

403SERBSF10,625

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Site Name (Subject): STEWART-WARNER CORP/BASSICK-SACK

Site ID (Document ID): NCD024895864

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Section: SUPERFUND

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RECEIVED
FEB 02 1993
SUPERFUND SECTION

JOHN J. BUTLER
PARTNER

February 2, 1993

Mr. Grover Nicholson
North Carolina Department of Environment,
Health & Natural Resources
Superfund Branch
401 Oberlin Road
Raleigh, North Carolina 27605

RE: Former Stewart-Warner Site in Winston-Salem
Currently Occupied by Ilco-Unican Corporation

Dear Mr. Nicholson:

I am writing on behalf of Stewart-Warner Corporation to address several inaccuracies contained in the April 1991 Phase I Screening Site Inspection Report prepared by Greenhorne & Omera, Inc. ("the Report"). As I have previously mentioned to you, Stewart-Warner believes the Report mischaracterizes Stewart-Warner's waste disposal practices at the site, Stewart-Warner's cleanup efforts, and Ilco-Unican's operations at the site. You suggested that I write you to make the administrative record clear concerning Stewart-Warner's position before any additional investigation is undertaken at the site.

The Report admits that "information regarding Stewart-Warner's waste disposal practices was not available" when the Report was prepared (Executive Summary, page ii), but it nonetheless concludes that "housekeeping practices at the facility during Stewart-Warner's occupation were very poor." No reference is given for the statement that Stewart-Warner's housekeeping practices were poor, and that statement is inaccurate. On the contrary, the Forsyth County Environmental Affairs Department described Stewart-Warner's housekeeping as "good." 1986 Inspection Report (Appendix C). As a retired plant engineer testified who had worked at the site from 1947 until 1989 (a year and a half after Ilco-Unican took over) "Stewart-Warner emphasized that we maintain a clean environment in the entire time of the operation." Blakley Dep., p. 62 (Appendix I). For example, while the Report notes at page 6 that plating sludge once had been stored on bare ground in the southern portion of the site before off-site disposal, it neglects to mention that prior to 1980 Stewart-Warner cleaned up that area by removing the

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February 2, 1993
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sludge pile and removing any contaminated soil under the sludge pile. Blakley Dep., pp. 50-55 (Appendix I). After 1978, plating sludge was stored in a tank. Blakley Dep., pp. 332-336 (Appendix I).

Because Stewart-Warner had interim TSD status after the RCRA regulations came into effect, the facility was inspected at least twice a year until it officially changed to generator status in 1987. Deposition of Steven Phibbs, pp. 14-16 (Appendix K). TSD interim status inspections are extensive, and if any non-compliance items were uncovered, the RCRA Unit would conduct a reinspection in addition to their twice a year regular inspection. Stewart-Warner properly addressed all issues raised by the RCRA Unit "and made appropriate corrections" when necessary. Phibbs Dep., pp. 272-273 (Appendix K).

The Report misleadingly states that there were "numerous spills" at the site. There were, however, only five documented spills, one in 1982, one in 1986 and three in 1987. Those all occurred in the same general area off to the side of the property and onto the nearby railroad track. Phibbs Dep., p. 295 (Appendix K). The Report neglects to mention that all of these spills were cleaned up under State supervision.

In its description of earlier reports, the Report recognizes some of Stewart-Warner's cleanup efforts but inaccurately characterizes them. For instance, the Report states at page 4 that "the vertical and horizontal extent of contamination [for spill contaminated soil] had not been fully determined." The Report neglects to state, however, that following the original site assessment, excavation was undertaken at the site and additional tests were done to determine that all contaminated soil was removed. Indeed, Mr. Steve Phibbs of the RCRA Unit who was on site to inspect the cleanup process testified that he was satisfied that the horizontal and vertical extent of contamination had been properly eliminated. Phibbs Dep., pp. 297-298 (Appendix K). The Report also erroneously concludes that the results of Stewart-Warner's post-excavation sampling analysis indicated that zinc and copper remained above the maximum acceptable contaminant levels established by the State. What the Report overlooks, however, is that the interim primary drinking water standard initially referred to by the State as a cleanup goal was simply a guideline, not a maximum contaminant level. See Phibbs Dep., p. 299 (Appendix K). The State's required cleanup level was finally determined as the cleanup progressed. In this case Stewart-Warner consistently met the State's requirements as shown by the permission given Stewart-Warner to back fill. See Phibbs Dep., pp. 300-301 (Appendix K). Indeed, Gary Babb, the head of the Hazardous Waste Compliance Unit

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which was responsible for overseeing Stewart-Warner's cleanup effort, has declared under oath that Stewart-Warner satisfactorily fulfilled its obligations with respect to the cleanup of the spill sites and pit areas. See Declaration of Gary D. Babb (Appendix H).

The Report also refers to a lawyer's memo with some attached test results for the proposition that significant contamination exists at the site. However, this is not borne out by the tests themselves. While trace amounts of solvents were apparently found in 4 out of 19 soil borings from an area where contamination was suspected, that alone does not indicate any wide-spread or significant contamination. On the contrary, Stewart-Warner has already done extensive excavation and testing in that area under State supervision to clean up all significant solvent contamination. With respect to the "dust" found on the roof of the facility, tests indicate that the roof material did not constitute a hazardous waste. Letter of August 27, 1992 (with test results) (Appendix B); letter of November 18, 1992 (with test results) (Appendix A). Moreover, there is no evidence that the roof material was actually susceptible to significant airborne or waterborne migration. Greenhorne & Omera did not even check to see if the material was loose.

We also think the Report inaccurately characterizes Ilco-Unican's operations at the site. The Report states that "in 1988, Ilco-Unican purchased the facility to manufacture zinc die cast logs." Executive Summary, p. ii. This is not true. When Ilco-Unican purchased the facility in February of 1988, it bought the existing inventory and equipment and retained most of the existing workforce for the express purpose of continuing the manufacture of furniture hardware. Notturmo Dep., pp. 59-61, 8-10 (Appendix J). Indeed, for over two years after taking over the Stewart-Warner Facility, Ilco-Unican continued the production of furniture hardware parts in much the same way as Stewart-Warner had operated in the previous 30 years. See e.g., Notturmo Dep., p. 57 (Appendix J), West Dep., p. 8, 20 (Appendix L). During this time Ilco-Unican also used PCE as well as other solvents and generated all the waste types listed on page 10 of the report. See 1989 Form R (Appendix D); 1989 Tier Two (Appendix E); 1989 Hazardous Waste Annual Report (Appendix F). Only in 1990 did Ilco-Unican decide to switch to the manufacture of lock and lock parts at the facility. 1990 RCRA Inspection Report (Appendix G). That resulted in the subsequent renovation of the facility in 1990 to retool for this new process.

The Report also fails to mention that before purchasing the site Ilco-Unican was provided an extensive site assessment of areas "outside Spill Sites 1 and 2." Stewart-Warner agreed to and did clean up Spill Sites 1 and 2 under state supervision, but the

Mr. Grover Nicholson
February 2, 1993
Page 4

parties specifically allocated all other environmental responsibility by contract. A copy of the relevant provisions of that contract is enclosed (Appendix M). Ilco-Unican assumed responsibility for the first \$150,000 of any cleanup costs and the contract limited Stewart-Warner's responsibility to certain specified hazardous waste cleanup only and only if specifically identified within three years of signing the contract. We believe the meaning of the contract is clear, but it is now the subject of federal court litigation.

We have not attempted to address all of the deficiencies in the Report. However, we believe we have pointed out enough deficiencies to bring into question the care with which the Report was undertaken and the Report's reliability. We believe that any determination concerning the hazards this site might present should be based solely on the results of the tests that your department intends to undertake in 1993. We anticipate that those tests will show that the site does not present a threat to the environment, to employees, or to the surrounding population.

Please let us know if we can provide you with any further information. We would appreciate being kept abreast of your analysis of the site.

Sincerely,



John J. Butler

JJB/ghd

Enclosure



A



POYNER & SPRULL
ATTORNEYS AT LAW

19

Keith H. Johnson
Direct Dial: 919/783-1013

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Raleigh, North Carolina 27612
Mailing Address:
Post Office Box 10096
Raleigh, North Carolina 27605-0096
919/783-6400
Fax: 919/783-1075
Offices:
Raleigh/Rocky Mount/
Charlotte/Greenville

November 18, 1992

John J. Butler, Esq.
Parker, Poe, Adams & Bernstein
P. O. Box 389
Raleigh, North Carolina 27602-0389

RE: Ilco-Unican v. Stewart-Warner

Dear Jay:

Please call me at your convenience to let us know what date you have selected for the depositions of Mr. Stewart and Mr. Moser.

Enclosed please find laboratory results from the roof dust samples collected and split with Mr. Nelson this past summer, which are forwarded to you pursuant to your earlier request.

Yours truly,

Keith H. Johnson

Keith H. Johnson

KHJ:msb
Enclosure



RESEARCH & ANALYTICAL LABORATORIES, INC.

REPORT #34

Analytical/Process Consultations

Ilco-Unican
2941 Indiana Ave.
Winston-Salem, NC 27105
Attn: Anthony Wilder

Date Sample Collected : 07/30/92
Date Sample Received : 07/31/92
Date Sample Analyzed : 08/01/92
Date of Report : 08/13/92

Analyses Performed by : MM -DW

Job Number : 00464 K

Lab Sample Number

141714

Parameter	Storet #	Results
Arsenic, TCLP		<0.10 MG/L
Barium, TCLP		0.680 MG/L
Cadmium, TCLP		<0.010 MG/L
Chromium, TCLP		<0.020 MG/L
Lead, TCLP		<0.10 MG/L
Mercury, TCLP		<0.0020 MG/L
Selenium, TCLP		<0.10 MG/L
Silver, TCLP		<0.010 MG/L
Sulfide	(00745)	(0.80 MG/KG
Cyanide	(00720)	9.50 MG/KG

Clients Sample Source/Number : -----
4BAGS OF G-3

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SOUTHPARK OFFICE
4201 CONGRESS ST, SUITE 145
CHARLOTTE, NORTH CAROLINA 28209
TELEPHONE: 704-556-9600
FACSIMILE: 704-556-9601

August 27, 1992

Susanna K. Gibbons, Esq.
Poyner & Spruill
3600 Glenwood Avenue
Post Office Box 10096
Raleigh, North Carolina 27605-0096

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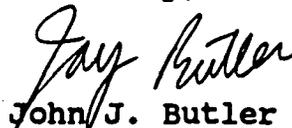
RE: Ilco-Unican Corporation v. Stewart-Warner Corporation,
Case No. 6:91-CV-00034

Dear Susie:

Enclosed is the report of the laboratory analysis on the roof dust sampled by Bain Palmer & Associates on July 30, 1992. These are samples taken from the area 3 dust which Ilco-Unican had characterized as hazardous based on a test that did not comply with all the procedures outlined in the code of federal regulations. The data from the enclosed laboratory analysis shows that the area 3 dust is not a hazardous waste. Therefore, Ilco-Unican can save itself the expense of disposing of this material as hazardous. Please send us a copy of the split sample results. Presumably, there will be no material differences.

Please call me if you have any questions.

Sincerely,


John J. Butler

JJB/cep

g:\. . .\jjb\lbr\gibbon32.ltr

August 19, 1992



Ms. Ellen Underkoffler
Bain, Palmer & Assoc., Inc.
2641 G Randleman Rd.
Greensboro, NC 27406

RE: PACE Project No. 620731.527
Client Reference: 11CO Unican-118.001

Dear Ms. Underkoffler:

Enclosed is the report of laboratory analyses for samples received July 31, 1992.

Footnotes are given at the end of the report.

If you have any questions concerning this report, please feel free to contact us.

Sincerely,

Shauna G. Jenkins
Shauna G. Jenkins
Project Manager

Enclosures

Bain, Palmer & Assoc., Inc.
 2641 G Randleman Rd.
 Greensboro, NC 27406

August 19, 1992
 PACE Project Number: 620731527

Attn: Ms. Ellen Underkoffler

Client Reference: 11C0 Unican-118.001

PACE Sample Number: 92 0090179
 Date Collected: 07/30/92
 Date Received: 07/31/92
 Client Sample ID: 0001

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Dust</u> <u>Leachate</u> <u>(1)</u>	<u>METHOD</u>	<u>DATE ANALYZED</u>
<u>INORGANIC ANALYSIS</u>					
RCRA TOXICITY METALS (TCLP)				1311	
Arsenic	mg/L	0.0050	ND		08/17/92
Barium	mg/L	0.010	0.442		08/14/92
Cadmium	mg/L	0.010	ND		08/14/92
Chromium	mg/L	0.010	0.010		08/14/92
Lead	mg/L	0.100	0.809		08/14/92
Mercury	mg/L	0.0002	0.0007		08/13/92
Selenium	mg/L	0.0050	ND		08/17/92
Silver	mg/L	0.010	ND		08/14/92

These data have been reviewed and are approved for release.



Charles M. Cabaniss
 Manager, Inorganic Chemistry

Ms. Ellen Underkoffler
Page 2

FOOTNOTES
for page 1

August 19, 1992
PACE Project Number: 620731527

Client Reference: 11CO Unican-118.001

MDL Method Detection Limit
ND Not detected at or above the MDL.
(1) All analysis performed on Toxic Characteristic Leachate.

Ms. Ellen Underkoffler
 Page 3

QUALITY CONTROL DATA

August 19, 1992
 PACE Project Number: 620731527

Client Reference: 11C0 Unican-118.001

Arsenic
 Batch: 92 13266
 Samples: 92 0090179

METHOD BLANK:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Method Blank</u>
Arsenic	mg/L	0.0050	ND

SPIKE:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>920090667 Spike</u>	<u>Spike Recv</u>
Arsenic	mg/L	0.0050	0.282	0.020 430%

LABORATORY CONTROL SAMPLE:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Reference Value</u>	<u>Recv</u>
Arsenic	mg/L	0.0050	0.052	92%

Ms. Ellen Underkoffler
Page 4

QUALITY CONTROL DATA

August 19, 1992
PACE Project Number: 620731527

Client Reference: 11CO Unican-118.001

Cadmium
Batch: 92 13228
Samples: 92 0090179

METHOD BLANK:

Parameter	Units	MDL	Method Blank
Nickel	mg/L	0.010	ND
Cadmium	mg/L	0.010	ND
Vanadium	mg/L	0.010	ND
Lead	mg/L	0.100	ND
Barium	mg/L	0.010	ND
Copper	mg/L	0.010	ND
Chromium	mg/L	0.010	ND
Beryllium	mg/L	0.010	ND
Zinc	mg/L	0.010	0.022
Cobalt	mg/L	0.010	ND
Iron	mg/L	0.010	0.025
Silver	mg/L	0.010	ND
Manganese	mg/L	0.010	ND
Aluminum	mg/L	0.010	0.023

SPIKE AND SPIKE DUPLICATE:

Parameter	Units	MDL	920086562	Spike	Spike Recv	Spike Dupl Recv	RPD
Nickel	mg/L	0.010	0.019	1.000	93%	103%	10%
Cadmium	mg/L	0.010	ND	1.000	89%	92%	3%
Vanadium	mg/L	0.010	ND	1.000	88%	91%	3%
Lead	mg/L	0.100	ND	1.000	97%	97%	0%
Barium	mg/L	0.010	0.012	1.000	75%	82%	8%
Copper	mg/L	0.010	0.129	1.000	83%	90%	8%
Chromium	mg/L	0.010	0.012	1.000	96%	96%	0%
Beryllium	mg/L	0.010	ND	1.000	87%	91%	4%
Zinc	mg/L	0.010	0.791	1.000	84%	88%	4%
Cobalt	mg/L	0.010	ND	1.000	88%	92%	4%
Iron	mg/L	0.010	0.931	1.000	82%	74%	10%
Silver	mg/L	0.010	ND				
Manganese	mg/L	0.010	0.048	1.000	85%	90%	5%

Ms. Ellen Underkoffler
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QUALITY CONTROL DATA

August 19, 1992
 PACE Project Number: 620731527

Client Reference: 11C0 Unican-118.001

Cadmium
 Batch: 92 13228
 Samples: 92 0090179

SPIKE AND SPIKE DUPLICATE:

Parameter	Units	MDL	920086562	Spike	Spike Recv	Spike Dupl Recv	RPD
Aluminum	mg/L	0.010	0.234	1.000	84%	95%	12%

LABORATORY CONTROL SAMPLE:

Parameter	Units	MDL	Reference Value	Recv
Nickel	mg/L	0.010	0.500	95%
Cadmium	mg/L	0.010	0.500	94%
Vanadium	mg/L	0.010	0.500	90%
Lead	mg/L	0.100	0.500	96%
Barium	mg/L	0.010	0.142	107%
Copper	mg/L	0.010	0.500	94%
Chromium	mg/L	0.010	0.500	93%
Beryllium	mg/L	0.010	0.500	93%
Zinc	mg/L	0.010	0.500	91%
Cobalt	mg/L	0.010	0.500	95%
Iron	mg/L	0.010	0.500	95%
Silver	mg/L	0.010	0.024	96%
Manganese	mg/L	0.010	0.500	93%
Aluminum	mg/L	0.010	0.500	94%

Ms. Ellen Underkoffler
Page 6

QUALITY CONTROL DATA

August 19, 1992
PACE Project Number: 620731527

Client Reference: 11CO Unican-118.001

Mercury
Batch: 92 13177
Samples: 92 0090179

METHOD BLANK AND SAMPLE DUPLICATE:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Method Blank</u>	<u>920088204</u>	<u>Duplicate of 92 0088204</u>	<u>RPD</u>
Mercury	mg/L	0.0002	ND	0.0036	0.0036	0%

SPIKE:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>920088204</u>	<u>Spike</u>	<u>Spike Recv</u>
Mercury	mg/L	0.0002	0.0036	0.0050	108%

LABORATORY CONTROL SAMPLE:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Reference Value</u>	<u>Recv</u>
Mercury	mg/L	0.0002	0.0030	100%

Ms. Ellen Underkoffler
 Page 7

QUALITY CONTROL DATA

August 19, 1992
 PACE Project Number: 620731527

Client Reference: 11C0 Unican-118.001

Selenium
 Batch: 92 13265
 Samples: 92 0090179

METHOD BLANK AND SAMPLE DUPLICATE:

Parameter	Units	MDL	Method Blank	920093992	Duplicate of 92 0093992	RPD
Selenium	mg/L	0.0050	ND	ND	ND	NC

SPIKE:

Parameter	Units	MDL	930052770	Spike	Spike Recv
Selenium	mg/L	0.0050	ND	0.010	77%

LABORATORY CONTROL SAMPLE:

Parameter	Units	MDL	Reference Value	Recv
Selenium	mg/L	0.0050	0.0081	96%

Ms. Ellen Underkoffler

FOOTNOTES

August 19, 1992

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for pages 3 through 7

PACE Project Number: 620731527

Client Reference: IICO Unican-118.001

MDL Method Detection Limit
NC No calculation due to value below detection limit.
ND Not detected at or above the MDL.
RPD Relative Percent Difference

FORSYTH COUNTY
ENVIRONMENTAL
AFFAIRS

SAN 5066
Source Barzil-Sack
Premise # 00436-0001 - Brass
SPECIAL ACTION RECOMMENDED (Yes 0002 - Zinc (No) _____)

I. GENERAL INFORMATION

A. Sources Inspected Brass melt Production Status Normal
furnace, paint spray booth, (production over
Zn remelt pots, loader for 2-3 years at
1/3 plant capacity

B. Reasons for Inspection (Check Appropriate Items)

Annual
Routine Inspection Compliance Progress _____
Complaint Investigation _____ Permit Review/Renewal _____
Stack Testing Observed _____ Tax Certification _____
Special Studies _____ Emergency Episode _____
Other _____ Equipment Malfunction _____

C. Plant Representative Contacted (Name and Title) I D Blakley

D. Inspection Procedures and Conditions

Prior Notice (Check One) Yes No
Time/Date 1-23-86 Duration On-Site 1 1/2 hours
Type Inspection (Check One) Level I _____ Level II Level III _____
Other _____
Weather 50% cloudy Wind Direction from NE

II. PRE-INSPECTION INTERVIEW

A. Production Status: Normal Abnormal _____
B. Control Equipment: Normal Abnormal _____
C. Permit/Compliance Schedule Changes Needed: Yes _____ No
D. Comments No VE's observed from any emission point

III. INSPECTION RESULTS

A. General Conclusions

All Sources in Compliance with:

Mass Emission Regulations:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Visible Emission Regulations:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Fuel Quality Regulations:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Continuous Monitoring Regulations:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Sampling/Testing Requirements:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Recordkeeping Requirements:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Permit Stipulations:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Special Orders:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

O&M Practices: Good Average Poor
 Housekeeping: Good Average Poor

B. Specific Conclusions

Compliance Questionable Due To:

Changes in Raw Materials and/or Fuels _____
 Production Rates Increases _____
 Operational Changes in Process _____
 Deterioration of Process Equipment _____

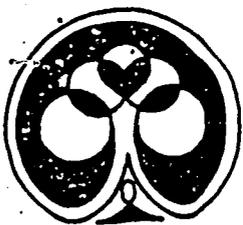
Operational Problems in Control Equipment (describe) None

C. Samples Taken (Describe) No

D. Comments/Recommended Action/Deviations from Application facility

operating @ 20 mils ore mass crucible
being used, 2 Zn melt pots being used,
electroplating, oxidizing, perques spray booth.
Overall production about 1/3 plant capacity
No metals observed.

Inspector Def Date 1-23-66



AIR SOURCE FIELD INSPECTION REPORT



FCEAD

For Office Use:

1. Source: <i>Barrick Sack</i>	2. Date: <i>1-23-86</i>	SAN <i>5066</i>
3. Investigator(s): <i>Rife</i>	4. NEOS#	
5. Source contact: <i>ID Blalley</i>	6. Quarterly Insp. <input type="checkbox"/>	Annual Insp. <input checked="" type="checkbox"/>
7. Emissions point inspected <i>2 Brass melt Furnace</i>	Complaint Insp. <input type="checkbox"/>	Announced Insp. <input checked="" type="checkbox"/>
8. Associated permit #'s <i>00436-0001</i>	Permit Insp. <input type="checkbox"/>	Unannounced Insp. <input type="checkbox"/>
9. Violating points: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
10. Visible emissions? If so, attach VEE form <i>0%</i>		
11. Emission point characteristics:		
<p><i>(2) Brass 70/30 melt crucible furnaces</i> <i>- Fuller Draco Bk #112 6120 ft²</i> <i>(a) Applicable regulations 1200 T/yr production</i></p>		
<p><i>(2) Zinc Lindberg Furnace</i> <i>No Fluxing</i> } <i>Not in use</i> <i>No controls</i></p> <p><i>(b) Associated test data</i></p>		
<p><i>vents internally?</i></p> <p><i>(c) Design efficiencies, same as PTC7</i></p>		
<p style="text-align: right;"><i>1001542</i></p>		

FORSYTH COUNTY ENVIRONMENTAL AFFAIRS DEPARTMENT

Plume Observation Record Form

Date 1-23-86

Source Basalt Suck

Observer K. R. [unclear]

Address Indian Ave

Checked by _____

Type of installation metal products

Fuel Nat gas Stack Ht. 45'

Observers Distance from Stack

90 Ft.

Wind Speed 5 Direct NE

Sky Condition 50% cloud

Plume Color No VES clear

Plume Background sky

Start Time 9:10

Ending Time 9:22

Ending Weather _____

Wind Speed _____ Direct _____

Sky Condition _____

AGGREGATE:

No. Units in Excess of Standard _____

5 min/hr. flow _____

No. Units of VIO. _____

Method 9:

6 min. Total _____

% Opacity (total ≥ 24) _____

REMARKS

No VES from

① Boiler

② Duffing cyclone

③ Electrostatic stack

④ 2n melt pot

⑤ Brass concrete

baghouse

Sec. Min.	0	15	30	45	Sec. Min.	0	15	30	45
0					30				
1					31				
2					32				
3					33				
4					34				
5					35				
6					36				
7					37				
8					38				
9					39				
10	0	0	0	0	40				
11	0	0	0	0	41				
12	0	0	0	0	42				
13	0	0	0	0	43				
14	0	0	0	0	44				
15	0	0	0	0	45				
16	0	0	0	0	46				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
23					53				
24					54				
25					55				
26					56				
27					57				
28					58				
29					59				

EPA U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM
Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response. With an average of 32 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Information Policy Branch (PM-223), US EPA, 401 M St. SW Washington, DC 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, DC 20803

EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (This space for your optional use)

FOR EPA USE ONLY POSTMARK DATE RECEIPT DATE ATTACHMENT PRESENT BATCH NUMBER

1.1 ARE YOU CLAIMING THE CHEMICAL IDENTITY ON PAGE 3 TRADE SECRET? 1.2 IF "YES" IN 1.1, IS THIS COPY: 1.3 REPORTING YEAR

CERTIFICATION (Read and sign after completing all sections.) I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

SIGNATURE DATE SIGNED

NAME OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL TITLE OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL

WHERE TO SEND COMPLETED FORMS. 1. EPCRA REPORTING CENTER ATTN: TOXIC CHEMICAL RELEASE INVENTORY P.O. BOX 23779 WASHINGTON, DC 20026-3779 2. APPROPRIATE STATE OFFICE (See Instructions in Appendix G)

3.1 FACILITY OR ESTABLISHMENT NAME

STREET NUMBER STREET NAME

CITY COUNTY STATE ZIP CODE

TRI FACILITY IDENTIFICATION NUMBER 3.2 THIS REPORT CONTAINS INFORMATION FOR (CHECK ONLY ONE)

3.3 TECHNICAL CONTACT TELEPHONE NUMBER (Include Area Code)

3.4 PUBLIC CONTACT TELEPHONE NUMBER (Include Area Code)

3.5 SIC CODE (4 DIGIT)

3.6 LATITUDE LONGITUDE

3.7 DUN AND BRADSTREET NUMBER(S) 3.8 EPA IDENTIFICATION NUMBER(S) (RCRA I.D. NO.)

3.9 NPDES PERMIT NUMBER(S) 3.11 UNDERGROUND INJECTION WELL CODE (UIC) I.D. NO.(s)

3.10 RECEIVING STREAMS OR WATER BODIES (ENTER ONE NAME PER BOX)

PARENT COMPANY INFORMATION

4.1 NAME OF PARENT COMPANY 4.2 PARENT COMPANY'S DUN AND BRADSTREET NUMBER

EPA EPA FORM R
 PART II. OFF-SITE LOCATIONS TO WHICH
 TOXIC CHEMICALS ARE TRANSFERRED
 IN WASTES

(This space for your optional use)

