

PPG Industries, Inc. One PPG Place Pittsburgh, Pennsylvania 15272

Joseph M. Karas Assistant Counsel Law Department Direct Disl: (412) 434-2415 Telecopy: (412) 434-4292

VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

September 18, 1996

Mr. Lance R. Richman, P.G.)
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Diamond Alkali Superfund Site Passaic River Study Area

Dear Mr. Richman:

This is in response to USEPA's request for information regarding the above-referenced site. PPG previously submitted a partial response to this request, a copy of which is attached hereto.

As a preliminary matter, PPG objects to the Agency's request for information to the extent that it seeks information or action which exceeds EPA's statutory authority. PPG also objects to the request to the extent it seeks information which is not relevant to the release of hazardous substances at the above-referenced site, or is a privileged communication.

Notwithstanding these objections, PPG has conducted a diligent search for information response to the questions contained in the request. Based upon that search, PPG's responses are attached hereto. These responses address conditions at the former PPG facility in Newark, New Jersey during the period that PPG operated at that location.

Please contact me if you have any questions.

Joseph M. Karas Assistant Counsel

Attachment/

cc: Amelia Wagner, Esq.

T. J. Ebbert

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REQUEST FOR INFORMATION

Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located at 29 Riverside Avenue in Newark, New Jersey from 1920 through 1971 may have been discharged into the Passaic River.

Provide the information requested below, including copies of all available documentation that supports your answers.

1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?

PPG operated a paint manufacturing facility at 29 Riverside Avenue in Newark, NJ from approximately 1902 to 1971. PPG no longer operates at this facility.

2) Did your company receive, utilize, manufacture, discharge, release or dispose of any materials containing the following substances:

	YES	NO
2,3,7,8-tetrachlorodibenzo-p-dioxin		
or other dioxin compounds		
2,4-dichlorophenoxyacetic acid		
2,4,5-trichlorophenoxyacetic acid		
Napthalene		
Alkyd resins	·	· ——
Phenolic resins		
Carbon disulfide	*	
Chloroform	*******	
Cyanogen		
Methyl Ethyl Ketone		
Tetrachloroethane		
Toluene		
Xylene		
Ethyl benzene		
Trans-1,2-dichloroethene		
Arsenic		
Cadmium		
Chromium		
Copper		
Lead		
Mercury		
Nickel		

	YES	NO
Silver		
Titanium		
Zinc		
Cyanide		
PCBs		
Basic Lead Carbonate (White Lead)		
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PPG manufactured paint, varnish, linseed oil, and resins at its Newark facility. Basic raw materials included natural gums and resins, flax seed, non-chlorinated solvents and pigments, though the chemical constituents of some of these materials changed over time. Relative to the chemicals listed above:

- Alkyd resins were manufactured at the site. These products were used by PPG as raw materials
 in paint and varnish manufacture. Phenolic resins were not manufactured but would have been
 received at the site and used as raw materials in the manufacture of paints and varnishes.
- Toluene, xylene, ethylbenzene, and methyl ethyl ketone would have been received at the site
 and used as raw materials in the manufacture of paints and varnishes.
- Pigments would have been brought to the site and used in the manufacture of paints. These were often metallic chemicals and would have included compounds of cadmium, chromium, lead, titanium and zinc. Basic lead carbonate (white lead) would have been one of the pigments used as a raw material. Mercury was used, probably as a preservative in certain paints.
- Small amounts of flake naphthalene reportedly were used in lacquer production and small amounts of copper oxide reportedly were used in paint production.
- PCBs, dioxins, 2,4-dichlorophenoxyacetic acid, and 2,4,5-trichlorophenoxyacetic acid would not have been received, utilized, manufactured, discharged, released, or disposed of at the Newark site.
- PPG believes that carbon disulfide, chloroform, tetrachloroethane, trans-1,2-dichloroethene, arsenic, cyanogen or cyanide were likewise not present at the site, particularly since these chemicals are not normally associated with the types of operations conducted by PPG at the site.
- PPG has no information relative to nickel or silver, except to note that these metals are not commonly found in pigments.

3) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (2), were a product or by-product. Include in your answer the identity and quantity of the raw materials combined in each process; the temperature, pH and pressure of each process; and any residues or by-products generated as a result of the process.

RESPONSE: PPG manufactured paint, varnish, linseed oil, and resins at its Newark Paint Plant. Raw materials, consisting of resins, solvents, and pigments were mixed to produce paints. Varnishes were made from resins, oils, and solvents. Linseed oil was manufactured at this facility using flax seed as the principal raw material. Small amounts of caustic soda were used in processing the oil. Solvents from cleaning manufacturing equipment and off-spec products were recycled by reuse in the production process or reclaimed to recover solvents. Wastes from solvent recovery typically consisted of still sludge which was drummed and sent offsite for disposal. Finished products were shipped in tankwagons, drums or smaller containers. PPG has information about the identity of compounds that were used in the processes as indicated in response to question 2; however, information about the quantities, temperatures, pH and pressures, residues and by-products is not available.

b) During what parts of the manufacturing processes identified in the response to item (3)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (2), generated?

