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BS

Brown & Sharpe Manufacturing Company

Precision Park
North Kingstown
Rhode Island 02852, U.S.A
Telephone 401-886-2000
TLX 681-4067 SHARPE
FAX 401-886-2762

September 29, 1988

Superfund Records Center
SITE: LORR OH 00
BREAK: 11.9
OTHER: 639811
BROWN & SHARPE MANUFACTURING INC

Ms. Lynn Fratus
U. S. Environmental Protection Agency (LRR 695)
P. O. Box 3254
Reston, Virginia 22090

Re: Information Request Concerning Landfill and Resources Recovery, Inc.

Dear Ms. Fratus:

Enclosed please find the written response of Brown & Sharpe Manufacturing Company to EPA's Information Request in the above matter along with copies of documents responsive to such request. Please note that copies of portions of the Company's income tax returns for the preceding five year period are submitted under a CLAIM OF CONFIDENTIALITY pursuant to those laws referenced in paragraph five of the Information Request.

We look forward to receiving documents from EPA which will allow us to better evaluate this situation.

Sincerely,

BROWN & SHARPE MANUFACTURING COMPANY

James J. Andrade

James J. Andrade
Plant Engineer

JJA:aap

Enclosure

SEMS DocID 639811

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THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ("EPA")

In the Matter of Landfill & Resource Recovery Inc.
North Smithfield, Rhode Island

BROWN & SHARPE MANUFACTURING COMPANY'S
("Brown & Sharpe" or the "Company")
RESPONSES TO EPA INFORMATION REQUEST

General Information

1. a. James J. Andrade of [redacted] in his capacity as Plant Engineer, Brown & Sharpe Manufacturing Company, Precision Park, North Kingstown, RI 02852 (401) 886-2000 with respect to General Information, Generator Information, and Transporter Information.

1. b. I have consulted with James W. Hayes III, Esq., Corporate Counsel for Brown & Sharpe, Precision Park, North Kingstown, RI 02852 (401)886-2000 and Colburn Cherney, Esq., Ropes & Gray, 1001 Pennsylvania Ave., Suite 1200, Washington, D. C. 20004, (202)626-3900 special counsel for the Company, in connection with preparation of the responses submitted herein:

1. c. See copies of documents submitted referenced in each Response as appropriate.

1. d. Brown & Sharpe's EPA RCRA Identification Numbers are RID001191246 for its Precision Park location and RID001191253 for its former Greystone, North Providence location now discontinued.

1. e. The Company has no knowledge of any such acts or omissions of any persons described in Request 1.e. However, since the Company did not to its knowledge generate hazardous substances which are now located at the Site, nor did the Company transport any hazardous substances to the Site, any release or threat of release of hazardous substances and damages resulting therefrom must necessarily have been caused by acts or omissions of other persons. The Company expressly reserves any and all defenses to liability in this matter including, without limitation, defenses based on acts or omissions of third parties.

1. The Company took all possible precautions against foreseeable acts or omissions of any third party and the consequences that could foreseeably result from these acts or omissions. In particular, the Company followed regulations and directives given by the Department of Environmental Management then in effect in

Rhode Island and implemented its own internal policies incorporating such regulations to determine whether industrial waste generated in its manufacturing processes was categorized as being hazardous or non-hazardous; and, where appropriate verified such determinations with an independent testing laboratory. The Company would deliver its non-hazardous industrial waste material to a licensed solid waste disposer for disposal at licensed sanitary landfills and its hazardous waste material would be picked up by a licensed hazardous waste hauler and delivered to a licensed hazardous waste disposer.

2. The Company exercised due care with respect to all substances, taking into consideration the characteristics of those substances in light of all relevant facts and circumstances.

1. f. The Company believes there is/are no such persons other than the following waste haulers/disposers used by the Company:

C. W. Miller Inc., 1 Hodsell St., Cranston, RI 02910
Goditt & Boyer, Inc. P. O. Box 1058, Attleboro, MA 02703

1. g. Other than James J. Andrade a present employee of the Respondent and F. T. Cameron former Plant Maintenance Manager of Brown & Sharpe (now deceased) the only other persons who have or may have had such knowledge or information of materials at the Site would be the waste haulers/disposers used by the Company: C. W. Miller, Inc., 1 Hodsell St., Cranston, RI 02910 (401) 461-7330 and Goditt & Boyer, Inc., P. O. Box 1058, Attleboro, MA 02703 (401) 724-4040.

1. h. The persons identified in Response to Request 1.g.

