

No 000002B



91000



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

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September 12, 1986

Peter M. Page, Esquire  
Assistant Regional Counsel  
USEPA Region V  
Office of Regional Counsel  
230 South Dearborn  
Chicago, Illinois 60604

Re: In the Matter of: Fields Brook; Ashtabula County, Ohio

Dear Mr. Page:

Enclosed are the answers and supporting exhibits of The Cleveland Electric Illuminating Company to the Request for Information in the above-captioned matter.

If you have any questions, please contact either David W. Whitehead or myself.

Very truly yours,

David E. Burke  
Senior Corporate Counsel

DEB:ms

Enclosure

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY  
REGION V

In the Matter of: ) Request for Information Pursuant to Section  
) 104 of the Comprehensive Environmental Re-  
Fields Brook ) sponse, Compensation and Liability Act of  
Ashtabula County, ) 1980, 42 U.S.C. §9604, and Section 3007 of  
Ohio ) the Resource Conservation and Recovery Act,  
) 42 U.S.C. §6927.

REQUEST FOR INFORMATION

1. Please provide the date, State of incorporation, registered agent and his address for the addressed Corporation (hereinafter referred to as TAC).

ANSWER

Date - 1892

State of Incorporation - Ohio

Agent and Address for Purposes - David W. Whitehead, Esquire  
of this request

P. O. Box 5000, Room 704  
Cleveland, Ohio 44101  
(216) 622-9800, Ext. 2340

2. Provide the addresses of all facilities that have ever been owned or operated by TAC in the Fields Brook water basin in, or adjacent to, Ashtabula County, Ohio. If any of the facilities that have been operated by TAC were not at all times of operation owned by TAC, provide the name(s) of the other owner(s) of the facility and a description of each property's location.

ANSWER

Ashtabula "A" & "B" Plant  
2133 Lake Road  
Ashtabula, Ohio 44004

Ashtabula "C" Plant - Until Dec. 29, 1972, Ashtabula "C" Plant was owned and  
2715 Lake Road operated by Union Carbide Corporation  
Ashtabula, Ohio 44004

3. If any of the property owned by TAC in, or adjacent to, the Fields Brook water basin has been sold, leased or interests in said property otherwise conveyed by TAC to a third party or by a third party to TAC, state that party's name and the dates of any conveyance or sale.

ANSWER

Ashtabula "C" Plant was conveyed to the TAC by Union Carbide Corporation on December 29, 1972.

4. Provide a legal description of any TAC facilities or property located in, or adjacent to, the Fields Brook water basin in Ashtabula County, Ohio.

ANSWER

See attached documents.

5. Provide copies of any and all documents pertaining to the use and ownership of any TAC facility or property in, or adjacent to, the Fields Brook water basin in Ashtabula County, Ohio, including, but not limited to, deeds, contracts, leases, sub-leases, purchase agreements and related correspondence.

ANSWER

See documents produced in response to Request for Information No. 4.

6. Please provide the following information on each TAC facility that is within or may have discharged into the Fields Brook basin:

- a) the date of acquisition.
- b) the nature of the acquisition.
- c) the products produced at the facility before and after the acquisition.
- d) TAC position regarding its assumption of liability for actions arising out of operations at the plant by any previous owner/operator.
- e) all documents regarding the acquisition, including, but not limited to, contracts, deeds, leases, subleases, purchase agreements and correspondence.
- f) the plant's address.
- g) the date operations commenced.

ANSWER

Ashtabula "A" & "B" Plant

- a) March 22, 1929
- b) Fee Purchase
- c) Electricity
- d) Not Applicable
- e) See Response to Request No. 4
- f) See Response to Request for Information No. 2
- g) 1930

Ashtabula "C" Plant

- a) December 29, 1972
- b) Fee Purchase
- c) Electricity
- d) No Liability
- e) See Response to Request No. 4
- f) See Response to Request for Information No. 2
- g) 1972 as to CEI

7. Provide a list of all present and former plant managers, production managers and plant engineers at any of the above-described facilities. Please state the dates of their employment with the TAC, positions held and last known address. Also, please indicate the numbered Requests regarding which they may have information.

