOUSE
R.I. 02862

ACCOUNT NO.	DATE SHIPPED	SHIPPED VIA	COL	PP	F.O.B. POINT	TERMS	YOUR ORDER NUMBER
	12/12/86	OUR TRUCKS			NJAO259361	NET 10 DAYS	
QUANTITY	DESCRIPTION					UNIT PRICE	AMOUNT
1800	WASTE OIL N.O.S. COMBUSTIBLE LIQUID					.45	810.00
1	MANIFEST CHARGE					1.00	1.00
PLEASE TURN IN PINK COPY WITH PAYMENT							
						TOTAL	\$811.00

11/19/87

Thank you

AB 11/9/87

Thank You

ORIGINAL ORDER
ORDER VALUE
1,350.00

/86

ORIGINAL

REMARKS
RECEIVING CLERK
<i>Jim P. (7B)</i>

0631-0049

TA00042



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Division of Air and Hazardous Materials

75 Davis Street, Providence, RI 02908

(401) 277-2797

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2000-0464, Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. RI0045367968	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law, but may be required by state law.
3. Generator's Name and Mailing Address TEKNO APEX CO. 505 CENTRAL AVE PAWTUCKET			A. State Manifest Document Number RI A 0009253		
4. Generator's Phone (401) 725 8000			B. State Generator's ID RI0045367968		
5. Transporter 1 Company Name SAMSON OIL BORO MA			C. State Transporter's ID MA0075693572		
6. Transporter 1 US EPA ID Number MA0075693572			D. Transporter's Phone 617-761-6313		
7. Transporter 2 Company Name			E. State Transporter's ID A-70603		
8. Transporter 2 US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address OLSON'S GREENHOUSES 590 SOUTH ST. RAYNHAM MA			G. State Facility's ID MA005973373		
10. US EPA ID Number 378			H. Facility's Phone 617-822-1151		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. WASTE OIL, NOS COMBUSTIBLE UN1270				TT 1736	G
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
a.			a. SOP		
b.			b. 701		
c.			c.		
d.			d.		
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name FRANK L. BRADBURY			Signature <i>Frank L. Bradbury</i>		Date 11/13/95
17. Transporter 1 Acknowledgement of Receipt of Materials			Printed/Typed Name Frank H. Battaglia		Signature <i>Frank H. Battaglia</i>
18. Transporter 2 Acknowledgement or Receipt of Materials			Printed/Typed Name		Signature
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name Anthony Loretto			Signature <i>Anthony Loretto</i>		Date 11/13/95

rm 8700-22 (3-84)

Copy 3: Generator Completed Copy-Mailed by TSDF

0631-0050

TA00043

Copy 3: Generator Completed Copy-Mailed by TSDF

RI A 0009253



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Division of Air and Hazardous Materials

75 Davis Street, Providence, RI 02908

(401) 277-2797

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's USEPA ID No. RI0045367968	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law, but may be required by state law.
3. Generator's Name and Mailing Address TEKNOV APEX CO 505 CENTRAL AVE DARTMOUTH CT		A. State Manifest Document Number RI A 0009253		B. State Generator's ID RI0045367968	
4. Generator's Phone (401) 725-8000		C. State Transporter's ID MA005693572		D. Transporter's Phone 617-761-6315	
5. Transporter 1 Company Name SAMSON OIL BORON		E. State Transporter's ID A-20603		F. Transporter's Phone	
6. Transporter 2 Company Name		G. State Facility's ID MA005693572		H. Facility's Phone 617-822-1151	
7. Designated Facility Name and Site Address OLSON'S GREENHOUSES 590 SOUTH ST. RAYNHAM MA		8. US EPA ID Number MA005693572		9. US EPA ID Number 378	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. WASTE OIL, NOS COMBUSTIBLE UN1270		12. Containers No. 1	Type TT	13. Total Quantity 1736	14. Unit G
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above a. S02 b. T01 c.			
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name FRANK L. BRADBURY		Signature <i>Frank L. Bradbury</i>		Date Month Day Year 11 19 86	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Ed L. H. Smith		Signature <i>Ed L. H. Smith</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Date Month Day Year	

EPA Form 8700-22 (3-84)

Copy 8: Generator Copy

0631-0051

TA00044

Copy 8: Generator Copy

RI A 0009253



STATE OF RHODE ISLAND
ARTMENT OF ENVIRONMENTAL MANAGEM.
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2000-0404 Expires 7-31-86

Copy 1: Destination State Mailed by TSDf

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. RI0045367968	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law, but may be required by state law.
3. Generator's Name and Mailing Address TEKNOV ADEX CO. 505 CENTRAL AVE. PAWT. RI 02861			A. State Manifest Document Number RI A 0009252		
4. Generator's Phone (401) 725-8000			B. State Generator's ID RI0045367968		
5. Transporter 1 Company Name SAMSON OIL			6. US EPA ID Number MAD075683572	C. State Transporter's ID MAD075683572	
7. Transporter 2 Company Name N/A			8. US EPA ID Number	D. Transporter's Phone 617 761 6315	
9. Designated Facility Name and Site Address MURPHY WASTE OIL WOBURN MASS			10. US EPA ID Number MAD066588005	E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID MAD066588005	
				H. Facility's Phone 617 272 4211	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Unit
a. M001 EPA USED MOTOR OIL DOT 1270			No. Type	Quantity	Wt/Vol
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
a. USED MOTOR OIL			a.		
b.			b.		
c.			c.		
d.			d.		
15. Special Handling Instructions and Additional Information					

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name FL BRADSHAW	Signature <i>[Signature]</i>	Month Day Year 10 2 86
17. Transporter 1 Acknowledgement of Receipt of Materials		Date
Printed/Typed Name SAM BATTAGLIA	Signature Samuel P. Battaglia	Month Day Year 10 02 86
18. Transporter 2 Acknowledgement or Receipt of Materials		Date
Printed/Typed Name	Signature	Month Day Year
19. Discrepancy Indication Space		
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		
Printed/Typed Name	Signature	Month Day Year

Please pay from this document,
it is our only invoice.

SAMSON OIL

594 MAY STREET
N. ATTLEBORO, MA 02760
(617) 761-6315

MA 0075693572

Date 10/2/84
Pickup At Baker's Auto
City & State Pawtucket, R.I.
Driver Sam Battaglia
Truck No. 3
Gallons Received 300 @ \$2.04
Received From T. G. P. Co. per gal
E. H. H. 11/2/84

Date P.O. # 7-1703R
Delivered To
City & State Amount
Driver Payable
Truck No. \$60.00
Gallons Received
Received by E. H. H.

No 1105

0631-0053

TA00046

75 Davis Street, Providence, RI 02908

A. Name Of Generator Tehaar Apex Co B. Contact Person Edwin C. Sherman
 C. Address 505 Central Ave City Pine E. State RI Tel. No. 252-2226
 G. Name Of Waste Drain Oil H. I.D. No. N/A
 I. Amount 100 gal J. Type(s) HA K. If Corrosive N/A
 L. Date Material Was Declared A Waste 11/20/81
 M. Generic Name Of Major Hazardous Waste Components motor oil lead
 N. Composition motor oil
 O. Transporter And Facility Samsco Oil Service
 P. Pick-up Date 11/20/81 Q. Number and Types Of Containers 1 tank
 R. Waste Analysis Performed By None
 I. Edwin C. Sherman as the authorized agent of the above-mentioned hazardous
 S. waste generator declare that the information in this section of this manifest is true and correct.
 T. Signature Edwin C. Sherman Date 11/20/81

A. Type Of Facility ☐ Incinerator ☐ Storage/Transfer ☐ Land Disposal ☐ Treatment

B. Name Of Operator _____ C. Contact Person _____

D. Address _____ E. City _____ F. State _____

G. Tel. No. _____ H. Date Accepted _____ I. Do labels contain the required information? _____

J. Number And Types Of Containers Received _____

K. I, _____, as the authorized agent for the above-mentioned hazardous waste management facility operator declare that the information in this section of this manifest is true and correct.

L. Signature _____ Date _____

NOTE: CALL (401) 271-2797 or 271-2808 FOR INFORMATION CONCERNING THIS MANIFEST

FOR DEPARTMENT USE ONLY

Date Received

0631-0055

Manifest No. 07047

Copy C - Generator's Copy

TA00048

SAMSON OIL

594 MAY STREET
N. ATTLEBORO, MA 02760
(617) 761-6315

Date 2/20/86
Pickup At Hingham, MA
City & State Hingham, MA
Driver Frank J. Battaglia
Truck No. 3
Gallons Received 20
Received From Tekac: Apex Co.
..... William L. 2/26/86

Date
Delivered To
City & State
Driver
Truck No.
Gallons Received
Received By

Nº 633

0631-0056

TA00049

STRAIGHT BILL OF LADING — SHORT FORM — ORIGINAL — NOT NEGOTIABLE

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

[illegible]

From **TEKNOR APEX COMPANY** ☒ Pawtucket, RI ☐ Brownsville, TN ☐ Attleboro, MA

At 1 Mexico City 1986 BY TRUCK ☐ FREIGHT ☐ Shipper's No. _____

Carrier Henson OK Agent's No. _____

Consigned to 11

Destination N. Orleans Mass State of _____ County of _____

Route Fr. St. 140

Delivering Carrier Western Milk Co. Vehicle or Car Initial No.

[illegible]

The three boxes used for this shipment conform to the specifications set forth in the last maker's certificate thereon, and all other requirements of Rule 47, of the Consolidated Freight Classification.

to verify that the above named articles are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the regulations of the Department of Transportation.

When moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Q7E—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed

no agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

THE SHIPMENT IS CORRECTLY DESCRIBED.

→ **what what is correctly described.**

"This is to certify that the plants named hereinafter 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." NOTE: Prepared certificates complying with 49 CFR 173.430 (a) in effect on June 30, 1976, may be used through June 30, 1978.

CORRECT WEIGHT is _____ **lbs.**

Per _____ Shipper _____

EKNOR APEX COMPANY

Charges Advanced:

15

C. O. D. SHIPMENT

C O. D. 2011

1. **Customer Name**

0631-0057

TA00050



STATE OF RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

recurred
10/6/86

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404 Exp-res 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. RI0045367968		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but may be required by state law.			
3. Generator's Name and Mailing Address TEKNOR APEX CO. 505 CENTRAL AVE. DART. RI 02861						A. State Manifest Document Number RI A 0009252					
4. Generator's Phone (401) 725-8000						B. State Generator's ID RI0045367968					
5. Transporter 1 Company Name SAMSON OIL						C. State Transporter's ID RI0075693572					
6. US EPA ID Number RI0075693572						D. Transporter's Phone 617-7616315					
7. Transporter 2 Company Name N/A						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address MURPHY WASTE OIL WOBURN MASS						G. State Facility's ID MA066588005					
10. US EPA ID Number MA066588005						H. Facility's Phone 617-272-4211					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit	
a. M001 EPA USED DOT 1270 MOTOR OIL						No. Type		Quantity		Waste No.	
b.											
c.											
d.											
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above					
a. USED MOTOR OIL						b.					
c.						d.					
15. Special Handling Instructions and Additional Information											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.											
Printed/Typed Name FL BRADLEY						Signature <i>[Signature]</i>		Date 10/2/86			
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name SAM BATTAGLIA						Signature <i>[Signature]</i>		Date 10/2/86			
18. Transporter 2 Acknowledgement or Receipt of Materials											
Printed/Typed Name						Signature		Date			
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name MURPHY'S WASTE OIL						Signature <i>[Signature]</i>		Date 10/3/86			

Copy 3: Generator Completed Copy-Mailed by TSDF

RI A 0009252

Documentation of All Mendon Avenue Waste Disposal with Manifests

A) "Waste Oil"

1/14/80 McDonald & Watson informed us that from now on they could no longer pick up our waste oil without a manifest. Subsequently we have sold the following 12 bulk loads:

1st	on 3/26/80	by McDonald & Watson	on R.I.	Manifest	02649
2nd	12/19/80	"	"	"	02650
3rd	8/7/81	"	"	"	05766
4th	3/30/82	"	"	"	000996
5th	10/27/82	"	"	"	000997
6th	4/28/83	"	"	"	000998
7th	12/15/83	"	"	"	000999
8th	5/18/84	"	"	"	11538
9th	9/19/84	"	"	"	11541
✓ 10th	4/17/85	"	"	"	0002949
✓ 11th	8/8/85	"	"	"	0002951
12th	1/31/86	by East Bay Waste Oil Co.	on Mass.	Manifest	BO 49977

B) Other than "Waste Oil"

55 drums of ST-P/W On 3/31/84 Solvent Recovery Service of N.E. disposed of a bulk load of MEK & alcohols on R.I. 001000.

7 On 6/19/84 Solvent Recovery Service of N.E. disposed of drums of xylol/butyl alcohol, alcohol sludge, pine tar & waste oil on R.I. 11539.

fixed quote 5/1/84 & trans. of 240 On 6/21/84 Solvent Recovery Service of N.E. disposed of more drums of the same on R.I. 11540.

919 On 10/25/85 R.I. Liquid Waste Disposal took 650 gals. of same on N.Y. 2595078.

SRSS of N.E. = 1079 1/2 ✓ reported on generator biennial hazardous waste report for 1985. 7/29/86 to RI DEM

AO/g + 4 lbs 668 @ = 538 = .78/g 8/18/86 Mac Donald & Watson - pumped 682 gallons (5120 lbs) of leaded gasoline on RI. Manifest RIA - 0002960

.20/g - 10/2/86 Lamson Oil - pumped 300 gallons (approx) of used motor oil on RI Manifest A0009252 (C. Fleeman - garage)

1 sample - 10/7/86 Safety-Kleen Corp. - 45 pounds of waste naptha on Mass. manifest MAC 140136 (C. Fleeman - garage)

- 9/26/86 Transformer Services Inc. - 375 gallons (drums) of waste PCB transformer oil New Hampshire manifest NHB 0009252

(cont.)

0631-0059

TA00052



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Division of Air and Hazardous Materials

75 Davis Street, Providence, RI 02908

(401) 277-2797

Please print or type. (Form designed for use on elcric (12-pitch) typewriter.)

Form Approved OMB No. 2000-0404, Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but may be required by state law.
3. Generator's Name and Mailing Address TEKNOR-APEX CO. 505 CENTRAL AVE. PAWT. RI		RI D045367968		A. State Manifest Document Number RI A 0002951	
4. Generator's Phone (401) 725-8000		5. Transporter 1 Company Name MACDONALD WATSON		B. State Generator's ID SAME	
6. Transporter 1 US EPA ID Number RI D093214360		7. Transporter 2 Company Name		C. State Generator's ID RI D093214360	
8. Transporter 2 US EPA ID Number		9. Designated Facility Name and Site Address NARR. IMP. CO. 223 AILENS AVE. PROV. RI		D. Transporter's Phone 231-2000	
10. US EPA ID Number RI D006807911		E. State Transporter's ID SAME		F. Transporter's Phone 901-331-0054	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit	
a. Waste Oil, NOS Combustible UN 1270		No. 1 Type TT	2065 G	800L	
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
a.		b.			
c.		d.			
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name John J. Meola		Signature <i>John J. Meola</i>		Date 05/08/85	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name Bill Williams		Signature <i>Bill Williams</i>		Date 5/8/85	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Date Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest, except as noted in Item 19.					
Printed/Typed Name KIRKE EVERSON		Signature <i>Kirke Everson</i>		Date 5/8/85	

EPA Form 8700-22 (3-84)

Copy 3: Generator Completed Copy Mailed by TSDF

0631-0060

TA00053

Copy 3: Generator Completed Copy Mailed by TSDF

RI A 0002951



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Division of Air and Hazardous Materials

75 Davis Street, Providence, RI 02908

(401) 277-2797

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but may be required by state law.	
3. Generator's Name and Mailing Address TEKNIKOR-APEX CO. 505 CENTRAL AVE. PLANT 1 NORWICH, CT 06250-8000				A. State Manifest Document Number RI A 0002951		
4. Generator's Phone (401) 725-8000				B. State Generator's ID SAME		
5. Transporter 1 Company Name MIDOT				C. State Transporter's ID RI 2065		
6. Transporter 1 US EPA ID Number KIDOT 527720				D. Transporter's Phone 401-725-8000		
7. Transporter 2 Company Name				E. State Transporter's ID		
8. Transporter 2 US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address NOR. I. W. CO. 225 BAY ST. 1A NORWICH, CT 06250				G. State Facility's ID SAME		
10. Facility US EPA ID Number 15-0006-0011				H. Facility's Phone 401-725-8000		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	
a. WASTE OIL, NOS Combustible UN 1270		1	TT	2065 G	2001	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.						
Printed/Typed Name John J. Meola				Signature John J. Meola Date 5/5/85		
17. Transporter 1 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name Bill Williams				Signature Bill Williams Date 5/5/85		
18. Transporter 2 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name				Signature Date Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name				Signature Date Month Day Year		

EPA Form 8700-22 (3-84)

Copy 8: Generator Copy

0631-0063

TA00054

Copy 8: Generator Copy

RI A 0002951

WEIGHED ON A FAIRBANKS SCALE

CUSTOMER'S NAME

MAC DONALD WASTE OIL

ADDRESS

COMMODITY

USED OIL

CARRIER

93068 MAC DONALD

REMARKS

CONS. NO.

IDENT.

DATE

TIME

454793# 330680 8-08-85 9:35AM 33940 lb

GROSS

454796# 330681 8-08-85 7:50AM 21140 lb

TARE - DRIVER ON

12800

OFF

NET @

PER LB.

PRICE

SHIPPER

T.A. MENDON

WEIGHER

W. J. JONES

9A15 1706

FAIRBANKS SCALE CAT. 083930

SHIP VIA

TRUCK
MAC DONALD WASTE OIL

TERMS

RFC

FREIGHT

C/C

SALESMAN

DESTINATION CODE

PREPAID

COLLECT

F.F.A.

MARCEL

QUANTITY SHIPPED PACKAGES	UNITS	DESCRIPTION	PRODUCT CODE	UNIT PRICE
1	LOAD	USED - OIL		
		GROSS - 33,940		
		" - TARE - 21,140		
		" - NET - 12,800		
1/4	LOAD	USED - OIL		
		GROSS - 21,980		
		" - TARE - 19,260		
		" - NET - 2,720		

SPECIAL INSTRUCTIONS

PAID BY - [Signature]
REC'D BY - [Signature]

AGING

FREIGHT

TAX

OTHER

ORDER NUMBER REFERENCE

DATE PREPARED BY

6-07-105-X8-12/69-15M

WAREHOUSE RELEASE

0631-0065

WATER-PLASTIC	COMPOSITION	Signature of Consignor
DRUMS-BAGS-CARTONS-BULK-PELLETS POWDER-PLASTIC MATERIAL	CARTONS-BLOCKS-RUBBER	If charges are to be made, please specify in writing at time of receipt.
DRUMS-BULK-PLASTICIZER SYNTHETIC	CARTONS-DRUMS-MOTOR OIL	
DRUMS-CARTONS-BULK-CHEMICAL WATER "Antique Value per lb. Special 50c per lb.	CARTONS-DRUMS-ANTIFREEZE	
BAGS-DRUMS-PARTS-HORN DRY-WET		Received \$ _____ to apply in payment of the charges on the property described herein.

TA00056

WEIGHED ON A FAIRBANKS SCALE

DATE

CUSTOMER'S NAME MAC DONALD & WATSON

ADDRESS

COMMODITY USED OIL

CARRIER *3 33068 MAC DONALD

REMARKS

CONS. NO. IDENT. DATE TIME
 4906# 33068 8-08-85 11:30AM 21980 lb
 4798# 33068 8-08-85 11:09AM 19260 lb
2720

GROSS

TARE DRIVER ON

NET @ OFF PER LB.

PRICE

SHIPPER T.A. Mendenhall

WEIGHER W. Kest

FAIRBANKS SCALE CAT. 083930

QUANTITY SHIPPED	DESCRIPTION
PACKAGES	UNITS
1	LOAD - USED - OIL
	GROSS - 33,940
	TARE - 21,140
	NET - 12,800
1/4 LOAD	USED - OIL
	GROSS - 21,980
	TARE - 19,260
	NET - 2,720

SPECIAL INSTRUCTIONS	AGING	FREIGHT	TAX	OTHER
<i>Printed by [Signature]</i>				
<i>Rec'd by [Signature]</i>				
	ORDER NUMBER REFERENCE			DATA PREPARED BY

6-DF-105-XB-12/69-15M

WAREHOUSE RELEASE

0631-0066

WATER-PLASTIC	COMPOSITION	(Signature of Consignor)
DRUMS-BAGS-CARTONS-BULK-PELLETS	CARTONS-BLOCKS RUBBER	If charges are to be passed, write or stamp here: To be paid.
POWDER-PLASTIC MATERIAL	CARTONS-DRUMS-MOTOR OIL	Received \$
DRUMS-BULK-PLASTICIZER	CARTONS-DRUMS-ANTIFREEZE	to apply in payment of the charges on the property described herein.
SYNTHETIC		Agent or Consignee
DRUMS-CARTONS-BULK-CHEMICAL		The signature here shown
DRUMS "Tarpaper" Value not to exceed 50¢ per lb.		valid only the payment is paid.
BAGS-DRUMS-PAINT-NORMAN		
HEAVY-WET		
CARTONS-TREADS-TIRE RUBBER		
CARTONS-KITS-TIRE REPAIR		

TA00057

WEI IED ON A FAIRBANKS SCALE

DATE 8-8-85

CUSTOMER'S NAME MAC DONALD & WATERMAN

ADDRESS _____

COMMODITY USED OIL

CARRIER *3 33068 MAC DONALD

REMARKS _____

CONS. NO. IDENT. DATE TIME
4500# 330680 8-08-85 11:30AM 21980 LB

4798# 330680 8-08-85 11:09AM 19260 LB

2720

GROSS

TARE DRIVER ON

OFF ☒

NET @

PER LB.

PRICE

SHIPPER

T.A. MENDON

WEIGHER

B. HENST

FAIRBANKS SCALE CAT. DB3930

QUANTITY SHIPPED		DESCRIPTION	
PACKAGES	UNITS		
1	LOAD	USED - OIL	
		OUR GROSS - 33,940	
		11 - TARE - 21,140	
		11 - NET - 12,800	
1/4	LOAD	USED - OIL	
		OUR GROSS - 21,980	
		11 - TARE - 19,260	
		11 - NET - 2,720	

SPECIAL INSTRUCTIONS

[Handwritten signatures and notes]

AGING

FREIGHT

TAX

OTHER

ORDER NUMBER REFERENCE

DATA PREPARED BY

6-DR-105-X8-1 2/6 9-15M

WAREHOUSE RELEASE

0631-0067

WATER-PLASTIC	COMPOSITION	(Signature of Customer)
DRUMS-BAGS-CARTONS-BULK-PELLETS	CARTONS-BLOCKS RUBBER	If charges are to be passed, write or stamp here: To be passed.
POWDER-PLASTIC MATERIAL	CARTONS-DRUMS-MOTOR OIL	
DRUMS-BULK-PLASTICIZER	CARTONS-DRUMS-ANTIFREEZE	Received \$
SYNTHETIC		to apply to preparation of the
DRUMS-CARTONS-BULK-CHEMICAL		charges on the invoice attached
WAXES - "Before Value" 80% to 100% per lb.		hereto.
BAGS-DRUMS-PARTS-MORIN		Agent or Cashier
WET-WEI		By
CARTONS-TREADS-TIRE RUBBER		(The signature here indicates
CARTONS-KITS-TIRE REPAIR		only the person named.)

TA00058



TEKNOR APEX COMPANY

BILLING COPY

INVOICE NO. ASSIGNED

RELEASE NUMBER 93027

TELEPHONE 401-725-8000

PAWTUCKET, R. I. 02862

CITY AND STATE SHIPPED FROM

PAWTUCKET - R.I.

WAREHOUSE

SHIPPED FROM ATLANTA 81 MEMPHIS 82 DETROIT 83 SCHILLER PK. 84 WILMINGTON 85 DALLAS 86 WHITTIER 87 MIAMI 88 CAMP HILL 92

SHIP TO

NARRAGANSETTE - IMP-6
PRIV - R.I.

SOLD TO

DANIE

CUSTOMER CODE DATE SHIPPED 7/8/80 CUSTOMER ORDER NUMBER ROUTE F.O.B. POINT

SHIP VIA THEIR TRUCK MCDONALD WATSON TERMS R.F.C. FREIGHT C/C SALESMAN MARCEL DESTINATION CODE

QUANTITY SHIPPED	DESCRIPTION	PRODUCT CODE	UNIT PRICE
PACKAGES	UNITS		
1	LOAD	USED - OIL	
		OUR GROSS - 33,940	
		" - TARE - 21,140	
		" - NET - 12,800	
1/4 LOAD		USED - OIL	
		OUR GROSS - 21,980	
		" - TARE - 19,260	
		" - NET - 2,720	

SPECIAL INSTRUCTIONS: [Signatures] AGING FREIGHT TAX DOWNS ORDER NUMBER REFERENCE DATA PREPARED BY

6-0P-105-XB-12/69-15M

WAREHOUSE RELEASE

0631-0068

WATER-PLASTIC	COMPOSITION	(Signature of Consignor)
DRUMS-BAGS-CARTONS-BULK-PELLETS	CARTONS-BLOCKS RUBBER	If charges are to be prepaid, write or stamp here; "To be prepaid"
POWDER-PLASTIC MATERIAL	CARTONS-DRUMS-MOTOR OIL	Received by to apply in preparation of the charges on the present document below.
DRUMS-BULK-PLASTICIZER SYNTHETIC	CARTONS-DRUMS-ANTIFREEZE	Agent or Consignor (The signature here authorizes only the amount paid.)
DRUMS-CARTONS-BULK-CHEMICAL		Charges Advanced
NUMBER *Reference Value not to Exceed 50c per lb.		
BAGS-DRUMS-PANT NOSH DRY-WET		
CARTONS-TREADS-TIRE RUBBER		
CARTONS-KITS-TIRE REPAIR		

TEKNOR APEX COMPANY, Shipper, Pa

TA00059

**TEKNOR APEX COMPANY**

BILLING COPY

INVOICE NO. ASSIGNED

RELEASE
NUMBER

93027

TELEPHONE 401-725-8000

PAWTUCKET, R. I. 02862

CITY AND STATE SHIPPED FROM

PAWTUCKET - R.I.

WAREHOUSE

SHIPPED
FROMATLANTA
81MEMPHIS
82DETROIT
83SCHILLER PK.
84WILMINGTON
85DALLAS
86WHITTIER
87MIAMI
88CAMP HILL
92SHIP
TONARRAGANSETTE - IMP-6
TRUCK - R.I.SOLD
TO

DANNE

CUSTOMER CODE

DATE SHIPPED

7/8/80

CUSTOMER ORDER NUMBER

ROUTE

F.O.B. POINT

SHIP VIA

THEIR TRUCK
MCDONALD
WATSON

TERMS

R.F.C.

FREIGHT

C/C

SALESMAN

MARCEL

DESTINATION CODE

QUANTITY SHIPPED		DESCRIPTION	PRODUCT CODE				UNIT PRICE
PACKAGES	UNITS						
1	LOAD	USED - OIL					
		OUR GROSS - 33,940					
		" - TARE - 21,140					
		" - NET - 12,800					
1/4	LOAD	USED - OIL					
		OUR GROSS - 21,980					
		" - TARE - 19,260					
		" - NET - 2,720					

SPECIAL INSTRUCTIONS

Shipped by - [Signature]
Rec'd by - [Signature]

AGING

FREIGHT

TAX

OTHER

ORDER NUMBER REFERENCE

DATE PREPARED BY

6-0P-105-XB-1 2/6 P-15M

WAREHOUSE RELEASE

0631-0069

WATER-PLASTIC	COMPOSITION	(Signature of Customer)
DRUMS-BAGS-CARTONS-BULK-PELLETS POWDER-PLASTIC MATERIAL	CARTONS-BLOCKS RUBBER	If charges are to be passed, write or stamp here: "To be Paid."
DRUMS-BULK-PLASTICIZER SYNTHETIC	CARTONS-DRUMS-MOTOR OIL	Received \$ _____ to apply in payment of the charges on the goods de- scribed herein.
DRUMS-CARTONS-BULK-CHEMICAL WOMEN "Include Value not to Exceed \$500 per Dr.	CARTONS-DRUMS-ANTIFREEZE	Approved by Cashier Per _____ (The signature here author- izes only the amount ap- plied.)
BAGS-DRUMS-PAINT NOMIN DRY-WET		Change Address
CARTONS TREADS-TIRE RUBBER		
CARTONS-KITS-TIRE REPAIR		

TEKNOR APEX COMPANY Shipper, Inc.

TA00060



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Division of Air and Hazardous Materials

75 Davis Street, Providence, RI 02908

(401) 277-2797

Please print or type. (Form designed for use on 11x17 (12-pitch) typewriter.)

Form Approved, OMB No. 2000-0404, Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. RI D045367968	Manifest Document No. 0001	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but may be required by state law.
3. Generator's Name and Mailing Address TER NOR APEX CO 505 CENTRAL AVE PAWTUCKET RI				A. State Manifest Document Number RI A 0002949	
4. Generator's Phone (401) 725-8000 RI D045367968				B. State Generator ID STATE	
5. Transporter 1 Company Name MAC DONALD WATSON				C. State Transporter ID RI 32068	
6. US EPA ID Number RI D093214260				D. Transporter's Phone 855-2800	
7. Transporter 2 Company Name				E. State Transporter ID	
8. US EPA ID Number				F. Transporter's Phone	
9. Designated Facility Name and Site Address NARRIMAN CO 223 ALLEN AVE PROVIDENCE RI				G. State Facility ID RI A 0006807911	
10. US EPA ID Number				H. Facility's Phone 401-831-0057	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. WASTE OIL NOS COMBUSTABLE UN 1270		1	TT 319.7	G	D001
b.			@ .15		
c.					
d.					
J. Additional Descriptions for Materials Listed Above <i>This is the 10th time this has been done. 2nd of the 10th time. This is the 1st on this new manifest form.</i>				K. Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name JOHN W. POTTER		Signature John W. Potter		Date 4/17/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Bill Williams		Signature Bill Williams	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Date	

EPA Form 8700-22 (3-84)

Copy 8: Generator Copy

0631-0070

TA00061

Copy 8: Generator Copy

RI A 0002949



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2000-0404, Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but may be required by state law.	
3. Generator's Name and Mailing Address: TER NOR APEX CO 505 CENTRAL AVE PAWTUCKET RI				A. State Manifest Document Number: RI A 0002949		
4. Generator's Phone: (401) 725-8000 RI D045367968				B. State Generator's ID: SAME		
5. Transporter 1 Company Name: MAC DONALD & WATSON				C. State Transporter's ID: RI 33068		
6. US EPA ID Number: RI D093214260				D. Transporter's Phone: 401-2800		
7. Transporter 2 Company Name:				E. State Transporter's ID:		
8. US EPA ID Number:				F. Transporter's Phone:		
9. Designated Facility Name and Site Address: MARK FM P 00 223 ALIENS AVE PROV RI				G. State Facility's ID: SAME		
10. US EPA ID Number: RI D006807911				H. Facility's Phone: 401-331-0057		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number): a. WASTE OIL M.O.S COMBUSTABLE UN 1270		12. Containers: No. Type		13. Total Quantity: 3197 G	14. Unit: G	15. Waste No.: D001
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above: <i>This is the 100 lbs. Dry Ice Tank container 2nd after storage quality control 1st on this new manifest form</i>				K. Handling Codes for Wastes Listed Above:		
15. Special Handling Instructions and Additional Information:						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.						
Printed/Typed Name: JOHN W. POTER				Signature: <i>John W. Potter</i>		Date: 4/17/85
17. Transporter 1 Acknowledgement of Receipt of Materials:						
Printed/Typed Name: BILL WILLIAMS				Signature: <i>Bill Williams</i>		Date: 4/17/85
18. Transporter 2 Acknowledgement of Receipt of Materials:						
Printed/Typed Name:				Signature:		Date:
19. Discrepancy Indication Space:						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest, except as noted in item 19.						
Printed/Typed Name:				Signature:		Date:

EPA Form 8700-22 (3-84)

Copy 8: Generator Copy

0631-0071

TA00062

Copy 8: Generator Copy

RI A 0002949

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11542

MANIFEST NUMBER 11

NAME GENERATOR <i>Tekna Apr 6</i>	MAILING ADDRESS <i>505 Central Ave Pawt. R.I. 02862</i>	PHONE NUMBER <i>(401) 725-8000</i>	STATE/E.P.A. I.D. NO. <i>RI D 045367968</i>
PRIMARY TRANSPORTER <i>MacDonald Waste Oil Co.</i>	<i>Pole 18 Pleasant Rd. New Britain, R.I. 02857</i>	<i>(") 233-2800</i>	<i>RI D 093314260</i>
CONTINUING TRANSPORTER		()	
HAZARDOUS WASTE FACILITY <i>Thompson Bros Apr 6</i>	<i>223 Albion Ave Pawt. R.I.</i>	<i>(") 331-7420</i>	<i>RI D 006807971</i>

GENERATOR CONTACT PERSON <i>John R. Potter</i>		DATE SHIPPED MONTH DAY YEAR		EXPECTED ARRIVAL MONTH DAY YEAR	
U.S. D.O.T. SHIPPING NAME <i>Waste Oil NOS</i>	D.O.T. HAZARD CLASS <i>Combustible liquid</i>	U.N./N.A. NO. <i>NA 1270</i>	WT./VOL. 	UNITS <i>gal</i>	UNIT CODE <i>G</i>
CONTAINER NO. <i>601</i> TYPE <i>TR</i>		E.P.A. WASTE NO. <i>D 045367968</i>	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S. <i>Oil - used Wastes %?</i>		

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797/24 HOUR — (401) 277-2204

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION AND EMERGENCY RESPONSE INFORMATION:

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

REQUIRED LABELS ☐ YES ☐ 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.	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 YEAR
PLACARDS REQ'D ☐	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 YEAR

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

SIL IF

MONTH DAY YEAR

HANDLING METHOD

1. 4.
2. 5.
3.

0631-0072

GENERATOR COMPLETES

TRANSPORTER COMPLETES

H.W.F. COMPLETES

TA000063

FBI BATHING INFORMATION

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.

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11542

MANIFEST NUMBER: 11

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR <i>Teknor Apr 6</i>	<i>505 Central Ave Pawt. R.I. 02862</i>	<i>(401) 725-8000</i>	<i>RI D045367968</i>
PRIMARY TRANSPORTER <i>MacDonald Waste Oil Co</i>	<i>Pole 18 Pawtucket Rd. Pawtucket, R.I. 02857</i>	<i>(") 233-2800</i>	<i>RI D093214260</i>
CONTINUING TRANSPORTER		()	
HAZARDOUS WASTE FACILITY <i>Wilmington Apr 6</i>	<i>223 Albion Ave Providence, R.I.</i>	<i>(") 331-7420</i>	<i>RI D006807911</i>
GENERATOR CONTACT PERSON <i>John R. Potter</i>	DATE SHIPPED	MONTH	DAY
	EXPECTED ARRIVAL	MONTH	DAY

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER NO.	TYPE	E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
<i>Waste Oil NOS</i>	<i>Combustible Liquid</i>	<i>NA 1270</i>		<i>gal</i>	<i>G</i>	<i>001</i>	<i>TR</i>	<i>D001</i>	<i>Oil - Lead Unk %?</i>

FOR INFORMATION CONTACT: RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 OAVIS STREET PROVIDENCE, RI 02908 (401) 277-2724 HOURS - (401) 277-2284	SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION; AND EMERGENCY RESPONSE INFORMATION: <i>for new Form (on A 0002949)</i>

REQUIRED LABELS ☐ YES ☐ 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.	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 YEAR
PLACARDS READ	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 YEAR

INDICATE ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT AND LIST REJECTED MATERIALS, INDICATE DISPOSITION OF REJECTED SHIPMENT.	HANDLING METHOD
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.	
SIG. IF	MONTH DAY YEAR

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

TA00064

0631-0073



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. RI D045367968	Manifest Document No. 00001	2. Page 1 of	Information in the shaded areas is not required by Federal law, but may be required by state law.
3. Generator's Name and Mailing Address TEKNOR APEX CO 505 CENTRAL AVE PROVIDENCE RI 02908				A. State Manifest Document Number RI A 0002949	B. State Generator's ID SAME C. State Transporter's ID RI 093214260 D. Transporter's Phone 401-830-0000 E. State Transporter's ID SAME F. Transporter's Phone 401-331-0051 G. State Facility's ID SAME H. Facility's Phone 401-331-0051
4. Generator's Phone 401-725-8000		6. US EPA ID Number RI D045367968		B. State Generator's ID	
5. Transporter 1 Company Name MAC DONALD & LUTSON		8. US EPA ID Number RI D093214260		C. State Transporter's ID	
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone	
9. Designated Facility Name and Site Address NARR IMP CO 223 HILFENS AVE PROVIDENCE RI		12. Containers No. Type 1 TT 3197 G		E. State Transporter's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) WASTE NO. 5 COMBUSTIBLE UN 1270		13. Total Quantity 3197 G		F. Transporter's Phone	
J. Additional Descriptions for Materials Listed Above		14. Unit G		G. State Facility's ID	
K. Handling Codes for Wastes Listed Above		15. Special Handling Instructions and Additional Information		H. Facility's Phone	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name JOHN W. POTTER				Signature John W. Potter	Date 4/17/85
17. Transporter 1 Acknowledgement of Receipt of Materials				Date	
Printed/Typed Name BILL WILLIAMS				Signature Bill Williams	Month Day Year 4/17/85
18. Transporter 2 Acknowledgement or Receipt of Materials				Date	
Printed/Typed Name				Signature	Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name KIRKE EVERSON				Signature Kirke Everson	Date 4/17/85

EPA Form 8700-22 (3-84)

Copy 3: Generator Completed Copy-Mailed by TSDF

0631-0074

TA00065

Copy 3: Generator Completed Copy-Mailed by TSDF

RI A 0002949



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Division of Air and Hazardous Materials

75 Davis Street, Providence, RI 02908

(401) 277-2797

Please print or type. (Form designed for use on eline (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. RI D045367968	Manifest Document No. 80001	2. Page 1 of	Information in the shaded areas is not required by Federal law, but may be required by state law.
3. Generator's Name and Mailing Address TEKNO APEX CO 505 CENTRAL AVE PROV RI				A. State Manifest Document Number RI A 0002949	
4. Generator's Phone (401) 725-8000				B. State Generator's ID SAME	
5. Transporter 1 Company Name MAC DONALD & WATSON				C. State Transporter's ID RI 18066	
6. US EPA ID Number RI D093214260				D. Transporter's Phone 401-830-0300	
7. Transporter 2 Company Name				E. State Transporter's ID	
8. US EPA ID Number				F. Transporter's Phone	
9. Designated Facility Name and Site Address NAPE Imp Co 223 AILENS AVE PROV RI				G. State Facility's ID SAME	
10. US EPA ID Number RI D006807911				H. Facility's Phone 401-331-0051	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. WASTE OIL N.O.S COMBUSTIBLE UN 1270		No. 1	Type TT	3197 G	D001
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name JOHN W. POTTER		Signature John W. Potter		Date 4/17/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Bill Williams		Date 4/17/85	
Printed/Typed Name BILL WILLIAMS		Signature		Date	
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name KIRKE EVERSON		Signature Kirke Everson		Date 4/17/85	

EPA Form 8700-22 (3-84)

Copy 3: Generator Completed Copy-Mailed by TSDF

0631-0075

TA00066

Copy 3: Generator Completed Copy-Mailed by TSDF

RI A 0002949

Pole #18 Peep Toad Road
NORTH SCITUATE, RHODE ISLAND 02857
(401) 232-2800

Pole #18 Peep Toad Road

NORTH SCITUATE RHODE ISLAND 02857

(401) 232-2800

SOLD BY	DATE
Tony	9-19-84
NAME	
TECKNOR Apex	
ADDRESS	
905 CENTRAL AVE	
CITY	
PROVIDENCE RI	

[illegible]

No.