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW NAME

1. Archie Elledge Waste Treatment
 STREET NUMBER 2799 STREET NAME Griffith Road
 CITY Winston-Salem COUNTY Forsyth STATE NC ZIP CODE 27103

1.2 POTW NAME

1. _____
 STREET NUMBER _____ STREET NAME _____
 CITY _____ COUNTY _____ STATE _____ ZIP CODE _____

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 OFF-SITE LOCATION NAME

2. Cyano Kem, Inc.
 STREET NUMBER 12381 STREET NAME Schaefer Highway
 CITY Detroit COUNTY Wayne STATE MI ZIP CODE 48327
 EPA IDENTIFICATION NUMBER (RCRA ID. NO.) MID0 98011992
 IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.2 OFF-SITE LOCATION NAME

2. GSX Services
 STREET NUMBER _____ STREET NAME Route #1, Box 255
 CITY Pinewood COUNTY Sumter STATE SC ZIP CODE 29125
 EPA IDENTIFICATION NUMBER (RCRA ID. NO.) SCD0 70375985
 IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.3 OFF-SITE LOCATION NAME

2. Thermal Kem
 STREET NUMBER 2324 STREET NAME Vernsdale Road
 CITY Rock Hill COUNTY York STATE SC ZIP CODE 29730
 EPA IDENTIFICATION NUMBER (RCRA ID. NO.) SCD0 44442333
 IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.4 OFF-SITE LOCATION NAME

2. Advanced Environmental Technology Corporation (A.E.T.C.)
 STREET NUMBER _____ STREET NAME Eden Lane
 CITY Flanders COUNTY Morris STATE NC ZIP CODE 07836
 EPA IDENTIFICATION NUMBER (RCRA ID. NO.) NJD0 980536593
 IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

ARE ADDITIONAL PAGES OF PART II ATTACHED? YES NO HOW MANY? _____

1002514

EPA EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use)
Tetrachloroethylene
was no longer part of
our operation as of 12-31-89

1. CHEMICAL IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 2.)

1.1 (RESERVED)

1.2 CAS NUMBER (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)
000 127 184

1.3 CHEMICAL OR CHEMICAL CATEGORY NAME (Enter only one name exactly as it appears on the 313 list.)

Tetrachloroethylene (Perchloroethylene)

1.4 GENERIC CHEMICAL NAME (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

NA

2. MIXTURE COMPONENT IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 1.)

GENERIC CHEMICAL NAME PROVIDED BY SUPPLIER (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation))

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1 MANUFACTURE THE CHEMICAL:

a. Produce b. Import

IF PRODUCE OR IMPORT:

c. For on site use/processing d. For sale/distribution e. As a byproduct f. As an impurity

3.2 PROCESS THE CHEMICAL:

a. As a reactant b. As a formulation component c. As an article component d. Repackaging only

3.3 OTHERWISE USE THE CHEMICAL:

a. As a chemical processing aid b. As a manufacturing aid c. Ancillary or other use

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

(ENTER CODE)

03

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)		A. TOTAL RELEASE (POUNDS/YEAR)			B. BASIS OF ESTIMATE (ENTER CODE)	C. % FROM STORMWATER
		A. 1 REPORTING RANGES				
		0	1-499	500-999		
5.1 FUGITIVE OR NON-POINT AIR EMISSIONS	5.1a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9,000	5.1b <input type="checkbox"/> 0
5.2 STACK OR POINT AIR EMISSIONS	5.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	28,000	5.2b <input type="checkbox"/> C
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES (Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.1 <input type="checkbox"/>	5.3.1a	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.3.1b <input type="checkbox"/> 5.3.1c <input type="checkbox"/> NA %
	5.3.2 <input type="checkbox"/>	5.3.2a	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.3.2b <input type="checkbox"/> 5.3.2c <input type="checkbox"/> NA %
	5.3.3 <input type="checkbox"/>	5.3.3a	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.3.3b <input type="checkbox"/> 5.3.3c <input type="checkbox"/> NA %
5.4 UNDERGROUND INJECTION ON-SITE	5.4a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.4b <input type="checkbox"/>
5.5 RELEASES TO LAND ON-SITE						
5.5.1 LANDFILL	5.5.1a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.5.1b <input type="checkbox"/>
5.5.2 LAND TREATMENT/ APPLICATION FARMING	5.5.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.5.2b <input type="checkbox"/>
5.5.3 SURFACE IMPOUNDMENT	5.5.3a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.5.3b <input type="checkbox"/>
5.5.4 OTHER DISPOSAL	5.5.4a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	5.5.4b <input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

EPA PART III. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

(This space for your optional use)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL TRANSFERS (pounds/year)			B. BASIS OF ESTIMATE (enter code)	C. TYPE OF TREATMENT DISPOSAL (enter code)	
	A.1 REPORTING RANGES		A.2 ENTER ESTIMATE			
	0	1-499	500-999			
6.1.1 Discharge to POTW (enter location number from Part II, Section 1.) <input type="checkbox"/> 1 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	6.1.1b <input type="checkbox"/>	
6.2.1 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	750	6.2.1b <input type="checkbox"/> M	6.2.1c <input type="checkbox"/> M <input type="checkbox"/> 50
6.2.2 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	6.2.2b <input type="checkbox"/>	6.2.2c <input type="checkbox"/> M <input type="checkbox"/>
6.2.3 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	6.2.3b <input type="checkbox"/>	6.2.3c <input type="checkbox"/> M <input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. GENERAL WASTESTREAM (enter code)	B. TREATMENT METHOD (enter code)	C. RANGE OF INFLUENT CONCENTRATION (enter code)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7.1a <input type="checkbox"/>	7.1b <input type="checkbox"/>	7.1c <input type="checkbox"/>	7.1d <input type="checkbox"/>	7.1e <input type="checkbox"/> NA %	7.1f <input type="checkbox"/>	<input type="checkbox"/>
7.2a <input type="checkbox"/>	7.2b <input type="checkbox"/>	7.2c <input type="checkbox"/>	7.2d <input type="checkbox"/>	7.2e <input type="checkbox"/> NA %	7.2f <input type="checkbox"/>	<input type="checkbox"/>
7.3a <input type="checkbox"/>	7.3b <input type="checkbox"/>	7.3c <input type="checkbox"/>	7.3d <input type="checkbox"/>	7.3e <input type="checkbox"/> NA %	7.3f <input type="checkbox"/>	<input type="checkbox"/>
7.4a <input type="checkbox"/>	7.4b <input type="checkbox"/>	7.4c <input type="checkbox"/>	7.4d <input type="checkbox"/>	7.4e <input type="checkbox"/> NA %	7.4f <input type="checkbox"/>	<input type="checkbox"/>
7.5a <input type="checkbox"/>	7.5b <input type="checkbox"/>	7.5c <input type="checkbox"/>	7.5d <input type="checkbox"/>	7.5e <input type="checkbox"/> NA %	7.5f <input type="checkbox"/>	<input type="checkbox"/>
7.6a <input type="checkbox"/>	7.6b <input type="checkbox"/>	7.6c <input type="checkbox"/>	7.6d <input type="checkbox"/>	7.6e <input type="checkbox"/> NA %	7.6f <input type="checkbox"/>	<input type="checkbox"/>
7.7a <input type="checkbox"/>	7.7b <input type="checkbox"/>	7.7c <input type="checkbox"/>	7.7d <input type="checkbox"/>	7.7e <input type="checkbox"/> NA %	7.7f <input type="checkbox"/>	<input type="checkbox"/>
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d <input type="checkbox"/>	7.8e <input type="checkbox"/> NA %	7.8f <input type="checkbox"/>	<input type="checkbox"/>
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d <input type="checkbox"/>	7.9e <input type="checkbox"/> NA %	7.9f <input type="checkbox"/>	<input type="checkbox"/>
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d <input type="checkbox"/>	7.10e <input type="checkbox"/> NA %	7.10f <input type="checkbox"/>	<input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. TYPE OF MODIFICATION (enter code)	B. QUANTITY OF THE CHEMICAL IN WASTES PRIOR TO TREATMENT OR DISPOSAL			C. INDEX + -	D. REASON FOR ACTION (enter code)
	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))		
<input type="checkbox"/> M	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> + <input type="checkbox"/> - <input type="checkbox"/> %	<input type="checkbox"/>	<input type="checkbox"/> R



EPA FORM R PART IV. SUPPLEMENTAL INFORMATION

(This space for your optional use.)

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

ADDITIONAL INFORMATION ON RELEASE OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE (Part III. Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)	A. TOTAL RELEASE (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. % FROM STORMWATER
	A. 1 REPORTING RANGES 0 1-499 500-999		A. 2 ENTER ESTIMATE		
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/> 5.3. <input type="checkbox"/> c <input type="text"/> %
(Enter letter code for stream from Part I Section 3.10 in the shaded box provided.)	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/> 5.3. <input type="checkbox"/> c <input type="text"/> %

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS (Part III. Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)	A. TOTAL TRANSFERS (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. TYPE OF TREATMENT/ DISPOSAL (enter code in shaded box)
	A. 1 REPORTING RANGES 0 1-499 500-999		A. 2 ENTER ESTIMATE		
6.1. <input type="checkbox"/> Discharge to POTW (enter location number from Part II. Section 1.)	<input type="checkbox"/> 1 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.1. <input type="checkbox"/> b <input type="text"/>	
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II. Section 2.)	<input type="checkbox"/> 2 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="text"/>	6.2. <input type="checkbox"/> c M <input type="text"/>
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II. Section 2.)	<input type="checkbox"/> 2 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="text"/>	6.2. <input type="checkbox"/> c M <input type="text"/>
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II. Section 2.)	<input type="checkbox"/> 2 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="text"/>	6.2. <input type="checkbox"/> c M <input type="text"/>

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III. Section 7)

A. GENERAL WASTESTREAM (enter code in shaded box)	B. TREATMENT METHOD (enter code in shaded box)	C. RANGE OF CONCENTRATION (enter code in shaded box)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>

EPA U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response. With an average of 12 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Information Policy Branch (PM-223), US EPA, 401 M St. SW, Washington, DC 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, DC 20803

EPA FORM R	PART I. FACILITY IDENTIFICATION	(This space for your optional use)
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FOR EPA USE ONLY	POSTMARK DATE [][] [][] [][]	RECEIPT DATE [][] [][] [][]	ATTACHMENT PRESENT YES <input type="checkbox"/> NO <input type="checkbox"/>	BATCH NUMBER [][][][][][]
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1.1 ARE YOU CLAIMING THE CHEMICAL IDENTITY ON PAGE 3 TRADE SECRET? <input type="checkbox"/> YES (ANSWER QUESTION 1.2: ATTACH SUBSTANTIATION FORMS) <input checked="" type="checkbox"/> NO (DO NOT ANSWER 1.2: GO TO QUESTION 1.3.)	1.2 IF "YES" IN 1.1, IS THIS COPY: <input type="checkbox"/> SANITIZED <input type="checkbox"/> UNSANITIZED	1.3 REPORTING YEAR 19 <u>89</u>
--	--	---

CERTIFICATION (Read and sign after completing all sections.)
I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

SIGNATURE Lee J. Wilsman **DATE SIGNED** 1/26/89

NAME OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL
Lee J. Wilsman

TITLE OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL
V. P. Operations

WHERE TO SEND COMPLETED FORMS:
1. EPCRA REPORTING CENTER
ATTN. TOXIC CHEMICAL RELEASE INVENTORY
P.O. BOX 23779
WASHINGTON, DC 20026-3779
2. APPROPRIATE STATE OFFICE (See instructions in Appendix G)

3.1 FACILITY OR ESTABLISHMENT NAME
Ilco Unican Corporation, Capitol Division

STREET NUMBER 2941 **STREET NAME** Indiana Avenue

CITY Winston-Salem **COUNTY** Forsyth **STATE** NC **ZIP CODE** 27105

TRI FACILITY IDENTIFICATION NUMBER 27105 LCNCH 2941 I

3.2 THIS REPORT CONTAINS INFORMATION FOR (CHECK ONLY ONE)
A. AN ENTIRE FACILITY B. PART OF A FACILITY

3.3 TECHNICAL CONTACT Anthony V. Wilder **TELEPHONE NUMBER (Include Area Code)** 919-725-1331

3.4 PUBLIC CONTACT Hader Iskander **TELEPHONE NUMBER (Include Area Code)** 919-725-1331

3.5 SIC CODE (4 DIGIT)
a. 3429 b. NA c. NA d. NA e. NA f. NA

3.6 LATITUDE DEGREES 03 MINUTES 68 SECONDS 000 **LONGITUDE** DEGREES 08 MINUTES 13 SECONDS 300

3.7 DUN AND BRADSTREET NUMBER(S)
a. 04 790 7084 b.

3.8 EPA IDENTIFICATION NUMBER(S) (RCRA I.D. NO.)
a. NCDO 24895864 b.

3.9 NPDES PERMIT NUMBER(S)
a. NC0037834 b.

3.11 UNDERGROUND INJECTION WELL CODE (UIC) I.D. NO.(s)
a. b.

3.10 RECEIVING STREAMS OR WATER BODIES (ENTER ONE NAME PER BOX)
a.
b.
c.
d.
e.
f.

4 PARENT COMPANY INFORMATION

4.1 NAME OF PARENT COMPANY
Ilco Unican

4.2 PARENT COMPANY'S DUN AND BRADSTREET NUMBER
20 541 7592

EPA

EPA FORM R PART II. OFF-SITE LOCATIONS TO WHICH TOXIC CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use)

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW NAME

1. Archie Elledge Waste Treatment

STREET NUMBER
2799

STREET NAME
Griffith Road

CITY
Winston-Salem

COUNTY
Forsyth

STATE
NC

ZIP CODE
27103

1.2 POTW NAME

1.

STREET NUMBER

STREET NAME

CITY

COUNTY

STATE

ZIP CODE

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 OFF-SITE LOCATION NAME

2. Cyano Ken, Inc.

STREET NUMBER
12381

STREET NAME
Schaefer Highway

CITY
Detroit

COUNTY
Wayne

STATE
MI

ZIP CODE
48027

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
MID0 98011992

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.2 OFF-SITE LOCATION NAME

2. GSX Services

STREET NUMBER

STREET NAME
Route #1, Box 255

CITY
Pinewood

COUNTY
Sumter

STATE
SC

ZIP CODE
29125

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
SC00 70375985

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.3 OFF-SITE LOCATION NAME

2. Thermal Kem

STREET NUMBER
2324

STREET NAME
Vernsdale Road

CITY
Rock Hill

COUNTY
York

STATE
SC

ZIP CODE
29730

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
SC00 44442333

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.4 OFF-SITE LOCATION NAME

2. Advanced Environmental Technology Corporation (A.E.T.C.)

STREET NUMBER
1

STREET NAME
Eden Lane

CITY
Flanders

COUNTY
Morris

STATE
NC

ZIP CODE
07836

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
NJ00 980536593

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

ARE ADDITIONAL PAGES OF PART II ATTACHED? YES NO HOW MANY?

1002519

EPA EPA FORM R

PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use)

1. CHEMICAL IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 2.)

1.1 (RESERVED)

1.2 CAS NUMBER (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)

007782505

1.3 CHEMICAL OR CHEMICAL CATEGORY NAME (Enter only one name exactly as it appears on the 313 list.)

Chlorine

1.4 GENERIC CHEMICAL NAME (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

NA

2. MIXTURE COMPONENT IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 1.)

GENERIC CHEMICAL NAME PROVIDED BY SUPPLIER (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)

NA

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1 MANUFACTURE THE CHEMICAL:

IF PRODUCE OR IMPORT:

a. Produce b. Import c. For on site use/processing d. For sale/distribution e. As a byproduct f. As an impurity

3.2 PROCESS THE CHEMICAL:

a. As a reactant b. As a formulation component c. As an article component d. Repackaging only

3.3 OTHERWISE USE THE CHEMICAL:

a. As a chemical processing aid b. As a manufacturing aid c. Ancillary or other use

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

(ENTER CODE)

04

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)		A. TOTAL RELEASE (POUNDS/YEAR)			B. BASIS OF ESTIMATE (ENTER CODE)	C. % FROM STORMWATER
		A. 1 REPORTING RANGES		A. 2 ENTER ESTIMATE		
		0	1-499	500-999		
5.1 FUGITIVE OR NON-POINT AIR EMISSIONS	5.1a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5.1b <input type="checkbox"/>	
5.2 STACK OR POINT AIR EMISSIONS	5.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.2b <input type="checkbox"/>	
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES (Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.1b <input type="checkbox"/>	5.3.1c <input type="checkbox"/> %
	5.3.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.2b <input type="checkbox"/>	5.3.2c <input type="checkbox"/> %
	5.3.3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.3b <input type="checkbox"/>	5.3.3c <input type="checkbox"/> %
5.4 UNDERGROUND INJECTION ON-SITE	5.4a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.4b <input type="checkbox"/>	
5.5 RELEASES TO LAND ON-SITE	5.5.1 LANDFILL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.1b <input type="checkbox"/>	
	5.5.2 LAND TREATMENT/ APPLICATION FARMING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.2b <input type="checkbox"/>	
	5.5.3 SURFACE IMPOUNDMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.3b <input type="checkbox"/>	
	5.5.4 OTHER DISPOSAL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.4b <input type="checkbox"/>	

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

EPA PART III. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

(This space for your optional use)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2.)	A. TOTAL TRANSFERS (pounds/year)			B. BASIS OF ESTIMATE (enter code)	C. TYPE OF TREATMENT/DISPOSAL (enter code)
	A.1 REPORTING RANGES	A.2 ENTER ESTIMATE			
	0	1-499	500-999		
6.1.1 Discharge to POTW (enter location number from Part II, Section 1.) <input type="checkbox"/> 1 . <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.1.1b <input type="checkbox"/>	
6.2.1 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.1b <input type="checkbox"/>	6.2.1c <input type="checkbox"/> M <input type="checkbox"/>
6.2.2 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.2b <input type="checkbox"/>	6.2.2c <input type="checkbox"/> M <input type="checkbox"/>
6.2.3 Other off-site location (enter location number from Part II, Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.3b <input type="checkbox"/>	6.2.3c <input type="checkbox"/> M <input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. GENERAL WASTESTREAM (enter code)	B. TREATMENT METHOD (enter code)	C. RANGE OF INFLUENT CONCENTRATION (enter code)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7.1a <input type="checkbox"/> W	7.1b <input type="checkbox"/> C41	7.1c <input type="checkbox"/> 3	7.1d <input checked="" type="checkbox"/>	7.1e <input type="checkbox"/> 99 + %	7.1f <input type="checkbox"/>	<input checked="" type="checkbox"/>
7.2a <input type="checkbox"/> W	7.2b <input type="checkbox"/> P09	7.2c <input type="checkbox"/>	7.2d <input checked="" type="checkbox"/>	7.2e <input type="checkbox"/> 0 %	7.2f <input type="checkbox"/>	<input type="checkbox"/>
7.3a <input type="checkbox"/> W	7.3b <input type="checkbox"/> C01	7.3c <input type="checkbox"/>	7.3d <input checked="" type="checkbox"/>	7.3e <input type="checkbox"/> 0 %	7.3f <input type="checkbox"/>	<input type="checkbox"/>
7.4a <input type="checkbox"/> W	7.4b <input type="checkbox"/> P11	7.4c <input type="checkbox"/>	7.4d <input checked="" type="checkbox"/>	7.4e <input type="checkbox"/> 0 %	7.4f <input type="checkbox"/>	<input type="checkbox"/>
7.5a <input type="checkbox"/> W	7.5b <input type="checkbox"/> P12	7.5c <input type="checkbox"/>	7.5d <input checked="" type="checkbox"/>	7.5e <input type="checkbox"/> 0 %	7.5f <input type="checkbox"/>	<input type="checkbox"/>
7.6a <input type="checkbox"/> W	7.6b <input type="checkbox"/> P13	7.6c <input type="checkbox"/>	7.6d <input checked="" type="checkbox"/>	7.6e <input type="checkbox"/> 0 %	7.6f <input type="checkbox"/>	<input type="checkbox"/>
7.7a <input type="checkbox"/> W	7.7b <input type="checkbox"/> P99	7.7c <input type="checkbox"/>	7.7d <input checked="" type="checkbox"/>	7.7e <input type="checkbox"/> 0 %	7.7f <input type="checkbox"/>	<input type="checkbox"/>
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d <input type="checkbox"/>	7.8e <input type="checkbox"/> NA %	7.8f <input type="checkbox"/>	<input type="checkbox"/>
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d <input type="checkbox"/>	7.9e <input type="checkbox"/> NA %	7.9f <input type="checkbox"/>	<input type="checkbox"/>
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d <input type="checkbox"/>	7.10e <input type="checkbox"/> NA %	7.10f <input type="checkbox"/>	<input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. TYPE OF MODIFICATION	B. QUANTITY OF THE CHEMICAL IN WASTES PRIOR TO TREATMENT OR DISPOSAL			C. INDEX	D. REASON FOR ACTION
(enter code) <input type="checkbox"/> M <input type="checkbox"/>	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))	<input type="checkbox"/> + <input type="checkbox"/> -	(enter code) <input type="checkbox"/> R <input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> + <input type="checkbox"/> - <input type="checkbox"/> %	<input type="checkbox"/>	



EPA FORM R
PART IV. SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

(This space for your optional use)

ADDITIONAL INFORMATION ON RELEASE OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE
(Part III, Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL RELEASE (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. % FROM STORMWATER
	A.1 REPORTING RANGES 0 1-499 500-999	A.2 ENTER ESTIMATE			
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/>	5.3. <input type="checkbox"/> c <input type="checkbox"/>
(Enter letter code for stream from Part I Section 3.10 in the shaded box provided.)	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/>	5.3. <input type="checkbox"/> c <input type="checkbox"/>

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS
(Part III, Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL TRANSFERS (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. TYPE OF TREATMENT/DISPOSAL (enter code in shaded box)
	A.1 REPORTING RANGES 0 1-499 500-999	A.2 ENTER ESTIMATE			
6.1. <input type="checkbox"/> Discharge to POTW (enter location number from Part II, Section 1.)	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.1. <input type="checkbox"/> b <input type="checkbox"/>	
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M <input type="checkbox"/>
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M <input type="checkbox"/>
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M <input type="checkbox"/>

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY
(Part III, Section 7)

A. GENERAL WASTESTREAM (enter code in shaded box)	B. TREATMENT METHOD (enter code in shaded box)	C. RANGE OF CONCENTRATION (enter code in shaded box)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>

EPA U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response. With an average of 12 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Information Policy Branch (PM-223), US EPA, 401 M St. SW Washington, DC 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, DC 20803

EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (This space for your optional use)

FOR EPA USE ONLY POSTMARK DATE RECEIPT DATE ATTACHMENT PRESENT BATCH NUMBER

1.1 ARE YOU CLAIMING THE CHEMICAL IDENTITY ON PAGE 3 TRADE SECRET? 1.2 IF "YES" IN 1.1, IS THIS COPY: 1.3 REPORTING YEAR

CERTIFICATION (Read and sign after completing all sections.) I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report

2 SIGNATURE DATE SIGNED

NAME OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL TITLE OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL

WHERE TO SEND COMPLETED FORMS 1. EPCRA REPORTING CENTER ATTN: TOXIC CHEMICAL RELEASE INVENTORY P.O. BOX 23779 WASHINGTON, DC 20026-3779 2. APPROPRIATE STATE OFFICE (See Instructions in Appendix G)

3.1 FACILITY OR ESTABLISHMENT NAME

STREET NUMBER STREET NAME

CITY COUNTY STATE ZIP CODE

3.2 THIS REPORT CONTAINS INFORMATION FOR (CHECK ONLY ONE) A. AN ENTIRE FACILITY B. PART OF A FACILITY

3.3 TECHNICAL CONTACT TELEPHONE NUMBER (Include Area Code)

3.4 PUBLIC CONTACT TELEPHONE NUMBER (Include Area Code)

3.5 SIC CODE (4 DIGIT)

3.6 LATITUDE LONGITUDE

3.7 DUN AND BRADSTREET NUMBER(S) 3.8 EPA IDENTIFICATION NUMBER(S) (RCRA I.D. NO.)

3.9 NPDES PERMIT NUMBER(S) 3.11 UNDERGROUND INJECTION WELL CODE (UIC) I.D. NO.(s)

3.10 RECEIVING STREAMS OR WATER BODIES (ENTER ONE NAME PER BOX)

4 PARENT COMPANY INFORMATION

4.1 NAME OF PARENT COMPANY 4.2 PARENT COMPANY'S DUN AND BRADSTREET NUMBER

EPA

EPA FORM R PART II. OFF-SITE LOCATIONS TO WHICH TOXIC CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use)

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW NAME

1. Archie Elledge Waste Treatment

STREET NUMBER
 2799

STREET NAME
 Griffith Road

CITY
 Winston-Salem

COUNTY
 Forsyth

STATE
 NC

ZIP CODE
 27103

1.2 POTW NAME

1.

STREET NUMBER

STREET NAME

CITY

COUNTY

STATE

ZIP CODE

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 OFF-SITE LOCATION NAME

2. Cyano Kem, Inc.

STREET NUMBER
 12381

STREET NAME
 Schaefer Highway

CITY
 Detroit

COUNTY
 Wayne

STATE
 MI

ZIP CODE
 48827

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
 NID0 98011992

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY? YES NO

2.2 OFF-SITE LOCATION NAME

2. GSX Services

STREET NUMBER

STREET NAME
 Route #1, Box 255

CITY
 Pinewood

COUNTY
 Sumter

STATE
 SC

ZIP CODE
 29125

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
 SCDO 70375985

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY? YES NO

2.3 OFF-SITE LOCATION NAME

2. Thermal Kem

STREET NUMBER
 2324

STREET NAME
 Vernsdale Road

CITY
 Rock Hill

COUNTY
 York

STATE
 SC

ZIP CODE
 29730

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
 SCDO 44442333

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY? YES NO

2.4 OFF-SITE LOCATION NAME

2. Advanced Environmental Technology Corporation (A.E.T.C.)

STREET NUMBER
 1

STREET NAME
 Eden Lane

CITY
 Flanders

COUNTY
 Morris

STATE
 NC

ZIP CODE
 07836

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
 NJD 980536593

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY? YES NO

ARE ADDITIONAL PAGES OF PART II ATTACHED?

YES

NO

HOW MANY?

