



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

In the Matter of:) Amended response of Olin Corporation
) to the May 16, 1986 U.S. EPA Request
FIELDS BROOK) for Information Pursuant to
) Section 104 of the Comprehensive
ASHLAND COUNTY, OHIO) Environmental Response,
) Compensation and Liability Action
) of 1980, 42 U.S.C. Section 9604, and
) Section 3007 of the Resource
) Conservation and Recovery Action,
) 42 U.S.C. Section 6927.

INTRODUCTORY STATEMENT

Olin Corporation ("Olin") submits this amended response to the May 16, 1986 U.S. EPA Request for Information concerning Fields Brook.

Olin affirmatively objects to this request, to the extent it is inconsistent with the Paperwork Reduction Act of 1980. In addition, Olin objects to certain specific questions to the extent they seek information not related to solid or hazardous wastes or hazardous substances, outside the scope of EPA's information gathering authority under 42 U.S.C. Section 6927 and 9604. Without waiving these objections or its rights not to respond to this request, Olin voluntarily answers this request, as set forth hereinafter.

Some of the requests seek information which has previously been submitted to EPA and/or Ohio EPA. In order to avoid the unnecessary burden of submitting documents which EPA already has and thereby complicating the task of document review and maintenance, Olin is describing some documents but not producing them herewith. If EPA no longer has these documents, Olin will provide the agency with copies of such documents or an opportunity to copy them at EPA's request.

In addition to the specific objections supra, Olin also objects to certain of the instructions. Olin objects to the instruction requiring it to provide estimates and its method of estimation where specific responsive information is not available or accessible. Olin further objects to instructions requiring it to respond based on information in possession or control of third persons, including retained counsel. In addition, Olin specifically objects to the instructions to the extent that they seek the disclosure of communications protected by the attorney-client privilege. Olin also objects to the instructions calling for continuing or correcting responses based on information acquired after the submission of its response. By letter of even date herewith, Olin is seeking a limited extension of time to complete its search for relevant information, and finalize its response.

RESPONSES TO REQUESTS FOR INFORMATION

1. Please provide the date, State of incorporation, Registered Agent and his address for Olin Chemicals Corp., (hereinafter referred to as OCC).

Olin Corporation was incorporated in the Commonwealth of Virginia in 1892, and its registered agent is CT Corporation, 1633 Broadway, New York, NY 10019.

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

Olin Corporation operated a chemical facility at Middle Road, Ashtabula Township, Ashtabula, OH 44004. Initially, Olin and General Tire and Rubber Company were the co-operators of the facility. The owner of the property was General Tire and Rubber Company (Gen Corp.), One General Street, Akron, OH 44329.

Answer to Request No. 4 provides a description of the property leased by Olin Corporation from General Tire and Rubber Company.

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

Not Applicable

4. Provide a legal description of any Olin Chemicals Corporation facility or property located in the Fields Brook Water basin in Ashtabula County, Ohio.

Being known as part of Lot 6, Erie Tract in the Township of Ashtabula, County of Ashtabula, State of Ohio and being more generally described as follows:

Beginning at a point in a chain link fence known as station 752.258. - 450.0E., General Tire survey as shown on a drawing titled Map of Lands - North Side Middle Road, revised November, 1963; thence running N. 0° 08' 30" E. along said fence about 120' Ft. to a fence post; thence running S. 89° 51' 30" E. along said fence about 140' Ft. to a fence post; thence running N. 0° 08' 30" E. along said fence about 205' Ft. to a fence post; thence running S. 89° 51' 30" E. along said fence about 305' Ft. to a point in the Westerly line of land now owned by the Cleveland Electric Ill. Co.; thence running S. 18° 19' 20" E. along said westerly line the Cleveland Electric Ill. Co., about 566' Ft. to a stone mon.; thence running S. 0° 09' E. along said westerly

7480e

line of the Cleveland Electric Ill. Col, 436.2' Ft. to a stone monument in a northerly line of land now owned by Cabot Titania Corp.; thence running S. 87° 21' W. along said northerly line of Cabot Titania Corp. 354.5' Ft. to a stone monument; thence running S. 0° 22' 45" W. along the westerly line of said Cabot Titania Corp. about 185' Ft. to the Southerly low bank of a small stream known as Fields Brook; thence running westerly along said southerly low bank of Fields Brook 410' Ft. to the easterly said of a bridge crossing over said Fields Brook; thence running northerly along said easterly line of said bridge and the easterly pavement edge of an existing 24' Ft. asphalt pavement roadway as shown on about indicated drawing about 810' Ft. to a chain link fence near the northwest corner of a metal guard bldg.; thence running easterly along said fence about 16' Ft. to a fence post; thence running N. 0° 08' 30" E. along said fence about 120' Ft. to a fence post; thence running S. 89° 51' 30" E. along said fence about 14' Ft. to a fence post; thence running N. 0° 08' 30" E. along said fence about 100' Ft. to the place of beginning, shown on Exhibit "A" attached hereto and made a part hereof, as Item No. 13, and colored in pink.

