

RECEIVED

NOV 09 1995

SUPERFUND DIVISION

PEPER, MARTIN, JENSEN, MAICHEL AND HETLAGE
ATTORNEYS AT LAW

2080 MCGREGOR BOULEVARD
THIRD FLOOR
FORT MYERS, FLORIDA 33901-3418
(844) 337-3850

720 WEST MAIN STREET
BELLEVILLE, ILLINOIS 62220-1515
(618) 234-9574

TWENTY-FOURTH FLOOR
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101-2396

(314) 421-3850
TELECOPY: (314) 621-4834

1825 WEST MARION AVENUE
PUNTA GORDA, FLORIDA 33950-5285
(941) 637-1955

850 PARK SHORE DRIVE
SUITE 202
NAPLES, FLORIDA 33940-3587
(941) 261-6525

WRITER'S DIRECT DIAL NUMBER

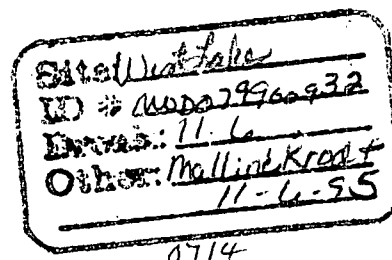
(314) 444-6452

November 6, 1995



40045838
SUPERFUND RECORDS

Steven Kinser, Project Manager
U. S. Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101



Re: ***Supplemental Response to 104(e) Information Request
West Lake Landfill; Bridgeton, Missouri***

Dear Mr. Kinser:

This response is a supplement made on behalf of Mallinckrodt Group, Inc., formerly known as Mallinckrodt, Inc., ("Mallinckrodt") to an Information Request sent by Robert L. Morby, with regard to the West Lake Landfill Site ("West Lake") located in Bridgeton, Missouri. The U.S. Environmental Protection Agency ("EPA") issued this Request on February 11, 1994 pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"). Mallinckrodt initially responded to the Request on March 22, 1994.

Without waiving any of the objections raised in Mallinckrodt's earlier response, Mallinckrodt now supplements its original response as a result of new information discovered subsequent to Mallinckrodt's initial response.

Request No. 1

Without waiving its previous objection to this Request, Mallinckrodt supplements its earlier response to Request No. 1 because of new information. Mallinckrodt states that its subsidiary, Mallinckrodt Chemical, Inc. ("MCI") operates a specialty chemical and pharmaceutical manufacturing facility at 3600 N. Second Street, St. Louis, Missouri, from which one shipment of non-hazardous demolition debris was mistakenly shipped to the West Lake Landfill on March 1, 1995.

Request No. 2

Without waiving its previous objection to this Request, Mallinckrodt supplements its earlier response to Request No. 2 because of new information.

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(2.a)

Mallinckrodt states that one shipment (Shipment No. 1567) of non-hazardous building demolition debris from Building 91 was mistakenly transported from its St. Louis facility to the West Lake Landfill on March 1, 1995. Although the approved landfill for this material was Browning-Ferris Industries' Missouri Pass Landfill at 2520 Adie Road in Maryland Heights, Missouri, the material was for some unknown reason transported by Able Industries (a.k.a Johnny on the Spot) to the West Lake Landfill without Mallinckrodt's approval.

(2.b)

Mallinckrodt states that the material giving rise to this Supplemental Response was non-hazardous building demolition debris.

(2.c-e)

Mallinckrodt states that the amount of non-hazardous building demolition debris sent to the site was approximately twenty (20) cubic yards. A twenty (20) cubic yard dumpster was used to contain the materials eventually mistakenly disposed of at the West Lake Landfill.

(2.f-g)

Mallinckrodt states that the Environmental Services Department at its St. Louis facility arranged for the pick up, transport and disposal of this material with Able Industries and Browning-Ferris Industries. The disposal of this material in the West Lake Landfill was not approved by Mallinckrodt — the Browning-Ferris Industries Missouri Pass Landfill in Maryland Heights, Missouri was the disposal facility designated and approved by Mallinckrodt for receipt of this material. It is unknown by Mallinckrodt why Able Industries, 7151 N. Market, St. Louis, Missouri transported the materials to the West Lake Landfill.

