FILE NAME: Reynolds Metals (RM)

DATE: 0000

DOC#: RM065

DOCUMENT DESCRIPTION: Documents Acquired Under FOIA RE Contamination of Property Formerly Owned by Tilo

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I – New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Sent via FOIAonline
July 21, 2016

RE: Freedom of Information Act Request No. EPA-R1-2016-007849

Dear Mr. Kenney,

This is in response to your Freedom of Information Act request of June 21, 2016, **for information on 347 Longbrook Avenue in Stratford, CT.**

Please be aware that this is not a Superfund Site. Information responsive to your request have been uploaded to FOIAonline.

This letter concludes our response to your request. You may appeal this response by email at hq.foia@epa.gov, or by mail to the National Freedom of Information Office, U.S. EPA, 1200 Pennsylvania Avenue, N.W. (2822T), Washington, DC 20460 (U.S. Postal Service Only). Only items mailed through the United States Postal Service may be delivered to 1200 Pennsylvania Avenue, N.W. If you are submitting your appeal via hand delivery, courier service, or overnight delivery, you must address your correspondence to 1301 Constitution Avenue, N.W., Room 6416J, Washington, DC 20001. Your appeal must be made in writing, and it must be received no later than 90 calendar days from the date of this letter. The Agency will not consider appeals received after the 90 calendar day limit. Appeals received after 5:00 pm EST will be considered received the next business day. The appeal letter should include the FOIA tracking number listed above. For quickest possible handling, the subject line of your email, the appeal letter, and its envelope, if applicable, should be marked **"Freedom of Information Act Appeal."** Additionally, you may seek assistance from EPA's FOIA Public Liaison at hq.foia@epa.gov or (202)566-1667, or from the Office of Government Information Services (OGIS). You may contact OGIS in any of the following ways: by mail, Office of Government Information Services, National Archives and Records Administration, Room 2510, 8610 Adelphi Road, College Park, MD 20740-6001; e-mail, ogis@nara.gov; telephone, 301-837-1996 or 1-877-684-6448; and facsimile, 301-837-0348.

Due to the limited nature of your request there is no charge for the processing of it. If you have any questions, please contact Judy Lao-Ruiz at 617-918-1454.

Sincerely,

Bryan Olson, Director
Office of Site Remediation & Restoration

cc: Cris Schena, R1 FOI Officer

EARLY
♦
LUCARELLI
♦
SWEENEY &
♦
MEISENKOTHEN

ATTORNEYS AT LAW
An Association of Professional LLCs

EARLY, LUCARELLI, SWEENEY & MEISENKOTHEN, LLC
One Century Tower, 11th Floor
265 Church Street
New Haven, CT 06510
(203) 777-7799 (Fax) (203) 785-1671
web site: www.elslaw.com

Please Reply to New Haven

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ROBERT J SWEENEY •
ETHAN EARLY ••
CHRISTOPHER MEISENKOTHEN •••
BRIAN F EARLY ##
JENNIFER R LUCARELLI ••
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Providence, RI 02906

• CT & NH Bar
•• CT Bar
• CT & RI Bar
•• CT & NY Bar
••• CT, NY, MA, ME & GA Bar
••• LA & RI Bar
◦ CT, NY & CA Bar
‡ CT, RI & MA Bar
◦ NY, CA & DC Bar
♦ CT, NY & NJ Bar
CT, MA & NY Bar
○ NY & NJ Bar

June 21, 2016

Cristeen Schena
EPA New England, Region 1
5 Post Office Square-Suite 100
Boston, MA 02109-3912

Re: Freedom of Information Act request
EPA Site # CTD000845172

Dear Ms. Schena:

Please accept this letter as a request under the Freedom of Information Act for any and all documents and photographs related to the contamination of a property located at 347 Longbrook Avenue in Stratford, Connecticut. The EPA site number for this property is **CTD000845172**. This property was once owned by Reynolds Aluminum Building Products Co. (formerly Tilo Roofing Co.).

Please do not hesitate to contact me at 203-777-7799 if there is anything else I can do to expedite this matter. Thank you in advance for your kind attention to this request.

Yours very truly,

Brian P. Kenney

6/20

ENVIRONMENTAL PROTECTION AGENCY REGION 1

PRELIMINARY ASSESSMENT DECISION RECORD

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
CT	D CC 845172

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Reynolds Aluminum Bldg Prod. Co.	347 Longbrook Ave
03 CITY	**04 STATE** / **05 ZIP CODE**
Stratford	CT / 06497

DRAFT PA: completed by ☐ FIT (Fi-.....
☒ State
☐ EPA
☐ .....

DRAFT PRIORITY ASSESSMENT/RECOMMENDATION FOR SITE INSPECTION

☐ High ☐ Medium ☒ Low ☐ None

SUMMARY OF COMMENTS ON DRAFT

a. STATE comments, dated 6-12-85 by T. Stark

Summary change to ~~Poo~~ none

b. SITE OWNER comments, dated ....., by .....

Summary .....

c. EPA REGION 1 comments, dated 6-26-85, by D.R. Smith

Summary Agree

d. ..... comments, dated ....., by .....

Summary .....

FINAL PA DECISION BY EPA PA COORDINATOR:

a. ☐ agree with draft.
b. ☒ Revised draft. Reason State data

c. Final Priority Assessment/Recommendation for Site Inspection
☐ High ☐ Medium ☐ Low ☒ None

d. Final decision made by Donald R. Smith Date 6-26-85

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

EPA

I. IDENTIFICATION
01 STATE: CTD | 02 SITE NUMBER: 000845172

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site): Reynolds Aluminum Building Prod Co
02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER: 347 Longbrook Ave
03 CITY: Stratford
04 STATE: CT | 05 ZIP CODE: 06497 | 06 COUNTY: Fairfield | 07 COUNTY CODE: 001 | 08 CONG DIST: CT04
09 COORDINATES: LATITUDE 41 01 30.N | LONGITUDE 073 07 30W
10 DIRECTIONS TO SITE (Starting from nearest public road): From Interstate 91 South onto Interstate 95 South Exit 33 Stratford. (Facility is located north of Stratford Toll Plaza)

III. RESPONSIBLE PARTIES

01 OWNER (If known): Lawrence C. Tedesco
02 STREET (Business mailing address): 6601 West Broad St
03 CITY: Richmond
04 STATE: VA. | 05 ZIP CODE: 23261 | 06 TELEPHONE NUMBER: (804) 281-2918
07 OPERATOR (If known and different from owner): Charles Bent
08 STREET (Business mailing address):
09 CITY: Richmond
10 STATE: VA | 11 ZIP CODE: 23261 | 12 TELEPHONE NUMBER: (804) 261-2918
13 TYPE OF OWNERSHIP (Check one): X A. PRIVATE ☐ B. FEDERAL _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL ☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply): X A. RCRA 3001 DATE RECEIVED 8/18/80 (MONTH DAY YEAR) X B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED 12/28/81 (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION: ☐ YES DATE ___/___/___ (MONTH DAY YEAR) X NO
BY (Check all that apply): ☐ A. EPA ☐ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER _____ (Specify)
CONTRACTOR NAME(S): _____
02 SITE STATUS (Check one): ☐ A. ACTIVE X B. INACTIVE ☐ C. UNKNOWN
03 YEARS OF OPERATION: _____ (BEGINNING YEAR) _____ (ENDING YEAR) X UNKNOWN
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED: Asbestos, nickel, zinc, copper, chromium and cyanide were detected in samples taken from facilities waste site
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION: Asbestos was historically disposed of at site in question. Asbestos is not a listed hazardous waste. There is, however a potential public health problem should asbestos particles become airborne