7260

Thank You

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME _____

ADDRESS _____

COMMODITY _____

CARRIER _____

REMARKS _____

CONS. NO. IDENT. DATE TIME 2516016

GROSS

513513# 330055 9-19-84 12155PM 1868016

TARE - DRIVER ON

OFF

NET @ _____ PER LB.

PRICE _____

SHIPPER _____

GHER _____

FAIRBANKS SCALE CAT. 083930

TA00068

0631-0077

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME TAM

ADDRESS _____

COMMODITY WASTE OIL

CARRIER MAC & WATSON

REMARKS _____

CONS. NO. IDENT. DATE TIME 3260016

413000* 330000 9-19-84 912000 1850016

GROSS

TARE DRIVER ON _____

OFF _____

NET @ _____ PER LB.

PRICE _____

SHIPPER MAC & WATSON

GHER _____

FAIRBANKS SCALE CAT. 083930

13820 / 135
18 42 gals

TA00069

0631-0078

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11541
MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR		(401) 733-0000	
PRIMARY TRANSPORTER		(401) 233-0000	
CONTINUING TRANSPORTER		()	
HAZARDOUS WASTE FACILITY		(401) 233-0000	

GENERATOR CONTACT PERSON	DATE SHIPPED	MONTH	DAY	YEAR	EXPECTED ARRIVAL DATE
		09	19	89	

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
						NO.	TYPE		
1			2842	gal			TA		
2									
3									
4									
5									
6									

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797; 24 HOUR — (401) 277-2284

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION; AND EMERGENCY RESPONSE INFORMATION:

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

TRANSPORTER COMPLETES	REQUIRED LABELS ☒ YES ☐ 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.	SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR 09 19 89	STATE	COMPANY NO. FOR TRAILER
	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	COMPANY NO. FOR TRAILER

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.

NATURE

7 GENERATOR COPY

MONTH DAY YEAR
DATE

0631-0079

TA000070

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11541
MANIFEST NUMBER

GENERATOR		MAILING ADDRESS		PHONE NUMBER		STATE/PA I.D. NO.	
NAME John W. Poth		505 Central Ave Provt. R.I. 02862		(401) 725-8000		RI D 09453679168	
PRIMARY TRANSPORTER McDonald Waste Management Co		886 18 Popponesset Rd. Provt. R.I. 02857		(401) 233-2800		RI D 094321192610	
CONTINUING TRANSPORTER							
HAZARDOUS WASTE FACILITY Management Services Co		223 Adams Ave Provt. R.I.		(401) 331-7420		RI D 09683079111	
GENERATOR CONTACT PERSON John W. Poth		DATE SHIPPED 10/15/84		MONTH OCT		YEAR 1984	
U.S. D.O.T. SHIPPING NAME		D.O.T. HAZARD CLASS		U.N./N.A. NO.		WT./VOL.	
1. Used Oil NOS		Combustible		NA		1270 gal	
2. Used Oil NOS		Combustible		NA		1270 gal	
3. Used Oil NOS		Combustible		NA		1270 gal	
4. Used Oil NOS		Combustible		NA		1270 gal	
5. Used Oil NOS		Combustible		NA		1270 gal	
6. Used Oil NOS		Combustible		NA		1270 gal	
FOR INFORMATION CONTACT: RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 DAVIS STREET PROVIDENCE, RI 02908 (401) 277-2191/24 HOURS — (401) 277-2281		SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION AND EMERGENCY RESPONSE INFORMATION					
REQUIRED LABELS YES ☒ NO ☐		SIGNATURE OF TRANSPORTER [Signature]					
PLACARDS YES ☒ NO ☐		INDICATE ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT AND LISTED BELOW					
CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, 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.		GENERATOR SIGNATURE [Signature]					
DATE 10/15/84		GENERATOR'S EMERGENCY PHONE [Number]					

TA00071

RI 11541

MANIFEST NUMBER

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.

IN THE EVENT OF A SPILL CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

DATE OF DELIVERY		
MONTH	DAY	YEAR
09	19	54

DATE OF DELIVERY
MONTH DAY YEAR

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 CORRECT TO THE BEST OF MY KNOWLEDGE.

First Edition 1900

9 MONTH 19 DAY DATE 84 YEAR

Handing Method

So2	101
T18	101
T40	0631-00

0631-0081

GENERALIST'S EMERGENCY PHONE

TA00072



CUSTOM DISTILLATIONS
FOR INDUSTRY

S R S, INC.
1200 SYLVAN STREET
LINDEN, NEW JERSEY 07036
(201) 862-2000

6/30/84	124

R E M I T T O	S.R.S. OF NEW ENGLAND
	1200 SYLVAN STREET
	LINDEN, NJ 07036

TEKNOF AFEX COMPANY

505 CENTRAL AVENUE
PANTUCKET RI 02861

40780	24	8852	HOME DISTILLER	NET 15 DAYS
6/21/84		EPS		

23.00	EA DISPOSAL DRUMS	✓ 45.0000	1035.00
1.00	EA DISPOSAL DRUMS	✓ 35.0000	35.00
1.00	EA TRANSPORTATION P.U.	✓ 240.0000	240.00
.25	EA TRANS DETENTION P.U.	✓ 25.0000	6.25

**PLEASE PAY THIS AMOUNT **

1316.25

FIN # 8359 8929DD
FIN # 8359 8928FD
COPY OF DETENTION ENCLOSED

5A83

*OK to pay
John W. Porter*

PLANT LOCATIONS:

SOLVENTS RECOVERY SERVICE
OF NEW JERSEY, INC.
1200 SYLVAN STREET
LINDEN, N.J. 07036

SOLVENTS RECOVERY SERVICE
OF NEW ENGLAND, INC.
LAZY LANE
SOUTHINGTON, CONN. 06489

0631-0082

TA00073



S R S, INC.
1200 SYLVAN STREET
LINDEN, NEW JERSEY 07036
(201) 862-2000

100	100
100	100

REMIT TO
NEW YORK NEW YORK
100 WALL STREET
FLOOR 10 OFFICE

7E1007 47E: 0104-1

SECRET
EXCLUDED FROM AUTOMATIC DOWNGRADING AND DECLASSIFICATION

[illegible]

PLANT LOCATIONS:

**SOLVENTS RECOVERY SERVICE
OF NEW JERSEY, INC.
1200 SYLVAN STREET
LINDEN N.J. 07036**

**SOLVENTS RECOVERY SERVICE
OF NEW ENGLAND, INC.
LAZY LANE
SOUTHINGTON, CONN. 06489**

0631-0083

TA00074

HAZARDOUS WASTE MANIFEST

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11539

MANIFEST NUMBER

TA00075

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR TEKNOA APEX CO	505 CENTRAL AV. PAWT. R.I.	(401) 725-8000	
PRIMARY TRANSPORTER SOLVENT RECOVERY SERV. OF N.E.	PO BOX 362 LAZY LANE SOUTHWINGTON CONN. 06489	(203) 628-8084	
CONTINUING TRANSPORTER			
HAZARDOUS WASTE FACILITY SOLVENT RECOV. SERVICE OF N.E.	PO BOX 362 LAZY LANE SOUTHWINGTON CONN 06489	(203) 628-8084	

GENERATOR CONTACT PERSON JOHN W. POTTER	DATE SHIPPED MONTH 06 DAY 17 YEAR 84	EXPECTED DATE MONTH 06 DAY 17 YEAR 84

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER NO.	TYPE	E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
1. WASTE, FLAMMABLE LIQUID NOS	FLAMMABLE LIQUID	UN 1993	1.00	GAL	G	2	DR	D001	XYLIL/BUTYL ALCOHOL
2. WASTE FLAMMABLE SOLID NOS	FLAMMABLE SOLID	UN 325	1.00	GAL	G	2	DR	D001	ALCOHOL SLUDGE
3. WASTE FLAMMABLE SOLID NOS	FLAMMABLE SOLID	UN 325	50.0	LBS	P	1	DR	D001	PINE TAR
4. WASTE OIL	COMBUSTIBLE LIQUID	UN 1270	37.50	GAL	G	75	DR	D001	
5.									
6.									

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797/24 HOUR -- (401) 277-2284

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION, AND EMERGENCY RESPONSE INFORMATION:
1. PIN 8359-6928-ED
2. PIN 8359-6927-DD
3. PIN 8359-6926-GD
4. PIN 8359-6929-DD
IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

REQUIRED LABELS
☒ YES ☐ 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.

SIGNATURE OF TRANSPORTER
Donald D. Potter

DATE SHIPMENT ACCEPTED:

MONTH **06** DAY **17** YEAR **84**

PLACARDS REQUIRED
☒ YES ☐ NO
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 **06** DAY **17** YEAR **84**

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

0631-0084



SHIPPING ORDER

SOLVENTS RECOVERY SERVICE OF NEW ENGLAND, INC.

LAZY LANE • SOUTHTON, CONN. 06488 PHONE 203-628-8084

FROM:

Teknor Apex
505 Central Ave
Pawtucket, RI

Customer #

DRUMS / John Potter 401-725-8000

DATE 6/11 SRS NO. CUST. NO. TRACTOR TRAILER

Humphrey LaTourneau

COMPT.	INCHES	SKIDS	PRODUCT	TOTAL WEIGHTS	PLANT ORDER
1		7	Pinetar solids PIN# 8359-6926-GD	GROSS	# Sp.Gr.
2		2	Alcohol Sudge PIN# 8359-6928-DP		# Sp.Gr.
3		2	Butyl Alcohol/Xylol PIN# 8359-6928-FD	NET	# Sp.Gr.
		2	Machine & Process Oil PIN# 8359-6929-DP		# Sp.Gr.

SPECIAL INSTRUCTIONS

VACUUM TRUCK AT CUSTOMER REQUEST ☐

☒ FLAMMABLE-RED LABEL

TIME START FINISH

☐ NON-FLAMMABLE

OTHER COMMENTS:

DELAY	TIME IN	TIME OUT	HOURS	FREE	EXCESS	RATE	BILL TO CUSTOMER
LOAD	9:30 AM	11:00 AM					
UNLOAD							

REASON FOR DELAY

PUMPING FROM DRUMS ☒

PUMPING INTO DRUMS ☒

OTHER EXPLAIN ☒

Verified By

Received The Above Described Property In Good Condition Except As Noted

SRS Shipper Or Receiver

FIRM

BY

SRS Driver

Driver

TA00076

0631-0085

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11540

MANIFEST NUMBER

NAME		MAILING ADDRESS		PHONE NUMBER		STATE/E.P.A. I.D. NO.	
GENERATOR <i>Teknor Apex Co</i>		<i>505 Central Ave Pawt. R.I.</i>		<i>(401) 725-8000</i>		<i>RI 11540</i>	
PRIMARY TRANSPORTER <i>Solvent Recovery Inc. of N.E.</i>		<i>P.O. Box 362 Sagadahoc, Southington, Conn. 06489</i>		<i>(203) 628-8084</i>		<i>CT 11540</i>	
CONTINUING TRANSPORTER							
HAZARDOUS WASTE FACILITY <i>Solvent Recovery Inc. of N.E.</i>		<i>P.O. Box 362 Sagadahoc, Southington, Conn. 06489</i>		<i>(203) 628-8084</i>		<i>CT 11540</i>	
GENERATOR CONTACT PERSON <i>John W. Potter</i>		DATE SHIPPED		MONTH	DAY	YEAR	EXPECTED ARRIVAL DATE
				<i>06</i>	<i>21</i>	<i>84</i>	
U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER NO. TYPE	E.P.A. WASTE NO. DESCRIPTION OR WASTE ANALYSIS IF WASTE IS H.O.S.
1. <i>Waste Oil</i>	<i>Combustible Liquid</i>	<i>1270</i>	<i>1150</i>	<i>GAL</i>	<i>G</i>	<i>23 DR</i>	<i>23-1</i>
2. <i>Waste, Flammable Liquid</i>	<i>Flammable Liquid</i>	<i>HA-193</i>	<i>50</i>	<i>GAL</i>	<i>G</i>	<i>1 DR</i>	<i>23-1</i>
3.							
4.							
5.							
6.							
FOR INFORMATION CONTACT: RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 DAVIS STREET PROVIDENCE, RI 02908 (401) 277-2797/24 HOUR -- (401) 277-2284		SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION; AND EMERGENCY RESPONSE INFORMATION: <i>1. PIN B359-6929 DD</i> <i>2. PIN-9359-6928-FD</i>					
IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802							

THIS IS TO CERTIFY THAT THE WASTE(S) WAS DELIVERED BY THE AFOREMENTIONED DELIVERING TRANSPORTER AND THAT THE INFORMATION ON THIS MANIFEST IS CORRECT TO THE BEST OF MY KNOWLEDGE.

GENERATOR'S SIGNATURE

DATE

TRANSPORTER COMPLETES	REQUIRED LABELS ☒ YES ☐ 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.	SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR <i>06 21 84</i>	STATE <i>RI</i>	COMPANY NO. FOR TRAILER <i>11540</i>	DATE OF DELIVERY MONTH DAY YEAR <i>06 21 84</i>
	PLACARDS REQ'D <i>Planned</i>	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 <i>06 21 84</i>	STATE <i>RI</i>	COMPANY NO. FOR TRAILER <i>11540</i>	DATE OF DELIVERY MONTH DAY YEAR <i>06 21 84</i>

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.

SIGNATURE

DATE
MONTH DAY YEAR
06 21 84

0631-0086

TA00077

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11540

MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR	1111 T.I.	(401) 225-0000	RI 11540
PRIMARY TRANSPORTER	1111 T.I.	(401) 225-0000	RI 11540
CONTINUING TRANSPORTER		()	
HAZARDOUS WASTE FACILITY		()	

GENERATOR CONTACT PERSON				DATE SHIPPED		MONTH	DAY	YEAR	EXPECTED ARRIVAL DATE
U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER NO. TYPE		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
1									
2									
3									
4									
5									
6									

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797/24 HOUR --- (401) 277-2204

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION; AND EMERGENCY RESPONSE INFORMATION:

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

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.

GENERATOR'S SIGNATURE

TA000078

TRANSPORTER COMPLETES		DATE SHIPMENT ACCEPTED		STATE		COMPANY NO. FOR TRAILER		DATE OF DELIVERY			
REQUIRED LABELS	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.	MONTH	DAY	YEAR	VEHICLE	VEHICLE	VEHICLE	MONTH	DAY	YEAR	
☒ YES ☐ NO	SIGNATURE OF TRANSPORTER	4	6	89	RI	VEHICLE	VEHICLE	VEHICLE	4	6	89
PLACARDS READ	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.	MONTH	DAY	YEAR	VEHICLE	VEHICLE	VEHICLE	MONTH	DAY	YEAR	
1	SIGNATURE OF TRANSPORTER	4	6	89	RI	VEHICLE	VEHICLE	VEHICLE	4	6	89

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.

SIGN.

MONTH DAY YEAR

0631-0087



SHIPPING ORDER

SOLVENTS RECOVERY SERVICE OF NEW ENGLAND, INC.

LAZY LANE • SOUTHTON, CONN. 06489 PHONE 203-626-8084

FROM TOX

Teknor Apex
505 Central Ave
Pawtucket, RI

Customer #

DRUMS / Johnn Potter 401-725-8000

DATE 6/24	SRS NO.	CUST. NO.	TRACTOR	TRAILER
			12731	9-3

COMPT.	INCHES	GALLONS	PRODUCT	TOTAL WEIGHTS	PLANT ORDER
1		53	Machine & Processing Oil PIN#	GROSS 8359-6929-DD	# Sp.Gr.
2		1	Flammable Liquid	TARE	# Sp.Gr.
3			PIN# 8359-6928-17		# Sp.Gr.

SPECIAL INSTRUCTIONS

VACUUM TRUCK AT CUSTOMER REQUEST ☐

☒ FLAMMABLE-RED LABEL

TIME - START

FINISH

☐ NON-FLAMMABLE

OTHER COMMENTS:

DELAY	TIME IN	TIME OUT	HOURS	FREE	EXCESS	RATE	BILL TO CUSTOMER
LOAD	1109	1227					
UNLOAD							

REASON FOR DELAY

PUMPING FROM DRUMS ☐

PUMPING INTO DRUMS ☐

OTHER EXPLAIN ☐

Verified By

Received The Above Described Property In Good Condition Except As Noted

SRS Shipper Or Receiver

SRS Driver

FIRM

BY

TA00079

0631-0088

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11540

MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR <i>Teknor Appt Co</i>	<i>505 Central Ave Pawt. R.I.</i>	<i>(401) 725-8000</i>	<i>RI D029153271743</i>
PRIMARY TRANSPORTER <i>Silver Recovery Inc. of N.E.</i>	<i>P.O. Box 362 06489</i>	<i>(203) 628-8084</i>	<i>CT D0009111715071</i>
CONTINUING TRANSPORTER	<i>Logg Lane Southington, Conn.</i>	<i>()</i>	
HAZARDOUS WASTE FACILITY <i>Silver Recovery Inc. of N.E.</i>	<i>P.O. Box 362 06489</i>	<i>(203) 628-8084</i>	<i>CT D0009111715071</i>

GENERATOR CONTACT PERSON <i>John W. Potter</i>	DATE SHIPPED	MONTH	DAY	YEAR	EXPECTED ARRIVAL DATE

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER NO.	TYPE	E.P.A. WASTE NO.	DESCRIPTION OF WASTE ANALYSIS IF WASTE IS N.O.S.
1. <i>Waste Oil</i>	<i>Combustible Liquid</i>	<i>NA 1270</i>	<i>55 GAL</i>	<i>6 AL</i>	<i>G</i>	<i>200</i>	<i>200</i>	<i>200</i>	
2.									
3.									
4.									
5.									
6.									

FOR INFORMATION CONTACT: RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 DAVIS STREET PROVIDENCE, RI 02908 (401) 277-2797/24 HOUR — (401) 277-2284	SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION AND EMERGENCY RESPONSE INFORMATION: <i>1. PIN 8359-6929 22</i> <i>Photo of Alkaline John Mails 6-19-89</i> <i>Di Huang To meet with him from 11-5-89</i>

REQUIRED LABELS ☐ YES ☐ 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.	SIGNATURE OF TRANSPORTER
PLACARDS REQUIRED ☐ YES ☐ NO	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

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.

SIGNATURE

MONTH DAY YEAR

0631-0089

GENERATOR COMPLETES

TRANSPORTER COMPLETES

H.W.F. COMPLETES

TA00080

DATE GENERATOR'S EMERGENCY PHONE

GENERATOR SIGNATURE

I CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, 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.

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11539
MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR TEKNOX APEX CO	505 CENTRAL AV. PRUIT. R.I.	(401) 725-8000	RI-P-011536749038
PRIMARY TRANSPORTER SOLVENT RECOVERY SERV. OF N.E.	PO BOX 362 LAZY LAKE SOUTHWINGTON CONN. 06489	(203) 628-8084	CT-P-0097111501
CONTINUING TRANSPORTER		()	
HAZARDOUS WASTE FACILITY SOLVENT RECOV. SERVICE OF N.E.	PO BOX 362 LAZY LAKE SOUTHWINGTON CONN 06489	(203) 628-8084	CT-P-0097111501

GENERATOR CONTACT PERSON

JOHN W. POTTER

DATE SHIPPED

MONTH

DAY

YEAR

EXPIRATION DATE

MONTH

DAY

YEAR

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
						NO.	TYPE		
1. WASTE, FLAMMABLE LIQUID NOS	FLAMMABLE LIQUID	UN 1993	100	GAL	G		DR	D001	XYLOL
2. WASTE FLAMMABLE SOLID NOS	FLAMMABLE SOLID	UN 1325	100	GAL	G		DR	D001	ALCOHOL SLUDGE
3. WASTE FLAMMABLE SOLID NOS	FLAMMABLE SOLID	UN 1325	100	LBS	G		DR	D001	PINE TAR
4. WASTE OIL	COMBUSTIBLE LIQUID	NA 1270	100	GAL	G		DR	D001	
5.									
6.									

FOR INFORMATION CONTACT:

RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797/24 HOUR — (401) 277-2284

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

1. PIN 8359-6929-EP
2. PIN 8359-6929-EP
3. PIN 8359-6929-EP
4. PIN 8359-6929-EP

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-2002

Photo of that given John M. on 6-12-84
for Hump.

REQUIRED LABELS

YES NO

THIS IS TO CERTIFY THAT I AM THE
PRIMARY TRANSPORTER AND HAVE
ACCEPTED THE DESCRIBED SHIP-
MENT IN PROPER CONDITION FOR
TRANSPORT TO THE IDENTIFIED H.W.F.

SIGNATURE OF TRANSPORTER

PLACARDS REQ'D

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

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

This should clean out the yard.

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

MANIFEST CORRECT TO THE BEST OF MY KNOWLEDGE.

0631-0090

GENERATOR COMPLETES

1800081
TRANSPORTER COMPLETES

H.W.F. COMPLETES

GENERATOR'S EMERGENCY PHONE

DATE

GENERATOR SIGNATURE

Made out for me to put on my card by John M. 6-12-81

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI
MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR TEKNOR-APEX CO	505 Central Ave, Pawt. RI	(401) 725-7000	
PRIMARY TRANSPORTER Solvent Recovery Service of N.E.	P.O. Box 362 Lazy Lane, Southington, Conn 06489	(203) 628-8084	CTD 01091717160181
CONTINUING TRANSPORTER			
HAZARDOUS WASTE FACILITY			CTD 01091717160181

GENERATOR CONTACT PERSON JOHN W. POTTER	DATE SHIPPED	MONTH	DAY	YEAR	EXPECTED ARRIVAL	MONTH	DAY	YEAR

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
						NO.	TYPE		
1. Waste, Flammable liquid nos	Flammable liquid	UN 1993	1.00	gals	G	2	DR	D101	Xylo 35.00
2. Waste, Flammable Solids nos	Flammable solid	UN 1325	1.00	gals	G	2	DR	D101	Alcohol Sludge 45.00
3. Waste, Flammable Solids nos	Flammable solid	UN 1325	5.00	lbs	P	1	DR	D101	Pine Tar 62.00
4. Waste oil	combustible liquid	NA 1270	49.00	gals	G	99	DR	D101	45.00
5.									
6.									

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2787/24 HOUR — (401) 277-2284

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION; AND EMERGENCY RESPONSE INFORMATION:
1. PIN 8359-6928-PD
2. PIN 8359-6927-DD
3. PIN 8359-6926-GD
4. PIN 8359-6929-DD

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

REQUIRED LABELS
☐ YES
☐ 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.

SIGNATURE OF TRANSPORTER

PLACARDS READ

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

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

0631-0091

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED BY THE DELIVERING TRANSPORTER AND ARE PROPERLY MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE U.S. ENVIRONMENTAL AGENCY.

GENERATOR SIGNATURE DATE

TRANSPORTER
COMPLETES
TA00082

H.W.F.
COMPLETES



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

P. O. BOX 362
SOUTHINGTON, CONN. 06488

PHONE: (203) 528-8084

TEKNOR - APEX CO.
505 CENTRAL AVENUE
PAWTUCKET, RI 02861
ATT: FRANK NASISI

DISPOSAL QUOTATION

DATE: MAY 24, 1984
Laboratory # 6926, 6928

SRS is pleased to inform you that the data/sample submitted for disposal has been approved. Our environmental review of Federal, State and Local regulations allows us to properly dispose of this waste. Our State permit numbers are as follows: CT DEP #CT-HW-148, NJ DEP #2009C. Our EPA I.D. numbers are as follows: Connecticut, CTD 009 717 604; New Jersey, NJD 002 182 897.

Product identification number (PIN) must appear on all purchase orders, manifest, bills of lading and drums.

<u>PIN</u>	<u>Waste Description</u>	<u>Unit</u>	<u>Disp. Method</u>	<u>Disp. Price</u>	<u>Annual Volume</u>	<u>Shipping Frequency</u>
8359-6926-GD	Flam. Solid NOS (Pinetar)	55/gal/dr.,	Secure Landfill	\$62/dr.	16/dr.	Quarterly
8359-6928-FD	Flam. Liq. NOS (Butyl Alcohol, Xylol, MEK)	" "	Incin.	\$35/dr.	16/dr.	"

<u>TRANSPORTATION:</u>	<u>1-28</u>	<u>29-50</u>	<u>51-65</u>	<u>66-80 & TT</u>
Pickup	\$240.	\$255.	\$280.	\$305.

SRS Transportation Subject To:

- (1) \$25/hr. detention charge - one hour free time
- (2) \$250/pump breakage charge if attributable to customer's waste.
- (3) \$85/hr. vacuum truck rental charge, if requested.

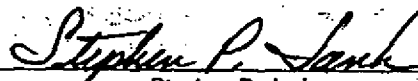
MINIMUM DISPOSAL CHARGE: \$ 150.00 not including transportation

TERMS:
Net 15 days

All shipments must comply with 40 CFR Part 262, Subpart C for disposal and 49 CFR Part 100-177 for transportation.

Price quoted is a trial price based on data/sample submitted. Material not in compliance with the Hazardous Waste Data Sheet and/or sample submitted and beyond the limits of our normal capacity, may be unacceptable or incur additional charges. SRS will always advise of any discrepancy prior to taking action. Prices are firm for 30 days.

SPJ/cct
cc: ET


Stephen P. Jank
Manager, Marketing & Sales

0631-0092

Blue Salesman

Green Salesman

Orange Salesman

Red Salesman

TA00083



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

P. O. BOX 362
SOUTHINGTON, CONN. 06489

PHONE: (203) 628-8084

TEKNOR - APEX CO.
505 CENTRAL AVENUE
PAWTUCKET, RI 02861
ATT: MR. FRANK NASISI

DISPOSAL QUOTATION

DATE: MAY 24, 1984
Laboratory # 6929, 6927

SRS is pleased to inform you that the data/sample submitted for disposal has been approved. Our environmental review of Federal, State and Local regulations allows us to properly dispose of this waste. Our State permit numbers are as follows: CT DEP #CT-HW-148, NJ DEP #2009C. Our EPA I.D. numbers are as follows: Connecticut, CTD 009 717 604; New Jersey, NJD 002 182 897.

Product identification number (PIN) must appear on all purchase orders, manifest, bills of lading and drums.

<u>PIN</u>	<u>Waste Description</u>	<u>Unit</u>	<u>Disp. Method</u>	<u>Disp. Price</u>	<u>Annual Volume</u>	<u>Shipping Frequency</u>
8359-6929-DD	Waste oil (machine & processing oil)	55/gal/dr.	Disperse & Incin.	\$45/dr.	280/dr.	Quarterly
8359-6927-DD	Flam. <u>Liq.</u> NOS (alcohol sludge)	55/gal/dr.	"	\$45/dr.	45/dr.	"

<u>TRANSPORTATION:</u>	<u>1-28</u>	<u>29-50</u>	<u>51-65</u>	<u>66-80 & TT</u>
Pickup	\$240.	\$255.	\$280.	\$305.

SRS Transportation Subject To:

- (1) \$25/hr. detention charge - one hour free time
- (2) \$250/pump breakage charge if attributable to customer's waste.
- (3) \$85/hr. vacuum truck rental charge, if requested.

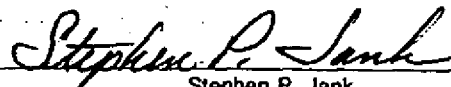
MINIMUM DISPOSAL CHARGE: \$ 200.00 not including transportation

TERMS: Net 15 days

All shipments must comply with 40 CFR Part 262, Subpart C for disposal and 49 CFR Part 100-177 for transportation.

Price quoted is a trial price based on data/sample submitted. Material not in compliance with the Hazardous Waste Data Sheet and/or sample submitted and beyond the limits of our normal capacity, may be unacceptable or incur additional charges. SRS will always advise of any discrepancy prior to taking action. Prices are firm for 30 days.

SPJ/cct
cc: ET


Stephen P. Jank
Manager, Marketing & Sales

0631-0093

Blue-Salesmanager Green-Salesman Green-Announcer Red-Customer File

TA00084

• 941157 NL

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR TEKSON APEX CO	505 Central Ave, Pawtucket, R.I.	(401) 725-1160	
PRIMARY TRANSPORTER	P.O. BOX 362		
SOLVENT RECOVERY SERVICE OF N.E.	LAZY LANE, SOUTHTON, CONN. 06189	(203) 628-8084	CTD 0009727604
CONTINUING TRANSPORTER			
HAZARDOUS WASTE FACILITY			
SOLVENT RECOVERY SERVICE OF N.E.	P.O. BOX 362 - LAZY LANE SOUTHTON, CT 06189	(203) 628-8084	CTD 0009727604
	DATE SHIPPED	MONTH DAY YEAR	EXPECTED ARRIVAL MONTH DAY YEAR

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL. <i>X</i>	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
						NO. <i>X</i>	TYPE		
<i>White Flammable liquid NOS</i>	<i>Flammable Liquid</i>	<i>UN 1993</i>	<i>2000 L</i>	<i>Gals</i>	<i>[6]</i>	<i>[] [X] </i>	<i>DR</i>	<i>D.O.D.I.</i>	<i>Butyl Alcohol/Cyclo</i>
<i>White Flammable Solids NOS</i>	<i>Flammable Solid</i>	<i>UN 1325</i>	<i>550 L</i>	<i>Gals</i>	<i>[6]</i>	<i>[] [] [] </i>	<i>DR</i>	<i>D.O.D.I.</i>	<i>Alcohol Sludge</i>
<i>White Flammable Solids NOS</i>	<i>Flammable Solids</i>	<i>UN 1325</i>	<i>2000 L</i>	<i>Lbs</i>	<i>P</i>	<i>[] [X] [] </i>	<i>DR</i>	<i>D.O.D.I.</i>	<i>Pine Tar</i>
<i>Black oil</i>	<i>Combustible liquid</i>	<i>NA 1270</i>	<i>3050 L</i>	<i>Gals</i>	<i>[6]</i>	<i>[] [X] [] </i>	<i>DR</i>	<i>D.O.D.I.</i>	
					<i>[]</i>	<i>[] [] [] </i>	<i>[]</i>	<i>[] [] [] </i>	
					<i>[]</i>	<i>[] [] [] </i>	<i>[]</i>	<i>[] [] [] </i>	

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
401/277-2787

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION, AND EMERGENCY RESPONSE INFORMATION

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER U.S. COAST GUARD 1-800-424-0072

REQUIRED LABELS	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.	SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR	VEHICLE ID.	STATE	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR
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	VEHICLE ID.	STATE	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR

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.

SIGLANT

1. ORIGINAL

MONTHLY DAY YEAR

HANDLING METHOD

0631-0094

TA00085

MACDONALD & WATSON
WASTE OIL CO., INC.
Box 618 Peep Toad Road
NORTH SCITUATE, RHODE ISLAND 02857
(401) 252-2800

SOLD BY <i>Joe</i>		DATE <i>5-18-84</i> 19																																
NAME <i>THE NEW DIXIE</i>																																		
ADDRESS <i>SCITUATE, RHODE ISLAND</i>																																		
CITY <i>PROVIDENCE</i>																																		
<table border="1"> <thead> <tr> <th>QUAN.</th> <th>DESCRIPTION</th> <th>AMOUNT</th> </tr> </thead> <tbody> <tr> <td><i>22</i></td> <td><i>22 GALS USED OIL</i></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td><i>3324 GALS</i></td> <td></td> </tr> <tr> <td></td> <td><i>30 L WASTE</i></td> <td></td> </tr> <tr> <td></td> <td><i>66.47 GALS</i></td> <td></td> </tr> <tr> <td></td> <td><i>(26.57 GALS OIL)</i></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="2">RECEIVED BY <i>[Signature]</i></td> <td colspan="2">TOTAL</td> </tr> </tbody> </table>				QUAN.	DESCRIPTION	AMOUNT	<i>22</i>	<i>22 GALS USED OIL</i>						<i>3324 GALS</i>			<i>30 L WASTE</i>			<i>66.47 GALS</i>			<i>(26.57 GALS OIL)</i>								RECEIVED BY <i>[Signature]</i>		TOTAL	
QUAN.	DESCRIPTION	AMOUNT																																
<i>22</i>	<i>22 GALS USED OIL</i>																																	
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	<i>30 L WASTE</i>																																	
	<i>66.47 GALS</i>																																	
	<i>(26.57 GALS OIL)</i>																																	
RECEIVED BY <i>[Signature]</i>		TOTAL																																
No. <i>5947</i> <i>Thank You</i>																																		

TA00086

0631-0095

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MacDonald

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald

REMARKS _____

CONS. NO.	IDENT.	DATE	TIME	
33939#	3	5-18-84	11:28PM	29780 lb
33928#	3	5-18-84	11:16PM	19020 lb
				10760

GROSS

TARE - DRIVER ON _____

OFF ☒

NET @ _____ PER LB.

PRICE _____

SHIPPER Teknology

W. 'ER L.B.

FAIRBANKS SCALE CAT. 083930

TA00087

0631-0096

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MacDonald & Watson

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald

REMARKS

CONS. NO. IDENT. DATE TIME

	33,180	GROSS
	19,020	TARE - DRIVER ON
	14,160	NET @ ☒ OFF PER LB.

PRICE _____

SHIPPER Tepner Agave

SHIPPER L.B.

FAIRBAN. SCALE CAT. 083930

0631-0097

TA00088

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11538

MANIFEST NUMBER

NAME		MAILING ADDRESS		PHONE NUMBER		STATE/E.P.A. I.D. NO.	
GENERATOR T. K. M. S. M. C. O.		223 Main St. Providence, RI 02908		(401) 725-1111		RI 0043219065	
PRIMARY TRANSPORTER M. D. W. H. S. N. C. O.		223 Main St. Providence, RI 02908		(401) 277-2281		RI 0043219065	
CONTINUING TRANSPORTER				()			
HAZARDOUS WASTE FACILITY M. D. W. H. S. N. C. O.		223 Main St. Providence, RI 02908		(401) 725-1111		RI 0043219065	
GENERATOR CONTACT PERSON John W. Gatto		DATE SHIPPED		MONTH DAY YEAR 05 18 74		EXPECTED/ARRIVAL DATE 05 18 74	
U.S. D.O.T. SHIPPING NAME		D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER NO. TYPE
OIL 1500		2	1500	033.23 GALS	16	001	17A
DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.		OIL 1500 WATER ?					
1.							
2.							
3.							
4.							
5.							
6.							
FOR INFORMATION CONTACT: RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 DAVIS STREET PROVIDENCE, RI 02908 (401) 277-2797/24 HOUR — (401) 277-2281		SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION, AND EMERGENCY RESPONSE INFORMATION: IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802					
REQUIRED LABELS YES 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.		DATE SHIPMENT ACCEPTED MONTH DAY YEAR 05 18 74		STATE VEHICLE I.D. RI 33068	
PLACARDS REQ'D		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.		DATE SHIPMENT ACCEPTED MONTH DAY YEAR 05 18 74		STATE VEHICLE I.D. RI 33068	
INDICATE ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT AND LIST REJECTED MATERIALS. INDICATE DISPOSITION OF REJECTED SHIPMENT.		HANDLING METHOD					
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.		0631-0098					

TA00089

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11538

MAY 1991

NAME		MAILING ADDRESS		PHONE NUMBER		STATE EPA ID NO	
GENERATOR TEKNOX APEX CO.		505 CENTRAL AV PAWTUCKET R.I. 02862		(401) 725-8000		RI D045367968	
PRIMARY TRANSPORTER MACDONALD WATSON WASTE OIL CO		POLE 18 PEEPLEDAD RD NO. SIVATE R.I. 02857		(401) 233-2800		RI D093214260	
CONTINUING TRANSPORTER				()			
HAZARDOUS WASTE FACILITY NARRAGANSETT IMPROV. CO.		223 ALLENS AV. PROV. R.I.		(401) 331-7420		D006807911	
GENERATOR CONTACT PERSON JOHN W. POTTER				DATE SHIPPED MONTH 15 DAY 18 YEAR 84		EXPECTED ARRIVAL MONTH 15 DAY 18 YEAR 84	
U.S. D.O.T. SHIPPING NAME		D.O.T. HAZARD CLASS		U.N./N.A. NO.		WT./VOL.	
WASTE OIL NOS		COMBUSTIBLE LIQUID		NA 1270		GALS	
2.							
3.							
5.							
6.							
UNIT CODE		CONTAINER NO.		E.P.A. WASTE NO.		DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.	
G		001		TRI		D001 OIL-LEAD WATER %?	
FOR INFORMATION CONTACT: RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 DAVIS STREET PROVIDENCE, RI 02908 (401) 277-2797/24 HOUR — (401) 277-2284		SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION; AND EMERGENCY RESPONSE INFORMATION: To be at 10¢/gal They figured 20% water. 24,420 lb @ 7.5 lb/gal = 3323 gal x .80 = 2,658 gal @ 10¢/gal = \$265.80					
IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802							

GENERATOR COMPLETES

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.

TRANSPORTER COMPLETES	REQUIRED LABELS ☒ YES ☐ 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.	SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR	STATE	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR
	PLACARDS READ	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	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR

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

HANDLING METHOD

1.		4.	
2.		5.	
3.			

0631-0099

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.

