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TDD # F1-8006-01

MASTER FILE

Date: _____

PRELIMINARY SITE ASSESSMENT

of

WOBURN STEEL DRUM, INC.
7 HARLOW COURT
WOBURN, MASSACHUSETTS

Submitted to:
Merrill S. Hohman, Director
Air and Hazardous Materials Division
U.S. EPA, Region I

Submitted by:
David Cook, Project Leader
Ecology and Environment, Inc. (E & E)
FIT Team, Region I

Date Submitted:
August 6, 1980

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ADMINISTRATIVE RECORD

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PRELIMINARY SITE ASSESSMENT

WOBURN STEEL DRUM, INC.

TDD #: F1-8006-01

Firm Name: Woburn Steel Drum, Inc.

Address: 7 Harlow Court
Woburn, Massachusetts

Telephone: 933-3329

Owner: Stephen Dagata, Sr., President

Principal Contact at Site: Mr. Anthony Dagata, the owner's son.

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1. Site Description:

Woburn Steel Drum, Inc. occupies a site of approximately 2.29 acres at 7 Harlow Court, just adjacent to the west side of the B & M railroad tracks and just southwest of the old Stauffer Chemical Company smokestack. The previous site owner was Stauffer Chemical Company, and Woburn Steel Drum, Inc. has operated here for about ten years. A corrugated steel/concrete block building occupies the northwest corner of the chain link fenced-in site. A platform/loading dock is on the east side of the building. On the platform/loading dock is an incinerator which is used for burning residues from the drums which are accepted by Woburn Steel Drum, Inc. for recycling. Numerous 55-gallon steel drums are stacked throughout the fenced-in yard. The majority of the open top drums are stacked on their sides and appear to be empty. It has not been ascertained whether any of the closed-top drums on site have any contents. In general, the drums are piled in a relatively orderly fashion and the security of the site appears adequate in that there is limited access to the property.

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2. Primary Site Activity:

On July 25, 1980, a telephone interview was conducted by Paul Clay of the E&E/FIT. The person interviewed was Tony Dagata, Vice President of Woburn Steel Drum, Inc. who stated that he was authorized to represent the company in his father's absence. Mr. Dagata was asked to describe the nature of the operations at the site. Mr. Dagata stated that the site operation involves receiving, cleaning and painting used drums from various sources. He stated that no full- or partially-full drums are accepted by Woburn Steel Drum, Inc. The two types of processes employed were described by Mr. Dagata as follows:

2.1 Open top drums:

These are put through the incinerator, sand blasted and painted, inside and out.

2.2 Closed top drums:

These are inspected for rust. If rusty, the tops are cut off and they are put through process number one. If not rusty, they are washed in a caustic soda solution, rinsed, steamed, dried and painted.

Mr. Dagata insisted that they do not accept drums with any amounts of material in them beyond small amounts of residue, and that this is burned off in the incinerator or rinsed in the caustic soda bath. Mr. Dagata stated that the caustic soda rinse is changed every four to five months and is discharged into an M.D.C. sewer line on the premises. The ash material from the incinerator is placed in a dumpster on the property and removed weekly by Ace Rubbish Removal to the Woburn landfill.

Mr. Dagata stated that he currently stores about ten 55-gallon drums of enamel paint and uses between two and three 55-gallon drums of paint per week. Mr. Dagata was unsure about the amount of caustic soda he had in stock.

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3. Background Information

Background information on Woburn Steel Drum, Inc. was obtained from several sources. The following is a summary of information obtained and reviewed by E & E:

- 3.1 Dun & Bradstreet Report, dated February 9, 1979, summarizing history and general operation of Woburn Steel Drum, Inc.; obtained by John Hackler, EPA Enforcement.
- 3.2 Massachusetts D.E.Q.E. Air Section Files were reviewed with Bob Cleary of Massachusetts D.E.Q.E. Woburn Steel Drum, Inc. has been cited many times over the past 15 years for air pollution violations related to their drum cleaning incinerator. In addition to these citations, there are numerous letters and notes, mostly discussing the incineration problem. Information relevant to our investigation is as follows:
 - 3.21 Notes dated January 30, 1980 by R. Gottberg, D.E.Q.E. "Some barrels contain residual chlorinated hydrocarbons".
 - 3.22 Citation for emissions dated November 8, 1979 by R. Slein.
 - 3.23 Notes dated September 9, 1979 by R. Tanzer, D.E.Q.E. - "Firm recycles barrels, has spray painting operation, lacquer based paint, use 1,000 gallons of paint per month".
 - 3.24 Letter dated October 23, 1979 from R. Slein to C. E. Bradley Laws in Brattleboro, Vermont.
RE: Purchase of paint by Woburn Steel Drum, Inc. looking for volatile organics content of paint and total purchase amount.

3. Background Information - continued

3.25 Notes dated September 2, 1977 by J. Dawling, D.E.Q.E. that material in used drums is drained into large container, then burned.

3.26 Liquid Organic Material Material storage form dated September 30, 1979 stating that 5,000 gallons of paint are stored in 55-gallon drums inside the Woburn Steel Drum, Inc. building and 110 gallons of "XZOL" are stored inside.

3.27 Notes dated June 30, 1980 by R. Stein, D.E.Q.E.
RE: Incinerator modification - S. Dagata of Woburn Steel Drum was asked how it is determined whether contaminants are present.
Dagata answers: "Lab analysis".

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3.3 Field Survey:

David Cook and Paul Clay, E&E/FIT, July 22, 1980. Observations and photographs were made of the Woburn Steel Drum, Inc. site from the B & M railroad tracks. Three manholes were noted:

- 3.31 One immediately inside the Woburn Steel Drum, Inc. (See Fig. 1) (The fence was deliberately constructed to include the manhole inside).
 - 3.32 The second manhole appeared to be cemented over and had the letters "MDC" in the cement.
 - 3.33 The third manhole was at the southern end of the site and appeared to be in line with a water-bearing culvert just south of the fenced-in area (See Fig. 2.).
- 3.4 Telephone Interview, July 25, 1980, between Tony Dagata of Woburn Steel Drum, Inc. and Paul Clay, E&E/FIT. In addition to other information cited from this conversation, Mr. Dagata stated that there are six manholes on the Woburn Steel Drum property. he stated that four are part of the City of Woburn sewer system and two are connected to the MDC sewer system. he stated that the MDC had cemented over one of their manholes on the property and that the MDC had asked them to adjust the pH of their discharge to 7.0.
- 3.5 Field Survey, July 25, 1980, Paul Clay and Lori Fucarile, E&E/FIT. Observations were made of the Woburn Steel Drum operation from the B & M railroad tracks. At one point, both Paul Clay and Lori Fucarile noted a strong acid-gas odor emanating from the Woburn Steel Drum, Inc. incinerator.
- 3.6 Telephone conversation with Steve Kruger, MDC Sewer Division, July 28, 1980. Mr. Kruger stated that Woburn Steel Drum, Inc. had been cited on April 3, 1978 for discharging material of high pH into the MDC sewer. The last communication MDC has on file was a second citation for the same reason, dated June 23, 1978. Mr. Kruger also stated that Woburn Steel Drum, Inc. does not possess an MDC permit to discharge into the MDC sewer at the present time.

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4. RECOMMENDATIONS:

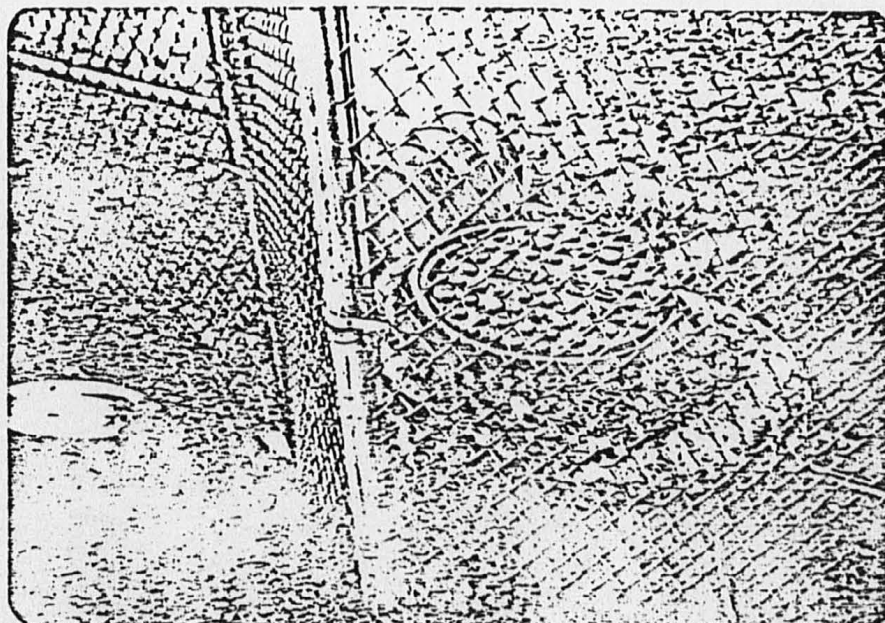
It is recommended that the E&E/FIT perform an on-site inspection of Woburn Steel Drum to determine the following:

- 4.1 The presence or absence of any stored quantities, outside or inside, of potentially hazardous material.
- 4.2 The exact location of all manholes within the property and a determination as to whether they have been used to dispose of unauthorized material.
- 4.3 The presence of any spilled material on the site which might be contaminating surface or groundwater.
- 4.4 The identity of the types of materials which are present as "residues" on the drums received by the facility.
- 4.5 The compliance of the drum incinerator with air quality regulations.
- 4.6 From the above determinations, the potential for RCRA and/or 311/104 Clean Water Act actions.

Location: WOBURN STEEL DRUM
WOBURN

Film Roll # 3
FIGURE 1.

Frame #: 11



Amplifying Information:

- A. Scene: VIEW OF MANHOLE INSIDE WOBURN STEEL DRUM
FENCE, WEST OF B&M RR TRACKS.
- B. Photo by: PAUL CLAY, EEL/FIT
- C. Date/Time: 7/22/80, 1610 HRS
- D. Sky Cond.: Hazy
- E. Camera/Lens: WERLISA/1:7.5, FIXED FOCUS
- F. Setting: SUN
- G. Type of Film: Fujichrome 100 ASA
- H. Witness(es): DAVID COOK, EEL/FIT

FIGURE 1

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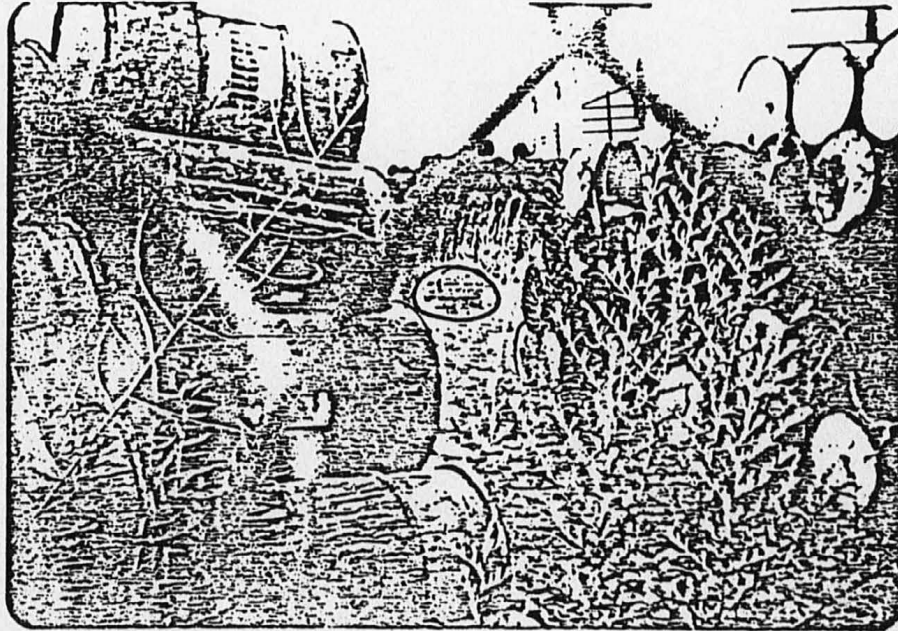
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Location: WOBURN STEEL DRUM

Film Roll # 3

Figure 2.

