

WORKSPACE

- ① motor oil observed in the pit
- ② starter is 100% xylene - a hazardous waste.

furniture
möbel
meubles
meubelen
mobili
mobiliario
möbler

Feb. 20, 1989

Diane Conrad
Agency of Natural Resources
103 S. Main St.
Waterbury, Vt. 05676

Dear Ms. Conrad;

I received the attached soil test results last week, and spoke to Rod Lamothe from Scitest as to the meaning of the numbers.

Apparently the only compound that was present is xylene, and that in a very small amount. He suggested that it very possibly came from motor oil. This I doubted because I knew that we did not throw motor oil into the pit. I realize that there were oil filters found but that in itself is not proof that oil was also disposed of there, and in fact it was not. I determined the most likely source to be the starter used to ignite the fire. In most cases this was a small amount of xylol which we normally use to periodically clean our spray guns. I have enclosed the MSDS for xylol.

You are well aware of my feelings on this matter and I won't dwell on that in this letter. However I want to impress upon you the importance of cooperation between not only your office but every office of the agency and the small manufacturers in the state. The problems that we all face concerning the environmental future of our planet are very complex. The law makers are correct in passing legislation to make us aware of the problems, but they also must help to provide some of the answers. The entire burden cannot be placed on the generators.

I bring this up because I am certain that after this problem has been cleared up that other problems concerning waste will appear. The most likely being the landfill problem. If in fact we can't burn our by-products and we can't dump them, where do we go? I posed this question to Philip Etter at the Air Pollution division. He admitted that in many cases the answers were not available.

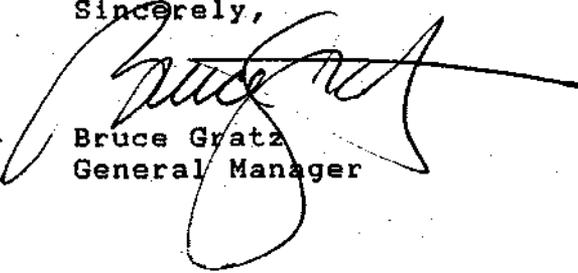
We need support, not accusations that put us into the position of having to prove ourselves innocent of unsubstantiated guilt. We need help finding the answers, not accusations of being the problem.

We are honest people, trying to make an honest product that keeps ourselves and the families of fifty other people in jobs that benefit this community. This is the primary goal of Workspace, and wouldn't it be wonderful if we could rely on agencies like yours to help us to continue the process, not hinder.

What is the next step? We would like to be removed from the list, not simply listed as a "closed" waste site. Whatever happened to warnings? Whatever happened to innocent until proven guilty?

Thank you for hearing me out. I look forward to your response.

Sincerely,



Bruce Gratz
General Manager

MATERIAL SAFETY DATA SHEET

FOR COATINGS, RESINS AND RELATED MATERIALS

HEALTH 2
 FLAMMABILITY 3
 REACTIVITY 0

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

DATE OF PREP. 3/25/88
 INFORMATION ON THIS FORM IS PROPRIETARY INFORMATION AND FURNISHED SOLELY FOR YOUR CUSTOMER.

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PREPARED BY: ALAN E. KISIEL

CUSTOMER: WORKSPACE INCORPORATED
 BOX 142
 ROUTE 110
 CHELSEA VT 05038

Section I

MANUFACTURER'S NAME: LILLY INDUSTRIAL COATINGS, INC.
 STREET ADDRESS: ATHOL ROAD, P.O. BOX 188 CITY, STATE, AND ZIP CODE: TEMPLETON, MA 01468
 EMERGENCY TELEPHONE NO.: 617-939-2166
 PRODUCT CLASS: MANUFACTURER'S CODE IDENTIFICATION: 16
 TRADE NAME: XYLOL

