



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1 – NEW ENGLAND  
5 POST OFFICE SQUARE – SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT LEGAL MATTER – PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

February 8, 2011

Katherine L. Adams, Esq.  
Senior Vice President and General Counsel  
Honeywell International, Inc.  
101 Columbia Road  
Morristown, New Jersey 07962

Re: Notice of Potential Liability and CERCLA Section 104(e) Request for Information  
Former Bendix Property Superfund Site (Former Besly/Bendix Products Site), Greenfield,  
MA

Dear Ms. Adams:

This letter serves to notify Honeywell International, Inc. (“you”) of potential liability regarding the Former Bendix Property Superfund Site (“Site”), as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act (“CERCLA”), commonly known as the federal “Superfund” law. 42 U.S.C. § 9607(a). This letter also notifies you of planned removal activities at the Site which you are invited to perform or finance and which you may be ordered to perform at a later date.

Under CERCLA, the U.S. Environmental Protection Agency (“EPA”) is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment, i.e., for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. EPA has documented that such a release has occurred at the Site located at 180 Laurel St., Greenfield, MA. The property is fully described by the Town of Greenfield Assessor’s Office on Map R41, Lot 2 and on a deed identified at the Franklin County Registry of Deeds in Book 1123, Page 247.

Hazardous substances involved in the release or threat of release of hazardous substances at the Site include, but are not limited to: friable asbestos, asbestos-containing material (“ACM”), chromium, and volatile organic compounds (“VOCs”). EPA is considering spending public funds to investigate and address the releases and/or threatened releases at the Site. Based on information presently available to EPA, EPA has determined that you may be a potentially responsible party under CERCLA for the cleanup of the Site, which you are invited to perform or finance and which you may be ordered to perform at a later date. Unless a potentially responsible party (“PRP”) or parties commit to properly performing or financing such actions, EPA will perform these actions pursuant to Section 104 of CERCLA, 42 U.S.C. § 9604.

### EXPLANATION OF POTENTIAL LIABILITY

Under CERCLA, specifically Sections 106 and Section 107(a), 42 U.S.C. §§ 9606(a) and 9607(a), Section 7003 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6973, and other laws, PRPs may be required to implement cleanup actions deemed necessary by EPA to protect public health, welfare, or the environment. PRPs may also be responsible for all costs incurred by the Government in responding to any release or threatened release of hazardous substances at the Site, unless the PRPs can show divisibility or any of the other statutory defenses. Such actions and costs may include, but are not limited to: expenditures for investigations, planning, response, disposal, oversight, and enforcement activities.

PRPs include current and former owners and operators of a Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the Site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on information collected, EPA believes that you are a PRP under Section 107(a) of CERCLA with respect to the Site. Specifically, EPA has reason to believe that you, as a previous owner and/or operator of the Site, and/or as successor to previous owners and/or operators of the Site, have potential liability for the Site. You are urged to voluntarily perform or finance those response activities that EPA determines are necessary at the Site.

### INFORMATION REQUEST

EPA is investigating the release or threat of release of hazardous substances, pollutants and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or from the Site, generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the contamination at the Site and their ability to reimburse the government for its response costs.

Pursuant to the authority of Section 104 of CERCLA, 42 U.S.C. § 9604, you are hereby requested to respond to the Information Request set forth in Enclosure A to this letter. Instructions and definitions for the Information Request are in Enclosure B.

Compliance with the Information Request set forth in the Enclosure A is mandatory and you have an affirmative duty to obtain the information requested, whether or not it is readily available. Failure to respond fully and truthfully to the Information Request, or to adequately justify such failure to respond, may result in an enforcement action by EPA pursuant to Section 104(e) of CERCLA which permits EPA to seek the imposition of penalties of up to thirty-seven thousand five hundred dollars (\$37,500) for each day of continued noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

### **OUTLINE OF SITE RESPONSE ACTIVITIES**

To date, EPA has taken the following response actions at the Site under the authority of the Superfund Program: a Preliminary Assessment (“PA”) and Site Investigation (“SI”) in order to gain a basic understanding of any risks posed to human health and/or the environment by releases or threatened releases from the Site.