An integral part of paint, varnish and resin manufacture involves the cleaning of equipment between batches. Either organic solvents or a caustic water solution was used as the cleaning agent. When the solvent was too dirty to continue to be used, it was recovered using a solvent still. Distillation residues consisting of solvent residues and pigments would have been waste and were drummed and sent offsite for disposal. There is no information as to the amount of hazardous substances generated.

- Describe the chemical composition of these hazardous substances
 Still sludge would have consisted or organic (nonchlorinated) solvents and pigments.
- ii) For each process, what amount of hazardous substances was generated per volume of finished product?
 - PPG has no information responsive to this question.
- iii) Were the hazardous substances combined with wastes from other processes? If so, wastes from what processes?
 - See response above.
- 4) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (2) and (3). Include information on the following:

a) How residues, by-products and off-spec products were disposed of.

Solvents used for equipment cleaning were often recycled as raw materials in making lower quality coatings as a cost effective substitute for virgin raw materials. Solvents were also recovered as described in the response to Question 3(b). Materials that could not be recycled were drummed and landfilled off-site. Off-spec products would have been recycled to make salable products or sent off-site for disposal. With respect to caustic wastes, see the response to number 6.

b) What processes were used to treat your waste? What was done with the waste after it was treated?

The plant had a solvent recovery system to reclaim dirty solvents. After solvents were reclaimed, they were reused. The residue was disposed of in drums off-site..

c) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.

This plant closed 25 years ago. Throughout the facility's nearly seventy year operating history, a number of persons had responsibility for making arrangements for the disposal of wastes. PPG has been unable to locate any of these persons. Joseph Comeskey was the paint plant superintendent for a number of years prior to the closure of the facility, and would have had this responsibility just prior to the plant's closure in 1971. Mr. Comeskey died in 1990.

d) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

Containerized wastes were transported off-site by a private contractor, the identity of which is not relevant to this Request for Information.

5) Describe <u>all</u> storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

During its 70 year operating history, PPG's Newark facility used steel tanks, drums, barrels, pails, cans, bottles and bags to store materials used in the manufacturing process.

a) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.

Some drums were stored outside. At least some of these drums were stored on unpaved areas during a portion of the period that the plant operated. It is unknown whether the drums stored in this manner were empty or what they may have contained. One former employee recalled that empty barrels were stored outside.

Several of the largest buildings on the site were used for storage of drums of raw materials and finished products. PPG does not have sufficient information to determine whether such materials were stored outside at any time during which the plant operated.

- b) When drums were stored outside, were empty drums segregated from full drums?
- See response to 5a.
- 6. For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to items (2) and (3):
 - i) Was the waste stream discharged into a sanitary sewer and if so, during what years?
 - See response below.
 - ii) Was the waste stream treated before being discharged to the sanitary sewer and if so, how? Please be specific.
 - See response below.
 - iii) If the waste waters were not discharged to the sanitary sewer, where were it disposed of and during what years?
 - See response below
 - iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.
 - See response below.

PPG has insufficient information to answer this question. The plant was connected to a public sewer system which we believe existed when the facility was constructed in 1902. (See attached "Plumber's Specifications" from 1902 facility construction specifications) However, it is not clear whether anything besides sanitary waste, was discharged to these sewers. No detailed maps or records of analyses are available to PPG.

Tanks used in the production of certain products, e.g., water based paint, were rinsed with a dilute caustic water solution for cleaning after use. The rinse from this cleaning possibly was discharged to the sanitary sewers. In addition, a caustic cleaning tank was used to clean portable paint tanks. Periodically (1-2 months), the cleaning tank would be drained and its contents possibly were discharged to the sanitary sewers.

Caustic water solutions were also used in the production of the linseed oil. Linseed oil was produced at the Newark plant from 1923 until 1947. No informationwas found regarding the final disposition of the spent caustic water solution.

PPG is not aware of any information that any sewered materials were treated before discharge. No records of any analyses performed on the waste streams were found.

b) For floor drains or other disposal drains at the facility:

PPG does not have information indicating that floor drains existed in any of the buildings.

- i) Did the drains connect to a sanitary sewer and if so, during what years?
 See response above.
- ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?
 - See response above.

iii) (i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?

PPG has no information that there are any catch basins or lagoons on the property. With regards to the storm sewers, refer to 8b.

- a) If catch basins or lagoons existed, were they lined or un-lined?
 Not applicable.
- b) What was stored in the lagoons?

Not applicable.

c) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released, and during which years?

Not applicable.

iv) Please provide maps and/or diagrams of any waste water collection, transport or disposal systems on the property.