100252d

EPA EPA FORM R PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use)

1. CHEMICAL IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 2.)

1.1 (RESERVED) 1.2 CAS NUMBER (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)

1.3 CHEMICAL OR CHEMICAL CATEGORY NAME (Enter only one name exactly as it appears on the 313 list.)

1.4 GENERIC CHEMICAL NAME (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

2. MIXTURE COMPONENT IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 1.)

GENERIC CHEMICAL NAME PROVIDED BY SUPPLIER (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation))

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1 MANUFACTURE THE CHEMICAL: IF PRODUCE OR IMPORT:

a. Produce b. Import c. For on site use/processing d. For sale/distribution e. As a byproduct f. As an impurity

3.2 PROCESS THE CHEMICAL:

a. As a reactant b. As a formulation component c. As an article component d. Repackaging only

3.3 OTHERWISE USE THE CHEMICAL:

a. As a chemical processing aid b. As a manufacturing aid c. Ancillary or other use

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

(ENTER CODE)

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)		A. TOTAL RELEASE (POUNDS/YEAR)			B. BASIS OF ESTIMATE (ENTER CODE)	C. % FROM STORMWATER
		A.1 REPORTING RANGES		A.2 ENTER ESTIMATE		
		0	1-499	500-999		
5.1 FUGITIVE OR NON-POINT AIR EMISSIONS	5.1a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5.1b <input type="text" value="0"/>	
5.2 STACK OR POINT AIR EMISSIONS	5.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.2b <input type="text" value="NA"/>	
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES <small>(Enter letter code for stream from Part I Section 3.10 in the box provided.)</small>	5.3.1 <input type="checkbox"/>	5.3.1a <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.1b <input type="text" value="NA"/>	5.3.1c <input type="text" value="NA"/> %
	5.3.2 <input type="checkbox"/>	5.3.2a <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.2b <input type="text" value="NA"/>	5.3.2c <input type="text" value="NA"/> %
	5.3.3 <input type="checkbox"/>	5.3.3a <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.3b <input type="text" value="NA"/>	5.3.3c <input type="text" value="NA"/> %
5.4 UNDERGROUND INJECTION ON-SITE	5.4a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.4b <input type="text" value="NA"/>	
5.5 RELEASES TO LAND ON-SITE	5.5.1 LANDFILL	5.5.1a	<input type="checkbox"/>	<input type="checkbox"/>	5.5.1b <input type="text" value="NA"/>	
	5.5.2 LAND TREATMENT/ APPLICATION FARMING	5.5.2a	<input type="checkbox"/>	<input type="checkbox"/>	5.5.2b <input type="text" value="NA"/>	
	5.5.3 SURFACE IMPOUNDMENT	5.5.3a	<input type="checkbox"/>	<input type="checkbox"/>	5.5.3b <input type="text" value="NA"/>	
	5.5.4 OTHER DISPOSAL	5.5.4a	<input type="checkbox"/>	<input type="checkbox"/>	5.5.4b <input type="text" value="NA"/>	

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

EPA PART III. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

(This space for your optional use)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)	A. TOTAL TRANSFERS (pounds/year)			B. BASIS OF ESTIMATE (enter code)	C. TYPE OF TREATMENT/ DISPOSAL (enter code)
	A. 1 REPORTING RANGES		A. 2 ENTER ESTIMATE		
	0	1-499	500-999		
6.1.1 Discharge to POTW (enter location number from Part II. Section 1.) <input type="checkbox"/> 1 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.1.1b <input type="checkbox"/> NA	
6.2.1 Other off-site location (enter location number from Part II. Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.1b <input type="checkbox"/> NA	6.2.1c <input type="checkbox"/> M <input type="checkbox"/>
6.2.2 Other off-site location (enter location number from Part II. Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.2b <input type="checkbox"/> NA	6.2.2c <input type="checkbox"/> M <input type="checkbox"/>
6.2.3 Other off-site location (enter location number from Part II. Section 2.) <input type="checkbox"/> 2 . <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.3b <input type="checkbox"/> NA	6.2.3c <input type="checkbox"/> M <input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. GENERAL WASTESTREAM (enter code)	B. TREATMENT METHOD (enter code)	C. RANGE OF INFLUENT CONCENTRATION (enter code)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7.1a <input type="checkbox"/> W	7.1b <input type="checkbox"/> C41	7.1c <input type="checkbox"/> 3	7.1d <input checked="" type="checkbox"/> X	7.1e <input type="checkbox"/> %	7.1f <input type="checkbox"/>	<input type="checkbox"/>
7.2a <input type="checkbox"/> W	7.2b <input type="checkbox"/> P09	7.2c <input type="checkbox"/>	7.2d <input checked="" type="checkbox"/> X	7.2e <input type="checkbox"/> %	7.2f <input type="checkbox"/>	<input type="checkbox"/>
7.3a <input type="checkbox"/> W	7.3b <input type="checkbox"/> C01	7.3c <input type="checkbox"/>	7.3d <input checked="" type="checkbox"/> X	7.3e <input type="checkbox"/> %	7.3f <input type="checkbox"/>	<input type="checkbox"/>
7.4a <input type="checkbox"/> W	7.4b <input type="checkbox"/> P11	7.4c <input type="checkbox"/>	7.4d <input checked="" type="checkbox"/> X	7.4e <input type="checkbox"/> %	7.4f <input type="checkbox"/>	<input type="checkbox"/>
7.5a <input type="checkbox"/> W	7.5b <input type="checkbox"/> PT2	7.5c <input type="checkbox"/>	7.5d <input checked="" type="checkbox"/> X	7.5e <input type="checkbox"/> %	7.5f <input type="checkbox"/>	<input type="checkbox"/>
7.6a <input type="checkbox"/> W	7.6b <input type="checkbox"/> PT3	7.6c <input type="checkbox"/>	7.6d <input checked="" type="checkbox"/> X	7.6e <input type="checkbox"/> %	7.6f <input type="checkbox"/>	<input type="checkbox"/>
7.7a <input type="checkbox"/> W	7.7b <input type="checkbox"/> P99	7.7c <input type="checkbox"/>	7.7d <input checked="" type="checkbox"/> X	7.7e <input type="checkbox"/> 100 %	7.7f <input type="checkbox"/>	<input checked="" type="checkbox"/> X
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d <input type="checkbox"/>	7.8e <input type="checkbox"/> %	7.8f <input type="checkbox"/>	<input type="checkbox"/>
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d <input type="checkbox"/>	7.9e <input type="checkbox"/> %	7.9f <input type="checkbox"/>	<input type="checkbox"/>
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d <input type="checkbox"/>	7.10e <input type="checkbox"/> %	7.10f <input type="checkbox"/>	<input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. TYPE OF MODIFICATION (enter code)	B. QUANTITY OF THE CHEMICAL IN WASTES PRIOR TO TREATMENT OR DISPOSAL			C. INDEX + -	D. REASON FOR ACTION (enter code)
	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))		
<input type="checkbox"/> M	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> + <input type="checkbox"/> 2 <input type="checkbox"/> %	<input type="checkbox"/>	<input type="checkbox"/> R



EPA FORM R

PART IV. SUPPLEMENTAL INFORMATION

(This space for your optional use)

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

ADDITIONAL INFORMATION ON RELEASE OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE (Part III, Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL RELEASE (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. % FROM STORMWATER
	A.1 REPORTING RANGES 0 1-499 500-999		A.2 ENTER ESTIMATE		
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/> 5.3. <input type="checkbox"/> c <input type="checkbox"/>
(Enter letter code for stream from Part I Section 3.10 in the shaded box provided.)	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/> 5.3. <input type="checkbox"/> c <input type="checkbox"/>

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS (Part III, Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL TRANSFERS (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. TYPE OF TREATMENT/DISPOSAL (enter code in shaded box)
	A.1 REPORTING RANGES 0 1-499 500-999		A.2 ENTER ESTIMATE		
6.1. <input type="checkbox"/> Discharge to POTW (enter location number from Part II, Section 1.)	<input type="checkbox"/> 1 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.1. <input type="checkbox"/> b <input type="checkbox"/>	
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. GENERAL WASTESTREAM (enter code in shaded box)	B. TREATMENT METHOD (enter code in shaded box)	C. RANGE OF CONCENTRATION (enter code in shaded box)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d <input type="checkbox"/>	7. <input type="checkbox"/> e <input type="checkbox"/> %	7. <input type="checkbox"/> f. <input type="checkbox"/>	<input type="checkbox"/>

1002527

EPA U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response. With an average of 12 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Information Policy Branch (PM-223), US EPA, 401 M St. SW, Washington, DC 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, DC 20503

EPA FORM R

PART I. FACILITY IDENTIFICATION INFORMATION

(This space for your optional use)

FOR EPA USE ONLY

POSTMARK DATE

RECEIPT DATE

ATTACHMENT PRESENT YES NO

BATCH NUMBER

1.1 ARE YOU CLAIMING THE CHEMICAL IDENTITY ON PAGE 3 TRADE SECRET? YES NO

1.2 IF "YES" IN 1.1, IS THIS COPY: SANITIZED UNSANITIZED

1.3 REPORTING YEAR 19 89

CERTIFICATION (Read and sign after completing all sections.) I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report

SIGNATURE Lee J. Wilsman

DATE SIGNED 1/26/89

NAME OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL Lee J. Wilsman TITLE OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL V. P. Operations

WHERE TO SEND COMPLETED FORMS 1. EPCRA REPORTING CENTER ATTN: TOXIC CHEMICAL RELEASE INVENTORY P.O. BOX 23779 WASHINGTON, DC 20026-3779 2. APPROPRIATE STATE OFFICE (See instructions in Appendix G)

3.1 FACILITY OR ESTABLISHMENT NAME Ilco Unican Corporation, Capitol Division

STREET NUMBER 2941 STREET NAME Indiana Avenue

CITY Winston-Salem COUNTY Forsyth STATE NC ZIP CODE 27105

TRI FACILITY IDENTIFICATION NUMBER 27105 LCNCN 2941 I 3.2 THIS REPORT CONTAINS INFORMATION FOR (CHECK ONLY ONE) A. AN ENTIRE FACILITY B. PART OF A FACILITY

3.3 TECHNICAL CONTACT Anthony V. Wilder TELEPHONE NUMBER (Include Area Code) 919-725-1331

3.4 PUBLIC CONTACT Nader Iskander TELEPHONE NUMBER (Include Area Code) 919-725-1331

3.5 SIC CODE (4 DIGIT) a. 3429 b. NA c. NA d. NA e. NA f. NA

3.6 LATITUDE DEGREES 03 MINUTES 68 SECONDS 000 LONGITUDE DEGREES 08 MINUTES 13 SECONDS 300

3.7 DUN AND BRADSTREET NUMBER(S) a. 04 790 7034 b. 3.8 EPA IDENTIFICATION NUMBER(S) (RCRA I.D. NO.) a. NCDO 24895864 b.

3.9 NPDES PERMIT NUMBER(S) a. NC0037834 b. 3.11 UNDERGROUND INJECTION WELL CODE (UIC) I.D. NO.(s) a. b.

3.10 RECEIVING STREAMS OR WATER BODIES (ENTER ONE NAME PER BOX) a. b. c. d. e. f.

PARENT COMPANY INFORMATION

4.1 NAME OF PARENT COMPANY Ilco Unican

4.2 PARENT COMPANY'S DUN AND BRADSTREET NUMBER 20 541 4592

3 FACILITY IDENTIFICATION

4

EPA EPA FORM R

PART II. OFF-SITE LOCATIONS TO WHICH TOXIC CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use)

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW NAME

1. Archie Elledge Waste Treatment

STREET NUMBER
2799

STREET NAME
Griffith Road

CITY
Winston-Salem

COUNTY
Forsyth

STATE
NC

ZIP CODE
27103

1.2 POTW NAME

1.

STREET NUMBER

STREET NAME

CITY

COUNTY

STATE

ZIP CODE

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 OFF-SITE LOCATION NAME

2. Cyano Kem, Inc.

STREET NUMBER
12381

STREET NAME
Schaefer Highway

CITY
Detroit

COUNTY
Wayne

STATE
MI

ZIP CODE
48827

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
MIDO 98011992

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.2 OFF-SITE LOCATION NAME

2. GSX Services

STREET NUMBER

STREET NAME
Route #1, Box 255

CITY
Pinewood

COUNTY
Sumter

STATE
SC

ZIP CODE
29125

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
SCDO 70375985

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.3 OFF-SITE LOCATION NAME

2. Thermal Kem

STREET NUMBER
2324

STREET NAME
Vernsdale Road

CITY
Rock Hill

COUNTY
York

STATE
SC

ZIP CODE
29730

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
SCD04442333

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

2.4 OFF-SITE LOCATION NAME

2. Advanced Environmental Technology Corporation (A.E.T.C.)

STREET NUMBER

STREET NAME
Eden Lane

CITY
Flanders

COUNTY
Morris

STATE
NC

ZIP CODE
07836

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)
HJD 980536593

IS LOCATION UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY? YES NO

ARE ADDITIONAL PAGES OF PART II ATTACHED? YES NO HOW MANY?

EPA EPA FORM R PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use)

1. CHEMICAL IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 2.)

1.1 (RESERVED)

1.2 CAS NUMBER (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)
007 664 939

1.3 CHEMICAL OR CHEMICAL CATEGORY NAME (Enter only one name exactly as it appears on the 313 list.)

Sulfuric Acid

1.4 GENERIC CHEMICAL NAME (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

NA

2. MIXTURE COMPONENT IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 1.)

GENERIC CHEMICAL NAME PROVIDED BY SUPPLIER (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)

NA

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1 MANUFACTURE THE CHEMICAL:

IF PRODUCE OR IMPORT:

a. Produce b. Import c. For on site use/processing d. For sale/distribution e. As a byproduct f. As an impurity

3.2 PROCESS THE CHEMICAL:

a. As a reactant b. As a formulation component c. As an article component d. Repackaging only

3.3 OTHERWISE USE THE CHEMICAL:

a. As a chemical processing aid b. As a manufacturing aid c. Ancillary or other use

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

(ENTER CODE)

03

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)	A. TOTAL RELEASE (POUNDS/YEAR)			B. BASIS OF ESTIMATE (ENTER CODE)	C. % FROM STORMWATER	
	A. 1 REPORTING RANGES 0 1-499 500-999	A. 2 ENTER ESTIMATE				
5.1 FUGITIVE OR NON-POINT AIR EMISSIONS	5.1a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5.1b <input type="checkbox"/>	
5.2 STACK OR POINT AIR EMISSIONS	5.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.2b <input type="checkbox"/>	
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES (Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.1 <input type="checkbox"/>	5.3.1a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.1c <input type="checkbox"/> %
	5.3.2 <input type="checkbox"/>	5.3.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.2c <input type="checkbox"/> %
	5.3.3 <input type="checkbox"/>	5.3.3a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.3.3c <input type="checkbox"/> %
5.4 UNDERGROUND INJECTION ON-SITE	5.4a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.4b <input type="checkbox"/>	
5.5 RELEASES TO LAND ON-SITE						
5.5.1 LANDFILL	5.5.1a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.1b <input type="checkbox"/>	
5.5.2 LAND TREATMENT/ APPLICATION FARMING	5.5.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.2b <input type="checkbox"/>	
5.5.3 SURFACE IMPOUNDMENT	5.5.3a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.3b <input type="checkbox"/>	
5.5.4 OTHER DISPOSAL	5.5.4a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.5.4b <input type="checkbox"/>	

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

EPA PART III. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

(This space for your optional use)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL TRANSFERS (pounds/year)					B. BASIS OF ESTIMATE (enter code)	C. TYPE OF TREATMENT DISPOSAL (enter code)
	A.1 REPORTING RANGES			A.2 ENTER ESTIMATE			
	0	1-499	500-999				
6.1.1 Discharge to POTW (enter location number from Part II, Section 1.)	<input type="checkbox"/> 1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.1.1b <input type="checkbox"/>	
6.2.1 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.1b <input type="checkbox"/>	6.2.1c <input type="checkbox"/> M
6.2.2 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.2b <input type="checkbox"/>	6.2.2c <input type="checkbox"/> M
6.2.3 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.2.3b <input type="checkbox"/>	6.2.3c <input type="checkbox"/> M

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. GENERAL WASTESTREAM (enter code)	B. TREATMENT METHOD (enter code)	C. RANGE OF INFLUENT CONCENTRATION (enter code)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7.1a <input type="checkbox"/> W	7.1b <input type="checkbox"/> C2T	7.1c <input type="checkbox"/> 3	7.1d <input checked="" type="checkbox"/> X	7.1e <input type="checkbox"/> 99 %	7.1f <input checked="" type="checkbox"/> X	<input type="checkbox"/>
7.2a <input type="checkbox"/> W	7.2b <input type="checkbox"/> P09	7.2c <input type="checkbox"/>	7.2d <input checked="" type="checkbox"/> X	7.2e <input type="checkbox"/> 7 %	7.2f <input type="checkbox"/>	<input type="checkbox"/>
7.3a <input type="checkbox"/> W	7.3b <input type="checkbox"/> C01	7.3c <input type="checkbox"/>	7.3d <input checked="" type="checkbox"/> X	7.3e <input type="checkbox"/> 0 %	7.3f <input type="checkbox"/>	<input type="checkbox"/>
7.4a <input type="checkbox"/> W	7.4b <input type="checkbox"/> P11	7.4c <input type="checkbox"/>	7.4d <input checked="" type="checkbox"/> X	7.4e <input type="checkbox"/> 11 %	7.4f <input type="checkbox"/>	<input type="checkbox"/>
7.5a <input type="checkbox"/> W	7.5b <input type="checkbox"/> P12	7.5c <input type="checkbox"/>	7.5d <input checked="" type="checkbox"/> X	7.5e <input type="checkbox"/> 0 %	7.5f <input type="checkbox"/>	<input type="checkbox"/>
7.6a <input type="checkbox"/> W	7.6b <input type="checkbox"/> P13	7.6c <input type="checkbox"/>	7.6d <input checked="" type="checkbox"/> X	7.6e <input type="checkbox"/> 7 %	7.6f <input type="checkbox"/>	<input type="checkbox"/>
7.7a <input type="checkbox"/> W	7.7b <input type="checkbox"/> P99	7.7c <input type="checkbox"/>	7.7d <input checked="" type="checkbox"/> X	7.7e <input type="checkbox"/> 0 %	7.7f <input type="checkbox"/>	<input type="checkbox"/>
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d <input type="checkbox"/>	7.8e <input type="checkbox"/> NA %	7.8f <input type="checkbox"/>	<input type="checkbox"/>
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d <input type="checkbox"/>	7.9e <input type="checkbox"/> NA %	7.9f <input type="checkbox"/>	<input type="checkbox"/>
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d <input type="checkbox"/>	7.10e <input type="checkbox"/> NA %	7.10f <input type="checkbox"/>	<input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. TYPE OF MODIFICATION (enter code)	B. QUANTITY OF THE CHEMICAL IN WASTES PRIOR TO TREATMENT OR DISPOSAL			C. INDEX + -	D. REASON FOR ACTION (enter code)
	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))		
<input type="checkbox"/> M	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> + <input type="checkbox"/> %	<input type="checkbox"/>	<input type="checkbox"/> R



EPA FORM R PART IV. SUPPLEMENTAL INFORMATION

(This space for your optional use.)

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

ADDITIONAL INFORMATION ON RELEASE OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE (Part III, Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL RELEASE (pounds/year)				B. BASIS OF ESTIMATE (enter code in shaded box)	C. % FROM STORMWATER
	A.1 REPORTING RANGES			A.2 ENTER ESTIMATE		
	0	1-499	500-999			
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/>	5.3. <input type="checkbox"/> c <input type="text"/>
	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/>	5.3. <input type="checkbox"/> c <input type="text"/>
(Enter letter code for stream from Part I Section 3.10 in the shaded box provided.)	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/>	5.3. <input type="checkbox"/> c <input type="text"/>

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS (Part III, Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL TRANSFERS (pounds/year)				B. BASIS OF ESTIMATE (enter code in shaded box)	C. TYPE OF TREATMENT/ DISPOSAL (enter code in shaded box)
	A.1 REPORTING RANGES			A.2 ENTER ESTIMATE		
	0	1-499	500-999			
6.1. <input type="checkbox"/> Discharge to POTW (enter location number from Part II, Section 1.)	<input type="checkbox"/> 1	<input type="text"/>	<input type="text"/>	<input type="text"/>	6.1. <input type="checkbox"/> b <input type="checkbox"/>	
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="text"/>	<input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M <input type="checkbox"/>
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="text"/>	<input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M <input type="checkbox"/>
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="text"/>	<input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="checkbox"/> M <input type="checkbox"/>

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. GENERAL WASTESTREAM (enter code in shaded box)	B. TREATMENT METHOD (enter code in shaded box)	C. RANGE OF CONCENTRATION (enter code in shaded box)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>

EPA U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response. With an average of 33 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Chief, Information Policy Branch (PM-223), US EPA, 401 M St., SW, Washington, DC 20460. Also, TRB Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, DC 20403.

EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (This space for your optional use)

FOR EPA USE ONLY POSTMARK DATE RECEIPT DATE ATTACHMENT PRESENT BATCH NUMBER

1.1 ARE YOU CLAIMING THE CHEMICAL IDENTITY ON PAGE 3 TRADE SECRET? 1.2 IF "YES" IN 1.1, IS THIS COPY: 1.3 REPORTING YEAR

CERTIFICATION (Read and sign after completing all sections.) I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

SIGNATURE DATE SIGNED

NAME OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL Lee J. Wilsman TITLE OF OWNER/OPERATOR OR SENIOR MANAGEMENT OFFICIAL V.P. Operations

WHERE TO SEND COMPLETED FORMS 1. EPCRA REPORTING CENTER ATTN: TOXIC CHEMICAL RELEASE INVENTORY P.O. BOX 23779 WASHINGTON, DC 20026 3779 2. APPROPRIATE STATE OFFICE (See instructions in Appendix G)

3.1 FACILITY OR ESTABLISHMENT NAME Ilco Unican Corporation, Capitol Division

STREET NUMBER 2941 STREET NAME Indiana Avenue

CITY Winston-Salem COUNTY Forsyth STATE NC ZIP CODE 27105

TRI FACILITY IDENTIFICATION NUMBER 27105 LCRCN 2941 I 3.2 THIS REPORT CONTAINS INFORMATION FOR (CHECK ONLY ONE) A. [X] AN ENTIRE FACILITY B. [] PART OF A FACILITY

3.3 TECHNICAL CONTACT Anthony V. Winder TELEPHONE NUMBER (Include Area Code) 919-725-1331

3.4 PUBLIC CONTACT Wader Iskander TELEPHONE NUMBER (Include Area Code) 919-725-1331

3.5 SIC CODE (4 DIGIT) a. 3729 b. c. d. e. f.

3.6 LATITUDE DEGREES 03 MINUTES 68 SECONDS 000 LONGITUDE DEGREES 08 MINUTES 13 SECONDS 300

3.7 DUN AND BRADSTREET NUMBER(S) a. 047907084 b. 3.8 EPA IDENTIFICATION NUMBER(S) (RCRA I.D. NO.) a. NCDO 24895864 b.

3.9 NPDES PERMIT NUMBER(S) a. NC0037834 b. 3.11 UNDERGROUND INJECTION WELL CODE (UIC) I.D. NO.(s) a. b.

3.10 RECEIVING STREAMS OR WATER BODIES (ENTER ONE NAME PER BOX) a. b. c. d. e. f.

4 PARENT COMPANY INFORMATION 4.1 NAME OF PARENT COMPANY Ilco Unican 4.2 PARENT COMPANY'S DUN AND BRADSTREET NUMBER 20 541 4592

EPA

EPA FORM R PART II. OFF-SITE LOCATIONS TO WHICH TOXIC CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use)

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW NAME

1. Archie Elledge Waste Treatment

STREET NUMBER

2799

STREET NAME

Griffith Road

CITY

Winston-Salem

COUNTY

Forsyth

STATE

NC

ZIP CODE

27103

1.2 POTW NAME

1.

STREET NUMBER

STREET NAME

CITY

COUNTY

STATE

ZIP CODE

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 OFF-SITE LOCATION NAME

2. Cyano Kem, Inc.

STREET NUMBER

12381

STREET NAME

Schaefer Highway

CITY

Detroit

COUNTY

Wayne

STATE

MI

ZIP CODE

48027

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)

MI00 98011992

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY?

YES NO

2.2 OFF-SITE LOCATION NAME

2. GSX Services

STREET NUMBER

STREET NAME

Route #1, Box 255

CITY

Pinewood

COUNTY

Sumter

STATE

SC

ZIP CODE

29125

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)

SC00 70375985

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY?

YES NO

2.3 OFF-SITE LOCATION NAME

2. Thermal Kem

STREET NUMBER

2324

STREET NAME

Vernsdale Road

CITY

Rock Hill

COUNTY

York

STATE

SC

ZIP CODE

29730

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)

SC00 44442333

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY?

YES NO

2.4 OFF-SITE LOCATION NAME

2. Advanced Environmental Technology Corporation (A.E.T.C.)

STREET NUMBER

1

STREET NAME

Eden Lane

CITY

Flanders

COUNTY

Morris

STATE

NC

ZIP CODE

07836

EPA IDENTIFICATION NUMBER (RCRA ID. NO.)

NJD 980536593

IS LOCATION UNDER CONTROL
OF REPORTING FACILITY
OR PARENT COMPANY?

YES NO

ARE ADDITIONAL PAGES OF PART II ATTACHED?

YES

NO

HOW MANY?

