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SEMS DocID 641387

RCRA RECORDS CENTER
FACILITY Agency Ready
I.D. NO. CTD002104326
FILE LOC. R-5
OTHER

December 3, 1981

Lawrence M. Goldman
Acting Director
Enforcement Division
U.S. Environmental Protection Agency
Region I
J.F. Kennedy Federal Building
Boston, Massachusetts 02203

Attn: Lauren Stiller Rikleen, Esq.

Re: Carroll Products, Inc.

Dear Ms. Rikleen:

Pursuant to our discussions, the following information is submitted as the first phase of a response to Mr. Goldman's letter of October 26, 1981.

Question 1: List all products manufactured by Carroll Products, Inc., and its subsidiaries, branches, and/or divisions since such companies began doing business at Wood River Junction, Rhode Island.

Reply 1: This information is being generated and will be produced as we will agree during discussions next week.

Question 2: List any and all raw materials and laboratory chemicals used in the manufacture of the products listed in response to question 1.

Reply 2: See reply to question 1.

Question 3: List all waste products generated by the manufacture of the products listed in response to question 1.

Reply 3: We are awaiting a response from your offices on a threshold level to define the term "manufacture of products."

Question 4: List all past and present methods of disposal of the waste products listed in response to question 3.

Reply 4: We have not yet agreed on the scope of the reply to question 3. Generally speaking, however, wastes generated in these manufacturing operations have been either aqueous waste streams or spent solvent waste streams. Spent solvent streams have been re-claimed for use or removed from the site by a Rhode Island DEM-permitted transporter. Aqueous waste streams have been bulked and then removed by a Rhode Island DEM-permitted transporter to a state-permitted disposal site. Since when?

Question 5: List those chemical waste materials generated in the course of normal laboratory use by Carroll Products, Inc., and its subsidiaries, branches, and/or divisions since such companies began doing business at Wood River Junction, Rhode Island.

Reply 5: As in reply 3, above, we are awaiting your offices' consideration of a threshold reporting level to make our response to this question.

Question 6: List all past and present methods of disposal of the chemical waste materials listed in response to question 5.

Reply 6: We have not yet agreed on the scope of the reply to question 5, but as a general matter, laboratory waste streams in the past went down laboratory drains and were discharged to the active lagoon. Presently all laboratory waste streams are bulked and then combined with plant waste streams for disposal.

Question 7: List all past and present methods of disposal of all off-specification products.

Reply 7: Carroll Products, Inc., and its subsidiaries, branches and/or divisions do not engage in disposal of off-specification products. Products are manufactured to meet specifications, or are re-worked until they meet such specifications. Production in excess of purchase order quantities is inventoried for future sale.

Question 8: List all solvents used and spent solvents generated or used by Carroll Products, Inc., and its subsidiaries, branches, and/or divisions since such companies began doing business at Wood River Junction, Rhode Island.

Reply 8: The following solvents have been used and, in the course of production, have become spent solvents: toluene, isopropanol, methylene chloride, acetone, and methanol.

Question 9: List all past and present methods of disposal of any and all solvents listed in response to question 8.

Reply 9: Spent solvents are and have been reclaimed for use or removed by a Rhode Island DEM-permitted transporter.

Question 10: Report the approximate current amount of well water used each day by Carroll Products, Inc., and its subsidiaries, branches, and/or divisions doing business at Wood River Junction, Rhode Island.

Reply 10: We estimate that over a 5-day week, average daily usage of well water is approximately 1,000 gallons.

Question 11: Describe all past and present waste disposal practices for all waste water generated by Carroll Products, Inc., and its subsidiaries, branches, and/or divisions doing business at Wood River Junction, Rhode Island.

Reply 11: Aqueous waste streams, such as centrifuge filtrates and scrubber solutions have been bulked and removed from the site by a Rhode Island DEM-permitted transporter to a state-permitted disposal site. Floor washings and equipment rinsings have been released to the active lagoon but now are being bulked and removed from the site.

Question 12: Has Carroll Products, Inc., ever performed an analysis of the drinking water wells on the site? If yes, please include those results.

Reply 12: No wells on this site are used for drinking water. Well water used for cooling and processes has been tested by Princeton Testing Laboratory on April 10, 1980, the U.S. Nuclear Regulatory Commission on March 11, 1981, and Rhode Island Analytical Laboratories, Inc., on November 16, 1981. Results are enclosed. Unrelated portions of the Princeton report involving testing of three product samples, not well water, have been deleted from that report.

Question 13: Did the company ever use (i.e., for disposal) the inactive lagoon located behind the plant?

Reply 13: No.

Question 14: If the answer to question 13 is yes, list all waste materials disposed of in the inactive lagoon and the approximate gross amounts of each.

Reply 14: The reply to question 13 is no.

Question 15: List all materials which have been disposed of in the active lagoon by Carroll Products, Inc., and its subsidiaries, branches, and/or divisions since such companies began doing business at Wood River Junction, Rhode Island.

Reply 15: This reply, like those to questions 3 and 5, is awaiting your offices' consideration of a reporting threshold.

Question 16: Has Carroll Products, Inc., its subsidiaries, branches, and/or divisions ever manufactured, generated or otherwise used or disposed of chloroform in the course of its operations?

Reply 16: Carroll Products, Inc., its subsidiaries, branches and/or divisions has never manufactured, generated or used chloroform in production operations at this site. Small quantities have been used in the laboratory for testing purposes. Since 1977, a total of 15 pints of chloroform have been purchased, with 6 pints still in inventory in the laboratory.

how authorized these numbers so readily?

Question 17: If the answer to question 16 is yes, list all past and present methods of disposal of any waste chloroform.