Due to the presence of hazardous substances at the Site, and in light of other factors, EPA has determined that there is an imminent and substantial endangerment to public health, welfare, or the environment. In response, EPA plans to conduct the following immediate removal activities: 1) secure the Site to prevent unauthorized access; 2) evaluate the structural integrity of the roof to determine stability and potential for collapse; 3) stabilize structurally unsafe roof areas; 4) conduct the removal and disposal of asbestos and asbestos contaminated material; 5) collect and stage all drums and containers at the Site, inspect and conduct hazardous waste categorization of contents, and containerize and ship any hazardous materials found offsite to EPA-approved facilities; 6) conduct a visual inspection of the building for mercury-containing switches, and containerize and ship any mercury found offsite to EPA-approved facilities.

### **INVITATION TO PERFORM SITE RESPONSE ACTIONS**

Before EPA spends public funds to undertake the removal action at the Site, EPA urges you to participate in removal activities or finance all the removal activities outlined above. Any such work performed by you in your capacity as a PRP may be conducted pursuant to an administrative order and an EPA-approved work-plan as authorized by Section 106(a) of CERCLA, 42 U.S.C. § 9606(a). Prior to final issuance of such an order, a draft order would be sent to you or your representative for review and comment. Enclosed is a copy of a summary of a generic Scope of Work (Enclosure C). This document should provide an understanding of the types of plans and activities typically required by such an Order.

Be advised that even if you do not indicate a willingness to perform or finance necessary response actions, EPA explicitly reserves any rights it may have to order you to undertake such actions under Section 106 of CERCLA 42 U.S.C. §§ 9606. Failure to comply with a Section 106(a) administrative order may result in a fine of up to \$37,500 per day under Section 106(b) or imposition of treble damages under Section 107(c)(3) of CERCLA. Further, you may be held liable under Section 107(a) for the cost of response activities EPA performs at the Site and for any damages to natural resources. In addition, by virtue of Section 113 of CERCLA, 42 U.S.C. § 9613, other PRPs who agree to perform the necessary response action may seek contribution protection.

**FINANCIAL CONCERNS/ABILITY TO PAY SETTLEMENTS**

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a Site may be substantially limited. If you believe, and can document, that you fall within that category please contact Joy Sun listed below for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements. You will be asked to fill out form(s) about your finances and to submit financial records including business and personal federal and state income tax returns. If EPA concludes that you have a legitimate inability to pay the full amount of EPA's costs, EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that, because EPA has a potential claim against you, you must include EPA as a creditor if you file for bankruptcy. EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

**PRP RESPONSE AND EPA CONTACT**

You should contact EPA within **ten (10) business days** after receipt of this letter to indicate your willingness to perform or finance the response activities outlined above. If EPA does not receive a response within that time, EPA will assume that you do not wish to negotiate a resolution of your liabilities in connection with the response and that you have declined any involvement in performing response activities. Be advised, however, that liability under CERCLA is joint and several; therefore, each PRP is potentially liable for undertaking all response actions or reimbursing the Government for the entire amount of its response costs.

Also please send a written response to the Information Request and provide all supporting documentation within **twenty-one (21) days**, to Donna Murray at the address below.

Please provide the name, address and telephone number of a designated contact for future communications. Your written response, including any technical comments or questions concerning the proposed response activities should be directed to the EPA On-Scene Coordinator ("OSC") or the Enforcement Specialist for the Site:

Athanasios Hatzopoulos, On-Scene Coordinator  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 100 (OSRR02-2)  
Boston, Massachusetts 02109-3912  
(617) 918-1284

Donna Murray, Enforcement Specialist  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 100 (OSRR07-2)  
Boston, Massachusetts 02109-3912  
(617) 918-1409

Legal questions and all communications from counsel should be directed to:

Joy Sun, Enforcement Counsel  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 100 (ORA17-1)  
Boston, Massachusetts 02109-3912  
(617) 918-1018

### **DECISION NOT TO USE SPECIAL NOTICE**

Under Section 122(e) of CERCLA, 42 U.S.C. § 9622(e), EPA has the discretionary authority to invoke special notice procedures to formally negotiate the terms of an agreement between EPA and the PRPs to conduct or finance response activities. The use of special notice procedures triggers a moratorium on certain EPA activities at the Site while formal negotiations between EPA and the PRPs are conducted.