1002534

EPA EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use)

1. CHEMICAL IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 2.)

1.1 (RESERVED)

1.2 CAS NUMBER

(Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)

1.3 CHEMICAL OR CHEMICAL CATEGORY NAME (Enter only one name exactly as it appears on the 313 list.)

Cyanide Compound

1.4 GENERIC CHEMICAL NAME (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

NA

2. MIXTURE COMPONENT IDENTITY (DO NOT COMPLETE THIS SECTION IF YOU COMPLETE SECTION 1.)

GENERIC CHEMICAL NAME PROVIDED BY SUPPLIER (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)

NA

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1 MANUFACTURE THE CHEMICAL:

IF PRODUCE OR IMPORT:

a. Produce

b. Import

c. For on site use/processing

d. For sale/distribution

e. As a byproduct

f. As an impurity

3.2 PROCESS THE CHEMICAL:

a. As a reactant

b. As a formulation component

c. As an article component

d. Repackaging only

3.3 OTHERWISE USE THE CHEMICAL:

a. As a chemical processing aid

b. As a manufacturing aid

c. Ancillary or other use

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

(ENTER CODE)

03

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)		A. TOTAL RELEASE (POUNDS/YEAR)			B. BASIS OF ESTIMATE (ENTER CODE)	C. % FROM STORMWATER
		A. 1 REPORTING RANGES		A. 2 ENTER ESTIMATE		
		0	1-499	500-999		
5.1 FUGITIVE OR NON-POINT AIR EMISSIONS	5.1a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5.1b	<input type="checkbox"/> 0
5.2 STACK OR POINT AIR EMISSIONS	5.2a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.2b	<input type="checkbox"/> NA
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES (Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.1 <input type="checkbox"/>	5.3.1a	<input type="checkbox"/>	<input type="checkbox"/>	5.3.1b	5.3.1c <input type="checkbox"/> NA %
	5.3.2 <input type="checkbox"/>	5.3.2a	<input type="checkbox"/>	<input type="checkbox"/>	5.3.2b	5.3.2c <input type="checkbox"/> NA %
	5.3.3 <input type="checkbox"/>	5.3.3a	<input type="checkbox"/>	<input type="checkbox"/>	5.3.3b	5.3.3c <input type="checkbox"/> NA %
5.4 UNDERGROUND INJECTION ON-SITE	5.4a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.4b	<input type="checkbox"/> NA
5.5 RELEASES TO LAND ON-SITE	5.5.1 LANDFILL	5.5.1a	<input type="checkbox"/> D99	<input checked="" type="checkbox"/>	5.5.1b	<input type="checkbox"/>
	5.5.2 LAND TREATMENT/ APPLICATION FARMING	5.5.2a	<input type="checkbox"/>	<input type="checkbox"/>	5.5.2b	<input type="checkbox"/> NA
	5.5.3 SURFACE IMPOUNDMENT	5.5.3a	<input type="checkbox"/>	<input type="checkbox"/>	5.5.3b	<input type="checkbox"/> NA
	5.5.4 OTHER DISPOSAL	5.5.4a	<input type="checkbox"/>	<input type="checkbox"/>	5.5.4b	<input type="checkbox"/> NA

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

EPA PART III. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

(This space for your optional use)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A. 1. (Do not use both A. 1 and A. 2)	A. TOTAL TRANSFERS (pounds/year)				B. BASIS OF ESTIMATE (enter code)	C. TYPE OF TREATMENT/ DISPOSAL (enter code)
	A.1 REPORTING RANGES			A.2 ENTER ESTIMATE		
	0	1-499	500-999			
6.1.1 Discharge to POTW (enter location number from Part II, Section 1.)	<input type="checkbox"/> 1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	50	6.1.1b <input type="checkbox"/> M <input type="checkbox"/>
6.2.1 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="checkbox"/> 1	<input type="checkbox"/> X	<input type="checkbox"/>		6.2.1b <input type="checkbox"/> M <input type="checkbox"/> 72
6.2.2 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/>	26400	6.2.2b <input type="checkbox"/> M <input type="checkbox"/> 64
6.2.3 Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	6.2.3b <input type="checkbox"/> M <input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. GENERAL WASTESTREAM (enter code)	B. TREATMENT METHOD (enter code)	C. RANGE OF INFLUENT CONCENTRATION (enter code)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA? YES NO
7.1a <input type="checkbox"/> W	7.1b <input type="checkbox"/> C71	7.1c <input type="checkbox"/> 3	7.1d <input type="checkbox"/> X	7.1e <input type="checkbox"/> 99 %	7.1f <input type="checkbox"/> X <input type="checkbox"/>
7.2a <input type="checkbox"/> W	7.2b <input type="checkbox"/> P09	7.2c <input type="checkbox"/>	7.2d <input type="checkbox"/> X	7.2e <input type="checkbox"/> 0 %	7.2f <input type="checkbox"/> <input type="checkbox"/>
7.3a <input type="checkbox"/> W	7.3b <input type="checkbox"/> C01	7.3c <input type="checkbox"/>	7.3d <input type="checkbox"/> X	7.3e <input type="checkbox"/> 0 %	7.3f <input type="checkbox"/> <input type="checkbox"/>
7.4a <input type="checkbox"/> W	7.4b <input type="checkbox"/> P11	7.4c <input type="checkbox"/>	7.4d <input type="checkbox"/> X	7.4e <input type="checkbox"/> 0 %	7.4f <input type="checkbox"/> <input type="checkbox"/>
7.5a <input type="checkbox"/> W	7.5b <input type="checkbox"/> P12	7.5c <input type="checkbox"/>	7.5d <input type="checkbox"/> X	7.5e <input type="checkbox"/> 0 %	7.5f <input type="checkbox"/> <input type="checkbox"/>
7.6a <input type="checkbox"/> W	7.6b <input type="checkbox"/> P13	7.6c <input type="checkbox"/>	7.6d <input type="checkbox"/> X	7.6e <input type="checkbox"/> 0 %	7.6f <input type="checkbox"/> <input type="checkbox"/>
7.7a <input type="checkbox"/> W	7.7b <input type="checkbox"/> P99	7.7c <input type="checkbox"/>	7.7d <input type="checkbox"/> X	7.7e <input type="checkbox"/> 0 %	7.7f <input type="checkbox"/> <input type="checkbox"/>
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d <input type="checkbox"/>	7.8e <input type="checkbox"/> NA %	7.8f <input type="checkbox"/> <input type="checkbox"/>
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d <input type="checkbox"/>	7.9e <input type="checkbox"/> NA %	7.9f <input type="checkbox"/> <input type="checkbox"/>
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d <input type="checkbox"/>	7.10e <input type="checkbox"/> NA %	7.10f <input type="checkbox"/> <input type="checkbox"/>

(CHECK IF ADDITIONAL INFORMATION IS PROVIDED ON PART IV-SUPPLEMENTAL INFORMATION.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. TYPE OF MODIFICATION (enter code)	B. QUANTITY OF THE CHEMICAL IN WASTES PRIOR TO TREATMENT OR DISPOSAL			C. INDEX + -	D. REASON FOR ACTION (enter code)
	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))		
<input type="checkbox"/> M	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> + <input type="checkbox"/> - <input type="checkbox"/> %	<input type="checkbox"/> . <input type="checkbox"/>	<input type="checkbox"/> R <input type="checkbox"/>

EPA

EPA FORM R
PART IV. SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

(This space for your optional use)

ADDITIONAL INFORMATION ON RELEASE OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE
(Part III, Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL RELEASE (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. % FROM STORMWATER	
	A.1 REPORTING RANGES					A.2 ENTER ESTIMATE
	0	1-499	500-999			
5.3 DISCHARGES TO RECEIVING STREAMS OR WATER BODIES	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/> 5.3. <input type="checkbox"/> c <input type="text"/> %	
(Enter letter code for stream from Part I Section 3.10 in the shaded box provided.)	5.3. <input type="checkbox"/> <input type="checkbox"/>	5.3. <input type="checkbox"/> a	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	5.3. <input type="checkbox"/> b <input type="checkbox"/> 5.3. <input type="checkbox"/> c <input type="text"/> %	

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS
(Part III, Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. TOTAL TRANSFERS (pounds/year)			B. BASIS OF ESTIMATE (enter code in shaded box)	C. TYPE OF TREATMENT/ DISPOSAL (enter code in shaded box)	
	A.1 REPORTING RANGES					A.2 ENTER ESTIMATE
	0	1-499	500-999			
6.1. <input type="checkbox"/> Discharge to POTW (enter location number from Part II, Section 1.)	<input type="checkbox"/> 1 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.1. <input type="checkbox"/> b <input type="checkbox"/>		
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="text"/> M <input type="text"/>	
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="text"/> M <input type="text"/>	
6.2. <input type="checkbox"/> Other off-site location (enter location number from Part II, Section 2.)	<input type="checkbox"/> 2 . <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/>	6.2. <input type="checkbox"/> b <input type="checkbox"/>	6.2. <input type="checkbox"/> c <input type="text"/> M <input type="text"/>	

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY
(Part III, Section 7)

A. GENERAL WASTESTREAM (enter code in shaded box)	B. TREATMENT METHOD (enter code in shaded box)	C. RANGE OF CONCENTRATION (enter code in shaded box)	D. SEQUENTIAL TREATMENT? (check if applicable)	E. TREATMENT EFFICIENCY ESTIMATE	F. BASED ON OPERATING DATA?	
					YES	NO
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
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7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="text"/>	7. <input type="checkbox"/> c <input type="text"/>	7. <input type="checkbox"/> d <input type="text"/>	7. <input type="checkbox"/> e <input type="text"/> %	7. <input type="checkbox"/> f. <input type="text"/>	<input type="checkbox"/>

✓ Forsyth County, NC

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY Specific Information by Chemical	Facility Identification Name <u>Ilco Unican Corporation</u> Street Address <u>2941 Indiana Avenue</u> City <u>Winston-Salem, NC</u> Zip <u>27105</u>		Owner/Operator Name Name <u>Lee J. Wilsman</u> Phone <u>(919) 725-1331</u> Mail Address <u>2941 Indiana Avenue, Winston-Salem, NC 27105</u>	
	SIC Code <u>3429</u> Dun & Brad Number <u>04-790-7084</u>		Emergency Contact Name <u>Nader Iskander</u> Title <u>Fin. and Process Mgr.</u> Phone <u>(919) 725-1331</u> 24 Hr. Phone <u>(919) 744-7249</u>	
	FOR OFFICIAL USE ONLY ID: <u>NC-4135-89</u> Date Received <u>3/30/90</u>		Name <u>Anthony V. Wilder</u> Title <u>Plant Chemist</u> Phone <u>(919) 725-1331</u> 24 Hr. Phone <u>(919) 764-3717</u>	

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 19 89

Chemical Description	Physical and Health Hazards <small>(check all that apply)</small>	Inventory			Storage Codes and Locations <small>(Non-Confidential)</small>																
		Max. Daily Amount <small>(code)</small>	Avg. Daily Amount <small>(code)</small>	No. of Days On-site <small>(days)</small>	Storage Code	Storage Locations															
CAS <u>001310732</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Sodium Hydroxide (Solution)</u> Check all that apply: <input type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input type="checkbox"/> Delayed (chronic)	<u>02</u>	<u>02</u>	<u>365</u>	<table border="1" style="width:100%; height: 100px;"> <tr><td style="text-align: center;">A</td><td style="text-align: center;">1</td><td style="text-align: center;">4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>	A	1	4													1. Waste Treatment N See Site Plan
A	1	4																			
CAS <u>007440666</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Zinc</u> Check all that apply: <input checked="" type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input type="checkbox"/> Delayed (chronic)	<u>04</u>	<u>02</u>	<u>365</u>	<table border="1" style="width:100%; height: 100px;"> <tr><td style="text-align: center;">R</td><td style="text-align: center;">1</td><td style="text-align: center;">4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>	R	1	4													1. Die Cast, East 2. Receiving SW See Site Plan
R	1	4																			
CAS <u>007429905</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Aluminum</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	800070			<table border="1" style="width:100%; height: 100px;"> <tr><td style="text-align: center;">R</td><td style="text-align: center;">1</td><td style="text-align: center;">4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>	R	1	4													1. Die Cast East 2. Receiving SW See Site Plan
R	1	4																			

EXHIBIT
14

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Anthony V. Wilder Anthony V. Wilder 3/26/90
 Name and Title of owner/operator OR owner/operator's authorized representative Signature Date signed

Optional Attachments (Check one)

I have attached a site plan
 I have attached a list of site alterations

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY <i>Specific Information by Chemical</i>	Facility Identification Name <u>Ilco Unican Corporation</u> Street Address <u>2941 Indiana Avenue</u> City <u>Winston-Salem, NC</u> State <u>NC</u> Zip <u>27105</u>		Owner/Operator Name Name <u>Lee J. Wilsman</u> Phone <u>(919) 725-1331</u> Mail Address <u>2941 Indiana Avenue, Winston-Salem, NC 27105</u>	
	SIC Code <u>3429</u> Dun & Brad Number <u>04-790-7084</u>		Emergency Contact Name <u>Nader Iskander</u> Title <u>Fin. and Process Mgr.</u> Phone <u>(919) 725-1331</u> 24 Hr. Phone <u>(919) 744-7249</u>	
	FOR OFFICIAL USE ONLY ID # _____ Date Received <u>3/30/90</u>		Name <u>Anthony V. Wilder</u> Title <u>Plant Chemist</u> Phone <u>(919) 725-1331</u> 24 Hr. Phone <u>(919) 764-3717</u>	

Important: Read all instructions before completing form

Reporting Period: From January 1 to December 31, 19 89

Chemical Description	Physical and Health Hazards <small>(check all that apply)</small>	Inventory			Storage Codes and Locations <small>(Non-Confidential)</small>																
		Max. Daily Amount <small>(code)</small>	Avg. Daily Amount <small>(code)</small>	No. of Days On-site <small>(days)</small>	Storage Code	Storage Locations															
CAS <u>007782505</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Chlorine</u> Check all that apply: <input checked="" type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input checked="" type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>07</u>	<u>02</u>	<u>365</u>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td style="width:5%;">6</td><td style="width:5%;">2</td><td style="width:5%;">4</td></tr> <tr><td>6</td><td>2</td><td>4</td></tr> <tr><td>6</td><td>2</td><td>4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>	6	2	4	6	2	4	6	2	4							1. <u>Waste Treatment</u> 2. <u>Outside Waste Treatment</u> 3. <u>Outside Storage NW corner of bldg.</u>
6	2	4																			
6	2	4																			
6	2	4																			
CAS <u>007440020</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Nickel</u> Check all that apply: <input checked="" type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>02</u>	<u>02</u>	<u>365</u>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td style="width:5%;">0</td><td style="width:5%;">1</td><td style="width:5%;">4</td></tr> <tr><td>I</td><td>1</td><td>4</td></tr> <tr><td>I</td><td>1</td><td>4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>	0	1	4	I	1	4	I	1	4							1. <u>Barrel Plating</u> 2. <u>Rack Plating</u> 3. <u>Receiving</u> <u>See Site Plan</u>
0	1	4																			
I	1	4																			
I	1	4																			
CAS <u>007697372</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Nitric Acid</u> Check all that apply: <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>02</u>	<u>01</u>	<u>365</u>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td style="width:5%;">0</td><td style="width:5%;">1</td><td style="width:5%;">4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>	0	1	4													<u>Outside Lacquer House</u> <u>See Site Plan</u> <u>800071</u>
0	1	4																			

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

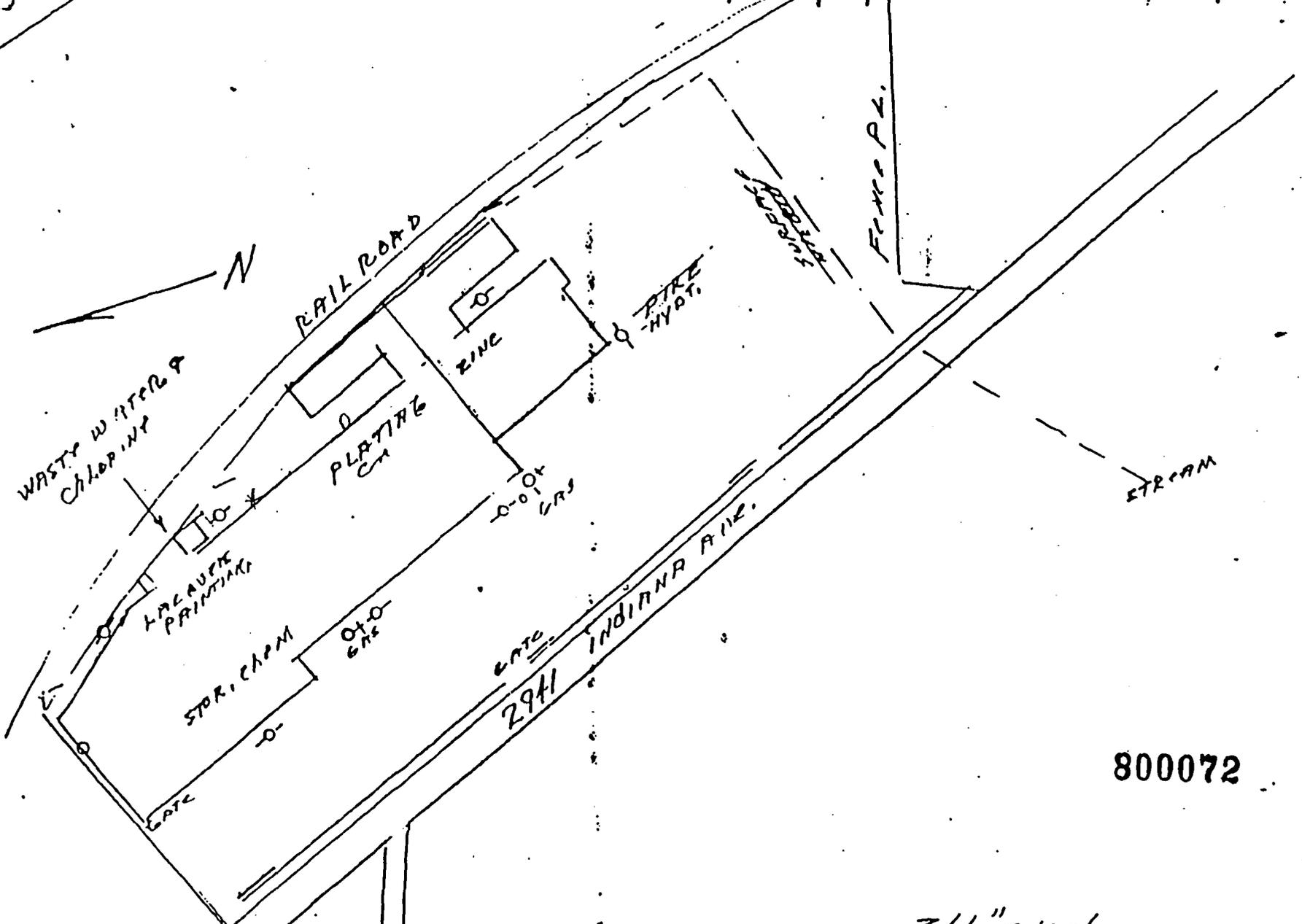
Name Anthony V. Wilder at title of owner/operator OR owner/operator's authorized representative
 Signature Anthony V. Wilder Date signed 3/26/90

Optional Attachments (Check one)

I have attached a site plan
 I have attached a list of site conditions and deviations

Highway
62

CHANGE BY	DESCRIPTION	DATE
-----------	-------------	------



800072

3/4" = 100'

65 SQ. K. TWO .272 DIA. HOLES P-.093 DIA. HOLE X SQ. HOLE OFF CENTER .

A-.172 DIA. B-.272 DIA. C-FLATTED RD..272 X.235 (HORIZ) D-FLT RD (VERT)

ITEM	REQ'D	DESCRIPTION	NUMBER
01		TOL DIV.	
		MAT'L THICK PRO CHECK	
		STD. SHANK-B	
		STD. STD.-1/4 DIA.	
		TOLERANCES	
		BOOKS & SEE	
		ITEM FACILITY SKETCH	
		ENG. NO.	
		DATE	

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES
DIVISION OF SOLID WASTE MANAGEMENT

1989 HAZARDOUS WASTE ANNUAL REPORT
(Generators & On-Site TSD Facilities)

I. FACILITY INFORMATION:

Facility Name: Ilco Unican Corporation Facility SIC Code: 3499
Facility EPA ID Number: NCD024895864

Location of Facility: 2941 Indiana Avenue
Winston-Salem, Forsyth, North Carolina 27105
(City or Town) (County) (State) (Zip Code)

Facility Contact: Anthony V. Wilder (919) 725-1331
(Name) (Area Code) (Phone Number)

List EPA ID Number for each Transporter used during reporting year: SCD036275626

PADO 09232745 NJD 991291584 MODO 95038998 SCD 981932601 ALO 981023492 SCD0 737092
NJDO 54126164

II. QUANTITY VERIFICATION:

The weights reported for each waste stream were determined from:

- (a) actual weight
 (b) gallons times the weight of water (8.34 pounds per gallon)
 (c) gallons times the weight of the material per gallon
 (d) other, specify _____

Estimated percentage of error in method used to determine weight: 3 %

Waste identification was determined from:

- (a) Knowledge of product/raw materials
 (b) Sampling results
 (c) Other, specify _____

III. CERTIFICATION:

I certify a program is in place to reduce the volume and toxicity of hazardous waste generated to the degree that is economically practicable, and the proposed method of treatment, storage or disposal is that practicable method currently available which minimized the present and future threat to human health and the environment.

-AND-

I certify, under penalty of law that I have personally examined and am familiar with the information submitted in this report and attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(Signature)

Anthony V. Wilder
(Print or Type Name)

(Date Signed)

2000527

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES
DIVISION OF SOLID WASTE MANAGEMENT

2000528

1989 HAZARDOUS WASTE ANNUAL REPORT
(Generators & On-Site TSD Facilities)

Facility EPA ID Number: NCDO 24895864

Waste Identification					On-Site Waste Management		Off-Site Waste Management			Waste Minimization	
EPA Waste No.	Waste Form Code	Waste Source Code	Quantity Generated On-Site (LBS)	Quantity Stored** Treated/Recovered or Disposed On-Site (LBS)	On-Site Handling Code	Off-Site Handling Code	Quantity Shipped Off-Site (LBS)	Receiving Facility EPA ID Number	Production Index	Activity Code	
1	F003	B209	A21	3,200			R01	3,200	FIA980729610	NA	W02
2	F005	B211	A21	2,400			R01	2,400	SCD036275626	NA	W02
3	F007	B107	A22	10,000			T04	10,000	MID098011992	NA	W52
4	D003	B312	A22	600			T04	600	MID098011992	NA	W52
5	F009	B105	A22	2,400			T04	2,400	MID098011992	NA	NA
6	F006	B306	A22	7,800			R01	7,800	PA981038227	NA	W02
7	F006	B306	A22	41,460			R01	41,460	SCD070375985	NA	W02
8	D008	B404	A22	800			T03	800	SCD044442333	NA	NA
9	D000	B001	A22	420			T03	420	SCD044442333	NA	W21
10											

For additional waste streams complete the "Continuation Sheet"

** As of December 31, 1989

NOTE: Read Instructions before completing form

1) FACILITY INFORMATION

Ico Union Capital Division
5941 Indiana Ave.
Winston-Salem, N.C.
NCN 02489 5864

2) FACILITY CONTACT

Anthony Wilder

3) SURVEY PARTICIPANTS

Anthony Wilder, Steve Hubbs
Nader Iskander, Jeff Rodgers

4) DATE OF INSPECTION

February 5, 1990

5) PURPOSE OF SURVEY

RCRA generator inspection in accordance with 40 CFR
Part 260, Generator Standards

6) FACILITY DESCRIPTION

Ico Union manufactures metal pull handles and fastening equipment for the furniture industry. In April or May 1990, Ico will convert from the furniture hardware to security systems (locks). The hazardous wastes generated at this plant consist of:

- 1) Electropolishing sludge (1,000) - generated from the wastewater pretreatment system. After filtration through a sludge filter press and a sludge drying system. This material is transported to United Resource Inc. in Foltoville, Tenn. by B.E.S. Environmental Services for metal recovery/reclamation.
- 2) Cyanide coils and solutions used on F207/F208 material. Material sent to the cleaning 1804397

2) Station tanks; Material transported by Tristate Motor Transit to Cyanokem Inc. (MID0920112) for Chemical treatment

3) Lead bearing dust - generated from the buffing or cleaning of parts. This material also goes to Cyanokem by transporter, Tristate Motor Transit.

4) 1,1,1 Trichloroethane - went to Southeastern Chemical in Sumter, S.C. This material is no longer generated at Leo Union.

5) Waste paint and lacquer thinner goes to Southeastern Chemical in Sumter, S.C. for a fuel blending program.

6) Various lab pack waste materials transported to Cyanokem by E.S.C. in South Carolina. Some lab packs have been transported by A.E.T.C. to Thermal Kern in Rock Hill, S.C.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION
CIVIL ACTION NUMBER: 6:91-CV-00034

ILCO-UNICAN CORPORATION,)
a North Carolina corporation,)

Plaintiff,)

v.)

STEWART-WARNER CORPORATION,)
a Virginia corporation, and)
STEWART-WARNER BASSICK-SACK)
CORPORATION, a Delaware)
corporation,)

Defendants.)

DECLARATION OF
GARY D. BABB

Gary D. Babb declares as follows:

1. I am a Vice President of Environmental Investigations located in Durham, North Carolina. In 1987 and 1988 I was the head of the Hazardous Waste Compliance Unit in the Solid and Hazardous Waste Management Section of the North Carolina Department of Human Resources. In that capacity, I was involved in assessing, directly or through my field operations supervisor R. Douglas Holyfield, remedial actions undertaken by Stewart-Warner Corporation in Winston-Salem.

2. The letter attached hereto as Exhibit A is a true and accurate copy of a letter dated February 11, 1988 from Mr. Brad A. DeVore and received by me on or about February 15, 1988. To the best of my recollection, the letter accurately reflects a conversation that I had with Mr. DeVore on or about February 10, 1988.

3. The document attached hereto as Exhibit B is a true and accurate copy of a letter dated July 6, 1988 from Mr. Brad A. DeVore and received by me on or about July 7, 1988. To the best of my recollection, the letter accurately reflects a conversation that I had with Mr. DeVore on or about July 6, 1988.

4. The document attached hereto as Exhibit C is a true and accurate copy of a letter dated July 14, 1988 from Mr. Brad A. DeVore and received by me on or about July 15, 1988. To the best of my recollection, the letter accurately reflects a conversation I had with Mr. DeVore on or about July 13, 1988.

5. The document attached hereto as Exhibit D is a true and accurate copy of a letter dated September 5, 1988 from Mr. Brad A. DeVore with attachments to Mr. R. Douglas Holyfield a copy of which, with enclosures, I received on or about September 8, 1988.

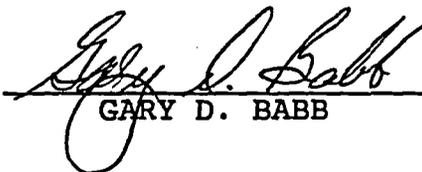
6. The document attached hereto as Exhibit E is a true and accurate copy of a letter dated November 16, 1988 from Mr. R. Douglas Holyfield and sent with my approval to Mr. Brad A. DeVore.

7. Based on my review of the plans and correspondence submitted by Stewart-Warner and discussions with my staff at the time, I believed and continue to believe, that Stewart-Warner satisfactorily fulfilled its obligations with respect to the cleanup of the spill sites and pit areas referred to in the attached documents. At the time Stewart-Warner undertook the cleanup of the spill sites and its cleanup of the pit areas, the Hazardous Waste Compliance Unit of the Solid and Hazardous Waste Management Section of the North Carolina Department of Human

Resources was the appropriate lead agency to supervise those cleanup actions.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

This the 20th day of April, 1992.