SIGNATURE

MONTH	DAY	YEAR

ORIGINAL

TA00090

H.W.F. COMPLETES

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 11538

MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR TEKNOR APEX CO.	505 CENTRAL AV PAWTUCKET, R.I. 02862	(401) 725-8000	RI 0045367968
PRIMARY TRANSPORTER MACDONALD WATSON WASTE OIL CO.	POLE 18 PEEPTOAD RD NO. SITUATE R.I. 02857	(401) 233-2800	RI 0093214260
CONTINUING TRANSPORTER		()	
HAZARDOUS WASTE FACILITY NARRAGANSETT IMPROV. CO.	223 ALLENS AV. PROY. R.I.	(401) 331-7420	RI 0006807911

GENERATOR CONTACT PERSON JOHN W. POTTER	DATE SHIPPED	MONTH	DAY	YEAR	EXPECTED ARRIVAL	MONTH	DAY	YEAR
		5	18	84		5	18	84

U.S. DOT SHIPPING NAME	D.O.T. HAZARD CLASS	U.N. N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
						NO.	TYPE		
WASTE OIL NOS	COMBUSTABLE LIQUID	NA 1270	033.23	GALES	G	0.01	TR	0001	OIL-LEAD WATER ?

FOR INFORMATION CONTACT:
RISLAND DEPARTMENT
W. THORNTON MANAGEMENT
5 DAVIS STREET
PROVIDENCE, RI 02906
TEL: 272-2297 24 HOURS FAX: 272-2294

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION AND EMERGENCY RESPONSE INFORMATION:

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

TRANSPORTER COMPLETES	REQUIRED LABELS ☒ YES ☐ 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.	SIGNATURE OF TRANSPORTER <i>Bill Williams</i>	DATE SHIPMENT ACCEPTED MONTH DAY YEAR 05 18 84	STATE RI	COMPANY NO. FOR TRAILER MARINE OR RAIL 33068	DATE OF DELIVERY MONTH DAY YEAR 05 18 84
	PLACARD 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	COMPANY NO. FOR TRAILER MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR

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 CORRECT TO THE BEST OF MY KNOWLEDGE.

Kerke E. Watson

SGN

MONTH	DAY	YEAR
5	18	84

HANDLING METHOD
SOL
TR
TRD

0631-0100

TA00091

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.

DATE 5/18/84 GENERATOR'S EMERGENCY PHONE ()

GENERATOR COMPLETES

TRANSPORTER COMPLETES

H.W.F. COMPLETES

WEIGHED ON A FAIRBANKS SCALE

DATE _____
 CUSTOMERS NAME Mac Donald & Watson
 ADDRESS _____
 COMMODITY Wagon Box
 CARRIER Mac Donald & Watson REMARKS _____

 CONS. NO. IDENT. DATE TIME
 613575# 3 12-14-83 4111PM 33360 lb GROSS
 613576# 3 12-14-83 1145PM 19040 lb
 TARE - DRIVER ON _____
 OFF _____
 NET @ 14/20 PER LB.

PRICE _____
 SHIPPER John A. McArthur

FAIRBANKS SC. & CAT. 083930

WEIGH. _____

0631-0101

TA00092

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MacDonald - Watson

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald - Watson

REMARKS

CONS. NO.	IDENT.	DATE	TIME		
513558#	3	12-14-83	1115AM	13350.15	GROSS
513558#	3	12-14-83	8145AM	19300.15	TARE - DRIVER ON
				14020	OFF ☒
					NET @ PER LB.

PRICE _____

SHIPPER John A. McDonald

WEIGHT L.B.

FAIRBANKS SC. LE CAT 083930

0631-0102

TA00093

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MacDonald & Watson

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald & Watson

REMARKS _____

CONS. NO.	IDENT.	DATE	TIME	
513532	3	12-15-63	121500	313500
513533	3	12-15-63	121500	123500
				12,240

GROSS _____

TARE DRIVER ON _____ OFF _____

NET @ _____ PER LB.

PRICE _____

SHIPPER Edward A. Gray, Macdonald & Watson

WEIGI L.B.

FAIRBANKS SCALE CAT. 083930

TA00094

0631-0103

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 00091

MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR TEKNOPEX CO	55 CENTRAL AVE PAWTUCKET RI 02862	(401) 725-0000	RI 00091
PRIMARY TRANSPORTER MHC DONALD H. WATSON WASTE OIL CO	40518 RECEPT RD NO SCITUATE RI 02857	(401) 532-2200	RI 00091
CONTINUING TRANSPORTER			

HAZARDOUS WASTE FACILITY WARRINGSETT Fm pco 223 Allens Ave Pawt RI	DATE SHIPPED: MONTH DAY YEAR 12 15 83	EXPECTED ARRIVAL DATE 12 15 83

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	UN/NA NO.	WT/VOL.	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OF WASTE ANALYSIS IF WASTE IS N.O.S.
						NO.	TYPE		
WASTE OIL NOS	COMBUSTABLE LIQUID	NA 1770	0.53 B3	GALS	15	001	TR	D001	OLD LEAD WATER 90?

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2787

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

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

TRANSPORTER COMPLETES

REQUIRED LABELS ☒ YES ☐ 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.	SIGNATURE OF TRANSPORTER Bill Williams	DATE SHIPMENT ACCEPTED MONTH DAY YEAR 12 15 83	STATE RI	COMPANY MHC
PLACARDS REQ'D ☐	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	COMPANY

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.

7. G. GENERATOR COPY

0631-0104

TA00095

H.W.F.

COMPLETES

GENERATOR COMPLETES

GENERATOR'S EMERGENCY PHONE

DATE

GENERATOR SIGNATURE

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.

MacDONALD & WATSON
WASTE OIL, INC.
Pole #18 Peepload Road
N. SCITUATE, RHODE ISLAND 02857

INVOICE

No 2317

TO (401) 934-0321 232-2800

Technor Apex
505 Central Avenue
Pawtucket, Rhode Island
Attn: John Potter

DATE	12-23-83
CUSTOMER ORDER NO.	P.O.# Verbal John Potter
SALESPERSON	Tony Loporchio
VIA	

TERMS Net 10 days

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1,611 Gals.	Removal of water, oil & sludge 30¢ per gallon	30¢	\$483. 30
	Credit \$377.20 for 3,772 gallons of waste oil @ 10¢ per gallon	Credit	\$377. 20
		Bal. Due	\$106. 10

ORIGINAL

Thank You!

TA00096

0631-0105

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 000998

MANIFEST NUMBER

GENERATOR NAME MAY 13 1983 TEKNO ACX CO	MAILING ADDRESS 505 CENTRAL AV. PAWTUCKET R.I. 02862	PHONE NUMBER (401) 725-8000	STATE/E.P.A. I.D. NO. RI 2045367988
PRIMARY TRANSPORTER MCDONALD-WATSON WASTE OIL CO.	POLE 18 PLETT RD. NO. SCITUATE R.I. 02857	(401) 222-2800	RI 0043214265
CONTINUING TRANSPORTER			
HAZARDOUS WASTE FACILITY NARRAGANSETT IMPROVEMENT CO	223 ALLINS AV. PROV. R.I.	(401) 331-7420	RI 0006630701

1 FORM (R.I. 000998)

DATE SHIPPED: MONTH **04** DAY **28** YEAR **83** EXPECTED ARRIVAL: MONTH **04** DAY **28** YEAR **83**

U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO.	WT./VOL.	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
						NO.	TYPE		
1 WASTE OIL N.O.S.	COMBUSTIBLE LIQUID	NA 1270	034.00		G	001	TR	0001	012-LS40
2									10% C19 + 012
3									
4									
5									
6									

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION, AND EMERGENCY RESPONSE INFORMATION

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

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

GENERATOR'S EMERGENCY PHONE
IF DIFFERENT FROM ABOVE

TRANSPORTER COMPLETES	REQUIRED LABELS ☒ YES ☐ 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.	SIGNATURE OF TRANSPORTER <i>Bill Williams</i>	DATE SHIPMENT ACCEPTED MONTH 04 DAY 28 YEAR 83	VEHICLE I.D. RI TRUCK 13	STATE RI	COMPANY NO. FOR TRAILER, MARINE OR RAIL TRUCK 13	DATE OF DELIVERY MONTH 04 DAY 28 YEAR 83
	PLACARDS REQ'D.	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	VEHICLE I.D.	STATE	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR

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

HANDLING METHOD

1	302	
2	718	
3	714	

0631-0106

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.

[Signature]
3. GEN. TOR COMPLETE COPY

MONTH **04** DAY **28** YEAR **83**

TA00097

F.W.H. COMPLETES

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

RI 000998

MANIFEST NUMBER

NAME	MAILING ADDRESS	PHONE NUMBER	STATE/E.P.A. I.D. NO.
GENERATOR TEKNOA ALEX CO	505 CENTRAL AV. PAWBUCKET R.I. 02862	(401) 725 8000	RI 00045367968
PRIMARY TRANSPORTER MCDONALD WATSON WASTE OIL CO.	POLE 18 DEPT ROAD RD. NO. SCITUATE R.I. 02857	(401) 233-2800	RI 00093214260
CONTINUING TRANSPORTER		()	
HAZARDOUS WASTE FACILITY KARRAGANSETT IMPROVEMENT CO	223 ALLENS AV. PROV., R.I.	(401) 331-7420	RI 00068079711

GENERATOR COMPLETES

1 FORM (R.I. 000998)		DATE SHIPPED		MONTH	DAY	YEAR	EXPECTED ARRIVAL		MONTH	DAY	YEAR
				04	20	83			04	20	83
US D.O.T. SHIPPING NAME	DOT HAZARD CLASS	U.N./NA NO	WT/VOL	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.		
WASTE OIL N.O.S.	COMBUSTIBLE LIQUID	NA 1270	0340.0		G		TR	0001	OIL LEAK		
									10% WATER		

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION AND EMERGENCY RESPONSE INFORMATION

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER U.S. COAST GUARD 1-800-424-8902

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED IN ACCORDANCE WITH THE INFORMATION FOR THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR'S EMERGENCY PHONE
IF DIFFERENT FROM ABOVE

DATE

GENERATOR SIGNATURE

TRANSPORTER COMPLETES

REQUIRED LABELS YES 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.	SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR	STATE	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR
			04 20 83	RI	TRUCK 3	04 20 83
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	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY YEAR

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

HANDLING METHOD

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.

7. GENERATOR COPY

MONTH DAY YEAR
0631-0107

8600098

H.W.F. COMPLETES

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MacDonald & Watson

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald & Watson

REMARKS _____

CONS. NO. IDENT. DATE TIME

#14014# 100001 4-28-88 12137PM 33880 lb GROSS

#14005# 3 4-28-88 91024M 19980 lb TARE - DRIVER ON _____

14880 OFF _____

NET @ _____ PER LB.

PRICE _____

SHIPPER T. J. B.

WEIGHER L. B.

FAIRBANKS SCALE CAT. 083930

TA00099

0631-0108

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MACDONALD-WATSON

ADDRESS _____

COMMODITY WASTE OIL

CARRIER MACDONALD-WATSON

REMARKS _____

414024# 850100 4-22-83 3:22PM 29820 lb
CONS. NO. IDENT. DATE TIME

614017# 3 4-28-83 1:41PM 19000 lb

GROSS

10620

TARE - DRIVER ON _____

OFF ☒

NET @ _____ PER LB.

PRICE _____

SHIPPER TEXNOR-APEX, PAINT.

WEIGHER _____

FAIRBANKS SCALE CAT. 083930

TA00100

0631-0109

Page 18 - Continued
NO. SCHUETTE 1110285
(401) 212-2000

SOLD BY <i>Fraser</i>		DATE <i>10-27-82</i>
NAME <i>William Apple</i>		
ADDRESS <i>Central Ave</i>		
CITY <i>Phonix AZ</i>		
☐ CHARGE ☐ CASH ☐ CREDIT ☐ 10% ☐ 15% ☐ 20%		

QUAN.	DESCRIPTION	AMOUNT
C-3	Bureau of Reports to Govt. of New York of Agents	\$904.71
		TOTAL
RECEIVED BY _____		

1981

Thank You

0631-0110

WEIGHED ON A FAIRBANKS SCALE

TOTAL 2904
G.M.P.

DATE _____

CUSTOMERS NAME MacDonald & Watson

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald & Watson

REMARKS _____

CONS. NO.	IDENT.	DATE	TIME		
413789#	3	10-27-82	2:26 PM	31280.15	GROSS
512775#	3	10-27-82	2:26 PM	18920.15	TARE - DRIVER ON
				12,360	NET @
					PRICE

OFF ☒ PER LB.

SHIPPER T. A. M.

WEIGHER L. B.

FAIRBANKS SCALE CAT. 083930

1648.608

TA00102

0631-0111

WEIGHED ON A FAIRBANKS SCALE

DATE _____			
CUSTOMERS NAME <u>MacDonald & Watson</u>			
ADDRESS _____			
COMMODITY <u>Waste Oil</u>			
CARRIER <u>MacDonald & Watson</u>			REMARKS _____
CONS. NO. _____	IDENT. _____	DATE _____	TIME _____
GROSS _____			TARE - DRIVER ON _____
TARE - DRIVER OFF <u>X</u>			NET @ _____ PER LB.
9420			PRICE _____
1256-648		SHIPPER <u>Debnor Apex Co</u>	WEIGHER <u>MacDonald</u>

FAIRBANKS SCALE CAT. 083930

TA00103

0631-0112

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

R101
MANIFEST NUA

GENERATOR TEKOR APEX COMPANY	MAILING ADDRESS 505 Central Avenue Pawtucket, RI 02862	PHONE NUMBER (401) 725-8000	STATE/E.P.A. I.D. NO. RI 0000000000
PRIMARY TRANSPORTER McDonald & Watson Waste Oil Co.	Pole 18 Peapack Road No. Scituate, RI 02857	(401) 332-2800	RI 0000000000
CONTINUING TRANSPORTED			
HAZARDOUS WASTE FACILITY HARRAGANSETT IMPROVEMENT CO.	223 Allens Ave. Providence, RI	(401) 331-7420	RI 0000000000
1 FORM (R.I. 000997)	DATE SHIPPED MONTH 10 DAY 27 YEAR 92	EXPECTED ARRIVAL MONTH 10 DAY 27 YEAR 92	

GENERATOR COMPLETES

U.S. DOT HAZARDOUS CLASS	DOT HAZARDOUS CLASS	UN. NA. NO.	WT. VOL.	UNITS	UNIT CODE	CONTAINER		E.P.A. WASTE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
						NO.	TYPE		
Waste Oil N.O.S.	combustible Liquid	NA 1270	029.04	GAIS		001	1B	0001	Oil-Lead

FOR INFORMATION CONTACT:
RHODE ISLAND DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT
75 DAVIS STREET
PROVIDENCE, RI 02908
(401) 277-2797

SPECIAL LABELS REQUIRED FOR THIS SHIPMENT: ANY CONTAINER EXEMPTION, AND EMERGENCY RESPONSE INFORMATION

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802

TRANSPORTER COMPLETES

REQUIRED LABELS ☐ YES ☐ 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.	SIGNATURE OF TRANSPORTER <i>[Signature]</i>	DATE SHIPMENT ACCEPTED MONTH 10 DAY 27 YEAR 92	STATE RI	VEHICLE I.D. 001	COMPANY NO. FOR TRAILER MARINE OR RAIL 001	DATE OF DEL. MONTH 10 DAY 27
PLACARDS REQ'D ☐	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 <i>[Signature]</i>	DATE SHIPMENT ACCEPTED MONTH 10 DAY 27 YEAR 92	STATE RI	VEHICLE I.D. 001	COMPANY NO. FOR TRAILER MARINE OR RAIL 001	DATE OF DEL. MONTH 10 DAY 27

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

SIGNATURE

MONTH **10** DAY **27** YEAR **92**

0631-0113

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED IN ACCORDANCE WITH THE HAZARDOUS WASTE MANAGEMENT ACT (42 U.S.C. 9601-9605) AND THE REGULATIONS THEREUNDER (40 C.F.R. 300.1-300.16).

TA00104

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

R
MANIF

NAME GENERATOR TEKNO APEX COMPANY		MAILING ADDRESS 505 Central Avenue Pawtucket, RI 02862		PHONE NUMBER (401) 725-8000		STATE/E.P.A. I.D. NO. RI 00A-1367-1-1	
PRIMARY TRANSPORTER McDonald & Watson Waste Oil Co.		Fole 18 Peepstead Road No. Scituate, RI 02857		(401) 232-2800		RI 00A-1367-1-1	
CONTINUING TRANSPORTER							
HAZARDOUS WASTE FACILITY NARRAGANSETT IMPROVEMENT CO.		223 Allens Ave. Providence, RI		(401) 331-7420		RI 00A-1367-1-1	
1 FORM (R.I. 000997)				DATE SHIPPED MONTH 11 DAY 27 YEAR 84		EXPECTED ARRIVAL MONTH 12 DAY 22 YEAR 84	
U.S. D O T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N./N.A. NO	WT /VOL	UNITS	UNIT CODE	CONTAINER NO. TYPE	E.P.A. WASTE NO.
Waste Oil N.O.S.	combustable Liquid	NA 1270	29.04 Gals	6	6	001 TR	0098
DESCRIPTION OF WASTE ANALYSIS IF WASTE IS N.O.S.		Oil-Lead					
FOR INFORMATION CONTACT: RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 76 DAVIS STREET PROVIDENCE, RI 02908 (401) 277-2797		SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXEMPTION AND EMERGENCY RESPONSE INFORMATION <i>Rec'd back from New York on 11-4-84</i>					
IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8802							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

TRANSPORTER COMPLETES	REQUIRED LABELS ☒ YES ☐ 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.	SIGNATURE OF TRANSPORTER <i>Bill Williams</i>	DATE SHIPMENT ACCEPTED MONTH 11 DAY 27 YEAR 84	STATE RI	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH 12 DAY 22 YEAR 84
	PLACARDS REQ'D ☐	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 11 DAY 27 YEAR 84	STATE RI	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH 12 DAY 22 YEAR 84

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.

SIGNATURE
3. GENERATOR COMPLETE COPYMONTH **11** DAY **27** YEAR **84**
DATE

0631-0114

TA00105

H.W.F. COMPLETES

WASTE OIL CO., INC.

POLE #18 Peepload Rd.
N. SCITUATE, RHODE ISLAND 02857
(401) 934-0331

SOLD BY Tony	DATE March 30 1984
NAME Teknor Apex Company	
ADDRESS 505 Central Ave	
CITY Pawtucket 02860	

[illegible]

Thank You

WEIGHED ON A FAIRBANKS SCALE

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME

MacDonald & Watson

ADDRESS _____

COMMODITY

Waste Oil

CARRIER

MacDonald & Watson

REMARKS

CONS. NO#

IDENT#

DATE

TIME

27860 lb

GROSS

15212#

3

3-30-82

3:09PM

19100 lb

TARE, DRIVER ON

OFF

NET @

PER LB.

PRICE

SHIPPER

Tehnor Apex (M)

WEIGHER

FAIRBANKS SCALE CAT. 083930

TA00107

0631-0116

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MacDonald & Watson

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald & Watson

REMARKS _____

CONS. NO.	IDENT.	DATE	TIME	GROSS	TARE - DRIVER ON	NET @	PER LB.
5205#	#3	3-30-82	12:34PM	19140 lb	OFF ☒		
0	3-30-82	2:11PM	32660 lb				

PRICE _____

SHIPPER F. A. M.

WEIGHER _____

FAIRBANKS SCALE CAT. 083930

13,520

TA00108

0631-0117

WEIGHED ON A FAIRBANKS SCALE

DATE _____

CUSTOMERS NAME MacDonald & Watson

ADDRESS _____

COMMODITY Waste Oil

CARRIER MacDonald & Watson

REMARKS _____

CONS. NO.	IDENT.	DATE	TIME		
615201#	#3 3	3-30-82	11:33AM	32800 lb	GROSS

		3-30-82	9:14AM	19280 lb	TARE - DRIVER ON

				13,520	NET @

OFF ☒ PER LB.

PRICE _____

SHIPPER T. J. [Signature]

WEIGHER D. B. [Signature]

FAIRBANKS SCALE CAT. 083930

TA00109

0631-0118

Documentation of All Mendon Avenue Waste Disposal with Manifests

A) "Waste Oil"

1/14/80 McDonald & Watson informed us that from now on they could no longer pick up our waste oil without a manifest. Subsequently we have sold the following 12 bulk loads:

1st	on 3/26/80	by McDonald & Watson	on R.I. Manifest	02649
2nd	12/19/80	"	"	02650
3rd	8/7/81	"	"	05766
4th	3/30/82	"	"	000996
5th	10/27/82	"	"	000997
6th	4/28/83	"	"	000998
7th	12/15/83	"	"	000999
8th	5/18/84	"	"	11538
9th	9/19/84	"	"	11541
10th	4/17/85	"	"	0002949
11th	8/8/85	"	"	0002951
12th	1/31/86	by East Bay Waste Oil Co.	on Mass. Manifest	BO 49977

B) Other than "Waste Oil"

On 3/31/84 Solvent Recovery Service of N.E. disposed of a bulk load of MEK & alcohols on R.I. 001000.

On 6/19/84 Solvent Recovery Service of N.E. disposed of drums of xylol/butyl alcohol, alcohol sludge, pine tar & waste oil on R.I. 11539.

On 6/21/84 Solvent Recovery Service of N.E. disposed of more drums of the same on R.I. 11540.

On 10/25/85 R.I. Liquid Waste Disposal took 650 gals. of same on N.Y. 2595078.

TA00110

0631-0119

APPENDIX C
RESPONSES TO QUESTIONS 4 – 8 FOR
330 OAKHILL AVE.

Question 5 Generation of Waste During Time of Disposal

a) 330 Oakhill Avenue, Attleboro, MA 02703

b)

Process	Commenced	Ceased
Production of Plasticizers	1968	Ongoing
Production of Color Concentrates	1970	Ongoing

c) Teknor began operating this facility in 1968 at which point it had one production unit operational, production of plasticizers. In 1970 the Color production unit was commenced. This unit required an enlargement of the T-15 building but no other buildings. Since then the Color building, T-15, was enlarged to allow for more process equipment. The Plasticizer building, C-21, has not been enlarged but more process equipment has been added over the years to allow for greater production potential.

d) The Plasticizer Unit manufactures plasticizers which are esters. The Color Unit manufactures Color Concentrates with a base of PVC and Polyethylene.

e)

Process	Raw Materials
Production of Plasticizers	C7 - C12 Alcohols, Phthalic Anhydride, Trimellitic Anhydride, Adipic Acid, Sebacic Acid, glycols, epoxidized soybean oils
Production of Color Concentrates	PVC Resin, Polyethylene, Multiple Pigments some containing heavy metals, Plasticizer

f) None Available

g)

Process	Equipment Cleaning Procedures	Quantity of Material Generated
Production of Plasticizers	Vessels are flushed using Water	Unknown
Production of Color Concentrates	Vacuum or plant air is used to clean most equipment Some equipment is washed down with water Washdown of equipment with Water and SOAP	Unknown Unknown Unknown

h)

Types of Materials Spilled	Materials/Methods used to Cleanup Spills	Disposal of Spilled Material
Alcohols	Materials were pumped to drums	Used for the production of OGAP*
Phthalic Anhydride	The Phthalic was picked up and placed in drums.	Used for the production of OGAP

* Off Grade Alcohol Phthalates

No documentation supports any transfer of any material to the Site.

Question 6 Respondents Wastes and Waste Streams (including By-Products)

a) Waste Survey, see Attachment 1 to this section

b)

Waste Name	Physical State	Chemical Composition	Color	Odor	Monthly Volume	Dates Generated
Solid Waste	Solid	Packaging containing trace amounts of Raw Materials	Various	Unknown	Apx. 60 Yards	Continuous
Waste Oil	Liquid	Lube Oils	Dark Brown	Oil	Apx. 3 Drums	Continuous
Waste Mixed Lab Solvents	Liquid	Tetrahydrofuran, Methanol, Methylene Chloride, Chloroform, Toluene	Clear	Solvent	2 Gallons	Continuous
#6 Fuel Oil & Soil	Solid	#6 Fuel Oil & Inert	Black	Oil	1000 Cubic Yards	10/85 - 12/86
#6 Fuel Oil Tank Bottoms	Sludge	#6 Fuel Oil and Water	Black	Oil	6,000 Gallons	5/86 - 7/86
QC Lab Waste	Liquid	Plasticizer and Isopropyl Alcohol				Continuous

No documentation supports any transfer of any material to the Site.

c) See flow diagrams provided in response to 5i.

d) No information Available

e)

Waste Name	Type of Container Stored in	Location of Collection	Location of Storage
Trash	Rolloff	In T-15 & C-21	East of T-15 & West of C-21
Waste Oil	55 Gallon Drums	The T-15 Building	North of the T-15 Building
Waste Mixed Lab Solvents	5 Gallon Drums	Analytical Lab	North of the T-15 Building
#6 Fuel Oil and Soil	Dump Trucks	North of the Maintenance Building	Same
#6 Fuel Oil Tank Bottoms	NA	NA	NA
QC Lab Waste	55 Gallon Drum	The C-21 Building	NA Reacted in OGAP*

OGAP: Off Grade Alcohol Phthalates

No documentation supports any transfer of any material to the Site.

Question 7 Respondents Disposal/Treatment/Storage/Recycling/Sale of Waste

a)

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Jeremy LaFrancois	330 Oakhill Avenue Attleboro, MA 02703 (508)222-2700 x 895		Teknor Apex Co EHS Specialist	
Antonio Patrizio	420 South Sixth Ave Industry, CA 91746 (626)968-4656 x 201		Teknor Apex Co General Manager	
Bill Murray	505 Central Avenue Pawtucket, RI 02861 (401)725-8000 x 382		Teknor Apex Co VP of Manufacturing	
Bob Duarte	505 Central Avenue Pawtucket, RI 02861 (401)725-8000 x 383		Teknor Apex Co Director of Teknor Color Co	
Suresh Swaminathan	300 Industrial Park Rd St. Albans, VT 05478 (802)524-7704		Teknor Apex Co	
Paul Burke	330 Oakhill Avenue Attleboro, MA 02703 (508)222-2700 x 515		Teknor Apex Co Plant Manager	

b)

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Jeremy LaFrancois	330 Oakhill Avenue Attleboro, MA 02703 (508)222-2700 x 895		Teknor Apex Co EHS Specialist	
Antonio Patrizio	420 South Sixth Ave Industry, CA 91746 (626)968-4656 x 201		Teknor Apex Co Plant Manager	
Bill Murray	505 Central Avenue Pawtucket, RI 02861 (401)725-8000 x 382		Teknor Apex Co VP of Manufacturing	
Bob Duarte	505 Central Avenue Pawtucket, RI 02861 (401)725-8000 x 383		Teknor Apex Co Director of Teknor Color Co	
Suresh Swaminathan	300 Industrial Park Rd St. Albans, VT 05478 (802)524-7704		Teknor Apex Co	
Paul Burke	330 Oakhill Avenue Attleboro, MA 02703 (508)222-2700 x 515		Teknor Apex Co Plant Manager	

c)

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Jeremy LaFrancois	330 Oakhill Avenue Attleboro, MA 02703 (508)222-2700 x 895		Teknor Apex Co EHS Specialist	
Antonio Patrizio	420 South Sixth Ave Industry, CA 91746 (626)968-4656 x 201		Teknor Apex Co Plant Manager	
Lorraine Braunsdorf	505 Central Avenue Pawtucket, RI 02861 (401)725-8000 x 233		Teknor Apex Co Corp. EHS Specialist	
Bill Murray	505 Central Avenue Pawtucket, RI 02861 (401)725-8000 x 382		Teknor Apex Co VP of Manufacturing	
Bob Duarte	505 Central Avenue Pawtucket, RI 02861 (401)725-8000 x 383		Teknor Apex Co Director of Teknor Color Co	
Suresh Swaminathan	300 Industrial Park Rd St. Albans, VT 05478 (802)524-7704		Teknor Apex Co	
Paul Burke	330 Oakhill Avenue Attleboro, MA 02703 (508)222-2700 x 515		Teknor Apex Co Plant Manager	

d)

Name	Job Title	Duties with Dates	Supervisor	Current Position	What type of information is possessed?
Jeremy LaFrancois	EHS Specialist	General Environmental Oversight 1/2/96-Present	Paul Burke	Same	General Plant Environmental Information
Antonio Patrizio	Plant Manager-Hebronville	General Plant Management 1975 - 1987	Herb Malin	General Manager MacLin Co	General Plant Information
Lorraine Braunsdorf	Environmental Project Manager	General Environmental Oversight 1992-1996	Phil Morse	Same	General Plant Environmental Information
Robert Duarte	Plant Manager	General Plant Management 1989 - 1994	Bill Murray	Director of Teknor Color Co	General Plant Information
Suresh Swaminathan	Plant Manager	General Plant Management 1994-1996	Bill Murray		General Plant Information
Paul Burke	Plant Manager	General Plant Management 1996 - Present	Bill Murray	Same	General Plant Information
Bill Murray	Plant Manager	General Plant Management 1987 - 1989	Herb Malin	VP of Manufacturing	General Plant Information

e) Types of Containers Used (NK = Not Known)

Waste Name	Type of Container	Color of Container	Markings	Labels inc. Contents thereof	New or Used Container?	Prior Use
Trash	Rolloff	NK	NK	NK	NK	NK
Waste Oil	55 Gallon Drum	NK	NK	NK	NK	NK
Waste Mixed Lab Solvents	5 Gallon Drum	NK	NK	NK	NK	NK
#6 Fuel Oil and Soil	Roll Off	NK	NK	NK	NK	NK
#6 Fuel Oil Tank Bottoms	NK	NK	NK	NK	NK	NK

f) None found

g) None found

h thru n, and r)

Waste Name	Where Disposed of (r & h)	Who Carried it (i,j,k)	What was the Frequency of Shipment (l)	What was the Volume of Shipments (m)	Dates material shipped (n)
Solid Waste	NK	Goddard and Boyer	Monthly	30 Yards	Continuous
Waste Oil	Olson's Greenhouse	Samson Oil	Quarterly	1000 Gallons	
#6 Fuel Oil with Dirt	Narragansett Improvement Co	MacDonald and Watson	Intermittent	25 Yards	10/85 - 12/86
#6 Fuel Oil Tank Bottoms	Clean Harbors of Kingston Inc.	Same	One time	6,000 Gallons	5/86 - 7/86
Waste Mixed Lab Solvents	Northeast Solvents Reclaim Corp.	Same	Quarterly	5 Gallons	Continuous

No documentation supports any transfer of any material to the Site.

o) See Attached Manifests

p) What types of Vehicles were used for transport? Waste Oil: 1,000 gallon Vacuum Truck, marking and colors unknown.

q) See Attached Manifests

r) see above chart

s) See Attached Manifests

t)

Waste Name	Method for Inventory of Waste	Method to request pickup	Who was contacted for pickup	Amount Paid for pickup	Who Paid	Where was payment sent
Solid Waste		Scheduled				
Waste Oil		Call the Vendor	Olson's Greenhouse			
#6 Fuel Oil with Dirt						
#6 Fuel Oil Tank Bottoms						
Waste Mixed Lab Solvents						
QC Lab Waste						

- u) Teknor Apex chose the disposal location for hazardous wastes. The Carrier choose the location of disposal for non-hazardous wastes (solid wastes).
- v) Teknor Apex arrived at our response for question u, by conducting interviews with previous Plant Managers for the site. No documented evidence available at the site.

w) Wastes sent to drains on-site

Waste Name	Chemical Composition	Dates released From and To	Quantity (i.e. per Month)	Where was it drained to?	Pretreatment Provided?
Waste Water	Plasticizers, Alcohols, Heavy Metals, and Water	1968 to the Present		from 1974 on it went to a separation vessel, a settling tank, and then through Primary Treatment	Yes

- x) Wastewater was sent to the Attleboro POTW, from 1974 to the present. Pre-1974 the water was sent to the 10 Mile River.

y)

Sanitary: Pumped by Sanitation Company for shipment to the Attleboro POTW

Wastewater: DAF sludge was originally pumped to sludge drying beds for Biotic Treatment. Latter the material was dried and drummed for disposal post 1986.

- z) No documentation supports any transfer, of any material, to the Site.

Question 8 Respondents Environmental Reporting

- a) MAD000211458
- b) None
- c) NA
- d) 1) State of Rhode Island
Department of Environmental Management
Division of Air and Hazardous Materials
75 Davis Street
Providence, RI 02908
- 2) Commonwealth of Massachusetts
Department of Environmental Quality Engineering
Division of Solid Hazardous Waste
One Winter Street
Boston, MA 02108
- 3) State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028
Trenton, NJ 08625
- 4) Michigan Department of Natural Resources
PO Box 30038
Lansing, MI 48009
- 5) Vermont Agency of Natural Resources
Hazardous Materials Management
103 South Main Street
Waterbury, VT 05676
- 6) State of Connecticut
Department of Environmental Protection
Hazardous Waste Manifest Program, State Office Building
Hartford, CT 06106
- 7) New Hampshire Department of Environmental Services
Waste Management Division
Health & Human Services Building
6 Hazen Drive
Concord, NH 03301
- 8) State of Arkansas
Department of Pollution Control and Ecology
PO Box 8913
Little Rock, AK 72219
- 9) Texas Water Commision
PO Box 13087, Capitol Station
Austin, TX 78711

- 10) State of New York
 Department of Environmental Conservation
 Division of Hazardous Substance Regulation
 Hazardous Waste Manifest
 PO Box 12820
 Albany, NY 12212
- 11) Missouri Department of Natural Resources
 Division of Environmental Quality
 Hazardous Waste Program
 PO Box 176
 Jefferson, MO 65102
- 12) Indiana Department of Environmental Management
 Office of Solid and Hazardous Waste Management
 PO Box 7035
 Indianapolis, IN 46207
- 13) Pennsylvania
- 14) North Carolina
- 15) Massachusetts Department of Environmental Protection
 Southeast Region
 Emergency Response Division
 20 Riverside Drive
 Lakeville, MA 02347

e)

1. 1985, 1986, 1994, 1995, 1996, 1997, 1998, 1999.
2. 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999.
3. 1987, 1988, 1989, 1990, 1991, 1992, 1998
4. 1990, 1998, 1999
5. 1991
6. 1991, 1992, 1993, 1994, 1995, 1996, 1997
7. 1993, 1994
8. 1994, 1998, 1999.
9. 1995
10. 1995
11. 1996
12. 1998, 1999
13. 1989, 1992
14. 1995
15. 1988, 1992, 1994, 1995, 1996, 1997, 1998.

f)

1. Toxic Substance Control Act
2. Emergency Planning & Community Right to Know Act
 - a) Tier II
 - b) Superfund Amendment Reauthorization Act
3. Clean Water Act
 - a. Water Permit
 - b. Stormwater Permit
4. 310 CMR 7.02(2)
5. 310 CMR 7.02(15)
6. Toxic Use Reduction Act
7. 310 CMR 40.0424 - 40.0427 (Subpart D)
8. Comprehensive Environmental Resource Conservation and Liability Act

g)

1. Oppt Document Control Officer
U.S. EPA, Office of Pollution Prevention & Toxics (7407)
401 M St.
Washington, DC 20460
Attn: Inventory Update Rule
2. a) State Emergency Planning Commission
c/o DEP
20 Riverside Drive
Lakeville, MA 02347
b) EPCRA Reporting Center
PO Box 3348
Merrifield, VA 22116
Attn: Toxic Chemical Release Inventory
Magnetic Media Submission
3. a) Massachusetts Department of Environmental Protection
Southeast Region
20 Riverside Drive
Lakeville, MA 02347
b) Stormwater Notice of Intent
401 M Street Southwest
Washington, DC 20460
4. Massachusetts Department of Environmental Protection
Southeast Region
20 Riverside Drive
Lakeville, MA 02347

5. Massachusetts Department of Environmental Protection
One Winter Street, 7th Floor
Boston, MA 02108
Attn: Information Management and Evaluation Branch
6. Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108
7. Massachusetts Department of Environmental Protection
Southeast Region
20 Riverside Drive
Lakeville, MA 02347
8. Unknown

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

Information Request Waste Survey

Name of Respondent: Teknor Apex Co.