Request No. 3

Without waiving its previous objections to this Request, Mallinckrodt further supplements its response to Request No. 3 because of new information. Mallinckrodt states that no analysis was performed in regard to this load of demolition debris transported from its St. Louis facility.

Request No. 4

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 4 because of new information. Mallinckrodt states that the Environmental Services Department at its St. Louis facility arranged for the pickup, transport and disposal of the building demolition debris with Able Industries and Browning-Ferris Industries.

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Request No. 5

Without waiving its previous objections to this Request, Mallinckrodt further supplements its response to Request No. 5 because of new information. Mallinckrodt states that it has not performed and has not had performed any study or investigation to determine the existence and extent of contamination at or near the site other than an internal investigation to supplement this Request. Furthermore, attempts by Mallinckrodt to remove this material from the West Lake Landfill were unsuccessful as the material could not be located within the landfill.

Request No. 6

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 6 because of new information. With respect to the building demolition material giving rise to this Supplemental Response, Mallinckrodt states that no permit or other authorization was obtained nor required for disposal of this material.

Request No. 7

Without waiving its previous objection to this Request, Mallinckrodt further supplements its response to Request No. 7 because of new information. Mallinckrodt states that it issued a purchase order dated November 10, 1994, which was revised December 9, 1994 and January 10, 1995, to Able Industries to haul debris from a plant project which is attached as document number 001. The manifest for the disposal of this waste, designating BFI's Missouri Pass landfill as the receiving facility, is enclosed as document number 002. Able Industries' work order is attached as document number 003. The work order indicates the material is to be dumped at a Laidlaw landfill. However, the identity of the person who signed the work order authorizing disposal is unknown to Mallinckrodt at this time and may be a representative of a Mallinckrodt construction contractor (Rhodey & Son).

* * * * *

If you have any questions with regard to the foregoing, please contact Patricia Hitt Duft, Senior Attorney at Mallinckrodt Chemical, Inc., at (314) 530-2314.

Sincerely yours,



Cathleen S. Bumb

Enclosures

cc: Patricia Hitt Duft, Esq.

DENNIS A. CRANKO

00703381040500000000

HOLLY MYERS Z3

E-503

AREA 2 503

01

Area: 00013

Cost Code: 80

Project: 7314

**MALLINCKRODT
CHEMICAL**

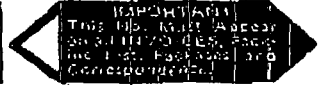
Send Invoice in Triplicate to:

Mallinckrodt Chemical, Inc.

3440 N. Broadway, St. Louis, MO 63147
Ph: (314) 333-2000 or (314) 333-1248
*** See Text ***

Date: 10/24/94

Purchase Order No.: E 7314-1012



SELLER:

ASLE INDUSTRIES
Becky Sansom
7151 N. MARKET
ST. LOUIS MO 63138

PURCHASE ORDER

Mallinckrodt Chemical, Inc.

SEE TEXT

3440 N. Broadway, St. Louis, Mo. 63147

210 Salisbury, St. Louis, Mo. 63147

BEST WAY

NET 30 DAYS

S.P.

DATE REQUIRED

If lower transportation charges result, Mallinckrodt hereby authorizes the use of ICC relaxed rates.