GARY D. BABB

WOMBLE CARLYLE SANDRIDGE & RICE

1600 ONE TRIAD PARK
AND

2400 WACHOVIA BUILDING
WINSTON-SALEM, NORTH CAROLINA 27101



CHARLOTTE OFFICE
2290 CHARLOTTE PLAZA
CHARLOTTE, NORTH CAROLINA 28244
TELEPHONE (704) 331-4900
TELECOPY (704) 334-6914
TELEX 853609

MAILING ADDRESS
POST OFFICE DRAWER 84
WINSTON-SALEM, NORTH CAROLINA 27102
TELEPHONE (919) 721-3600
TELECOPY (919) 721-3660
TELEX 806498

RALEIGH OFFICE
901 WACHOVIA BUILDING
227 PAYETTEVILLE STREET MAIL
POST OFFICE BOX 831
RALEIGH, NORTH CAROLINA 27602
TELEPHONE (919) 828-7214
TELECOPY (919) 834-4295
TELEX 806498

WRITER'S DIRECT NUMBER

(919) 721-3714

February 11, 1988



Mr. Gary Babb
Compliance
Department of Human Resources
Solid & Hazardous Waste Management Section
Post Office Box 2091
Raleigh, North Carolina 27602-2091

Re: Section permission to backfill Bassick-Sack
excavated areas

Dear Gary:

The purpose of this letter is to confirm our conversation of February 10, 1988, concerning the Section permitting Bassick-Sack to backfill certain areas excavated pursuant to a required remedial action at the Bassick-Sack facility. Specifically, in response to our request of February 9, 1988, you have permitted us to backfill, without imposing any post-excitation obligations (including those under the Resource Conservation and Recovery Act), those excavated sections designated in our original site assessment as 1A, 1B, 1C, 1D, 1E and 3A. However, this permission has been granted by the Section with the understanding Bassick-Sack acknowledges there remains in those sections residual levels of nickel which are above those levels permitted in water under applicable drinking water standards but which are also substantially below those permitted in North Carolina sanitary landfills.

Based on your permission we expect the backfilling of these areas to begin February 15, 1988. Further, post-excitation sample results for the other remedial action sections are expected on or about February 15, 1988 and will be shared with

Mr. Gary Babb
February 11, 1988
Page 2

the Section to determine if the backfilling of those areas may likewise go forward.

Within our request of February 9, 1988 we asked the Section to provide written confirmation the above described sections had been "cleaned" to a level acceptable to the Section without the imposition of groundwater monitoring or other post-excavation care. Please find enclosed a draft of such a "confirmation" for your review. We would appreciate your returning a signed copy of this draft or another similar document in the near future for placement in our files. Should you have any questions concerning this letter or the draft feel free to give me a call.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Edgar DeVyllder, Esq.
R. Howard Grubbs, Esq.

WOMBLE CARLYLE SANDRIDGE & RICE

1600 ONE TRIAD PARK

AND

2400 WACHOVIA BUILDING

WINSTON-SALEM, NORTH CAROLINA 27101

CHARLOTTE OFFICE
3300 ONE FIRST UNION CENTER
CHARLOTTE, NORTH CAROLINA 28202-6028
TELEPHONE (704) 334-8000
TELECOPY (704) 334-0668
TELEX 883600

MAILING ADDRESS
POST OFFICE DRAWER 84
WINSTON-SALEM, NORTH CAROLINA 27102
TELEPHONE (919) 721-3800
TELECOPY (919) 721-3800
TELEX 808498

RALEIGH OFFICE
800 WACHOVIA BUILDING
POST OFFICE BOX 631
RALEIGH, NORTH CAROLINA 27602
TELEPHONE (919) 755-2100
TELECOPY (919) 755-2100
TELEX 808498

WRITER'S DIRECT NUMBER

(919) 721-3714

July 6, 1988



Mr. Gary Babb
Compliance
Department of Human Resources
Solid and Hazardous Waste Management Section
P.O. Box 2091
Raleigh, North Carolina 27602-2091

Re: Bassick-Sack Facility -- Permission to backfill
certain excavated areas

Dear Gary:

The purpose of this letter is to confirm our conversation of June 6, 1988 regarding the above referenced matter. Specifically, you were presented with the following information in an effort to obtain the Section's permission to backfill these areas.

First, Bassick-Sack has retained GSX Services, Inc. to excavate those areas to be designated in R&A Laboratories' final report as "Area A" and "Area B". Second, upon completion of the excavation, R&A Laboratories took samples from the sides (approximately 10) and the bottoms (approximately 10) of each of the areas. These multiple samples were then composited for each of the areas and were thoroughly mixed to create representative samples. Third, R&A Laboratories then subjected the samples to analyses for volatile organics (EPA method 624) and other constituents (EP Toxicity). A review of the results of those analyses is enclosed.

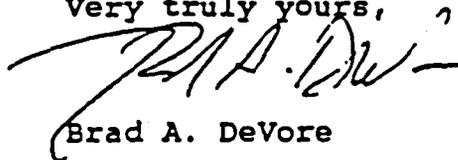
It is our understanding that based upon the above information, the Section has granted Bassick-Sack permission to

Mr. Gary Babb
July 6, 1988
Page 2

backfill those excavated areas to be designated as "Area A" and "Area B" in the R&A Laboratories final report. This permission was granted because the residual contamination within these areas failed to exceed any limits imposed by the Section. Bassick-Sack will be relying upon this commitment in backfilling the areas on July 11, 1988.

Should you disagree with or have any questions concerning the contents of this letter please contact me prior to July 11, 1988. We appreciate your cooperation in this matter.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Edgar DeVylde, Esq. (w/ enclosure)
Jim Stanley (w/ enclosure)
Jim Chesire (w/ enclosure)

POST EXCAVATION SAMPLE ANALYSES REPORT

Volatile Organics (VOA)/EPA Method 624

<u>"A"</u>	<u>"B"</u>
< 20 ppb for all VOAs	< 20 ppb for all VOAs

EP TOXICITY (Extractables)

	<u>"A"</u>	<u>"B"</u>
Chromium	< 0.017	< 0.017
Copper	< 1.77	< 5.32
Lead	< 0.10	< 0.10
Nickel	< 0.47	< 0.529
Zinc	< 37.3	< 192.0
Cyanide	< 0.005	< 0.005
Sulfide	< 2.56	< 2.88
Ignitability	> 140°F	> 140°F
Corrosivity	6.6	6.6

WOMBLE CARLYLE SANDRIDGE & RICE

1600 ONE TRIAD PARK

AND

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CHARLOTTE, NORTH CAROLINA 28202-6028
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TELECOPY (704) 331-4888
TELEX 863808

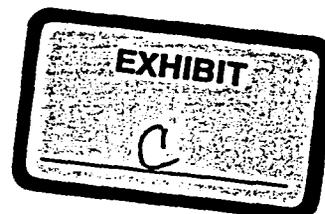
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WRITER'S DIRECT NUMBER

(919) 721-3714

July 14, 1988



Mr. Gary Babb
Compliance
Department of Human Resources
Solid and Hazardous Waste Management Section
P.O. Box 2091
Raleigh, North Carolina 27602-2091

Re: Bassick-Sack Facility -- Permission to backfill
certain excavated areas

Dear Gary:

The purpose of this letter is to confirm our conversation of July 13, 1988 regarding the above referenced matter. Specifically, you were presented with the following information in an effort to obtain the Sectin's permission to backfill this area.

First, Bassick-Sack has retained GSX Services, Inc. to excavate those areas to be designated in R&A Laboratories' final report as "Area C". Second, upon completion of the excavation, R&A Laboratories took samples from the sides (approximately 10) and the bottoms (approximately 10), of the area. These multiple samples were then composited and thoroughly mixed to create a representative sample. Third, R&A Laboratories then subjected the sample to analyses for volatile organics (EPA method 624) and other constituents (EP Toxicity). A review of the results of those analyses is enclosed.

It is our understanding that based upon the above information, the Section has granted Bassick-Sack permission to backfill that excavated area to be designated as "Area C" in the

Mr. Gary Babb
July 14, 1988
Page 2

R&A Laboratories final report. This permission was granted because the residual contamination within this area failed to exceed any limits imposed by the Section. Bassick-Sack will be relying upon this commitment in backfilling the area on July 18, 1988.

Should you disagree with or have any questions concerning the contents of this letter please feel free to contact me prior to July 18, 1988. We appreciate your cooperation in this matter.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Edgar DeVyllder, Esq. (w/ enclosure)
Jim Stanley (w/ enclosure)
Jim Chesire (w/ enclosure)

POST EXCAVATION SAMPLE ANALYSES REPORT FOR AREA "C"

Volatile Organics (VOA)/EPA Method 624

< 20 ppb for all VOAs

EP TOXICITY (Extractables) FOR AREA "C"

Chromium	< 0.04
Copper	< 9.2
Nickel	< 0.47
Zinc	< 77.0
Cyanide	< 0.005

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RALEIGH, NORTH CAROLINA
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TELECOPY (919) 755-7111
TELEX 806486

(919) 701-37

July 14, 1988

Mr. Gary Eabli
Compliance
Department of Human Resources
Solid and Hazardous Waste Management Section
P.O. Box 2091
Raleigh, North Carolina 27602-2091

Re: Bassick-Sack Facility -- Permission to backfill
certain excavated areas

Dear Gary:

The purpose of this letter is to confirm our conversation of July 13, 1988 regarding the above referenced matter. Specifically, you were presented with the following information in an effort to obtain the Section's permission to backfill this area.

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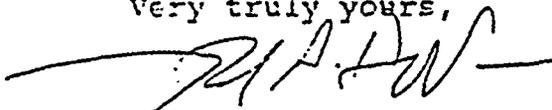
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. Gary Babb
July 14, 1988
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Should you disagree with or have any questions concerning the contents of this letter please feel free to contact me prior to July 18, 1988. We appreciate your cooperation in this matter.

Very truly yours,



Erad A. DeVore

EAD/ari

cc: Edgar DeVolder, Esq. (w/ enclosure)
Jim Stanley (w/ enclosure)
Jim Chesire (w/ enclosure)

POST EXCAVATION SAMPLE ANALYSES REPORT FOR AREA "C"

Volatile Organics (VOA)/EPA Method 624

< 20 ppb for all VOAs

EP TOXICITY (Extractables) FOR AREA "C"

Chromium	< 0.04
Copper	< 9.2
Nickel	< 0.47
Zinc	< 77.0
Cyanide	< 0.005

Street Warner - Bassick.
Reference 28
N CD 024875864

WJ.

WOMBLE CARLYLE SANDRIDGE & RICE

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AND

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TELEX 808488

WRITER'S DIRECT NUMBER

(919) 721-3714

September 5, 1988



Mr. R. Douglas Holyfield
Field Operations Supervisor
Hazardous Waste Compliance Unit
Solid and Hazardous Waste Section
306 N. Wilmington Street
Room 213, Bath Building
Raleigh, North Carolina 27602

Re: Bassick-Sack -- Remedial Activities -- Report on
Completion of all Activities at Facility Located
at 2941 Indiana Avenue, Winston-Salem, NC

Dear Doug:

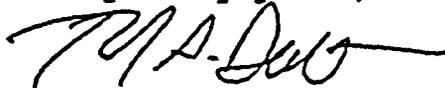
The purpose of this letter is to provide you with the necessary information to confirm Bassick-Sack has completed all required remedial activities at the above referenced location. In support of this statement, please find enclosed final reports covering the remedial actions completed at the facility regarding "Spill Sites 1 and 2" and "Areas A, B and C" (Attachments I and II). Also enclosed are copies of letters to the Section confirming the permission granted to Bassick-Sack to backfill various excavated areas (Attachment III).

A review of these documents reveal the contaminants found within Spill Sites 1 and 2 and Areas A, B and C were remediated to residual levels acceptable to the Section. Thereafter, all excavated areas were properly backfilled with clean soil. Note, Steve Phibbs of your office was often in attendance during the course of the remedial activities and/or took split samples of potentially contaminated soils for analysis.

Mr. R. Douglas Holyfield
September 5, 1988
Page 2

In view of the foregoing, Bassick-Sack requests the Section provide written confirmation the Company has completed all appropriate and necessary remedial activities at the site (including those required by any Notices of Violations). We appreciate the cooperation provided by yourself and other members of the Section in completing these activities. In the event you have questions concerning the enclosed documents or this request, please feel free to contact me directly.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Gary Babb (w/ enclosures)
Edgar DeVyllder, Esq. (w/ enclosures)
R. Howard Grubbs, Esq. (w/ enclosures)

Attachment
I



RESEARCH & ANALYTICAL LABORATORIES, INC.

Analytical/Process Consultations

25 March 1988

Womble Carlyle Sandridge & Rice
P.O. Drawer 84
Winston-Salem, North Carolina 27102

Attention: Mr. Brad DeVore

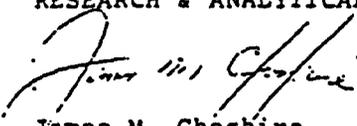
Dear Mr. DeVore

Enclosed please find one (1) copy of Remedial Sampling and Analyses at Chemical Spill Sites 1 and 2 for Stewart Warner Corporation/Bassick-Sack Division - January 28, 1988 - February 23, 1988.

If you have any questions concerning this report please so advise.

Sincerely,

RESEARCH & ANALYTICAL LABORATORIES, INC.


James M. Cheshire
President

JMC/jf

enclosure

cc: Mr. Jim Stanley

REMEDIAL SAMPLING AND ANALYSES AT
CHEMICAL SPILL SITES 1 and 2 FOR
STEWART WARNER CORPORATION/
BASSICK-SACK DIVISION
WINSTON-SALEM, NORTH CAROLINA
JANUARY 28, 1988 - FEBRUARY 22, 1988

Prepared for:

Stewart Warner Corporation/
Bassick-Sack Division
Winston-Salem, North Carolina

Prepared by:

Research & Analytical Laboratories, Inc.
106 Short Street
Kernersville, North Carolina 27284
919/996-2841

March 1988

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1.0 INTRODUCTION:

The information contained in this report consists of the remedial sampling activities provided by Research & Analytical Laboratories, Inc. (RAL) for Stewart-Warner Corporation (Bassick-Sack Division) at two (2) chemical spill sites located at their Winston-Salem, North Carolina facility. The remedial sampling activities, covering a period from 28 January 1988 through 22 February 1988, are in accordance with the Remedial Proposal outlined in Section 4.0 of the Comprehensive Site Report For The Assessment of Chemical Contamination at Spill Sites 1 and 2 - Bassick-Sack Division, Winston-Salem, North Carolina (July 1987). In reviewing the analytical data contained in this report it is important to note the following information:

- 1) GSX Services, Inc. provided clean-up and disposal of contaminated soils within Chemical Spill Sites 1 and 2. Information pertaining to clean-up and disposal strategies as well as quantities removed etc., should be on record with GSX Services, Inc.
- 2) The law firm of Womble Carlyle Sandridge and Rice coordinated the transfer of post excavation analytical test results to the North Carolina Solid and Hazardous Waste Management Branch.
- 3) The North Carolina Solid and Hazardous Waste Management Branch approved the back filling at Chemical Spill Sites 1 and 2 after post excavation and sampling had been completed and reviewed. Uncontaminated soil used for backfill was taken from Vulcan Materials East Forsyth Quarry.
- 4) A representative from the North Carolina Solid and Hazardous Waste Management Branch was present at Chemical Spill Sites 1 and 2 during post excavation and sampling. No concerns or objections with respect to post excavation, sampling strategies, etc. were communicated or evidenced by this official state representative to RAL personnel.

The following sections of this report include materials, methods, and results of all remedial sampling activities at Chemical Spill Sites 1 and 2.

2.0 MATERIALS AND METHODS

The information contained in this section is based upon the Comprehensive Sampling/Analysis Plan to Determine the Extent of Chemical Contamination at Spill Site(s) Located at Bassick-Sack Division, Winston-Salem, North Carolina prepared by RAL in June 1987. Post excavation sampling analyses for selected parameters were used to verify upon acceptance by regulatory agency the minimum contaminated soil removal requirements at Spill Sites 1 and 2. This also represents the vertical movement of contaminants. The horizontal movement of contaminants was determined by chemical analysis from vertical soil samples collected in Quadrant 26 or 50 feet North of Quadrant 2, Section A on 11 September 1987. The results of this analysis include the following:

<u>Parameter</u>	<u>Depth Interval(inches)</u>			
	<u>0-3</u>	<u>3-6</u>	<u>6-9</u>	<u>9-12</u>
Extractable Zinc(mg/l)	3.4	0.97	0.59	0.42
Extractable Copper(mg/l)	0.13	0.12	0.02	0.02
Extractable Nickel(mg/l)	0.29	0.17	0.03	0.11
Extractable Chromium(mg/l)	<0.02	<0.02	<0.02	<0.02
Extractable Lead(mg/l)	<0.05	<0.05	<0.05	<0.05
Extractable Cyanide(mg/l)	1.9	0.18	0.17	0.18
pH(Std. Units)	6.2	6.0	6.0	6.0
Total Solids(%)	89	99	94	92

The post excavation sampling/analysis procedures included the following chronology of events:

<u>Date</u>	<u>Time</u>	<u>Event</u>
1/22/88	1000-1200 hrs	Pre-excavation meeting
1/23/88	0800-1200 hrs	Quadrant Marker Replacement
1/24/88	1500-1700 hrs	Quadrant Marker Replacement
1/28/88	0900-1000 hrs	Quadrant 1A Sample Collection
1/28/88	1000-1100 hrs	Quadrant 1B Sample Collection
1/28/88	1100-1200 hrs	Quadrant 1C Sample Collection
1/28/88	1200-1300 hrs	Quadrant 1D Sample Collection
1/29/88	1400-1500 hrs	Quadrant 1E Sample Collection
2/2/88	1500-1600 hrs	Quadrant 3A Sample Collection
2/9/88	1600-1700 hrs	Quadrant 3B Sample Collection
2/11/88	1700-1800 hrs	Backfill Sample Collection
2/22/88	1000-1100 hrs	Quadrant 3B Resample Collection

Random soil composite samples were collected from each spill site section with a stainless steel trowel and soil was transferred to a four (4) gallon container. Composite soil samples from each container were thoroughly mixed and sample aliquot split with regulatory agency representative (ie: Mr. Steve Phibbs - 919/761-2390). Chain of Custody records are identified in Appendix A. The RCRA chemical analyses performed in triplicate on these sectional composite samples include the following parameters:

- 1) Zinc (Extractable)
- 2) Copper (Extractable)
- 3) Nickel (Extractable)
- 4) Chromium (Extractable)
- 5) Lead (Extractable)
- 6) Cyanide (Extractable)

The results of these analyses performed in triplicate were reported to representatives of Stewart Warner Corporation and their attorneys. The attorneys for Stewart Warner Corporation coordinated the analyses reporting with the North Carolina Hazardous Waste Compliance Unit so that backfilling could commence upon agency approval.

3.0 RESULTS

The results of the remedial sampling are described in Tables I-IV. Each composite sample collected was analyzed for selected parameters in triplicate using the RCRA or EP Toxicity Leachate procedure. Quadrant 3, Section B (Chemical Spill Site 1) was resampled after additional excavation had been completed as shown in Table IV. A significant reduction in contaminant concentration was identified for all chemical constituents analyzed.

TABLE I - Remedial Sampling for Selected Parameters at Chemical Spill Site 1
 Bassick-Sack, Winston-Salem, North Carolina (February 2-9, 1988)

Source	Zinc (mg/l)	Copper (mg/l)	Nickel (mg/l)	Chromium (mg/l)	Lead (mg/l)	Cyanide (mg/l)
3A ₁	35.7	3.7	0.833	0.016	<0.110	0.068
3A ₂	41.3	2.43	0.722	0.016	<0.110	0.164
3A ₃	40.8	4.26	0.806	0.016	<0.110	0.055
AVG.	39.3	3.46	0.787	0.016	<0.110	0.091
3B ₁	1.73	0.85	0.65	<0.017	<0.110	0.936
3B ₂	9.40	1.4	1.60	<0.017	<0.110	0.936
3B ₃	8.60	1.2	1.30	<0.017	<0.110	0.816
AVG.	6.58	1.15	1.18	<0.017	<0.110	0.896
2A ₁	10.9	0.19	0.240	<0.017	<0.110	<0.005
2A ₂	15.2	0.93	0.320	<0.017	<0.110	<0.005
2A ₃	15.6	0.73	0.320	<0.017	<0.110	<0.005
AVG.	13.9	0.62	0.293	<0.017	<0.110	<0.005
2B ₁	15.7	0.13	0.240	<0.017	<0.110	<0.005
2B ₂	53.2	2.1	0.470	<0.017	<0.110	<0.005
2B ₃	59.6	2.96	0.440	<0.017	<0.110	<0.005
AVG.	42.83	1.73	0.383	<0.017	<0.110	<0.005
2C ₁	62.9	2.9	0.320	<0.017	<0.110	<0.005
2C ₂	78.3	7.5	0.410	<0.017	<0.110	<0.005
2C ₃	149	14.7	0.590	<0.017	<0.110	<0.005
AVG.	96.73	8.37	0.44	<0.017	<0.110	<0.005
2D ₁	34.9	0.73	0.440	<0.017	<0.110	<0.005
2D ₂	80.0	7.1	0.650	<0.017	<0.110	<0.005
2D ₃	78.3	6.9	0.650	<0.017	<0.110	<0.005
AVG.	64.4	4.91	0.58	<0.017	<0.110	<0.005
2E ₁	18.4	0.96	2.0	<0.017	<0.110	<0.005
2E ₂	33.6	5.0	2.0	<0.017	<0.110	<0.005
2E ₃	40.0	7.1	3.1	<0.017	<0.110	<0.005
AVG.	30.67	4.35	2.37	<0.017	<0.110	<0.005

TABLE II - Remedial Sampling for Selected Parameters at Chemical Spill Site 2
Bassick-Sack, Winston-Salem, North Carolina (January 28, 1988)

Source	Zinc (mg/l)	Copper (mg/l)	Nickel (mg/l)	Chromium (mg/l)	Lead (mg/l)	Cyanide (mg/l)
1A ₁	5.2	0.982	0.556	<0.017	<0.110	<0.005
1A ₂	8.4	0.91	1.08	<0.017	<0.110	<0.005
1A ₃	8.63	0.37	1.03	<0.017	<0.110	<0.005
AVG.	7.41	0.754	0.889	<0.017	<0.110	<0.005
1B ₁	57.8	4.6	2.67	<0.017	<0.110	<0.005
1B ₂	38.7	2.0	1.58	<0.017	<0.110	<0.005
1B ₃	22.0	0.65	1.19	<0.017	<0.110	<0.005
AVG.	39.5	2.42	1.81	<0.017	<0.110	<0.005
1C ₁	29.8	1.86	1.89	<0.017	<0.110	<0.005
1C ₂	15.2	0.65	1.0	<0.017	<0.110	<0.005
1C ₃	10.0	0.44	0.47	<0.017	<0.110	<0.005
AVG.	18.3	0.923	1.12	<0.017	<0.110	<0.005
1D ₁	20.8	3.12	2.05	<0.017	0.110	<0.005
1D ₂	21.2	3.08	1.97	<0.017	0.110	<0.005
1D ₃	15.6	1.57	1.27	<0.017	0.110	<0.005
AVG.	19.2	2.59	1.76	<0.017	0.110	<0.005
1E ₁	9.3	0.89	0.64	0.017	<0.110	<0.005
1E ₂	3.83	0.16	0.33	<0.017	<0.110	<0.005
1E ₃	4.45	0.13	0.44	<0.017	<0.110	<0.005
AVG.	5.86	0.393	0.47	<0.017	<0.110	<0.005

TABLE III - RCRA Analyses of Backfill Soil for Selected Parameters for Chemical Spill Sites I and II at Bassick-Sack, Winston-Salem, North Carolina (February 11, 1988)

<u>Parameter</u>	<u>Concentration</u> <u>(mg/l)</u>
Zinc	0.124
Copper	0.019
Nickel	0.029
Chromium	<0.017
Cyanide	<0.125

TABLE IV - Remedial Sampling for Extractable Cyanide at Chemical Spill Site 1, Quadrant 3, Section B, Bassick-Sack, Winston-Salem, North Carolina (February 22, 1988)

<u>Source</u>	<u>Cyanide(mg/l)</u>
3B ₁	0.16
3B ₂	0.18
3B ₃	0.17

4.0 DISCUSSION

The information contained in this report has been used by representatives for Stewart Warner Corporation to seek approval from the North Carolina Solid and Hazardous Waste Management Branch to commence with the back-filling of Chemical Spill Site's 1 and 2. Total compliance with remedial clean-up activities and backfill operations as approved by regulatory agency for Chemical Spill sites 1 and 2 is expected by April 8, 1988

FINAL REPORT CONCERNING
CHEMICAL SPILL SITES 1, 2
and AREAS A, B, and C

STEWART-WARNER CORPORATION
BASSICK-SACK DIVISION
WINSTON-SALEM, NORTH CAROLINA

Prepared by:

Research & Analytical Laboratories, Inc.
106 Short Street
Kernersville, North Carolina 27284
919/996-2841

August 1988

TABLE OF CONTENTS

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1.0 INTRODUCTION

In response to Mr. Brad DeVore's (Consulting Attorney - Womble Carlyle Sandridge and Rice) July 14, 1988 letter to Mr. Gary Babb (North Carolina Solid and Hazardous Waste Section), Research & Analytical Laboratories, Inc. (RAL) has prepared this Final Report in an effort to document the conclusions of all environmental remedial activities at the Winston-Salem, North Carolina Bassick-Sack Facility with respect to Chemical Spill Site 1, 2 and Area A, B, and C. The reference material preceding this report which details the chronology of events includes the following:

- 1) Comprehensive Sampling/Analysis Plan To Determine the Extent of Chemical Contamination at Spill Site(s) Located at Bassick-Sack Division, Winston-Salem, North Carolina - June 1987
- 2) Comprehensive Site Report for the Assessment of Chemical Contamination at Spill Sites 1 and 2, Bassick-Sack Division, Winston-Salem, North Carolina, July 1987
- 3) Proposal for Establishing Maximum Limits for Cyanide, Copper, Chromium, Zinc, and Nickel at Chemical Spill Sites 1 and 2, Stewart Warner Corporation - Bassick-Sack Division, Winston-Salem, North Carolina - August 1987
- 4) Remedial Sampling and Analyses At Chemical Spill Sites 1 and 2 for Stewart Warner Corporation - Bassick-Sack Division, Winston-Salem, North Carolina, January 28, 1988 - February 22 1988.
- 5) Progress Report Concerning The Excavation and Remedial Sampling of "Pit Area" Outside Chemical Spill Sites 1 and 2, Stewart Warner Corporation, Bassick-Sack Division, Winston-Salem, North Carolina, March 1988.