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

Olin objects to this question which relates to matters outside of the scope at 42 U.S.C. Section 6927 and 9604 and which is overly broad and unreasonably burdensome. Notwithstanding this objection, and without waiving it herewith, copies of principal documents pertaining to the ownership of the Ashtabula facility are attached.


6. 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 OCC, position held and last known address. Also, please indicate the numbered Requests regarding which they may have information.

Plant Managers

<u>Name</u>	<u>Approximate Dates</u>	<u>Last Known Address</u>
Joseph H. Bianco	10/1/63 - 10/31/64	Deceased
George P. Palmer	11/64 - 11/66 11/1/71 - 9/72	[REDACTED]
Richard W. Papenfuss	11/1/66 - 8/1/69	[REDACTED]
Steven Cupach	2/70 - 12/71	[REDACTED]
George Latta Acting Manager Manager	9/1/72 10/1/73 - 9/1/74	Olin Corporation Olin Road McIntosh, AL 36553
Larry D. Hinson	11/1/74 - 10/8/76	P.O. Box 58113 Houston, TX 77058
James Langford	10/76 - 6/78	Unknown
William McGlasson	3/78 - 11/81	Olin Corporation Olin Road McIntosh, AL 36553

<u>Name</u>	<u>Approximate Dates</u>	<u>Last Known Address</u>
Curt Richards Acting Plant Mgr.	7/80 - 12/81	Olin Corporation I-10 West Lake Charles, LA 70602
Bruce Jacobsen Acting Plant Mgr.	10/81 - 12/82	N. Kingsville Ohio Office 6551 S. Main N. Kingsville, OH 44068

Production Managers

Neal Haineline	1968 - 1970	No Record in Personnel
Dorsey Ayers	1970 - 1972	No Record in Personnel
Steven Cupach	1/66 - 2/70	
Arnold L. Matson	10/1/74 - 10/81	Olin Corporation 95 Mac Corkle Ave. S. Charleston, WV 25383

Plant Engineers

<u>Name</u>	<u>Approximate Dates</u>	<u>Last Known Address</u>
George Latta	1/1/64 - 9/1/70	Olin Corporation Olin Road McIntosh, AL 36553
Richard A. Brendler	6/70 - 11/81	Olin Corporation 95 Mac Corkle Ave. S. Charleston, WV 25383
Jim Tindall	6/20/77 - 5/1/81	Olin Corporation Lower River Road Charleston, TN 37310
Gary Wright	1/79 - 11/81	Olin Corporation 95 Moc Corkle Avenue S. Charleston, WV 25383
Cary Franklin	3/1/79 - 7/6/79	Olin Corporation I-10 West Lake Charles, LA 70602

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

None

8. On what date did OCC commence operations of its Middle Road facility at or near Ashtabula, Ohio?

The exact date when Olin Corporation commenced operation of its Middle Road facility is currently unknown but is believed to have occurred sometime in late 1963 or early 1964.

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

Virtually all contamination entering Fields Brook from Olin's plant were permitted discharges from the plant's wastewater collection and treatment system. Information describing these discharges during the plant's operation was routinely filed with and obtained by EPA, Ohio EPA and their respective predecessor agencies. This information is set forth in numerous permits, permit applications, self-monitoring reports and compliance inspection reports. Because this information should be contained in EPA's own files, Olin is preparing and will submit a general list of these documents. Upon request Olin will

provide copies of any documents that EPA does not have or have access to or will provide EPA with an opportunity to copy such documents.

In addition, Olin will review its relevant files and provide EPA with a copy of documents which describe any non-routine discharges, including spills entering Fields Brook, which are not identified in the listed documents.

Olin objects specifically to the request to the extent that it requires additional information and documents pertaining to routine wastewater discharges because of the difficulty in locating and producing all such information.

Between December, 1978 and September, 1983 Olin conducted a groundwater monitoring program at the plant site. Sampling data through 12/14/82 and estimates of the potential for contaminants to enter Fields Brook via groundwater were reported previously to USEPA Region V in the July 13, 1983 report to Mrs. Elizabeth Utley. Data from samples subsequently taken on 7/26/83 and 9/14/83 are attached. The 1983 sample results show a continued low level of groundwater contamination and confirm that groundwater migration from Olin's former plant site has no significant environmental impact on Fields Brook.