Respondent's Location: 330 Oakhill Ave
Attleboro, MA 02703 Date: February 22, 1999

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location.
Acids				
Adhesives				
Asbestos (incl. Insulation and transite piping)				
Adsorbents (from spills, leaks, etc.)				
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				

TA00124

0631-0133

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed i Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Lubricants	Vacuum Truck	Waste Oil Samson Oil		Burned for Heating
Oils	1. Rolloff 2. Vacuum Truck	Waste #6 Oil & Soil Waste #6 Oil & Water	~~*~~	Unknown
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				

~~*~~ No documentation supports any transfer
of any material to the Site ii

TA00125

0631-0134

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	Etching Solutions				
	Filters				
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes	55 Gallon Drums	Waste Tetrahydrofuran Mixture (NE Solvents	*	Unknown
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				

iii

* No documentation supports any transfer of any material to the Site

TA00126

0631-0135

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	other: (e.g. tanks)				
	Paint and Coating Wastes:				
	paint				
	pigments				
	stripper				
	stains				
	thinner				
	turpentine				
	varnish				
	other:				
	PCBs (polychlorinated biphenyls)				
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed i Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Photography Wastes:				
developers				
fixers				
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes	Vacuum Truck	Septic System Waste Sanitation Co	*	Waste Water Treatment
Sludges				

* No documentation supports any transfer of any material to the Site

v

TA00128

0631-0137

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				
Solvents				
Waste Oils				
Wood Preservatives				
Other:				



Boston, Massachusetts 02108

Form Approved OMB No. 2000-0404. Expires 7-31-86
EPA Form 8700-22 (Rev. 4-85 Previous addition is obsolete)

TA00130



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA 10 00 02 11 14 15 8 0 0 1 1		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law					
3. Generator's Name and Mailing Address TEKNOR APEX COMPANY Oakhill Ave. Attleboro, MA 02703						A. State Manifest Document Number MA 092478							
4. Generator's Phone ()						B. State Gen. ID Same							
5. Transporter 1 Company Name Samson Oil						C. State Trans. ID 2181 1 1 1 A 7 0 6 0 3 MA							
6. US EPA ID Number MA 10 17 15 16 19 13 15 7 12						D. Transporter's Phone () 617 7761-7273							
7. Transporter 2 Company Name						E. State Trans. ID							
8. US EPA ID Number													
9. Designated Facility Name and Site Address Olson's Greenhouse 590 South St. Raynham, MA						F. Transporter's Phone ()							
10. US EPA ID Number MA 10 15 19 17 13 13 13 7 18						G. State Facility's ID Not Required							
						H. Facility's Phone 617 822-1151							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. WASTE OIL (Machinery lubricating oils)						0 0 1 L		1 1 0 0 0		Gal.		MA 10 0 1	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)						K. Handling Codes for Wastes Listed Above							
a. Waste Oil						a.							
b.						b.							
c.						c.							
d.						d.							
15. Special Handling Instructions and Additional Information													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name Antonio R. Parrizio						Signature <i>Antonio R. Parrizio</i>						Date Month Day Year 09 26 86	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Sam Battaglia</i>						Date Month Day Year 09 26 86	
Printed/Typed Name Sam Battaglia						Signature						Date	
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature						Date	
Printed/Typed Name						Signature						Date	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name Antene Lorette						Signature <i>Antene Lorette</i>						Date Month Day Year 09 26 86	

Form Approved OMB No. 2000-0404. Expires 7-31-88
EPA Form 8700-22 (Rev. 4-85 Previous addition is obsolete)

COPY>3:

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0631-0140

TA00131

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street
Boston, Massachusetts 02108

JOB #1330R

Please print or type. (Form designed for use on site (12-printer typewriter))

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA1000911458		Manifest Document No. 1330R		2. Page 1 of 1 Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address TEKNO APEX INC. RFD OAK HILL AVE				A. State Manifest Document Number MA C044232			
4. Generator's Phone (617) 322370 ATTLEBORO, MA 02703				B. State Gen. ID SAME			
5. Transporter 1 Company Name CLEAN HARBORS OF KINGSTON INC.				C. State Trans. ID MA100319322250			
7. Transporter 2 Company Name				D. Transporter's Phone (617) 585511			
9. Designated Facility Name and Site Address CLEAN HARBORS OF KINGSTON INC. 100 JOSEPH ST. KINGSTON MA				E. State Trans. ID MA100319322250			
10. US EPA ID Number				F. Transporter's Phone ()			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				G. State Facility's ID Not Required			
a. WASTE OIL H.O.S.				H. Facility's Phone (617) 585511			
b. COMBUSTIBLE LIQUID NA 1270				12. Containers			
				No. Type 13 Total Quantity 14 Unit Wt/Vol 15 Waste No			
				001 TT 02600 G 11001			
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)				K. Handling Codes for Wastes Listed Above			
a. WASTE OIL SLUDGE				a. T13LS			
b. + WATER				b. 			
15. Special Handling Instructions and Additional Information TANK CLEANING							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.							
Printed/Typed Name LEO BERARD		Signature <i>Leo Berard</i>		Date 05/28/86			
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Rex A. Ridge</i>		Date 05/28/86			
Printed/Typed Name REX A. RIDGE		Signature <i>Rex A. Ridge</i>		Date 05/28/86			
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date			
Printed/Typed Name		Signature		Date			
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19							
Printed/Typed Name Richard S. Hume		Signature <i>Richard S. Hume</i>		Date 05/28/86			

Form Approved OMB No. 2000-3052 Expires 7-31-96
EPA Form 8700-22 (Rev. 4-85 Previous edition is obsolete)

0631-0141

COPY 3:

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TA00132



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street
Boston, Massachusetts 02108

JOB # 1881R

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA0101021114681881R	Manifest Document No. MA0101021114681881R	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address TEKNOR APEX INC. RFD. OAK HILL AVE. ATTLEBORO MA. 02703				A. State Manifest Document Number MA C 055834	
4. Generator's Phone 617 222 2700				B. State Gen. ID SAME	
5. Transporter 1 Company Name CLEAN HARBORS OF KINGSTON INC.		6. US EPA ID Number MA0101021114681881R		C. State Trans. ID MAE 870138	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 617 5855111	
9. Designated Facility Name and Site Address CLEAN HARBORS OF KINGSTON INC. 100 JOSEPH ST. KINGSTON MA		10. US EPA ID Number MA0101021114681881R		E. State Trans. ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				F. Transporter's Phone	
a. WASTE OIL N.O.S. COMBUSTABLE LIQUID N.A. 1270 001 TT 010286 G 0001				G. State Facility's ID Not Required	
b.				H. Facility's Phone 617 5855111	
c.				12. Containers	
d.				13. Total Quantity	
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.) WASTE #6 OIL SLUDGE + WATER				14. Unit Wt/Vol	
K. Handling Codes for Wastes Listed Above a. T1315				15. Waste No.	
15. Special Handling Instructions and Additional Information CLEANED TANK				16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.	
Printed/Typed Name LEO BERARD		Signature Leo Berard		Date 01/02/86	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Rex A. Ridge		Date 01/02/86	
Printed/Typed Name REX A. RIDGE		Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name John Rego		Signature John Rego		Date 1/12/86	

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street
Boston, Massachusetts 02108

1881R

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA D10101012111145181501/07	Manifest Document No. 1 of 1	2. Page 1 Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address TICK NOR APFX CO 222 2700			A. State Manifest Document Number MA C 052124		
4. Generator's Phone 617 222 2700			B. State Gen. ID SAND		
5. Transporter 1 Company Name Clean Harbor of Kingston INC			C. State Trans. ID ME 080453		
6. US EPA ID Number MA D03913010150			D. Transporter's Phone 617 222 2700		
7. Transporter 2 Company Name			E. State Trans. ID		
8. US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address Clean Harbor of Kingston INC 100 Joseph St. Kingston MA MA D1035312122150			G. State Facility's ID Not Required		
10. US EPA ID Number			H. Facility's Phone		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt Vol	15. Waste No.
a. Waste oil / NOS / 1270 / combustible liquid		001	131200	G	MOOR
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.) 6011 Tank Bottoms			K. Handling Codes for Wastes Listed Above a. T1315		
b.			c.		
d.			d.		
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.					
Printed/Typed Name ALBERT H. BERNARD		Signature [Signature]		Date 070286	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature [Signature]		Date 070286	
Printed/Typed Name Ken Nappi		Signature [Signature]		Date 070286	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature [Signature]		Date 070286	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name Richard S. Hume		Signature [Signature]		Date 070286	

Form Approved OMB No. 2000-0004 Expires 7-31-86

EPA Form 8700-22 (Rev. 4-85 Previous addition is obsolete)

TA00134

MA C 052124 COPY 3: GENERATOR-MAILED BY TSDP



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

11-33

FR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No MA D000211V458	Manifest Document No 1111		2. Page 1 of 1 Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address TEKNOR Apex OAK HILL AVE ATTLEBORO MASS				A. State Manifest Document Number MA C 059325		
4. Generator's Phone 508-344-1111				B. State Gen. ID Same		
5. Transporter 1 Company Name MacDonald Watson		E. US EPA ID Number RI D009321V4260		C. State Trans. ID RI 21200		
7. Transporter 2 Company Name None		8. US EPA ID Number None		D. Transporter's Phone 901-9460000		
9. Designated Facility Name and Site Address NARR IMPROVEMENT 223 ALLIANS AVE PROV RI		10. US EPA ID Number RI D00680791V		E. State Trans. ID None		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				F. Transporter's Phone None		
a. HAZARDOUS WASTE Solid NOS ORME NA 9189				12. Containers No. Type 901 DR 25 yd mppv		
b. None				13. Total Quantity 25 yd		
c. None				14. Unit Wt/Vol		
d. None				15. Waste No. 7420		
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)				K. Handling Codes for Wastes Listed Above		
a. Oil + Soil				a. S P R		
b. None				b. None		
c. None				c. None		
d. None				d. None		
15. Special Handling Instructions ACCEPTED FOR PROCESSING AT ASPHALT PRODUCTION PLANT						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name LEG. BEARD				Signature Leg. Beard		
Date 10/1/85				Month Day Year 10 1 85		
17. Transporter 1 Acknowledgement of Receipt of Materials				Date 10/1/85		
Printed/Typed Name Ken R. Hays				Signature Ken R. Hays		
Date 10/1/85				Month Day Year 10 1 85		
18. Transporter 2 Acknowledgement of Receipt of Materials				Date None		
Printed/Typed Name None				Signature None		
Date None				Month Day Year None		
19. Discrepancy Indication Space 27.05 Tons						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name K. E. Eversen				Signature K. E. Eversen		
Date 10/1/85				Month Day Year 10 1 85		

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

GENERATOR

TRANSPORTER

FACILITY

MA C 059325 10/1/85 GENERATOR-MAILED BY TSDP

Form Approved OMB No. 2000-0404 Expires 7-31-86
EPA Form 8700-22 IR-85 Previous addition is obsolete

0631-0144

TA00135



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

6-5-87
FV

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA000021415B		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address TEKNO APEX OAK HILL AVE ATTAPORU MASS						A. State Manifest Document Number MA C 059322			
4. Generator's Phone ()						B. State Gen. ID Same			
5. Transporter 1 Company Name MAC DONALD WATSON						6. US EPA ID Number RI D093214260			
7. Transporter 2 Company Name						C. State Trans. ID RI 2240			
8. US EPA ID Number						D. Transporter's Phone () 701 996 0000			
9. Designated Facility Name and Site Address NARR IMPROVEMENT 223 ATLANS AVE PROV RI						E. State Trans. ID			
10. US EPA ID Number RI D0006807911						F. Transporter's Phone ()			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						G. State Facility's ID Not Required			
a. HAZARDOUS WASTE SOLID NOS ORME NA 9189						H. Facility's Phone () 401 331 6000			
b.						12. Containers No. Type			
c.						13. Total Quantity 25 yd			
d.						14. Unit Wt/Vol M001			
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.) Oil + Sol.						K. Handling Codes for Wastes Listed Above SOB			
15. NON-HAZARDOUS IN RHODE ISLAND ACCEPTED FOR PROCESSING AT ASPHALT PRODUCTION PLANT.									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.									
Signature Antonio R. Patrizio						Date Month Day Year 1/00/86			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Ken Ph. H.						Signature Ken Phellyn			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature			
19. Discrepancy Indication Space 33.38									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						0631-0145			
Printed/Typed Name Kinke Everson						Signature K. B. Everson			
						Month Day Year 1/00/86			

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

GENERATOR

TRANSPORTER

FACILITY

MA CUS3322 COPY>3: GENERATOR-MAILED BY TSDF

Form Approved OMB No. 2000-0404. Expires 7-31-86
EPA Form 8700-22 (Rev. 4-85 Previous addition is obsolete)

TA00136



DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		Generator US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law
3. Generator's Name and Mailing Address Jekno Apex Corp Oak Hill Ave Attleboro Mass 01903				A. State Manifest Document Number MA-0090884	
4. Generator's Phone 617-222-2700				B. State Gen. ID SAMP	
5. Transporter 1 Company Name Mac Donald & Watson		6. US EPA ID Number RID093214260		C. State Trans. ID RI30588	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (401) 232-7800	
9. Designated Facility Name and Site Address Marquardt Improvement Co 223 Allens Ave. Providence, RI		10. US EPA ID Number RID006807911		E. State Trans. ID	
				F. Transporter's Phone ()	
				G. State Facility's ID Not Required	
				H. Facility's Phone (401) 331-0051	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. 9187 Hazardous Waste - Solids N.O.S., ORM-EPA 001 DT		25	40	40	MDP1
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.) Oil Cont. dirt		K. Handling Codes for Wastes Listed Above a. S P B			
b. NON-HAZARDOUS IN RHODE ISLAND		c.			
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.					
Printed/Typed Name ANTONIO R PATRIZIO		Signature Antonio Patrizio		Date 10/1/85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Michael P. Greaney		Date 10/1/85	
Printed/Typed Name Michael P Greaney		Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name KIRKE EVERSON		Signature Kirke Everson		Date 10/1/85	

Form Approved OMB No. 2000-0404, Expires 7-31-88

EPA Form 8700-22 (Rev. 4-85 Previous addition is obsolete).

COPY>3:

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TA00137



DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA000002214581	Manifest Document No. 0087	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Teknor Apex Company Oak Hill Ave. Attleboro Mass 02703				A. State Manifest Document Number MA-0090881		
4. Generator's Phone 617-222-2700				B. State Gen. ID		
5. Transporter 1 Company Name MacDonald & Watson		6. US EPA ID Number RI0093214260		C. State Trans. ID R230588		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 401-232-2800		
9. Designated Facility Name and Site Address NARRAGANSETT IMPROVEMENT CO 223 Allens Ave Providence RI		10. US EPA ID Number RI0006802911		E. State Trans. ID		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. 9189 HAZARDOUS WASTE Solids N.O.S., ORM-ENA 001 DT 25, L						
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)				K. Handling Codes for Wastes Listed Above		
a. Oil Cont. DLT				5013		
b.				c.		
15. Special Handling Instructions and Additional Information NON-HAZARDOUS ACCEPTED ASPHALT PRODUCTION PLANT				d.		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name ROBERT H. LEONARD				Signature Robert H. Leonard		Date 2/10/85
17. Transporter 1 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name Michael P. G. H. P. R. UY				Signature Michael P. G. H. P. R. UY		Date 2/9/85
18. Transporter 2 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name				Signature		Month Day Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name KIRKE EVERSON				Signature Kirke Everson		Date 2/11/85

Form Approved OMB No. 2000-0404, Expires 7-31-86
EPA Form B700-22 (Rev. 4-85) (Previous addition is obsolete)

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TA00138



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

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Form Approved GMB No. 2000-0404 Expires 1/31/86

For spills within Rhode Island, contact the R.I. Department of Environmental Management (401) 277-2797. For spills outside Rhode Island, contact the U.S. Coast Guard 1-800-424-8802. For spills within Rhode Island, contact the R.I. Department of Environmental Management (401) 277-2797. 24 Hour (401) 277-2261

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MAD 000211458	Manifest Document No. 604	2. Page 1 1 of 1	Information in the shaded areas is not required by Federal law but may be required by state law.
3. Generator's Name and Mailing Address TEKNOX APEX COMPANY Oak Hill Ave. Attleboro, MA 02703 4. Generator's Phone (617) 222-2700			A. State Manifest Document Number RI A 0002956		B. State Generator's ID Same
5. Transporter 1 Company Name McDonald & Watson		6. US EPA ID Number RI003214260		C. State Transporter's ID: 17505 R.I.	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone: 232-2800	
9. Designated Facility Name and Site Address Narragansett Improvement Co. 223 Allens Ave. Prov., R.I.		10. US EPA ID Number RI006807911		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID Same	
				H. Facility's Phone 401-331-0051	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. HAZARDOUS WASTE - SOLIDS N.O.S., ORM-R N.A. 9189		001 DT	25	Y	1001
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
a. Oil cont. dirt		a. 503			
b.		b.			
c.		c.			
d.		d.			
15. Special Handling Instructions and Additional Information					
NON-HAZARDOUS IN RHODE ISLAND ACCEPTED FOR RECYCLING AND ASPHALT PAVING PLANTS "Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment."					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name Antonio P. Patrizio		Signature <i>Antonio P. Patrizio</i>		Date Month Day Year 10 16 85	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>James E. Maise Jr.</i>		Date Month Day Year 10 16 85	
Printed/Typed Name James E. Maise Jr.		Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19					
Printed/Typed Name KIRKE EVERSON		Signature <i>Kirke Everson</i>		Date Month Day Year 10 16 85	

EPA Form 2700-22 (7-84)

Copy 3: Generator Completed Conv-Mailed by T&E

TA00139



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

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Form Approved OMB No. 2000-0404 Expires 7-31-85

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No MAD 000211458	Manifest Document No 003	2. Page 1 of 1	Information in the spaces below is not required by Federal law but may be required by state law
3. Generator's Name and Mailing Address TEKNOR APEX COMPANY Oak Hill Ave. Attleboro, MA 02803			A. State Manifest Document Number RI A 0002955		
4. Generator's Phone (617) 222-2700			B. State Generator's ID Same		
5. Transporter 1 Company Name McDonald & Watson			6. US EPA ID Number RID093214260	C. State Transporter's ID 17505 R.I.	
7. Transporter 2 Company Name			8. US EPA ID Number	D. Transporter's Phone 232-2800	
9. Designated Facility Name and Site Address Narragansett Improvement Co. 223 Allens Ave. Prov., R.I.			10. US EPA ID Number RID006807911	E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID Same	
				H. Facility's Phone 401-331-8051	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. HAZARDOUS WASTE - SOLIDS N.O.S., ORM-E N.A. 9189			001 DT	25	Y
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
a. Oil cont. dirt			a. S03		
b.			b.		
c.			c.		
d.			d.		
15. Special Handling Instructions and Additional Information NON-HAZARDOUS WASTE PLANT ACCEPTED FOR 1 MONTHS ASPHALT PRODUCTION PLANT "Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment."					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.					
Printed/Typed Name Antonio R. Parrizio			Signature <i>Antonio R. Parrizio</i>		Date Month Day Year 10 16 85
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature <i>James E. Maise Jr.</i>		Date Month Day Year 10 16 95
Printed/Typed Name James E. Maise Jr.			Signature		Date
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Date
Printed/Typed Name			Signature		Date
15. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19					
Printed/Typed Name KIRKE EVERSON			Signature Kirke Everson		Date 10 16 95

Copy 3: Generator Completed Copy-Mailed by TSD

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0631-0149

TA00140



DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

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Form Approved OMB No. 2009-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No MAD 000211458		Manifest Document No 002		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but may be required by State law	
3. Generator's Name and Mailing Address TEKNOR APEX COMPANY Oak Hill Ave. Attleboro, MA 02703 4. Generator's Phone (617) 222-2700				6. US EPA ID Number RID093214260		A. State Manifest Document Number RI A 0002954			
5. Transporter 1 Company Name McDonald & Watson				8. US EPA ID Number		C. State Transporter's ID 17505 R.I.			
7. Transporter 2 Company Name				10. US EPA ID Number		D. Transporter's Phone 232-2800			
9. Designated Facility Name and Site Address Narragansett Improvement Co. 223 Allens Ave. Prov., R.I.				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HAZARDOUS WASTE - SOLIDS, N.O.S., ORM-E M.A. 9189				15. Containers No. Type		16. Total Quantity		17. Unit Wt/Vol	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		L. Waste No.			
15. Special Handling Instructions and Additional Information NON-HAZARDOUS ACCEPTED FOR REUSE ADDITIONAL INFORMATION				"Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment."					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.				Printed/Typed Name Antonio R. Patrino		Signature Antonio R. Patrino		Date 10/16/85	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name James E. Mingo Jr.		Signature James E. Mingo Jr.		Date 10/16/85	
18. Transporter 2 Acknowledgement or Receipt of Materials				Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as item 19 Printed/Typed Name KIRKE EVERSON Signature Kirke Everson Date 10/16/85									

Copy 3: Generator Completed Copy-Mailed by TSD

RI A 0002954

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DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Division of Air and Hazardous Materials
75 Davis Street, Providence, RI 02908
(401) 277-2797

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Form Approved OMB No. 2072-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MAD 000211458	Manifest Document No. 001	2. Page 1 1 of 1	Information in the shaded areas not required by Federal law, but may be required by state law.	
3. Generator's Name and Mailing Address TEKNOR APEX COMPANY Oak Hill Ave. Attleboro, MA 02703 4. Generator's Phone (617) 222-2700			A. State Manifest Document Number RI A 0002953		B. State Generator's ID Same	
5. Transporter 1 Company Name McDonald & Watson		6. US EPA ID Number RID093214260		C. State Transporter's ID 17505 R.I.		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 232-2800		
9. Designated Facility Name and Site Address Narragansett Improvement Co. 223 Allens Ave. Prov., R.I.		10. US EPA ID Number RIB006807911		E. State Transporter's ID F. Transporter's Phone G. State Facility's ID Same H. Facility's Phone 401-331-0051		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit M/Vol	15. Waste No.
a. HAZARDOUS WASTE - SOLIDS, N.O.S., ORM-E, N.A. 9189		001	DT	25	Y	0001
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
a. 011 cont. dirt		b. S22 c. T01				
15. Special Handling Instructions and Additional Information NON-HAZARDOUS IN RHODE ISLAND ACCEPTED FOR RECYCLING AT ASPHALT PRODUCTION PLANT. "Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment."						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.						
Printed/Typed Name Antonio R. Patriotic		Signature <i>Antonio R. Patriotic</i>		Date Month Day Year 10/16/85		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name JAMES E. MUISE JR.		Signature <i>James E. Muise Jr.</i>		Date Month Day Year 10/16/85
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Date Month Day Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as - Item 19 Printed/Typed Name KIRKE EVERSON Signature <i>Kirke Everson</i> Date 10/16/85						

EPA Form 8700-12 3-85

0631-0151

TA00142



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

W-5371

FR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA 0000211458		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address TEKNOR APEX COMPANY Oakhill Ave. Attleboro, MA 02771				4. Generator's Phone ()		A. State Manifest Document Number MA 0092479							
5. Transporter 1 Company Name MacDonald Watson				6. US EPA ID Number RI 0000214260		C. State Trans. ID RI 2200							
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone (401) 946-0200							
9. Designated Facility Name and Site Address Narr. Improvement 223 Allans Ave. Prov., R.I.				10. US EPA ID Number RI 0006807911		E. State Trans. ID							
						F. Transporter's Phone ()							
						G. State Facility's ID Not Required							
						H. Facility's Phone (401) 8331-7640							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. Hazardous Waste Solid NOS ORME NA 9189						00 1 DT		2 5		Yd.		M 00 0 1	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code.)						K. Handling Codes for Wastes Listed Above							
a. Oil & Soil						a. S O B							
b.						b.							
NON-HAZARDOUS IN RHODE ISLAND ACCEPTED FOR PROCESSING AT ASPHALT PRODUCTION PLANT.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name ANTONIO R PATRIZIO										Signature <i>Antonio Patrizio</i>		Date 11/08/86	
17. Transporter 1 Acknowledgement of Receipt of Materials										Signature <i>Ken Phillips</i>		Date 11/08/86	
18. Transporter 2 Acknowledgement of Receipt of Materials										Signature		Date	
Printed/Typed Name										Signature		Date	
19. Discrepancy Indication Space 36,40 Tons													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name KIRKE EVERTSON										Signature <i>Kirke Evertson</i>		Date 11/08/86	

Form Approved OMB No. 2000-0404. Expires 7-31-88

EPA Form 8700-22 (Rev. 4-85) (Previous addition is obsolete)

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In case of emergency or spill, immediately call the National Response Center (800) 424-8802.



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA01002114581	Manifest Document No. 1005	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address TEKNO APEX Company OK Hill AVE. Attleboro MA 02703 4. Generator's Phone 617 222-2700				A. State Manifest Document Number MA 090882 B. State Gen. ID	
5. Transporter 1 Company Name MacDonald & Watson		6. US EPA ID Number RI0093214260		C. State Trans. ID RI 30588	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone () E. State Trans. ID	
9. Designated Facility Name and Site Address NARRAGANSETT IMPLEMENT CO 223 HILMS AVE PROV RI		10. US EPA ID Number RI000680911		F. Transporter's Phone 401 232-2800 G. State Facility's ID Not Required H. Facility's Phone 401 337-0057	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity Unit Wt/Vol
a. Hazardous Waste Solids N.O.S., ORM-E NH 5P16725				1	Mod
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.) Oil Cont Dirt				K. Handling Codes for Wastes Listed Above 3 03	
b. NON-HAZARDOUS IN RHODE ISLAND				d.	
15. Special Handling Instructions and Additional Information ACCEPTED ASPHALT					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.					
Printed/Typed Name ROBERT A. BERRARD		Signature Robert A. Berrard		Date Month Day Year 10/17/95	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Michael P. Ghersey		Signature Michael P. Ghersey	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name KIRKE EVERSON		Signature Kirke Everson		Date Month Day Year 11/01/95	

Form Approved OMB No. 2000-0404, Expires 7-31-96
EPA Form 8700-22 (Rev. 4-85) Previous addition is obsolete)

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TA00144



DEPA

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF SOLID AND HAZARDOUS WASTEOne Winter Street
Boston, Massachusetts 02108

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. MA0000211458	Manifest Document No. 005	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address TEKNO APEX Company Oak Hill Ave. Attleboro Mass 02703				A. State Manifest Document Number MA C090883		
4. Generator's Phone 617 222-2200				B. State Gen. ID SNMP		
5. Transporter 1 Company Name MacDonald & Watson				C. State Trans. ID RI 30588		
6. US EPA ID Number RI009217260				D. Transporter's Phone 401 222-2200		
7. Transporter 2 Company Name				E. State Trans. ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address NARRAGANSETT INCORPORATED Co 223 Allens Ave Prov. RI				G. State Facility's ID Not Required		
10. US EPA ID Number RI0066807911				H. Facility's Phone 401 331-0051		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. HAZARDOUS WASTE - SOLIDS N.O.S. ORM-L NA 001 BT 9187			25	10	400 L	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.) Oil Cont dirt			K. Handling Codes for Wastes Listed Above 5 0 3			
15. Special Handling Instructions and Additional Information NON-HAZARDOUS WASTE ACCEPTEE ASPHALT PAVEMENT PLANT						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable State laws/regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name ANTONIO R PATRIZIO			Signature Antonio R. Patrizio		Date Month Day Year 10/12/85	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature Michael P. Kennedy		Date Month Day Year 10/12/85	
Printed/Typed Name MICHAEL P KENNEDY			Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Date	
Printed/Typed Name			Signature		Date	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name KIRKE EVERSON			Signature Kirke Everson		Date Month Day Year 11/10/85	

Form Approved OMB No. 2000-0404. Expires 7-31-86
EPA Form 8700-22 (Rev. 4-85) Previous addition is obsolete)

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MA C090883

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In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

**APPENDIX D
RESPONSES TO QUESTIONS 4 – 8 FOR
20 INDUSTRIAL RD.**

Question 4 Compliance with this Request

Wilfrid Gravel-

Mr. Gravel is currently the Production Manager of Teknor Color Company. He is responsible for the production for the Teknor Color Cumberland facility. During the time period being investigated, Mr. Gravel held various titles starting with operator, production manager, plant manager of Custom Color.

Mike Renzi-

Mr. Renzi is currently the Plant Manager of Teknor Color Company in Cumberland, Rhode Island. He is responsible for all aspects of the production at Cumberland. He became a Teknor Apex Company employee in 1992. He was consulted due to his general knowledge of the plant.

Robert Duarte

Mr. Duarte is currently the Director of Teknor Color Company. He is responsible for Operations Management of Teknor Color facilities. During the time period being investigated Mr. Duarte was a lab technician and assistant manager in the plasticizer department at the Attleboro facility and for the Haywood Company in Brownsville, TN. Mr. Duarte is currently an employee of Teknor Apex.

Edith Barker-

Mrs. Barker is currently retired. Mrs. Barker's previous positions included receptionist, Office Manager, Vice President of Administration, and Purchasing Manager. Mrs. Barker worked for Custom Color until 1985 when it became Teknor Color Company.

Hugh Aaron-

Mr. Aaron is retired. He was the owner of Custom Color until it was sold in early 1985 to Teknor Apex Company.

Ed Laflamme

Mr. Laflamme is currently the Plant Manager Teknor Color Company in Lodi, OH. He has responsibility for the operation of the entire Lodi facility. During the time period being investigated he worked for Custom Color in Cumberland as an operator up to production manager. He left Rhode Island in 1979. Mr. Laflamme is currently an employee of Teknor Apex Company.

Robert Plante

Mr. Plante is currently employed as Director of Engineering Services for Joan Fabric Corp. During the time period being investigated, he was employed by Custom Color 1970-1979 in the following positions: Production Manager, Plant Manager, and Vice President of Manufacturing.

For this submission all plant manifests, Federal and State required reporting materials and permit files were examined. Records reviewed include those that were at the Cumberland facility as well as records that were found in Mr. Duarte's office. The only files from

Custom Color that are known to remain are mainly acquisition files and tax returns. No other production or process files remain.

Question 5. Generation of Waste During Time of Disposal

a. 20 Industrial Road, Cumberland, RI 02864

b.

Process	Commenced	Ceased
Production of Color Concentrates-Custom Color	1963	January 11, 1985
Production of Color Concentrates-Teknor Color Company	January 11, 1985	Ongoing

c. By the mid eighties, a major account was lost, and due to attrition and an incentive plan, the number of employees did drop.

d. Product: Color Concentrates

e.

Process	Raw Materials
Production of Color Concentrates	Organic and Inorganic Pigments; Fillers-Atomites; Zinc and Calcium Sterates; Polyolefin and Polystrene Resins; Polyurethane, ABS, and acrylics

f. None Available.

g. Cleaning (response to this question was all done by memory of the personnel contacted-no written records remain)

Most of the time cleaning of equipment was done using "dry" materials such as purging material, rags, vacuuming and high-pressure air. Purging of the equipment, floor sweepings and rags were all disposed of in the dumpster.

Quantity is unknown.

Occasional but minor usage on solvents (unknown specific solvent) used on rags were used to help clean the equipment. The rags were then disposed of in the dumpster.

Water was also used occasionally for cleaning. The water was then sent to the sewer.

Specific Equipment

Extruders were typically purged with polyethylene. Used purge material would be discarded to the dumpster.

Mills: This equipment was typically blown down with air and wiped clean.

Grinders: This equipment was typically cleaned with compressed air and/or vacuumed.

h. Spills

Types of Materials Spilled	Materials/Methods used to Cleanup Spills	Disposal of Spilled Material
Solid spills	Material would be vacuumed and/or swept	Discarded into the dumpster
Liquid spills	Very little liquid was used in the facility. If a spill occurred, speedi-dry and or rags were used for cleaning.	Discarded into the dumpster

No documentation supports any transfer of any material to the Site.

i. Refer to attached Process Flow Diagrams.

Question 6 Respondent's Wastes and Waste Streams (including By-Products)

a. Waste Survey- See Attachment 1 to this section.

Waste Name	Physical State	Chemical Composition	Color	Odor	Monthly Volume	Dates Generated
Solid Waste	Solid	Organic or inorganic colorants	Wide Variety	Unknown	Unknown	Continuous
Dust Collector Dust	Solid	Combination of materials used in facility	Brown/black	Unknown	Unknown	1966-1985

No documentation supports any transfer of any material to the Site.

b. Drawing is attached. (See Question 5i above)

c. No information available

d.

Waste Name	Type of Container Stored in	Location of Collection and Storage
Solid Waste from facility	Dumpster	Outside Building

Question 7 Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

a.

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Michael Renzi	Teknor Color Cumberland 20 Industrial Road Cumberland, RI 02864 401-333-6033 x 15		Teknor Color Co Plant Manager- Cumberland	
Unknown previous to 1985				

b) Identify persons who currently have and those who have had knowledge of disposal of waste

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Michael Renzi	Teknor Color Cumberland 20 Industrial Road Cumberland, RI 02864 401-333-6033 x 15		Teknor Color Co Plant Manager- Cumberland	
Tony Patrizio	Maclin Company 420 South Sixth Avenue Industry, CA 91746 626-968-4656 x 201		Teknor Apex Co General Manager Maclin	
Wilfrid Gravel	Teknor Color Cumberland 20 Industrial Road Cumberland, RI 02864 401-333-6033		Teknor Color Co. Production Manger	
Hugh Aaron	retired	71 Congress St Belfast, ME 04915 207-338-1921		
Robert Plante	Joan Fabric Corp 100 Vesper Executive Park Tyngesboro, MA 01879 978-649-5626 x-181		Director of Engineering Services Joan Fabric Corp	
Ed Laflamme	Teknor Color Company 120 West Drive Lodi, OH 44254 330-948-2035		Plant Manager Teknor Color Comp	

c.) Environmental Matters Responsibility:

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Michael Renzi	Teknor Color Cumberland 20 Industrial Road Cumberland, RI 02864 401-333-6033 x 15		Teknor Color Co Plant Manager- Cumberland	
Dan Goodrow	Teknor Color Company 120 West Drive Lodi, OH 44254 330-948-2035		Teknor Color Co EHS Manager	
Tony Patrizio	Maclin Company 420 South Sixth Avenue Industry, CA 91746 626-968-4656 x 201		Teknor Apex Co General Manager Maclin	

d) Additional information for above people

Name	Job Title	Duties with Dates	Supervisor	Current Position	What type of information is possessed?
Michael Renzi	Plant Manager- Cumberland	General Plant Management 6/95-Present	Robert Duarte	Same	General Plant Information
Tony Patrizio	Director of Color	General Plant Management 1987-1995	Bert Lederer	General Manager- Maclin Company	General Plant Information
Wilfrid Gravel	Production Manager	Various Production and Manufacturing Positions 1970 to present	Current Supervisor- Michael Renzi	Production Manager	General Plant Information

Hugh Aaron	Owner. Custom Color	1963-1985	None	Retired	General Plant Information
Robert Plante	Production Mgr; Plant Manager; VP manuf.	General Plant Management 1970-1979	Hugh Aaron	Director of Engineering Service— Joan Fabric Corp	General Plant Information
Ed Laflamme	Production Manager	General Plant Management 1970-1978	Robert Plante	Plant Manager- Teknor Color Co- Lodi	General Plant Information

e. Types of Containers Used

Waste Name	Type of Container	Color of Container	Markings	Labels inc. Contents thereof	New or Used Container	Prior Use
Solid Waste	Dumpster	Unknown	Unknown	Unknown	Unknown	Unknown
Solid Waste	Fibrous drum (would have ended up in dumpster)	Unknown	Unknown	Unknown	Either	Unknown

f. Unknown

g. None available

h - n, and r)

Waste Name	Where Disposed of (r & h)	Who Carried it (i,j,k)	What was the Frequency of Shipment (l)	What was the Volume of Shipments (m)	Dates from and to material was shipped (n)
Solid Waste	Unknown		Unknown-	Unknown	Unknown

No documentation supports any transfer of any material to the Site.

- o. No documents available
- p. Unknown
- q. Unknown
- r. Unknown
- s. Unknown
- t. Unknown
- u. The waste carrier choose the location of disposal for non-hazardous wastes (solid waste).
- v. The respondent arrived at our response for question u, by conducting interviews with the current and previous Plant Management for the site. No documented evidence available at the site.
- w.

Waste Name	Chemical Composition	Dates released From and To	Quantity (i.e. per Month)	Where was it drained to?	Pretreatment Provided?
Waste Water Unknown date to the present *	Waste water within allowed POTW limits	Unknown to the Present		POTW	No
Waste Water Previous to POTW	Waste water	1966 to POTW built		On-site septic system	No

* the change over date from the on-site septic system to the sewer connection could not be determined.

- x. At one point the POTW was known as the Blackstone Valley District Commission which is now known as the Narragansett Bay Commission.
- y. Unknown
- z. No documentation supports any transfer, of any material, to the Site.

Question 8. Respondent's Environmental Reporting:

- a. RID001457605
- b. None known
- c. NA
- d.
 - 1. State of Rhode Island
Department of Environmental Management
Solid Waste Management Program
291 Promenade Street
Providence, RI 02908-5767
 - 2. Michigan DNR
Box 30038
Lansing, MI 48909
- e. 1995
- f.
 - EPCRA SARA 313 Reports, Tier II Report
 - CWA Storm water Permit
 - RI Regulations 14 and/or 22 Air Pollution Inventory, Air Permits
- g. Form R's and Form A's EPCRA Reporting Center, P.O. Box 3348, Merrifield,
VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY
And Rhode Island Department of Environmental Management, Division of Air
Resources, 291 Promenade Street, Providence, RI 02908 Attn: Toxic Release
Inventory

Storm water: RI Department of Environmental Management, Office of Business
Affairs, 22 Hayes Street, Providence, RI 02908

Air Pollution Inventory: Air Pollution/Toxics Inventory, Division of Air
Resources, 291 Promenade Street, Providence, RI 02908-5767

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

Information Request Waste Survey

Name of Respondent: Teknor Color Co

Respondent's Location: Cumberland Date: 3/1/99
RI

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Acids				
Adhesives				
Asbestos (incl. Insulation and transite piping)				
Adsorbents (from spills, leaks, etc.)	Dumpster	Speedi-Dry	*	Unknown
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				

* No documentation supports any transfer of any material to the Site

i.

TA00156

0631-0165

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	Lubricants				
	Oils				
	Oil Filters				
	Transmission fluids				
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Etching Solutions				
Filters				
Flammable, Reactive, or Explosive Materials				
Fungicides				
Herbicides				
Insecticides				
Insulating/Fire Proofing Materials				
Laboratory Wastes				
Lubricants				
Metals:				
grindings				
powders	solid pigments into dumpster	Unknown	*	Unknown
shavings				
sludges				
solutions				

iii * No documentation supports any transfer of any material to the Site

TA00158

0631-0167

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
other: (e.g. tanks)				
Paint and Coating Wastes:	Small Quantities (used to paint walls) may have been disposed	unknown	*	Unknown
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				

iv * No documentation supports any transfer of any material to the Site

TA00159

0631-0168

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Photography Wastes:				
developers				
fixers				
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)	(from equipment cleaning) Dumpster	Chenille Wiping cloths. Parker	*	Unknown
Rodenticides				
Septic System Wastes				
Sludges				

* No documentation supports any transfer of any material to the Site.

TA00160

0631-0169

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				
Solvents				
Waste Oils				
Wood Preservatives				
Other:				
solids from recirculated cooling water system cleanout	Barreled → Dumpster	Unknown	*	Unknown

* No documentation supports any transfer of any material to the Site

37896



TEKNOR APEX COMPANY

Peterson Puritan
11.9
200

March 26, 2001

David J. Newton
Remedial Project Manager
US Environmental Protection Agency
PO Box 6329
Boston, MA 02114-2023

Re: Request for Information Peterson / Puritan OU#2

Enclosed is Teknor Apex's information request responses for the Peterson/Puritan, Inc. Site, Operable Unit #2, the J. M. Mills Landfill. This response is for the follow up information request submitted to Teknor Apex Company.

Teknor Apex Company is complying with your request to supply additional information. However the requested information is in some cases difficult to find if it exists at all. Attached you will find our responses to most of your follow up questions. This response is incomplete. We are continuing to research specific questions to provide the most thorough answers possible. We are anticipating that we will complete our response within an additional thirty days and we will forward that additional information to you at that time

If you have any questions, please do not hesitate to call me at: 401 - 725 - 8000 ext. 137. Please continue to direct any additional written responses to:

David Yopak
Director of EHS
Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861-1900

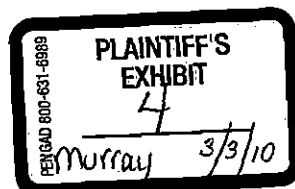
Very truly yours,

David F. Yopak
Director of Environmental, Health and Safety

cc:
Greg Benik (Knight, Holland)
Bill Murray
file

0631-0213

505 CENTRAL AVENUE • PAWTUCKET, RHODE ISLAND 02861-1900 • TELEPHONE: (401) 725-8000 • FAX: (401) 725-8095



TA00795

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

Teknor Apex Company and that the foregoing is complete, true, and correct.
Respondent

Executed on March 26 2002

Jonathan D. Lain
Signature

Type Name

President
Title [if any]

Please complete and return this form with your responses to the Information Request

0631-0214

TA00796

SUPERFUND SITE

1. The answers to the following questions were compiled using the recollections of employees who were employed during the periods of time requested. In addition to the employees referred to in the 1999 response those consulted were Jack Brady – Rubber Manager, John McDermott – Rubber Chemist. No records exist showing that Teknor Apex sent any waste to the site in question. These recollections include, that we did use Goditt & Boyer as a waste hauler for an undetermined period of time. Further recollections conclude that Goditt & Boyer was the waste hauler for our main dumpster which would have contained non-hazardous waste such as cardboard, wood, spent containers (bags, boxes or cardboard drums), floor sweepings from Rubber Division only, rubber scrap (burnt batches, cured flashing, rubber chunks) and burnt plastic batches. Goditt & Boyer occasionally supplied Teknor Apex with 50 cubic yard roll-offs which would be used to take away non-hazardous buffing dust from our shoe soling (Solite) and tire re-treading operations.

a.)