Section II - HAZARDOUS INGREDIENTS

INGREDIENT	PERCENT BY WEIGHT	THRESHOLD LIMIT VALUE PPM	THRESHOLD LIMIT VALUE mg/M ³	PERMISSIBLE EXPOSURE LIMIT*	LOWER EXPLOSIVE LIMIT	VAPOR PRESSURE mm @ 20° C
XYLENE	1330-20-7 100.0%	100	435.00	435.00	1.0	6.00

* REPORTED IN MG/M3

Section III - PHYSICAL DATA

BOILING RANGE 280.0 - 285.0 F
 VAPOR DENSITY HEAVIER LIGHTER, THAN AIR
 EVAPORATION RATE FASTER SLOWER, THAN ETHER
 PERCENT VOLATILE BY VOLUME 100 % WEIGHT PER GALLON 7.20

Section IV - FIRE AND EXPLOSION HAZARD DATA

DOT CATEGORY FLAMMABLE
 FLASH POINT 78- 82 F TCC



Box 339
Randolph, Vermont 05060-0339
(802) 728-3379

LABORATORY REPORT

CLIENT NAME:	Workspace, Inc.	LABORATORY NO.:	87-89
ADDRESS:	Route 100 Box 273 Chelsea, VT 05038	PROJECT NO.:	70114
		DATE OF RECEIPT:	01/25/89
		DATE OF REPORT:	02/08/89
ATTENTION:	Bruce Gratz	DATE OF SAMPLE:	01/25/89

RESULTS

(Expressed as milligrams per kilogram mg/kg except as noted)

<u>PARAMETER</u>	<u>REPLICATE 1</u>	<u>REPLICATE 2</u>	<u>REPLICATE 3</u>	<u>AVERAGE</u>	<u>%RECOVERY</u>
Cadmium	2.01	2.10	---	2.05	102
Chromium	42.7	44.4	---	43.6	121
Copper	19.4	19.8	---	19.6	105
Lead	30.4	33.6	---	32.0	109
Nickel	67.3	60.0	---	63.7	87
Silver	2.59	3.59	3.55	3.24	---
Barium	97.1	101.9	100.6	99.9	---
Arsenic	25.0	23.4	---	24.2	---
Selenium	2.9	3.3	---	3.1	---

Respectfully submitted,

SCITEST, INC.

Roderick J. Lamothe
Roderick J. Lamothe
Laboratory Director

LABORATORY REPORT

CLIENT NAME: Workspace, Inc.
SAMPLE LOCATION: Chelsea, Vermont
LABORATORY NUMBER: 87089
PROJECT NUMBER: 70114

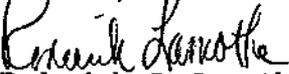
DATE OF SAMPLE: 01/25/89
DATE OF RECEIPT: 01/25/89
DATE ANALYZED: 02/08/89

PARAMETER

Chloromethane	<100
Bromoform	<500
Bromomethane	<100
Dibromochloromethane	<100
Vinyl Chloride	<100
2-Chloroethylvinyl Ether	<500
Chloroethane	<100
Methylene Chloride	<100
Trichloroethylene	<100
Trichlorofluoromethane	<100
1,1-Dichloroethene	<100
1,1-Dichloroethane	<100
cis or trans-1,2-Dichloroethylene	<100
Chloroform	<100
1,2-Dichloroethane	<100
1,1,1-Trichloroethane	<100
Carbon Tetrachloride	<100
Bromodichloromethane	<100
1,2-Dichloropropane	<100
trans-1,3-Dichloropropene	<100
cis-1,3-Dichloropropene	<100
1,1,2,2-Tetrachloroethane	<100
1,1,2-Trichloroethane	<100
Tetrachloroethylene	<100
Benzene	<100
Toluene	<100
Ethylbenzene	<100
Chlorobenzene	<100
1,4-Dichlorobenzene	<100
1,3-Dichlorobenzene	<100
1,2-Dichlorobenzene	<100
Xylenes	196

EPA Method 5030 & 8010/8020; all results reported as ug/l (ppb) dry weight of soil.

Respectfully submitted,
SCITEST, INC.


Roderick J. Lamothe
Laboratory Director

RJL/jf