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.

Not applicable as Olin did not own any such property. Olin has not located any information regarding contamination of its former plant site by others.

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

Olin objects to this question as being overly broad, unreasonably burdensome and calling for speculation on Olin's part. See also answer to No. 36.

12. Provide the following information regarding any sewer lines (including storm, sanitary or combined sewers) or french drains which receive or have received runoff or discharges from the property located near Middle Road in Ashtabula, Ohio.

- 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 thereto?

The plant had internal process wastewater, stormwater and sanitary sewer systems. All these systems discharged initially through two permitted outfalls and later through a combined single permitted outfall to Fields Brook. The attached schematic shows the plant sewer systems in 1972.

13. Provide the following information regarding any drainage ditches which receive or have received runoff or discharges from the property located near Middle Road in Ashtabula, Ohio:

- a) The location of each drainage ditch.
- b) Whether the runoff or discharge from each drainage ditch has direct or indirect access to Fields Brook or a tributary thereto.
- c) Any information regarding the presence, or potential for releases, of hazardous substances or constituents in the ditches.

See response to No. 12

During plant demolition and closure a filled in drainage ditch was discovered along the eastern edge of the plant area. We have

7480e

not been able to determine what the function of this ditch was or whether runoff from the ditch formerly entered Fields Brook. Contaminated sediments in this ditch were removed as part of plant closure.

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

Olin Corporation had an NPDES Permit. The numbers are Ohio EPA F314; USEPA OH 0001376 initially issued 3/8/74 to be effective 4/8/74. The plant also had an Ohio Department of Health industrial discharge permit initially issued 7/16/64.

15. Describe each manufacturing process that OCC has operated at any of its Ashtabula County, Ohio, facilities, including the facility on Middle Road. For each facility and process provide the years that the operations occurred and all the raw materials associated with or relating to the process.

From 1964 until 1981 Olin operated a toluene diisocyanate manufacturing plant which produced hydrochloric acid and orthotoluene diamine as coproducts. Raw materials used were coke, oxygen, chlorine, carbon monoxide, carbon dioxide and toluene diamine. Monochlorobenzene was used as a solvent in the process.

Coke was burned with oxygen and carbon dioxide to form carbon monoxide. Carbon monoxide and chlorine were used to produce carbonyl chloride (phosgene). Carbonyl chloride and toluene diamine were used to make toluene diisocyanate. Benzoyl chloride and butylated hydroxy toluene (BHT), chemical name 2, 6-di-tert-butyl-para-cresol, were added to the finished toluene diisocyanate.

16. Describe any hazardous substances that may have been contained in any by-products or wastes from each of the manufacturing processes described in Request 15. Also describe the amounts of wastes, by-products or hazardous substances generated by each of such processes on a yearly basis.

The major by-products from the process are hydrochloric acid and orthotoluene diamine. The major waste is TDI residue. These materials are hazardous substances.

Hydrogen sulfide from the water scrubber at the carbon monoxide plant was discharged in the plant effluent in the early years of operation. The source of the sulfur was the coke. In later years, a different source of coke with a reduced sulfur content was used in the carbon monoxide plant.

Carbon tetrachloride was generated as a waste from the purification of toluene diamine. Sulfuric acid wastes were generated from cleaning the pollution control equipment. Dichlorobenzenes were impurities in the monochlorobenzene solvent. Attached is a copy of a draft response to a USEPA questionnaire on TDI manufacture which describes the waste streams from Olin's plant.

A further response is being prepared.

17. Describe the storage, treatment and disposal practices for any by-products or wastes associated with each of the manufacturing processes described in response to Request 15. 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.

A response is being prepared.

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 15.

The following records are known to have been maintained.

- (1) Accounting and shipping records on the sale of by-products and disposal of waste;
- (2) RCRA inspection reports and manifests;
- (3) Miscellaneous memos and reports.

Shipping records were initially maintained at the Ashtabula plant; copies of some shipping records were initially maintained at Olin's headquarters in Stamford, CT. Accounting records were initially maintained at the Ashtabula plant and at Olin's headquarters. Most accounting and shipping records have been destroyed pursuant to routine corporate record retention practices. The remaining documents are now located at corporate headquarters or its nearby record retention facility.

Documents in categories (2) and (3) were initially maintained at the Ashtabula plant; copies of some such records were initially maintained in Stamford, CT. Some of these documents have been destroyed pursuant to routine corporate record retention practices. The remaining documents are now located at corporate headquarters or in its record retention facility.