A 1959 revision of a 1942 drawing (copy attached) shows an 8-inch sewer line running from Building 17 southwest to the edge of the property. It apparently ties in to a city sewer line at that point, although this is not definitively stated on the drawing.

7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (2) or identified in the responses to item (3), above, provide the total amount generated during the operation of the facility on an annual basis.

PPG has no basis available on which to estimate quantities of hazardous substances generated by this facility. Based upon available information, PPG believes only a limited amount of production related waste, if any, was discharged to the sewers.

b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (2) or identified in the responses to item (3), above disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.

PPG has no information that hazardous substances were disposed of in the Passaic River or directly discharged to the Passaic River.

8) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to items (2) or (3), were released on the property, into the waste water or storm drainage system at the facility or to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

There was a fire at the Resin Plant (Building #17) in 1969. PPG has no information that any hazardous substances were discharged into the storm drainage system or to the Passaic River.

a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.

PPG has no information about any sampling of soil, water, air or other media following this incident.

b) EPA has information that there were two "36" pipes at your facility that discharged directly into the Passaic River. Please describe in detail how these outfalls were utilized, including, but not limited to, whether storm water, process waste water, or any other material was ever discharged through these outfalls. Provide any maps or diagrams showing the location of these outfalls.

PPG requests that EPA provide this information to PPG in response to our FOIA Request of July 22, 1996. These outfalls may be regional storm sewers that originate off of the former PPG site and pass through a right of way. PPG has no information about tie-ins to the storm sewers on the PPG site

c) EPA has information that 4" to 6" pipes ran from each individual building on your facility directly to the Passaic River. Please describe in detail how these outfalls were utilized, including but not limited to, whether storm water, process waste water, or any other material was ever discharged through these outfalls. Provide any maps or diagrams showing the location of these outfalls.

PPG has no information which identifies or locates these pipes We request that EPA provide us with the information it has on this subject in response to PPG's FOIA request of July 22, 1996.

d) EPA has information that a 100,000 gallon concrete underground tank was located at your facility beneath building #7 adjacent to the Passaic River. Please provide all information concerning this tank, including but not limited to, what was stored in this tank, whether this tank was checked for leaks and when, if ever, this tank was removed. Provide any maps or diagrams showing the location of this tank.

In response to a FOIA request, PPG obtained from USEPA, Region 2, an October, 1992 report by the New Jersey Department of Environmental Protection and Energy that describes such a tank However, former employees contacted did not recall its existence, and the drawings available do not identify such a tank. It is possible that the referenced structure was converted into a tank by a site operator subsequent to PPG's ownership of the site.

e) Please provide information relating to an explosion and fire which occurred at your facility on or about May 26, 1969. Please describe this incident and provide any and all documents relating to the incident and clean-up, if any, or subsequent preventive measures taken.

According to a PPG employee, a vapor cloud was released from one of the resin reactors in Building 17. This vapor cloud migrated through the building until an ignition source was found. The resulting explosion blew out sections of the walls and roof and ignited resin which had leaked out of one of the vessels. The burning resin spread throughout the building. Several other storage tanks and processing tanks failed during the fire, releasing their contents into the building. A tank truck which was being filled also caught fire and burned. Newark City firefighters pumped water from the river into the building and nearby storage tanks to attempt to contain the fire.

The building was damaged beyond repair during the fire and was later demolished.

PPG has no information indicating that hazardous substances were released into the Passaic River during this event.

9) Describe the use of the dock located on the Passaic River at your facility, including but not limited to, the time period it was used, the identity and volume of material received, how the material was transported into your facility and whether any spills or accidents occurred during the handling of these materials at the dock.

The dock was used in the first half of the century to unload flax seed and coal for use in the factory and to ship final products. Based on discussions with former employees, the dock was not used after 1946.

- 10) a) Was your facility ever subject to flooding. If so, was the flooding due to:
 - i) overflow from sanitary or storm sewer back-up, and/or
 - ii) flood overflow from the Passaic River?

Flooding from the Passaic river occurred at least once at the Newark plant in the 1960's. This flooding apparently did not cause significant damage to the facility. Based on discussions with former employees, this flood was the only one remembered.

b) Please provide the date and duration of each flood event.

The date and duration of the flood in the 1960's is not known.

11) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.

PPG has no record of any such proceedings related to this plant.

12) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (2) or (3). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.) Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

PPG submitted a survey form covering this property to Congressman Eckhardt's subcommittee in 1979. A copy of the completed Eckhardt survey for this plant is attached. It has been redacted to eliminate the identity of the company that hauled waste off-site, since that information is not relevant to this Request for Information.

- 13) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?
 - b) If so, please provide all other documents pertaining to the results of these analyses.