Generator Information

2. The Company does not have any documentary information indicating individuals who may have arranged for disposal of materials at the Site. Individuals who, acting in their capacities as employees of Brown & Sharpe, were responsible for arranging for materials to be removed from the Brown & Sharpe plant included:

F. T. Cameron formerly Plant Maintenance Manager for Brown & Sharpe (now deceased). See copy of letter dated March 25, 1981 from F. T. Cameron to Ms. Fucarile of Ecology and Environment, Inc. submitted with response. James J. Andrade currently Plant Engineer for Brown & Sharpe and Richard Hargreaves formerly with the Company's purchasing department.

2. a. Arrangements would have been made with either Goditt & Boyer, Inc., P. O. Box 1058, Attleboro, MA. 02703 or C. W. Miller, Inc., 1 Hodsell St., Cranston, RI 02910.

2. b. The Company does not have information sufficient to answer this question with any degree of certainty. The Company has only two documents which might indicate that materials were sent to the

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Site. First, the Company has the manifest which it received earlier this month from EPA. Second, it has the letter referenced in Answer No. 2. from Brown & Sharpe which states Mr. F. T. Cameron's understanding that grinding sludge was sent to the Site. However, the Company has no additional information about dates or volumes of materials being sent to the Site. The Company does have a purchase order numbered 63722 which it notes is the same number as the manifest provided by the EPA (copy enclosed). In addition, the Company has invoices some of which note the purchase order number 63722 reflecting transactions with Goditt & Boyer, Inc. a waste hauling company, which invoices reflect the pickup of materials, but in which there is no indication of their ultimate disposal. Therefore, these invoices do not appear to be responsive to this request, and are not being submitted herein.

Because the Company has always carefully segregated its hazardous waste from its non-hazardous waste and sent the former only to appropriate hazardous waste facilities, the Company does not believe that any materials then regarded as hazardous were sent to the Site.

2. c. The Company does not believe it delivered any material deemed hazardous under regulations then in effect to any hauler or disposer for disposal at the Site. See also Answer 2.b.

2. d. See Answer 2.b.

2. e. Not Applicable. See Response Nos. 2.c. and 2.d.

2. f. As noted above, the Company has routinely segregated its hazardous waste from its non-hazardous waste. When there has been any question about the status of a waste, that waste was tested by an independent laboratory. See the copy of the Certificate of Analysis of New England Testing Laboratory dated 4-2-79 of grinding swarf material. This indicates no hazardous material was involved.

2. g. Brown & Sharpe has no knowledge of the precise location(s) at the Site where any material either hazardous or non-hazardous may have been disposed of or treated.

2. h. Brown & Sharpe did not select disposal or treatment sites, and believes that the particular hauler/disposer of the non-hazardous grinding swarf would choose the precise location at the Site where any such material would be disposed of.

2. i. Brown & Sharpe believes it did not dispose of any material then categorized as hazardous at the Site.

2. j. Brown & Sharpe believes that it paid its solid waste hauler/disposer, Goditt & Boyer, Inc., approximately $10.00 per 55 gallon drum and C. W. Miller, Inc., approximately $40.00 to $50.00 per 55 gallon drum for pick-up and disposal of its waste grinding swarf.

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2. k. Not Applicable. See Response 2.i.

2. l. Brown & Sharpe has no knowledge of or information relating to any such intermediate sites.

2. m. Brown & Sharpe believes it did not send any material then classified as being hazardous material to the Site.

2. n. Not Applicable. See Response 2.m.
2. o. Brown & Sharpe would follow the procedures set forth in response 1.e.1 with regard to handling any of its hazardous waste material.

2. p. Not Applicable. See Response 2.m.

Transporter Information

3. As noted above, documentary evidence indicating persons who may have transported materials to the Site is limited to the manifest supplied by EPA. However, the transporters utilized by the Company are:

Goditt & Boyer, Inc.
P. O. Box 1058
Attleboro, MA 02703 (401) 724-4040

and,

C. W. Miller, Inc.
1 Hodsell Street
Cranston, RI 02910 (401) 461-7230

3. a. The Company cannot answer with any degree of certainty where its non-hazardous waste might have been disposed. The transporters named above transported both rubbish and solid industrial waste material in the form of grinding sludge composed of fine metal and grinding wheel particles. The Company is unable to determine from its records the exact quantity of any such material accepted for and actually transported to the Site for disposal.

3. b. Brown & Sharpe believes it did not deliver any material categorized as hazardous waste material to any transporter for transportation to and disposal at the Site.

3. c. Not Applicable. See Response 3.b.

3. d. Not Applicable. See Response 3.b.

3. e. Not Applicable. See Response 3.b.

3. f. Not Applicable. See Response 3.b.

3. g. Not Applicable. See Response 3.b.

3. h. Not Applicable. See Response 3.b.

3. i. Not Applicable. See Response 3.b.