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents): ☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) X D. NONE (No further action needed; complete current disposition form) ok 6 26-86

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)			03 TELEPHONE NUMBER
Pat Bowne	CT-DEP			(203) 566-8843
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Michael Dones	DEP	Hazardous Materials	(203) 566-8843	10/9/84 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
CT	D	000845772

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- ✓ A SOLID
- B POWDER FINES
- C SLUDGE
- D OTHER _____ (Specify)
- E SLURRY
- F LIQUID
- G GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS UNKNOWN

CUBIC YARDS _____

NO OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- A TOXIC
- B CORROSIVE
- C RADIOACTIVE
- D PERSISTENT
- E SOLUBLE
- F INFECTIOUS
- G FLAMMABLE
- H IGNITABLE
- I HIGHLY VOLATILE
- J EXPLOSIVE
- K REACTIVE
- L INCOMPATIBLE
- ✓ M NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
IOC	ZINC	7440-66-6	ON site disposal	MG/L	6.7
IOC	Chromium	7440-47-3	ON site disposal	MG/L	0.27
IOC	Nickel	7440-02-0	ON site disposal	MG/L	1.4
IOC	Copper	7440-50-8	ON site disposal	MG/L	0.11
IOC	Cyanide		ON site disposal	MG/L	3.5
TOX	asbestos		ON site disposal	MG/L	

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	Chromium	7440-47-3	FDS		
FDS	Nickel	7440-02-0	FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references e.g. state files, sample analysis reports)

Hazardous materials file
sample analysis Report

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE | 02 SITE NUMBER
CTD 000845172

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A GROUNDWATER CONTAMINATION | 02 ☐ OBSERVED (DATE _____) | ☐ POTENTIAL | ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION
Groundwater classification is GB

01 ☐ B SURFACE WATER CONTAMINATION | 02 ☐ OBSERVED (DATE _____) | ☒ POTENTIAL | ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION

01 ☐ C CONTAMINATION OF AIR | 02 ☐ OBSERVED (DATE _____) | ☐ POTENTIAL | ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION

01 ☐ D FIRE/EXPLOSIVE CONDITIONS | 02 ☐ OBSERVED (DATE _____) | ☐ POTENTIAL | ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION

01 ☐ E DIRECT CONTACT | 02 ☐ OBSERVED (DATE _____) | ☒ POTENTIAL | ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION
Asbestos particles can become airborne and affect the publics health

01 ☐ F CONTAMINATION OF SOIL | 02 ☐ OBSERVED (DATE _____) | ☐ POTENTIAL | ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED _____ (Acres) | 04 NARRATIVE DESCRIPTION

01 ☐ G DRINKING WATER CONTAMINATION | 02 ☐ OBSERVED (DATE _____) | ☐ POTENTIAL | ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION

01 ☐ H WORKER EXPOSURE/INJURY | 02 ☐ OBSERVED (DATE _____) | ☐ POTENTIAL | ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION

01 ☐ I POPULATION EXPOSURE/INJURY | 02 ☐ OBSERVED (DATE _____) | ☐ POTENTIAL | ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ | 04 NARRATIVE DESCRIPTION

Reynolds Aluminum Building Prod Co.
Stratford, CT

Suggest a low peicerity fee inspection. This facility has been closed fee sometime now (appeaeance). It was said to have been sold 1/20/93. Demolition began to make way fee a new shopping plaza. Concern aecse when it was found that asbestos was buried onsite. The Demolition Co. was afeaid that the asbestos can become aiebeene and have an impact to the public and envieonment. A field inspectee spoke to the peeson in chaeye of the demolition and said all demolition waste would be used as fill on site and will not be remaved fecm the peemises. This peoblem will be stabilized when paeking lots aee constructed with shopping mall also.

JU0037

REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

1981 June 09

CERTIFIED MAIL RETURN RECEIPT REQUESTED JUN 12 2 05 PM '81

U.S. Environmental Protection Agency
Region I
Sites Notification
P. O. Box 8748
Boston, MA 02114

Re: EPA Superfund Notifications For:
Reynolds Aluminum Building Products Co.

Dear Sir:

Please find attached a completed Notification Form for the Reynolds facility located within Region I.

Reynolds believes that the interpretative notice and policy statement published in the Federal Register (46 FR 22144) in conjunction with the reporting requirements under Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (hereafter "Superfund" or "Act") is imprecise and does not provide a complete interpretation of the Act's reporting requirements. Recent discussions with Agency representatives also indicates there is still some intra-Agency confusion as to the Agency's exact interpretation of the Act's reporting requirements.

Therefore, submission of this notification by Reynolds Metals Company is not in any way an admission that the above facility now, or in the past, have ever generated hazardous wastes, or that this plant, now or in the past, was a storer, treater, or disposer of hazardous waste or that Reynolds is the owner or operator of a hazardous waste management facility. Reynolds Metals Company reserves the right to withdraw the attached notification form at any time in the future. Further, due to the imprecise nature of these reporting requirements, Reynolds reserves the right to amend this notification or to submit additional information at any time in the future.

We request that this letter be attached to and made a permanent part of the attached notification. If you have any questions please contact C. R. Bent at (804/281-2918) or myself at (804/281-3871).

Sincerely,

C. Tropea

Lawrence C. Tropea, Jr, P.E.
Director of Environmental Control
Environmental Control Department

/ct

Attachment

EPA Notification c Hazardous Waste Sit

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

CTSD000001067

810609

Rey.

Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name: Reynolds Metals Company

Street: 6601 West Broad Street

City: Richmond State: VA Zip Code: 23261

Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site: Reynolds Aluminum Building Products Company

Street: 347 Longbrook Avenue

City: Stratford County: Fairfield State: CT Zip Code: 06497

CTD000845172

Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Bent, Charles, Staff Env. Engineer

Phone: 804/281-2918

Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1961 To (Year): 1980

Waste Type: Choose the option you prefer to complete

Option I: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☒ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

_____

_____

_____

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☒ Other (Specify)

Asphalt roof manufacturing

_____

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

U U 0 3 6		

JUN 12 2 05 PM '81

Form Approved
OMB No. 2000-0138

EPA Form 8900-1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

February 23, 1995

KRANZCO Realty Trust
128 Fayette Street
Conshohocken, PA 19428

Dear Sir or Madam:

Last week the New England office of the United States Environmental Protection Agency deleted 655 sites from the Superfund inventory of known or suspected waste disposal sites. The purpose of this action was to eliminate from EPA's inventory of sites those locations where investigations have been completed and a determination made that the location is not appropriate for listing on the National Priorities List of Superfund sites. A list of these deleted sites was provided to local media, and you may have seen the list published in your local newspaper.