PPG has no information about any sampling of soil, water, air or other media, other than information that was provided to PPG by USEPA as part of a FOIA request related to another Superfund site. That information is contained in a 1992 report prepared by NJDEPE relative to the Frey Industries facility, which apparently occupies part of the former PPG site

- 14) and 15) See PPG's partial response for this Site dated August 15, 1996, a copy of which is attached.
- 16) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

Joseph Karas: Assistant Counsel

PPG Industries Inc., One PPG Place,, Pittsburgh, PA 15272

412-434-241; No personal knowledge

Thomas Ebbert: Environmental Engineering Associate

PPG Industries, Inc., 4325 Rosanna Drive, Allison Park, PA 15101

412-492-5478; No personal knowledge

Greg Norman: Process Technician

PPG Industries, Inc., 151 Colfax Street, Springdale, PA 15144

412-274-3454; No personal knowledge

Bill Silvestri: PPG's Cleveland Manage

PPG's Cleveland Manager, Ohio facility; 216-671-0050

Questions 6,8 & 10;

Tom Price PPG's C&R Engineering Office, Allison Park, PA; 412-492-5477

Question 8;

Pat Racioppi Retired: Florida;

Question 5, 6, 8 & 10

Tom Risch Retired: Pittsburgh, PA; 412-487-6219

Questions 2,5,6,8 &10.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

SEP 1 5 2003

GENERAL NOTICE LETTER CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Raymond LeBoeuf, President PPG Industries, Inc. One PPG Place Pittsburgh, Pennsylvania 15272

RE:

Diamond Alkali Superfund Site Notice of Potential Liability for

Response Actions in the Lower Passaic River, New Jersey

Dear Mr. LeBoeuf:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release and/or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9601 et seq. Accordingly, EPA is seeking your cooperation in an innovative approach to environmental remediation and restoration activities for the Lower Passaic River.

EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the six-mile stretch of the river, known as the Passaic River Study Area, which is part of the Diamond Alkali Superfund Site ("Site") located in Newark, New Jersey. Based on the results of previous CERCLA remedial investigation activities and other environmental studies, including a reconnaissance study of the Passaic River conducted by the United States Army Corps of Engineers ("USACE"), EPA has further determined that contaminated sediments and other potential sources of hazardous substances exist along the entire 17-mile tidal reach of the Lower Passaic River. Thus, EPA has decided to expand the Study to include the areal extent of contamination to which hazardous substances from the six-mile stretch were transported; and those sources from which hazardous substances outside the six-mile stretch have come to be located within the expanded Study Area.

By this letter, EPA is notifying PPG Industries, Inc. ("PPG") of its potential liability relating to the Site pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a). Under CERCLA, potentially responsible parties ("PRPs") include current and past owners of a facility, as well as persons who arranged for the disposal or treatment of hazardous substances at the Site, or the transport of hazardous substances to the Site.

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In recognition of our complementary roles, EPA has formed a partnership with USACE and the New Jersey Department of Transportation-Office of Maritime Resources ("OMR") ["the governmental partnership"] to identify and to address water quality improvement, remediation, and restoration opportunities in the 17-mile Lower Passaic River. This governmental partnership is consistent with a national Memorandum of Understanding ("MOU") executed on July 2, 2002 between EPA and USACE. This MOU calls for the two agencies to cooperate, where appropriate, on environmental remediation and restoration of degraded urban rivers and related resources. In agreeing to implement the MOU, the EPA and USACE will use their existing statutory and regulatory authorities in a coordinated manner. These authorities for EPA include CERCLA, the Clean Water Act, and the Resource Conservation and Recovery Act. The USACE's authority stems from the Water Resources Development Act ("WRDA"). WRDA allows for the use of some federal funds to pay for a portion of the USACE's approved projects related to ecosystem restoration.

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For the first phase of the Lower Passaic River Project, the governmental partners are proceeding with an integrated five- to seven-year study to determine an appropriate remediation and restoration plan for the river. The study will involve investigation of environmental impacts and pollution sources, as well as evaluation of alternative actions, leading to recommendations of environmental remediation and restoration activities. This study is being conducted by EPA under the authority of CERCLA and by USACE and OMR, as local sponsor, under WRDA. EPA, USACE, and OMR are coordinating with the New Jersey Department of Environmental Protection and the Federal and State Natural Resource Trustee agencies. EPA, USACE, and OMR estimate that the study will cost approximately \$20 million, with the WRDA and CERCLA shares being about \$10 million each. EPA will be seeking its share of the costs of the study from PRPs.

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were being released from PPG's facility located at 29 Riverside Avenue in Newark, New Jersey, into the Lower Passaic River. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, PPG may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

Enclosed is a list of the other PRPs who have received Notice letters. This list represents EPA's findings on the identities of PRPs to date. We are continuing efforts to locate additional PRPs who have released hazardous substances, directly or indirectly, into the Passaic River. Inclusion on, or exclusion from, the list does not constitute a final determination by EPA concerning the liability of any party for the release or threat of release of hazardous substances at the Site. Be advised that notice of your potential liability at the Site is being forwarded to all parties on this list.