Due to the exigencies posed by conditions present at the Site, removal activities must be conducted as expeditiously as possible. EPA has therefore decided not to invoke the Section 122(e) special notice procedures with respect to CERCLA removal actions at this Site. Nonetheless, EPA is willing to discuss settlement opportunities without invoking a moratorium, but will continue the response action as planned unless such discussions lead expeditiously to a settlement.

### **ADMINISTRATIVE RECORD**

Pursuant to Section 113(k) of CERCLA, 42 U.S.C. § 9613(k), EPA will establish an administrative record containing documents that serve as the basis of EPA's decision on the selection of a cleanup action for the Site. The Administrative Record files may be inspected and comments may be submitted by contacting the OSC for the Site, Athanasios Hatzopoulos, at the above address.

The Administrative Record files with corresponding index should be available for inspection at a repository near the Site within sixty (60) days of initiation of on-site removal activities, as well as the Superfund Records Center, U.S. EPA, 5 Post Office Square, Suite 100, Boston, MA 02109-3912, (617) 918-1440.

### **SITE ACTIVITY OUTSIDE EPA ACTIONS**

If you are already involved in discussions with state or other local authorities or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise or direct you to restrict or discontinue any such activities. However, you are advised to report the status of any such discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions.

**PURPOSE AND USE OF THIS NOTICE**

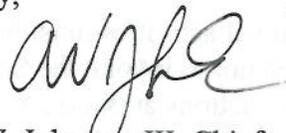
The factual and legal discussions contained in this letter are intended solely to provide notice and information. Such discussions are not intended to be, and cannot be, relied upon as EPA's final position on any matter set forth herein.

Please give these matters your immediate attention and consider consulting with an attorney. If you have any questions regarding this letter, please contact Joy Sun at the above number.

By copy of this letter, EPA is notifying the State of Massachusetts and the Natural Resources Trustees of EPA's intent to perform, or to enter negotiations for the performance or financing of, response actions at the Site.

Thank you for your prompt attention to this matter.

Sincerely,



Arthur V. Johnson, III, Chief  
Emergency Planning & Response Branch

Enclosures

cc: Ben Fish – MA DEP  
Andrew Raddant, Regional Environmental Officer - U.S. DOI  
Ken Finkelstein, National Oceanic & Atmospheric Administration - NOAA  
Athanasios Hatzopoulos, EPA On-Scene Coordinator – OSRR-2-2  
Donna Murray, EPA Enforcement Specialist – OSRR07-2  
Joy Sun, EPA Enforcement Counsel – ORA17-1  
John Carlson – EPA Contracts Management – OSRR01-5  
Patti Ludwig, EPA CERCLIS Coordinator - OSRR01-5  
EPA Administrative Records Center – LIB01-2

**INFORMATION REQUEST FOR  
BENDIX (FORMER BENDIX PROPERTY) SUPERFUND SITE**

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**Period Being Investigated: 1961 to the Present**

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**NOTE: Unless otherwise indicated, all questions should be answered with respect to activities and operations of Threadwell Tap and Die Company, Bendix Corporation, Bendix Industrial Tool Division, B.C. Acquisition Corporation, Besly Products Corporation, and Allied Signal Incorporated.**

In addition to the questions which follow, this enclosure includes a declaration, a site description, detailed instructions for responding to this request, and definitions of words such as "Respondent(s)," "identify," and "waste" used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

1. Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
2. Answer all questions completely in accordance with the definitions and instructions.
3. Complete the enclosed declaration.
4. For each question, identify all persons and documents relied upon in the preparation of the answer.
5. All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.
6. This request imposes a **continuing obligation** upon you to submit responsive information discovered after your original response is submitted to EPA.

1. Contact Information

**NOTE: All questions in this section refer to the present time.**

- a. Provide the full legal name and mailing address of Respondent.
- b. For each person answering these questions on behalf of the Respondent, provide:
  - i. full name;
  - ii. title;
  - iii. business address; and
  - iv. business telephone number, FAX number and email address.
- c. If Respondent wishes to designate an individual for all future correspondence concerning the Site, including any legal notices, please provide that individual's name, address, telephone number, FAX number, email address and the designated individual's relationship to the Respondent.