Exempt from Sales Tax
SEE TEXT

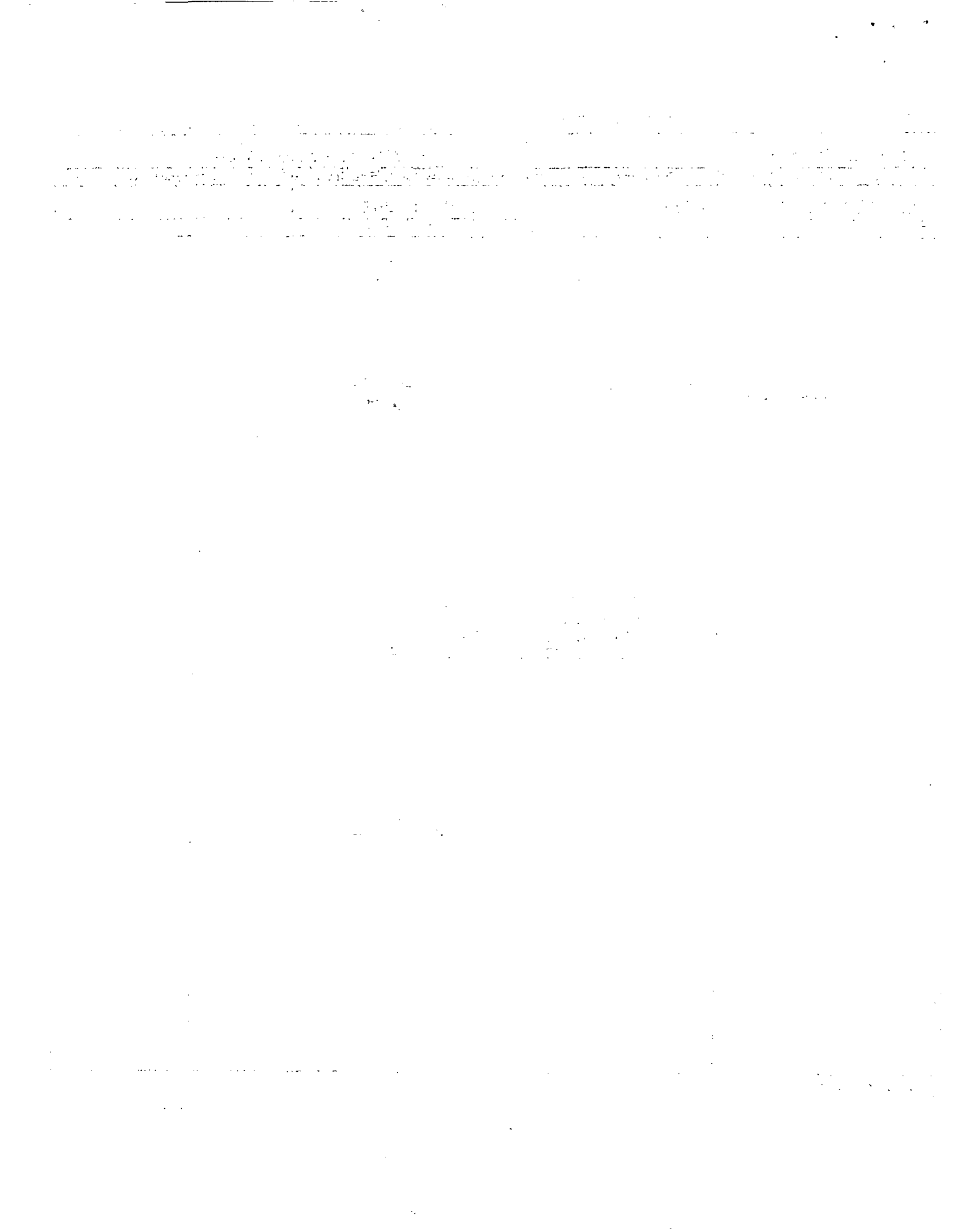
ITEM	QUANTITY	DESCRIPTION	PRICE
A	1	<p>CONFIRMING ORDER TO BECKY ON 10/20/94</p> <p>T&M FOR ROLL-OFF BOXES TO STORE EXCAVATED MATERIAL. DELIVER TO BLDG. 503 ON REQUEST. AFTER LOADING, THEY WILL BE STORED ON-SITE FOR SEVERAL DAYS. THEN TRANSPORT THEM TO LANDFILL OR BACK TO JOBSITE AS DIRECTED. INV VANZUMMEREN WITH SG&Y OR J. SKARIN FROM MALLINCKRODT WILL REQUEST BOXES AS NEEDED.</p> <p>VERBAL QUOTE ON PRICES FROM BECKY ARE \$75.00/HOUR FOR MOVEMENTS AND \$10.00/DAY DEMURRAGE PER ROLL-OFF BOX.</p> <p>COST NOT TO EXCEED \$5,000.00.</p> <p style="text-align: right;">P/O TOTAL: \$5,000.00</p> <p>SEND INVOICE TO:</p> <p style="text-align: center;">CONTINUED ON PAGE 2</p>	\$5,000.00