3. j. Not Applicable. See Response 3.b.

3. k. Not Applicable. See Response 3.b.

3. l. Not Applicable. See Response 3.b.

3. m. Not Applicable. See Response 3.b.

3. n. Not Applicable. See Response 3.b.

3. o. Not Applicable. See Response 3.b.

3. p. Not Applicable. See Response 3.b.

3. q. Not Applicable. See Response 3.b.

Financial/Corporate Information

Furnished by the following persons:

James W. Hayes III, Redact Redact Assistant Secretary and Corporate Attorney, Brown & Sharpe Redact

and,

John M. Lochner, Redact Redact, Corporate Controller, Brown & Sharpe, (401) 886-2350

4. a. Brown & Sharpe Manufacturing Company

Donald A. Roach, President and Chief Executive Officer, Redact Redact

Henry D. Sharpe, Jr., Chairman of the Board, Redact

4. b. The Company currently is and has continuously been an independent company.

4. c. Delaware, The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801. See Response 1.d. for current and former EPA Identification Numbers of Brown & Sharpe.

4. d. Brown & Sharpe and its domestic and foreign subsidiaries manufacture a line of metal cutting machine tools and related

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repair parts and accessories and a line of quality control and precision measuring tools, instruments, gages, machines and equipment. Brown & Sharpe's principal U. S. manufacturing location is at Precision Park, North Kingstown, RI, where the Company machines and fabricates metal parts, and assembles such parts and other purchased parts comprised of various materials and including electric and electronic components into its finished products.

4. e. Brown & Sharpe has operated at its North Kingstown, RI facility since 1966 and prior to that time operated since at least as early as 1900 out of its manufacturing facility on Promenade Street, Providence, RI. In addition, Brown & Sharpe operated a cutting tool manufacturing facility at a plant located at 140 Waterman Ave. Greystone, North Providence, RI since at least as early as 1940 until it discontinued those operations in 1982 and sold the plant on January 31, 1983.

4. f. 1-3. Comprehensive General Liability ("CGL") insurance primary coverage with The Aetna Casualty and Surety Company, Hartford, CT 06115 from 1976 to January 1, 1985 and Liberty Mutual Insurance Company, Weston, MA 02193 from January 1, 1985 to the present. In addition, excess umbrella liability coverage provided during the various annual policy periods by the excess carriers identified below. The principal insureds under such policies are Brown & Sharpe Manufacturing Company and its domestic subsidiaries.

LIBERTY MUTUAL CGL OCCURRENCE COVERAGE POLICIES

Policy Period	
2-1-88 to 2-1-89	Liberty Mutual CGL Policy No. 111-004178-038, $3M/$3M; Excess Liability U. S. Fire Insurance Company Policy No. 523-475899-2 $4M/$4M
1-1-87 to 1-31-88	Liberty Mutual CGL Policy No. LG1-612-004178-037 $3M/$3M; Excess Liability U.S. Fire Insurance Company Policy No. 523-471951-8, $4M/$4M
1-1-86 to 1-1-87	Liberty Mutual CGL Policy No. LG1-612-004178-036, $2M/$2M; Excess Liability U.S. Fire Insurance Co. Policy No. 523-4522706 $10M/$10M over primary
1-1-85 to 1-1-86	Liberty Mutual CGL Policy No. LG1-612-004178-035, $1M/$1M Excess Liability U.S. Fire Insurance Policy No. 523-373849-1 $25M/$25M Excess Liability Federal Insurance Co. $10M/$10M

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AETNA CGL OCCURRENCE COVERAGE POLICIES

Policy Period	
1-1-84 to 1-1-85	Aetna CGL Policy No. 43GL 217611 SRA $1M/$1M Excess Liability U. S. Fire Insurance Policy No. 523-2985083 $30M/$30M
1-1-83 TO 1-1-84	Aetna CGL Policy No. 43GL 217601 SRA $1M/$1M Excess Liability Mission Insurance Company Policy No. 881588 $30M/$30M
1-1-82 to 1-1-83	Aetna CGL Policy No. 43GL 1241 SRA $1M/$1M Excess Liability Mission Insurance Co. Policy No. M 881423 $30M/$30M
1-1-81 to 1-1-82	Aetna CGL Policy No. 43GL 1230 SRA $1M/$1M Excess Liability Mission Insurance Co. Policy No. 870885 $25M
1-1-80 to 1-1-81	Aetna CGL Policy No. 43GL 20 SRA $1M/$1M Excess Liability Pacific Employers Insurance Co. Policy No. 003434 $15M and Mission Insurance Co. Policy M 852766 $10M
1-1-79 to 1-1-80	Aetna CGL Policy No. 43GL 5 SRA $1M/$1M; Excess Liability Aetna 43 XS 1716 SCA $10M/$10M
1-1-78 to 1-1-79	Aetna CGL Policy No. 43 AL 144064 SRA $1M/$1M; Excess Liability Aetna 43 XS 1710 SCA $10M/$10M
1-1-77 to 1-1-78	Aetna CGL Policy No. 43 AL 144055 SRA $1M/$1M; Excess Liability Aetna 43 XS 1704 SCA $10M/$10M
1-1-76 to 1-1-77	Aetna CGL Policy No. 43 AL 144038 SRA BI $1M/$1M PA $500K/$1M; Excess Liability Aetna 43 XS 928 SCA