- i. John Izzo has passed away. We are unable to further define or explain the meaning of his statements
- ii. Same as i.
- iii. Same as i.
- iv. Same as i.
- v. No records exist indicating Teknor Apex sent any waste to the site.
- vi. Same as v.

b.)

- i. Chemical composition would be: styrene butadienne rubber – nitrile butadienne rubber – natural rubber.
- ii. Teknor Apex has no information to support the driver's statement that the waste would "ignite easily" or emit an odor.
- iii. No records exist for usage of any 6-yard boxes.
- iv. Same as iii.

c.)

- i. Rubber chunks - cured rubber products that would be emitted from the banbury during processing. Chemical Composition would be styrene butadienne rubber – nitrile butadienne rubber – natural rubber.
- ii. Sweepings from floors of dust generated from normal operation in Rubber Division. Chemical composition would be a wide array of powdered products common to rubber production such as zinc stearate, carbon black, sulfur, accelerators and fillers. Floor sweepings from Plastics and Hose Divisions were reused.
- iii. 55-gallon drums were commonly used to collect floor sweepings from normal operations. See (c ii) for chemical composition.
- iv. Light brown and darker fine powdery dust would be the dust generated from the sanding of shoe soling materials some of which was reused, some of which was sold to be used in the making of bowling balls. Chemical compositions see (c i).

- d.) To the best of our knowledge the "Apex Dust Stop" could refer to the area where the dust collected from sanding tire tread materials and shoe materials (Solite) was stored pending reuse, shipment to vendors or waste disposal. The location of this storage area varied over the years.
- e.)
 - i. The waste did not have a name the containers were marked with the color only.
 - ii. Chemical composition see (c i).
 - iii. Generally black or brown.
 - iv. No appreciable odor other than a characteristic rubber smell.
 - v. The waste generated from the "Apex Dust Stop" was buffing dust that was not hazardous, toxic, flammable, reactive, corrosive or otherwise a hazardous substance.
- f.)
 - i. This operation ended in the mid-eighties and no records indicating waste being sent to the Site or volume of waste generated exist.
 - ii. No records exist indicating waste being sent to the Site nor frequencies of disposal.
 - iii. Some of the dust was sold to vendors who reused it in products such as bowling balls. Some of it was reused internally and some of it was taken away by waste haulers but no records exist showing delivery of the waste to the Site.
- g.)
 - v. "a lot of rubber waste" could be rubber dust from sanding operations or cured rubber flashings from press operation.
 - vi. Chemical composition would be: styrene butadiene rubber – nitrile butadiene rubber – natural rubber.
- h.)
 - i. The 50-yard box would typically be used to take the dust described in (e. ii to v)
 - ii. The 50-yard compactor would be the primary collection point for non hazardous waste such as cardboard, wood, spent containers (bags, boxes or drums), floor sweepings from Rubber Division only, rubber scrap (burnt batches, cured flashing, and cured rubber chunks) and burnt plastic batches (batches overmixed during processing).
 - iii. No records exist showing disposal to the Site.

- i.)
 - i. Chemical composition of black dust would be: styrene butadiene rubber – nitrile butadienne rubber – natural rubber.
 - ii. This term is unknown to Teknor Apex
 - iii. Same as ii.
 - iv. Same as ii.
 - v. Same as ii.
 - vi. Same as ii.
- j.)
 - i. To the best of our knowledge Teknor Apex has never processed any materials containing Cyanide. We did dispose of spent bags from a vendor named American Cyanimid but it was not Cyanide.
 - ii. No way to determine accurately from such a vague description.
 - iii. See (c i).
 - iv. See (i i).
- k.
 - i. 50-cubic yard roll-off box would be the container provided by the waste hauler.
 - ii. Rubber Dust
 - iii. 50-cubic yards.
 - iv. Rubber Dust
 - v. As provided for by waste hauler.
- l.
 - i. 30-cubic yard box would be the container provided by the waste hauler
 - ii. Rubber Dust.
 - iii. Rubber Dust
 - iv. As provided by waste hauler.
- m.
 - i. Same as (k i).
 - ii. Same as (k ii).
 - iii. Same as (k iv).
 - iv. Same as (k v).

n.

i. Ron Sito – jobs and titles

1968 to 1977	Factory Worker	Plastics Division
1977 to 1985	Supervisor, Manager	Solite Division
1985 to 1990	Manager	Hose Division
1990 to 1995	Manager	E.H.S.
1995 to Present	Director	Human Resources

ii. Notes attached as Attachment 1.

iii. Notes attached as Attachment 1.

o.

i through xxi no records available to determine these numbers during the timeframe in question.

p. Items i.,xx,xxi. and xxii. Are products not wastes.

Items ii. to vi. are raw materials used in rubber products – small amounts could be Included in floor sweepings disposed of in main dumpster.

Item vii is a raw material that is reused.

Items viii. to xviii. are raw materials used in plastic products scrap amounts are reused.

Item xix. is used for cleaning and residual amounts are reused.

q. Incomplete at this time, additional response in thirty days.

r.

i. no records indicating volume were kept but the spills referred to are minor spills that occurred during normal operations from handling raw materials. These would be in the area of a few ounces to a few gallons.

ii. no records indicating quantity of Speedi-dri used were kept. Speedi-dri was used only on minor spills of maintenance type fluids. PVC resin would have been used to pick up spills in plastic and hose departments as it could be reused in hose production.

iii. No records exists from the period to determine where the contents of the dumpster were disposed of nor who the waste haulers were.

s. No records exist on the volume but:

i., ii, iii and ix are raw materials used in rubber, any waste would be minimal.

iv. and vi. are raw materials use in plastics, any waste would be reused.

v. most would be reused in boilers some would be disposed of as outlined in (u ii)

vii, viii and x are raw materials used in rubber products – small amounts could be included in floor sweepings disposed of in dumpster.

xi. are reused as raw materials in our Garden Hose operations.

t. Incomplete at this time, additional response in 30 days.

- u.
 - i. burnt rubber batches – put in main dumpster in receiving area for removal to landfill by vendors.
 - ii. same as i.
 - iii. Waste oil stored at warehouse for shipment by waste haulers. Records only go back to early eighties indicate the following:

Carrier	Site
McDonald & Watson	Murphy Waste Oil, Woburn Ma.
East Bay Waste Oil	East Bay Waste Oil
McDonald & Watson	Narragansett Improvement, Prov. R.I.
Sampson Oil	Olsen Greenhouses, Raynham, Ma
Oil Recovery Corp.	Lionetti Oil Recovery Inc., Old Bridge, N.J.
 - iv. unused raw materials – same as i.
 - v. Miscellaneous solvents - stored at warehouse for shipment by waste haulers. Records only go back to early eighties indicate that solvent shipments went to Solvent Recovery Service of New England. These waste solvents were primarily generated from our Soling print operation. It is believed that shipments in 1984 of 25, 80 and 25 drums indicate this material was stored over many years before we disposed of it properly.
 - vi. Filter press cake stored at warehouse for reuse internally into Garden Hose operations.
- v.
 - i. unused raw materials chemical composition would be: carbon black, calcium carbonate, rubber and other unreusables.
 - ii. miscellaneous solvents chemical composition would be: MEK, alcohols and various solvent based printing inks.
- w. i. Through viii no records exist to determine volume.
- x. i. through iv and vi through vii would be disposed of in main dumpster outside of Receiving Department for disposal at landfill as determined by waste hauler.

v, and viii. would be transported by and delivered to as stated in (u iii).
- y. The Information Request Waste Survey was filled out by Diane Dandeneau who is no longer with the company. No records exist that supports any transfer of this material to the site. This was probably an oversight that this entry was not marked by an asterisk.
- z. No records exist regarding the disposal of asbestos during the time period requested.

aa.

- i. Lubricants: Petroleum based lubricants, vacuum pump oils, greases, mineral oils, mineral spirits, paraffinic petroleum oils.
Amounts: Machinery Lubricating Oils: 2000 Gallons (1985)
- ii. Oils: #6 oils, petroleum hydrocarbon oils, soil with #6 oil
Amounts: Oil and Soil-Remediation Waste: 200 cubic yds. In 1985, 75 cubic yards in 1986, 6085 gallons #6 oil/sludge/water in 1986
- iii. Laboratory Waste: Approx. 60% Tetrahydrofuran, 30% Methanol, 10% Others: Methylene Chloride, Carbon Tetrachloride, Isopropanol, Chloroform, Acetone, Toluene.
Amount: 360 gallons (1987-1988)

This information comes from MSDS's and Manifest documents for 1985 -1988

bb.

- i. Lubricants: Vacuum truck - burned for heating
Transported by Samson Oil (MAD07569372) to Olson's Greenhouse, 590 South Street, Raynham, MA (MAD059733378). Approximately 200-400 gal. every 2 months 1986.
- ii. Oils: Vacuum Trucks and roll-offs: Vacuum Trucks transported by Clean Harbors of Kingston, MA (MAD039322250), taken to Clean Harbors of Kingston, MA; 100 Joseph St., Kingston, MA (#6 oil/sludge/water), May - July 1986.
Soil with #6 oil transported by MacDonald & Watson (RID093214260) to Narragansett Improvement Co., 223 Allens Ave., Providence, RI (RID006807911) Manifest stamped "Non-Hazardous in Rhode Island. Accepted for processing at Asphalt Batch Plant", November 1985 and November 1986.
- iii. Laboratory Wastes: 55-gallon drums: 4-55 gallon drums in Aug. 1987, 2 in Aug. 1988, transported by Northeast Solvents Corp. (MAD000604447) to Northeast Solvents Corp., 300 Canal Street, Lawrence, MA.

cc. Explain why the entry for lubricants does not have an asterisk indicating "no documentation supports any transfer of any material to the site".

Unknown. No hardcopy information available. One employee (Robert Berard) does remember Goditt & Boyer picking up waste, but no volumes, destinations or descriptions.

dd. Incomplete at this time, additional response in thirty days.

ee. Incomplete at this time, additional response in thirty days.

ff. Incomplete at this time, additional response in thirty days.

gg. Incomplete at this time, additional response in thirty days.

hh. Incomplete at this time, additional response in thirty days.

ii. Incomplete at this time, additional response in thirty days.

jj. Incomplete at this time, additional response in thirty days.

2 a-c Incomplete at this time, additional response in thirty days.

3 a I – viii. Incomplete at this time, additional response in thirty days.

Attachment 1

IVC
Control
System

AK
Proactive

Change
1/6/87

APPENDIX B RESPONSES TO QUESTIONS 4 - 8 FOR 505 CENTRAL AVE.

17
water supply

swat
Munich

Si
Confidential

9

0631-0222

TA00804

JM Mills Site Information Request for the Time Period of 1954 to 1986

Question 4 Compliance with This Request

Name (i)	Current Position (ii)	Job Title during period of investigation (iii)	Job Description	Current or past employee (iv)
Ronald Sito	Personnel Manager	Rubber operator. Hose Dept Manager	manufactured rubber products; managed hose manufacturing operation	Current
Arthur Laroch	Maintenance Oiler	Plastics Diecr Operator. Bagger Leadman. Mill Leadman	manufactured plastic compounds; oversaw manufacturing process as leadman	Current
John Grimaldi	Maintenance Porter	Rubber Banbury Operator. Mill Operator. Compounder. Leadman	manufactured rubber compounds; oversaw manufacturing process as leadman	Current, retiring on 3/15/99
Edward Lapati	Rubber Production Supervisor	Rubber Banbury Operator. Leadman. Supervisor	manufactured rubber compounds; oversaw manufacturing process as leadman and supervisor	Current
Arthur LePerche	Retired	Plasticizer Operator. Plasticizer Manager (at Mendon Avenue)	manufactured plasticizer at Mendon Avenue site	Retired

what is this?

- v. Divisions for which records were reviewed: Teknor Apex Company *waste related to waste handling at the facility*
- vi. The nature of the written documents reviewed are ~~written notes~~ bills of lading, manifest documents, and ~~written notes~~. These documents date back to 1980. Written records dated 1980 through 1986 were reviewed. These were compiled by Ron Sito of Teknor Apex (former Safety and Environmental Manager - refer to section 7).
- vii. These records were kept in Environmental Manager's Office.
- viii. These records are currently kept in the Environmental Manager's Office.

0631-0223

TA00805

Question 5 Generation of Waste During Time of Disposal

- a) Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861

Teknor Apex Company
90 Mendon Road
Pawtucket, RI 02861

b)

following is a list of processes - representative of facilities now etc. purchase of facilities assets... 1983. floor side

Process	Commenced	Ceased	Location
Rubber Compounding (Tread Rubber)	1954 6/4	1993	505 Central Ave.
Rubber Compounding & Molding (Blocks)	1954 6/4	present operation	505 Central Ave.
Rubber Molding (Mats)	1977	present operation	505 Central Ave.
Rubber Compounding (Solite - shoe soling)	1954 6/4	1984	505 Central Ave.
Plastics Compounding (PVC)	1954 6/4	present operation	505 Central Ave.
Garden Hose Manufacturing	1954 6/4	1992	505 Central Ave.
Telcar (sheet rubber) Molding	1980	present operation	505 Central Ave.
Manufacturing of chemical additives for plastics compounds	1952 6/4	1965	90 Mendon Rd.
Wire Coating Material Manufacturing	1965	1970	90 Mendon Rd.

c)

only 90's

Process	Changes in operation
Rubber Compounding (Tread Rubber)	Production moved to Tennessee plant in 1993.
Rubber Compounding & Molding (Blocks/ Mats)	Production increased in these areas with the deletion of other products.
Rubber Compounding (Solite - shoe soling)	Production ceased in 1984. <i>11/1/84</i>
Plastics Compounding (PVC)	3 production lines through 1960, 4 lines through 1962, 5 lines through 1980, 6 lines through 1986 with the addition of a line which manufactured non-toxic, medical grade PVC. <i>11/1/84</i>
Garden Hose Manufacturing	Production moved to Tennessee plant in 1993. <i>9/4</i>
Telcar (sheet rubber) Molding (TPE) <i>(compounding on Telcar)</i>	Began in Plastics department; changed to Rubber department in 1984.
Manufacturing chemical additives for plastics compounds	Production moved to Massachusetts plant.
Wire Coating Material Manufacturing	Production ceased in 1970.

other facilities 1984

-Cedarville - 1759

and 1759

0631-0224

TA00806

PETERSON PURITAN
OPERATING UNIT 2
SITE FILE

CONFIDENTIAL INFORMATION REDACTED.

[SEE CONFIDENTIAL FILE(S) FOR ADDITIONAL INFORMATION]

Note: This is a sio sheet. Please do not apply document number labels to this sheet.

TA00807

Burnt PVC Batch:	none	Plastic Department	Dumpster in Receiving Department
Waste oil	drum	Plastic Department	Warehouse at Mendon Ave
Unused raw materials	various - bags, metal drums, cardboard drums	Each department	Dumpster in Receiving Department
Miscellaneous Solvents	drums	Rubber Department Mendon Avenue	Drums stored at Mendon Avenue
Filter Press Cake	metal drums	Mendon Avenue	Mendon Avenue

⇒ *repeat 72 here

Question 7 Respondents Disposal/Treatment/Storage/Recycling/Sale of Waste

a) Identify persons who currently have and those who have been responsible for disposal of waste

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Diane Dandeneau	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x780	[REDACTED]	Teknor Apex Company, Environmental Manager	
Ronald Siro	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x281	[REDACTED]	Teknor Apex Company, Safety and Environmental Manager	

b) There are many persons who currently have and/or have had knowledge of the disposal of waste. Those questioned for this information request are listed below:

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Arthur Larouche	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000		Teknor Apex Company, Maintenance Oiler	
John Grimaldi	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000		Teknor Apex Company, Maintenance Porter	
Arthur LaPerche	Retired	[REDACTED]	Teknor Apex Company, Plasticizer Production Manager (1985-1970)	

c) Persons currently having and those who have had responsibility for Environmental Affairs

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Diane Dandeneau	505 Central Avenue Pawmucket, RI 02861 (401) 725-8000x281	[REDACTED]	Teknor Apex Company. Environmental Manager. 10/97 - present	
Laura Salamy (former employee)	Precision Art and Pac Glass, Inc. 22 Almeida Ave. East Providence, RI 02914 (401) 435-9800			
Tim Condy (former employee)				
Ronald Sito	505 Central Avenue Pawmucket, RI 02861 (401) 725-8000x281		Teknor Apex Company. Safety and Environmental Manager, 1990-1995	

John Meo-IA

d)

Name	Job Title with dates	Supervisor	Current Position	What type of information is possessed?
Diane Dandeneau	Environmental Manager	Christopher ReCasino	same	overall plant environmental knowledge (present)
Ronald Sito	Rubber operator. Hose Dept. Manager. Safety and Environmental Manager (1990-1995). Personnel Manager (1995-present)	Paul Debanowicz Christopher ReCasino	Personnel Manager	general plant production and environmental knowledge (1968 - present)
Arthur Laroach	Plastics Diecr Operator. Bagger Leadman. Mill Leadman. Med Line Operator. Maintenance Oiler	Donald Brown	Maintenance Oiler	PVC manufacturing and maintenance experience (1962 - present)
John Grimaldi	Rubber Banbury Operator. Mill Operator. Compounder.		Maintenance Porter	Rubber manufacturing and maintenance experience (1963 - present)

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TA00809

	Leadman, Maintenance Porter	Mark Eddelston		
Arthur L. Perche <i>Perche</i>	Plasticizer Operator, Plasticizer Manager <i>Plasticizer Supervisor</i>		Retired	Knowledge of Plasticizer production in Mendon Avenue from 1952-1970.

Waste Name	Type of Container Stored in	Description of Container	Used Container Prior Use
Burnt Rubber Batches	none	not applicable	not applicable
Burnt PVC Batches	none	not applicable	not applicable
Waste oil	drum	metal drums, most likely black	waste oil
Unused raw materials	various - bags, metal drums, cardboard drums	used cardboard drums were typically blue	Pigment raw materials
Filter Press Cake	metal drums	metal drums, most likely black	unknown

* 72
Records date back to 1980 only. Therefore, information contained below is based on records from 1980 - 1986.

Waste Name	Where Disposed of (r & h)	Who Carried it (i,j,k)	What was the Frequency of Shipment (l)	What was the Volume of Shipments (m)	Dates from and to material was shipped (n)
Waste Oil (manifested)	a) Murphy Waste Oil Woburn, MA b) Narragansett Improv. Co. Providence, RI	McDonald & Watson	Twice per year from 1980 - 1985		
Waste Oil (manifested)		East Bay Waste Oil	Once in 1986		
Waste Oil (manifested)	Olsen Greenhouses Raynham, MA	Sampson Oil	once in 1986	1800	11/13/86
Waste Oil (manifested)	Lionetti Oil Recovery, Inc. Old Bridge, NJ	Oil Recovery Corporation	once in 1986	1800	12/12/86
Waste Solvents	Solvent Recovery Service of New England	same	Three times in 1984	25.80, and 24 drums MEK, alcohols, misc	3/84, 6/84, 6/84

* 72 respond.

0631-0229

TA00810

				solvents	

- o) Copies of Manifests or Bills of Lading - see attached.
- p) No knowledge of types of vehicles used.
- q) No knowledge of carrier's employees except for names on manifest documents from 1980 to 1986.
- r) Listed in table in section f. Ultimate disposal assumed to be same location.
- s) Listed in table in section f. Ultimate disposal assumed to be same location.
- t) Information on how TA managed waste pickups is unknown.
- u) Information unknown.
- v) Information unknown.
- w) This information is unknown. Dry material may have been washed into drains which ultimately flowed into the POTW.
- x) The Blackstone Valley District Commission
102 Campbell Avenue
East Providence, RI 02916
at present: The Narragansett Bay Commission
235 Promenade Street
Providence, RI 02908
- y) See Waste Survey.
- z) No documentation supports transfer of material to "The Site"

→
BOLD

Question 8 - Respondent's Environmental Reporting

- a) Central Avenue: RID045367968
Mendon Avenue: RID987480357
- b) None
- c) Not applicable
- d) Rhode Island Department of Environmental Management
Division of Air and Hazardous Materials
Room 204 Cannon Building
Providence, RI 02908

0631-0230

TA00811

Rhode Island Department of Environmental Management
Division of Air and Hazardous Materials
75 Davis Street
Providence, RI 02908

Rhode Island Department of Environmental Management
Division of Waste Management
291 Promenade Street
Providence, RI 02908

- c) 1985-present
- f)
 - 1) Emergency Planning and Community Right to Know Act, 42 U.S.C. 1101 (EPCRA)
 - 2) SARA Section 313 Title III - Form R Reporting
 - 3) RI Air Pollution Control Regulations
 - 4) Resource Conservation and Recovery Act, Title 40 CFR Parts 260 - 279
 - 5) RI Rules and Regulations for Hazardous Waste Management
 - 6) Rules and Regulations for The Use Of The Wastewater Facilities Within The Narragansett Bay Water Quality Management District
 - 7) SARA Title III, Section 312, Tier II

- g) EPCRA Reporting Center
PO Box 3348
Merrifield, VA 22116

RI Department of Environmental Management
Division of Air Resources
235 Promenade Street
Providence, RI 02908

The Narragansett Bay Commission
235 Promenade Street
Providence, RI 02908

State Emergency Response Commission
c/o Department of Labor and Training
Division of Occupational Safety
610 Manton Avenue
Providence, RI 02909
City of Pawtucket
Fire Prevention Office
155 Roosevelt Avenue
Pawtucket, RI 02760

LEPC District 4
Pawtucket Fire Department
145 Roosevelt Avenue
Pawtucket, RI 02760

1)

0631-0231

TA00812

50 Reuten ¹⁰⁵ Manufacturing Company
Plastics - 3 lbs to 1 lb - 4 lbs to 1 lb
Salite - 1 lb to 1 lb - 1 lb to 1 lb
 51 Hose - 1 lb to 1 lb - 1 lb to 1 lb

John F. Smith
 2 - State of Alaska
 PE)

Median - ~~statistical~~ ^{Aspirin}
(TPE)

Alpaca
masterbatch - white flock
atomate
plastazene
carbon black
yellow pigment
silica
accelerators
grease -

Dumetia -
- large lilies - 70 ft. tall
- *M. p.* - large
- small *m. p.* - very

TA000813

Proctor - ~~harrow~~ - says
better
solidity used / to
drip

20 gal/hr → 20 gal/hr
R

Spill Materials

plastic bags used resin → weyle
etc. feed day → dumper

Auto City

Just stop! recycled

John 1220

Ken Site

Bill Cantowitz

Paul Dubowitz

Ben Khan

Bill Duarte - Public, Dipl.

burns
dumpster
blue sand and sea
blow

18 yrs ago separated
oil / sudge deprosa

E. M. 1975

0631-0234

TA00815

[Faint, illegible handwritten text, possibly bleed-through from the reverse side of the page]

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TA00816

Arthur Calcutt 34 Haybury St
37-339 Dunblair 1935 1960
2804

Leppene
W. Leppene
all
Mortals

DI-10
CRS. Calce

2. 107, 21

mainly dark
yellowish grey
yellowish
brownish

settling tank oil/water
open till until oil
refuses oil → VRP
cheaper plastic

7 tanks
dormitory tank room

AW - peak material → 1965 - 1970
nickel

spill → train


TEKNOR APEX COMPANY
PAWTUCKET, RHODE ISLAND 02861-1900

CERTIFIED MAIL



7001 0360 0003 1669 9883

**RETURN RECEIPT
REQUESTED**

David J. Newton
Remedial Project Manager
US Environmental Protection Agency
PO Box 6329
Boston, MA 02114-2023

N/C
4-1

0631-0237

TA00818



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

37897

SITE:	Peterson/Puritan
BREAK:	11.9
OTHER:	602

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

February 21, 2002

David F. Yopak
Director of Environmental, Health and Safety
Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861-1900

Re: **Notice of Potential Liability and Request for Information** Pursuant to Section 104 of CERCLA at Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill in Cumberland, Rhode Island.

Dear Mr. Yopak:

This letter serves to formally notify Teknor Apex Company of the potential liability which it has or may have incurred with respect to Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill, in Cumberland, Rhode Island ("Site"). In addition, this letter requests that you pay certain costs related to the Site and that you prepare to participate in the conduct or financing of certain clean-up activities at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Site.

NOTICE OF POTENTIAL LIABILITY

The United States Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants or contaminants at the Site.

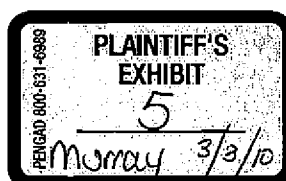
Under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9606(a) and 9607(a) ("CERCLA"), and other laws, responsible parties may be obligated to undertake actions deemed necessary by EPA to protect the public health, welfare or environment. Responsible parties may also be liable for all costs incurred by the government in responding to any release or threatened release at the Site. Such costs may include, but are not limited to, expenditures for investigation, planning, clean-up response and enforcement activities. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the costs to assess such damages.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

0631-0242



TA00819

Responsible parties under CERCLA include persons who are current or former owners and/or operators of a site, persons who arranged for disposal of hazardous substances at a site, or persons who accepted hazardous substances for transport to a site selected by such persons. EPA has evaluated a large body of evidence in connection with its investigation of the Site, including Site business records, manifests, state records, and corporate records. Based on this evidence, EPA has information indicating that you are a potentially responsible party ("PRP") with respect to this Site. Specifically, EPA has reason to believe that you arranged by contract, agreement or otherwise for disposal or treatment, or arranged with a transporter for transport for disposal or treatment of hazardous substances found at the Site.

By this letter, EPA notifies you of your potential liability with regard to this matter. EPA also encourages you, as a PRP, to reimburse EPA for the costs incurred to date as set out below. At the present time, CCL Custom Manufacturing, Inc. ("CCL") is under an obligation to perform all of the work for the Remedial Investigation and Feasibility Study ("RI/FS") and Bestfoods is under an obligation to finance the RI/FS at the Peterson/Puritan Site through a July 13, 2001 Second Amendment to the Administrative Order on Consent ("Second Amendment"). EPA encourages you to voluntarily enter into discussions with CCL and Bestfoods and to cooperate and participate with CCL and Bestfoods in the performance of the RI/FS at the Site.

DEMAND FOR PAYMENT OF COSTS

In accordance with CERCLA and other authorities, EPA has undertaken certain actions and incurred costs in response to conditions at the Site. These response actions are described below. The costs to date associated with these actions are approximately **\$762,131.45**, excluding interest. EPA anticipates that it will expend additional funds for response activities at the Site under the authority of CERCLA and other laws, including those response activities described below.

In accordance with Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), a demand is hereby made for payment of the above amount, and all interest authorized to be recovered under that Section or under any other provisions of law. Demand is also hereby made under these authorities for payment of all future costs, and interest thereon, that EPA may accrue in regard to the Site.

In the event the addressee of this notice intends or has already filed for dissolution or reorganization under bankruptcy laws, you are hereby requested to include EPA-Region I, and the United States Department of Justice on any mailing or notice lists used in that proceeding. The United States reserves the right to file a proof of claim or application for reimbursement of administrative expenses in such a proceeding.

Contained in Enclosure D of this letter is a current summary of the costs expended for this Operable Unit of the Site. As you may be aware, PRPs are entitled to review the invoices which form the basis for EPA's past costs. Some of these documents may contain information that EPA's contractors claim is entitled to confidential treatment. The Agency's past practices has been to obtain the consent of the contractors pursuant to 40 C.F.R. 2.209(f) (confidential business information regulations) before releasing this information to PRPs. These regulations,

0631-0243

TA00820

however, have been revised to allow information on past costs to be released provided that the interested party sign a Confidential Business Information Agreement ("Agreement") not to disclose this information.

This Agreement is necessary to protect the interests of the submitters in the confidentiality of the business information. No party is under any obligation to execute this Agreement. Without executing this Agreement, however, the Agency cannot release documentation on past costs. If you are interested in reviewing these documents, please contact the Peterson/Puritan, Inc. Superfund Information Line ("Information Line") at 617-918-1177. The Information Line was developed by EPA to ensure that both your general and specific questions would be handled in a timely and consistent manner. Please leave a detailed message and we will make every effort to return your call within two business days.

INFORMATION REQUEST

EPA is continuing with its investigation into the release or threatened release of hazardous substances, pollutants, and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to undertake or finance that cleanup.

Pursuant to the authority of Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in Enclosure A to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within thirty (30) days of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to twenty-seven thousand five hundred dollars (\$27,500) for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

RESPONSE ACTIVITIES AT THE SITE

EPA has already conducted the following activities at the Site:

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TA00821

1. A time-critical removal action in response to tanks, still bottoms and drums located at the Site and to restrict access to the Site in the construction of a fence; and
2. A time-critical removal action in response to asbestos disposal and fence repair.

EPA is planning to conduct the following activities at the Site:

1. Remedial Investigations to identify the local characteristics of the Site and to define the nature and extent of soil, air, surface water and ground water contamination at the Site;
2. Feasibility Studies to evaluate the feasibility of possible remedial actions to remove or contain hazardous substances, pollutants and contaminants at the Site;
3. Design and implementation of a Remedial Action for the Site to be approved by EPA; and
4. Operation, maintenance and monitoring of the Site as deemed necessary by EPA.

In addition to those enumerated above, EPA may, pursuant to its authorities under CERCLA and other laws, decide that other response activities are necessary to protect public health, welfare or the environment.

SPECIAL NOTICE AND NEGOTIATION MORATORIUM

At an appropriate point in the future, you will receive an additional notice informing you that one or more of the above activities is pending and that your cooperation is being requested to negotiate the terms of an agreement to perform or finance these activities.

This forthcoming notice will serve to inform you that EPA is using either CERCLA Section 122(e) Special Notice procedures to formally negotiate the terms of a consent order or consent decree to conduct or finance site response activities at the site or it will inform you that EPA is not using such procedures pursuant to Section 122(a). If EPA does not use Section 122(e) Special Notice procedures, the Section 122(a) notice will explain why the Special Notice procedures were not appropriate in this case. Under Section 122(e), EPA has the discretionary authority to invoke Special Notice procedures if EPA determines that such procedures would facilitate an agreement between EPA and the PRPs and would expedite remedial action at the site. Use of the Special Notice procedure triggers a moratorium on certain EPA activities at the site. The purpose of the moratorium is to provide a period of time when PRPs and EPA may enter into formal negotiations allowing PRPs the opportunity to conduct or finance the response activities at the Site.

ENCLOSURE INFORMATION

0631-0245

TA00822

- Information Request Questions for Operable Unit 2 of the Peterson/Puritan, Inc. Superfund Site, which includes the J. M. Mills Landfill in Cumberland, Rhode Island, hereafter referred to as the "Site". (*Enclosure A*)
- A description of the Site, specifically Operable Unit 2 which includes the J. M. Mills Landfill. (*Enclosure B*)
- A list of the names and addresses of potentially responsible parties to whom this notification was provided. This list represents EPA's preliminary findings on the identities of potentially responsible parties. EPA's responsible party search is continuing. Inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for the hazard or contamination at the Site. (*Enclosure C*)
- A current Site Cost Summary for OU 2. (*Enclosure D*)
- An Information Sheet for Small Businesses. (*Enclosure E*)
- Various documents pertaining to Teknor Apex which should assist you in answering some of the information request questions. (*Attachments 1 through 8*)

PRP Steering Committee:

EPA recommends that all PRPs meet to form a PRP steering committee which will function as a group representing and pursuing the interests of the PRPs. Establishing a manageable group is a critical component of the negotiation process. To facilitate negotiations at an appropriate time in the future, EPA will conduct a meeting with responsible parties. At the meeting, EPA will detail the existing knowledge about conditions at the Site and describe the past response activities that have been taken at the Site to date. Since there may be a large number of PRPs, EPA may request that the individual persons or company representatives who attend the meeting appoint a committee to represent them in negotiations.

Administrative Record

In accordance with Section 113(k) of CERCLA, EPA must establish an administrative record containing the documents used by EPA to select the appropriate response action for the Site. An administrative record for Operable Unit 1 of the Site has been previously established. An administrative record for Operable Unit 2 of the Site will also be established. The administrative record will be available to the public for inspection and comment at:

EPA Records Center
1 Congress Street
Boston, MA 02114-2023
Telephone No. 617-918-1440

0631-0246

TA00823

Another copy of the administrative record will also be made available at the Cumberland Public Library at 1464 Diamond Hill Road in Cumberland, Rhode Island.

TIMING AND FORM OF RESPONSE TO THIS LETTER

In addition to your continued obligations with respect to the ongoing Information Request, you as a potentially responsible party, should notify EPA in writing within twenty-one (21) days from receipt of this letter regarding your willingness to perform or finance the response activities described above. If EPA does not receive a timely response, EPA will assume that your company does not wish to negotiate a resolution of its liabilities in connection with the Site and that your company has declined any involvement in performing the response activities.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action, or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions.

Your response letter should be sent to:

David J. Newton
Remedial Project Manager
U.S. Environmental Protection Agency
P.O. Box 6329
Boston, MA 02114-6329

If you have general questions concerning the Site, please contact David Newton at the above address. If you have any legal questions relevant to the Notice of Liability, the ongoing obligation to the Information Request, or if your attorney wishes to communicate with EPA on your behalf, please contact Michelle Lauterback, Enforcement Counsel, U.S. Environmental Protection Agency, 1 Congress Street, Suite 1100 (SES), Boston, MA 02114-2023, or you may call the Information Line at 617-918-1177 and your call will be returned.

The factual and legal discussions in this letter are intended solely to provide notice and information, and such discussions are not to be construed as a final agency position on any matter set forth herein. Due to the seriousness of the environmental and legal problems posed by conditions at the Site, EPA urges that immediate attention and a prompt response be given to this letter.

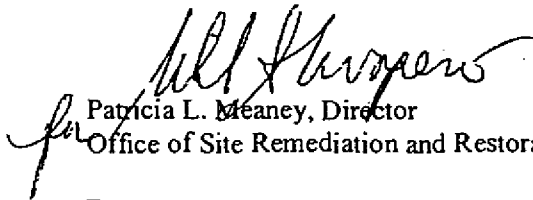
By copy of this letter, EPA is notifying the State of Rhode Island and the Federal Natural Resource Trustees of our intent to perform or enter into negotiations for the performance or financing of response actions at the Site.

0631-0247

TA00824

Thank you for your cooperation in this matter.

Sincerely,


Patricia L. Meaney, Director
Office of Site Remediation and Restoration

Enclosures

cc. Bruce Marshall, Chief, Superfund Enforcement Support Section
Michelle Lauterback, EPA Office of Environmental Stewardship
✕ David J. Newton, EPA Remedial Project Manager
Louis R. Maccarone, RIDEM Project Manager
Meg Curran, Office of Rhode Island Attorney General
Leo Hellested, Office Waste Management, RI Dept. of Environmental Management
Andy Raddant, DOI, US Fish and Wildlife Service, Federal Natural Resource Trustee
Ken Finkelstein, NOAA, Federal Natural Resource Trustee

0631-0248

TA00825

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

_____ and that the foregoing is complete, true, and correct.
Respondent

Executed on _____, 20__

Signature

Type Name

Title [if any]

Please complete and return this form with your responses to the Information Request

0631-0249

TA00826

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ENCLOSURE A

Information Request Questions

0631-0250

TA00827

INFORMATION REQUEST FOR
Operable Unit Two at the
Peterson/Puritan, Inc. Superfund Site
Cumberland, Rhode Island

Period Being Investigated: 1954-1986

In addition to the questions which follow, this enclosure includes a declaration, detailed instructions for responding to this request, and definitions of words such as "Respondent," "identify," "waste," and "asset" used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- Complete the enclosed declaration.
- For each question, identify all persons and documents relied upon in the preparation of the answer.
- All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.
- This request imposes a continuing obligation upon you to submit responsive information discovered after your original response is submitted to EPA.
- Please refer to Attachments 1 through 8 to assist with responses to the Information Request.

INFORMATION REQUEST QUESTIONS

1. Information or Knowledge of Waste Delivered to the J.M. Mills Landfill:

NOTE: In response to the January 11, 1999 Information Request you indicated that you had no documentation to support any transfer of any material to the J.M. Mills Landfill (also referred to as "Mills" or "the Landfill") in Cumberland, RI. Please see the attached documentation, which specifically demonstrates that Goditt & Boyer picked up hazardous substances from Teknor Apex and disposed of it at the Landfill. Please indicate in your responses to the individual questions below whether this evidence refreshes the memory of anyone interviewed in preparation for this response or the January 11, 1999 CERCLA Section 104(e) information request. Please provide any and all documents in your possession, custody or control that pertain to, in any way, this supplemental CERCLA Section 104(e) request or the January 11, 1999 CERCLA Section 104(e) request.