Frame #: 12



Amplifying Information:

- A. Scene: SOUTHERN END OF WOBURN STEEL DRUM YARD;
MANHOLE CIRCLED
- B. Photo by: PAUL CLAY, EET/FIT
- C. Date/Time: 7/22/80 1610KRS
- D. Sky Cond.: HAZY
- E. Camera/Lens: WERLISA/1:25 FIXED FOCUS 35mm
- F. Setting: SUN
- G. Type of Film: FUJICHROME 100 ASA
- H. Witness(es): DAVID COOK, EET/FIT

FIGURE 2

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POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION SITE NUMBER (to be assigned by HQ)

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME Woburn Steel Drum, Inc		B. STREET (or other identifier) 7 Harlow Court	
C. CITY Woburn	D. STATE MA	E. ZIP CODE 01801	F. COUNTY NAME Middlesex
G. OWNER/OPERATOR (if known) 1. NAME Stephan Dagata, Sr. - President		2. TELEPHONE NUMBER 933-3329	
H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN <i>CONCRETE block</i>			
I. SITE DESCRIPTION a corrugated steel building with a platform/loading dock on which is an incinerator used for burning residues from drums. Drums piled throughout yard in orderly fashion. Limited access			
J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.)		K. DATE IDENTIFIED (mo., day, & yr.)	
L. PRINCIPAL STATE CONTACT 1. NAME Robert Cleary, Mass DEQE, Woburn		2. TELEPHONE NUMBER 935-2160	

II. PRELIMINARY ASSESSMENT (complete this section last)

APPARENT SERIOUSNESS OF PROBLEM
 1. HIGH 2. MEDIUM 3. LOW 4. NONE 5. UNKNOWN

B. RECOMMENDATION
 1. NO ACTION NEEDED (no hazard) 2. IMMEDIATE SITE INSPECTION NEEDED
 a. TENTATIVELY SCHEDULED FOR: _____
 b. WILL BE PERFORMED BY: _____
 3. SITE INSPECTION NEEDED
 a. TENTATIVELY SCHEDULED FOR: _____
 b. WILL BE PERFORMED BY: _____
 4. SITE INSPECTION NEEDED (low priority)

C. PREPARER INFORMATION
 1. NAME: Paul Clay 2. TELEPHONE NUMBER: 617-935-4008 3. DATE (mo., day, & yr.): 7/30/80

III. SITE INFORMATION

A. SITE STATUS
 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.) 2. INACTIVE (Those sites which no longer receive wastes.) 3. OTHER (specify): _____
 (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?
 1. NO 2. YES (specify generator's four-digit SIC Code): _____

C. AREA OF SITE (in acres): 2.29 acres D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES:
 1. LATITUDE (deg.-min.-sec.): _____ 2. LONGITUDE (deg.-min.-sec.): _____

E. ARE THERE BUILDINGS ON THE SITE?
 1. NO 2. YES (specify): one corrugated steel & concrete block

T2070-2 (10-79)

recycled paper

Continue On Reverse
ecology and environment, inc.