Through a coding error in EPA's database, several sites located in Stratford, Connecticut were mistakenly deleted from the Superfund inventory. Because these sites are part of the Raymark Industries, Inc. investigation and clean-up currently underway in Stratford, they are being returned to the Superfund inventory of known or suspected waste disposal sites.

These sites include:

D'Addario Property Honeyspot Road CTD982198921	Morgan Francis Co. (Fleet Tool) E. Broadway & Ferry Blvd. CTD001165307
Housatonic Boat Club Shore Road CTD980520365	Reynolds Aluminum Bldg. Prod. Co. 347 Longbrook Ave. CTD000845172
Spada's Rotary Shop Ferry Blvd. CTD018830166	Stratford Industrial Park Lordship Blvd. CTD981069297

The Agency is conducting additional investigative work in connection with the proposed Raymark Industries, Inc. Superfund site. As part of this ongoing study, the above-mentioned properties will be further evaluated to determine appropriate Agency actions.

COPY

PRINTED ON RECYCLED PAPER

We apologize for this error and any inconvenience this may have caused you.

If you have any questions about the Raymark Industries, Inc. investigation, or about the inclusion of these sites in the Superfund inventory, please contact Mr. Richard Cavagnero at (617) 573-5720.

Sincerely,

Nancy Smith
Site Assessment Manager
Waste Management Division

cc: Ed Parker, CT DEP
Doug Zimmerman, CT DEP
Adam Sullivan, CT DEP
Mark Barnhart, Stratford Town Manager
Elaine O'Keefe, Stratford Health Dept.
Andrea Boissevain, Town of Stratford
Lewis Goldshore, Esq.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

June 28, 1985

Mr. Tom Stark
Senior Environmental Analyst
Hazardous Waste Management Section
Connecticut DEP
165 Capitol Avenue
Hartford, CT

Dear Mr. Stark:

I have reviewed the Preliminary Assessment comments provided by you in your letter of June 12, 1985, addressed to Ruth Leabman. As a result the following actions were taken.

DRAFT PA ACCEPTED AS FINAL:

Bee Publishing Co.	Newtown	Low priority
Drakes Blastrip	Andover	Med priority
E. B. Exterminating	East Haddam	Med priority
Prismar Inc.	Higganum	Low priority
Illustrated Printing	Haddam	Med priority
Moodus Paint Shop	East Haddam	Low priority
Nite Brite Sign Co.	Monroe	Low priority
Noranda Metal Ind.	Newtown	Low priority
Patriot Manufacturing	East Haddam	High priority
Pioneeer Industries	Putnam	Low priority
Richards Metal Products	Wolcott	Low Priority
Risdon Co.	Waterbury	Med priority

DRAFT PA CHANGED, FINAL PRIORITY AS NOTED:

O'Sullivans Island	Derby	Low Priority
RAM Chromium	So. Willington	No SI Needed
Reynolds Aluminum	Stratford	No SI needed
Swift Adhesives & Coatings	West Haven	No SI needed
U.S. Baird Corp.	Stratford	No SI needed

Two sites, Maur-Mel Automatics, Wolcott, and Post Narrow Fabrics, Andover, did not have a priority assigned on the draft PA. Please provide us with the priority so that the PAs can be completed.

As requested a copy of the PA for J. C. Products, Haddam, is enclosed. Please provide us with the requested information as soon as possible.

Please contact me at (617) 223-1941 if you have any questions.

Sincerely,

Don Smith

Enclosure

cc: J. Hackler
B. McAllister
R. Leebman

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

April 11, 1985

Edward Parker
Assistant Director
Hazardous Waste Management Unit
Connecticut DEP
165 Capitol Avenue
Hartford, CT 06106

Dear Mr. Parker:

As the result of a change in assignments within the Regional Superfund program, I am now the contact for all reviews of Preliminary Assessments and Site Inspections. As a part of my new assignment I have reviewed the past correspondence between your office and Richard Cavagnero regarding his comments of draft Preliminary Assessments submitted by Connecticut. We have no record of the State's response to comments on the following sites.

From R. Cavagnero letter of January 7, 1985:

Bee Publishing Co.	Newtown	CTD001084746	Low
Risdon Co.	Waterbury	CTD001168514	Med

From R. Cavagnero Letter of January 15, 1985:

Drakes Blastrip	Andover	CTD088315072	Med
E. B. Exterminating	East Haddam	CTD059825893	Med
Frismar Inc	Higganum	CTD039274923	Low
Illustrated Printing	Haddam	CTD081300113	Med
J. C. Products Inc.	Haddam	CTD001151646	Med
Maur Mel Automatics	Wolcott	CTD001165851	?
Moodus Paint Shop	East Haddam	CTD001154525	Low
Nite Brite Sign Co.	Monroe	CTD001174036	Low
Noranda Metal Ind.	Newtown	CTD052708450	Low
O'Sullivans Island	Derby	CTD980667992	?
Patriot Manufacturing	East Haddam	CTD021807508	High
Pioneer Industries	Putnam	CTD059831420	Low
Post Narrow Fabrics	Andover	CTD980732325	?
RAM Chromium Corp.	So. Willington	CTD018811273	Med
Reynolds Aluminum	Stratford	CTD000845172	Low
Richards Metal Products	Wolcott	CTD002592665	Low
Swift Adhesives & Coatings	West Haven	CTD064837982	Low
US Baird Corp.	Stratford	CTD001168384	?

Please provide me with your comments on these sites as soon as possible. If no comments are received, we will enter the Preliminary Assessments into ERRIS as being complete on May 3, 1985.

Please contact me at (617) 223-1941 if you have any questions or need additional time to complete your review.

Sincerely,

Don Smith

cc: D. Coughlin
R. Leabman
R. Cavagnero

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

6-12-85

Ms. Ruth Leabman
U.S. EPA Region I
John F. Kennedy Federal Building
Boston, Mass. 02203

Dear Ms. Leabman:

I have received your letter dated April 16, 1985 requesting a response to Rich Cavagnero's comments on the Preliminary Assessments. In each case the files were reviewed in order to clarify or add to the information in the PA.

1. Bee Publishing Co., Newtown - The materials which were disposed of to the drywell on the September 26, 1980 hazardous waste inspection report as follows: 2-diethylaminoethanol (1 gal/wk); Agfa-Gevant developer; Ammonium Thosulfate; Acetic Acid; Ammonium Thocyanate; Potasa; Sodium Sulfile.

2. Risdon Co., Waterbury - The Waste pile has been removed and the company has achieved compliance with the Department of Environmental Protection Order.

3. Drakes Blastrip, Andover - The company is not a RCRA notifier and a short site visit would be required to ascentain current waste management practices. An inspection by our staff will be scheduled.

4. E.B. Exterminating, East Haddam - Some utensils are washed in the sink. Currently all drains discharge to a drywell on-site. In the past these drains emptied into a nearby stream. The waste types are as follows: 1. Termite control - A) Emulsifable Concentrate, B) Dieldrite Petroleum Eydrocarbon; 2) Rodent Control - A0 Fumarin-22, B) Zinc Paospaide; 3) Squirrel Control - A) Paradichlorobenzene (100%); 4) Insect Control - A) Durshan ZE inspcticide, emulsifable concentrate, O.o Diethyl o-(3,5,6, Trichloropyrdyl) B) Pyrethrim, Technical Piperonyl Butonide, Vapona, Malathion, Nethane.