ANSWER

Alexander J. Kennedy (Retired)  
Employed: 1952  
Ashtabula Plant Manager 1961-85

Joseph C. Vendel  
Employed: 1959  
Ashtabula Plant Manager 1985 to Present

Mr. Vendel or Mr. Kennedy may be contacted through David W. Whitehead, Esq., at the address and telephone number listed in Request No. 1.

Mr. Vendel supplied information to Request Nos. 6, 7, 9, 11, 12, 13, 14, 15, 16, 17, 18, 26, 27, 28, 29, 30, 31, 35, 36 and 38.

8. Provide the names of any predecessor or successor corporations or partnerships which owned or operated any TAC facility, as described above, in Ashtabula County, Ohio.

ANSWER

Union Carbide Corporation, formerly Union Carbide and Carbon Corporation, was the owner and operator of Ashtabula "C" Plant prior to December 29, 1972.

9. Provide all knowledge or information you may have regarding contamination from your plant(s) entering Fields Brook, or a tributary thereof, either directly or indirectly.

ANSWER

TAC has no knowledge or information regarding contamination from its plants entering Fields Brook, or a tributary thereof, either directly or indirectly.

10. Provide all knowledge or information you may have regarding any property owned by you in Ashtabula County, Ohio, which may have been contaminated by prior owners or users. Your response should include, but not necessarily be limited to:
- a) names of prior owners or users.
  - b) use of facility and property by prior owners or users.
  - c) disposal practices of prior owners or users.
  - d) volume and nature of sources of such contamination.

ANSWER

TAC has no knowledge or information regarding property within or adjacent to the Fields Brook Watershed contaminated by prior owners or users.

TAC objects to the request for information for any property owned by TAC in Ashtabula County as being outside the scope of the proceeding as defined in the last sentence of paragraph one, page one of this Request for Information.

11. Provide all information you may have regarding any other sources of contamination to Fields Brook.

ANSWER

Run-off from the south side of the coal pile has found its way to the Detrex Tributary which runs into Fields Brook. Since 1978, a cement drainage culvert has been installed to divert the run-off into a storage basin. During periods of heavy rain, greater than the ten (10) year rainfall, the culvert will overflow allowing run-off to reach Fields Brook one half mile away.

Surface drainage from two ash disposal sites adjacent to Fields Brook.

12. Provide the following information regarding any sewer lines (including storm, sanitary or combined sewers) or french drains which receive or have received run-off or discharges from any TAC property which may discharge into the Fields Brook, or into the Fields Brook drainage basin:
  - a) The location and nature of each sewer line.
  - b) Whether each sewer line is connected to the main trunk line.
  - c) Does any sewer line have direct or indirect access to Fields Brook or a tributary thereof?

ANSWER

TAC has no information of any sewer lines or french drains from its property into Fields Brook or its drainage basin.

13. Provide the following information regarding any drainage ditches which receive or have received run-off or discharges from any TAC property and which are within, pass through, or may discharge into the Fields Brook drainage basin:
  - a) The location of each drainage ditch.
  - b) Whether run-off or discharge from each drainage ditch has direct or indirect access to Fields Brook or a tributary thereof.
  - c) Any information regarding the presence, or potential for releases, of hazardous substances or constituents in the ditches.

ANSWER

There are two (2) drainage ditches which receive run-off from TAC property:

- a) One drainage ditch is located on the south side of the coal pile drainage culvert. The second drainage ditch is located one half mile south of the coal pile under the EHV towers.

- b) Coal pile drainage had indirect discharge into Fields Brook. Drainage from the EHV right-of-way goes directly into Fields Brook.
- c) TAC does not believe that this drainage constitutes a release of hazardous substances based on Superfund reportable quantities. Coal pile drainage is acidic and contains trace amounts of ferrous sulfate and metals.

14. Does TAC have, or did TAC ever have, an NPDES permit for discharges to Fields Brook or a tributary thereto? Please identify any such permits.

ANSWER

No.

15. Describe each manufacturing process that has been operated at all plants owned or operated by TAC at its Ashtabula County, Ohio, facilities. For each facility and process provide the years that the operations occurred and all the raw materials associated with or relating to the process.

ANSWER

The generation of electricity.