2. Legal Information for Respondent.

**NOTE: All questions in this section refer to the period being investigated.**

- a. If Respondent has ever done business under any other name:
  - i. list each such name; and
  - ii. list the dates during which such name was used by Respondent.
- b. If Respondent is, or was at any time, a corporation, provide:
  - i. the date of incorporation;
  - ii. state of incorporation;
  - iii. the names of all officers during the period being investigated, including their titles and dates of office;
  - iv. the names of all directors during the period being investigated, including their titles and dates of office;
  - v. the names of all shareholders owning more than 5% of Respondent's stock any time during the period being investigated, including the dates during which such stock was owned; and
  - vi. the names and addresses of all parent and subsidiary entities affiliated with Respondent.
- c. If Respondent is, or was at any time during the period being investigated, a subsidiary

of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:

- i. a general statement of the nature of the relationship;
- ii. the dates such relationship existed;
- iii. the percentage of ownership of Respondent that is held by such other entity; and
- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.

d. Identify each of Respondent's predecessors-in-interest and/or successors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest and/or successors-in-interest.

e. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

- i. the titles and dates of the documents that embody the terms of such transactions (*i.e.*, purchase agreements, merger and dissolution agreements);
- ii. the identities of the seller, buyer, and any other parties to such transactions; and
- iii. a brief statement describing the nature of the asset purchases or mergers.

f. Provide any information regarding the relationship between, Threadwell Tap and Die, Bendix Industrial Tool Division, and B.C. Acquisition Corporation (Besly Products Corporation), and the relationship between the Respondent and the above named companies.

g. If Respondent has filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;
- ii. the docket numbers of such petition;
- iii. the date the bankruptcy petition was filed;
- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
- v. a brief description of the current status of the petition.

h. Please describe each and every contract, agreement, or other relationship Respondent has or had with Bendix Tool Division, B.C. Acquisition Corporation (Besly Products Corporation), SL Financial, and Repal, Inc. relating to, referring to or affecting the Site, including:

- i. a general statement of the nature of such contract(s), agreement(s) or relationship(s); and
- ii. the dates such contract(s), agreement(s) or relationship(s) existed.

3. Owners During Period Being Investigated:

**NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.**

- a. Identify (see Definitions) all owners of the Site or portions of the Site.
- b. For such owners of the Site or portions of it, provide a map or detailed narrative description of each such owner's property boundaries in relation to the Site's boundaries.
- c. State the beginning and ending dates of each such owner's ownership of the Site or portions of the Site.
- d. Provide copies of all documents in Respondent's possession indicating such ownership including but not limited to:
  - i. deeds;
  - ii. easements;
  - iii. liens;
  - iv. mortgages;
  - v. purchase and sale agreements;
  - vi. title insurance; and
  - vii. title search reports.
- e. Describe all activities undertaken at the Site by each such owner, including but not limited to:
  - i. a brief narrative of the day to day operation of the Site for every three-year period of ownership;
  - ii. a description of the Respondent's, as well as Respondent's predecessors', activities at the Site by date;
  - iii. a description of the generation, storage, placement, disposal or treatment of wastes at the Site by date;
  - iv. the identification of (see Definitions) contractors, tenants, or others who carried out operations at the Site;
  - v. a description of the activities each contractor or other took at the Site by date;
  - vi. a description of the collection of monies or other compensation for use of

- the Site by others;
- vii. a description of the construction, modification, and/or demolition of any surface or subsurface structures at the Site (including but not limited to the dates such activities took place); and
- viii. a description of any other significant operations or activities at the Site.

f. Provide all information you have, or you have reason to believe exists, which indicates that disposal, treatment, storage, or recycling of wastes occurred at the Site during the period that each such owner owned the Site.

g. Provide all information you have, or you have reason to believe exists, that during the period that each such owner owned the Site:

- i. the wastes disposed, treated, stored or recycled at the Site included hazardous substances; and
- ii. hazardous substances were released at the Site.