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

a. Please refer to Attachment #1, a June 8, 1978 letter from Teknor Apex to Rhode Island Department of Environmental Management, regarding concerns about possible closure of the Landfill. Please define and explain the following:

- i. "industrial waste";
- ii. the "burden in the disposition of our industrial waste";
- iii. which Teknor Apex facilities used the Landfill;
- iv. the kinds of "industrial waste" generated by each Teknor Apex facility;
- v. frequency of disposal at the Landfill by each Teknor Apex facility;
- vi. which transporter(s) hauled waste to the Landfill from each Teknor Apex facility; and
- vii. number of years each Teknor Apex facility used the Landfill.

b. For the following questions, please refer to Attachment #2, which contains Goditt & Boyer's Carrier Survey. Please refer specifically to the entry for Driver No. 1. Please define and explain:

- i. the chemical composition and characteristics of "rubber dust";
- ii. what types of chemicals in rubber dust or powder would emit odor and "ignite easily";
- iii. types of waste contained in the 6-yard boxes; and
- iv. disposal methods and frequency of the waste contained in the 6-yard boxes.

c. Please refer to the entries for Driver No. 2. Please define and explain the chemical composition and characteristics of the following:

- i. rubber chunks;
- ii. sweepings;

- iii. powder waste, contained in 55-gallon fiber drums; and
 - iv. light brown and darker fine powdery dust.
- d. Referring again to the entries for Driver No. 2, please explain what is meant by the "Apex Dust Stop," referred to by some drivers.
- e. Please describe the nature of the waste generated at the "Apex Dust Stop," referred to by Goditt & Boyer Driver No. 2, including but not limited to:
- i. the name of each type of waste;
 - ii. the chemical composition of the contents of each type of waste;
 - iii. the color of each type of waste;
 - iv. the odor of each type of waste; and
 - v. whether each type of waste was hazardous, toxic, flammable, reactive, corrosive, or was otherwise a hazardous substance.
- f. With regard to the waste from the "Apex Dust Stop," please further describe the following:
- i. the volume of waste generated;
 - ii. the frequency of waste disposal; and
 - iii. the method of disposal of the waste.
- g. Please refer specifically to the entry for Driver No. 3. Please define and explain the following:
- i. what is contained in "a lot of rubber waste"; and
 - ii. the chemical composition and characteristics of "rubber waste."
- h. Referring to the entries for Drivers No. 2 and 3, please describe the following:
- i. the contents and chemical composition of the 50-yard box;
 - ii. the contents and chemical composition of the 50-yard compactor box; and
 - iii. the methods of disposal for each type of container used including, but not limited to, drums, cartons, pails, tanker trucks, packer trucks, roll-off trucks, and pickup trucks.
- i. Please refer specifically to the entry for Driver No. 4. Please define and explain:
- i. the chemical composition and characteristics of "black dust";
 - ii. what is meant by an 8-yard "f/e box";
 - iii. the contents the "f/e box" would hold;
 - iv. the volume of the "f/e box";
 - v. the types of waste the "f/e box" would hold; and
 - vi. the methods of disposal the waste in the "f/e box".
- j. Please refer specifically to the entry for Driver No. 5. Please define and explain the chemical composition and characteristics of the following materials:
- i. residue amounts of cyanide, contained in numerous powder bags;
 - ii. loose powder;

- iii. rubber chunks, contained in cardboard drums; and
 - iv. large amounts of black dust.
- k. Referring again to the entry for Driver No. 5, please describe and explain:
- i. what is meant by a 50-yard "roll-off box";
 - ii. the contents the "roll-off box" would hold;
 - iii. the volume of the "roll-off box";
 - iv. the types of waste the "roll-off box" would hold; and
 - v. the methods of disposal the waste in the "roll-off box".
- l. Please refer specifically to the entry for Driver No. 6. Please describe and explain:
- i. what is meant by a 30-yard box;
 - ii. the contents the 30-yard box would hold;
 - iii. the types of waste the 30 yard box would hold; and
 - iv. the methods of disposal the waste in the 30-yard box.
- m. Referring again to the entry for Driver No. 6, please describe and explain:
- i. what is meant by a 50-yard box;
 - ii. the contents the 50-yard box would hold;
 - iii. the types of waste the 50 yard box would hold; and
 - iv. the methods of disposal the waste in the 50-yard box.
- n. In Teknor Apex's March 5, 1999 response, you state that written documents regarding waste handling date back only as far as 1980. According to your response to Question 7(b) (please see Appendix B of the response, included as Attachment #3), Ronald Sito possesses information dating back to 1968. Therefore, please provide the following, with regard to the entire period of investigation:
- i. jobs and job titles, with corresponding dates, for Ronald Sito over the course of his employment with Teknor Apex;
 - ii. summaries of interviews, conducted in preparation of the March 5, 1999 response and/or this response, with Ronald Sito; and
 - iii. summaries of interviews with any other employee conducted in preparation of the March 5, 1999 response and/or this response, including but not limited to: Arthur Laroache; John Grimaldi; Arthur LaPerche; Herb Malin; Diane Dandeneau; Laura Salamy; Tim Coady; and Edward Lapati.
- o. The following questions refer to 505 Central Avenue. Please see Appendix B of Teknor Apex's March 5, 1999 information request response, included as Attachment #3. Please refer specifically to the responses to Questions 5(b), (c), (e), and (g), and describe the volumes of waste generated from each Teknor Apex facility, including but not limited to the following:
- i. rubber blocks;
 - ii. zinc stearate;
 - iii. carbon black;

- iv. sulfur;
- v. accelerators;
- vi. fillers;
- vii. oils;
- viii. PVC resin;
- ix. calcium carbonate;
- x. plasticizers;
- xi. colorants;
- xii. lead compounds;
- xiii. stabilizers;
- xiv. C₄-C₁₃ alcohols;
- xv. phthalic anhydride;
- xvi. organic acids;
- xvii. sulfonic acid;
- xviii. filter aides (clay);
- xix. thermoplastic elastomer (TPE);
- xx. Solite; and
- xxi. OGAP (Off Grade Alcohol Phthalates).

p. Please see Appendix B of Teknor Apex's March 5, 1999 information request response, included as Attachment #3. Please refer specifically to the responses to Questions 5(b), (c), (e), and (g), and describe the waste handling practices for the following materials, including but not limited to how the waste was stored, which transporter(s) hauled each waste, and the types of containers used to haul the following types of waste:

- i. rubber blocks;
- ii. zinc stearate;
- iii. carbon black;
- iv. sulfur;
- v. accelerators;
- vi. fillers;
- vii. oils;
- viii. PVC resin;
- ix. calcium carbonate;
- x. plasticizers;
- xi. colorants;
- xii. lead compounds;
- xiii. stabilizers;
- xiv. C₄-C₁₃ alcohols;
- xv. phthalic anhydride;
- xvi. organic acids;
- xvii. sulfonic acid;
- xviii. filter aides (clay);
- xix. kerosene;
- xx. thermoplastic elastomer (TPE);
- xxi. Solite; and
- xxii. OGAP (Off Grade Alcohol Phthalates).

q. Please refer to Appendix B of Teknor Apex's March 5, 1999 information request response, included as Attachment #3, and refer specifically to the responses to Questions 5(e) and (g). Please provide the chemical composition (either the product name or chemical name) and the use for the following:

- i. accelerators;
- ii. fillers;
- iii. oils;
- iv. PVC resin;
- v. plasticizers;
- vi. colorants;
- vii. stabilizers;
- viii. C_4-C_{13} ;
- ix. organic acids; and
- x. filter aides (clay).

r. Please see Appendix B of Teknor Apex's March 5, 1999 information request response, included as Attachment #3. Please refer specifically to the response to Question 5(h). Please explain and describe the following:

- i. the volume of oil spilled;
- ii. the quantity of Speedi-dri used to absorb spilled oil; and
- iii. how the contents of the Dumpster were disposed, including which waste hauler removed the contents.

s. Please refer to the response to Question 6(b) of Attachment #3. Please provide volume of waste disposed of for each of the following:

- i. styrene butadiene rubber;
- ii. nitrile butadiene rubber;
- iii. natural rubber;
- iv. PVC;
- v. maintenance oil (including but not limited to gear oil, motor oil, gasoline, and lube oil);
- vi. plasticizers;
- vii. carbon black;
- viii. calcium carbonate;
- ix. rubber;
- x. unrecyclables; and
- xi. various solids generated in the manufacture of plasticizer.

t. Referring again to the response to Question 6(b) of Attachment #3, please describe the content and chemical composition of the following:

- i. unrecyclables; and
- ii. various solids generated in the manufacture of plasticizer.

u. Referring again to the response to Question 6(b) of Attachment #3, please explain and describe the methods for removal, including waste haulers, of waste from containers including Dumpsters and drums for the following materials:

- i. burnt rubber batches;
- ii. burnt PVC batches;
- iii. waste oil;
- iv. unused raw materials;
- v. miscellaneous solvents; and
- vi. filter press cake.

v. Referring again to the response to Question 6(b) of Attachment #3, please describe the content and chemical composition of the following:

- i. unused raw materials; and
- ii. miscellaneous solvents.

w. Please refer to the Information Request Waste Survey for 505 Central Avenue, included in Attachment #4. For following types of waste, please provide the volume of waste disposed of:

- i. adhesives/block glues;
- ii. asbestos;
- iii. absorbents/Speedi-dri;
- iv. chemicals (carbon black, solid);
- v. lubricants (grease, hydraulic fluid);
- vi. paint and coating wastes;
- vii. rags used for cleaning with kerosene; and
- viii. waste oils.

x. Referring to the Information Request Waste Survey for 505 Central Avenue, included in Attachment #4, please describe waste handling practices for the following materials, including, but not limited to, the method of disposal and transporter(s) used:

- i. adhesives/block glues;
- ii. asbestos;
- iii. absorbents/Speedi-dri;
- iv. chemicals (carbon black, solid);
- v. lubricants (grease, hydraulic fluid);
- vi. paint and coating wastes;
- vii. rags used for cleaning with kerosene; and
- viii. waste oils.

y. Referring again to the Information Request Waste Survey for 505 Central Avenue, included in Attachment #4, please explain why the entry for Asbestos does not have an asterisk indicating that "[n]o documentation supports any transfer of any material to the Site."

z. Referring again to the Information Request Waste Survey for 505 Central Avenue, included in Attachment #4, please describe the methods of disposal for the asbestos, including waste haulers used and frequency of disposal.

aa. Please refer to the Information Request Waste Survey for 330 Oakhill Avenue, included in Attachment #5. Please describe the chemical composition and volume of the following materials:

- i. lubricants;
- ii. oils; and
- iii. laboratory wastes.

bb. Referring to the Information Request Waste Survey for 330 Oakhill Avenue, included in Attachment #5, please describe disposal methods for the following materials, including how and where the Dumpsters were emptied, how often, and by whom:

- i. lubricants;
- ii. oils; and
- iii. laboratory wastes.

cc. Referring again to the Information Request Waste Survey for 330 Oakhill Avenue, included in Attachment #5, please explain why the entry for lubricants does not have an asterisk indicating that "[n]o documentation supports any transfer of any material to the Site."

dd. Please refer to the Information Request Waste Survey for 20 Industrial Road, included in Attachment #6. Please describe the chemical composition and volume of these materials.

- i. absorbents/Speedi-dri;
- ii. powders (solid pigments);
- iii. paint coating and wastes;
- iv. rags used for cleaning; and
- v. solids from recirculated cooling water system cleanout.

ee. Please also describe disposal methods for the following materials which transporter(s) hauled the waste and the frequency of disposal:

- i. absorbents/Speedi-dri;
- ii. powders (solid pigments);
- iii. paint coating and wastes;
- iv. rags used for cleaning; and
- v. solids from recirculated cooling water system cleanout.

ff. Please see confidential attachments that Teknor Apex provided in its information request response dated March 5, 1999, included as Attachment #7. Please define and explain the following:

- i.
- ii.
- iii.
- iv.

gg. Please further describe the disposal methods for the following:

- i.
- ii.

hh. Please describe the handling, production, manufacturing, use and/or disposal of any of the following, at each Teknor Apex facility:

- i.
- ii.
- iii.
- iv.

ii. Please further describe in detail the physical state of the following wastes identified by Teknor Apex as:

- i.
- ii.
- iii.
- iv.
- v.
- vi.
- vii.
- viii.
- ix.

jj. Please further describe in detail the characteristic(s) in solid or semi-solid state (the size and proportion or discrete volume) of the following wastes identified by Teknor Apex as:

- i.
- ii.
- iii.
- iv.
- v.
- vi.
- vii.
- viii.
- ix.

2. Information About Others:

a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site that is not included in the information you have already provided, provide all such information.

b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

3. Compliance with This Request:

a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:

- i. the names of all individuals consulted;
- ii. the current job title and job description of each individual consulted;
- iii. the job title and job description during the period being investigated of each individual consulted;
- iv. whether each individual consulted is a current or past employee of Respondent;
- v. the names of all divisions of Respondent for which records were reviewed;
- vi. the nature of all documents reviewed;
- vii. the locations where those documents reviewed were kept prior to review; and
- viii. the location where those documents reviewed are currently kept.

INFORMATION REQUEST INSTRUCTIONS

1. **Answer Every Question Completely.** You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. **Number Each Answer.** Number each answer with the number of the question to which it corresponds.
3. **Provide Information about the Period Being Investigated.** You are required to answer each question with respect to the period being investigated, unless the question specifically states otherwise. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. **Provide the Best Information Available.** You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. **Identify Sources of Answer.** For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
6. **Submit Documents with Labels Keyed to Question.** For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. **Continuing Obligation to Provide/Correct Information.** If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within 30 days of discovering such responsive information may subject you to \$27,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the company may be subject to criminal prosecution.
8. **Complete the Enclosed Declaration.** You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.
9. **Confidential Information.** The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections

104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. Before asserting a business confidentiality claim, read the above cited regulations carefully because certain categories of information are not properly the subject of such a claim.

10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)

12. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

EPA CONTRACTOR LIST

CONTRACTOR

CONTRACT NUMBER

TechLaw, Inc.

ZES Contract #68-W-99-019

Subcontractors (as of 1/28/99):

Blake Investigative Agency

Northbridge Environmental Management Consultants

Watts Engineers

Susan Podziba & Associates

TechLaw, Inc.

GSA Schedule

#GS-10F-0168J

Booz, Allen & Hamilton

GSA ANSWER Contract

GS09K99BHD0002,

Task ID: R16800391

Arctic Slope Regional Corporation (ASRC) Aerospace

Contract #68-W-01-002

Effective: 11/16/00

Metcalf & Eddy, Inc.

RAC # 68-W6-0042

WA# 105-RSBD-0140

INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents, and any predecessor or successor corporations or companies.

2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:

(a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:

1. invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order;
2. letter, correspondence, fax, telegram, telex;
3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
4. agreement, contract, and the like;
5. log book, diary, calendar, desk pad, journal;
6. bulletin, circular, form, pamphlet, statement;
7. report, notice, analysis, notebook;
8. graph or chart; or
9. copy of any document.

(b) microfilm or other film record, photograph, or sound recording on any type of device;

(c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:

1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and
2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and

(d) attachments to or enclosures with any document as well as any document referred to in any other document.

3. The term "identify" or "provide the identity of" means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with job title, position or business; and (d) the person's social security number.

4. The term "identify" or "provide the identity of" means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g. corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

5. The term "identify" or "provide the identity of" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.

6. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The terms "the period being investigated" and "the relevant time period" shall mean the period being investigated as specified on the first page of the Information Request Questions.

8. The terms "the Site" or "the facility" shall mean and include the property on or about the property locally known as the J. M. Mills Landfill in Cumberland, RI and further identified by EPA as the Second Operable Unit of the Peterson/Puritan, Inc. Superfund Site which is more fully described in the enclosed Site Description (Enclosure B).

9. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ENCLOSURE B

Site Description

0631-0266

TA00843

SITE DESCRIPTION

The Peterson/Puntan, Inc. Superfund Site consists of two Operable Units encompassing over two miles of mixed industrial/residential property in the towns of Cumberland and Lincoln, Rhode Island. The Site is situated in the north-central portion of Rhode Island along the Blackstone River and includes a portion of the Blackstone River Valley National Heritage Corridor.

Operable Unit 2 of the Site, sometimes referred to as the J.M. Mills Landfill, is located predominately in the town of Cumberland. Operable Unit 2 is surrounded by industrial, residential and semi-rural properties. Bordering the Site to the north is the Hope Webbing Company property located at 88 Martin Street. To the south is the Stop and Shop Market (and strip mall) on Mendon Road (Route 122). To the east is the Mackland Sand and Gravel operations and wetlands formerly known locally as "New River". Finally, to the west is the Blackstone River.

EPA has reason to believe that Operable Unit 2 of the Site was used for disposal of wastes, including wastes containing hazardous substances, from approximately 1954 to 1986. Within this period of time, the property was primarily used as a privately-owned, mixed municipal and industrial landfill. Sewer sludge was also disposed as part of the daily operation. Various types of large, bulky solid materials (including, but not limited to, tanks, crushed drums, pre-formed concrete structures, railroad ties, demolition debris) are deposited aside of the landfill, along the north and south access roads and along the bank of the Blackstone River. The Site includes an area to the south of the landfill which was a former transfer station. Materials were stored along the Providence and Worcester rail road tracks to the east bank of the Blackstone River. To the west, and including the Pratt Dam, there is an access point to a small unnamed island within the river. The Site also includes two access roads, current and former, from Martin Street to the north and Route 122 (Mendon Road) to the south. The now closed Lennox Street municipal well in Cumberland is located approximately 1000 feet South-east from the flank of the landfill. This well was closed by the Rhode Island Department of Health in 1979 due to the presence of volatile organic contaminants found in the supply water.

Preliminary samples taken from the Site indicate the presence of volatile organic contaminants (including, but not limited to, trichloroethylene, freon 11, 1,2-dichloroethene, 1,1,1-trichloroethane, benzene) and chromium, nickel, lead, in groundwater. Contaminants found in soils and sediments include benzo(a)pyrene, chrysene, indeno(1,2,3-cd)pyrene, bis(2-ethylhexyl)phthalate, aroclors, and asbestos insulation/transite.

EPA included the Peterson/Puntan, Inc. Site (which includes the J.M. Mills landfill) on the Superfund National Priorities List on September 8, 1983. EPA conducted two separate removal actions on the landfill (September 25, 1991 and September 12, 1997, respectfully) to prevent and maintain controls of unauthorized access to the property and protect against exposures to identified harmful contaminants until further assessments are made. EPA plans to conduct a Remedial Investigation and Feasibility Study to assess the need for additional environmental response(s) at the Site.

0631-0267

TA00844

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ENCLOSURE C

General Notice Recipients

0631-0268

TA00845

GENERAL NOTICE

Peterson/Puritan, Inc. Operable Unit 2

A list of the names and addresses of Potentially Responsible
Parties to whom this notification was provided.

Acme Service
985 Plainfield Street
Johnston, RI 02919

Clean Harbors, Inc.
385 Quincy Avenue
Braintree, MA 02184

Adv. Envir. Tech.
Onyx Environmental Services, L.L.C.
Greig Siedor
General Counsel
Onyx Environmental Services, L.L.C.
700 East Butterfield Road, Suite 201
Lombard, IL 60148

Coastal Service
Coastal Transportation Services
26 Autumn Pond Park
East Boston, MA 02128

Compugraphic Corp.
80 Industrial Way
Wilmington, MA 01887

Aerovox
Dan Lopes
Facility Manager
Aerovox
167 John Vertenta Boulevard
New Bedford, MA 02745

Corning, Inc.
1 Riverfront Plaza
Corning, NY 14830

American Optical Lens Co.
Len Prunier
American Optical Lens Co.
P.O. Box 8020
Southbridge, MA 01550

Crosby Valve
Ellen Roberts
Controller
Anderson Greenwood
3950 Greenbriar
Stafford, TX 77477

Armstrong Cork, Inc.
Armstrong World Industries, Inc.
c/o Elizabeth B. Davis
Womble Carlyle Sandridge & Rice
3500 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309

Digital Equipment
Walt Rosenberg
Environmental Division-Compaq
Computer Corporation
P.O. Box 692000
Houston, TX 77269

Mr. David J. Brask
217 O'Neil Boulevard
Attleboro, MA 02703

E.C. Whitney
E.C. Whitney & Son
Donald P. Nagle, Esq.
Law Offices of Donald P. Nagle, P.C.
5 Main Street Extension, Suite 300
Plymouth, MA 02360

CCL Custom Manufacturing, Inc.
(Successor to Peterson/Puritan, Inc.)
6133 North River Road, Suite 800
Rosemont, IL 60018

Eye Research Institute
Kimberly Geer
Schepens Eye Research Institute
20 Staniford Street
Boston, MA 02114

City Hospital
Boston Medical Center
Offices of Facility Management
715 Albany Street
Boston, MA 02118

0631-0269

TA00846

Faulkner Hospital
Paul Keating
Material Management Supervisor
Faulkner Hospital
1153 Centre Street
Jamaica Plain, MA 02130

Foxboro Co.
33 Commercial Street
Foxboro, MA 02035

GTE
Al Ludwig
Vice President Controller
GTE Operations Support, Inc.
600 Hidden Ridge Drive (HQEO3E60)
Irving, TX 75038

General Electric
Mark Herwig
Leader, Environmental Programs
General Electric
1000 Western Avenue (MD 164X9)
Lynn, MA 01910

General Tire
Rick Ledsinger
Continental General Tire, Inc.
1800 Continental Boulevard
Charlotte, NC 28273

Gerson Co.
Dave Anteski
Plant Manager
Louis M. Gerson Company
15 Sproat Street
Middleboro, MA 02346

Harvard University
Donald S. Berry, Esq.
McDermott, Will & Emery P.C.
28 State Street, 34th Floor
Boston, MA 02109-1775

Mary T. Feeney, Esq
Office of the General Counsel
980 Holyoke Center
1350 Massachusetts Avenue
Cambridge, MA 02138

Hazeltine
Sue Tynan
BAE Systems
115 Bay State Drive
Braintree, MA 02184

Honeywell
Mr. David P. Cooke
Assistant General Counsel
Honeywell
P.O. Box 2245
Morristown, NJ 07692-2245

I.C.I.
Michelle T. Dillione, Esq.
AstraZeneca, Inc.
1800 Concord Pike
P.O. Box 15438
Wilmington, DE 19850-5438

Kaman Aerospace
William Pakunis
Manager, Environmental Affairs
Kaman Aerospace
P.O. Box 2
Old Windsor Road
Bloomfield, CT 06002

Liqwacon
Envirite Corp.
James Cassidy
President
Envirite Corp.
620 West Germantown Pike, Suite 250
Plymouth Meeting, PA 19462

Maine Electronics
Maine Electronics Rockwell International
River Road
Lisbon, ME 04250

Ms. Linda Marszalkowski
4651 Gulf Shore Boulevard #1501
Naples, FL 34103

Michael John Realty
176 Sherman Avenue
Seekonk, MA 02771-4914

Microwave Associates
Northwest Industrial Park
South Avenue
Burlington, MA 01803

Morse Cutting Tool Division
William Hagen
President
Morse Cutting Tool Division
31695 Stephenson Highway
Madison Heights, MI 48071

MW Carr
M.W. Carr
68 Gorham Street
Somerville, MA 02114

Nunes Disposal, Inc.
Mendon Road
Cumberland, RI 02864

Polaroid
784 Memorial Drive
Cambridge, MA 02139

Polyvinyl Chemical
NeoResins
730 Main Street
Wilmington, MA 01887

Raytheon
Ken Tierney
Environmental Health & Safety Officer
Raytheon Company
141 Spring Street
Lexington, MA 02421

Re-upping
Rueping East Tannery
491 West Water Street
Taunton, MA 02780

Revere Copper
Wayne Linn
Environmental Manager
Revere Copper Products
24 North Front Street
New Bedford, MA 02740

Scott Graphics
195 Appleton Street
Holyoke, MA 01040

Sequa
Bill Gendreau
Operations Manager
General Printing Ink
320 Forbes Boulevard
Mansfield, MA 02048-1806

Shipley Co.
455 Forest Street
Marlborough, MA 01752

Teknor Apex Company
David F. Yopak
Director of Environmental, Health and Safety
Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861-1900

Texon
Jack Dempsey
Personnel Manager
Texon USA, Inc.
1190 Huntington Road
Russell, MA 01071

Three R's Trucking
Three R Transportation, Inc.
c/o Robert G. Funke, Esq.
58 Tremont Street
P.O. Box 628
Taunton, MA 02780

Timex Clock Co.
Timex Corporation
P.O. Box 310
Middlebury, CT 06762

Union Carbide
401 Gage Street
Bennington, VT 05201

VA Hospital
Tim S. McClain
General Counsel
Department of Veterans Affairs
810 Vermont Avenue
Washington, D.C. 20420

Ventron
154 Andover Street
Danvers, MA 01942

Ventron
Congress Street
Beverly, MA 01915

Waste Management of North America
3003 Butterfield Road
Oak Brook, IL 60521

Western Electric
1600 Osgood Street
North Andover, MA 01845

Western Electric
705 Mt. Auburn Street
Watertown, MA 02472

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ENCLOSURE D

Itemized Cost Summary

0631-0273

TA00850

Report Date: 11/27/2001

Page 1 of 2

IFMS Reconciliation Pending

Itemized Cost Summary

PETERSON/PURITAN, CUMBERLAND, RI SITE ID = 01 40

OU 2 costs incurred through September 30, 2001
less cost recovery collections

REGIONAL PAYROLL COSTS	\$258,005.27
HEADQUARTERS PAYROLL COSTS	\$1,343.64
EPA INDIRECT COSTS	\$291,558.63
REGIONAL TRAVEL COSTS	\$1,091.14
ALLOCATION TRANSFER IAG COSTS	
DEPARTMENT OF HEALTH & HUMAN SERVICES (ATSDR)	\$5,821.93
DEPARTMENT OF COMMERCE (NOAA)	\$18,673.59
EMERGENCY REMOVAL CLEANUP SERVICES (ERCS) CONTRACT COSTS	
OHM REMEDIATION SERVICES CORPORATION (68-01-7445)	\$44,685.95
OHM REMEDIATION SERVICES CORPORATION (68-W3-0012)	\$22,333.73
ENVIRONMENTAL MONITORING SYSTEMS LABORATORY (EMSL) CONTRACT COSTS	
LOCKHEED MARTIN SERVICES, INC. (68-D0-0267)	\$48,378.86
ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (ESAT) CONTRACT COSTS	
ROY F. WESTON, INC. (68-01-7443)	\$3,017.21
OTHER CONTRACT COSTS	
TECHLAW, INC. (020109NBLX)	\$383,025.84
LABAT ANDERSON INC. (68-W8-0052)	\$3,543.63
REMEDIAL (REM) CONTRACT COSTS	
CDM FEDERAL PROGRAMS CORPORATION (68-01-6939)	\$2.33
RESPONSE ACTION (RAC) CONTRACT COSTS	
METCALF & EDDY, INC. (68-W8-0042)	\$76,235.61
STATE COOPERATIVE AGREEMENT (SCA) COSTS	
RHODE ISLAND, DEM (V00172101)	\$15,718.00

0631-0274

TA00851

Report Date: 11/27/2001

Page 2 of 2

IFMS Reconciliation Pending

Itemized Cost Summary

PETERSON/PURITAN, CUMBERLAND, RI SITE ID = 01 40

OU 2 costs incurred through September 30, 2001

less cost recovery collections

SUPERFUND TECHNICAL ASSISTANCE AND RESPONSE TEAM (START)
CONTRACT COSTS

ROY F. WESTON, INC. (68-W5-0009) \$507.68

TECHNICAL ASSISTANCE TEAM (TAT) CONTRACT COSTS

ROY F. WESTON, INC. (68-01-7387) \$10,882.71

ROY F. WESTON, INC. (68-W0-0036) \$23,316.71

TECHNICAL ENFORCEMENT SUPPORT (TES) CONTRACT COSTS

CDM FEDERAL PROGRAMS CORPORATION (68-01-7331) \$257.75

CDM FEDERAL PROGRAMS CORPORATION (68-W9-0002) \$12,221.16

ALLIANCE TECHNOLOGIES CORPORATION (68-W9-0003) \$163,428.63

CONTRACT LAB PROGRAM (CLP) COSTS

FINANCIAL COST SUMMARY \$1,460.78

MISCELLANEOUS COSTS (MIS) \$34.68

TOTAL SITE COSTS BEFORE COST RECOVERY COLLECTIONS \$1,385,826.46

COLLECTIONS/ADJUSTMENTS (\$628,823.44)

Total Site Costs: \$759,103.02DOJ costs (10/1/98 - 8/31/00) 3,028.43

Total costs: \$ 762,131.45

0631-0275

TA00852

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ENCLOSURE E

Information Sheet for Small Businesses

0631-0276

TA00853



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U.S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Programs
<http://www.epa.gov/ttn/sbap>

Compliance Assistance Home Page
<http://www.epa.gov/oeca/oc>

Office of Site Remediation Enforcement
<http://www.epa.gov/oeca/osre>

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman
(800) 368-5888

Hazardous Waste/Underground Tanks/
Superfund
(800) 424-9346

National Response Center
(to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone and Refrigerants
Information
(800) 296-1996

Clean Air Technical Center
(919) 541-0800

Wetlands Hotline
(800) 832-7828

0631-0277

Continued on back



Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/oeca/ag)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

The Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry

(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center

(1-800-286-6372 or www.paintcenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](http://www.epa.gov/oeca/smbusi.html)). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

PETERSON/PURITAN, INC.

Superfund Site

Operable Unit 2

Cumberland, RI

ATTACHMENT 1

0631-0279

TA00856



TEKNOR APEX COMPANY

PAWTUCKET, RHODE ISLAND 02862

June 8, 1978

To Whom it May Concern:

We are concerned about rumors that J. M. Mills landfill in Cumberland may be closed in the near future.

If this landfill were to close, it would create a burden in the disposition of our industrial waste, along with our manufacturing neighbors in the Pawtucket area.

Your consideration in this matter will be greatly appreciated.

RECEIVED

JUL 13 1978

DEPARTMENT 3: ENVIRONMENTAL MANAGEMENT
Solid Waste Management Program

Yours truly,

TEKNOR APEX COMPANY

John Izzo
John Izzo,

Vice President Factory Administration

JL/-

0631-0280

Source:	RIDEM
Number Range:	1000662
File Location:	100 (1000662)

PETERSON PURITAN
1000662

0631-0173

6820

TA00857

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ATTACHMENT 2

0631-0281

TA00858

REDACTED - Attachment 4a - REDACTED
Carrier Survey in Response to Request 5(a) for Goditt & Boyer

Customer Name	Type of Business	Waste Description	Container Type	Pick-up frequency	Source of Information (and dates of tenure)	Disposal Location (and Relevant Time Period)
Apex Store	department store in Pawtucket	trash and boxes	50-yard box	twice weekly for an extended period of time	driver (1962-1985)	J.M. Mills Landfill (1964-1975)
DRIVER 1	Apex Teknor plant located in Pawtucket	a lot of rubber dust reportedly containing chemicals because of the odor emitted and because its powders "ignited easily"	two 6-yard boxes	relief pick-ups	driver (1962 - 1985, part time/full time)	J.M. Mills Landfill (throughout the 1970s and early 1980s)
DRIVER 2	Apex plant in Pawtucket that manufactured rubber products	rubber chunks, sweepings and some 55-gallon fiber drums that contained powder waste	50-yard compactor box	on average, once every one to three weeks with infrequent Site disposals	driver / a few years in the early 1980s)	J.M. Mills Landfill (a couple of years in the early 1980s)
	adjacent building which some drivers referred to as the "Apex Dust Stop"	large quantities of a fine powdery dust waste, some of which was light brown and some a darker color	50-yard box			
DRIVER 3	plant in Pawtucket that was involved with the manufacture of rubber products	a lot of rubber waste	50-yard box	daily for an extended period of time	driver (1962-1985)	J.M. Mills Landfill (1964-1975)
DRIVER 4	Pawtucket, RI chemical company that manufactured rubber products	"a lot of black dust"	8-yd. f/e box; roll-off drivers hauled "manufacturing waste"	relief pick-ups with some Site disposals	driver (late 1960s late 1970s)	J.M. Mills Landfill late 1960s-late 1970s

TA00859

0631-0283

REDACTED - Attachment 4a - REDACTED
Carrier Survey in Response to Request 5(a) for Goditt & Boyer

Customer Name	Type of Business	Waste Description	Container Type	Pick-up frequency	Source of Information (and dates of tenure)	Disposal Location (and Relevant Time Period)
DRIVER 5 Apex Teknor (continued)	Pawtucket, RI chemical company that manufactured rubber products	a 50-yard box with numerous white, brown and blue powder bags many of which contained residue amounts of cyanide as indicated on bag labels, loose powder, and cardboard drums that contained rubber chunks; a second 50-yd. box contained large amounts of black dust	two 50-yd. roll-off boxes	relief stops with some periods of daily and twice daily pick-ups; some Site disposals	driver (1980-1985)	J.M. Mills Landfill 1980-1983
Athen Rubber	not indicated	black dust; "vulcanizing waste"	2-yard box	relief pick-ups	driver (1962 - 1985, part time/full time)	J.M. Mills Landfill (throughout the 1970s and early 1980s)
	company which made rubber products	a lot of black dusty powder	2-yard box	regular pick-ups, usually two or three times weekly with Site disposal frequency dependent upon driver location when he had a full load	driver (1968-1985)	J.M. Mills Landfill (1970-early 1980s)

TA00860

0631-0284

4254

Relocation Permit
1-10-80
J.M.M.

REDACTED - Attachment 4a - REDACTED
Carrier Survey in Response to Request 5(a) for Goditt & Boyer

Customer Name	Type of Business	Waste Description	Container Type	Pick-up frequency	Source of Information (and dates of tenure)	Disposal Location (and Relevant Time Period)
Stop & Shop	market in Readville	boxes and foodstuffs	50-yard box	twice weekly for an extended period of time	driver (1962-1985)	J.M. Mills landfill (1964-1975)
Sweet Manufacturing	Attleboro business that relocated to Norton	a lot of pallets	no recall	relief stops with some Site disposals	driver (late 1960s late 1970s)	J.M. Mills Landfill (late 1960s-late 1970s)
Terken Apex DRIVER 4	not indicated	not indicated	30- and 50-yard box	regularly for approximately five years in the 1970s, then occasionally thereafter	driver (approximately 1971-1985)	J.M. Mills Landfill (heaviest use of the Site was for 5 years in the early to mid 1970s)
Thermal Plastics	not indicated	plastic waste	three 2-yard boxes	relief pick-ups with some Site disposal; other G&B drivers serviced this account six times weekly	driver (1962 - 1985, part time/full time)	J.M. Mills Landfill (throughout the 1970s and early 1980s)
Truax	company in Pawtucket that manufactured heavy-duty rubber mats for industrial use	dark chemical dust or powder	50-yard box	once every one to three weeks with infrequent Site disposals	driver (a few years in the early 1980s)	J.M. Mills Landfill (a couple of years in the early 1980s)

TA00861

0631-0285

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ATTACHMENT 3

0631-0282

TA00862

**APPENDIX B
RESPONSES TO QUESTIONS 4 – 8 FOR
505 CENTRAL AVE.**

JM Mills Site Information Request for the Time Period of 1954 to 1986

Question 4 Compliance with This Request

Name (i)	Current Position (ii)	Job Title during period of investigation (iii)	Job Description	Current or past employee (iv)
Ronald Sito	Personnel Manager	Rubber operator. Hose Dept Manager	manufactured rubber products; managed hose manufacturing operation	Current
Arthur Laroach	Maintenance Oiler	Plastics Dicer Operator. Bagger Leadman. Mill Leadman	manufactured plastic compounds; oversaw manufacturing process as leadman	Current
John Grimaldi	Maintenance Porter	Rubber Banbury Operator. Mill Operator. Compounder. Leadman	manufactured rubber compounds; oversaw manufacturing process as leadman	Current. retired on 3/15/99
Edward Lapari	Rubber Production Supervisor	Rubber Banbury Operator. Leadman. Supervisor	manufactured rubber compounds; oversaw manufacturing process as leadman and supervisor	Current
Arthur LaPerche	Retired	Plasticizer Operator, Plasticizer Manager (at Mendon Avenue)	manufactured plasticizer at Mendon Avenue site	Retired
Herb Malin	Executive Vice President	Engineer Vice President of Manufacturing	overall process knowledge	Current

- v. Divisions for which records were reviewed: Teknor Apex Company
- vi. The nature of the written documents reviewed are related to waste handling at the facility. These documents date back to 1980. Written records dated 1980 through 1986 were reviewed. These were compiled by Ron Sito of Teknor Apex (former Safety and Environmental Manager - refer to section 7).
- vii. These records were kept in Environmental Manager's Office.
- viii. These records are currently kept in the Environmental Manager's Office.

Question 5 Generation of Waste During Time of Disposal

a) Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861

b)

Process	Commenced	Ceased	Location
Rubber Compounding (Tread Rubber)	1968	1993	505 Central Ave.
Rubber Compounding & Molding (Blocks)	1968	present operation	505 Central Ave
Rubber Molding (Mats)	1977	present operation	505 Central Ave.
Rubber Compounding (Solite - shoe soling)	1968	1984	505 Central Ave
Plastics Compounding (PVC)	1968	present operation	505 Central Ave.
Garden Hose Manufacturing	1968	1992	505 Central Ave
Thermoplastic Elastomer (TPE) Compounding	1980	present operation	505 Central Ave.

c)

Process	Changes in operation
Rubber Compounding (Tread Rubber)	Production moved to Tennessee plant in 1993.
Rubber Compounding & Molding (Blocks/ Mats)	Production increased in these areas with the deletion of other products.
Rubber Compounding (Solite - shoe soling)	Production ceased in early 1990s.
Plastics Compounding (PVC)	4 production lines through 1968, 5 lines through 1980, 6 lines through 1986 with the addition of a line which manufactured non-toxic, medical grade PVC.
Garden Hose Manufacturing	Production moved to other TA plants in 1993.
Thermoplastic Elastomer (TPE) Compounding	Began in Plastics department; changed to Rubber department in 1984.
Manufacturing chemical additives for plastics compounds	Production moved to Massachusetts plant.

- d) Rubber Compounds for Tires
 Rubber Compounds for Blocks and Mats
 Rubber Blocks and Mats
 Polyvinyl Chloride (PVC) Compounds
 Thermoplastic Elastomer (TPE) Compounds
 Chemical additives for plastics compounds

e)

Process	Raw Materials
Rubber Compounding/ Manufacturing	Rubber blocks, zinc stearate, carbon black, sulfur, accelerators, fillers, oils
PVC Compounding	PVC resin, calcium carbonate, plasticizers, colorants, lead compounds, stabilizers
TPE Compounding	Rubber blocks, zinc stearate, carbon black, sulfur, accelerators, fillers, oils, plasticizers
Chemical additives for plastics compounds (plasticizer).	C ₄ -C ₁₃ alcohols, phthalic anhydride, organic acids, sulfonic acid, filter aides (clay)

- f) MSDSs were not available until 1986, and therefore are not provided.
- g) At 505 Central Avenue location, all departments (Plastics and Rubber) used kerosene (#2 fuel oil) to clean equipment. An estimated 400 gallons was used per year.

At Mendon Avenue location, equipment was washed down with water to a tank. The water was transferred to the drain and the plasticizer was recovered and used in the production of OGAP (Off Grade Alcohol Phthalates), a lower grade plasticizer.

h)

Types of Materials Spilled	Materials/Methods used to Cleanup Spills	Disposal of Spilled Material
Chemical additive to plastic	PVC Resin was used to absorb plasticizer and dry material was swept into containers.	Material was recycled into hose product.
Oils (used in maintenance or rubber)	Speedi-dri was used to absorb oil and material was placed into bags, containers, or drums depending on volume.	Material was disposed of in dumpster and removed by waste hauler.

No documentation supports any transfer of any material to the Site.

- i) Refer to attachment I to this section, Process Flow Diagrams.