Ashtabula "A" & "B" Plant  
1930 to Present  
Raw Material - Coal

Ashtabula "C" Plant  
1972 to Present  
Raw Material - Coal

16. Describe any hazardous substances that may have been contained in any by-product or wastes from each of the manufacturing processes described in Request 16. Also, describe the amounts of waste, by-products or hazardous substances generated by each of such processes on a yearly basis.

ANSWER

Coal combustion by-products, such as fly ash, bottom ash and pyrites, contain trace quantities of metals. Coal pile run-off is acidic in nature and would also contain metals and ferrous sulfate in trace amounts. TAC generated approximately 193,000 tons of ash in 1985.

17. Describe the storage, treatment and disposal practices for any by-product or wastes associated with each of the manufacturing processes described in response to Request 16. This description should identify any use of drums, tanks, lagoons, ponds, waste piles, ditches, marshes, swamps, land treatment or disposal areas, public sewers, landfills, creeks, or waterways used or affected by such practices.

ANSWER

TAC does not generate any wastes or by-products that end up in the Fields Brook drainage basin. All waste treatment facilities lie outside the Fields Brook drainage basin.

18. Describe the nature and state of any records and recordkeeping practices that have ever been maintained relating to any storage, treatment or disposal practices for any by-products or wastes associated with each manufacturing process described in response to Request 16.

ANSWER

Quarterly fly ash reports are maintained detailing the amount of ash produced/ disposed. Monthly NPDES reports are submitted to OEPA.

19. Describe each chemical reclamation process that TAC has operated at its Ashtabula County, Ohio, facilities. For each facility and process state the years during which operation of the process occurred, the type of process equipment used, the types of chemicals associated with each reclamation process, the volume processed annually by each process, and the sources of the chemicals.

ANSWER

Not applicable.

20. Describe the nature and state of any records and recordkeeping practices that have ever been maintained relating to the volume and kinds of chemicals received and processed as described in response to Request 20.

ANSWER

Not applicable.

21. Describe the characteristics and the nature of wastes or by-products associated with each reclamation process. Such description should include any characteristic or listing that such waste would likely have under 40 CFR Part 261. The description should also include any hazardous substances the waste would likely contain.

ANSWER

Not applicable.

22. Describe the nature and state of any records and recordkeeping practices that have ever been maintained relating to the characteristics and nature of the wastes or by-products described in response to Request 22.

ANSWER

Not applicable.

23. Describe the practices and conditions relating to the storage of hazardous wastes or hazardous substances upon their arrival at each of TAC's Ashtabula County, Ohio, facilities, until the time of their reclamation. Such a description should include, along with any dates when any significant changes occurred:
- a) what types of wastes were/are stored in drums.
  - b) what types of wastes were/are stored in tanks.
  - c) what types of containment systems for spills or releases were provided at the storage areas.
  - d) the location of any storage areas.
  - e) whether drums have been marked with the generator's or transporter's name.
  - f) whether hazardous wastes from more than one source were ever mixed or comin-gled in a tank. How common was this practice? Did this include emptying drums into tanks?
  - g) what was the practice regarding the cleanup of spilled materials from these stored hazardous wastes?
  - h) did spills or releases (including those caused by fire) of these materials ever occur while they were awaiting processing?
  - i) whether such wastes were ever stored in lagoons or ponds.
  - j) what types of such wastes were stored in lagoons or ponds.
  - k) what type of liner or any other impervious barrier did lagoons or ponds have to prevent the release of materials.
  - l) what types of wastes, if any, were ever stored in waste piles.
  - m) what records and recordkeeping practices have ever been maintained on storage and what is the state of those records?

ANSWER

Not applicable.

24. Describe TAC's practices relating to the disposal and treatment of still bottoms, sludges and other non-reclaimed materials accumulated in any reclamation process itself. Please include in such a description, along with the dates for different practices:



- a) whether the non-reclaimed materials were drummed up for disposal.
- b) if such non-reclaimed materials were drummed up, whether they were normally (or necessarily) put back in the drums of the seller from whom they originated.
- c) whether the non-reclaimed material was allowed to accumulate and was stored prior to treatment or disposal.
- d) the locations and types of storage areas used for storage of the non-reclaimed materials. Examples of types of storage areas could include drums, tanks, pits, waste piles, ponds or lagoons.
- e) any containment systems utilized at these storage areas to help prevent releases of the stored material to the environment.
- f) whether any spills or releases of these stored materials ever occurred. Approximately when.
- g) where and how such materials were disposed.
- h) what records and recordkeeping practices have ever been maintained in regard to the above practices. What is the state of those records?