5. Frismar Inc., Higganum - Aoree, Cercla not applicable

6. Illustrated Printing, Haddam - Same as number 3.

7. J.C. Products Inc., Haddam - This PA could not be located in our files. Please send a copy of this PA to complete our files.

Phone:
165 Capitol Avenue • Hartford, Connecticut 06106
An Equal Opportunity Employer

8. Maur Mel Automatics, Wolcott - The information was obtained from a June 10, 1980 hazardous waste inspection report which stated that oils and solvents were disposed of on-site.

9. Woodus Paint Shop, East Haddam - This company was purchased approximately one year ago. The past owner could not be contacted. The new owner stated that the previous owner had been disposing of waste in a drum for about one year. The past owner and left 3/4 of a 55 gallon drum of waste on-site. This material was reported to be a silute solution of patash, hydroquinon and acetic acid.

10. Nite Brite Sign Co., Monroe - Same as number 3.

11. Noranda Metal Ind., Newtown - Pre 1970. on-site limestone filter bid(s) for disposal of pickling wastes.

12. O'Sullivan's Island, Derby - Please forward a copy of the final report when it is completed.

13. Patriot Manufacturing, East Haddam - The company is out of business and could not be contacted by phone. Also the exact locations of the company could not be determined since there are several buildings in the industrial park and the building number was not provided with the address.

14. Pioneer Industries, Putnam - File information indicates that this company was planning to move in 1980 therefore it may be difficult to contact the company.

15. Post Narrow Fabrics, Andover - Information on the lagoons was taken from the Water Compliance files. The lagoon was used to treat waste dyes and caustic peroxides and also chlobenzene was used once a week to control odor.

16. R-M Chromium Corp., South Sillington - The contact at the company, Art Lantiegne, stated that the sandbeds are still in operation but receive only two 55 gallon drums of sludge per year. This is a RCRA situation. An inspection will be conducted.

17. Reynolds Aluminum, Stratford - Construction has been completed at this site and is now covered by a building and parking lot. No sili is required.

18. Richards Metal Products, Wolcott - Same as number 3

JAN 15 1985

Ed Parker
Assistant Director
Hazardous Waste Management System
Department of Environmental Protection
State of Connecticut
165 Capitol Avenue
Hartford, CT 06106

Re: CT Preliminary Assessments (PA's) Quarterly Report

Dear Ed:

I have completed review of the 38 preliminary assessments submitted on October 22, 1984 by Mark Franson of your staff and have the following comments:

1. Line Mfg. Co, Inc.

   - Agree, med priority

2. Linemaster Switch Corp.

   - Agree, med priority

3. Dairylea Co-op, Inc.

   - Agree, low priority

4. Pioneer Industries

   - Photographic wastes are generally non-hazardous, dilute solutions; the company should be contacted as part of the P.A. for specific information on the waste stream to determine if it is hazardous under CERCLA.

5. RAM Chromium Corp.

   - This company should be contacted as part of the P.A. to determine if the sandbed dewatering practice has been discontinued, as suspected.

SYMBOL	- This seems to be an obvious RCRA situation.						
SURNAME	RAC						
DATE	1-15-85						

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

6. Mattatuck Mfg. Co.

- This company should be inspected on a high priority basis to evaluate compliance with DEP orders.

7. Moodus Print Shop

- Company should be contacted for specific information on wastestream to determine applicability under CERCLA.

8. Synthetic Products Division/Plastic Specialties

- Medium priority inspection to evaluate compliance with DEP order and efficacy of groundwater treatment system.

9. Illustrated Printing Co.

- Same as #4,7

10. Somers Industrial Finishing

- Agree, but suggest high priority s.i. due to proximity of residential wells.

11. J.C. Products Inc.

- This seems to be a RCRA case, is it?

12. Waterbury Heat Treating

- Agree, med priority

13. Patriot Mfg. Co.

- It is unclear if oil/detergent mixture is hazardous under CERCLA; toxic, flammable, ignitable chacteristics should be explained. Company should be contacted for more specific information on wastestream before site inspection is scheduled.

14. Nite Brite Sign Co., Inc.

- Same as #4,7&9

15. Drakes Blastrip

- Company should be contacted to update status of waste management practices; this seems like a possible RCRA case if the co. still exists.

	CONCURRENCES							
SYMBOL								
SURNAME								
DATE								

EPA Form 1320-1 (12-70)

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16. Noranda Metal Industries

- Why is an inspectiuon warranted?

17. Precision Plating

- This situation seems to have been taken care of with the exception of groundwater treatment and/or provision of alternate water supply to the affected parties. I would recommend a med priority site inspection to evaluate groundwater monitoring results and to determine what if anything was done about the contaminated community well.

18. J.H. Sessions & Sons, Inc.

- O.K.

19. Revere Textile Prints Corp.

- Recommend high priority s.i. to evaluate possibility of residential well contamination and to review results of co's groundwater investigation.

20. London Lab, Inc.

- Agree, med priority

21. King Industries

- A site inspection is needed to determine if contaminants are leaching to the Norwalk River - med priority

22. Maur Mel Automatics

- How is it known that oils and solvents were disposed onsite?

23. Post Narrow Fabrics Co.

- How it is known that lagoons exists onsite? What was disposed in the lagoons?

24. CEM Co. Inc.

- Agree, med priority

25. Prismar, Inc.

- If waste is non hazardous, as indicated, CERCLA does not apply.

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

26. E.B. Exterminating

- Company should be contacted for background information on waste types and practices before determining if an inspection is warranted.

27. Swift Adhesives & Coatings

- Why is an inspection needed?

28. U.S. Baird Corp.

- Company should be contacted for background information on waste types and practices before determining if an inspection is warranted.

29. AGC Inc.

- Suggest high priority inspection to include community wellfield sampling/analysis.

30. Nutmeg Screw Machine Products

- Suggest high priority inspection.

31. Richards Metal Products

- Company should be contacted for information of disposition of drummed wastes and manifests should be reviewed for information on current wastes for comparison. Current information suggests that a site inspection is unwarranted.

32. Mailly Mfg. Corp.

- Agree, low priority to determine if cleanup was done properly

33. O'Sullivan's Island

- This site has had two removal actions performed; a final report will be issued after completion of the second one. No site inspection is needed.

34. Killingly Landfill

- Agree, low priority

35. Manchester Sanitary Landfill

- Agree, low priority

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

GPO : 1983 0 - 403-201

36. West vaco

- Suggest high priority

37. Reynolds Aluminum

- The status of construction should be determined to see if an s.i. is warranted.

38. Closed Dump-Shelton

- Agree, medium priority

EPA will schedule site inspections by our FIT contractor, NUS Corp., for 19 of 38 PA's, as indicated. The need for site inspections on 18 of the other 19 (excepting J.-H. Sessions) cannot be determined on the basis of the PA information submitted. In most cases, the necessary information could be obtained by simply contacting the companies involved or local officials. The average $600 cost per P.A. should be adequate to include this follow up effort where needed. Site inspection by the FIT team are a costly undertaking and should not be used to gather information obtainable by a phone call at the P.A. stage.