Question 6 Respondents Wastes and Waste Streams (including By-Products)

a) See attached Waste Survey

b)

Waste Name	Physical State	Chemical Composition	Color	Odor	Monthly Volume	Dates Generated
Burnt Rubber Baiches	solid	styrene butadiene rubber nitrile butadiene rubber natural rubber	black brown gray	none	unknown	Throughout period
Cured Rubber Scrap, Flash, and Dust	solid	styrene butadiene rubber nitrile butadiene rubber natural rubber	black brown	none	unknown	Throughout period
Burnt PVC Baiches	solid	PVC	various	none	unknown	Throughout period
Maint. Waste oil	liquid	maintenance oil including gear oil, motor oil, gasoline, lube oil, etc.	brown	oil	unknown (small amounts)	Throughout period
Plasticizer	liquid	plasticizers, used in Rubber manufacturing	clear, yellow, brown	slight	unknown	Throughout period
Unused raw materials	solids/ liquids	carbon black, calcium carbonate, rubber, unrecyclables	various	various	unknown (small amounts)	Throughout period
Filter Press Cake from Plasticizer	solids/ liquids	plasticizers, various solids generated in manufacture of plasticizer	yellow black		unknown	1968-1970

No documentation supports any transfer of any material to the Site.

c) Refer to attached Process Flow Diagrams (attachment 1).

d) There was no single person responsible for waste collection and management until 1988. Each department had supervisors who handled disposition of waste from that department. In 1988, Ron Sio became Safety and Environmental Manager.

c)

Waste Name	Type of Container Stored in	Location of Collection	Location of Storage
Burnt Rubber Batches	none	Rubber Department	Dumpster in Receiving Department
Burnt PVC Batches	none	Plastics Department	Dumpster in Receiving Department
Waste oil	drum	each department	Warehouse at Mendon Ave
Unused raw materials	various - bags, metal drums, cardboard drums	each department	Dumpster in Receiving Department
Miscellaneous Solvents	drums	Rubber Department Mendon Avenue	Drums stored at Mendon Avenue
Filter Press Cake	metal drums	Mendon Avenue	Mendon Avenue

No documentation supports any transfer of any material to the Site.

Question 7 Respondents Disposal/Treatment/Storage/Recycling/Sale of Waste

a) Identify persons who currently have and those who have been responsible for disposal of waste

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Diane Dandeneau	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x780		Teknor Apex Company, Environmental Manager	
Ronald Sito	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x281		Teknor Apex Company, Safety and Environmental Manager	

- b) There are many persons who currently have and/or have had knowledge of the disposal of waste. Those questioned for this information request are listed below:

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Arthur Laroachc	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000 x 260		Teknor Apex Company, Maintenance Oiler	
John Grimaldi	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000		Teknor Apex Company, Maintenance Porter	
Arthur LaPercie	Retired		Teknor Apex Company, Plasticizer Production Operator	
Herb Malin	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000 x 380		Teknor Apex Company, Executive Vice President	

- c) Persons currently having and those who have had responsibility for Environmental Affairs

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Diane Dandencau	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x780		Teknor Apex Company, Environmental Manager, 10/97 - present	
Laura Salamy (former employee)	Precision Art and Pac Glass, Inc 22 Almeida Ave. East Providence, RI 02914 (401) 438-9800			
Tim Coady (former employee)				
Ronald Sito	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000x281		Teknor Apex Company, Safety and Environmental Manager, 1990- 1995	

d)

Name	Job Title with dates	Supervisor	Current Position	What type of information is possessed?
Diane Dandeneau	Environmental Manager	Christopher ReCasino	same	overall plant environmental knowledge (present)
Ronald Sito	Rubber operator, Hose Dept Manager, Safety and Environmental Manager (1990-1995), Personnel Manager (1995-present)	Paul Dubanowitz Christopher ReCasino	Personnel Manager	general plant production and environmental knowledge (1968 - present)
Arthur Laroach	Plastics Dicer Operator, Bagger Leadman, Mill Leadman, Med Line Operator, Maintenance Oiler	Don Brown	Maintenance Oiler	PVC manufacturing and maintenance experience (1968 - present)
John Grimaldi	Rubber Banbury Operator, Mill Operator, Compounder, Leadman, Maintenance Porter	Mark Eddeleston	Maintenance Porter	Rubber manufacturing and maintenance experience (1968 - present)
Arthur LaPerche	Plasticizer Operator, Plasticizer Manager		Retired	Knowledge of Plasticizer production at Mendon Avenue from 1968-1970.
Herb Malin	Plastics Engineer, Vice Present of Manufacturing, Executive Vice President	Jonathan Fain	Executive Vice President	Technical knowledge of plasticizer and plastics manufacturing process

e)

Waste Name	Type of Container Stored in	Description of Container	Used Container Prior Use
Burnt Rubber Batches	none	not applicable	not applicable
Burnt PVC Batches	none	not applicable	not applicable
Waste oil	drum	metal drums, most likely black	waste oil
Unused raw materials	various - bags, metal drums, cardboard drums	used cardboard drums were typically blue	Pigment raw materials
Filter Press Cake	metal drums	metal drums, most likely black	unknown

No documentation supports any transfer of any material to the Site.

- f) Records date back to 1980 only. Therefore, information contained below is based on records from 1980 - 1986.

Waste Name	Where Disposed of (r & h)	Who Carried it (i,j,k)	What was the Frequency of Shipment (l)	What was the Volume of Shipments (m)	Dates from and to material was shipped (n)
Waste Oil (manifested)	a) Murphy Waste Oil Woburn, MA b) Narragansett Improv. Co, Providence, RI	McDonald & Watson	Twice per year from 1980 - 1985		
Waste Oil (manifested)		East Bay Waste Oil	Once in 1986		
Waste Oil (manifested)	Olsen Greenhouses Raynham, MA	Sampson Oil	once in 1986	1736 gals.	11/13/86
Waste Oil (manifested)	Lionetti Oil Recovery, Inc. Old Bridge, NJ	Oil Recovery Corporation	once in 1986	1800 gals.	12/12/86
Waste Solvents	Solvent Recovery Service of New England	same	Three times in 1984	25,80, and 24 drums MEK, alcohols, misc solvents	3/84, 6/84, 6/84

No documentation supports any transfer of any material to the Site.

- o) Copies of Manifests or Bills of Lading - see attached.
- p) No knowledge of types of vehicles used.
- q) No knowledge of carrier's employees except for names on manifest documents from 1980 to 1986.
- r) Listed in table in section f. Ultimate disposal assumed to be same location.
- s) Listed in table in section f. Ultimate disposal assumed to be same location.
- t) Information on how Teknor Apex managed waste pickups is unknown.
- u) The Respondent did not select the destination(s) for off site solid waste disposal.
- v) Ron Sito, Environmental manager from 1988.

- w) This information is unknown. Dry material may have been washed into drains which ultimately flowed into the POTW.
- x) The Blackstone Valley District Commission
102 Campbell Avenue
East Providence, RI 02916
at present: The Narragansett Bay Commission
235 Promenade Street
Providence, RI 02908
- y) See Waste Survey
- z) No documentation supports any transfer of any material to the Site.

Question 8 - Respondent's Environmental Reporting

- a) Central Avenue: RID045367968
Mendon Avenue: RID987480357
- b) None
- c) Not applicable
- d) Rhode Island Department of Environmental Management
Division of Air and Hazardous Materials
Room 204 Cannon Building
Providence, RI 02908

Rhode Island Department of Environmental Management
Division of Air and Hazardous Materials
75 Davis Street
Providence, RI 02908

Rhode Island Department of Environmental Management
Division of Waste Management
291 Promenade Street
Providence, RI 02908
- e) 1985-present

- f) 1) Emergency Planning and Community Right to Know Act, 42 U.S.C. 1101 (EPCRA)
2) SARA Section 313 Title III - Form R Reporting
3) RI Air Pollution Control Regulations
4) Resource Conservation and Recovery Act, Title 40 CFR Parts 260 - 279
5) RI Rules and Regulations for Hazardous Waste Management
6) Rules and Regulations for The Use Of The Wastewater Facilities Within The Narragansett Bay Water Quality Management District
7) SARA Title III, Section 312, Tier II

g) EPCRA Reporting Center
PO Box 3348
Merrifield, VA 22116

RI Department of Environmental Management
Division of Air Resources
235 Promenade Street
Providence, RI 02908

The Narragansett Bay Commission
235 Promenade Street
Providence, RI 02908

State Emergency Response Commission
c/o Department of Labor and Training
Division of Occupational Safety
610 Manton Avenue
Providence, RI 02909
City of Pawtucket
Fire Prevention Office
155 Roosevelt Avenue
Pawtucket, RI 02760

LEPC District 4
Pawtucket Fire Department
145 Roosevelt Avenue
Pawtucket, RI 02760

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ATTACHMENT 4

0631-0286

TA00874

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

Information Request Waste Survey

Name of Respondent: Diane Dandaneau

Respondent's Location: Teknor Apex Company
505 Central Avenue
Bon-Dick, R.I. 02861 Date: 2/18/77

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Acids				
Adhesives	5 gal pails, 55 gal drums	Block Glues	*	dumpster
Asbestos (incl. Insulation and transite piping)	solid pipe insulation			dumpster
Adsorbents (from spills, leaks, etc.)	solid	Speedi-Die	*	dumpster
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				

* No documentation supports any transfer of any material to the Site

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Lubricants				
Oils				
Oil Filters				
Transmission fluids				
other				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals	waste solvents Carbon black, solid	various	*	recycled - stored at warehouse unused material thrown in dumpster
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				

* No documentation supports any transfer of any material to the Site

TA00876

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pail; Sludge/55 gal drums; Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus)	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in landfill/stored at "x" location on site/disposed in trenches @ "x" location)
Etching Solutions				
Filters				
Flammable, Reactive, or Explosive Materials				
Fungicides				
Herbicides				
Insecticides				
Insulating/Fire Proofing Materials				
Laboratory Wastes	liquids, solids		*	disposed in sink
Lubricants	grease hydraulic fluid		*	stored at warehouse
Metals:				
grindings				
powders				
shavings				
sludges				
solutions				

* No documentation supports any transfer of any material to the Site

TA00877

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
other: (e.g. tanks)				
Paint and Coating Wastes:	liquid/solid		*	dumpster
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				

* No documentation supports any transfer of any material to the Site

TA00878

0631-0301

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Photography Wastes:				
developers				
fixers				
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)	cleaning → Kerosene		*	dumpster
Rodenticides				
Septic System Wastes				
Sludges				

* No Documentation supports any transfer of any material to the Site

0631-0302

TA00879

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				
Solvents				
Waste Oils	liquid	gear oil, lube oil, misc maintenance oil	*	stored in drums at Newton Warehouse
Wood Preservatives		plasticizers, Rubber printer's oil, #2 fuel oil		
Other:				

* No documentation supports any transfer of any material to the Site

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ATTACHMENT 5

0631-0304

TA00881

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

Information Request Waste Survey

Name of Respondent: Teknor Apex Co.

330 Oakhill Ave
Respondent's Location: Attleboro, MA Date: February 22, 1999
02703

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Acids				
Adhesives				
Asbestos (incl. Insulation and transite piping)				
Adsorbents (from spills, leaks, etc.)				
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed Landfill/stored at "x" location on site/disposed in trenches @ "x" location
Lubricants	Vacuum Truck	Waste Oil Samson Oil		Burned for Heating
Oils	1. Rolloff 2. Vacuum Truck	Waste #6 Oil & Soil Waste #6 Oil & Water	~~SA~~	Unknown
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				

* No documentation supports any transfer
of any material to the Site ii

TA00883

0631-0306

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed Landfill/stored at "x" location on site/disposed in trenches @ "x" location
	Etching Solutions				
	Filters				
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes	55 Gallon Drums	Waste Tetrahydrofuran Mixture (NE Solvents	*	Unknown
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed Landfill/stored at "x" location on site/disposed in trenches @ "x" location
	other: (e.g. tanks)				
	Paint and Coating Wastes:				
	paint				
	pigments				
	stripper				
	stains				
	thinner				
	turpentine				
	varnish				
	other:				
	PCBs (polychlorinated biphenyls)				
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), place Landfill/stored at "x" location on site/disposed in trenches @ "x" location
Photography Wastes:				
developers				
fixers				
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes	Vacuum Truck	Septic System Waste Sanitation Co	*	Waste Water Treatment
Sludges				

* No documentation supports any transfer of any material to the Site

TA00886

0631-0309

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placec Landfill/stored at "x" location on site/disposed in trenches @"x" location
	Soldering Solutions				
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				
	Solvents				
	Waste Oils				
	Wood Preservatives				
	Other:				

TA00887

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ATTACHMENT 6

0631-0311

TA00888

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

Information Request Waste Survey

Name of Respondent: Teknor Corp

Respondent's Location: Cumberland Date: 3/1/99
RI

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pail, Sludge/55 gal drums, Solids/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	Acids				
	Adhesives				
	Asbestos (incl. Insulation and transite piping)				
	Adsorbents (from spills, leaks, etc.)	Dumpster	Spent - Dry	*	Unknown
	Automotive Related Wastes:				
	Antifreeze				
	Batteries				
	Brake Fluids				
	Degreasers				

* No documentation supports any transfer of any material to the Site

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Lubricants				
Oils				
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				

TA00890

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
	Etching Solutions				
	Filters				
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
	Lubricants				
	Metals:				
	grindings				
	powders	Solid pigments into dumpster	Unknown	*	Unknown
	shavings				
	sludges				
	solutions				

iii * No documentation supports any transfer of any material to the Site

TA00891

0631-0314

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
other: (e.g. tanks)				
Paint and Coating Wastes:	Small Quantities (used to paint walls) may have been disposed	UNKNOWN	*	UNKNOWN
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				

iv * No documentation supports any transfer of any material to the Site

0631-0315

TA00892

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Photography Wastes:				
developers				
fixers				
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)	(from equipment cleaning) Dumpster	Cenille Wiping cloths. Parker	*	Unknown
Rodenticides				
Septic System Wastes				
Sludges				

* No documentation supports any transfer of any material to the Site

TA00893

0631-0316

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO ₃ , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				
Solvents				
Waste Oils				
Wood Preservatives				
Other:				
solids from recirculated cooling water system cleanout	Barreled → Dumpster	Unknown	*	Unknown

* No documentation supports any transfer of any material to the Site

PETERSON/PURITAN, INC.

Superfund Site
Operable Unit 2
Cumberland, RI

ATTACHMENT 7

0631-0318

TA00895

PETERSON PURITAN
OPERATING UNIT 2
SITE FILE

CONFIDENTIAL INFORMATION REDACTED.

[SEE CONFIDENTIAL FILE(S) FOR ADDITIONAL INFORMATION]

Note: This is a slip sheet. Please do not apply document number labels to this sheet.

TA00896

PETERSON/PURITAN, INC.
Superfund Site
Operable Unit 2
Cumberland, RI

ATTACHMENT 8

0631-0328

TA00897

PETERSON PURITAN
OPERATING UNIT 2
SITE FILE

CONFIDENTIAL INFORMATION REDACTED.

[SEE CONFIDENTIAL FILE(S) FOR ADDITIONAL INFORMATION]

Note: This is a slip sheet. Please do not apply document number labels to this sheet.

TA00898

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**

(Domestic Mail Only: No Insurance Coverage Provided)

7000 1670 0001 9636 4534

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Post
He

0631-0239

Sent To
David F. Yoppa, Dir. ENV. HHS
Street, Apt. No., or PO Box No.
TEKNO. Apex Co. 505 CENTRAL AVE.
City, State, ZIP
PANTUCKET, RI 02861-1900

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
David F. Yoppa
Dir. OF ENVIRONMENTAL HHS
SAFETY (TEKNO Apex Co.)
505 CENTRAL AVENUE
PANTUCKET, RI 02861-1900

4a. Article Number
7000167000196364534

4b. Service Type
☐ Registered
☐ Express Mail
☐ Return Receipt for Merchandise
☒ Certified
☐ Insured
☐ COD

7. Date of Delivery

5. Received By: (Print Name)

6. Signature (Addressee or Agent)

[Signature]

8. Addressee's Address (Only if requested and fee is paid)

0631-0240

PS Form 3811, December 1994

102595-98-8-0229

Domestic Return Receipt

Thank you for using Return Receipt Service.

TA00899

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail
- Certified Mail is not available for any class of international mail
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For insurables, please consider insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. (For insurables, "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.)
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, May 2000 (Reverse)

102595-99-M-2087

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10.

• Print your name, address, and ZIP Code in this box •

DAVID NEWTON
U.S. EPA-HBO
1 CONGRESS STREET
BOSTON, MA 02114

0631-0241

TA00900

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNILEVER BESTFOODS and KIK CUSTOM
PRODUCTS, INC., f/k/a CCL CUSTOM
MANUFACTURING, INC.

Plaintiffs,

v.

TEKNOR APEX COMPANY, *et al.*
Defendants.

Civil Action No. 01-496-L

KIK CUSTOM PRODUCTS, INC., f/k/a
CCL CUSTOM MANUFACTURING, INC.

Plaintiff,

v.

A.T. CROSS COMPANY, *et al.*
Defendants

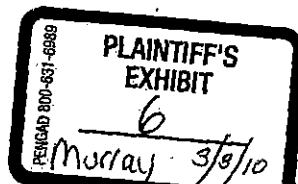
Civil Action No. 01-511-L

**DEFENDANT TEKNOR APEX COMPANY'S RESPONSES TO
PLAINTIFFS' REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Defendant Teknor Apex Company ("Defendant"), pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, provides the following responses to Plaintiffs' Requests for Admission, Interrogatories, and Requests for Production of Documents. Defendant continues to search for information responsive to Plaintiffs' Interrogatories, Requests for Admission, and Request for Production of Documents and as additional information becomes available will amend, modify, and/or supplement these answers and objections accordingly.

General Objections

a. Defendant objects to each and every interrogatory, requests for admission, and request for production of documents to the extent that it seeks information that is protected from



disclosure by the attorney/client privilege or reflects the opinions, strategies, or mental impressions of counsel or was prepared in anticipation of litigation.

b. Defendant objects to each and every interrogatory, requests for admission, and request for production of documents to the extent that it is overly broad and burdensome.

c. Defendant objects to each and every interrogatory, requests for admission, and request for production of documents to the extent that it seeks information which is neither admissible, nor relevant, nor likely to lead to admissible information.

d. Defendant objects to each and every interrogatory, requests for admission, and request for production of documents to the extent that it contains vague and/or undefined terms.

REQUESTS FOR ADMISSION

I. Pawtucket, Rhode Island

Request No. 1. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained used oil or waste oil.

Response No. 1. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 2. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained asbestos.

Response No. 2. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 3. During the Relevant Period, Waste generated by You at Your Pawtucket,

Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained barrels or drums of liquid.

Response No. 3. Defendant denies that Waste generated at the Pawtucket facility contained barrels or drums of liquid.

Request No. 4. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained bags with residual powder or dust.

Response No. 4. Admit.

Request No. 5. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained powders.

Response No. 5. Admit.

Request No. 6. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained dust.

Response No. 6. Admit.

Request No. 7. During the Relevant Period, You had a contract, agreement or otherwise arranged with Goditt & Boyer for the transport and Disposal of Waste generated by You at Your Pawtucket, Rhode Island facilities.

Response No. 7. Admit.

Request No. 8. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities was transported by Goditt & Boyer to the Site.

Response No. 8. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 9. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities was disposed of at the Site by Goditt & Boyer.

Response No. 9. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 10. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained used oil or waste oil and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 10. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 11. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained used oil or waste oil and was disposed of at the Site by Goditt & Boyer.

Response No. 11. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 12. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained asbestos and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 12. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 13. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained asbestos and was disposed of at the Site by Goditt & Boyer.

Response No. 13. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 14. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained barrels or drums of liquid and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 14. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 15. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained barrels or drums of liquid and was disposed of at the Site by Goditt & Boyer.

Response No. 15. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 16. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained bags with residual powder or dust and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 16. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission. See

Response to No. 4 above.

Request No. 17. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained bags with residual powder or dust and was disposed of at the Site by Goditt & Boyer.

Response No. 17. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission. See Response to No. 4 above.

Request No. 18. During the Relevant Period, Waste generated by you at Your Pawtucket, Rhode Island facilities contained powders and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 18. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission. See Response to No. 5 above.

Request No. 19. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained powders and was disposed of at the Site by Goditt & Boyer.

Response No. 19. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission. See Response to No. 5 above.

Request No. 20. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained dust and was transported to the Site by Goditt & Boyer for

Disposal.

Response No. 20. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission. See Response to No. 6 above.

Request No. 21. During the Relevant Period, Waste generated by You at Your Pawtucket, Rhode Island facilities contained dust and was disposed of at the Site by Goditt & Boyer.

Response No. 21. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission. See Response to No. 6 above.

II. Cumberland, Rhode Island

Request No. 22. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained used oil or waste oil.

Response No. 22. See Response to No. 27 below. In further response, after reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known of readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission as it refers to used oil or waste oil.

Request No. 23. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained barrels or drums of liquid.

Response No. 23. See Response to No. 27 below. In further response Teknor Apex

Company denies that Waste generated at the Cumberland, Rhode Island facility contained barrels or drums of liquid.

Request No. 24. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained bags with residual powder or dust.

Response No. 24. Admit.

Request No. 25. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained powders.

Response No. 25. Admit.

Request No. 26. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities for pick-up and Disposal by Goditt & Boyer contained dust.

Response No. 26. Admit.

Request No. 27. During the Relevant Period, You had a contract, agreement or otherwise arranged with Goditt & Boyer for the transport and Disposal of Waste generated by You at Your Cumberland, Rhode Island facilities.

Response No. 27. Admit.

Request No. 28. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities was transported by Goditt & Boyer to the Site.

Response No. 28. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 29. During the Relevant Period, Waste generated by You at Your

Cumberland, Rhode Island facilities was disposed of at the Site by Goditt & Boyer.

Response No. 29. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 30. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained used oil or waste oil and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 30. See Responses to No. 22, 27, and 28 above.

Request No. 31. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained used oil or waste oil and was disposed of at the Site by Goditt & Boyer.

Response No. 31. See Responses to No. 22, 27, and 28 above.

Request No. 32. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained barrels or drums of liquid and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 32. See Responses to No. 23, 27, and 28 above.

Request No. 33. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained barrels or drums of liquid and was disposed of at the Site by Goditt & Boyer.

Response No. 33. See Responses to No. 23, 27, and 28 above.

Request No. 34. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained bags with residual powder or dust and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 34. See Responses to No. 24, 27, and 28 above.

Request No. 35. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained bags with residual powder or dust and was disposed of at the Site by Goditt & Boyer.

Response No. 35. See Responses to No. 24, 27, and 28 above.

Request No. 36. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained powders and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 36. See Responses to No. 25, 27, and 28 above.

Request No. 37. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained powders and was disposed of at the Site by Goditt & Boyer.

Response No. 37. See Responses to No. 25, 27, and 28 above.

Request No. 38. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained dust and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 38. See Responses to No. 26, 27, and 28 above.

Request No. 39. During the Relevant Period, Waste generated by You at Your Cumberland, Rhode Island facilities contained dust and was disposed of at the Site by Goditt & Boyer.

Response No. 39. See Responses to No. 26, 27, and 28 above.

III. Attleboro, Massachusetts

Request No. 40. During the Relevant Period, Waste generated by You at Your Attleboro,

Massachusetts facilities for pick-up and Disposal by Goditt & Boyer contained used oil or waste oil.

Response No. 40. See Response to No. 45 below. In further response, after reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known of readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission as it refers to used oil or waste oil.

Request No. 41. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities for pick-up and Disposal by Goditt & Boyer contained barrels or drums of liquid.

Response No. 41. See Response to No. 45 below. In further response Teknor Apex Company denies that Waste generated at the Attleboro, Massachusetts facility contained barrels or drums of liquid.

Request No. 42. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities for pick-up and Disposal by Goditt & Boyer contained bags with residual powder or dust.

Response No. 42. Admit.

Request No. 43. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities for pick-up and Disposal by Goditt & Boyer contained powders.

Response No. 43. Admit.

Request No. 44. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities for pick-up and Disposal by Goditt & Boyer contained dust.

Response No. 44. Admit.

Request No. 45. During the Relevant Period, You had a contract, agreement or otherwise

arranged with Goditt & Boyer for the transport and Disposal of Waste generated by You at Your Attleboro, Massachusetts facilities.

Response No. 45. Admit.

Request No. 46. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities was transported by Goditt & Boyer to the Site.

Response No. 46. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 47. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities was disposed of at the Site by Goditt & Boyer.

Response No. 47. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 48. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained used oil or waste oil and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 48. See Responses to No. 40, 45, and 46 above.

Request No. 49. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained used oil or waste oil and was disposed of at the Site by Goditt & Boyer.

Response No. 49. See Responses to No. 40, 45, and 47 above.

Request No. 50. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained barrels or drums of liquid and was transported to the Site by

Goditt & Boyer for Disposal.

Response No. 50. See Responses to No. 41, 45, and 46 above.

Request No. 51. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained barrels or drums of liquid and was disposed of at the Site by Goditt & Boyer.

Response No. 51. See Responses to No. 41, 45, and 47 above.

Request No. 52. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained bags with residual powder or dust and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 52. See Responses to No. 42, 45, and 47 above.

Request No. 53. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained bags with residual powder or dust and was disposed of at the Site by Goditt & Boyer.

Response No. 53. See Responses to No. 42, 45, and 46 above.

Request No. 54. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained powders and was transported to the Site by Goditt & Boyer for Disposal.

Response No. 54. See Responses to No. 43, 45, and 46 above.

Request No. 55. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained powders and was disposed of at the Site by Goditt & Boyer.

Response No. 55. See Responses to No. 43, 45, and 47 above.

Request No. 56. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained dust and was transported to the Site by Goditt & Boyer for

Disposal.

Response No. 56. See Responses to No. 44, 45, and 46 above.

Request No. 57. During the Relevant Period, Waste generated by You at Your Attleboro, Massachusetts facilities contained dust and was disposed of at the Site by Goditt & Boyer.

Response No. 57. See Responses to No. 44, 45, and 47 above.

IV. Use Oil or Waste Oil

Request No. 58. Use oil or waste oil contains Hazardous Substances.

Response No. 58. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 59. Used oil or waste oil used by You during the Relevant Period at Your Pawtucket, Rhode Island facilities contained Hazardous Substances.

Response No. 59. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 60. Used oil or waste oil from Your Pawtucket, Rhode Island facilities that was disposed of by You during the Relevant Period contained Hazardous Substances.

Response No. 60. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 61. Used oil or waste oil used by You during the Relevant Period at Your Cumberland, Rhode Island facilities contained Hazardous Substances.

Response No. 61. After reasonable inquiry, including a thorough document search and

interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 62. Used oil or waste oil from Your Cumberland, Rhode Island facilities that was disposed of by You during the Relevant Period contained Hazardous Substances.

Response No. 62. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 63. Used oil or waste oil used by You during the Relevant Period at Your Attleboro, Massachusetts facilities contained Hazardous Substances.

Response No. 63. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

Request No. 64. Used oil or waste oil from Your Attleboro, Massachusetts facilities that was disposed of by You during the Relevant Period contained Hazardous Substances.

Response No. 64. After reasonable inquiry, including a thorough document search and interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

V. Asbestos

Request No. 65. Asbestos is a Hazardous Substance.

Response No. 65. Admit.

Request No. 66. Asbestos from your Pawtucket, Rhode Island facilities was disposed of by You during the Relevant Period.

Response No. 66. After reasonable inquiry, including a thorough document search and

interviews with current and former employees, the information known or readily obtainable to Defendant is insufficient to enable Defendant to admit or deny this request for admission.

VI. Miscellaneous

Request No. 67. There have been releases of Hazardous Substances at the Site.

Response No. 67. Admit.

Request No. 68. The Site is a Facility as defined pursuant to Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

Response No. 68. Admit.

INTERROGATORIES

Interrogatory No. 1. For any request for admission set forth above that you do not unequivocally admit, state all facts upon which you base your response.

Answer No. 1. In response to this Interrogatory Defendant refers to the responses below.

Interrogatory No. 2. Identify Your employee(s) or former employee(s) who are knowledgeable about the arrangement of transportation of Hazardous Substances from the following facilities for Disposal during the Relevant Period:

- a. Your Pawtucket, Rhode Island facilities;
- b. Your Cumberland, Rhode Island facilities; and
- c. Your Attleboro, Massachusetts facilities.

Answer No. 2. The following individuals are knowledgeable about Defendant's waste disposal practices:

- a. Ron Sito; Arthur Laroach; John Grimaldi; Edward Lapati; and Herb Malin.
- b. Wilfred (Pit) Gravel; Tony Patrizio; Edith Barker; Hugh Aaron; and Ed Laflamme.

- c. Tony Patrizio; Gaines Hutcheson; Robert Durate; and Herb Malin.

Interrogatory No. 3. Identify the substances, residual or otherwise, present in the bags that You disposed of from the following facilities during the Relevant Period:

- a. Your Pawtucket, Rhode Island facilities;
- b. Your Cumberland, Rhode Island facilities; and
- c. Your Attleboro, Massachusetts facilities.

Answer No. 3. (a)-(c). The following new materials were contained in bags and were used in Defendant's manufacturing operations at its facilities during the Relevant Period: resins (primarily PVCs); fillers (primarily calcium carbonate and clay); various colorants; stabilizers; and organic acids (Attleboro only). During the Relevant Period it was Defendants' standard practice and procedure to thoroughly empty all new material bags prior to disposal of the empty bags.

Interrogatory No. 4. Identify the liquids present in the drums or barrels, sized 55-gallons or otherwise, that You disposed of from the following facilities during the Relevant Period:

- a. Your Pawtucket, Rhode Island facilities;
- b. Your Cumberland, Rhode Island facilities; and
- c. Your Attleboro, Massachusetts facilities.

Answer No. 4. (a),(c). Plasticizers and organic alcohols contained in 55-gallon steel drums were received at Defendants' Pawtucket and Attleboro facilities during the Relevant Period. Lubrication oils contained in 55-gallon steel drums were received at Defendants' facilities listed in (a) through (c) above during the Relevant Period. Defendant used the services of drum recyclers for the disposal of empty 55-gallon steel drums.

Interrogatory No. 5. Identify the powders that You disposed of from the following facilities during the Relevant Period:

- a. Your Pawtucket, Rhode Island facilities;
- b. Your Cumberland, Rhode Island facilities; and
- c. Your Attleboro, Massachusetts facilities.

Answer No. 5. See Response to Interrogatory No. 3 above.

Interrogatory No. 6. Identify the dust that You disposed of from the following facilities during the Relevant Period:

- a. Your Pawtucket, Rhode Island facilities;
- b. Your Cumberland, Rhode Island facilities; and
- c. Your Attleboro, Massachusetts facilities.

Answer No. 6. (a) – (c). Dust disposed of from the Pawtucket facility consisted primarily of compounded rubber dust from grinding operations associated with the manufacture of shoe soling and tire treading products. Dust collector dust from rubber operations was disposed of from operations at the Pawtucket facility. Floor sweeping dust was disposed of from all facilities. Dust collector dust from the manufacture of color concentrates was disposed of from the Cumberland facility.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request No. 1. Produce any and all Material Safety Data Sheets (“MSDSs”) regarding the following products or substances that You arranged for transport from either Your Pawtucket, Cumberland or Attleboro facilities during the Relevant Period:

- a. petroleum-based products;
- b. asbestos;

- c. dust;
- d. powders; or
- e. liquids.

Response No. 1. Defendant does not possess MSDSs from the Relevant Period responsive to this request.

Request No. 2. Produce any and all MSDSs regarding materials containing Hazardous Substances that You arranged for transport from either Your Pawtucket, Cumberland or Attleboro facilities during the Relevant Period.

Response No. 2. Defendant does not possess MSDSs from the Relevant Period responsive to this request.

Request No. 3. Produce any and all MSDSs regarding the following products or substances that were transported from either Your Pawtucket, Cumberland or Attleboro facilities during the Relevant Period for Disposal elsewhere:

- a. petroleum-based products;
- b. asbestos;
- c. dust;
- d. powders; or
- e. liquids.

Response No. 3. Defendant does not possess MSDSs from the Relevant Period responsive to this request.

Request No. 4. Produce any and all MSDSs regarding materials containing Hazardous Substances that were transported from either Your Pawtucket, Cumberland or Attleboro facilities during the Relevant Period for Disposal elsewhere.

Response No. 4. Defendant does not possess MSDSs from the Relevant Period responsive to this request.

Request No. 5. Produce any MSDSs regarding the following products or substances that were transported from either Your Pawtucket, Cumberland or Attleboro facilities during the Relevant Period for Disposal at the Site:

- a. petroleum-based products;
- b. asbestos;
- c. dust;
- d. powders; or
- e. liquids.

Response No. 5. Defendant does not possess MSDSs from the Relevant Period responsive to this request.

Request No. 6. Produce any and all MSDSs regarding materials containing Hazardous Substances that were transported from either Your Pawtucket, Cumberland or Attleboro facilities during the Relevant Period for Disposal at the Site.

Response No. 6. Defendant does not possess MSDSs from the Relevant Period responsive to this request.

Request No. 7. Produce any and all MSDSs regarding the following products or substances that were used at either Your Pawtucket, Cumberland or Attleboro facilities during the Relevant Period:

- a. petroleum-based products;
- b. asbestos;
- c. dust;

d. powders; or

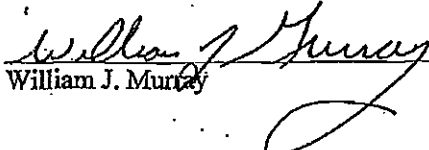
e. liquids.

Response No. 7. Defendant does not possess MSDSs from the Relevant Period responsive to this request.

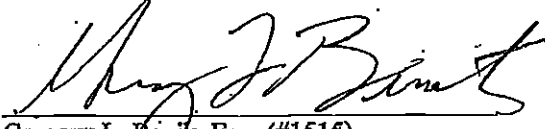
VERIFICATION

I, William J. Murray, Executive Vice President, Teknor Apex Company, do hereby verify the foregoing responses of Teknor Apex Company to Plaintiffs' Requests for Admission, Interrogatories, and Requests for Production of Documents to Teknor Apex Company for and on behalf of Teknor Apex Company, noting that certain matters stated herein are not within my personal knowledge, and that responses have been prepared by authorized agents and employees of and counsel for, Teknor Apex Company. I am informed that such responses are true and correct.

Signed under the penalties of perjury this 27 day of January, 2010.

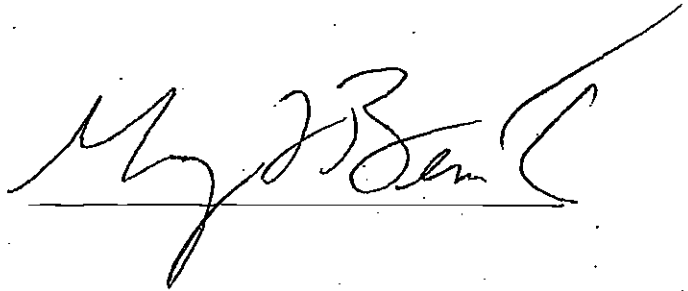

William J. Murray

Signed as to Objections


Gregory L. Benik, Esq. (#1515)
Benik & Associates, P.C.
931 Jefferson Boulevard
Suite 2008
Warwick, RI 02886
(401) 454-0054
(401) 732-5054 fax

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of January, 2010, I served via e-mail a copy of Defendant Teknor Apex Company's Responses to Plaintiff's Requests for Admission, Interrogatories, and Request for Production of Documents to all counsel of record.



TEKNOR APEX CO.-HEBRONVILLE-WASTE-

RKM
8/2/85

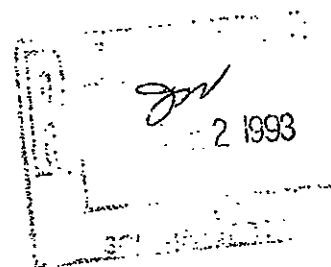
DESCRIPTION	AMOUNT GENERATED	COMPOSITION	REMARKS
SPENT ALCOHOL FROM PROCESS	APPROX 15,000 GALS/YR	C6 TO C13 ALCOHOLS, HYDROCARBONS, KETONES, ETC	BOTH ① & ② WERE COMBINED AND BURNED IN THE PAST - APPLICATION LETTER BEING PREPARED TO RESUME BURNING
RECOVERED "PIT" OIL - (TOP LAYER FROM CONCRETE SEPARATOR)		ALCOHOLS, PLASTICIZER OILS, MISCELLANEOUS DECOMPOSITION PRODUCTS	
SLUDGE FROM BOTTOM OF CONCRETE SEPARATOR	PUMPED OUT 10 YRS AGO NOW 35 CUBIC YARDS. APPROX.	50% WATER, 25% PIT OIL, 25% SOLIDS (PVC RESIN, MISCELLANEOUS PIGMENTS (METAL OXIDES AND ORGANIC COMPOUNDS))	E.P. TOXICITY TEST WILL BE PERFORMED.
SLUDGE FROM TOP OF "D.A.F."	APPROX 5-25#/DAY	FERRIC HYDROXIDE, BENTONITE CLAY, WATER, "PIT OIL"	FILTERED AND DISCARDED DAILY.
PRESS CAKE	1000#/DAY-	50% DIATOMACEOUS EARTH AND CARBON 50% PLASTICIZER OILS	SOME IS DISCARDED SOME IS USED AS A FILLER IN PVC COMPOUND
DUST FROM 2 DUST COLLECTORS IN COLOR DEPT.	400#/DAY-	CARBON BLACK FROM ONE MISCELLANEOUS PIGMENTS FROM THE OTHER	DISCARDED - EPTOX. TEST WILL BE PERFORMED.
NAPHTHALENE (FROZEN) IN OLD DRUMS	135 DRUMS (55GAL) EACH ABOUT 1/2 FULL	CRUDE NAPHTHALENE	- ONE SHOT PROBLEM -
NAPHTHALENE (FROZEN) IN OLD TANK	APPROX 2-3,000 GALLS	CRUDE NAPHTHALENE	- ONE SHOT PROBLEM -
DEMOLITION OF OLD PIPING AND EQUIPMENT WHICH CONTAINS SOME CHEMICALS IN FROZEN STATE	UNKNOWN	CRUDE NAPHTHALENE CRUDE PHTHALIC ANHYDRIDE (Na NO ₂ - Na NO ₃) SALT	- ONE SHOT PROBLEM OVER SEVERAL YEARS AS EQUIPMENT IS DEMOLISHED
DILY SOIL FROM PERIMETER OF COOLING POND	UNKNOWN	ALCOHOLS AND PLASTICIZER OILS + SOIL -	- ONE SHOT PROBLEM - - WORKING TO PREVENT COOLING WATER CONTAMINATION IN PROCESS -
WASTE OILS - LUBE & CUTTING OILS		LUBE & CUTTING OILS	PICKED UP BY LOCAL DEALER WHEN 4-55GAL





TEKNOR APEX COMPANY

February 1, 1993



Mr. John Winkler
Department of Environmental Protection
Southeast Region
Lakeville Hospital
Lakeville, Massachusetts 02347

Dear Mr. Winkler:

In accordance with Paragraph 60 of the consent decree between Teknor Apex and the Commonwealth of Massachusetts dated August 6, 1992, enclosed are two copies for your review and approval of a scope of work for a Toxic Use Reduction and Compliance (TURAC) analysis. The original Scope of Work was submitted September 11, 1992. This submittal includes additional information as requested by the DEP.