4. Lease(s)

**NOTE: All questions in this section refer to the period being investigated.**

a. Identify all lease(s), sublease(s), and all other written or oral agreements for the use and/or occupancy of the property within the Site boundaries, including:

- i. each lessor or landlord and each lessee or tenant of property within the Site;
- ii. the beginning and ending dates of each such arrangement; and
- iii. describe the specific real estate and/or buildings to which each such arrangement relates.

b. Provide copies of all documents related to each lease, sublease, or similar property interest of property within the Site boundaries, including but not limited to all documents reflecting the purpose or terms of each lease, sublease or similar property interest.

c. Describe all activities undertaken at the Site by each lessee/tenant including, but not limited to:

- i. a brief narrative of the day to day operation of the Site for every three-year period during the period being investigated;
- ii. a description of the activities at the Site by date;
- iii. a description of the generation, storage, placement, disposal or treatment of wastes at the Site;
- iv. the identification of (see Definitions) contractors, tenants, or others who

- v. carried out operations at the Site;  
a description of the activities each contractor or other took at the Site by date;
  - vi. a description of the collection of monies or other compensation for the use of the Site by others;
  - vii. a description of the construction and/or demolition of any surface or subsurface structures at the Site (including but not limited to the dates such activities took place); and
  - viii. a description of any other significant operations or activities at the Site.
- d. Provide a description of all hazardous materials used at the Site by each tenant or operator.
- e. Did any lessee/tenant ever use, purchase, generate, store, treat, dispose, or otherwise handle at the Site any hazardous substances? If the answer to the preceding question is anything but an unqualified "no," identify:

- i. in general terms, the nature and quantity of each such hazardous and non-hazardous substances so used, purchased, generated, stored, treated, disposed, or otherwise handled;
- ii. how each such hazardous substance was used, purchased, generated, stored, treated, disposed or otherwise handled;
- iii. when each such hazardous substance was used, purchased, generated, stored, treated, disposed or otherwise handled; and
- iv. where each such hazardous substance was used, purchased, generated, stored, treated, disposed or otherwise handled.

5. Respondent's Operations

**NOTE: All questions in this section refer to the period being investigated.**

- a. Describe all activities undertaken at the Site by Respondent for the full period being investigated, including but not limited to:
- i. a brief narrative of the day to day operation of the Site for every three-year period of ownership;
  - ii. a description of Respondent's activities by date;
  - iii. a description of the generation, storage, placement, disposal or treatment of wastes at the Site by date;
  - iv. the identification of (see Definitions) contractors, tenants or others who carried out operations at the Site;
  - v. a description of the activities each contractor or other took at the Site by date;

- vi. a description of the collection of monies or other compensation for use of the Site by others; and
- vii. a description of the construction, modification, and/or demolition of any surface or subsurface structures at the Site (including but not limited to the dates such activities took place); and a description of any other significant operations or activities at the Site.

b. Provide all information you have, or you have reason to believe exists, which indicates that disposal, treatment, storage or recycling of wastes occurred at the Site during Respondent's ownership.

6. Site Operations:

**NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.**

a. Describe the nature of the operations at the Site for every three-year period during the period being investigated.

b. State the beginning and ending dates of the Site's operation.

c. State the specific dates during which wastes were brought to the Site for use, storage, placement, treatment, recycling, or disposal.

d. Provide copies of all local, state, and federal permits or licenses for the operation of the Site and any facility on the Site, including but not limited to permits for the transport, receipt, generation, handling, mixing, reclamation, recycling, storage, or disposal of wastes.

e. List all Resource and Conservation Recovery Act (RCRA) identification numbers for the Site and facilities on the Site.

f. Provide copies of all documents which were created or kept of Site operations by owners, lessees, tenants, contractors, site managers, or others, including but not limited to:

- i. documents concerning the nature and volume of wastes generated or brought to the Site;
- ii. documents concerning the dates wastes were generated or brought to the Site;
- iii. documents concerning where wastes were placed or disposed at the Site;
- iv. documents concerning the entities and individuals who generated or brought wastes to the Site.

g. Describe each type of waste brought to or generated at the Site during its operation, including but not limited to:

- i. the name of each type of waste;
- ii. the chemical composition of each type of waste;
- iii. the color of each type of waste;
- iv. the odor of each type of waste;
- v. the physical state of each type of waste (e.g. liquid, solid, sludge);
- vi. whether the waste was hazardous, toxic, flammable, reactive, corrosive, or was otherwise a hazardous substance; and
- vii. the dates (beginning & ending) during which each type of waste was produced by Respondent's, or Respondent's predecessors', operations.