Sincerely,

Richard A. Cavagnero
CT Superfund Coordinator

bcc: Ruth Leabman
Rosalie Baldassari

	CONCURRENCES							
SYMBOL								
SURNAME								
DATE								

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ [redacted]

[redacted]
[redacted]
[redacted] CT 06497

INSTALLATION ADDRESS ➤ [redacted]
[redacted]
[redacted] CT 06497

EPA Form 8700-12B (4-80) [redacted]

ne/ bionetics /corporation

.O. BOX 1575
VINT HILL FARMS STATION
WARRENTON, VIRGINIA 22186
(703) 347-6348

November 19, 1986

Richard Piligian
Connecticut Waste Regulation Section
Environmental Protection Agency
J. F. Kennedy Federal Building
Boston, MA 02203

Dear Rich:

As per our conversation on Monday, November 17th I have enclosed a set of prints which cover or partially cover the area we discussed. The prints are from the set of prints I generated for the Raymark site analysis so you will see them again. In addition to the prints I have also generated a set of overlays to help orient you to some of the things that I saw during a quick look through the photography. There has been no review of this quick analysis by other analysts on staff so it should be treated as an interim product.

The area in question is the Xebec Land Corporation according to Figure 12 of the Preliminary Assessment written by Andrew Hoftman, dated November 26, 1985. The corporate title would suggest that landfilling and waste disposal are their business and one would assume that they are permitted to carry on those activities. However the duration and scope of activities observed on site, a filled wetland, induced me to send this information to you. If they are a landfilling business, it's interesting that they don't appear on the list of Raymark dumping locations cited on page three of the Preliminary Assessment cited earlier.

If it is decided to request a site analysis of this area, mention in the request and/or to Tom that I already have the film, it might quicken the process. If I can answer any questions or be of help in some way call me at FTS 557-3110.

Sincerely,

Eric

Eric Warner

REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

November 2, 1983

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

U. S. Environmental Protection Agency
Region I
Solid Waste Program
John F. Kennedy Building
Boston, Massachusetts 02203

Re: Rescinding Notification Form for:
Reynolds Aluminum Building Products Co.
CTD000845172
Stratford, Connecticut

Dear Sir:

Please find attached a completed Subsequent Notification Form for our Reynolds Aluminum Building Products facility.

Our Reynolds Aluminum Building Products facility ceased all manufacturing operations during January 1981. No hazardous wastes were generated, stored or disposed of at this facility. Reynolds sold the Reynolds Aluminum Building Products facility in June 1983.

Therefore, the attached Subsequent Notification Form dated January 1983, does not indicate any type of waste activity or any description of hazardous wastes pursuant to Item VI & IX, respectively.

We request that the Agency rescind our status as a hazardous waste generator and rescind our EPA I. D. Number. In addition, we request that this letter be attached to and made a permanent part of the attached Notification Form. Finally, we request that your files, computer lists, etc., be revised to show that the Reynolds Aluminum Building Products facility is no longer owned or operated by Reynolds Metals Company.

If you have any questions, please feel free to contact me at (804) 281-2918.

Sincerely,

C. R. Bent, P. E.
Environmental Engineer
Environmental Control Department

CRB/ych

cc: Connecticut Department of Environmental Protection

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158S73010
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F (T/A: C; 1) | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

REYNOLDS ALUMINUM BUILDING PRODUCTS CO

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 347 LONGBROOK AVENUE

CITY OR TOWN: 4 STRATFORD | ST.: CT | ZIP CODE: 06497

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 347 LONGBROOK AVENUE

CITY OR TOWN: 6 STRATFORD | ST.: CT | ZIP CODE: 06497

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 BENT C R ENVIRON. ENGINEER | PHONE NO. *(area code & no.)*: 804-281-2918

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 REYNOLDS METALS COMPANY

ATTACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [ ] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: CTD000845172

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

REYNOLDS ALUMINUM
REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

November 2, 1983

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

Solid Waste Management Unit
Department of Environmental Protection
165 Capital Avenue
Hartford, Connecticut 06115

Re: Rescinding Notification Form for:
Reynolds Aluminum Building Products Co.
CTD000845172
Stratford, Connecticut

Dear Sir:

Please find attached a completed Subsequent Notification Form for our Reynolds Aluminum Building Products facility.

Our Reynolds Aluminum Building Products facility ceased all manufacturing operations during December 1981. No hazardous wastes were generated, stored or disposed of at this facility. Reynolds sold the Reynolds Aluminum Building Products facility in June 1983.

Therefore, the attached Subsequent Notification Form dated January 1983, does not indicate any type of waste activity or any description of hazardous wastes pursuant to Item VI & IX, respectively.

We request that the Department rescind our status as a hazardous waste generator and rescind our EPA I. D. Number. In addition, we request that this letter be attached to and made a permanent part of the attached Notification Form. Finally, we request that your files, computer lists, etc., be revised to show that the Reynolds Aluminum Building Products facility is no longer owned or operated by Reynolds Metals Company.

If you have any questions, please feel free to contact me at (804) 281-2918.

Sincerely,

C. R. Bent, P. E.
Environmental Engineer
Environmental Control Department

CRB/ych

cc: U. S. EPA, Region I

[illegible] FACILITY
CTD000604470
CTD000604482
CTD000604538
CTD000604546
MAD000604454
MAD000604462
MAD000604504

file

OLD FACILITY	
CTTC0066U4470	
CTTC0066U4482	
CTTC0066U4538	
CTTC0066U4546	
CTTC0066U4554	
CTTC0066U4562	
CTTC0066U4570	

TOTAL NUMBER OF TRANSACTIONS: 7

TOTAL NUMBER OF TRANSACTIONS ACCEPTED: 7
TOTAL NUMBER OF TRANSACTIONS REJECTED: 0

Not TSDF

REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

1981 March 16

Certified Mail
Return Receipt Requested

Richard Cavagnero
U. S. EPA Region I
J.F.K. Federal Bldg., Room 2109
Boston, Massachusetts 02203

CTD000845172
Reynolds Aluminum Building Products Co.
347 Longbrook Ave.
Stratford, Connecticut 06497

Dear Mr. Cavagnero:

In response to your letter of March 2, 1981, requesting RCRA information regarding our lack of filing part A of the hazardous waste permit application, Reynolds Metals Company has reviewed the hazardous waste management regulations and amendments promulgated by the U. S. Environmental Protection Agency pursuant to the Resource Conservation and Recovery Act. Our continuing review activities have led Reynolds to the conclusion that a permit application is not, at this time, required for the waste management activities at the above-referenced facilities.

Reynolds is now preparing amended notification forms for the above facility, which will detail why this facility does not need to file for a hazardous waste permit.

If you have any questions regarding this letter, please contact Mr. C. R. Bent (804)281-2918 or myself (804) 281-3952.

S. D. Ryan

S. D. Ryan
Staff Environmental Engineer
Environmental Control Department

/bj

REYNOLDS ALUMINUM
REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

1980 August 18

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Dennis Huebner, Chief
U. S. Environmental Protection Agency
Region I
Waste Management Branch
John F. Kennedy Building
Boston, Massachusetts 02203

Re: EPA Notification Forms For:
Tilo Company, Inc.

Dear Sir:

Please find attached complete Notification Forms for the various Reynolds facilities located within the Region.