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Great American Surplus Lines Insurance
Company - Claims Made Environmental
Impairment Insurance Policies

During the policy periods of 1-1-83 to 1-1-84 and 1-1-84 to 1-1-85 the Company maintained the above referenced insurance under Policy Nos. 3 CM 01348 and 4 CM 01854 respectively having limits of $5M per occurrence/$10M in the aggregate. Such policies were discontinued after January 1984 as coverage was no longer commercially available in the marketplace.

4. f. 4-5 Beginning with policy year 1-1-86 and continuing to the present the Liberty Mutual CGL policies contain a standard "POLLUTION EXCLUSION" clause in the form as attached to these Responses as Exhibit A. With respect to CGL policy years prior to 1-1-86 such policies contained policy "Exclusions" which purport to exclude coverage for personal injury or property damage arising out of the discharge or release of pollutants except in the event such discharge or release is sudden and accidental in the form as attached to these responses as Exhibits B and C.

4. g. Copies of a portion of Brown & Sharpe's consolidated U.S. Income Tax Returns for the years 1982 through 1986 consisting of Form 1120 are submitted with this Response subject to and conditioned upon a CLAIM OF CONFIDENTIALITY which is asserted under the regulations and laws referenced in paragraph 5 of the Instructions accompanying the Information Request. The entire federal tax return, consisting of all of the various supporting schedules is not being produced at this time as it is too voluminous to copy however if such documents are required to be produced, the Company will provide them at a later date upon the specific request of EPA subject, however, to the same claim of "Confidentiality."

4. h. See the Company's 10K Reports as on file with the Securities and Exchange Commission produced herewith for the requested periods which include the Financial Statement information requested.

4. i. See the Company's statement of assets and liabilities set forth in its latest 10Q Report for the period ending June 25, 1988 produced herewith as on file with the Securities and Exchange Commission. The Company's shares are publicly traded on the New York Stock Exchange.

4. j. The Respondent is the parent corporation. See the list of subsidiaries below:

Name of Subsidiary	Jurisdiction of Incorporation	Percentage of Voting Power Owned by the Registrant
Borel & Dunner, Inc. (non-manufacturing)	Michigan	100%

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Name of Subsidiary	Jurisdiction of Incorporation	Percentage of Voting Power Owned by the Registrant
Brown & Sharpe Financial Company (non-manufacturing)	Delaware	100%
Standard Gage Company, Inc.	New York	100%
Technicomp Inc. (non-manufacturing)	Delaware	80%
Brown & Sharpe International Capital Corporation and its subsidiaries: (non-manufacturing)	Delaware	100%
Brown & Sharpe A.G.	Switzerland	100%
Tesa, S.A. and its subsidiary:	Switzerland	100%
Etalon, S.A. and its subsidiaries:	Switzerland	100%
P. Roch, S. a. R.L.	Switzerland	100%
Interapid, S.A.	Switzerland	100%
Ludwig-Metrologie	Switzerland	100%
Tesa Systemmesstechnik G.m.b.h.	West Germany	75%
Tesa Seimitsu KK	Japan	100%
Brown & Sharpe Group Ltd.*and its subsidiaries:	United Kingdom	100%
Brown & Sharpe Ltd.	United Kingdom	100%
Tesa Metrology Systems Ltd.	United Kingdom	86.5%

*Owned 55.5% by Brown & Sharpe International Capital Corporation and 44.5% by Tesa, S.A.

4. k. See copies of the Company's Articles of Incorporation and By-Laws produced herewith.

4. l. The Company's executive officers and principal shareholders are set forth in its latest Proxy Statement produced herewith and as on file with the Securities and Exchange Commission.