Reply 17: In essence, the answer to question 16 is no.

Please contact me if there are any questions on these responses, or on the development of remaining responses.

Sincerely,

Lawrence W. Bierlein

Lawrence W. Bierlein

Enc.

COMPANY CONFIDENTIAL

Princeton Service Center
U.S. Route 1
609-452-9050

princeton testing laboratory

P.O. Box 3108, Princeton, NJ 08540

DATE: April 10, 1980

JOB NO. 10721

AUTHORIZATION: Verbal

SAMPLE: Water - 4

TO:

Carroll Products
PO Box 66
Wood River Jct., NJ 02894

ATT: A. Schwartz

REPORT OF ANALYSIS

	Lot 6003A	Lot 6003B	Lot 6003C	Plant Water	Maximum Contaminant Level For Drinking Water
Cadmium				< .01	.01
Chromium				< .01 ND	.05
Lead				< .05	.05
Mercury				< .002	.002
Silver				< .02	.05
Selenium				< .01	.01
Sodium				7.0	50
Chloride				15.7	250
Sulfate				13.6	250

Edna A. Alinea, Manager
Water, Waste Water, & Microbiology

Director

EAA; Smb

<- less than <. . ND – element is less than the value given and not detected by the technique employed >-greater than ND – not detected

RECEIVED MAR 13 1981

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

11 MAR 1981

Carroll Products
P. O. Box 66
Route 91
Wood River Junction, Rhode Island 02894

Gentlemen:

Subject: Radioactivity Analyses of Your Water Sample

This refers to the water sample collected from your Company during the week of December 7, 1980 by Messrs. T. Jackson and T. Thompson of this office. The analytical results indicate no unusual quantities of radioactivity were present in your water sample. Gross beta and gross alpha radioactivity analyses were performed on the sample. A gross alpha measurement consists of the total measured emission of nuclear particles consisting of two protons and two neutrons (a helium nucleus), commonly called alpha particles. Alpha particles carry a positive electric charge. A gross beta measurement consists of the total measured emission of electrons which originate in the nucleus of the atom. These particles carry a negative electric charge. The specific sample results in picocuries per liter (a picocurie is one trillionth of a Curie or 2.22 disintegrations per minute) are:

	Radioactivity	EPA Limits
gross alpha:	4 ± 1	15
gross beta :	Less than 8	50

A "less than" value indicates that the radioactivity in the sample was too low for our sensitive instrument to measure.

These results may be compared to the U. S. Environmental Protection Agency's National Interim Primary Drinking Water Regulations, published in Title 40, Code of Federal Regulations, Part 141. These regulations allow a maximum combined radium-226 and radium-228 concentration of 5 pCi/l, and a gross alpha particle activity (including radium-226 but excluding radon and uranium) of 15 pCi/l.

In addition, these regulations permit a gross alpha particle measurement as a substitute for radium-226 and radium-228 analyses provided the gross alpha particle activity does not exceed 5 pCi/l.

11 MAR 1981

The concentration of beta particle activity is limited to that concentration which will not produce an annual dose equivalent to the total body or any internal organ greater than 4 millirem per year.

The gross beta regulation can be assumed to be met if the concentration of gross beta activity is less than 50 pCi/l.

Your water sample satisfies these U. S. Environmental Protection Agency criteria.

Should you have any questions concerning these results, we would be pleased to discuss them with you.

Sincerely,

James M. Allan

for Boyce H. Grier
Director

R.I. Analytical Laboratories, Inc.

SPECIALIZING IN ENVIRONMENTAL ANALYSIS

231 ELM STREET
WARWICK, R. I. 02888

PHONE: (401) 467-2452

CERTIFICATE OF ANALYSIS

REPORT TO: Carroll Products
Rt. 91
Wood River Junction, RI 02894
Attn: Mr. Arthur F. Schwartz

DATE RECEIVED 11/3/81
DATE REPORTED 11/16/81
PURCHASE ORDER NO. C-6935-S
R.I.A.L. INV. NO. 5677

SAMPLE DESCRIPTION One well water sample

Per your request, subject sample has been analyzed by our laboratory with the following results:

PARAMETER	RESULTS	
Metals:		
Arsenic	<0.01	mg/l
Barium	<0.5	"
Cadmium	<0.005	"
T. Chromium	<0.05	"
Copper	<0.02	"
Iron	0.93	"
Lead	<0.05	"
Mercury	<0.0002	"
Nickel	<0.04	"
Silver	<0.01	"
Selenium	<0.005	"
Zinc	0.024	"

Volatile Organic Priority Pollutants:

methylene chloride	49 ppb
tetrachloroethylene &/or 1,1,2,2-tetrachloroethane	5 ppb

Note: A list of volatile organics tested for and their detection limits is attached.

If you have any question regarding this work or if we may be of further assistance, please contact us.

APPROVED BY Anthony E. Perrotti

VOLATILE ORGANIC PRIORITY POLLUTANTS

COMPOUND
chloromethane
dichlorodifluoromethane
bromomethane
vinyl chloride
methylene chloride
trichlorofluoromethane
1,1-dichloroethylene
bromochloromethane
1,1-dichloroethane
trans-1,2-dichloroethylene
chloroform
1,2-dichloroethane
1,1,1-trichloroethane
carbon tetra chloride
bromodichloromethane
1,2-dichloropropane
trans-1,3-dichloropropene
trichloroethylene
dibromochloromethane
cis-1,3 dichloropropene
1,1,2-trichloroethane
benzene
bromoform
tetrachloroethylene
1,1,2,2-tetrachloroethane
1,4-dichlorobutane
toluene
chlorobenzene
ethylbenzene

Detection limit: 1 ppb