The environmental support groups involved in the coordination-negotiations, technical assessment-verification, and excavation-disposal include the following:

- 1) Womble Carlyle Sandridge and Rice Attorneys (Mr. Brad A. DeVore, Esq. 919/721-3714)
- 2) Research & Analytical Laboratories, Inc. (Mr. James M. Cheshire, 919/996-2841)
- 3) GSX, Services, Inc. (Mr. John DiCarlo,, 803/452-5003)

A checklist was prepared during these investigations. Chemical Spill Site 1, 2, and Area's A-C. A summary of this information, if needed, is available upon request which includes the following:

- 1) Synopsis or abstract concerning statement of problem, regulatory conflict, environmental assessment, and closure
- 2) Site map
- 3) Authorization Request Form
- 4) Written or verbal approval by North Carolina regulatory agency for backfilling
- 5) Excavation starting and ending dates
- 6) Manifests
- 7) Quantity of waste material removed
- 8) Backfill starting and ending dates
- 9) Verification of backfill compaction
- 10) Verification of compaction testing
- 11) Reference listing

The following sections of this report provide certified analytical data concerning the contaminated soil removal for Areas A, B, and C located outside chemical spill sites 1 and 2. This information, as well as the closure of chemical spill sites 1 and 2, should conclude all remedial activities at these sites.

Areas's A-C - Excav. on and Samoling Verification

A map showing Area A-C in relationship to Chemical Spill Sites 1 and 2 is provided in the insert pocket of this report. Excavation of drums, metal debris, crucibles, and contaminated soils, etc. were completed in July 1988. Three (3) zones of contamination were identified in this area and were identified as Pit A, B, and C. Soil samples were collected and composited from each pit after excavation showed no visible signs of soil discoloration. Soil samples were collected from the bottom and sidewalls of each pit in order to assess the vertical and horizontal extent of any residual contamination. Excavation continued after initial sampling if volatile organics (VOA) were still present and/or if RCRA copper, nickel, zinc, chromium, or cyanide showed significantly high concentrations. Tables 1 and 2 show the VOA and RCRA results for Pits A, B, and C during excavation. Table 3 identified the contaminated stock pile with respect to RCRA and VOA tests. Table 4 represents backfill analyses to verify that fill material was not contaminated.

Results of soil analysis from each pit was submitted to Mr. Brad DeVore who in turn reported this information to the North Carolina Solid and Hazardous Waste Section for approval to commence backfilling. The same procedure was followed for Chemical Spill Sites 1 and 2 which has been reported in the Remedial Sampling and Analyses at Chemical Spill Sites 1 and 2, January 28, 1988 - February 22, 1988

TABLE 1 - RCRA and Volatile Organic Analyses for Selected Parameters at Area's A-C (Pit A, B, and C) on June 29, 1988 (Bassick-Sack, Winston-Salem, North Carolina)

<u>Parameter</u>	<u>Type</u>	<u>Unit</u>	<u>Pit A</u>	<u>Pit B</u>	<u>Pit C</u>
Chromium	RCRA	mg/l	<0.017	<0.017	<0.017
Copper	RCRA	mg/l	1.77	5.32	76
Nickel	RCRA	mg/l	0.47	0.529	1.32
Zinc	RCRA	mg/l	37.3	192	283
Cyanide	RCRA	mg/l	3.51	2.24	2.49
Cyanide	<u>Extractable</u>	mg/l	<0.005	<0.005	<0.005
Sulfide	RCRA	mg/l	<2.56	<2.88	<2.8
Lead	RCRA	mg/l	<0.10	<0.10	2.0
Corrosivity	RCRA	Std. Units	6.6	6.6	7.6
Flash Point	RCRA	°F	>140	>140	>140
VOA	VOA	ug/kg	<20*	<20*	**

*All volatile organics (Method 624) were reported less than 20 ug/kg

** Trichloroethene = 70 ug/kg

Tetrachloroethene = 203 ug/kg

All other VOA = <20 ug/kg

TABLE 2 - RCRA and Volatile Organic Analyses for Selected Parameters at Area's A-C (Pit A,B,C) on July 7, 1988 (Bassick-Sack, Winston-Salem, North Carolina)

<u>Parameter</u>	<u>Type</u>	<u>Unit</u>	<u>Pit A</u>	<u>Pit B</u>	<u>Pit C</u>
Arsenic	RCRA	mg/l	<0.010	<0.010	<0.010
Barium	RCRA	mg/l	0.30	0.30	0.2
Cadmium	RCRA	mg/l	0.008	0.032	0.008
Chromium	RCRA	mg/l	<0.020	<0.020	0.04
Lead	RCRA	mg/l	<0.120	<0.120	<0.120
Mercury	RCRA	mg/l	<0.0002	<0.0002	<0.0002
Selenium	RCRA	mg/l	<0.002	<0.002	<0.002
Silver	RCRA	mg/l	<0.016	<0.016	<0.016
Cyanide	RCRA	mg/l	2.8	9.0	2.6
Cyanide	Extractable	mg/l	<0.005	<0.005	<0.005
VOA	VOA	ug/kg	*<20	*<20	*<20
Zinc	RCRA	mg/l	---	136	77
Nickel	RCRA	mg/l	---	0.47	0.47
Copper	RCRA	mg/l	---	4.7	9.2

*All volatile organics (Method 624) were reported less than 20 ug/kg

*Reached levels
RCRA limits*

TABLE 3 - RCRA and Volatile Organic Analysis of ^{AKK} Stock Pile from Area's A-C
(Pit A, B, C) on July 8, 1988 (Bassick-Sack, Winston-Salem, North Carolina)

<u>Parameter</u>	<u>Type</u>	<u>Unit</u>	<u>Concentration</u>
Arsenic	RCRA	mg/l	<0.010
Barium	RCRA	mg/l	0.9
Cadmium	RCRA	mg/l	0.22
Chromium	RCRA	mg/l	<0.020
Lead	RCRA	mg/l	<0.120
Mercury	RCRA	mg/l	<0.0002
Selenium	RCRA	mg/l	<0.002
Silver	RCRA	mg/l	<0.016
Flash Point	RCRA	°F	>140
Corrosivity	RCRA	mg/l	6.6
Sulfide	RCRA	mg/l	<0.40
Cyanide	Extractable	mg/l	<0.025
VOA	VOA	µg/kg	*

* Trichloroethene = 78 µg/kg
Tetrachloroethene = 120 µg/kg
All other VOAs = <20 µg/kg

TABLE 4 - Backfill Analyses for Selected Parameters from Samples Collected on July 14, 1988 (Bassick-Sack, Winston-Salem, North Carolina)

<u>Parameter</u>	<u>Type</u>	<u>Units</u>	<u>Concentration</u>
Arsenic	RCRA	mg/l	<0.005
Barium	RCRA	mg/l	<0.083
Cadmium	RCRA	mg/l	0.008
Chromium	RCRA	mg/l	<0.010
Lead	RCRA	mg/l	<0.12
Mercury	RCRA	mg/l	<0.0002
Selenium	RCRA	mg/l	<0.002
Silver	RCRA	mg/l	<0.016
Copper	RCRA	mg/l	<0.02
Nickel	RCRA	mg/l	0.176
Zinc	RCRA	mg/l	0.021
Flash Point	RCRA	°F	>140
Sulfide	RCRA	mg/l	<0.4
Cyanide	RCRA	mg/kg	<0.039
Corrosivity	RCRA	Std. Units	4.6
Chromium	Total	mg/kg	23
Copper	Total	mg/kg	20
Lead	Total	mg/kg	12
Nickel	Total	mg/kg	25
Zinc	Total	mg/kg	80
VOA	VOA	ug/kg	*<20

*All volatile organics (Method 624) were reported less than 20 ug/kg

3.0 DISCUSSION

This report concludes all remedial activities at the Bassick-Sack Facility (Winston-Salem, North Carolina) for Chemical Spill Sites 1,2, and Area's A-C. Since the final approvals to backfill all of the above referenced sites by the North Carolina Solid and Hazardous Waste Section, all required reporting, assessments, clean-up, disposal, and backfilling has been completed by July 29, 1988. Research & Analytical Laboratories, Inc., principal technical consultant on project, certifies that to the best of its knowledge all information presented within this and previous RAL project status reports is true and correct.

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WRITER'S DIRECT NUMBER

(919) 721-37

February 11, 1988

Mr. Gary Babb
Compliance
Department of Human Resources
Solid & Hazardous Waste Management Section
Post Office Box 2091
Raleigh, North Carolina 27602-2091

Re: Section permission to backfill Bassick-Sack
excavated areas

Dear Gary:

The purpose of this letter is to confirm our conversation of February 10, 1988, concerning the Section permitting Bassick-Sack to backfill certain areas excavated pursuant to a required remedial action at the Bassick-Sack facility. Specifically, in response to our request of February 9, 1988, you have permitted us to backfill, without imposing any post-excitation obligations (including those under the Resource Conservation and Recovery Act), those excavated sections designated in our original site assessment as 1A, 1B, 1C, 1D, 1E and 3A. However, this permission has been granted by the Section with the understanding Bassick-Sack acknowledges there remains in those sections residual levels of nickel which are above those levels permitted in water under applicable drinking water standards but which are also substantially below those permitted in North Carolina sanitary landfills.

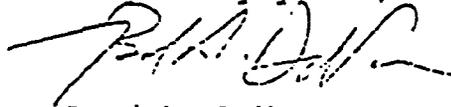
Based on your permission we expect the backfilling of these areas to begin February 15, 1988. Further, post-excitation sample results for the other remedial action sections are expected on or about February 15, 1988 and will be shared with

Mr. Gary Babl
February 11, 1988
Page 2

the Section to determine if the backfilling of those areas may likewise go forward.

Within our request of February 9, 1988 we asked the Section to provide written confirmation the above described sections had been "cleaned" to a level acceptable to the Section without the imposition of groundwater monitoring or other post-excavation care. Please find enclosed a draft of such a 'confirmation' for your review. We would appreciate your returning a signed copy of this draft or another similar document in the near future for placement in our files. Should you have any questions concerning this letter or the draft feel free to give me a call.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Edgar DeVyllder, Esq.
R. Howard Grubbs, Esq.

(919) 721-37.

February 11, 1988

Brad A. DeVore, Esq.
WOMBLE CARLYLE SANDRIDGE & RICE
Post Office Drawer 84
Winston-Salem, North Carolina 27102

Re: Bassick-Sack compliance with residual
contamination levels

Dear Brad:

Thank you for your letter of February 9, 1988 to the Section concerning residual contamination levels in the excavated sections, 1A, 1B, 1C, 1D, 1E and 3A of the Bassick-Sack remedial action.

The sample results attached to your letter indicate Bassick-Sack has removed all contaminants to a level acceptable to the Section. As a result, the Section relieves Bassick-Sack of any obligation to either conduct further excavation, analyses or post-excavation care (including those imposed under the Resource Conservation and Recovery Act) related to these sections. However, Bassick-Sack is relieved of these obligations with the understanding it acknowledges residual amounts of nickel in these areas exceed those levels permitted in water under applicable drinking water standards while substantially below those permitted in North Carolina sanitary landfills.

On behalf of the Section, I thank Bassick-Sack for its steady and friendly cooperation in this remedial action. We look forward to reviewing the sample results of the other excavated areas in the near future.

Very truly yours,

R. Douglas Holyfield

WOMBLE CARLYLE SANDRIDGE RICE

1600 ONE TRIAD PARK

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WRITER'S DIRECT NUMBER

(919) 721-371

February 16, 1988

Mr. R. Douglas Holyfield
Operations Supervisor
Hazardous Waste Compliance Unit
Solid & Hazardous Waste Section
306 North Wilmington Street
Room 213, Bath Building
Raleigh, North Carolina 27602

Re: Bassick-Sack clean-up -- Progress report and
request for permission to backfill

Dear Doug:

As we discussed on February 15, 1988, all areas indicated contaminated in our initial spill site assessment were excavated as of February 12, 1988. Enclosed are the post-excavation sample results from sections 2A, 2B, 2C, 2D, 2E (the railroad track area) and 3B (the courtyard area).

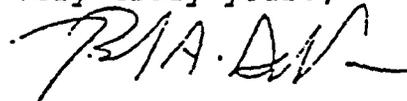
Based on the residual contamination levels revealed in the enclosed post-excavation samples, we request the Section allow for the backfilling of those areas designated 2A through 2E. In addition, we request the Section render a written confirmation the above described areas have been "cleaned" to a level acceptable to the Section without the imposition of groundwater monitoring or other post-excavation care. Based on the reasoning expressed in our letter of February 9, 1988, (concerning those areas designated 1A through 1E and 3A), we assert the residual contamination in areas 2A through 2E fails to pose a measurable threat to human health or the environment.

Mr. R. Douglas Holyfield
February 16, 1988
Page 2

We understand the Section will require further action (excavation or treatment) concerning the residual cyanide contamination found in section 3B. As a result, we will soon forward a proposed plan for this section to you. Finally, after additional excavation or treatment, sample results for residual cyanide contamination will be presented to the Section for permission to backfill this section.

We request the Section respond to our request concerning sections 2A through 2E as soon as possible as we have a contractor standing by to backfill those sections. Should you have any questions concerning the sample results or our request please feel free to call upon me.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Edgar DeVyllder, Esq.
R. Howard Grubbs, Esq.
Steve Phibbs

POST-EXCAVATION SAMPLE RESULTS
 (all counts are in ppm, all samples were run for
 triplicate results)

Source	Cyanide	Nickel	Chromium	Zinc	Copper
2A ₍₁₎	<0.005	0.24	<0.017	10.9	0.19
2A ₍₃₎	<0.005	0.32	<0.017	15.2	0.93
2A ₍₃₎	<0.005	0.32	<0.017	15.6	0.73
2B ₍₁₎	<0.005	0.24	<0.017	15.7	0.13
2B ₍₂₎	<0.005	0.47	<0.017	53.2	2.1
2B ₍₃₎	<0.005	0.44	<0.017	59.6	2.96
2C ₍₁₎	<0.005	0.32	<0.017	62.9	2.9
2C ₍₂₎	<0.005	0.41	<0.017	78.3	7.5
2C ₍₃₎	<0.005	0.59	<0.017	149.0	14.7
2D ₍₁₎	<0.005	0.44	<0.017	34.0	0.73
2D ₍₂₎	<0.005	0.65	<0.017	80.0	7.1
2D ₍₃₎	<0.005	0.65	<0.017	78.3	6.9
2E ₍₁₎	<0.005	2.0	<0.017	18.4	0.96
2E ₍₂₎	<0.005	2.0	<0.017	33.6	5.0
2E ₍₃₎	<0.005	3.1	<0.017	40.0	7.1
3B ₍₁₎	.96	0.65	<0.017	1.7	0.85
3B ₍₂₎	.552	1.6	<0.017	9.4	1.4
3B ₍₃₎	_____	1.3	<0.017	8.6	1.2

OMBLE CARLYLE SANDRIDGE & RICE

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WRITERS DIRECT NUMBER

(919) 721-33

February 19, 1988

Mr. R. Douglas Holyfield
Field Operations Supervisor
Hazardous Waste Compliance Unit
Solid & Hazardous Waste Section
306 North Wilmington Street
Room 213, Bath Building
Raleigh, North Carolina 27602

Re: Bassick-Sack clean-up -- Permission to backfill

Dear Doug:

The purpose of this letter is to confirm our conversation of February 19, 1988 during which you responded to our letter of February 16, 1988 requesting permission to backfill those sections designated in our initial spill site assessments as 2A, 2B, 2C, 2D and 2E. Based on our conversation, we understand the Section has permitted us to backfill the excavated areas designated 2A through 2E without the imposition of any post-excavation requirements (including groundwater monitoring).

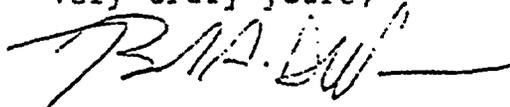
Further, we understand the Section requires further excavation and/or treatment of section 3B in order to reduce amounts of residual cyanide contamination found there. During our conversation, you were informed approximately nine (9) inches of additional soils had been removed from section 3B and that, weather permitting, post-excavation samples would be taken on or about February 22, 1988. Results of the residual cyanide contamination analyses will be forwarded to the Section as soon as possible.

Mr. R. Douglas Holyfield
February 19, 1988
Page 2

Finally, you indicated the Section requests further information on contamination, if any, to those areas located beyond section 1E and 2A (the area beyond where the two railroad tracks meet). In addition, the Section requests data on any other heavy metals residual contamination analyses for spill sites No. 1 and No. 2 (i.e., potential lead contamination). We agreed to forward this information, if available, to the Section in the near future.

As we will attempt to initiate backfilling as early as February 22, 1988, please contact me immediately if you are in disagreement with any aspect of this letter confirming our conversation. Should you have any questions please feel free to give me a call.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Edgar DeVyllder, Esq.
R. Howard Grubbs, Esq.
Jim Stanley
Steve Phibbs

WOMBLE CARLYLE SANDRIDGE & RICE

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WIRETELE DIRECT NUMBER

(919) 721-3711

July 6, 1988

Mr. Gary Babb
Compliance
Department of Human Resources
Solid and Hazardous Waste Management Section
P.O. Box 2091
Raleigh, North Carolina 27602-2091

Re: Bassick-Sack Facility -- Permission to backfill
certain excavated areas

Dear Gary:

The purpose of this letter is to confirm our conversation of June 6, 1988 regarding the above referenced matter. Specifically, you were presented with the following information in an effort to obtain the Section's permission to backfill these areas.

First, Bassick-Sack has retained GSX Services, Inc. to excavate those areas to be designated in R&A Laboratories' final report as "Area A" and "Area B". Second, upon completion of the excavation, R&A Laboratories took samples from the sides (approximately 10) and the bottoms (approximately 10) of each of the areas. These multiple samples were then composited for each of the areas and were thoroughly mixed to create representative samples. Third, R&A Laboratories then subjected the samples to analyses for volatile organics (EPA method 624) and other constituents (EP Toxicity). A review of the results of those analyses is enclosed.

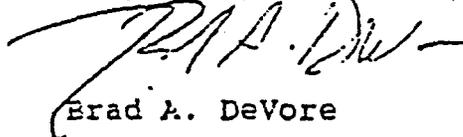
It is our understanding that based upon the above information, the Section has granted Bassick-Sack permission to

Mr. Gary Babb
July 6, 1988
Page 2

backfill those excavated areas to be designated as "Area A" and "Area B" in the R&A Laboratories final report. This permission was granted because the residual contamination within these areas failed to exceed any limits imposed by the Section. Bessick-Sack will be relying upon this commitment in backfilling the areas on July 11, 1988.

Should you disagree with or have any questions concerning the contents of this letter please contact me prior to July 11, 1988. We appreciate your cooperation in this matter.

Very truly yours,



Brad A. DeVore

BAD/asi

cc: Edgar DeVyllder, Esq. (w/ enclosure)
Jim Stanley (w/ enclosure)
Jim Chesire (w/ enclosure)

POST EXCAVATION SAMPLE ANALYSES REPORT

Volatile Organics (VOA)/EPA Method 624

<u>"A"</u>	<u>"B"</u>
< 20 ppb for all VOAs	< 20 ppb for all VOAs

EP TOXICITY (Extractables)

	<u>"A"</u>	<u>"B"</u>
Chromium	< 0.017	< 0.017
Copper	< 1.77	< 5.32
Lead	< 0.10	< 0.10
Nickel	< 0.47	< 0.529
Zinc	< 37.3	< 192.0
Cyanide	< 0.005	< 0.005
Sulfide	< 2.56	< 2.68
Ignitability	> 140 ^o F	> 140 ^o F
Corrosivity	6.6	6.6



Stewart Lerner -
Bassick Sack
- 2000
NCD 024 895 864

13

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

November 16, 1988

Mr. Brad A. DeVore
Womble, Carlyle, Sandridge and Rice
P.O. Drawer 84
Winston-Salem, North Carolina 27102

RE: Bassick-Sack, Completion of Remedial Activities

Dear Brad:

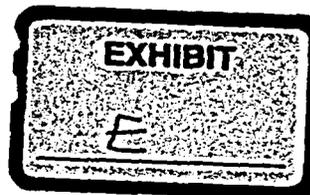
This office has reviewed the final report regarding site remediation and concurs with your conclusion that RCRA activities are complete. Residual levels of cyanide and the RCRA heavy metals are well within the acceptable levels previously established for Spill Sites 1 and 2. However, as noted in the analyses and your letter of 2-11-88, several secondary constituents remain above the ideal levels established in the interim primary drinking water standards. This however does not indicate the need for any additional remedial efforts at this time. In addition, our review of Areas A, B, and C indicated similar success.

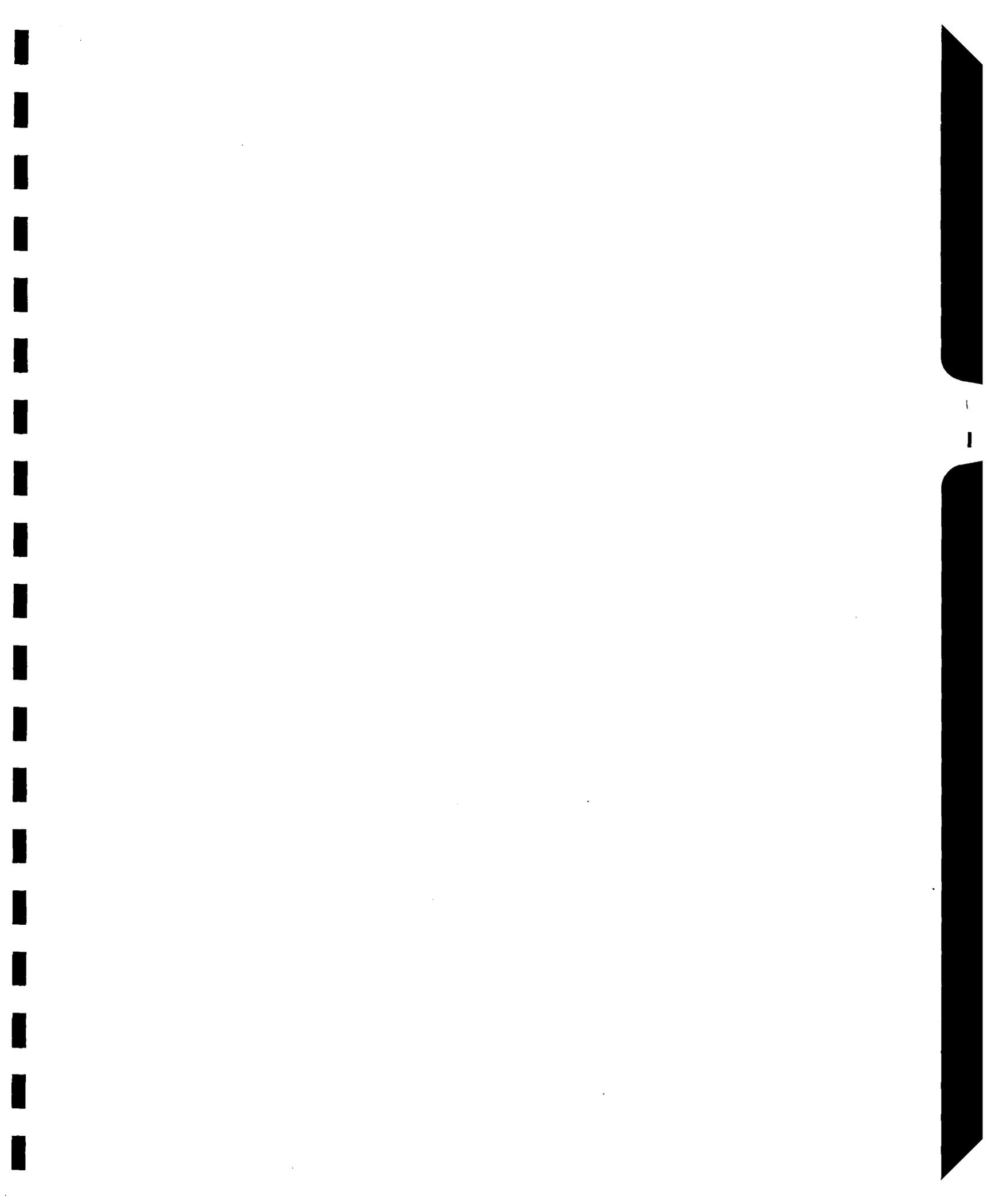
In conclusion, I would like to have copies of all manifests associated with the cleanup to complete my files. In that this site is listed as a CERCLA site, and that minor residual constituents remain, additional site and record reviews may be undertaken by that program and it may not preclude the possibility that the Division of Environmental Management may choose to evaluate the groundwater. Please call if you should have any questions or comments.

Sincerely,

R. Douglas Holyfield, Supervisor
Hazardous Waste Compliance Program
N. C. Hazardous Waste Branch

cc: Steve Phibbs
Gary Babb





IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION

CIVIL ACTION NO. 91-CV-00034

ILCO-UNICAN CORPORATION, A)
NORTH CAROLINA CORPORATION,)

PLAINTIFF,)

v.)

STEWART-WARNER CORPORATION, A)
VIRGINIA CORPORATION, AND)
STEWART-WARNER BASSICK-SACK)
CORPORATION, A DELAWARE)
CORPORATION,)

DEFENDANTS.)

DEPOSITION

OF

ISAAC D. BLAKLEY

VOLUME ONE

AT GREENSBORO, NORTH CAROLINA
FEBRUARY 19, 1992
10:05 A.M.

REPORTED BY: TRICIA ZUBLIONIS

COPY

POST OFFICE BOX 17418 • RALEIGH, NORTH CAROLINA 27619 • TELEPHONE: 919/782-5526

Associated Reporting

2 Q YOU TOOK THE CYANIDE OUT.

3 A WELL, WE TOOK SAMPLES OF IT. WE ALWAYS TOOK SAMPLES
4 OF IT AND HAD THEM ANALYZED.

5 Q TO BE---

6 A TO MAKE SURE THAT WE WERE IN COMPLIANCE AND THE
7 SYSTEM WAS WORKING LIKE IT WAS SUPPOSED TO BE
8 WORKING.

9 Q AND IT WAS SUPPOSED TO WORK TO NEUTRALIZE THE
10 CYANIDE?

11 A NEUTRALIZE---RID---DESTROY THE CYANIDE AND CHANGE
12 THE CHROME FROM HEXAVALENT TO TRIVALENT.

13 Q AND APPROXIMATELY HOW LONG WOULD YOU STORE THE
14 FILTER CAKE ON THE PROPERTY BEFORE YOU WOULD TAKE IT
15 OFF TO THE LANDFILL?