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New England Testing Laboratory, Inc.
Chemists Bacteriologists
TEL. 353-3420
MILK & ICE CREAM
FOODS & BEVERAGES
WATER & WASTES
METALS & TEXTILES
INDUSTRIAL MICROBIOLOGY
1254 DOUGLAS AVENUE, NORTH PROVIDENCE, RHODE ISLAND 02904

Certificate of Analysis

Noted
JC
4/3/79

TO: Brown & Sharpe Mfg. Co.
Precision Park
No. Kingstown, RI
Attn: Mr. J. Andrade

DATE REPORTED: 4/2/79
DATE RECEIVED: 3/26/79
ORDER NO.
CASE NO. 90326-09

SAMPLE DESCRIPTION Submitted Sample of Grinding Swarf

SUBJECT: Chemical Analysis as per Rhode Island Hazardous Waste Rules and Regulations, effective 21 December 1978.

RESULTS:

The material has been determined to be a granular solid of iron and silicate composition. Organic compounds were detected at less than 1.0% concentration.

This material is considered non-hazardous.

NEW ENGLAND TESTING LABORATORY, INC.

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BILL POSTED	DATE OF RECEIPT 11-9-79	PURCHASE ORDER NO. 63722
DATE OF BILL 10-1-79	THIS COMPLETES YOUR ORDER	DATE PUT INTO STOCK / /
AMT. OF BILL 718.00	RECEIVED BY [signature]	

TO:

Coditt & Boyer, Inc.
205 O'Neil Boulevard
P.O. Box 1058
Attleboro, MA 02703

DATE OF ORDER	WANTED IN B & S	DELIVER TO	DEPT. NO.	APPROP. NO.	TIME NUMBER
11-30-78	1979	Maint. Dept. R. Palumbo	5134		5134-469
QUANTITY	UNIT OF MEAS.	B & S PRODUCT CODE		QUANTITY	UNIT OF MEASURE

DESCRIPTION

Per quotation of 11-22-78 from Mr. Robinson to Mr. Hargreaves, provide trash and sludge removal service from Precision Park in 1979. Rental of compector $158/month. Hauling charge per load of solid waste - $35.00. Sludge removal at $10/drum in lots of 20 drums.

AUDIT COPY

821-233-1

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Approx. Cost $7,500 Requested By _____ Approved By _____

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ecology and environment, inc.
30 EAST CUMMINGS PARK, WOBURN, MASSACHUSETTS 01801, TEL. 617-935-0228
International Specialists in the Environmental Sciences

Noted
JVC
3/18/81

March 17, 1981

Mr. F. T. Cameron
Brown & Sharpe Manufacturing Company
Precision Park
N. Kingstown, RI 02852

Dear Mr. Cameron:

The U.S. Environmental Protection Agency (EPA), has contracted with Ecology and Environment, Inc. (E & E) 30 East Cummings Park, Woburn, Massachusetts to assist in performing environmental inspections and site assessments for those uncontrolled areas in New England suspected of containing hazardous wastes.

Presently, Ecology and Environment, Inc. is performing an assessment of Landfill and Resource Recovery, Inc. located in North Smithfield, Rhode Island.

On 1977 - 1978 manifests obtained from Landfill & Resource Recovery, Brown & Sharpe Manufacturing Company was listed as a generator of hazardous wastes which reportedly were deposited in the landfill.

We solicit your cooperation by providing us with information regarding types of waste generated by your operation which might exist at the landfill. All information provided by your firm will be compiled by E & E, and submitted to the U.S. EPA. Claims of confidentiality will be honored by E & E and forwarded to EPA for review under the federal procedures to determine if the information can be treated as confidential. We would appreciate your response to the following questions by March 25, 1981.

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In congruence with the 1980 - 1981 Rhode Island Hazardous Waste Manifest files, we have compiled a list of hazardous wastes currently produced by Brown & Sharpe Manufacturing Company.

1. Has your process changed significantly in the last 3-4 years? If so, please elaborate as to the waste byproducts generated.

2. Are your current hazardous waste byproducts the same or similar to those produced during each year from 1976-1979? If not, please explain how they differ.

3. Are the quantities of hazardous wastes being generated by your firm in 1981 expected to be of the same volume as those produced during each year from 1976-1979? If not, what percentage increase/decrease would you apply to each of those years?

Thank you for your cooperation.

Very truly yours,

ECOLOGY AND ENVIRONMENT, INC.

Lori J. Fucarile

Lori J. Fucarile

LJF/rp

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Brown & Sharpe Manufacturing Company

Precision Park
North Kingstown
Rhode Island 02852, U.S.A.
Telephone 401-886-2000
Telex 92-7771 or 92-7772
TWX 710 382-1506
Cable-Sharpe

March 25, 1981

Miss Lori J. Fucarile
Ecology and Environment, Inc.
30 East Cummings Park
Woburn, MA 01801

Dear Miss Fucarile:

This will acknowledge receipt of your letter of March 17, 1981. We are submitting this information voluntarily and expect that it will be kept confidential by E&E and will be forwarded to EPA in a manner to assure its confidential treatment.