Special Instructions:

Mallinckrodt Chemical, Inc. (Buyer)
St. Louis Plant
Purchasing Department

Authorized Signature

001



DENNIS A. ORNIG		Account No. 007035R10-000000000	
Buyer Name	Buyer No.	Work Order	Deposition No.
COLLY MYERS 23	B-503	AREA 2 503	
01	Area: 00013 Cost Code: 80 Project: 7314		

MALLINCKRODT CHEMICAL
 Send Invoice in Triplicate to:
 Mallinckrodt Chemical, Inc.
 P. O. Box 5439, St. Louis, MO 63147
 Ph. (314) 336-2000 Fax (314) 336-1248
 *** See Text ***

Date: 10/24/94
 Purchase Order No. E 7314-1012

IMPORTANT
 This is. Must Appear on all INVOICES, PACKING SLIP, PACKING and Correspondence

SELLER:
 ABLE INDUSTRIES
 Becky Sanson
 7151 N. MARKET
 ST. LOUIS MO 63133

PURCHASE ORDER

Mallinckrodt Chemical, Inc.
 SEE TEXT
 3440 N. Broadway, St. Louis, Mo. 63147
 210 Salisbury, St. Louis, Mo. 63147

SHIP BY	TERMS	FRS	DATE REQUIRED
BEST WAY	NET 30 DAYS	E.P.	<input type="checkbox"/> Exempt from Sales Tax <input checked="" type="checkbox"/> SEE TEXT

ITEM	QUANTITY	DESCRIPTION	PRICE
		614/853-8788 MALLINCKRODT CHEMICAL, INC. P. O. BOX 5439 ST. LOUIS, MO 63147 ATTN: VICTORIA KIZILE, Z-4	

Special Instructions:

Mallinckrodt Chemical, Inc. (Buyer)
 St. Louis-Plant
 Purchasing Department

[Signature]
 Authorized Signature

Req. No.	Job Location	Account No.	Work Order	Project No.	Task	Cost Code	Seq.
Molly Myara	7-3	314-599-1548	B-503				
AREA 2 503		007-03-381-0405-0000-0000		PRE07314-00000013-8005			01012

MALLINCKRODT CHEMICAL

Send Invoice to:

MALLINCKRODT CHEMICAL, INC.
 ATTN: VICKI KEZELE
 P.O. BOX 5439
 ST. LOUIS MO 63147

PURCHASE ORDER

Date	Purchase Order No.
12/09/94	CHANGE ORD# 1 017501-DAC-01
PO Type	IMPORTANT
RNG	The above info. must appear on all INVOICES, Packing Lists, Packages, and Correspondence.

SELLER:

3148638755

110102

ABLE INDUSTRIES
 Becky Sansom
 7151 N. MARKET
 ST. LOUIS MO 63139

P.O. 10

MALLINCKRODT CHEMICAL, INC.
 MECHANICAL RECEIVING
 210 SALISBURY ST
 SAINT LOUIS MO 63147

ROUTING	TERMS	P.O.B.	TAX STATUS	BLANKET NO.	DATE REQ.
BEST WAY	NET 30 DAYS	Shipping Point	TAXABLE		9/00/00

LINE NO.	QUANTITY	DESCRIPTION	PRICE
20	1 LT	<p>This is a summary of changes made on 12/09/94.</p> <p>Vendor please note, the PO number has been changed from 7314-1012 to 017501. Please indicate the new number on all documentation.</p> <p>The PO taxation status was changed.</p> <p>Line 20 has been added.</p> <p>ADDITIONAL T&M FOR ROLL-OFF BOXES TO STORE EXCAVATED MATERIAL.</p> <p>TOTAL COST NOT-TO-EXCEED \$20,000.00</p> <p>ALL OTHER TERMS AND CONDITIONS SHALL REMAIN THE SAME AS ON THE ORIGINAL PURCHASE ORDER.</p> <p>THE MONETARY CONSIDERATION IS CHANGED FROM \$5,000.00 TO \$20,000.00.</p>	15,000.0000 LT

Special Instructions:

Mallinckrodt Chemical, Inc. (Buyer)
 St. Louis Plant
 Purchasing Department

[Signature]
 Authorized Signature

DENNIS A. CRNEO

P.4/9

Req. No.	Job Location	Account No.	Work Order	Project No.	Task	Cost Code	Seq
	AREA 2 503	007-03-381-0405-0000-0000		PR07314-00000013-8005			01012

MALLINCKRODT CHEMICAL

Send Invoice to:
MALLINCKRODT CHEMICAL, INC.
 ATTN: VICKI KRZELE
 P.O. BOX 6438
 ST. LOUIS MO 63147

PURCHASE ORDER

Date	Purchase Order No.
1/10/95	CHANGE ORD# 2 017501-DAC-01
PO type	IMPORTANT
XWG	The above PO must appear on all INVOICES, Packing List, Package 2, and Correspondence.

SELLER: 3148638755 110102

ABLE INDUSTRIES
 Becky Sansom
 7151 N. MARKET
 ST. LOUIS MO 63133

O.T.P.H.

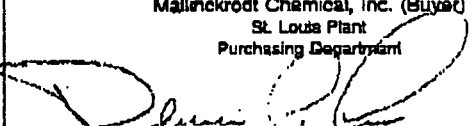
MALLINCKRODT CHEMICAL, INC.
 MECHANICAL RECEIVING
 210 SALISBURY ST
 SAINT LOUIS MO 63147

ROUTING	TERMS	F.O.B.	TAX STATUS	BLANKET NO.	DATE REQ.
BEST WAY <small>lower transportation charges result Mallinckrodt hereby authorizes the use of ICC released rates.</small>	NET 30 DAYS	Shipping Point	TAXABLE		0/00/00

LINE NO.	QUANTITY	DESCRIPTION	PRICE
30	1 LT	<p>This is a summary of changes made on 01/10/95.</p> <p>Vendor please note, the PO number has been changed from 7314-1012 to 017501. Please indicate the new number on all documentation.</p> <p>Line 30 has been added.</p> <p>ADDITIONAL T&M FOR STORAGE AND HAULING OF SPECIAL WASTE FOR B503.</p> <p>THE TOTAL COST IS NOT-TO-EXCEED \$25,000.00</p> <p>ALL OTHER TERMS AND CONDITIONS SHALL REMAIN THE SAME AS ON THE ORIGINAL PURCHASE ORDER.</p> <p>THE MONETARY CONSIDERATION IS CHANGED FROM \$20,000.00 TO \$25,000.00.</p>	5,000.0000 LT

Special Instructions:

Mallinckrodt Chemical, Inc. (Buyer)
 St. Louis Plant
 Purchasing Department


 Authorized Signature
DENNIS A. CRNK

002

MARCH 1, 1995

Name of Authorized Agent
Signature
I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

Designated Facility Name & Site Address
Browning-Ferris Ind. MO Pass Landfill
2520 Adle Road
Maryland Heights MO 63043
Phone (314) 993-0477

DEBRIANON
Driver Signature
Shipper Signature
I hereby certify that the above named material was picked up at the generator site listed above.
I hereby certify that the above named material was delivered without incident to the destination listed above.