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Continued From Front

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

A. TRANSPORTER		B. STORER		C. TREATER		D. DISPOSER	
<input checked="" type="checkbox"/> 1. RAIL		<input checked="" type="checkbox"/> 1. PILE		<input checked="" type="checkbox"/> 1. FILTRATION		<input checked="" type="checkbox"/> 1. LANDFILL	
<input type="checkbox"/> 2. SHIP		<input checked="" type="checkbox"/> 2. SURFACE IMPOUNDMENT		<input checked="" type="checkbox"/> 2. INCINERATION		<input type="checkbox"/> 2. LANDFARM	
<input type="checkbox"/> 3. BARGE		<input checked="" type="checkbox"/> 3. DRUMS		<input type="checkbox"/> 3. VOLUME REDUCTION		<input type="checkbox"/> 3. OPEN DUMP	
<input type="checkbox"/> 4. TRUCK		<input type="checkbox"/> 4. TANK, ABOVE GROUND		<input type="checkbox"/> 4. RECYCLING/RECOVERY		<input type="checkbox"/> 4. SURFACE IMPOUNDMENT	
<input type="checkbox"/> 5. PIPELINE		<input type="checkbox"/> 5. TANK, BELOW GROUND		<input type="checkbox"/> 5. CHEM./PHYS. TREATMENT		<input type="checkbox"/> 5. MIDNIGHT DUMPING	
<input type="checkbox"/> 6. OTHER (specify):		<input type="checkbox"/> 6. OTHER (specify):		<input type="checkbox"/> 6. BIOLOGICAL TREATMENT		<input type="checkbox"/> 6. INCINERATION	
				<input type="checkbox"/> 7. WASTE OIL REPROCESSING		<input type="checkbox"/> 7. UNDERGROUND INJECTION	
				<input type="checkbox"/> 8. SOLVENT RECOVERY		<input checked="" type="checkbox"/> 8. OTHER (specify):	ring water dumped in MDC sewer
				<input type="checkbox"/> 9. OTHER (specify):			

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

incinerator is used for burning residues from drums which are accepted by Woburn Steel Drum for recycling

V. WASTE RELATED INFORMATION

A. WASTE TYPE

1. UNKNOWN 2. LIQUID 3. SOLID 4. SLUDGE 5. GAS

B. WASTE CHARACTERISTICS

1. UNKNOWN 2. CORROSIVE 3. IGNITABLE 4. RADIOACTIVE 5. HIGHLY VOLATILE
 6. TOXIC 7. REACTIVE 8. INERT 9. FLAMMABLE

10. OTHER (specify):

WASTE CATEGORIES

Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Possible chlorinated hydrocarbons

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		<input checked="" type="checkbox"/> (3) OTHER (specify): LACQUER BASED PAINT	<input checked="" type="checkbox"/> (3) CAUSTICS	(3) MILLING/MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify):		

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V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

Possible Chlorinated Hydrocarbons

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.
 some barrels containing residual chlorinated hydrocarbons (see attached narrative) has spray painting operation, lacquer based paint, 1,000 gal. of paint per mo. 5,000 gal of paint and 110 gals. of "X20L" are stored inside building

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH	X			
3. NON-WORKER INJURY/EXPOSURE		X	7/25/80	During field survey P. Clay & Lori & Fucarile EEI/FIT detect possible acid
4. WORKER INJURY	X			
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER	X			
8. CONTAMINATION OF SURFACE WATER	X			
9. DAMAGE TO FLORA/FAUNA	X			
10. FISH KILL				
11. CONTAMINATION OF AIR	X			
12. NOTICEABLE ODORS		X	7/25/80	Numerous other complaints, Field survey P. Clay & L. Fucarile EEI/FIT detect acid-gas odor emanating from incinerator etc
13. CONTAMINATION OF SOIL	X			
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION	X			
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS	X			
17. SEWER, STORM DRAIN PROBLEMS		X	4/3/78 5/23/78	citation for discharging material of high pH into MDC sewer, possess no MDC permit
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING	X			
22. OTHER (specify):				

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VII. PERMIT INFORMATION

AND DATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- 1. NPDES PERMIT
- 2. SPCC PLAN
- 3. STATE PERMIT (specify):
- 4. AIR PERMITS
- 5. LOCAL PERMIT
- 6. RCRA TRANSPORTER
- 7. RCRA STORER
- 8. RCRA TREATER
- 9. RCRA DISPOSER
- 10. OTHER (specify):

B. IN COMPLIANCE?

- 1. YES
- 2. NO
- 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number):

VIII. PAST REGULATORY ACTIONS

- A. NONE
- B. YES (summarize below)

-citations 4/3/78 and 5/23/78 for discharging material of high pH into the MDC sewer
-citations by Mass. DEQE Air Section

IX. INSPECTION ACTIVITY (past or on-going)

- A. NONE
- B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

X. REMEDIAL ACTIVITY (past or on-going)

- A. NONE
- B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.