We request that you consider becoming a "cooperating party" for the Lower Passaic River

Project. As a cooperating party, you, along with many other such parties, will be expected to fund EPA's share of the study costs. Upon completion of the study, it is expected that CERCLA and WRDA processes will be used to identify the required remediation and restoration programs, as well as the assignment of remediation and restoration costs. At this time, the commitments of the cooperating parties will apply only to the study. For those who choose not to cooperate, EPA may apply the CERCLA enforcement process, pursuant to Sections 106 (a) and 107(a) of CERCLA, 42 U.S.C. §9606(a) and §9607(a) and other laws.

Pursuant to CERCLA Section 113(k), EPA must establish an administrative record that contains documents that form the basis of EPA's decision on the selection of a response action for a site. The administrative record files, which contain the documents related to the response action selected for this Site are located at EPA's Region 2 office (290 Broadway, New York) on the 18th floor. You may call the Records Center at (212) 637-4308 to make an appointment to view the administrative record for the Lower Passaic River Project.

EPA will be holding a meeting with all PRPs on October 29, 2003 at 10:00 AM in Conference Room 27A at the Region 2 office. At that meeting, EPA will provide information about the actions taken to date in the Lower Passaic River, as well as plans for future activities. After the presentation, PRPs will be given the opportunity to caucus, and EPA will return to answer any questions that might be generated during the private session. Please be advised that due to increased security measures, all visitors need to be registered with the security desk in the lobby in order to gain entry to the office. In order to ensure a smooth arrival, you will need to provide EPA with a list of attendees no later than October 15, 2003.

EPA recommends that the cooperating parties select a steering committee to represent the group's interest as soon as possible, since EPA expects a funding commitment for the financing of the CERCLA share of the \$20 million study by mid-November 2003. If you wish to discuss this further, please contact Ms. Alice Yeh, Remedial Project Manager, at (212) 637-4427 or Ms. Kedari Reddy, Assistant Regional Counsel, at (212) 637-3106. Please note that all communications from attorneys should be directed to Ms. Reddy.

Sincerely yours,

George Pavlou, Director

Emergency and Remedial Response Division

Enclosure

cc: Joseph Karas, Esq.

PPG Industries, Inc.

PRPs in Receipt of Notice Letters:

PRP	Legal Counsel
J. Roger Hirl President and Chairman of the Board Occidental Chemical Co. Occidental Tower 5005 LBJ Freeway Dallas, Texas 75244	Paul W. Herring, Esq. Andrews & Kurth L.L.P. 1717 Main Street, Suite 3700 Dallas, Texas 75201
Joseph Gabriel Vice President of Operations 360 North Pastoria Environmental Corp. 1100 Ridgeway Avenue Rochester, New York 14652-6280	Philip Sellinger, Esq. Sills Cummis Zuckerman One Riverfront Plaza Newark, NJ 07102
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Mark Epstein, President Alden Leeds Inc. 55 Jacobus Ave. Kearny, New Jersey 07032	Eric Aronson, Esq. Whitman Breed Abbott & Morgan One Gateway Center Newark, NJ 07102
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Martin Benante, Chairman Curtiss-Wright Corp. 4 Becker Farm Road Roseland, New Jersey 07068	James Maher, Esq. Curtiss-Wright Corp. 4 Becker Farm Road Roseland, NJ 07068
Antonio Perez, President Eastman Kodak Company 343 State Street Rochester, New York 14650	Elliot Stern, Esq. Eastman Kodak Company 343 State Street Rochester, NY 14650
Edgar Woolard, Chairman E.I. du Pont de Nemours & Co. 1007 Market Street Wilmington, Delaware 19898	Bernard J. Reilly, Esq. Corporate Counsel E.I. du Pont de Nemours & Co. 1007 Market Street Wilmington, DE 19898

David Weisman, CEO Elan Chemical Company 268 Doremus Ave. Newark, New Jersey 07105	Jeffrey Schwartz, Esq. Sarber Schlesinger Satz & Goldstein One Gateway Center Newark, NJ 07102
Al Reisch, President E M Sergeant Pulp & Chemical Co. Inc. 6 Chelsea Road Clifton, New Jersey 07102	None
Mark Tucker, Esq. Essex Chemical Corp. 2030 WMDC Midland, Michigan 48674	Kenneth Mack, Esq. Fox, Rothschild, O'Brien & Frankel Princeton Pike Corp.Center 997 Lenox Drive, Building 3 Lawrenceville, NJ 08648
Todd Walker, President Fairmount Chemical Co. Inc. 117 Blanchard St. Newark, New Jersey 07105	John Ix, Esq. Porzio Bromberg & Newman 163 Madison Ave. Morristown, NJ 07962
Bradley Buechler, President Franklin-Burlington Plastics Inc. 113 Passaic Ave. Kearny, New Jersey 07032	Robert M. Becker, Esq. Kraemer, Burns, Mytelka & Lovell, P.A. 675 Morris Ave. Springfield, NJ 07081
Henry Benz, President Hoescht Celanese Chemicals, Inc. Route 202-206 P.O.Box 2500 Somerville, New Jersey 08876	Anne Conley-Pitchell, Esq. Hoescht Celanese Corp. Route 202-206 P.O.Box 2500 Somerville, NJ 08876
Francine Rothschild, President Kearny Smelting & Refining 936 Harrison Ave #5 Kearny, New Jersey 07032	None
Henry Schact, CEO Lucent Technologies, Inc. 600 Mountain Avenue Murray Hill, New Jersey 07974	Ralph McMurry, Esq. Hill, Betts & Nash LLP 1 Riverfront Plaza, Suite 327 Newark, NJ 07102-5401
Richard Meelia, President Mallinckrodt, Inc. 675 McDonnell Blvd. Hazelwood, Missouri 63042	Patricia Duft, Esq. Mallinckrodt, Inc. 675 McDonnell Blvd. Hazelwood, MO 63042