h. Provide all documents which indicate that the chemical compositions of the wastes brought to or generated at the Site were hazardous, toxic, flammable, reactive, corrosive, or were otherwise hazardous substances.

i. State the approximate quantity of each type of waste brought to or generated at the Site by year.

j. Complete the enclosed "Waste Survey," Enclosure D, checking each substance present in Respondent's, or Respondent's predecessors' wastes or by-products and providing all requested information for each such substance that is checked.

k. Describe in general how and where each type of waste was handled or placed at the Site (e.g., drums were emptied into a specific pit and immediately returned to a waste carrier, drums were dumped directly into an area without being emptied).

l. If different types of waste were disposed/treated/stored or generated in specific areas:

- i. describe where specific types of wastes were disposed/treated/stored/generated at the Site;
- ii. indicate when those wastes were disposed/treated/stored/generated there; and
- iii. provide a sketch indicating where each type of waste was disposed/treated/stored/generated.

m. Describe any manufacturing, recycling, recovery, or other industrial or chemical processes involved in Site operations during the period being investigated. Provide schematic diagrams or flow charts of such processes.

n. For each legal action brought against current or prior owners, tenants, or site

operators/managers of the Site regarding Site operations, permitting, or environmental matters, provide:

- i. the caption name, jurisdiction, and docket number (e.g., U.S. v. Owner (D.N.H. 92-003));
- ii. the date such action was initiated;
- iii. the names of parties to the action; and
- iv. the final disposition or current status of the action.

7. Site Characteristics

**NOTE: All questions in this section refer to the period being investigated, unless otherwise indicated.**

a. Describe the physical layout and characteristics of the property, for each three-year period during the period being investigated, including but not limited to:

- i. surface structures (e.g., buildings, gates, fences, tanks, lagoons, settling ponds, bridges, substation);
- ii. subsurface structures (e.g., underground tanks, storm water systems, sanitary sewer systems, drains, leach fields, septic systems); and
- iii. ground water wells.

b. Provide all maps in your possession depicting each of these characteristics and its location on the property.

c. Describe how the characteristics referred to in the preceding question changed over time (e.g., when they were built, installed, altered, damaged, demolished) and the dates of each change.

d. Provide copies of all documents concerning sampling, testing or other technical or analytical information concerning the surface water, groundwater, soils, sediments, and/or air at and adjacent to the Site conducted by private entities or by local, regional, state, or federal agencies.

e. If the Respondent or its contractor is currently undertaking or planning to undertake investigations or excavations of the soil, groundwater, surface water, sediments, air, geology, or hydrogeology on or about the Site, describe the nature and scope of these investigations and the estimated completion date.

d. Describe all leaks, spills, or releases at or from the property of materials that were or may have been hazardous, toxic, flammable, reactive, or corrosive, or may have contained hazardous substances, including, but not limited to:

- i. the date of each such occurrence;
- ii. the specific location of each such occurrence; and
- iii. the materials that were involved in each such occurrence in terms of the nature, composition, color, smell, and physical state (solid or liquid) of such material.

e. Describe and provide the dates of all activities undertaken by Respondent and others to:

- i. address all leaks, spills, or releases of materials at or from the property; and
- ii. to prevent a threatened leak, spill, or release at or from the property.

f. Describe all fires, explosions, or similar occurrences at the Site, including but not limited to:

- i. the dates of such occurrences;
- iii. the specific locations on the Site of such occurrences;
- iv. the nature of such occurrences; and
- v. the measures taken to respond to them.

g. Provide all documents related to government inspections of the Site during the period being investigated, including but not limited to inspection reports and communications between the Site operator or owner and the government entity concerning the operation of the Site.

8. Information About Others

a. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

9. Compliance With This Request

a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:

- i. the names of all individuals consulted;
- ii. the current job title, job description, address and telephone number of each individual consulted;

- iii. the job title and job description during the period being investigated of each individual consulted;
- iv. the nature of all documents reviewed;
- v. the locations where those documents reviewed were kept prior to review; and
- vi. the location where those documents reviewed are currently kept.

b. Identify Respondent's policy with respect to document retention.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

**DECLARATION**

I declare under penalty of perjury that I am authorized to respond on behalf of

\_\_\_\_\_ and that the foregoing is complete, true, and correct.  
Respondent

Executed on \_\_\_\_\_, 20\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Type Name

\_\_\_\_\_  
Title [if any]

**INFORMATION REQUEST INSTRUCTIONS**

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
6. Submit Documents with Labels Keyed to Question. For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within twenty-one (21) days of discovering such responsive information may subject you to \$37,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the Respondents may be subject to criminal prosecution.