At the outset, I wish to make it clear that as regulations have been developed and implemented by Rhode Island and EPA covering the disposal of hazardous wastes, Brown & Sharpe has been meticulous in compliance procedures and practices for these activities. We have coordinated our efforts carefully with the appropriate government officials.

Our record of compliance with EPA and Rhode Island environmental regulations over many years is one of which we can be justly proud. We intend to maintain this excellent record.

On page 2 of your letter, you refer to an inspection of Brown & Sharpe's 1980-1981 Rhode Island Hazardous Waste Manifest files. These same manifests also make it very clear that all such hazardous wastes were sent to Recycling Industries in Braintree, Massachusetts and <u>were not placed in any Rhode Island Landfill Sites</u>.

My impression from reading your letter is that you assume that the materials listed in the 1980-1981 Rhode Island Hazardous Waste Manifest files were all deposited in the Landfill and Resource Recovery, Inc. facility in North Smithfield, Rhode Island in years prior to 1980. <u>Such is not the case</u>!

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For a period prior to May, 1979, we shipped a number of drums of grinding sludge to the North Smithfield site. Per analysis by New England Testing Laboratory dated April 2, 1979, this material was analyzed and classified as non-hazardous. New England Testing Laboratory is a private facility located in North Providence, Rhode Island with a well established reputation.

With regard to your specific questions, I can comment as follows:

1. Our process has not changed significantly in recent years.

2. Our present waste products are similar to those generated in previous years.

3. Our level of business in 1980 was somewhat higher than in earlier years, but I have no way to quantify changes in levels of wastes generated.

In conclusion, I wish to emphasize that it would be completely fallacious for you to draw any conclusions about hazardous wastes at the North Smithfield location by referring to 1980-1981 hazardous waste manifests from Brown & Sharpe.

I trust this the foregoing information will be of value in completing your EPA assignment.

Yours very truly,

BROWN & SHARPE MANUFACTURING COMPANY

F T Cameron

Frank T. Cameron
Maintenance Manager

FTC/cew

Brown & Sharpe Manufacturing Company AND SUBSIDIARIES	PAGE 1 OF 4 PROCEDURE	1.1.3.13
APPROVED BY:	SUBJECT DISPOSAL OF HAZARDOUS WASTES AT RHODE ISLAND OPERATIONS	DATE ISSUED 1/31/78
		DATE REVISED 10/22/80

Purpose

The purpose of this procedure is to establish the method for legal disposal of industrial wastes from Rhode Island Operations in a manner to comply with Federal EPA and State of Rhode Island EPA regulations.

Regulations in Effect

State of Rhode Island Hazardous Waste Generator Rules and Regulations effective December 20, 1979.

Federal Resource Conservation and Recovery Act of 1976 (RCRA) Public Law 94-580 subtitle C.

Definitions:

Industrial wastes are those wastes produced by an industrial process including industrial waste sludge, but excluding non-contact cooling water and solid waste. (Examples are grinding sludge, used coolants, spent degreasers, phosphate cleaners, acids, plating sludges, etc.)

Solid waste is garbage, refuse and other discarded solid material generated by an industrial or commercial process.

Procedure

Industrial waste must be removed from the plant by an authorized hazardous waste hauler and delivered to a licensed hazardous waste disposal facility. Industrial waste cannot be dumped onto the ground nor into waterways. Solid waste will continue to be disposed of per present practice.

Penalties

The criminal penalty for disobeying the provisions of the State of Rhode Island regulations is 5 years in prison or a $25,000 fine.

The Federal penalty is the same as the State penalty and may be imposed in addition to any State penalties.

RESPONSIBILITY	ACTION
Purchasing Department	1. Select the authorized licensed waste hauler to remove industrial waste from the plant.
Department Managers	1. For used chemicals, plating wastes, or toxic materials, identify such to be removed from the plant.

RESPONSIBILITY	ACTION
Department Managers (cont'd)	2. Notify Plant Engineer.
	3. Authorize issuance of a purchase order to collect and remove such industrial waste from the plant.
	4. Train and instruct Shop Foreman on proper handling and disposal of hazardous wastes.
Shop Foreman	1. Establish a fixed location for pickup of hazardous waste material.
	2. Segregate materials to be disposed of so that each drum contains only one material.
	Note: Any Department mixing material will be responsible for disposal costs of $500 per drum or more.
	3. Fill out and affix an authorized label to each drum (see completed sample).
	Note: No material will be removed and transported by the Maintenance Department unless it has a properly completed label. Labels are available from the Foreman of Riggers and Cleaners.