If you have any questions or comments, please notify me at:

Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861

or call me at 401-725-8000, extension 233.

Very truly yours,

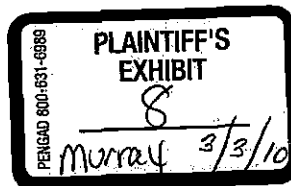
TEKNOR APEX COMPANY

Lorraine Braunsdorf

Lorraine Braunsdorf
Environmental Project Manager

LB/bjt

cc: Robert Duarte
Ross Van Royen
Herb Malin w/o attachment
Bill Murray w/o attachment
Phil Morse w/o attachment
Phil Sussler, Rubin and Rudman
Bruce Maillet, Wehran



SCOPE OF WORK FOR
TOXIC USE REDUCTION AND
COMPLIANCE ANALYSIS

TEKNOR APEX COMPANY
OAK HILL AVENUE
ATTLEBORO, MASSACHUSETTS 02703

FEBRUARY, 1993

As part of the recent consent decree between Teknor Apex and the Commonwealth of Massachusetts, Teknor Apex is required to submit a Toxic Use Reduction and Compliance (TURAC) analysis. On January 8, 1993, a meeting between DEP and Teknor Apex occurred to review the submission of the September 14, 1992 TURAC Scope of Work. Various revisions and requests were made by the DEP to be included in the Scope of Work. This revised document is intended to fulfill the requirements of the TURAC Scope of Work.

PRODUCTION UNITS AND COVERED CHEMICALS

The Toxic Use Reduction and Compliance Plan for the Hebronville plant will cover all chemicals that are regulated by the DEP. These chemicals specifically include eight listed chemicals that require a Form S submittal as well as any other chemical that is regulated by the DEP, including VOCs, particulates or even Oil and Grease in the water streams. A study of the raw material and product emissions reduction potential will be made.

All such chemicals used in the plant are found in one of two different production units, the plasticizer area and the color area. The unit of product for the plasticizer area is pounds of plasticizer, and the unit of product for the color area is pounds of the final color concentrate.

Plasticizer production occurs in production unit #1. Plasticizer is produced by a chemical reaction known as esterification. The reaction occurs between alcohols and acids/anhydrides. Plasticizers and water are the reaction products. There are approximately 20 types of alcohols, anhydrides and acids used as raw materials and there are approximately 35 types of plasticizers produced at the Attleboro plant. Out of these chemicals in the plasticizer production unit, there were four reportable TURA chemicals in 1991. These were phthalic anhydride (a raw material), adipic acid (another raw material), di(2-ethylhexyl)phthalate (a plasticizer- a reaction product) and bis(2-ethylhexyl)adipate (another produced plasticizer). The base year for performing calculations for adipic acid is 1991, for the other chemicals, 1990 is the base year.

Production area #2 is known as the color area. This department is a plastic mixing operation that produces over 10,000 various color concentrates, conductive vinyls and polyolefins consisting of approximately 1000 raw materials including color pigment, resin, plasticizers, stabilizers, and other fillers. Most raw materials are in a powder form. In this production unit there were also four reportable Form S compounds in 1991. These were butyl benzyl phthalate (a purchased plasticizer), barium compounds, chromium compounds, and lead compounds. The base year for the calculations will be 1990 for four chemicals.

Even though there are only eight specific TURA chemicals between the two production units, all DEP regulated materials will be covered. However even though there is a continually changing product base, the production process remains the same. Therefore, even if the teams concentrate on the eight specific TURA regulated chemicals, the entire plant will benefit. For example any housekeeping or process change that is implemented will result in reducing waste for more than just TURA regulated chemicals.

TUR POLICY STATEMENT AND GOALS

The TURAC Plan will begin with a policy statement from management committing to Toxic Use Reduction at the Hebronville plant. TUR goals will then be set for each chemical. These goals will include an overall reduction in byproduct generation as well as the expected change (actual pounds and percentage) in the use of each of the eight TURA chemicals as well as the expected change (pounds and percentage) of the generated byproducts from the use of these chemicals.

All employees will be notified of TURA process and will be given the opportunity to provide input to the plan.

TUR PLANNING TEAM

Projects that cover and utilize TURA goals can come from any part of Teknor Apex's corporation and can utilize any employee of the corporation such as Teknor's Laboratory in Pawtucket, RI where research and development occurs or from the corporate engineering department. However, in order to directly facilitate the TURAC program, two TURA teams will also be organized. One team will

specifically deal with the color production unit and the other team will cover the plasticizer production unit. The people on the team will review all aspects of production. Team members will be a combination of employees from the Hebronville plant as well as members from the corporate staff from Pawtucket, RI. Figure 1 shows an organizational chart of the two teams. The team members for the color team will consist of the Hebronville Plant Manager, the Color Production Supervisor, a production employee from the color department, the Director of Manufacturing for Teknor Color Company, an Environmental Engineer, and a Senior Financial Analyst. The team members for the plasticizer team will consist of the Hebronville Plant Manager, the Plasticizer Production Supervisor, a production employee from the plasticizer department, the Analytical Lab Manager, an Environmental Engineer, and a Senior Financial Analyst. These team members will give a well rounded aspect to each team when dealing with TURA methods such as chemical substitutions, environmental regulations, cost accounting and the production process, housekeeping, etc. Other Teknor employees will be invited to team meetings on an as needed basis. These people will include such people as maintenance, engineering and laboratory personnel. Teknor has also been in contact with the Office of Technical Assistance and are planning on working with them in dealing with TURAC. Outside consultants such as Wehran Engineering will be used as needed as well as outside vendors.

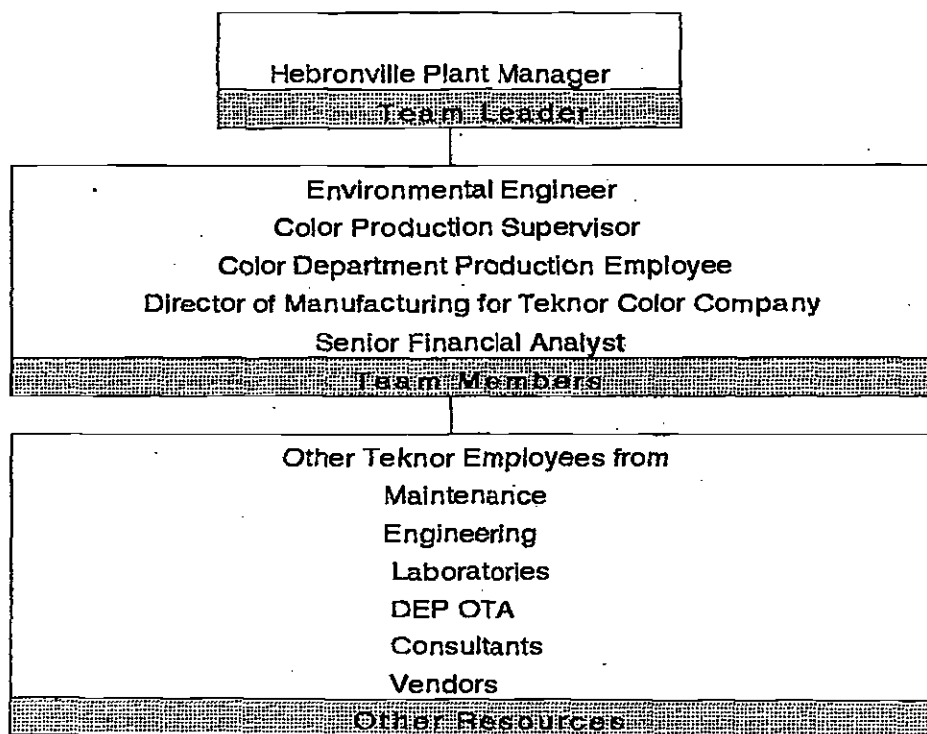
Each team will be given clear objectives and there is a clear relationship to the manager who will implement the decisions of the team. This is demonstrated by the fact that the Plant Manager is a member of the team. Teams will be meeting at a frequency of at least once per month with meetings scheduled more frequently as needed. One team member on each team will be responsible for keeping and distributing meeting minutes in order to document the team's activities and to facilitate production of the TURAC document.

PRODUCTION UNIT INFORMATION

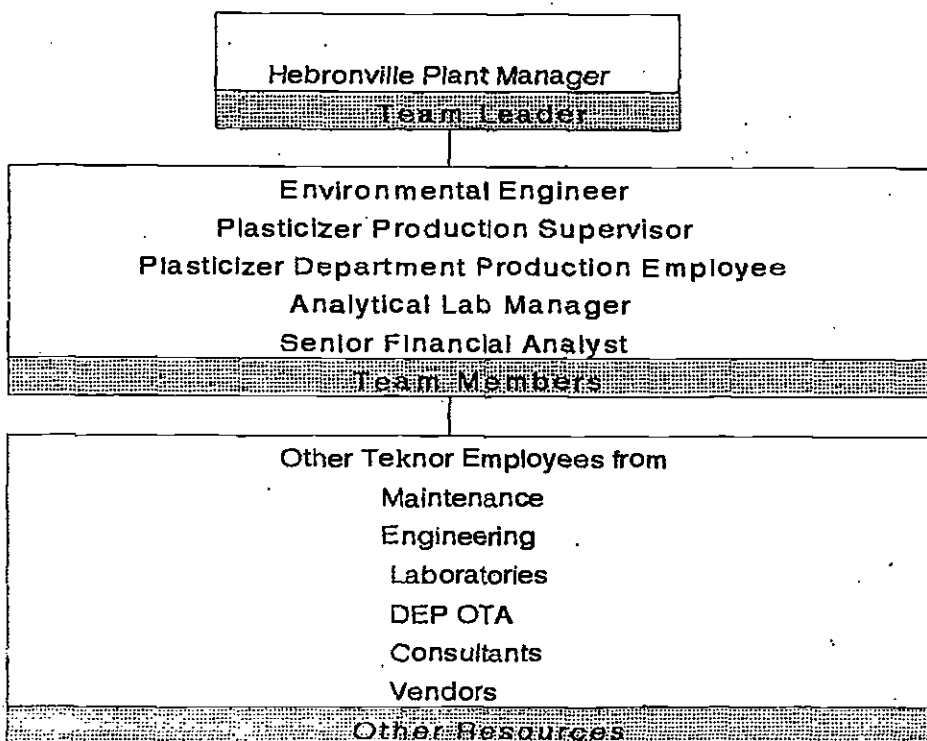
After the team has been organized, the production processes will be analyzed. Included in this analysis is characterizing the process. A TUR flow diagram will be developed for each production unit. The diagrams will show where all raw materials are added, final products removed as well as the locations of all waste streams and into which medium (air, land, water) the byproducts enter. The flow diagrams will be reviewed with the hourly production employees in order to allow the people most familiar with the process to help confirm that the diagrams are accurate and that the byproducts are accurate.

Figure 1
TURAC TEAM

Color Area Team



Plasticizer Area Team



Materials accounting will be developed for each of the units. As part of the materials accounting, technical information will be studied (production records, scheduling records, operating manuals, raw material and customer specifications, etc.), waste streams will be analyzed, products defined, and byproducts identified. Actual production numbers as well as engineering judgement will be used in determining the materials accounting. Note that the production at the Hebronville plant (both color and plasticizer) are batch processes with a continual change in the manufactured products. As such, a materials accounting alone may not give the accuracy desired for the TURAC program. However, by performing materials accounting, the points where the TURAC chemicals are lost as well as approximate byproduct amounts will be identified. This information will then be used in the TURAC analysis. Specific amounts identified from the materials accounting will include the total amount of regulated chemicals used in the process, the amount of material generated as a byproduct and the amount of each material released or transferred off site as an emission.

COST OF TOXICS

The cost associated with each TUR chemical will involve five areas of cost. These include determining the operating costs associated with the current operation, identifying the operating costs which could change by implementing the TUR idea, calculating the difference in cost between the current and proposed system, determining the cost in capital of the proposed project, and calculating the payback period of the proposed project. Costs will include both direct and indirect costs and will be determined on a yearly basis for both total cost per year of the TUR chemical as well as the cost of the chemical per unit of product.

TUR ALTERNATIVES IDENTIFICATION

Once the process study has been completed various TUR options can be developed. A brainstorming session will be held with each of the TURA teams. The brainstorming session will identify various areas where toxic use reduction activities can be employed to minimize the TUR chemical usage and byproduct reduction. The teams will have reviewed the process flow diagram prior to the brainstorming sessions so the teams can concentrate on making changes based on areas where larger amounts of by-products and emissions occur. The TUR techniques identified will be under one of six different areas of TUR options. These include input substitution, product reformulation, process redesign, process modernization, improved operations and maintenance, and in-process recycling and reuse.

TUR ALTERNATIVES ANALYSIS

Once a list of TUR alternatives have been developed, the evaluation step will begin. The evaluation of each option will include a technical and an economic evaluation. An initial screening will be used to eliminate unfeasible options. These would include items that are not considered TUR as well as items that are not either technically or economically feasible or that are prohibited by environmental or occupational safety laws or regulations. After the initial screening is complete, a more involved technical, managerial, and cost assessment will occur. The technical assessment will include consideration of worker health and safety issues as well as an evaluation of the regulatory constraints posed by each option considered. The process that will be employed to analyze the projects can be found in Figure 2. Any project that is not chosen will have a reason for the rejection and depending on where the project is rejected in the evaluation, a cost analysis will be performed.

PROJECT SELECTION AND IMPLEMENTATION

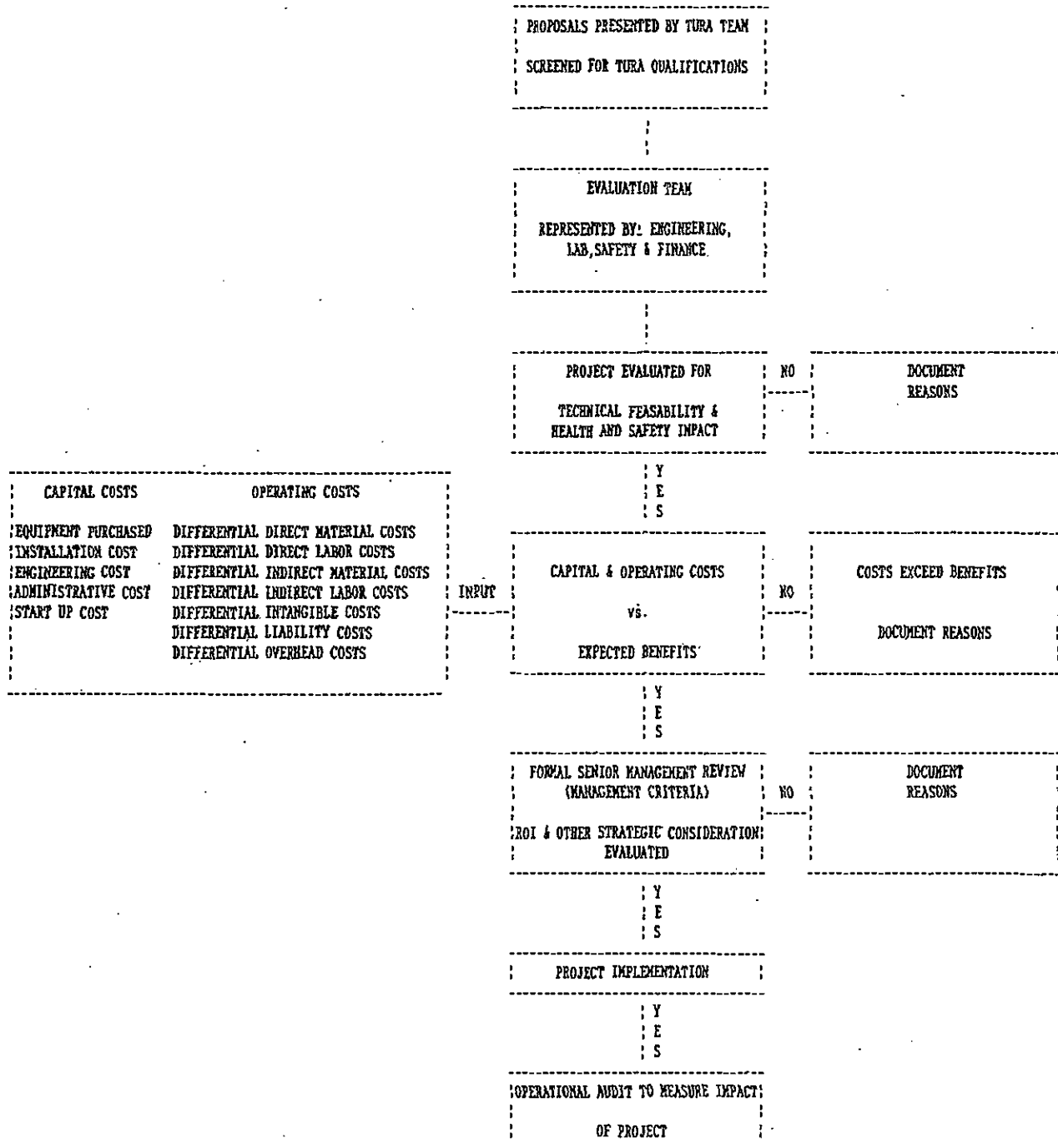
Once the alternative analysis has been completed, project selection will occur. An implementation schedule will also be developed for all projects that are chosen. An explanation will be developed for any projects that are not chosen for implementation.

TIMING FOR THE TURAC ANALYSIS

As of January 8, 1993, the TURA teams have been finalized and meetings have begun. The teams formally meet approximately once per month. The month time period allows progress to be achieved between meetings. Currently there have been various workshop meeting held between formal meetings as well as meeting amongst all the production employees to review the current production process and waste producing areas. The next step for the teams is to begin brainstorming ideas and begin analyzing the ideas. A draft TURAC analysis is due to the DEP 120 days after the Scope of Work has been approved.

FIGURE 2

TURA PROJECT EVALUATION PROPOSAL



An approximate time table is as follows:

<u>Day</u>	<u>Milestone</u>
0	DEP approval of scope Process flow diagrams are complete Materials accounting complete in March Brainstorming sessions- Feb. and March Complete initial screening--April Start alternative analysis--April/May
120	Draft TURAC completed and sent to DEP



TEKNOR APEX COMPANY

Oak Hill Ave. Attleboro, MA 02703
PAWTUCKET, RHODE ISLAND 02862

August 22, 1985

RECEIVED
AUG 24 1985

COMMONWEALTH OF MASSACHUSETTS

Department of Environmental Quality Engineering

Southeast Region

Lakeville Hospital, Lakeville, MA 02346

Attention: Christopher Tilden

RE: Interim Report - Notice
of Violations Hazardous
Waste Site MAD/000211458
Dated August 5, 1985

Dear Sir,

This letter will confirm the information presented to you at the meeting of August 15, 1985 at Lakeville.

Teknor Apex Company submitted a Part A Hazardous Waste Permit application to EPA on 11-17-80. After much discussion with EPA, it was returned to us with a letter dated April 15, 1981, signed by Richard C. Boynton, Chief, Permits Development Section, with a copy to MA DEQE informing us that we need not apply - copy of letter is enclosed.

We believe that we are not a large quantity generator. We do generate some hazardous waste - the quantity remains to be determined after completion of tests, to be described later in this letter, by certified independent laboratories. At this time, I would like to point out that the above tests could be done a lot faster and equally, if not more expertly, by our own well-equipped analytical laboratory.

Our major waste stream is "Spent Alcohol". We use C-6 to C-13 alcohols to produce plasticizers. An excess amount of alcohol used in one batch is recovered and used into the next. At some point this material becomes saturated with unreactive components and is no longer economical to recycle. It is then neutralized with caustic soda, dried, filtered and trucked to the boiler room for burning in our high pressure steam boilers. It is an excellent, clean fuel - see sample #1 in the enclosed lab report from E.W. Saybolt.

As you note in your letter, we can no longer burn this material until we obtain a permit from the Air Quality Control Section. We are working diligently to gather the necessary information to apply for a permit. Meanwhile, we believe this material is not a hazardous waste. It is a clear filtrate with no heavy metals, has a flash point above 140°F and does not fall into any of the hazardous waste categories. We plan to have it analyzed for "Priority Pollutants" to confirm our position.



Another waste stream is the distillation bottoms from the material skimmed from the settling basins - item #6 from your letter. The material skimmed is 90% alcohol which is distilled-off and recycled. The bottoms is slightly contaminated plasticizer. In the past, this material was either used as a finished product or combined with "Spent Alcohol" and burned - it is also a good fuel - sample #2 in the E. W. Saybolt report. In the future this material will be used as a finished product.

The third waste stream is "Waste Oil". We generate approximately 1 drum per month. This also was combined with "Spent Alcohol" and burned - all material was neutralized, dried and filtered before burning.

There are three major reasons why there was an excess of material on hand at the time of inspection. First, we had just finished rebuilding some equipment and had drained the oil before the equipment was moved - items #1 and 2. The second reason is simply poor accounting practice. Eight of the nine drums outside Maintenance, item #3 in your letter, were empty. The one outside V-2 had 1 or 2 inches of oil on top and the rest was water. The third reason, of course, is that we could no longer burn it. In any case, after all the oil that could be found in the plant had been consolidated, resulting in 8 full drums, it was removed by Samson Oil on 7/22/85. The drums are now properly labeled and accounted.

✓ We have contacted MacDonald and Watson Waste Oil Co. to remove the soil contaminated with waste oil - item #4. They have requested that we have it analyzed for EP Toxicity (heavy metals only) and flash point. As soon as we have the results we will schedule a date for removal of the soil with MacDonald and Watson and will notify DEQE of the same.

Our last waste stream is the sludge from the water treatment plant. This plant was built with the approval and in cooperation with EPA and has served as a model for other companies. The process is to form a floc with bentonite clay, ferric chloride and polyelectrolite. The floc is air floated and skimmed. It is dewatered under vacuum in an open trough. The sludge is well over 30% solids. We generate 5 to 25 pounds per day.

* ✓ Until now it was being dumped with the rest of the trash to the city land fill. We believe it is not hazardous. We plan to have it tested by Cambridge Analytical Associates for EP Toxicity (metals only - there's no reason to believe that any pesticides would be present in our effluent) and Volatile Organics: GC Method 601, Chlorinated Organic Compounds, and 602, Aromatic Volatile Organics.

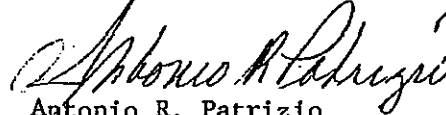
The carbon black and diatomaceous earth in item #7 are used to treat the plasticizer and facilitate filtration. At the end of filtration, the presses are blown with compressed air for over 1 hour to dry the residue which is then used as a filler in one of our product line. The spilled material was picked up immediately after the inspection.

We will designate a hazardous waste storage area and comply with the requirements enumerated in items 8, 9, 10 and 11. One month should be sufficient to comply with the foregoing items. Item #12 does not apply.

Unless we hear from you to the contrary by August 30th, we will assume that the foregoing is acceptable to DEQE and proceed as planned.

Very truly yours,

TEKNOR APEX COMPANY



Antonio R. Patrizio
Plant Manager

ARP:da

Enclosures

CC: Vaughan Steeves
DEQE - Lakeville, MA

Phil Ripa
DEQE - Lakeville, MA

James P. Mooney, Health Agent
25 South Main St.
Attleboro, MA 02703

David Berry
Div. of Solid and Hazardous Wastes



TEKNOR APEX COMPANY

PAWTUCKET, RHODE ISLAND 02862

RECEIVED

FEB 11 1981

February 9, 1981

U.S. DISTRICT COURT

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Dept. of Environmental Quality Engineering
Southeast Region
Lakeville Hospital, Lakeville, Ma. 02346

ATTN: Mr. White

Dear Sir:

Per your request, enclosed is a photocopy of the lab results obtained
on the analysis of the sludge from water treatment plant.

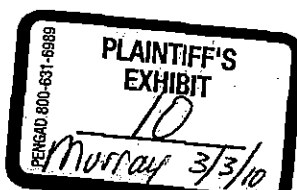
Very truly yours,

TEKNOR APEX COMPANY

Antonio R. Patrizio
Antonio R. Patrizio
Plant Manager

ARP:ad

ENC.



MEMORANDUM

TO: A. Patrizio

DATE: 1/12/81

FROM: J. Buono

CC: H. Malin
J. EdenbaumSUBJECT: EP Toxicity Test of Hebronville Pit Sludge

A representative sample of the sludge was extracted as per the EP Toxicity Test, Appendix II, 40 CFR 261.24 and the extract analyzed for trace elements. The results obtained were as follows:

Element	Concentration found (mg/liter)	Max. Concentration for Characteristic EP Toxicity (mg/liter)
As	-	5.0
Ba	0.30	100.0
Cd	0.12	1.0
Cr	0.01	5.0
Pb	0.08	5.0
Hg	-	0.2
Se	0.12	1.0
Ag	-	5.0

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

BIENNIAL REPORT FOR THE YEAR 1989

Please read instructions before entering information on report

1. Generator Name: Teknor Apex Company
2. EPA Identification Number: R I D 0 4 5 3 6 7 9 6 8
3. Mailing Address: 505 Central Avenue, Pawtucket, RI 02861
4. Site Location: Mendon Ave., Pawtucket, RI 02861 ☐ same
5. Telephone Number: (401) 725-8000 ext. 2996. SIC Code: 2 8 2 1
7. Contact Person and Title: Ron Sito Safety Manager
8. Status: Check the box/boxes that apply to your company in 1989
 - A. ☒ Large generator >1000 kg/month
 - B. ☐ Generate 100 - 1000 kg/month
 - C. ☐ Generate <100 kg/month
 - * Note: 200 kg equals approximately 55 gallons (1 drum)
 - D. ☐ Waste oil generated only
 - E. ☐ Parts cleaner/Dry cleaner waste only
 - F. ☐ Contaminated gasoline only
 - G. ☐ Transporter
 - H. ☒ Generated waste in 1989 but did not yet ship off-site
If so, list descriptions and amounts approx. 2000 gals.
waste oil 3 gals. waste petroleum
 - I. ☐ Did not generate any hazardous waste in 1989, but distillat
will in the future
 - J. ☐ No longer generate waste, cancel my EPA ID number
 - K. ☐ Out of business since _____
 - L. ☐ Moved to _____ Date _____
 - M. ☐ Never generated hazardous waste/one-time generation
only, cancel my EPA ID number

Page 1 of 7



RECEIVED

MAR 30 1990

TA00705

Please use the space below to list any company changes that we should be made aware of (i.e. business name, ownership, etc.)

* Note: If more than one facility is used, copy this page and complete for each facility.

9. Facility receiving waste: Chem Pak

10. Facility EPA Identification Number: R I D 0 8 4 8 0 2 8 4 2

11. Facility Address: 167 Mill St. Cranston, RI 02905

12. HAZARDOUS WASTE IDENTIFICATION:

Description of waste	EPA/State waste #	Amounts	Units	Physical state	Ultimate disposal
=====					
Waste petroleum					
a. <u>Distillate</u>	<u>D 0 0 1</u>	<u>52</u>	<u>G</u>	<u>L</u>	<u>R</u>
b. _____	<u>- - - -</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
c. _____	<u>- - - -</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
d. _____	<u>- - - -</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
e. _____	<u>- - - -</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
f. _____	<u>- - - -</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

13. Comments, explanations, additional information (include line number where applicable):

14. CERTIFICATION: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and 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 substantial penalties for submitting false information, including the possibility of a fine and/or imprisonment.

Name Printed: Ron Sito Title: Safety Manager

Signature:  Date: 3/19/90

Please use the space below to list any company changes that we should be made aware of (i.e. business name, ownership, etc.)

* Note: If more than one facility is used, copy this page and complete for each facility.

9. Facility receiving waste: Olson's GR

10. Facility EPA Identification Number: M A D O 5 9 7 3 3 3 7 8

11. Facility Address: 590 South St. Raynham, Mass. 02767

12. HAZARDOUS WASTE IDENTIFICATION:

Description of waste	EPA/State waste #	Amounts	Units	Physical state	Ultimate disposal
a. <u>waste petroleum</u>	<u>M A O 1</u>	<u>400</u>	<u>G</u>	<u>L</u>	<u>B</u>
b. _____	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
c. _____	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
d. _____	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
e. _____	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
f. _____	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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Name Printed: Ron Sito Title: Safety Manager

Signature: *Ron Sito* Date: 3/19/90

Please use the space below to list any company changes that we should be made aware of (i.e. business name, ownership, etc.)

* Note: If more than one facility is used, copy this page and complete for each facility.

9. Facility receiving waste: Delaware Container Co.

10. Facility EPA Identification Number: P A D 0 6 4 9 8 1 9 8 8

11. Facility Address: W. 11-th Avenue & Valley Road, Coatesville, PA 19320

12. HAZARDOUS WASTE IDENTIFICATION:

Description of waste	EPA/State waste #	Amounts	Units	Physical state	Ultimate disposal
"RQ" waste	FO03				
a. <u>flammable liquid</u>	<u>FO05</u>	<u>1430</u>	<u>G</u>	<u>L</u>	<u>B</u>
b. _____	_____	_____	_____	_____	_____
c. _____	_____	_____	_____	_____	_____
d. _____	_____	_____	_____	_____	_____
e. _____	_____	_____	_____	_____	_____
f. _____	_____	_____	_____	_____	_____

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Name Printed: Ron Sito Title: Safety Manager

Signature:  Date: 3/19/90

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* Note: If more than one facility is used, copy this page and complete for each facility.

9. Facility receiving waste: Lionetti Oil Recovery Inc.

10. Facility EPA Identification Number: N J D 0 8 4 0 4 4 0 6 4

11. Facility Address: Runyon & Cheesquake Rds. Old Bridge, NJ

12. HAZARDOUS WASTE IDENTIFICATION:

Description of waste	EPA/State waste #	Amounts	Units	Physical state	Ultimate disposal
waste oil					
a. <u>combustible liq.</u>	<u>X726</u>	<u>2420</u>	<u>G</u>	<u>L</u>	<u>B</u>
b. _____	_____	_____	_____	_____	_____
c. _____	_____	_____	_____	_____	_____
d. _____	_____	_____	_____	_____	_____
e. _____	_____	_____	_____	_____	_____
f. _____	_____	_____	_____	_____	_____

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Name Printed: Ron Sito Title: Safety Manager

Signature:  Date: 3/19/90

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* Note: If more than one facility is used, copy this page and complete for each facility.

9. Facility receiving waste: B & L Oil Inc.

10. Facility EPA Identification Number: N J D @ 6 4 9 8 1 9 8 8

11. Facility Address: 472 Freling Huysen Ave., Newark, NJ

12. HAZARDOUS WASTE IDENTIFICATION:

Description of waste	EPA/State waste #	Amounts	Units	Physical state	Ultimate disposal
waste oil, nos. X721					
a. <u>combustible liq.</u>	<u>M001</u>	<u>2625</u>	<u>G</u>	<u>L</u>	<u>B</u>
b. _____	_____	_____	_____	_____	_____
c. _____	_____	_____	_____	_____	_____
d. _____	_____	_____	_____	_____	_____
e. _____	_____	_____	_____	_____	_____
f. _____	_____	_____	_____	_____	_____

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Name Printed: Ron Sito Title: Safety Manager

Signature:  Date: 3/19/90

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* Note: If more than one facility is used, copy this page and complete for each facility.

9. Facility receiving waste: Baum Gardner Co.

10. Facility EPA Identification Number: P A D Q 1 3 9 4 4 6 7 3

11. Facility Address: 1514 Black Gap Rd., Fayetteville, PA

12. HAZARDOUS WASTE IDENTIFICATION:

Description of waste	EPA/State waste #	Amounts	Units	Physical state	Ultimate disposal
=====					
waste oil					
a. <u>combustible</u>	<u>liq. M O O 1</u>	<u>3725</u>	<u>G</u>	<u>L</u>	<u>B</u>
b. _____	<u>- - - -</u>	_____	_____	_____	_____
c. _____	<u>- - - -</u>	_____	_____	_____	_____
d. _____	<u>- - - -</u>	_____	_____	_____	_____
e. _____	<u>- - - -</u>	_____	_____	_____	_____
f. _____	<u>- - - -</u>	_____	_____	_____	_____

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TEKNOR APEX COMPANY

PAWTUCKET, RHODE ISLAND 02862

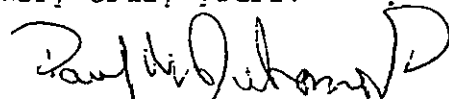
December 10, 1991

Mr. James C. McCaughey, Sr. Engineer
Department of Environmental Management
291 Promenade Street
Providence, R.I. 02908-5767

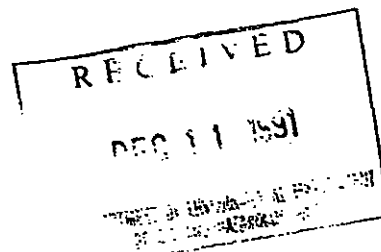
Dear Mr. McCaughey:

Attached please find completed TCLP Analyses for 12 dust
collectors at our plant site.

Very truly yours,


Paul M. Dubanowicz

PMD/lit



TA00682

TEKNOR APEX COMPANY
HEBRONVILLE RESEARCH LABORATORY
ANALYSIS REPORT

TO: P. Dubanowitz/F. Summers

DATE: 12/2/91

CC: H. Malin/J. Andries

FROM: J. Buono

REPORT NO: 1410-55

SAMPLE: 12 Samples from various dust collector units taken at the
Pawtucket, R.I. plant

REFERENCE NO A-7453 and A-7453 (AW)

TYPE OF ANALYSIS TCLP Metal Analysis

Twelve samples obtained from various dust collector units at the Pawtucket plant were extracted according to EPA method 1311 TCLP. The extracts were analyzed by atomic absorption spectrophotometry and the results were as follows:

<u>Sample</u>	<u>Concentration (PFM)</u>						
	As	Se	Ba	Cd	Pb	Cr	Ag
1) 01 Central Ave. "A" Farm Dust Collector	<0.05	<0.05	0.10	<0.05	<0.05	<0.05	<0.05
2) 03 Central Ave. Plas. Dept. Sly Dust Col.	<0.05	<0.05	0.30	<0.05	0.10	0.08	<0.05
3) 349 Central Ave. Lead area Mikropul Dust Col.	<0.05	<0.05	240.0	176.0	12.5	0.08	<0.05
4) 350 Central Ave. #6 & #9 Plas. dept. dust Col.	<0.05	<0.05	3.23	0.47	11.29	0.06	<0.05
5) 351 Central Ave. Plas. ribbon blend. for #5,7&8	<0.05	<0.05	74.0	29.9	34.4	0.06	<0.05
6) 455 Central Ave. Soling ribbon blend. (495-1020)	<0.05	<0.05	0.31	0.14	0.54	0.21	<0.05
7) 470 Central Ave. 1105 Blenders-Hose Dept.	<0.05	<0.05	10.2	10.4	0.20	0.15	<0.05
786 Central Ave. #1 Banbury	<0.05	<0.05	0.07	<0.05	1.75	<0.05	<0.05

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<u>Sample</u>	<u>Concentration (PPM)</u>						
	As	Se	Ba	Cd	Pb	Cr	Ag
9) 665 Central Ave. Classifier Line 6	<0.05	<0.05	0.20	<0.05	12.7	<0.05	<0.05
10) 835 Central Ave. #1 Banbury Bucket Hoist	<0.05	<0.05	0.10	0.05	<0.05	<0.05	<0.05
11) 1029 Central Ave. Garden Hose Extrusion Cumberland	<0.05	<0.05	0.50	<0.05	0.86	<0.05	<0.05
12) 4-1 & 4-2 Banbury Pangborn Dust Collector	<0.05	<0.05	0.79	<0.05	0.12	0.20	<0.05
13) Regulatory Levels	5.0	1.0	100.0	1.0	5.0	5.0	5.0

TA00684



State of Rhode Island and Providence Plantations
Department of Environmental Management
Division of Waste Management
291 Promenade Street
Providence, R.I. 02908

December 29, 1995

Laura Salamy
Environmental Manager
TEKNOR APEX, INC.
505 Central Avenue
Pawtucket, RI 02861

RE: Road Spill of October 31, 1995

Dear Ms. Salamy:

On Tuesday morning, October 31, 1995 this Division responded to spill of chemical material and other packaging debris on RI Route 10 south/Route 6 west split in the Olneyville section of Providence. At the scene it was determined that a truck belonging to McCaughey Standard Inc., carrying wastes from TEKNOR APEX, INC., was en route to its transfer station when some waste became dislodged from the truck and was released on the roadway. Both dry chemical materials and packaging bags were observed on the road surface. Samples were taken of both the chemical material and bags.

Samples were split with yourself and other company representatives. The packaging bags were labelled Ammonium OctaMolybdate, Antimony Trioxide and N-cyclohexylthiophthalimide. Analytical chemical tests of loose material found at the scene indicate the presence of Antimony at approximately nineteen times the maximum background level. Also, the presence of Molybdenum was found to be about 250 ppm. These findings give this Department sufficient reason to believe that there was chemical material as described on the bags in the waste container and on the roadway in addition to the talc material which you directed our attention to.

Our research indicates that Antimony and its compounds are regulated by OSHA as hazardous (29 CFR 1910.1000). Although sufficient data is not available to conclude that this material meets the definition of a state regulated hazardous waste, it nevertheless is considered a pollutant by several programs of this Department and the release of which is potentially punishable by fine and remediation.

Telephone 401-277-2797 TDD 277-6800



TA00701

In telephone conversation you referred to the "empty container rule" (40 CFR 261.7). Although this point may not be at issue since we are not concluding these wastes are hazardous, the rule does also state that *...a container...is empty if...all wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g. pouring, pumping aspirating...* Based on evidence found at the scene of the incident, we would conclude that every practical effort was not made to empty these bags.

The excessive amount of chemical material found in your trash waste indicates inadequate or possibly negligent waste management. We hope, and expect, that your company will institute practices to prevent the possibility of such an occurrence in the future.

This Division plans no further action; however, we are referring this incident to the Occupational Safety and Health Division of the Rhode Island Department of Labor.

Sincerely,



Thomas Epstein
Supervising Engineer
Division of Waste Management

teknor.ltr

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