Richard Mahoney, CEO Monsanto Company 800 N. Lindbergh Blvd. St. Louis, Missouri 63167	L. William Higley, Esq. Monsanto Company 800 N. Lindbergh Blvd. St. Louis, MO 63167
Joseph Galli, President Newell Rubbermaid, Inc. 29 E. Stephenson St. Freeport, Illinois 61032	Peter Schultz, Director Environmental Affairs Newell Co. 4000 Auburn St. Rockford, IL 61101
Jean-Pierre van Rooy, President Otis Elevator Company North American Operations 10 Farm Springs Road Farmington, Connecticut 06032	Sarah Hurley, Esq. Robinson & Cole LLP 695 East Main Street Stamford, CT 06904-2305
Richard Ablon, President Ogden Corporation Two Pennsylvania Plaza, 25 th Floor New York, New York 10121	J.L. Effinger, Esq. Ogden Corporation Two Pennsylvania Plaza, 25th Floor New York, NY 10121
Henry McKinnell, Chairman Pfizer Inc. 235 E. 42 nd St. New York, New York 10017	Michael McThomas, Esq. Pfizer Inc. 235 E. 42 nd St. New York, NY 10017
Raymond LeBoeuf, President PPG Industries, Inc. One PPG Place Pittsburgh, Pennsylvania 15272	Joseph Karas, Esq. PPG Industries, Inc. One PPG Place Pittsburgh, PA 15272
Lawrence Codey, President PSE&G Co. P.O. Box 570 Newark, New Jersey 07101-0570	Hugh Mahoney, Esq. PSE&G Co. P.O. Box 570 Newark, NJ 07101
Phillip D. Ashkettle, President Reichhold Chemicals, Inc. P.O. Box 13582 Research Triangle Park, North Carolina 27709	Adam S. Walters, Esq. Phillips, Lytle, Hitchcock, Blaine & Huber 3400 Marine Midland Center Buffalo, NY 14203
Robert McNeeley, President Reilly Industries, Inc. 1510 Market Square Center 151 North Delaware Street Indianapolis, Indiana 46204	Paul Rivers, Director Corporate Environmental Affairs Reilly Industries, Inc. 1500 S. Tibbs Avenue Indianapolis, IN 46242

Robert Finn, President RSR Corporation 2777 Stemmons Freeway, Suite 1800 Dallas, Texas 75207	Howard Myers, Esq. RSR Corporation 2777 Stemmons Freeway, Suite 1800 Dallas, TX 75207
Christopher Connor, CEO The Sherwin-Williams Company 101 Prospect Avenue, N.W. Cleveland, Ohio 44115-1075	Donald McConnell, Esq. The Sherwin-Williams Co. 101 Prospect Ave., N.W. Cleveland, OH 44115
George Barrett, President Teva Pharmaceuticals USA Inc. 1090 Horsham Road North Wales, Pennsylvania 19454	Kirsten E. Bauer, Esq. Teva North America 1090 Horsham Road North Wales, PA 19454
Robert Senior, President Three County Volkswagen 701 Riverside Ave. Lyndhurst, New Jersey 07071	Robert DiLascio, Esq. 30 Park Avenue, Suite 101 Lyndhurst, NJ 07071
Michael Jordan, President Westinghouse Electric Corp. 11 Stanwix Street Pittsburgh, Pennsylvania 15222	Roger Willis, Esq. Westinghouse Electric Corp. 11 Stanwix Street Pittsburgh, PA 15222
Isaac Weinberger, President Wiggins Plastics Inc. 547 Maitland Ave. Teaneck, New Jersey 07666	None

AFFIDAVIT OF WILLIE MOORE

STATE OF NEW JERSEY
COUNTY OF UNION

The witness, having been duly sworn, affirms as follows:

- 1. I, Willie Moore, am a former employee of the Pittsburgh Plate Glass (PPG) facility formerly located at 29 Riverside Avenue, Newark, NJ. I was employed at the PPG facility during the period 1946-1971. During this time I held several positions, including porter and storage tank attendant, as well as serving as vice president of the union.
- 2. PPG manufactured paints, facquers, enamels and varnishes at the facility, in addition to resins and pigments. Raw materials used in these products included various solvents which were referred to by PPG-designated numbers such as PX1027, PX1028, PX42, PX43, PX14, and number 260.
- 3. During my tenure at the facility I had personally witnessed other PPG employees dumping containers into the Passaic River. I am not knowledgeable regarding the contents of those containers.
- 4. Every building at the PPG facility had a 4" to 6" sewer pipe running directly to the siver. Although my knowledge is limited regarding the use of these sewer lines, each building that floor drains that were covered by grates.
- 5. I have witnessed PPG employees sweeping residue, including spills of products and saw materials, down these floor drains.

AHL000113

6. I have witnessed flooding of the Passaic River at the site on several instances when
sportions of the facility were underwater.
Willie Moore
STATE OF NEW JERSEY
COUNTY OF UNION
Before me,
Notary Public

AHL000114

New Jersey Department of Environmental Protection & Energy Division of Responsible Party Site Remediation Aureau of Emergency Response Region J

INVESTIGATION

Case Number: 93-10-05-0736

PAC: File:

Investigator: Bruce F Doyle

Time Arrived: 0730

Joe Hoyle

Time Departed: 1030

Location: Area of 29-75 Riverside Avenue

Address: Chemical Compounds Inc.

29-75 Riverside Ave.

Newark, NJ

Responsible Party: Chemical Compounds Inc.

Address: 29-75 Riverside Avenue

Newark, NJ

Contact: Alberto Celleri

Phone: (201)485-3211

Location Phone #: (201)485-3211

Health Dept. Rep: Not Present

Phone #:

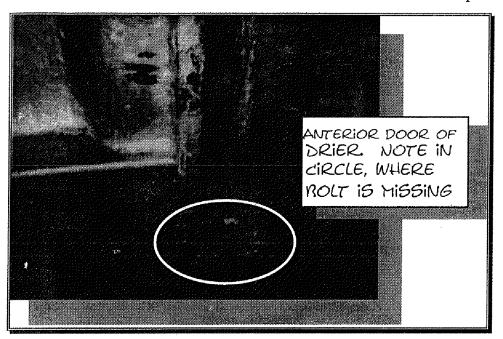
Origin of Complaint: Newark Fire Department Dispatch

Phone #: (201)733-7400

Nature of Complaint: Fire at facility that makes dye. Chemicals involved in fire are not known or identified as of the request for assistance to BER.

Findings: Emergency Response Specialists Bruce Doyle and Joe Hoyle responded to Newark to assist Newark Fire Department with operations at the incident site. After arriving on the scene of Chemical Compounds Inc. it was learned that the fire had been extinguished by the fire department, however, there was still no identification of the materials involved. Newark FD Chief Anthony Apostolico stated that the fire appeared to be confined to one area of the facility and directed the attentions of the responders to a specific piece of machinery. Closer examination of this apparatus revealed that it was a bladder press that would be used for the filtration of finished product to remove particulate matter of specific size. It was the estimation of the DEPE Responders that this apparatus, if not in operation, would not have sufficient material contained within to cause any sort of fire

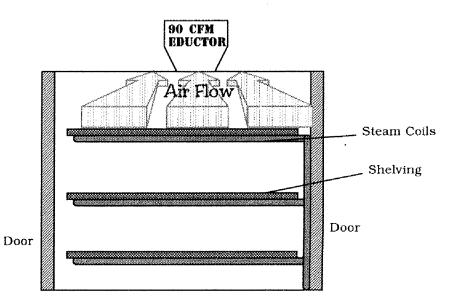
problem of the scope indicated by Chief Apostolico. Thus the area of investigation was broadened to the surrounding machinery. Next to the press, a large roughly cubic device was observed. This device was painted silver (recently) and appeared from it's design to be a drier or cooker. The device was in fact still radiating significant heat indicating it might still in operation. Closer inspection of the unit revealed that it had doors on both ends, and that the seat of the anterior door had been breached from within possibly due to excessive pressure buildup. The door was observed to be missing the dogs (batten down bolts) on the bottom of the door, on both sides. The posterior door, closest to the loading bay, exhibited evidence of internal pressure build up also, but not to the extent noted on the anterior door. At first the responders believed that the bolts on the



anterior door were no longer a part of the unit, however, they were found in the organic mass that had oozed from the drier. It was also noted that the position of the door was in line with the press such that at the point when the internal pressure exceeded the physical capability of the drier, it spewed the organic material onto the press and ignited in the ambient air. Further inspection of the inside of the building revealed that in addition to the press, other apparatus was sprayed with the organic mass, to a lesser

extent, in line with the seal of the anterior door. Also noted was the discoloration of portions of the building where the smoke (decomposing dye) billowed. Also noted during this inspection was the fact that apparatus within the building was still operating even though no one was at the facility overnight