8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.
9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, or if you do not assert such claim on the information, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.
10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request will be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.
11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)
12. Objections to Questions. While the Respondent may indicate that they object to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondents to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

EPA CONTRACTOR LIST

Updated April, 2010

CONTRACTOR

CONTRACT NUMBER

ASRC Management Services, Inc.  
Subcontractor: Booz Allen Hamilton  
Effective: April 19, 2008

Contract # EP-S1-06-02

Industrial Economics, Inc.  
Effective: March 22, 2002

DOJ Contract # 02-C-0437  
(Subcontract 022-02-S-0110)

Eisenstein Malanchuk LLP  
Effective: September 1, 2007

Contract # EP-W-07-079

Sovereign Consulting, Inc.  
Subcontractor: TechLaw, Inc.  
Effective: July 1, 2006

START 8(a) Contract # EP-W-06-043

Mabbett & Associates, Inc.  
Effective: September, 2009

REPA4 Contract # EP-W-07-051

## INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Information Request and related Enclosures:

1. The term "you" or "Respondent" shall mean the addressee of this Request, Honeywell International, Incorporated, its officers, managers, employees, contractors, trustees, successors, assigns, and agents, and any predecessor or successor corporations or companies, including Threadwell Tap and Die Company, Bendix Corporation, Bendix Industrial Tools Division, B.C. Acquisition Corporation, Besly Products Corporation, and Allied Signal Incorporated.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:
  - (a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
    1. invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
    2. letter, correspondence, fax, telegram, telex, Email;
    3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
    4. agreement, contract, and the like;
    5. log book, diary, calendar, desk pad, journal;
    6. bulletin, circular, form, pamphlet, statement;
    7. report, notice, analysis, notebook;
    8. graph or chart; or
    9. copy of any document.
  - (b) microfilm or other film record, photograph, or sound recording on any type of device;
  - (c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:
    1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and

2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and
  - (d) attachments to or enclosures with any document as well as any document referred to in any other document.
3. The term "identify" or "provide the identity of" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with job title, position or business; and (d) the person's social security number.
  4. The term "identify" or "provide the identity of" means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address and telephone number; (c) legal form (*e.g.*, corporation, partnership); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.
  5. The term "identify" or "provide the identity of" means, with respect to a document, to provide: (a) its customary business description (*e.g.*, letter, invoice); (b) its date; (c) its number, if any (*e.g.*, invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter.  
Alternatively, Respondent may provide a copy of the document.
  6. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
  7. The terms "the period being investigated" and "the relevant time period" shall mean the period being investigated as specified on the first page of the Information Request Questions.
  8. The terms "the Site" or "the facility" shall mean and include the 180 Laurel St., Greenfield, MA currently identified by EPA as the Former Bendix Property Superfund Site.
  9. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
  10. The term "asset" shall mean and include but not be limited to the following: cash, commodities, personal property, collectibles, real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations, and unincorporated companies, whether foreign or domestic, securities, patents, stocks, bonds, and other tangible as well as intangible property.

11. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

**SUMMARY OF GENERIC SCOPE OF WORK**

**This summary of the Generic Scope of Work is provided for informational purposes only. More detailed provisions will be set forth in the site-specific Scope of Work. Provisions may vary from site to site.**

When EPA determines that a Potentially Responsible Party (PRP) has the ability to promptly and properly prevent, mitigate, or eliminate the threats posed by hazardous substances at the Site, EPA may issue an Administrative Order (Order) to such party (the Respondent) with an attached Scope of Work (SOW). The Order and SOW, among other things, compel the Respondent to develop a plan to clean up the Site. The components of the plan (also called a "deliverable") must be submitted to EPA for approval before implementation. Detailed instructions for generating each component shall be provided in the SOW. The plan shall consist of the components listed below.