Reynolds believes that many provisions of the hazardous waste management regulations are imprecise and discussions with Agency representatives indicate confusion as to the Agency's interpretation of certain provisions of the regulations.

Therefore, submission of these notifications by Reynolds Metals Company is not in any way an admission that any of the reported substances are hazardous wastes, or that any of these plants are storers, treaters, or disposers of hazardous waste or are the owners or operators of hazardous waste management facilities. Reynolds Metals Company reserves the right to withdraw any of the attached notification forms at any time in the future. Further, due to the imprecise nature of the regulations Reynolds reserves the right to amend these notifications or to list additional substances at any time in the future.

We request that this letter be attached to and made a permanent part of the attached notifications. If you have any questions please contact Mr. C. R. Bent (804/281-2918) or myself (804/281-3871).

Very truly yours,

L. C. Tropea/ct

Lawrence C. Tropea, Jr., P.E.
Director of Environmental Control
Environmental Control Department

/ct

Attachments

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only. OMB No. 2050-0ΕΡΑ-01

EPA — ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

003 081

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
FCTD000845172 (T/A/S: I)	A	800818

Aug 18 11 24 AM '80

I. NAME OF INSTALLATION

Reynolds Aluminum Building Products Co

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3347 Longbrook Avenue

CITY OR TOWN: Stratford — ST.: Ct — ZIP CODE: 06497

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 3347 Longbrook Avenue

CITY OR TOWN: Stratford — ST.: Ct — ZIP CODE: 06497

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: Piccioli Flavio — PHONE NO. *(area code & no.)*: 203-375-3331

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: Reynolds Metals Company

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: F

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.:

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE. November 8, 1977

SUBJECT. Trip Report - Tilo Company, Inc.

FROM: Steven Fradkoff, Engineer
Air Compliance Section

TO: Thomas G. Hopper, Chief
Air Compliance Section

I. GENERAL INFORMATION

1. Tilo Company, Inc.
   Subsidiary of Reynolds Aluminum

2. Address: 347 Longbrook Avenue, Stratford, CT

3. Telephone: 203/375-3331

4. Date of Survey: 2/10/77

5. Present During Survey: Jim Link, Engineer

6. Mr. F. J. Piccioli is responsible for compliance with State and Federal air pollution abatement requirements.

7. New York - New Jersey - Connecticut Interstate AQCR non-attainment for TSP, attainment for SO_2.

8. A State survey was conducted 1/20/77.

9. Brief Case History

   There is no history of violations of CDEP regulations for control of criteria pollutants.

10. Purpose of survey was to document the compliance status of this source with applicable requirements.

11. Applicable Air Pollution Regulations

    19-508-18a visible emissions
    19-508-18b fugitive particulate emissions

II. PROCESS INFORMATION

Tilo Company manufactures roofing shingles. Tilo also produces felt, coating asphalt, and saturatant (asphalt) used to manufacture roofing shingles.

Roofing felt is produced from soft woods (21 tons/day) and waste paper (14 tons/day) (see attached flow diagram). Wood is chipped, defibered, and the wood fiber slurry from the defibrator is stored in a tank. Waste paper is pulped in a hydropulper. The pulp slurry is screened, thickened and stored. Wood fiber and pulp slurries from the storage tanks are mixed, screened, and formed into felt on cylinder type paper machines. The felt is dried, rolled, slit and rewound for use in the manufacturing of roofing shingles.

In the production of roofing shingles (see flow diagram) felt is saturated with asphalt (saturant), coated with a heavier asphalt (coating), then coated with granules, dried, cut and bundled for sale.

Saturatant and coating asphalt are produced by oxidation of asphalt flux, the bottom product from stills in the petroleum refining industry. Asphalt flux is purchased from Shell Oil, delivered by tank truck and pumped into a 10,000 gallon storage tank. Flux is pumped from the storage tank to one of five old horizontal blow stills that are now used as storage tanks and asphalt heaters.

Each tank is heated by a steam atomized oil burner firing #6 oil at a rate of 40 gph. The flux is heated to approximately 460°F and pumped to the vertical oxider (blow still). Air is blown through the still, to oxidize the asphalt flux. The difference between the saturatant and coating asphalt is the degree of oxidation which is controlled by temperature and duration of the blowing process. Saturatant is oxidized for 45 minutes to 1 1/4 hours at 460°F. Coating asphalt is oxidized for 3 1/2 to 5 hours at 505°F. 85 to 90 tons of asphalt are oxidized daily. Fumes from the vertical oxidizer are incinerated in Boiler "B" as combustion air.

Boilers "A" and "B", the asphalt tube heaters and horizontal stills, are all heated by #6 oil. Total annual fuel usage is 2,026, 822 gallons. Aegis Model 1 smoke monitors are installed on both boilers, the asphalt tube heater, and the stack common to the 5 stills.

III. AIR POLLUTION SOURCES

The production of roofing felt is a wet mechanical process. No emissions of particulate result from production of roofing felt.

The major sources of particulate emissions from asphalt roofing plants are the asphalt blowing operation and felt saturation. A minor source of particulates is the covering of roofing material with roofing granules

and handling of the granules. Hydrocarbons are emitted from asphalt in the form of oil aerosols which are not subject to organic solvent emission regulations.

Emissions from the blow still are estimated to be 2.5 pounds per ton of asphalt produced (AP-42) or 150 pounds per day. Emissions from the blow still are condensed and the condensables are mixed with the boiler fuel oil. The non-condensables are fed into boiler "B" as combustion air and incinerated. Emissions from the asphalt saturator (743 pounds per day) are incinerated in the Asphalt Tube Heater and emissions from the Drying-In Section of the saturator are incinerated in boiler "A". The five (5) old horizontal blow stills are fitted with fume hoods over the manholes on top of each still. The still are filled through the manhole on top. During filling, asphalt fumes are collected by the hood, ducted to boiler "B" and incinerated.

Granules are received by truck, dumped into a hopper and conveyed by bucket elevator to a storage silo. Granules are fed by gravity from the silo to conveyor belts which carry the granules to an area where different granules can be mixed. From the mixing area the granules are conveyed by bucket elevator to conveyors which carry the granules into the plant. There is a dust pickup system where the granules enter the plant which controls dust emission by the use of a baghouse. An additional baghouse, which exhausts into the work-room, is used to control dust emission from the coating of granules on the asphalt shingles and from the application of talc used to prevent the roofing shingles from sticking together.

Limestone powder, 200 mesh, is received by truck and pneumatically conveyed to a storage silo. Limestone emissions from the silo are controlled by torit type dust collectors. The limestone is conveyed by a screw conveyor into the plant where it is mixed with the coating asphalt.

IV. DOCUMENTATION AND EVIDENCE OF VIOLATION

There is no documentation of violations of Connecticut Regulations.