16 A THAT PARTICULAR ACCUMULATION WAS PUT THERE FOR ABOUT
17 THREE YEARS.

18 Q SO, THIS WOULD HAVE BEEN, SAY, 1974 THROUGH 1977?

19 A SOMEWHERE AROUND---

20 Q 1978?

21 A YEAH, SOMEWHERE AROUND THERE.

22 Q WHAT HAPPENED AFTER THEN? WHAT WAS CHANGED?

23 A THIS MATERIAL---AT THAT TIME, THE STATE WOULD NOT
24 PERMIT US TO MOVE THE MATERIAL OFF OF THE PROPERTY
25 AND ADVISED US TO HOLD IT ON OUR PROPERTY AND TO

2 STORE IT ON THE PROPERTY, WHICH WE DID. THIS IS
3 RALEIGH, NOW, AND I CAN'T REMEMBER THE GUY'S NAME.
4 IF YOU SAY IT, PROBABLY, I CAN REMEMBER IT, BUT I
5 CAN'T RECALL WHO IT WAS; BUT IT WAS THE HEAD GUY IN
6 CHARGE OF THE E.P.A. IN RALEIGH. HE ADVISED US TO
7 HOLD IT ON THE PROPERTY.

8 AND RIGHT BEFORE THE REGULATION COME INTO
9 EFFECT TO WHERE THEY WERE GOING TO START CHECKING
10 US, THE MATERIAL WAS REMOVED, AND WHERE IT WENT TO,
11 I DON'T KNOW. I THINK IT WENT TO G.S.X., BUT I'M
12 NOT ABSOLUTELY SURE. I'D HAVE TO CHECK MY MANIFEST
13 IN ORDER TO FIND OUT, BUT I DON'T HAVE COPIES OF
14 THOSE.

15 Q OKAY. DID YOU---DID THERE COME A TIME WHERE---WELL,
16 AFTER THE REGULATIONS CAME INTO EFFECT, DO YOU MEAN
17 R.C.R.A.? WAS THAT WHAT YOU WERE REFERRING TO, OR
18 DO YOU KNOW?

19 A RIGHT PRIOR TO THAT, I THINK, IS WHEN IT WAS. AND
20 AFTER IT WAS CLEANED UP, ALL OF THIS MATERIAL WAS---
21 ALL OF THIS AREA AROUND HERE, THE GROUND WAS TESTED
22 IN HERE AND, ALSO, IN HERE.

23 Q DO YOU REMEMBER WHAT YEAR THAT WAS?

24 A I WOULD HAVE TO GUESS IN 1977. NO, I DON'T, NOT
25 EXACTLY---THE DATE.

2 Q WHO SUPERVISED THAT TESTING?

3 A I DID.

4 Q WHO DID YOU HAVE DO THE TESTING?

5 A WE WERE HAVING TESTING DONE BY TWO PEOPLE. I'M NOT
6 SURE IT WAS THAT EXACT TIME, BUT THERE WAS A PRIVATE
7 LABORATORY HERE IN WINSTON-SALEM THAT WE WERE HAVING
8 TESTING DONE BY THEM AND, ALSO, R&A LABORATORIES.
9 AND R&A POSSIBLY COULD HAVE DONE THAT TESTING. I'M
10 NOT SURE.

11 Q DO YOU REMEMBER THE NAME OF THE PRIVATE LAB IN
12 WINSTON?

13 A NO. BUT IT WAS OFF OF STRATFORD ROAD, OUT CLOSE TO
14 THE MALL, BUT I DON'T RECALL THE NAME OF IT.

15 Q WHAT DID YOU HAVE THEM TEST FOR?

16 A CYANIDE, HEAVY METALS.

17 Q WHAT---DO YOU RECALL WHAT YOU FOUND IN TERMS OF THE
18 HEAVY METALS?

19 A NO.

20 Q DO YOU REMEMBER WHAT YOU WERE LOOKING FOR?

21 A WE WAS LOOKING FOR CYANIDE, CHROME, LEAD, POSSIBLY
22 CADMIUM. AND AT THAT TIME, WE DIDN'T HAVE A
23 REGULATION ON THE ZINC, SO I WOULDN'T BE CHECKING
24 FOR THAT.

25 Q WERE YOU---AND YOU DON'T REMEMBER WHAT THE TESTS

2 SHOWED?

3 A NO, I CAN'T TELL YOU. ALL I RECALL IS THAT IT WAS
4 ---YOU KNOW, IT MET THE REQUIREMENTS AT THAT TIME.

5 Q BUT YOU DON'T KNOW WHAT THEY WERE?

6 A I DON'T KNOW WHAT THEY WERE. I CAN'T TELL YOU WHAT
7 THOSE REQUIREMENTS WERE BACK IN THOSE DAYS.

8 Q WHO WAS ADVISING YOU ON WHAT THE REQUIREMENTS WERE?

9 A WELL, I WAS LOOKING IT UP IN THE---I'M SURE I WAS
10 LOOKING IT UP IN THE E.P.A. REQUIREMENTS. YOU SEE,
11 OWENS ENGINEERING COMPANY, OUT OF MILAN, TENNESSEE,
12 WAS ACTUALLY INVOLVED IN THIS WASTE TREATMENT
13 FACILITIES HERE. AND I HAD GONE THROUGH A HISTORY
14 WITH THEM ON THE WASTE WATER TREATMENT, AND WE WERE
15 TRYING TO GET THIS INTO THE SAME REQUIREMENTS AS THE
16 WATER TREATMENT WAS REQUIRED. THAT'S WHAT WE WERE
17 SHOOTING FOR. BUT WHAT THOSE REQUIREMENTS WERE AT
18 THIS TIME, I COULDN'T TELL YOU.

19 Q WAS---

20 A BUT I DO KNOW THAT'S WHAT WE WERE TRYING TO GET, WAS
21 THE WASTE WATER---OR THE SAME THING THAT WOULD BE
22 REQUIRED OF THE WASTE WATER TO JUST DISCHARGE IT.

23 Q INTO THE CITY SEWER?

24 A THAT'S RIGHT.

25 Q AND DO YOU REMEMBER WHETHER IT MET THAT STANDARD?

2 A IT DID.

3 Q HOW MANY SAMPLES DID YOU TAKE?

4 A I DON'T KNOW.

5 Q DO YOU KNOW WHERE YOU TOOK THEM?

6 A I TOOK THEM IN THIS VICINITY HERE AND, ALSO, IN THIS
7 VICINITY OVER HERE.

8 Q WAS ANY SOIL REMOVED AS PART OF THAT PROCESS?

9 A NOTHING OTHER THAN APPROXIMATELY SIX INCHES OF THE
10 SOIL, SOMETHING LIKE THAT.

11 Q AND HOW FAR DOWN DID YOU TEST, OR SAMPLE, I GUESS I
12 SHOULD SAY?

13 A THERE WAS SURFACE TESTING AS FAR AS THE SOIL WHERE
14 THE MATERIAL HAD BEEN LAYING.

15 Q OKAY. SO, YOU DID THIS SURFACE TEST AND, THEN, YOU
16 REMOVED ABOUT SIX INCHES OF SOIL. IS THAT THE
17 SEQUENCE?

18 A NO. IN CLEANING IT UP, YOU WOULD CLEAN UP
19 APPROXIMATELY SIX INCHES UNDERNEATH OF IT.

20 Q OH, OKAY.

21 A AND IT WAS JUST A NORMAL PRACTICE OF THE BULLDOZER
22 TO MAKE SURE YOU JUST GATHERED IT ALL UP. THEN,
23 YOU---AND, THEN, YOU WOULD DO THE TEST.

24 Q DID YOU---AND WHEN DID YOU DO THIS? WHEN DID YOU
25 REMOVE THOSE SLUDGE PILES?

2 A I DON'T RECALL THE EXACT DATE. SOMEWHERE AROUND
3 1977, IS WHAT I'D SAY, BUT I DON'T KNOW EXACTLY.

4 Q DID THE COMPANY, THEREAFTER, HAVE OCCASION TO STORE
5 SLUDGES OUT THERE?

6 A NO.

7 Q WHAT'D YOU DO AFTER THAT, WITH THE SLUDGES FROM THE
8 WASTE TREATMENT SYSTEM?

9 A PUT IT IN A CONTAINER ALONG THE WASTE TREATMENT
10 FACILITIES. IT WAS IN CONTAINERS AND IT WAS TEN
11 FEET WIDE AND TWENTY FEET LONG AND FIVE FEET DEEP---
12 METAL CONTAINER.

13 Q WHAT DID YOU DO WITH THE TEST RESULTS FROM THE SOIL
14 TESTING THAT YOU---

15 A IT WAS LEFT IN MY FILING CABINET AT THE PLANT WHEN I
16 LEFT.

17 Q WHAT KIND OF FILE WAS IT CALLED? WHAT WAS IT
18 CALLED?

19 A SOME OF IT WAS FILED---IT COULD HAVE BEEN FILED
20 UNDER "G.S.X." IT COULD HAVE BEEN FILED UNDER
21 "E.P.A.," AND IT COULD HAVE BEEN FILED UNDER "SOIL
22 SAMPLE TEST." THAT WAS IN MY FILE OUT IN THE---IN
23 THE OFFICE ADJACENT TO THE TOOL ROOM, AT THAT TIME,
24 IN THE BUTLER BUILDING. AND ALSO, THERE WAS
25 ADDITIONAL INFORMATION IN THE ELECTRICAL CHEMIST'S

2 A I'M SURE HE DID, YES.

3 Q HE WORKED IN THE MAINTENANCE AREA. IT WASN'T ROYCE
4 BOLES?

5 A ROYCE BOLES WOULD NOT HAVE DONE IT. HE WASN'T A
6 WELDER. HE DOES PATCH WELDING. IT WOULD HAVE
7 EITHER BEEN---I WOULD ESTIMATE---I WOULD GUESS THAT
8 IT WOULD HAVE BEEN JAMES CREESON, BUT I DON'T KNOW
9 THAT FOR SURE. I---I DON'T RECALL. AS I SAID
10 BEFORE, I DON'T RECALL EXACTLY WHO DID IT.

11 Q DID YOU REPORT THE---WELL, STRIKE THAT AND LET ME
12 BACK UP.

13 WHY DID YOU CLEAN UP THE SLUDGE PILE?

14 A BECAUSE I KNEW IT WAS GOING TO BE OUR RESPONSIBILITY
15 IN LATER YEARS IN ORDER TO TRY TO MAINTAIN A CLEAN
16 ENVIRONMENT. STEWART-WARNER EMPHASIZED THAT WE
17 MAINTAIN A CLEAN ENVIRONMENT IN THE ENTIRE TIME OF
18 THE OPERATION.

19 Q DID SOMEBODY TELL YOU TO CLEAN IT UP?

20 A NORMALLY, THEY WOULD NOT HAVE. I USUALLY WOULD TAKE
21 IT ON MY OWN TO DO. I'M NOT SAYING THAT SOMEONE
22 DIDN'T. IT COULD HAVE BEEN THAT WES KILEY SUGGESTED
23 THAT WE CLEAN IT UP. I---BUT I DON'T THINK THAT
24 HAPPENED. I THINK---I THINK I HAD TOOK THE
25 INITIATIVE IN ORDER TO CLEAN IT UP.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION

CIVIL ACTION NO. 91-CV-00034

ILCO-UNICAN CORPORATION, A)
NORTH CAROLINA CORPORATION,)

PLAINTIFF,)

v.)

STEWART-WARNER CORPORATION, A)
VIRGINIA CORPORATION, AND)
STEWART-WARNER BASSICK-SACK)
CORPORATION, A DELAWARE)
CORPORATION,)

DEFENDANTS.)

POST OFFICE BOX 17418 • RALEIGH, NORTH CAROLINA 27619 • TELEPHONE: 919/782-5526

Associated Reporting

DEPOSITION

OF

ISAAC D. BLAKLEY

VOLUME TWO

AT GREENSBORO, NORTH CAROLINA
FEBRUARY 20, 1992
9:40 A.M.

REPORTED BY: TRICIA ZUBLIONIS

COPY

2 FOR WASTE TREATMENT OF THE SLUDGE WAS BUILT?

3 MS. GIBBONS: OBJECTION.

4 A ARE YOU TALKING ABOUT---WELL, BE A LITTLE MORE
5 SPECIFIC IN THE BARRELS YOU'RE TALKING ABOUT.

6 Q (BY MR. BUTLER) I'M TALKING WHEN THE---I'M TALKING
7 ABOUT THESE AREAS THAT YOU'VE MARKED AS SLUDGE
8 AREAS.

9 A OH, THE SLUDGE AREA HERE?

10 Q RIGHT. AND YOU ALSO TALKED ABOUT, AT SOME POINT, A
11 ---I BELIEVE IT WAS LIKE A TEN-BY-FIVE-BY-TWENTY BIN
12 BEING BUILT FOR WASTE TREATMENT SLUDGE TO BE PUT
13 INTO.

14 A WELL, BEFORE THIS WAS MOVED---I DO KNOW BEFORE THIS
15 WAS MOVED AND FOLLOWING THE REMOVAL OF THIS SLUDGE,
16 THAT THE CONTAINER WAS BUILT, AND WE PUT THE SLUDGE
17 IN THE CONTAINER AFTER THIS WAS REMOVED.

18 Q OKAY. THE CONTAINER WAS BUILT AFTER THE SLUDGE WAS
19 REMOVED?

20 A NO, I'D SAY BEFORE IT. I'D SAY BEFORE, JUST RIGHT
21 BEFORE, BECAUSE WE STARTED PUTTING THE SLUDGE IN THE
22 CONTAINER. THEN, WE POSSIBLY GOT RID OF THIS.

23 Q SO, IT WAS---

24 A THAT WAS THE WAY THAT IT HAD TO HAVE OCCURRED.

25 Q AROUND THE SAME TIME, THOUGH, WITHIN A YEAR?

2 A YES, I---

3 MS. GIBBONS: OBJECTION.

4 A I WOULDN'T HAVE CONTINUED TO PUT SLUDGE DOWN HERE IF
5 I'D HAVE HAD A CONTAINER UP THERE.

6 Q (BY MR. BUTLER) OKAY. BUT YOUR RECOLLECTION IS
7 THAT THAT SLUDGE WAS REMOVED AROUND THE TIME THIS
8 CONTAINER WAS BUILT?

9 MS. GIBBONS: OBJECTION.

10 A IT WOULD HAVE TO BE AROUND THAT TIME.

11 MR. BUTLER: LET ME HAVE THIS MARKED AS
12 DEFENDANTS' EXHIBIT NO. 1.

13 (THEREUPON, THE DOCUMENT REFERRED TO ABOVE WAS
14 MARKED AS DEFENDANTS' DEPOSITION EXHIBIT NO. 1,
15 BLAKLEY DEPOSITION, FOR IDENTIFICATION.)

16 Q (BY MR. BUTLER) I WONDER IF YOU WOULD TAKE A LOOK
17 AT PAGES SEVENTEEN AND EIGHTEEN. WELL, FIRST LET ME
18 ASK YOU THIS, DEFENDANTS' EXHIBIT NO. 1, DO YOU
19 RECOGNIZE THIS EXHIBIT?

20 A IT'S VERY SIMILAR TO A REPORT THAT I'VE FILLED OUT
21 BEFORE AND, ALSO, IT HAS MY WRITING ON THE FRONT OF
22 IT---MY PRINTING.

23 Q TAKE A LOOK AT PAGE TWENTY-EIGHT.

24 (THEREUPON, THE WITNESS COMPLIES.)

25 A YES.

2 Q IS THAT YOUR SIGNATURE?

3 A YES, IT IS.

4 Q AND IS THAT THE DATE THAT YOU FILLED OUT THIS
5 REPORT?

6 A I'M SURE IT WAS.

7 Q NOW, TURN YOUR ATTENTION TO PAGES SEVENTEEN AND
8 EIGHTEEN.

9 A OKAY.

10 Q DO YOU SEE THESE PAGES CONTAIN QUESTIONS ABOUT A
11 DRUM OR A TANK?

12 A I DO.

13 Q IS THIS THE---IN LOOKING AT THIS, DO YOU RECALL
14 WHETHER THESE---WHAT YOU HAVE DESCRIBED IN RESPONSE
15 TO THESE QUESTIONS REFERS TO THE TANK IN WHICH WASTE
16 TREATMENT SLUDGE WAS STORED?

17 A THAT'S CORRECT.

18 Q TAKE A LOOK AT PAGE EIGHTEEN. DOES WHAT YOU HAVE
19 WRITTEN AS INSTALLATION YEAR NEXT TO "TANK" ON PAGE
20 EIGHTEEN REFRESH YOUR RECOLLECTION AS TO THE YEAR
21 THE WASTE TREATMENT SLUDGE STORAGE BIN WAS
22 CONSTRUCTED?

23 A I WOULD HAVE---I WOULDN'T HAVE PUT IT ON THERE IF IT
24 HADN'T HAVE BEEN. I'M SURE THAT WAS THE YEAR; AND
25 THERE AGAIN, THIS INFORMATION IS IN MY FILES AT THE

2 PLANT WHERE THE TANK WAS FABRICATED, BECAUSE I NEVER
3 FAILED TO THROW THOSE AWAY.

4 Q AND WHAT YEAR WAS THE TANK---

5 A I MEAN, I NEVER THREW ONE OF THEM AWAY. I'D SAY IT
6 THAT WAY.

7 Q WHAT YEAR WAS THE TANK INSTALLED?

8 A 1978.

9 MR. BUTLER: LET ME HAVE THIS MARKED AS
10 DEFENDANTS' EXHIBIT NO. 2.
11 (THEREUPON, THE DOCUMENT REFERRED TO ABOVE WAS
12 MARKED AS DEFENDANTS' DEPOSITION EXHIBIT NO. 2,
13 BLAKLEY DEPOSITION, FOR IDENTIFICATION.)

14 Q (BY MR. BUTLER) IF YOU WOULD TAKE A LOOK THROUGH
15 DEFENDANTS' EXHIBIT NO. 2, AND PARTICULARLY PAGE
16 THIRTY-SEVEN, AND TELL ME IF YOU RECOGNIZE THIS
17 DOCUMENT.

18 A YEAH, THAT'S MY SIGNATURE, ON OCTOBER 6, 1982.

19 Q AND SO, THIS IS A FORM THAT YOU FILLED OUT AT THAT
20 TIME?

21 A IT IS.

22 Q TAKE A LOOK AT PAGE TEN OF THE DOCUMENT.

23 (THEREUPON, THE WITNESS COMPLIES.)

24 A OKAY.

25 Q YOU SEE THERE ARE SOME CATEGORIES FOR HAZARDOUS

2 WASTE THAT WAS IN EXISTENCE DURING 1981?

3 A YES.

4 Q AND YOU MARKED CATEGORIES FOR HAZARDOUS WASTE AND
5 TREATMENT TANKS, STORAGE CONTAINERS AND STORAGE
6 TANKS. DO YOU SEE THAT?

7 A YES.

8 Q YOU DID NOT MARK ANY HAZARDOUS WASTE IN 1981 IN
9 STORAGE PILES, OR IN WASTE PILES, DID YOU?

10 A THAT'S CORRECT.

11 Q DOES THAT INDICATE TO YOU THAT THERE WERE NO WASTE
12 PILES OUTSIDE OF CONTAINERS WITH HAZARDOUS WASTE,
13 DURING 1981?

14 A THAT'S CORRECT.

15 MS. GIBBONS: OBJECTION.

16 Q (BY MR. BUTLER) AND HAVING REVIEWED THIS DOCUMENT,
17 IS THAT WHAT YOUR RECOLLECTION IS?

18 MS. GIBBONS: OBJECTION.

19 A YES.

20 Q (BY MR. BUTLER) THESE QUESTIONNAIRES THAT YOU
21 FILLED OUT, MARKED AS EXHIBIT NOS. 1 AND 2, WAS IT
22 YOUR RESPONSIBILITY DURING YOUR---AT THIS TIME WITH
23 STEWART-WARNER, TO RESPOND TO SUCH GOVERNMENTAL
24 INQUIRIES?

25 A THAT'S CORRECT.



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION

CIVIL ACTION NO. 91-OV-00034

ILCO-UNICAN CORPORATION,
A NORTH CAROLINA CORPORATION,

Plaintiff

versus

STEWART-WARNER CORPORATION,
A VIRGINIA CORPORATION,
and
STEWART-WARNER BASSICK-SACK CORPORATION
A DELAWARE CORPORATION,

Defendants.

A P P E A R A N C E S:

MR. JOHN J. BUTLER - for Defendants
MR. SAMUEL O. SOUTHERN - for Plaintiff

DEPOSITION OF CRESCENZO NOTTURNO, on February 13, 1992
in Montreal, Quebec, Canada

C.L. KLEIN, Official Court Reporter
6550 Sherbrooke Street West #705
Montreal, Quebec
H4B 1N6
514-481-2623

COPY

NOTTURNO

DIRECT/BUTLER

5 facility, and that was it.

6 Q. What happened though during that first year?

7 A. Well --

8

9 BY MAITRE SOUTHERN:

10 I object to that. You can ask him if he knows
11 what --

12

13 BY MR. BUTLER:

14 Q. What were your job responsibilities as
15 General Manager during that first year?

16 A. Again, like I just said, my primary reason
17 for being there was from a marketing
18 standpoint, not -- not to run the facility,
19 but to bring in sales into the building.

20 Q. I understand that that was your -- that was
21 the primary reason for you going down there,
22 but my question is not what was the plan for
23 your being down there, but what were your
24 actual responsibilities while you were down
25 there during your first year?

26 A. Those were my responsibilities.

27 Q. Just sales?

NOTTURNO

DIRECT/BUTLER

5 A. Pretty much. I was given the title, but the
6 people did not necessarily report to me. I
7 was the only one from Montreal, so they
8 reported to me only for communication
9 reasons, but other than that my
10 responsibility was sales.

11 Q. Did Ilco-Unican bring in anyone else from its
12 operation down to the Winston-Salem facility?

13 A. To move there?

14 Q. Immediately after closing, right.

15 A. No. I was the only one.

16 Q. Did Ilco-Unican then hire on the labour force
17 and management that had been running the
18 facility when Stewart-Warner --

19 A. Some of the people, yes. Most of the people.

20 Q. Most of the people?

21 A. Yes.

22 Q. Can you give me a rough percentage
23 approximation of how many people stayed on
24 after the sale?

25 A. Again, my primary responsibility was
26 marketing, so we really only let one
27 individual go inside, who was Sales Manager,

NOTTURNO

DIRECT/BUTLER

5 which I didn't need, and we let some people
6 on the outside go, marketing people also --
7 sales people, commission people.

8 Q. Insofar as the people who were managing
9 manufacturing operations, did they stay the
10 same?

11 A. They all stayed, yes.

12 Q. When you first -- when Ilco-Unican first took
13 over the facility, were you aware that G.S.X.
14 was undertaking a clean-up of some spill
15 sites and some drum sites on the site?

16 A. I found that out when I moved there --

17 Q. Okay.

18 A. -- when I saw what they were doing. That was
19 it.

20 Q. Did you ever talk to anyone about what they
21 were doing?

22 A. I was interested in knowing what they were
23 doing, sure.

24 Q. Who did you talk to?

25 A. Ike Blakley, who was really the one
26 overseeing the clean-up.

27 Q. Did you talk to Jim Stanley?

NOTTURNO

DIRECT/BUTLER

5 A. No.

6 Q. What was the production level of furniture
7 hardware at the Ilco-Unican Winston-Salem
8 facility in 1988 and 1989?

9 A. In 88 it was six million dollars. 89 it was
10 a little over seven million dollars.

11 Q. So actually production increased?

12 A. Increased, yes.

13 Q. Do you recall how that compared to production
14 the previous couple of years under
15 Stewart-Warner?

16 A. I have no idea.

17

18 *Exhibit Thirty-two: Memorandum dated May 24,
19 1989 from Enzo Notturmo to Henry Marco re April
20 Market, 1989.

21

22 BY MR. BUTLER:

23 Q. Let me show you Exhibit thirty-two, which --
24 this is a memo from you to Henry Marco; is it
25 not?

26 A. Yes.

27 Q. That indicates that certain customers were

NOTTURNO

DIRECT/BUTLER

5 However, it was the market and our pricing
6 which were not competitive at that market,
7 but we work from market to market, and every
8 six months there is a new market. It's a new
9 world, and it's a new year.

10 Q. Did the pricing that was not competitive at
11 that market, did that problem improve later
12 on?

13 A. Yes.

14 Q. With respect to furniture hardware
15 manufacturing in Winston-Salem?

16 A. No.

17 Q. What was the reason for moving or for
18 discontinuing the manufacture of furniture
19 hardware in Winston-Salem?

20 A. Consolidation. We had ample facility or room
21 in Montreal, production capacity, and we
22 decided to go with one facility, and it was
23 the Montreal facility.

24 Q. Do you know how profitable the Winston-Salem
25 furniture hardware manufacturing business was
26 for Ilco-Unican?

27 A. No.

NOTTURNO

DIRECT/BUTLER

- 5 Q. Why were those two businesses consolidated?
6 Was that the plan when Ilco-Unican purchased
7 the Winston-Salem facility?
- 8 A. Consolidation was a thought when we purchased
9 Winston-Salem, yes.
- 10 Q. And what was the idea then? That things
11 would be consolidated in Winston-Salem?
- 12 A. Initially it was thought that it would be
13 consolidated in Winston, yes.
- 14 Q. Why was that initial plan abandoned?
- 15 A. Because we were more competitive producing
16 the product in Montreal.
- 17 Q. Why were you more competitive producing the
18 product in Montreal?
- 19 A. We were more automated in Montreal.
- 20 Q. Did you expect when Ilco-Unican purchased the
21 Winston-Salem facility to be able to be as
22 competitive in Winston-Salem as in Montreal?
- 23 A. We were not sure, because when we acquired it
24 we did not know what kind of equipment they
25 had. I think I said before we had never been
26 in that facility, nor did we ever have any
27 contact with them. So we did not know how

NOTTURNO

DIRECT/BUTLER

5 competitive we would be.

6 Q. Why did Ilco-Unican spend the money to go
7 ahead and buy the facility then?

8

9 BY MR. SOUTHERN:

10 Objection. If he knows the answer to that --

11

12 BY MR. BUTLER:

13 Q. You can answer.

14 A. I don't know.

15 Q. Did you think it was a wise investment?

16 A. I don't know. Are you asking me before or
17 after the fact?

18 Q. Well, now after the fact do you have an
19 opinion on that?

20 A. It was a bad investment.

21 Q. And that is because the furniture hardware
22 manufacturing business just didn't work out
23 in the Winston-Salem facility. Is that
24 right?