ANSWER

Not applicable.

25. Describe practices relating to any incineration processes used for disposal of wastes from each of TAC's Ashtabula County, Ohio, facilities. This description should include:
- a) the location and years during which each incinerator operated.
  - b) the rates capacity for each incinerator.
  - c) the normal operating and peak temperature for each incinerator.
  - d) the rated retention time for materials during the burn.
  - e) the type of fuel used to bring the incinerator up to operating capacity.
  - f) how the material was fed to the incinerator.
  - g) what types of operating records were kept, including temperature and feed rate.
  - h) the types of air pollution control devices that were installed on each incinerator and stack test results.
  - i) whether any misting or raining from the incinerator stacks ever occurred.
  - j) what quantities of incinerator ashes or sludges were generated from the incineration processes.
  - k) what types of materials and volumes were burned in these incinerators.
  - l) were any PCBs known to have been burned in these incinerators.

- m) did the materials that were burned include non-reclaimable materials from stills.
- n) were materials from stills accumulated and stored prior to incineration.
- o) did the materials sent to TAC include materials sent there solely for purposes of incineration.
- p) were materials sent to TAC for incineration on occasion otherwise disposed. How and why?
- q) how and where were by-products of the incineration process (including ash bottoms, fly ash, sludges and scrubber water) disposed.
- r) any records and recordkeeping practices that have ever been maintained relating to the described practices. What is the state of those records?

ANSWER

Not applicable.

26. Has TAC ever disposed or arranged for the disposal of any materials in the Reserve Environmental Services, Inc. landfill? If so, please state:
- a) when the disposal occurred.
  - b) the nature of the solid and liquid wastes.
  - c) whether the wastes contained hazardous substances.
  - d) the amount of wastes involved.
  - e) if known, where at Reserve's landfill the wastes were disposed.
  - f) describe all terms of any arrangement for the disposal of these materials.
  - g) what records, if any, have ever been maintained documenting such disposal and arrangements for disposal.

ANSWER

Yes.

- a) Between 1979 and 1980
- b) fly ash and fill dirt
- c) No
- d) Not applicable
- e) Unknown
- f) No information available
- g) Unknown

27. Has TAC ever observed any leachate escaping or being released from any TAC storage or disposal areas on property owned or operated by TAC? If so, describe the location and physical characteristics of the leachate such as color, odor or viscousness. When and by whom has this been observed?

ANSWER

See answers to Requests No. 11 and 13. The leachate is typically odorless, clear and has a slight greenish color that turns red upon aeration.

28. Do you have any information indicating that leachate from the TAC storage or disposal areas on property owned or operated by TAC in Ashtabula County, Ohio, may have escaped or been released into surrounding ditches, Fields Brook or a tributary thereof? If so, please state it, and include when such occurrences took place and who observed them.

ANSWER

Yes. An OEPA letter dated July 22, 1980 states that the coal pile run-off is contributing to the low pH and heavy metal problems in a tributary that flows into Fields Brook.

29. Have soil samples been collected and analyzed or monitoring wells ever been installed in or adjacent to the property to monitor for releases of pollutants or hazardous waste constituents? If so, please provide any data you have from such monitoring activities.

ANSWER

No.

30. Describe any location on TAC property located in the Fields Brook water basin at which wastes from TAC operations have been disposed. Please state the approximate time of disposal, the types of materials, their chemical characteristics and volumes involved. Also, provide any information you have regarding sample analyses that have been conducted of material in or adjacent to any other locations on TAC property in the Fields Brook water basin at which wastes from G & W operations have been disposed.

ANSWER

East of the coal pile under the EHV tower lines. Fly ash, bottom ash and pyrites were used as fill to make a roadway. This occurred between 1964 and 1970. The volume is unknown.

South of the coal pile, fly ash, bottom ash and pyrites were used as fill in low areas. This occurred prior to 1970. The volume is unknown.