BROWN & SHARPE
Precision Park, N. Kingstown, RI 02852

HAZARDOUS WASTE

Federal Law Prohibits Improper Disposal. If Found, Contact the Nearest Police, or Public Safety Authority, or the U.S. Environmental Protection Agency.

*DOT Shipping Name
EPA Name
RI Generic Name DEGREASER

**RI Waste Type 1A **DOT UN or NA Number 2831 **EPA Number RI HID Number F001

*Name 1,1,1, TRICHLOROETHANE

*B&S Dept. No. 5555 *Foreman's Name I. M. WASTEMAKER

*Date of Containerization 11/20/80 **RI Hazardous Waste Manifest Number 00022

HANDLE WITH CARE!

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117099

RESPONSIBILITY	ACTION
Manager of Maintenance	1. Instruct foreman in procedures required to attain the purpose described.
Foreman of Riggers & Cleaners	1. Instruct Cleaners in procedures required to attain the purpose described.
	2. Verify all drums to be disposed of to have a correctly filled out label.
	3. Call the Plant Engineering Department to initiate a manifest for the materials to be removed.
	4. After receiving manifest, insert all data required on label. Use a large indelible ink pen.
	5. Call the hazardous waste transporter and schedule material to be removed. Also obtain the signature of the transporter on the manifest.
	6. Remove Copy B&C of manifest and return to the Plant Engineering Department.
Plant Engineer	1. Upon receipt of request to dispose of hazardous materials, determine the potential hazard using known information and laboratory assistance.
	2. Establish the hazard waste rating to be used on the Rhode Island Hazardous Waste Manifest.
	3. Provide DOT UN or NA number, EPA number and RI HID number to Foreman of Riggers and Cleaners for each hazardous waste.
	4. Initiate the Hazardous Waste Manifest upon receipt of a call from Foreman of Riggers and Cleaners.
	5. Forward Copy B of Hazardous Waste Manifest to State EPA weekly.
	6. Establish a Hazardous Waste Manifest folder to contain Copy C&G.

RESPONSIBILITY	ACTION
Plant Engineer (cont'd.)	7. Monthly review Hazardous Waste Manifests to verify Copy C&G are matched.
	8. If no Copy G (final destination verification) has been received, initiate a tracing action to locate wastes shipped on that manifest.
	9. Authorize issuance of a purchase order to remove hazardous waste.
	10. Greystone should handle its own industrial hazardous waste disposal and maintain its own log.

WARNING

The source of any hazardous waste (in this case Brown & Sharpe) is responsible for violations of State and Federal EPA/DOT regulations that result from improper disposal of such hazardous industrial wastes at any unlicensed sanitary landfill site, incineration or reclamation site.

Review Responsibility: Maintenance Manager

Review Date: January, 1981

Distribution: All Rhode Island Holders of Management Guide

INTERNAL MEMORANDUM

TO: Mr. J. Bator - Greystone

FROM: Frank T. Cameron

SUBJECT: Disposal of Hazardous Wastes

DATE October 5, 1981

On December 20, 1979, Rhode Island Regulations for the disposal of hazardous wastes became effective. These regulations are among the most rigorous in the United States and Rhode Island was the first state to issue them. Violation of these regulations is a felony that carries a fine of up to $25,000 and a jail sentence of up to five years. Five Cannon Engineering employees were indicted for polluting water supplies in Lowell, Mass. and these people were sentenced to jail terms. From our observations, there are many companies in New England which have serious problems. Some well known names are included in this list.

Jim Andrade and I have taken these regulations seriously and have made a conscious effort to be "as clean as a hound's tooth" in this area. Just last week, two people from the Rhode Island Department of Environmental Management visited Precision Park and spent four hours conducting an exhaustive inspection of our procedures, facilities and equipment as well as our practices. But for a few minor items, they left well satisfied with what they saw.

In view of your telephone call to me last week with regard to the disposal of some stored used coolants, it is quite evident that you have important work ahead of you. It is important to remember that the generator of the wastes (Greystone in your case) is fully responsible for the ultimate disposal of any wastes generated at your facility.

Attached is a letter from Ecology and Environment, Inc. regarding the North Smithfield landfill site. Also attached is my reply. Because we were "clean", I was able to reply in this manner. It was the intent of Miss Lori Fucarile to forward to EPA the names of companies who are the polluters. Needless to say, the media will be on hand to handle the "good news". Greystone has already had one such media event.

Jim Andrade and I are ready and willing to provide any information and assistance requested of us. Procedure 1.1.3.13 in the Management Guide covers our approach to the disposal of hazardous wastes. Rest assured there are no "short-cuts". Please call us if you wish our assistance.