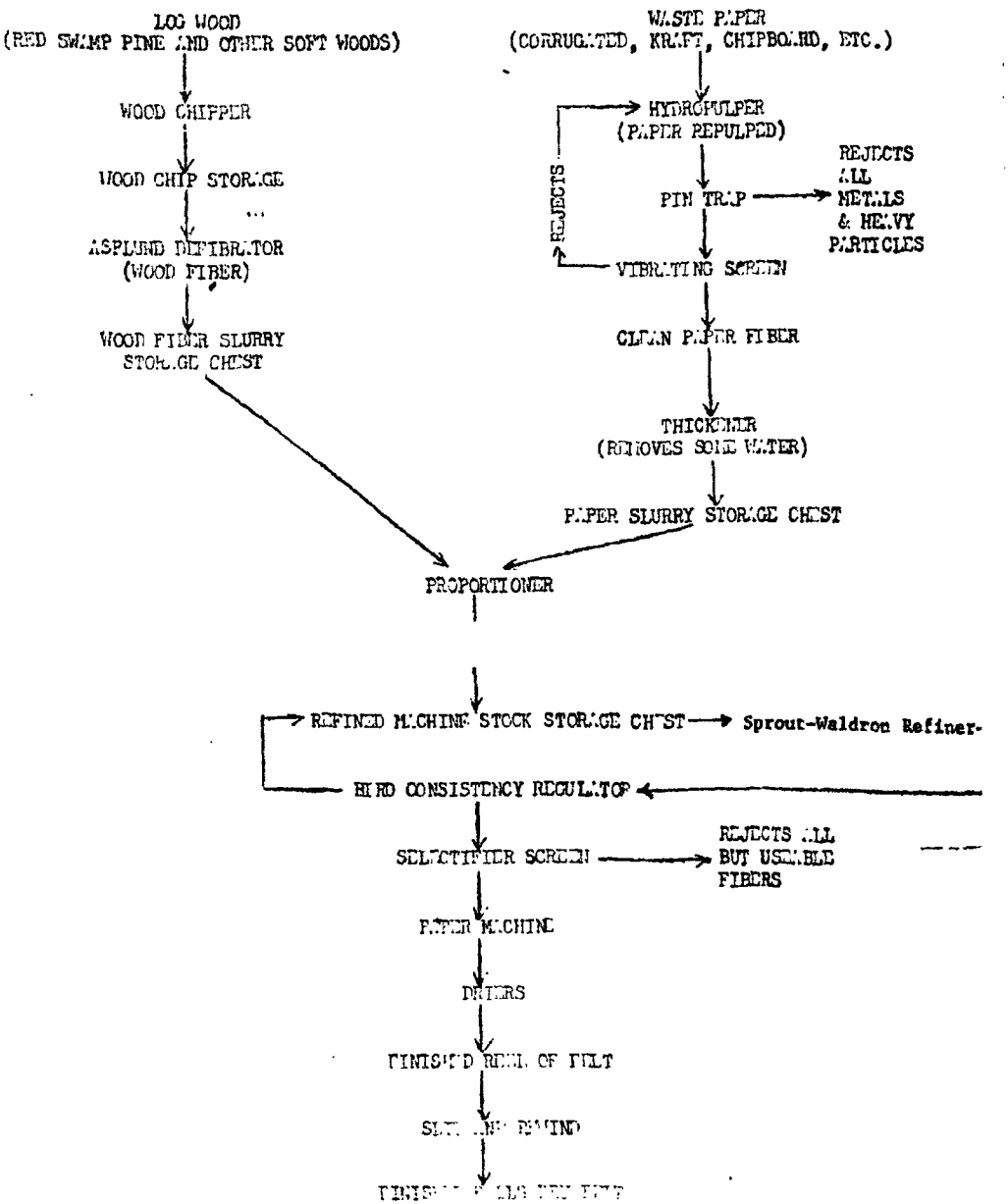
V. RECOMMENDATIONS

The subject facility was not in operation during the survey.

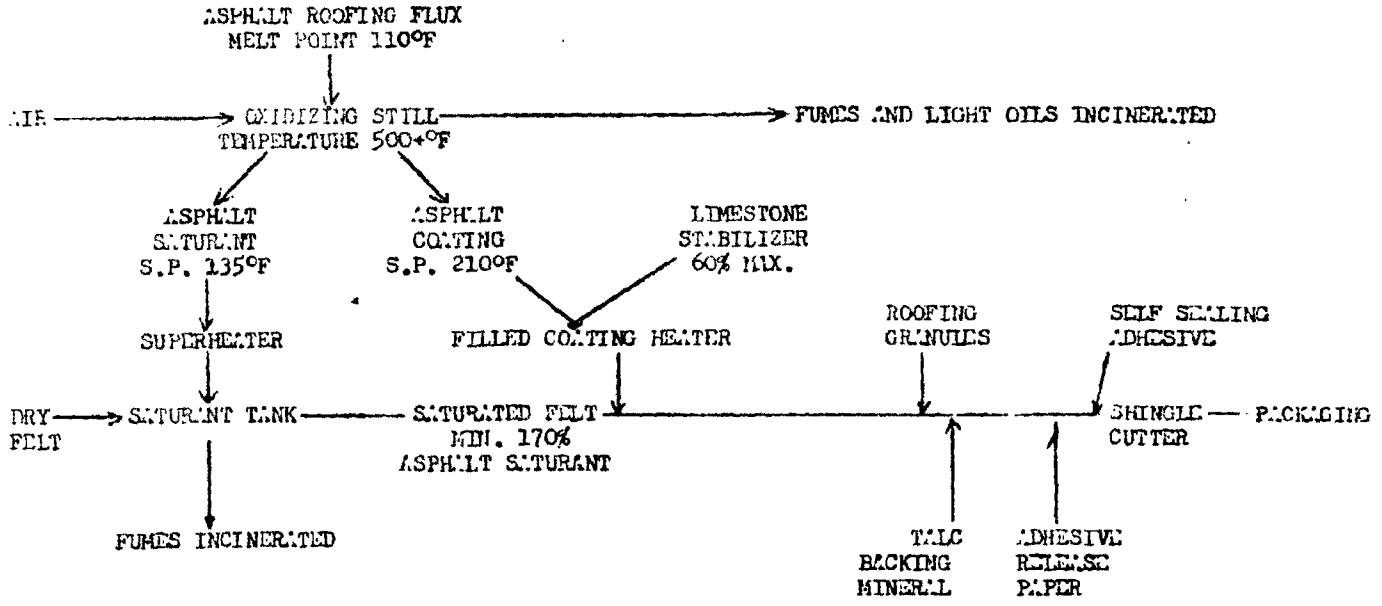
Therefore, observations of visible emission could not be made. CDEP had inspected this facility on 1/20/77 and found Tilo Company to be in compliance with all SIP requirements. All processes appeared to be properly controlled and all equipment was well maintained. No EPA enforcement action will be necessary. CDEP should continue to survey this facility on an annual basis.