19. Describe each chemical reclamation process that OCC 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.

No reclamation of chemicals from outside sources occurred at the plant site. By design, the manufacturing process included recycling of various chemical streams.

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 19.

Not applicable.

21. Describe the characteristics and the nature of wastes or by-products associated with each reclamation process. Such description should include any characteristics 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.

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 21.

Not applicable.

23. Describe the practices and conditions relating to the storage of hazardous wastes or hazardous substances upon their arrival at each of OCC'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 drum.
- b. What types of wastes were/are stored in tanks.
- c. What type of containment system for spills or releases was provided at the storage areas.
- d. The location of any storage areas.
- e. Whether drums have been marked with generator's or transporter's name.
- f. Whether hazardous wastes from more than one source were ever mixed or commingled 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 types of liners or any other impervious barriers 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.

Not applicable.

24. Describe OCC'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 system utilized at these storage areas to help prevent releases of these stored materials.
- 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 record?

Not Applicable

25. Describe practices relating to any incineration process used for disposal of wastes or materials from each of OCC's Ashtabula County, Ohio facilities. This description should include:

- a. The location and years during which each incinerator operated.
- b. The rated capacity for each incinerator.
- c. The normal operating and peak temperature for each incinerator.
- d. The rated retention time for material 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 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 OCC include materials sent there solely for purposes of incineration.
- p. Were materials sent to OCC 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?

No incineration of wastes took place on site.

In 1967 a trial incineration of approximately 500 gallons of waste liquids took place at Diamond Alkali Company in Ashtabula.

Olin has not determined the nature of the waste liquids or if further incineration was conducted.

A 1972 Olin report states that impurities from raw toluene diamine distillation were burned in a boiler with natural gas to produce steam. Presumably this means that ortho toluene diamine was being burned in the boilers of the neighboring General Tire plant which supplied steam to Olin.

When the phosgene plant was down and the carbon monoxide plant was in operation, carbon monoxide was burned in a flare. The flare was permitted by the OEPA.

26. Has OCC disposed or arranged for the disposal of any materials in the Reserve Environmental Services, Inc. disposal facility located in Ashtabula Country, Ohio? If so, please state:

- a. When the disposal occurred.
- b. The nature of the solid wastes.
- c. The nature of the liquid wastes.
- d. Whether the wastes contained hazardous substances.
- e. The amount of wastes involved.
- f. If known, where at the Reserve disposal facility the wastes were disposed.
- g. Describe all terms of any arrangement for the disposal of these materials.

- h. What records, if any, have ever been maintained documenting such disposal and arrangements for disposal.

Olin has arranged for the disposal of toluene diisocyanate residue and spent caustic scrubber solution at Reserve Environmental Services. However, Reserve Environmental Services operations are not located within the designated Fields Brook area but rather are located near La Bounty Road within the drainage basin of an unnamed river system which discharges directly to Lake Erie approximately one-half mile west of Kingsville On-the-Lake. Therefore, Olin's dealings with Reserve Environmental Services do not relate to the release or threatened release of hazardous substances into Fields Brook and are irrelevant to the subject matter of this request for information.

27. Has OCC ever observed any leachate escaping or being released from any disposal area on property owned or operated by OCC in Ashtabula County, Ohio? 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?

No.

28. Do you have any information indicating that leachate from any of the disposal areas on property owned or operated by OCC may have

escaped or been released into surrounding ditches, Fields Brook, or a tributary thereto? If so, please state it, and include when such occurrences took place and who observed them.

No.

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

Yes. For groundwater monitoring wells see the answer to Request No. 9. Data relating to 336 soil samples which were analyzed during plant closure were previously submitted to Mrs. Elizabeth Utley of USEPA Region V in a report dated 7/13/83. Data relating to soil and sludge samples taken during the closure of the North Lagoon were submitted to USEPA Region V in Olin's response to EPA request for information No. OHD-001813708. Soil analyses taken during the installation of the monitoring wells in 1978 are attached.

Also attached are an April 1, 1974 report to the Ohio EPA which includes the log for the test borings made prior to the construction of the plant, a February 2, 1976 soil sampling report and a 1980 report of soil borings at the new emergency spill basin by Herron Testing Laboratories, Inc.

30. Describe any location on OCC property located in the Fields Brook water basin at which waste from OCC 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 materials in or adjacent to any other location on the OCC property at which wastes from OCC operations have been disposed.