31. Describe the location and size of each lagoon, pond, waste pile, trench or pit that has existed on the TAC property and its purpose. For each lagoon, pond, waste pile, trench or pit describe:

- a) Any hazardous substances that may be or have been contained in them.
- b) The dates of each structure's existence and use.
- c) Any construction properties of each pit, pond, waste pile, trench or lagoon which would help prevent the release of materials from it.
- d) If not in use now, explain how it was closed or has been modified and the present use of the area.
- e) Any pictures, sketches or maps of these facilities.

ANSWER

Prior to 1978, a small ash pond (less than one (1) acre) existed adjacent to Lake Erie, north of Lake Road. This pond received only coal combustion by-products and no hazardous substances. This pond is now part of the TAC's NPDES treatment system. No hazardous substances are treated by these systems.

In 1979, TAC constructed a limestone lined coal pile run-off pond adjacent to its coal pile. Coal pile run-off is acidic and contains trace quantities of metals. This pond is still in use.

32. Provide the name of each customer from whom TAC has received hazardous substances for purposes of treatment or disposal, including incineration or reclamation. Further, provide any information you have on the kind of waste received, the quantity of each kind of waste received, the processes used by TAC in handling these wastes, the period during which each kind of waste was received and processed and the likely disposition of any residues from that process.

ANSWER

Not applicable.

33. Provide copies of any documents that you now have that contain information indicating the receipt of hazardous wastes for reclamation, incineration, or other treatment by TAC. Such documents would include logs, invoices, bills of lading, purchase orders, work orders, trucking records, correspondence, contracts or other agreements.

ANSWER

Not applicable.

34. Provide the names of all other off-site facilities that have been used by TAC for the disposal of unreclaimed chemical wastes and hazardous wastes, incineration process wastes and manufacturing process wastes. Provide the dates during which such disposal has occurred and the kinds of wastes sent to each facility.

ANSWER

TAC does not dispose of any unreclaimed chemical wastes and hazardous wastes etc., in the Fields Brook Watershed.

TAC objects to the Request for Information outside of the Fields Brook Watershed for the reason stated in Request No. 10.

35. Provide any information you have regarding the waste disposal methods utilized by any surrounding property owners or users.

ANSWER

TAC has no information.

36. Describe any information TAC may have obtained regarding contaminated fill material or debris deposited in or near Fields Brook or its tributaries. Such should include any information regarding fill allegedly disposed by Brenkus Excavating at or near the residence of [REDACTED] [REDACTED] or any other location within or which may impact the Fields Brook drainage basin.

ANSWER

TAC has no information.

37. A list and description of all liability insurance coverage that is or was carried by you or any predecessor or successor corporations or partnerships, including any self-insurance provisions, that relates to hazardous substances and/or the above-referenced sites. Provide copies of all of these insurance policies.

ANSWER

TAC is self-insured. However, TAC has not disposed of hazardous substances at the above-referenced sites.

38. Provide any information that you have concerning the disposal of hazardous substances from operations at Reserve Environmental Services, Inc. including:
- a) description of the method of operations at the site (e.g. how drums were rinsed, materials used in drum cleaning, methods of disposal of waste residues from drums, disposal of rinse water, etc.)
  - b) the disposal locations used by Reserve Environmental Services for residues, rinse water and solid wastes generated by their operations. This description should include locations both on and off their properties.
  - c) the disposal locations for any drums discharged by the company.
  - d) the estimated quantity of drums and waste residue disposed of at each location by the company.

e) whether the company received drums from persons other than TAC for cleaning.

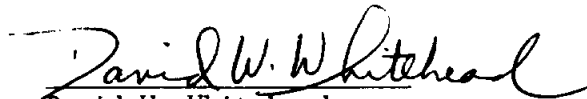
ANSWER

TAC has no information.


STATE OF OHIO            )  
                                  ) SS:  
COUNTY OF CUYAHOGA )

VERIFICATION

I, David W. Whitehead, Senior Corporate Counsel of The Cleveland Electric Illuminating Company, have read the answers to interrogatories set forth in the "USEPA Request for Information to The Cleveland Electric Illuminating Company," and state that these answers are true and correct to the best of my knowledge and belief.

  
David W. Whitehead

SWORN TO BEFORE ME and subscribed in my presence this 12 day of September, 1986.

  
Notary Public  
My commission does not  
expire.