- 1) **Site Security** - The Respondent shall provide on-site security service. Site security shall be maintained until EPA determines the threats posed by conditions at the Site are eliminated or substantially mitigated.
- 2) **Notification of Contractor Selection** - The Respondent shall notify EPA of the proposed cleanup contractor selected to perform work required under the Order.
- 3) **Site-Specific Health and Safety Plan (HASP)** - The Respondent shall develop and implement a HASP for all activities to be conducted at the Site. The HASP shall be developed to protect all on-site personnel and must comply with all applicable health and safety regulations.
- 4) **Quality Assurance Plan (QAP)** - The Respondent shall develop a QAP to be utilized in conducting all field and laboratory analysis. The QAP shall ensure that analytical results generated are of known quality.
- 5) **Site Assessment Plan (SAP)** - The Respondent shall develop a SAP specifying the overall strategy of the field investigative work necessary to characterize site contamination.
- 6) **Site Assessment** - A Site Assessment shall be conducted following EPA approval of the SAP.
- 7) **Site Assessment Report and Cleanup Plan (SAR/CP)** - Following completion of the Site Assessment, the Respondent shall develop a SAR/CP that summarizes the Site Assessment and proposes cleanup methods necessary to substantially mitigate and/or eliminate the threats posed by hazardous substances present at the Site.
- 8) **Site Cleanup** - The Site Cleanup shall be conducted according to the EPA approved Cleanup Plan.
- 9) **Completion of Work Report (CWR)** - Upon completion of the Site Cleanup, the Respondent shall submit a CWR summarizing the work performed under the Order and SOW and outlining any remaining contamination.

At any time prior to or after the completion of the work specified in this SOW, EPA may determine that

additional tasks are necessary in order to achieve the objectives of the Order, the SOW and CERCLA.

Information Request Waste Survey Chart

Name of Respondent: \_\_\_\_\_ Respondent's Location: \_\_\_\_\_ Date: \_\_\_\_\_

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Acids				
Adhesives				
Asbestos (incl. Insulation and transit piping)				
Adsorbents (from spills, leaks, etc.)				
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				
Lubricants				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disclosed in trenches @ "x" location..
Oils				
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Dyes				
Etching Solutions				
Filters				
Flammable, Reactive, or Explosive Materials				
Fungicides				
Herbicides				
Insecticides				
Insulating/Fire Proofing Materials				
Laboratory Wastes				
Lubricants				
Metals:				
grindings				
powders				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
shavings				
sludges				
solutions				
other: (e.g. tanks)				
Paint and Coating Wastes:				
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				
Photography Wastes:				
developers				
fixers				
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes				
Sludges				
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				
Solvents				
Waste Oils				
Wood Preservatives				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster (55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @ "x" location..
Other:				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1) Trade Name/Chemical Composition, 2) Name of Generator/Transporter (e.g. Nitric acid/HNO <sub>3</sub> , Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disclosed in trenches @ "x" location..

**SITE DESCRIPTION**

The Former Bendix Property Superfund Site ("Site") is located at 180 Laurel Street, Greenfield, Franklin County, Massachusetts. The Site is located in a mixed residential/commercial area and is zoned "GI-General Industrial." The property is abutted by residential properties and a public storage building to the north, interstate 91 to the west, a cemetery and residences to the south, and woodlands followed by residential properties to the east. According to the 2000 census, 2,420 people live within a one-mile radius of the Site. Within one mile are also a public school and two nursing homes.

The Site currently consists of a single parcel of land totaling 17.3 acres and is accessed via a paved driveway at the end of Laurel Street. The Site is described as Map R41, Lot 2 in the Town of Greenfield Tax Assessor's Office. The Site is partially fenced, inactive, and has been abandoned for approximately 10 years. The land is developed with two buildings. The first is an approximate 94,000 square-foot (sq ft) single-story, slab on grade concrete block industrial building that is located along the south-central region of the Site. The second building is an approximate 700 sq ft concrete block garage-style building, located at the northeast portion of the Site. This is currently being used as an active groundwater treatment plant.

The Site has been used for industrial purposes since the early 1960s. The primary manufacturing activity was metalworking, including the milling and grinding of steel drill bits and taps.

**END OF INFORMATION REQUEST**

**THANK YOU FOR YOUR COOPERATION**