At the time of closure of the plant, an investigation of the site was made to determine if there had been disposal of chemical wastes in the past. A drainage ditch on the east side of the plant area was found to have been filled with contaminated materials. These materials, all toluene diisocyanate residue and a large volume of contaminated soil were removed at closure and sent offsite outside the Fields Brook area for disposal in permitted facilities. Olin is of the opinion that no waste remains.

31. Describe the location and size of each lagoon, pond, waste pile, trench or pit that has existed on the OCC Middle Road 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.

- 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.

Three lagoons known as the North Lagoons were located at the north of the plant area and were part of the plant wastewater treatment system. The east, center and west ponds located at the south end of the plant were also part of the plant wastewater treatment system. Toluene diisocyanate residue was reportedly stored at one time at the north end of the plant in a pile and later in a permitted hazardous waste area in a pile. A drainage ditch on the east side of the plant has been discussed in the answers to questions 13 and 30. Flyash from the carbon monoxide manufacturing process which was non-hazardous was stored in a pile near the residue aging sheds. At various times this general area was used to store sediments removed from the east, center and west wastewater treatment ponds.

Attached is a 9/28/79 report to the Ohio EPA which describes the north lagoons, the settling ponds and the solar ponds and a plant schematic which shows their locations. The new emergency spill basin was constructed in 1980. Other records indicate that one of the two oldest settling ponds was not constructed until 1966 and therefore would have been 13 years old in 1979.

The north lagoons were taken out of service prior to the effective date of RCRA in November, 1980 and replaced by the new emergency spill basin at the south end of the plant. The sludges in the north lagoons were removed and sent to a chemical landfill and the lagoons were filled and covered with a clay cap in 1981. The southeast and south/middle settling ponds were excavated and then filled during plant demolition in 1982. The excavated sediments were sent to a secure landfill. The south solar pond was replaced by the new concrete emergency spill basin in 1980. The east solar pond was destroyed during plant closure in 1982. The west settling pond was cleaned and turned over to General Tire for use in their waste water treatment system in 1982. The new emergency spill basin was closed in 1982 in accordance with the hazardous waste facility closure plan and turned over to General Tire for use in their waste water treatment system.

A response is being prepared in connection with a response to Request No. 17.

32. Provide any information that you have concerning the disposal of hazardous substances from OCC 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.)

7480e

- b. The disposal locations used by Reserve Environmental Services, Inc. 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 discarded 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 for cleaning from parties other than OCC.

See response to Request No. 26.

33. Provide the name of each customer from whom OCC has received hazardous substances for purposes of treatment or disposal, including incineration or reclamation. Further, provide any information you have on the kinds of wastes received, the quantity of each kind of waste received, the processes used by OCC 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.

Not applicable.

34. 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 OCC. Such documents would include logs, invoices, bills of lading, purchase orders, work orders, trucking records, correspondence, contracts or other agreements.

Not applicable.

35. Provide the names of all other off-site facilities that have been used by OCC 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.

Except as described in the response to Requests 25 and 36, all off-site disposal facilities which received such wastes from the plant are located outside the Fields Brook watershed and thus are irrelevant to the subject matter of this request for information.

36. Describe any information OCC 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]

A response to this request is being prepared.

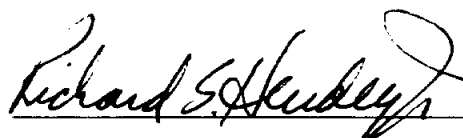
37. A list and description of all liability insurance coverage that is or was carried by you or any predecessor or successor corporations or partnerships, including any self-insurance provisions, that relates to hazardous substances and/or the above reference sites. Provide copies of all of these insurance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

A confidential list of the names of companies with whom Olin has liability insurance coverage is enclosed. Olin objects to providing copies of such policies because it is unnecessarily burdensome and outside of the scope of 42 USC Section 6927 and 9604.

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

Olin objects to this question as being unnecessarily broad, unduly burdensome and unreasonable. EPA already has or is directly obtaining from summoned property owners extensive information about such methods. Notwithstanding this objection, and without waiving it, Olin in searching its records for responses to other Requests herein has found two additional documents, which may not have been furnished to EPA or be otherwise publicly available. A 12/31/68 internal Olin report notes that CEI had a large cinder pile on the north side of

Fields Brook east of Olin's plant. A slurry of this material in distilled water had a ph of 4.2. Attached is a 7/8/71 General Tire report on toxins used in their plant which was found in Olin's files.

A handwritten signature in cursive script, reading "Richard S. Hendey, Jr.", written over a horizontal line.

Richard S. Hendey, Jr.

Manager, Regional

Environmental Affairs

RSH:has

As to introductory statement including general and specific objection,

William J. M. Sparks
William J. M. Sparks