Generator Name and Address
JOHN N. MARKET
ST. LOUIS MO 63133
Phone (314) 863-0733
Driver Name (Print)
Vehicle License No. State
Vehicle Certification

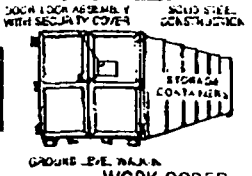
TRANSPORTER
Generator Authorized Agent Name
Signature
Shipper Signature
I hereby certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law, is not a hazardous waste as defined by CERCLA Part 261 of any applicable state law, has been properly classified and

Description of Waste	Approval Code	Cubic Yards	20.00	20.00	2675/5,000
BUILDING DEBRIS (4/1/95)	1284-B930				
SHIPMENT TOTAL					

Generator Name and Location
Hallmark Chemical, Inc.
3600 N. Second St.
St. Louis MO 63147
Generator Name and Address
891 Box 2143
Bldg
Shipments: 01567



SITE SERVICES



WORK ORDER
No. 57954

(93) 840

NO. 1-091486

WORK ORDER

SEP 21 95 15:21 NO. 017 P. 03 TEL: 314-862-5452

Emergency Service Company

T. LOUIS, MO 314/863-8874 ST. CHARLES, MO 314/723-6097
OLLINSVILLE, IL 618/344-1242 COTTAGE HILLS, IL 618/259-3608

DELIVERY SERVICE AND PLACEMENT AUTHORIZATION WORK ORDER

CUSTOMER Proby's Son DRIVER NO: 93
DATE 2-1-95 TIME MAR 14 1995 a.m./p.m. 9853-6

TIME LEFT GATE AT SHOP _____ a.m./p.m. TIME ARRIVED AT SHOP _____ a.m./p.m.

PROJECT LOCATION Mallinckrodt

TIME ARRIVED 1035 a.m./p.m. TIME DEPARTED 1110 a.m./p.m.

WEATHER _____ HOW MANY CONTAINERS ON JOB? _____

NEW DELIVERY CONTAINER NO'S 258 PICK-UP CONTAINER NO'S 214344

PUMP AND RETURN CONTAINER NO'S _____ ZONE 1

CUSTOMER OWNED CONTAINERS YES NO

CONTAINER SIZE 20 DUMPED AT LANDFILL NAME Madison

TIME ARRIVED AT LANDFILL _____ a.m./p.m. TIME DEPARTED LANDFILL _____ a.m./p.m.

CONTAINER COULD NOT BE PULLED, BROUGHT TO SHOP OR TAKEN FROM SHOP TO CUSTOMER OR LANDFILL, EXPLAIN IN COMMENT SECTION

COMMENTS _____

RECEIVED IN GOOD CONDITION YES NO DAMAGED YES NO COMMENTS _____

PERMITS AND DRIVEWAY ACCESS: Customer warrants that it shall secure and maintain all necessary permits and that Contractor shall have the right to place Containers in the locations designated by Customer. Customer also warrants that the right of way between use locations and the public right of way will at all times be (a) clear so that Contractor may provide service hereunder, and (b) sufficient to bear the weight of all of Contractor's vehicles and equipment, and that Contractor shall have the right to use such right of way in providing service hereunder. Contractor shall not be liable for any damage to pavement or other driving surfaces, or to curbs, resulting from Contractor's providing of service hereunder.

AUTHORIZATION FOR PLACEMENT AND/OR SERVICE LOAD LIMIT 22,000 LBS.

CUSTOMER Paul Barow TITLE _____

SERVICED BY Dang FOREMAN ON JOB _____

IF NOT SIGNED, GIVE REASON _____

TIME IN _____ a.m./p.m. SALE/QUOTE/RENTAL

DATE 3-1-95 PER _____

PHONE NO. 1 1539-5888 DEL./P.U. DATE _____

BILL TO Rhodesy

ADDRESS _____

P.O. NO. _____ JOB NO. _____

COST CODE _____ ORDER WRITTEN BY Janey

DELIVER Mallinckrodt
Building # 96

PICK-UP Dump & Return 20yd.
ASAP

DRIVER'S REPORT _____

DATE _____