F. T. Cameron

Frank T. Cameron

/cew

cc: Messrs. J. Andrade, C. Bradbury, W. Masser, C. Parrillo
R. Hargreaves

117096

TO: R. A. Jimmo

FROM: F. T. Cameron

SUBJECT: Hazardous Waste Disposal at Precision Park and DEM Citation Dated 12/14/82

February 16, 1983

Disposal of hazardous wastes at Precision Park is being handled in accordance with Procedure 1.1.3.13 issued 1/31/78 and reissued 5/10/82. Following this procedure places us in compliance with appropriate EPA and DEM regulations. With regard to the loading, transport and disposal of hazardous wastes from Precision Park since January, 1978, our record is spotless.

In the light of the recent declaration by EPA that the Landfill, Resources and Recovery Site in North Smithfield is one of the fifty worst hazardous waste disposal sites in the U.S.A., our spotless record and complete data are significant and of value to Brown & Sharpe. The cost of clean-up will be borne by the companies whose hazardous wastes are buried there. Clean-up of the Picillo Pig Farm in Coventry cost $8.5 million.

EPA is suing the companies responsible to recover the clean-up cost. About three years ago, a lady on the North Smithfield Town Council called me to inquire if we were continuing to send our hazardous wastes to Landfill, Resource and Recoivery Site in that community. Based on our complete records, I was able to inform her that nothing had been sent there since 1979 and that prior to that only a few drums of grinding sludge had been shipped there. This grinding sludge was checked by New England Testing Laboratory and was found to be non-hazardous and non-toxic.

Because their water supply has been polluted, North Smithfield prevailed upon EPA to determine the exact nature of the problem and implement required corrective action. EPA hired Ecology and Environment, Inc. to make an investigation and report to EPA in Washington. Ecology and Environment, Inc. contacted us, and were were able to specify that Brown & Sharpe is in the clear. Some other Rhode Island companies will not be so fortunate.

The DEM citation dated December 14, 1982, refers to internal administrative matters which are essentially minor in nature. Following is a summary of the four items contained in that citation along with a statement of their present status.

1. Develop, distribute and maintain a written contingency plan in the event of a hazardous waste spill, fire or explosion. This contingency plan was prepared and mailed to the DEM Director on January 17, 1983 as required. We are awaiting their comments.

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2. The outline of a training plan was also submitted to the DEM Director on January 17, 1983 for review and approval. We are awaiting their comments. In the meantime, Messrs. Andrade and McKenna will complete the required training for our maintenance people by March 4, 1983.

3. EPA Regulation 264.175 requires proper containment in case of a spill in the hazardous waste storage area. In our case, we store our hazardous wastes in drums (maximum of 50 drums) in storage racks inside the building. We objected to a containment system which would interfere with the storage and removal of these drums. We requested a hearing with the DEM Director on this matter.

   At an informal hearing on February 8, 1983, attended by Messrs. Andrade, Hayes and myself plus several DEM representatives and their legal counsel, we recommended that a simple "drip pan" with a five-inch (5") high lip be installed under the racks to collect spillage if it occurs. The idea was approved by Mr. Majkut of DEM. We shall fabricate and install the drip pan. DEM wishes to inspect the drip pan upon its completion and installation. We should be ready for this during the week of March 7.

4. The citation concerned itself with one label on one drum partly filled with used cleaning solvent which was not dated. We contested the interpretation of the regulation and reviewed this matter at the same informal hearing on February 8. Our position with DEM was two-fold:

   a. Even though our procedure specified dating labels, we could not guarantee 100% compliance on all drums in all areas throughout the factory and we certainly cannot afford to have extra people running around for this purpose. We did agree to distribute Procedure 1.1.3.13 to all factory supervisors once again.

   b. Technically, if a drum with used solvent is "stored" in any factory location for more than ninety (90) days, we are in violation of our permit. We stated that we are not interested in obtaining a "storage permit" and neither are we interested in being "ragged around" for a minor matter such as this. DEM suggested that on the types of material we use, they plan to

extend the ninety (90) day storage limit and that they would advise us of their decision. We believe this item can be resolved without a formal hearing which would undoubtedly include the media. DEM is well aware of our spotless record and our intent to be good citizens - within the bounds of reasonableness and good economics. Messrs. Andrade and Hayes are completely familiar with this matter and are fully capable of negotiating a proper solution.

I believe that the foregoing completely updates the status of this citation.

F. T. Cameron

FTC:mc

cc: J. J. Andrade
J. W. Hayes
W. J. Masser
E. F. McKenna
D. A. Roach
H. D. Sharpe, Jr.

MATERIAL IS BEING SUBMITTED UNDER A CLAIM OF CONFIDENTIALITY

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(b) (4)

Pages 26-113 have been redacted under Exemption (b)(4).