25 A. Yes.

26

27

K

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
3 WINSTON-SALEM DIVISION
4 CIVIL ACTION NUMBER: 6:91-CV-00034

4 ILCO-UNICAN CORPORATION)
5 a North Carolina Corporation,)

6 Plaintiff,)

7 v.)

8 STEWART-WARNER CORPORATION,)
9 a Virginia Corporation, and)
10 STEWART-WARNER BASSICK-SACK)
11 CORPORATION, a Delaware)
12 Corporation,)

13 DEFENDANTS.)

14 DEPOSITION

15 OF

16 STEVE PHIBBS

18 AT RALEIGH, NORTH CAROLINA
19 APRIL 27, 1992 - 10:00 A.M.

20 AT WINSTON-SALEM, NORTH CAROLINA
21 APRIL 29, 1992 - 9:30 A.M.

22 REPORTED BY: CAROLYN Y. HALL & ASSOCIATES
23 2551 ALBEMARLE AVENUE
24 RALEIGH, NORTH CAROLINA 27

25 TELEPHONE: (919) 231-4164
(919) 231-431

1 MR. PHIBBS

PAGE 14

2 A. YES, I AM.

3 Q. AND THAT SITE WAS PREVIOUSLY OWNED AND OPERATED BY
4 STEWART-WARNER CORPORATION. IS THAT RIGHT?

5 A. TO MY KNOWLEDGE, YES.

6 Q. HOW LONG HAVE YOU BEEN INVOLVED IN -- WELL, LET ME
7 ASK THIS FIRST. HAVE YOU UNDERTAKEN HAZARDOUS
8 WASTE INSPECTIONS AT THAT SITE?

9 A. I HAVE.

10 Q. HOW LONG HAVE YOU BEEN INVOLVED IN UNDERTAKING
11 HAZARDOUS WASTE INSPECTIONS AT THAT SITE?

12 A. SOMETIME IN THE EARLY '80'S, EITHER '81 OR '82,
13 I ORIGINALLY STARTED CONDUCTING INSPECTIONS
14 THERE.

15 Q. WHEN WAS THE EFFECTIVE DATE OF THE FEDERAL AND
16 NORTH CAROLINA HAZARDOUS WASTE LAWS?

17 A. WELL, THE FEDERAL RESOURCE CONSERVATION AND
18 RECOVERY ACT WAS PASSED IN 1976, BUT NORTH
19 CAROLINA DID NOT START THE ACTUAL INSPECTIONS
20 UNTIL, I BELIEVE IT WAS 1980 OR EARLY '81.
21 SO, I THINK IT WAS THE FALL OF '80 THAT WE
22 ACTUALLY STARTED CONDUCTING HAZARDOUS WASTE
23 INSPECTIONS.

24 Q. AFTER THE TIME YOU STARTED THOSE INSPECTIONS, WHAT
25 WAS THE STATUS OF THE FACILITY AT THAT TIME?

1 MR. PHIBBS

PAGE 15

2 A. I BELIEVE, INITIALLY, THE STATUS OF THE FACILITY,
3 THEY WERE -- THEY OBTAINED AN EPA IDENTIFICATION
4 NUMBER AS A HAZARDOUS WASTE GENERATOR AND ALSO AS
5 A STORAGE FACILITY. I BELIEVE THEY WERE IN THE
6 CATEGORY OF A TSD FACILITY INITIALLY.

7 Q. AND TSD IS TREATMENT AND STORAGE DISPOSAL?

8 A. CORRECT.

9 Q. WAS THAT INITIAL CATEGORIZATION UNDER THE INTERIM
10 STATUS?

11 A. THAT'S CORRECT. RIGHT, THAT'S CORRECT.

12 Q. WOULD THEIR STATUS AS A TSD FACILITY OR A
13 GENERATOR AFFECT THE FREQUENCY OF YOUR
14 INSPECTIONS?

15 A. YES, IT WOULD.

16 Q. HOW SO?

17 A. TSD FACILITIES ARE INSPECTED TWICE A YEAR AT A
18 MINIMUM. AND LARGE GENERATORS, IF THEY WERE A
19 GENERATOR ONLY, THEY WOULD ONLY BE INSPECTED ONCE
20 A YEAR.

21 Q. OKAY. DURING THE TIME STEWART-WARNER OPERATED THE
22 FACILITY AND HAD INTERIM STATUS AS A TSD FACILITY
23 HOW OFTEN WOULD YOU INSPECT THE SITE?

24 A. TWICE A YEAR.

25 Q. WOULD YOU EVER INSPECT IT MORE OFTEN THAN TWICE A

2 YEAR?

3 A. OFFICIAL INSPECTIONS, PROBABLY I ONLY INSPECTED
4 THE -- USED -- EXCUSE ME -- WENT TO AND CONDUCTED
5 THE TWO INSPECTIONS. IF THERE HAD BEEN -- WE
6 COULD HAVE MADE, YOU KNOW, VISITS OR WALKTHROUGHS
7 WITHOUT ACTUALLY CONDUCTING INSPECTIONS. SO, I
8 WAS PROBABLY THERE MORE THAN TWICE A YEAR BUT ONLY
9 OFFICIALLY CONDUCTED TWO INSPECTIONS A YEAR.

10 Q. DO YOU RECALL WHEN STEWART-WARNER'S STATUS AT THAT
11 SITE CHANGED FROM INTERIM STATUS TSD TO A
12 GENERATOR ONLY?

13 A. YES.

14 Q. WHEN DID THAT OCCUR?

15 A. I BELIEVE OFFICIALLY WE STARTED -- IF I REMEMBER
16 CORRECTLY, WE STARTED GOING THROUGH THE STEPS IN
17 '86, I BELIEVE IT WAS. AND I THINK THEY
18 OFFICIALLY CHANGED THEIR STATUS IN '87 TO A
19 GENERATOR ONLY.

20 Q. AND WERE THE STEPS TAKEN TO CHANGE THAT STATUS
21 CALLED CLOSURE? IS THAT THE GENERAL TERM?

22 A. THAT'S---

23 MR. JOHNSON: OBJECT TO THE FORM.

24 MR. BUTLER: YOU CAN ANSWER THE

25 QUESTION.

1 MR. PHIBBS

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2 A. I DON'T KNOW THAT IT ALL WAS, NO.

3 MR. JOHNSON: OKAY. NO FURTHER
4 QUESTIONS.

5 MR. BUTLER: LET'S TAKE A REAL SHORT
6 BREAK. LET'S TRY AN BE BACK WITHIN THREE
7 OR FOUR MINUTES.

8 (THEREUPON, A SHORT
9 BREAK WAS TAKEN.)

10 REDIRECT EXAMINATION BY MR. BUTLER:

11 Q. MR. PHIBBS, I BELIEVE YOU TESTIFIED THAT DURING
12 THE TIME STEWART-WARNER OPERATED UNDER INTERIM
13 STATUS, YOU WENT THERE TWICE A YEAR ON YOUR
14 REGULAR INSPECTION. IS THAT RIGHT?

15 A. THAT'S CORRECT.

16 Q. AND WERE YOUR -- IF THERE WAS A NON-COMPLIANCE
17 ITEM, WOULD YOU THEN CONDUCT A REINSPECTION?

18 A. THAT'S CORRECT.

19 Q. AND WERE THOSE REINSPECTIONS IN ADDITION TO THOSE
20 TWICE-A-YEAR REGULAR INSPECTIONS?

21 A. THAT'S CORRECT. YES.

22 Q. AND INsofar AS YOU CAN RECALL WERE ALL
23 NON-COMPLIANCE ITEMS CORRECTED WHEN YOU
24 REINSPECTED THE PREMISES?

25 A. I BELIEVE THEY ADDRESSED ALL THE ISSUES AND MADE

2 APPROPRIATE CORRECTIONS. YES.

3 Q. I WONDER IF YOU WOULD PLEASE REFER TO PLAINTIFF'S
4 EXHIBIT NUMBER 2. AND IF YOU WOULD REFER TO
5 SUBPART I, WHICH HAS A BATES STAMP NUMBER 2001285,
6 DO YOU RECALL BEING ASKED A QUESTION YESTERDAY
7 ABOUT YOUR CHECK MARK NEXT TO THE CATEGORY UNDER
8 2.a ENTITLED "LEAKAGE"?

9 A. YES.

10 Q. TAKE A LOOK UNDER 3.c, DID YOU MAKE ANY NOTATION
11 CONCERNING VISIBLE EVIDENCE OF LEAKAGE OR
12 CORROSION?

13 A. I DID NOT.

14 Q. WOULD SUCH VISUAL EVIDENCE BE A VIOLATION?

15 A. YES, IT COULD BE. YES.

16 Q. I WONDER IF YOU WOULD REFER TO WHAT IS BATES STAMP
17 NUMBER 2001297.

18 A. OKAY.

19 Q. WHAT DID YOU CONCLUDE DURING THIS SITE VISIT AS TO
20 WHETHER STEWART-WARNER'S USE AND MANAGEMENT OF
21 CONTAINERS WAS IN OR OUT OF COMPLIANCE?

22 A. I CHECKED OFF THAT IT WAS IN COMPLIANCE.

23 Q. DID THE -- THE CHECK MARK NEXT TO THE -- ON PAGE
24 2001285, SUBPART I -- NEXT TO THE CATEGORY
25 "LEAKAGE," RELATE TO THE POTENTIAL FOR LEAKAGE OR

1 MR. PHIBBS

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2 Q. YOU WERE ASKED SOME QUESTIONS ABOUT RCRA
3 GROUNDWATER MONITORING REQUIREMENTS. DO YOU
4 RECALL THAT?

5 A. WELL, I KNOW WE TOUCHED ON THAT IN ONE OF THE
6 LETTERS, YES.

7 Q. HAVE ANY GROUNDWATER MONITORING REQUIREMENTS BEEN
8 IMPOSED ON STEWART-WARNER BY THE RCRA BRANCH?

9 MR. JOHNSON: OBJECTION.

10 A. NOT THAT I'M AWARE OF, NO.

11 Q. DO YOU RECALL TESTIMONY OVER THE LAST DAY AND
12 TODAY ABOUT SPILLS IN 1982, 1986 AND 1987? DO
13 YOU RECALL THAT?

14 A. YES.

15 Q. WERE ALL OF THOSE SPILLS IN THE SAME GENERAL
16 AREA?

17 A. YES, WITH THE EXCEPTION OF ONE THAT -- THAT
18 TRAVELED IN A LITTLE BIT DIFFERENT DIRECTION, BUT
19 IT STILL DISCHARGED DOWN ONTO THE RAILROAD
20 PROPERTY, OR ALONG THE RAILROAD TRACK AS THE
21 OTHER -- PREVIOUS DISCHARGES HAVE.

22 Q. OKAY. WAS THAT ONE OF THE 1987 ONES?

23 A. I BELIEVE SO. I BELIEVE SO.

24 Q. OKAY. I BELIEVE YOU USED THE PHRASE "BELOW
25 HAZARDOUS WASTE LEVELS" ONCE THIS MORNING. DO YOU

1 MR. PHIBBS

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2 Q. SO, WHEN YOU TALKED ABOUT SOMETHING BELOW
3 HAZARDOUS WASTE LEVELS, YOU MEAN SOMETHING THAT
4 DOES NOT COME ABOVE THOSE REGULATORY LEVELS UNDER
5 THOSE TESTS?

6 A. THAT'S CORRECT.

7 Q. DO YOU RECALL BEING ASKED SOME QUESTIONS ABOUT THE
8 CONDITIONS OF THE HOLDING TANKS THIS MORNING?

9 A. YES.

10 Q. DO YOU KNOW WHETHER ANY SPILLS RESULTED FROM THE
11 CONDITION OF THE HOLDING TANK YOU WERE REFERRING
12 TO THIS MORNING?

13 A. I DON'T KNOW SPECIFICALLY OF A SPILL THAT WAS
14 ASSOCIATED WITH THAT---

15 Q. DO YOU KNOW---

16 A. ---WITH THOSE TANKS.

17 Q. ---WHETHER ILCO UNICAN CONTINUED TO USE THAT TANK
18 FOR A TIME?

19 A. I'M NOT SURE IF THEY DID OR IF THEY DID NOT USE
20 THEM.

21 Q. DO YOU REMEMBER BEING ASKED SOME QUESTIONS ABOUT
22 WHETHER THE VERTICAL AND HORIZONTAL EXTENT OF
23 CONTAMINATION AT THE SPILL SITES WAS ACCURATELY
24 DONE, OR DONE WELL?

25 A. RIGHT.

1 MR. PHIBBS

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2 Q. BY THE TIME THE LETTER DATED NOVEMBER 16, 1988,
3 AND MARKED AS DEFENDANT'S EXHIBIT 21, WAS WRITTEN,
4 WERE YOU SATISFIED THAT THE HORIZONTAL AND
5 VERTICAL EXTENT OF CONTAMINATION HAD BEEN PROPERLY
6 ELIMINATED?

7 A. I CAN ONLY SAY -- RESPOND TO THAT BY SAYING YES.

8 Q. AT THE TIME THIS LETTER WAS WRITTEN, WAS YOUR
9 MEMORY ABOUT HOW THAT WAS ACTUALLY DETERMINED AND
10 WHAT YOU OBSERVED AT THE SITE BETTER THAN IT IS
11 TODAY?

12 A. I DON'T KNOW. I JUST REMEMBER GOING TO THE SITE
13 ON SEVERAL DIFFERENT OCCASIONS AND DEALING WITH
14 MR. DeVORE AND DEALING WITH THE CONTRACTOR, THE
15 CONSULTANT---

16 Q. JIM CHESHIRE?

17 A. ---JIM CHESHIRE. AND I REMEMBER DISCUSSING
18 SAMPLES, COLLECTION OF SAMPLES, LOCATION OF
19 SAMPLES, METHODS OF ANALYSIS, THINGS OF THAT
20 NATURE.

21 Q. WOULD YOU SAY THAT YOUR MEMORY OF THAT WAS CLEARER
22 IN NOVEMBER OF 1988 THAN IT IS TODAY?

23 MR. JOHNSON: OBJECT TO THE FORM.

24 A. DEFINITELY. YES, DEFINITELY.

25 Q. TAKE A LOOK AT WHAT WAS INTRODUCED AS -- I THINK

1 MR. PHIBBS

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2 IT WAS PLAINTIFF'S EXHIBIT 16. IT MAY BE
3 DEFENDANT'S EXHIBIT 16 -- DEFENDANT'S EXHIBIT 16.
4 THAT'S RIGHT.

5 MR. JOHNSON: IS THAT THE ONE YOU'RE
6 REFERRING TO?

7 MR. BUTLER: I DON'T WANT TO SEARCH
8 THROUGH MY FILE HERE.

9 Q. (BY MR. BUTLER) DO YOU SEE THE SECOND SENTENCE
10 REFERRING TO THE INTERIM PRIMARY DRINKING WATER
11 STANDARDS?

12 A. YES.

13 Q. DO YOU SEE THE REFERENCE TO THOSE STANDARDS AS A
14 GUIDELINE FOR CLEANUP LEVELS?

15 A. YES.

16 Q. WAS THE ACTUAL CLEANUP LEVEL -- THE FINAL CLEANUP
17 LEVEL DETERMINED -- WAS THAT DETERMINATION MADE
18 AFTER STEWART-WARNER UNDERTOOK EXCAVATION?

19 MR. JOHNSON: OBJECT TO THE FORM.

20 A. WAS THE CLEANUP LEVEL---

21 Q. RIGHT.

22 A. ---DETERMINED AFTER THEY BEGAN EXCAVATION?

23 Q. RIGHT. IN OTHER WORDS, AS THEY EXCAVATED, WOULD
24 THERE BE FURTHER DISCUSSION ABOUT WHEN THEY COULD
25 STOP EXCAVATION AND START BACK?

2 MR. JOHNSON: OBJECT TO THE FORM.

3 A. I'M NOT REAL SURE ON THE TIMING OF THE LETTER
4 OR -- BUT SOMEWHERE EARLY IN THE PROCESS, IT WOULD
5 BE DETERMINED WHAT THE CLEANUP LEVELS WERE; AND IF
6 SOMEONE NEEDS TO OR WANTS TO GO AHEAD AND BEGIN
7 THE CLEANUP, CERTAINLY WE DON'T HAVE ANY
8 OBJECTIONS TO THAT---

9 Q. UH-HUH (YES).

10 A. ---WE DON'T WANT TO HAMPER THEM FROM GOING IN AND
11 INITIATING A CLEANUP. BUT SOMEWHERE IN THE
12 PROCESS, THERE WOULD HAVE TO BE A DETERMINATION
13 MADE AS TO WHEN THE CLEANUP OBVIOUSLY WOULD HAVE
14 BEEN COMPLETED.

15 Q. HAD GONE FAR ENOUGH?

16 A. HAD GONE FAR ENOUGH, RIGHT.

17 Q. AND IN THIS CASE, IF YOU'LL TAKE AT EXHIBIT 18,
18 DO YOU RECALL WHETHER OR NOT THAT DETERMINATION
19 WAS MADE -- AND THEN LOOK AT THE LETTER AS
20 ATTACHMENT 3---

21 A. WOULD YOU ASK THAT AGAIN? I'M SORRY.

22 Q. ALL RIGHT. IN THIS CASE, DO YOU RECALL WHETHER
23 THAT DETERMINATION AS TO WHETHER STEWART-WARNER
24 HAD DUG FAR ENOUGH WAS MADE PERIODICALLY WITH
25 RESPECT TO EACH SECTION THAT WAS REPORTED ON WHERE

1 MR. PHIBBS

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2 EXCAVATION HAD TAKEN PLACE?

3 MR. JOHNSON: OBJECTION.

4 A. WELL, IT WOULD APPEAR THAT CERTAINLY THEY -- THEY
5 HAD -- THEY CONCLUDED THAT IN THEIR LETTER OF
6 REQUEST TO BACKFILL. IT DOES APPEAR THAT THEY
7 WERE GIVEN APPROVALS OR PERMISSION TO BACKFILL
8 THOSE AREAS.

9 Q. AND THAT APPROVAL TO BACKFILL WOULD BE BASED ON
10 THE REPORTS STEWART-WARNER MADE AS TO WHAT
11 RESIDUAL LEVELS REMAIN, IS THAT CORRECT?

12 MR. JOHNSON: OBJECT TO THE FORM.

13 A. THAT'S CORRECT.

14 Q. AND, IN ESSENCE, THE RESIDUAL LEVELS THAT REMAINED
15 WOULD BE THE CLEANUP LEVELS AT THE SITE, WOULDN'T
16 IT?

17 MR. JOHNSON: OBJECT TO THE FORM.

18 A. THEY WOULD HAVE TO BE A MINIMUM AT THE CLEANUP
19 LEVEL, OR BELOW.

20 Q. OKAY. YOU MENTIONED THAT THE HAZARDOUS WASTE
21 COMPLIANCE UNIT -- THAT THERE WERE TWO PEOPLE THAT
22 YOU MENTIONED IN THAT: DOUG HOLYFIELD AND GARY
23 BABB. DO YOU RECALL THAT?

24 A. YES.

25 Q. DID GARY BABB ACTUALLY HEAD THE UNIT?

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION

ILCO-UNICAN CORPORATION,)
a North Carolina corporation,)

Plaintiff,)

vs.)

STEWART-WARNER CORPORATION,)
a Virginia corporation, and)
STEWART-WARNER BASSICK-SACK)
CORPORATION, a Delaware)
corporation,)

Defendants.)

COPY

No. 6:91-CV-00034

THE DEPOSITION of GEORGE D. WEST, JR., a witness, called by Defendant Stewart-Warner Corporation for examination in the above-entitled cause, pursuant to the Federal Rules of Civil Procedure, taken before me, Lisa R. Knight, CSR-RPR, a Notary Public in and for the County of Peoria and State of Illinois, at 121 West Elm Street, in the City of Canton, County of Fulton, and State of Illinois, on the 21st day of April, A.D. 1992, commencing at 9:00 central time, deposition taking place via telephone call from the Law Offices of Parker, Poe, Adams & Bernstein, One Exchange Plaza, Raleigh, North Carolina.

1 A That it was.

2 Q I wonder if you could explain in a little
3 more detail what heavy buffing actually involved?

4 A Well, heavy buffing, you use a lathe in
5 approximately 1800 RPM; and you use a 14- to a 16-inch
6 buff, which is 82, 96 or 86 ply.

7 And what this does, you use a compound which
8 they call a triple E compound. You apply it to the
9 wheel; and as you buff these parts, it brings it up to a
10 high luster.

11 Are you with me so far?

12 Q I am. Okay. Did you hold the position of
13 supervisor of the heavy buffing operations under both
14 Stewart-Warner and Ilco-Unican?

15 A Yes, I did.

16 Q Did Ilco-Unican continue the heavy buffing
17 operations the entire time you worked there?

18 A Yes. In fact, we expanded on it. We started
19 a second shift.

20 Q You expanded on the heavy buffing operations?

21 A Polishing and buffing. We started a second
22 shift. Yes.

23 Q Did that result in any change in the volume
24 of parts buffed at the Winston-Salem facility after

1 operations?

2 A Right. But it increased tremendously.

3 Q They were increased?

4 A We increased the volume of the usage of the
5 degreaser.

6 Q And that was during the time Ilco-Unican
7 operated --

8 A Right. When they started the second shift.
9 Yeah.

10 Q While you were there, did Ilco-Unican make
11 any changes in the type of solvent it used in the
12 degreaser?

13 A No. At one time I thought I used
14 trichloroethylene; but evidently, with all I've heard,
15 it must have been just perchloroethylene is all I used.

16 Q Perchloroethylene is p-e-r-c-h-l-o-r-o-
17 e-t-h-y-l-e-n-e?

18 A I ought to ask a fourth grader about that.
19 Yeah.

20 Q I'll ask the court reporter to hand you the
21 one page exhibit that has been marked as Defendant's
22 Exhibit 1-West.

23 A Okay.

24 Q Do you have that before you now?

18. Environmental Responsibility. The parties acknowledge that Sellers retained at their own expense a qualified environmental consultant, Research and Analytical Laboratories, Inc., of Kernersville, North Carolina for the purpose of making an environmental assessment of the Property. ~~A copy of the Final Report of Research and Analytical Laboratories, Inc. shall be delivered to Buyer when available, but Sellers do not make any~~ ~~warranties or representations whatsoever concerning it.~~ (C)

WKS
Sellers jointly and severally represent and warrant:

- (a) that, as of the Transfer Day, there exists no notice of the United States Environmental Protection Agency, the North Carolina Department of Human Resources, the North Carolina Department of Environmental Management, or any other Federal, state or local authority of any violation under any existing applicable environmental law or regulation, except as to two (2) spill sites which have been previously disclosed to Buyer; and
 - (b) that SW has contracted with GSX Chemical Services, Inc. of Columbia, South Carolina to perform remedial services to correct the chemical contamination at two (2) spill sites which have been reported to and are being monitored by the North Carolina Department of Human Resources; and
 - (c) that the Sellers will ensure that GSX Chemical Services, Inc. performs the remedial services with all due diligence and without interference with the Buyer's operation of the Bassick-Sack Business, as presently conducted, after the Transfer Day.
 - (d) that following the remedial work to be performed by GSX Chemical Services, Inc., to the satisfaction of the appropriate final authority, whether it be administrative or judicial, the two (2) spill sites on the Property will not contain, and to the knowledge of Sellers' officers and management the remainder of the Property will not contain hazardous waste chemical contaminants existing prior to the Transfer Day at levels which require reporting under any existing applicable environmental law or regulation; and:
- (R)

(e) that should hazardous waste be discovered on the Property, which contaminants existed on the Property prior to the Transfer Day, and whether or not known to the Seller or Sellers, at any time up to three (3) years after the Transfer Day, in such levels that legally require soil and/or groundwater remedial services, and the actual reasonable costs of such services are in excess of One Hundred Fifty Thousand (\$150,000.00) Dollars then Sellers shall:

(i) at their expense, contract directly for the required remedial services after the Buyer has either paid the first One Hundred Fifty Thousand (\$150,000.00) Dollars or has given Sellers adequate assurances that it will pay the first One Hundred Fifty Thousand (\$150,000.00) Dollars; or

(ii) at Sellers' election, reimburse Buyer for its expenses in excess of One Hundred Fifty Thousand (\$150,000.00) Dollars incurred in contracting for the remedial services. Buyer's One Hundred Fifty Thousand (\$150,000.00) Dollars share is cumulative and does not apply separately to dealing with each incident, if any, of such hazardous waste contamination.

Sellers' obligations are conditional on Buyer's cooperation with Sellers and provision of access to the Property, records and personnel to assist in Sellers' investigation, remediation and control of the situation at no cost to Sellers provided Sellers act reasonably.

(f) that should hazardous waste contaminants be discovered on the real property of adjoining landowners, which contaminants were spilled, disposed of or released on the Property on or before the Transfer Day, at any time up to three (3) years after the Transfer Day in such levels that legally require soil and/or groundwater remedial services and the actual costs of

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such services, together with the actual costs of any remedial services covered by Subparagraph 18(d) are in excess of One Hundred Fifty Thousand (\$150,000.00) Dollars then Sellers shall defend, indemnify and hold harmless Buyer with respect to such contamination on condition that Buyer cooperate with Sellers and provide Sellers access to the Property, records and personnel to assist Sellers at no cost to Sellers provided Sellers act reasonably.

(g) the provisions of Subparagraphs (e) and (f) above shall also apply, mutatis mutandis, with respect to any third party claim made against the Buyer relating to damage caused by hazardous waste contaminants spilled, disposed of or released on the Property on or before the Transfer Day.

Sellers' warranties and representations under this Paragraph 18 shall survive for a period of three (3) years after the Transfer Day.

19. Bulk Transfer Laws. Buyer acknowledges that the Sellers will not notify their creditors of this transaction as required by the provisions of Chapter 25-6-101 et. seq. of the North Carolina General Statutes relating to bulk transfers, and the Sellers agree to indemnify and hold the Buyer harmless of and from any and all actions, claims, demands, damages, and costs, including attorneys' fees, arising out of or resulting from any debts incurred by Sellers in the operation of the Bassick-Sack Business prior to the Transfer Day (except those expenses specifically assumed by Buyer hereunder) or from Sellers' failure to comply with the provisions of the aforesaid bulk sales law. Sellers hereby warrant and covenant with Buyer that they will pay all their debts as and when they are due and before they are in default (except those debts specifically assumed by Buyer hereunder) and that there are no debts of the Bassick-Sack Business now owing which are past due and in default.

20. Buyer Not to Assume Sellers' Liabilities. Unless specifically assumed herein, Buyer is not to assume any liability

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