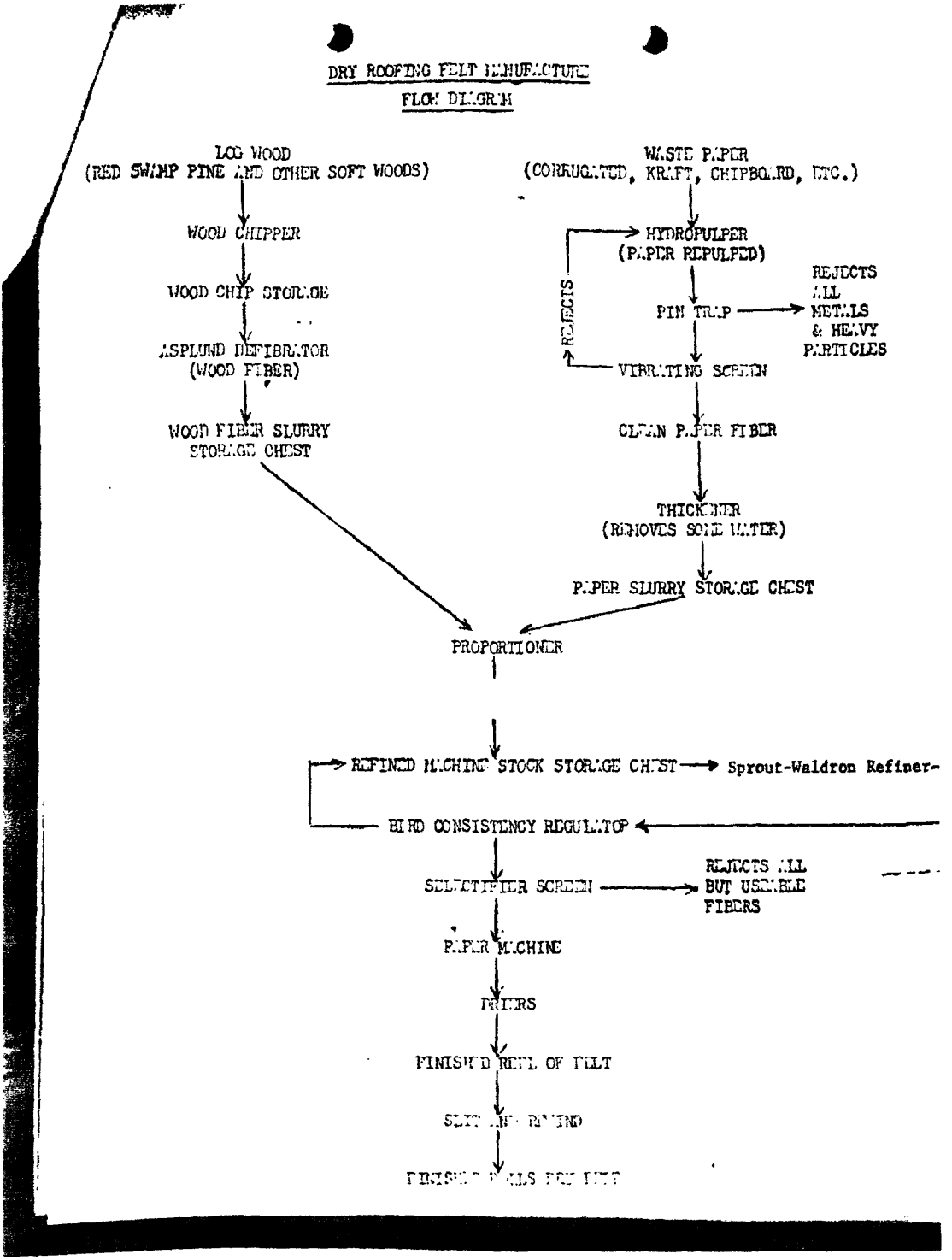
DRY ROOFING FELT MANUFACTURE

FLOW DIAGRAM

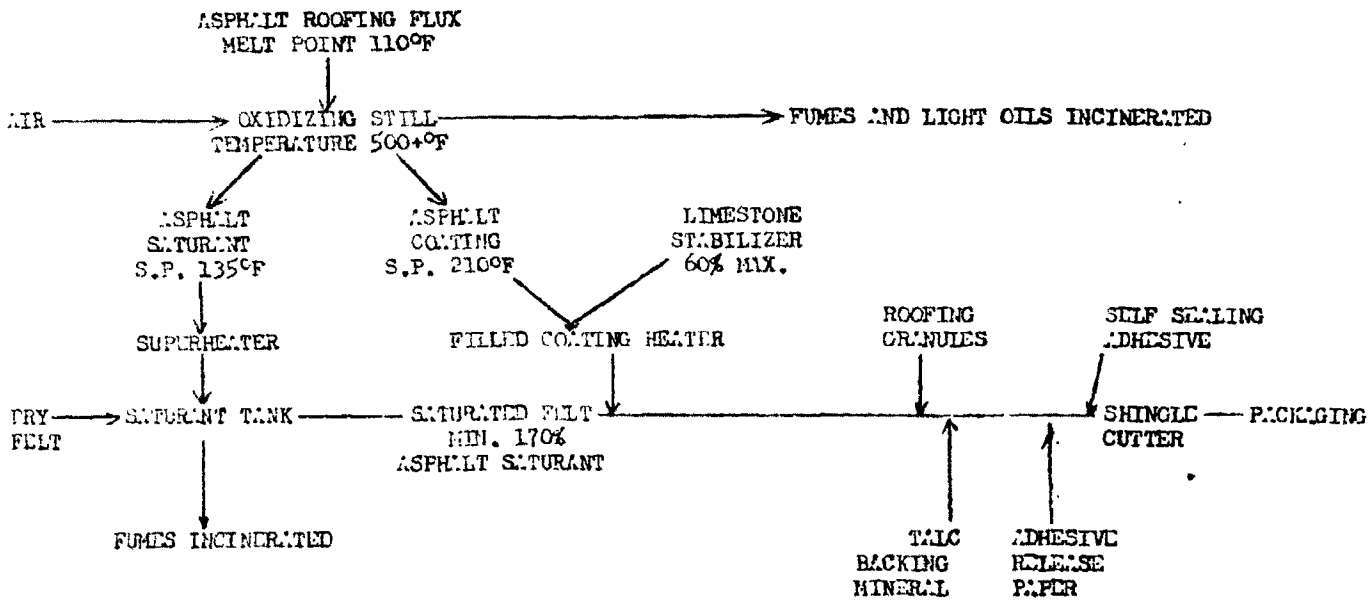


ASPHALT ROOFING SHINGLE MANUFACTURE
FLOW DIAGRAM




DRY ROOFING FELT MANUFACTURE
FLOW DIAGRAM
LOG WOOD
(RED SWAMP PINE AND OTHER SOFT WOODS)
WOOD CHIPPER
WOOD CHIP STORAGE
ASPLUND DEFIBRATOR
(WOOD FIBER)
WOOD FIBER SLURRY
STORAGE CHEST
WASTE PAPER
(CORRUGATED, KRAFT, CHIPBOARD, ETC.)
HYDROPULPER
(PAPER REPULPED)
REJECTS
PIN TRAP
REJECTS ALL METALS & HEAVY PARTICLES
VIBRATING SCREEN
CLEAN PAPER FIBER
THICKENER
(REMOVES SOME WATER)
PAPER SLURRY STORAGE CHEST
PROPORTIONER
REFINED MACHINE STOCK STORAGE CHEST
Sprout-Waldron Refiner-
BIRD CONSISTENCY REGULATOR
SELECTIFIER SCREEN
REJECTS ALL BUT USEABLE FIBERS
PAPER MACHINE
DRIERS
FINISHED ROLL OF FELT
SLITTING REWIND
FINISHED ROLLS FOR USE

ASPHALT ROOFING SHINGLE MANUFACTURE
FLOW DIAGRAM



Reynolds Aluminum Building Products