After the arrival of Alberto Celleri, President of Chemical Compounds, it was learned that the apparatus involved in this incident was in fact a drier that is used by the RP to desiccate an organic dye that is a polymer of nitrated aniline (C₁₂H₁₉N₃O₅), this is the manufactured product. Alberto Celleri stated that the drier is hot water/steam fed from the boiler in the basement and that the normal operating temperature for this apparatus is 227°F which corresponds to a boiler pressure of



20 PSIG. For this particular batch, Celleri stated that he increased the operating pressure to 30 PSIG, which should have corresponded to a temperature increase, within the unit, to 250°F. The dryer's function is similar to that of a radiator; steam or hot water is pumped through coils beneath the shelves that hold the product to be dried. This radiated heat desiccates the dye and the moisture is drawn from the unit with an eductor fan (rated at 90 CFM). Weather or not this increase in pressure produced too high a temperature within the drier, or a failure of the coils permitted live steam to impinge on the dye; the dye was heated to a temperature in excess of 400oF. At this temperature, me dye produces ignitable vapors (flash point) and begins to decompose. This material decomposes to several organic and non organic molecules, including oxides of nitrogen. The MSDS also indicate that oxides of nitrogen are produced in the combustion of this dye. Given the chemical properties of nitrogen oxides, with particular focus on their Oxidizing capability, it is conceivable that the material built up in the drier and either overcame or ignited under the vacuum of the eductor fan. Given the afore mentioned scenario, it would have been possible for a detonation to have taken place within the drier that may have been responsible for the damage to the door. This possibility can be speculated because of the chemical nature of the reactants that make up this product. As the material decomposes, aniline(reactant) is liberated as are oxides of nitrogen. The oxidizing properties of these nitrogen oxides are well documented, and in particular, when heated under steam (Texas City, SS Grandcamp Explosion of 1947). Detonation can be initiated by excessive pressure of the nitrogen oxides alone. In the same space the reaction of the aniline would also contribute to the overall instability of the atmosphere as aniline is volatile in the presence of steam and is incompatible with oxidizers. If sufficient concentrations of nitrogen oxides were present within the drier a violent decomposition (detonation) might have occurred due to the contact of the aniline (a decomposition product of the dye). Although this scenario is possible, the specifics of the incident were not immediately evident from the evidence at the scene. It should be noted that the drier was not inspected by BER due to the extensive contamination of organic residue from the reaction (fire) on the inside. It should also be noted that the eductor was not functioning at the time of BER's investigation; no determination was made as to weather this was an effect of the reaction/decomposition or a contributing factor.

After conferring with Alberto Celleri and Chief Anthony Apostolico, Newark FD, it was determined that the cause of the incident required further investigation by the RP to determine the exact cause to thus prevent it from happening again. While the organic mass did not exit the facility, thereby falling under Departmental jurisdiction, the concern of the toxic combustion and decomposition by-products was addressed to Mr. Celleri as having the greatest potential for off site impact in the densely populated area of NE Newark, E. Newark (Hudson County) and North Arlington (Bergen County). Celleri was directed by Newark Fire Department with the concurrence of BER Personnel on scene, that the process could not be restarted until a full analysis of the incident could be made and further, that the drier could not be used until it's integrity could be certified.

Conclusions: BER 1 responded to the report of a chemical fire in the vicinity of 29 Riverside Avenue in Newark, Essex County. The fire was reported to the DEPE by Newark FD who also requested assistance. Initially, the fire was believed to have originated from the combustion of an unknown liquid in a bladder press on the main floor of the building owned by the RP. Subsequent BER investigation found that the fire originated in a dryer where the final product was undergoing thermal desiccation. Pressure within the dryer built up sufficiently to break off two of the five bolts holding the door in place and cause the dye within to spew out in plane with the door seal. The temperature of the material was high enough to initiate decomposition and release oxides of nitrogen. The off gassing of the decomposing dye was enough to support combustion and result in the low yield fire observed by Newark Fire Department. Subsequent analysis of the chemistry of the decomposition of this dye revealed that an explosive mixture could have formed in the drier and may have been responsible for

the damage to the apparatus. The fire was found soon enough in its course to preclude excessive damage of the facility however, the material did contaminated the main floor of the building. The material was found to be a Nitrated Aniline dye which would be expected to decompose to oxides of nitrogen and carbon. Newark FD extinguished the fire and upon the arrival of the owner of the facility, the remediation of the facility was undertaken.

Recommendations: Case Closed BER,

Joseph E. Hoyk

Supervisor

TIERRA-B-004375

New Jersey Department of Environmental Protection COMMUNICATIONS CENTER NOTIFICATION REPORT Received:10/05/93 Operator: ROGER Case # 93-10-5-1110-43 Notification Type: Other Reported By Affiliation B.DOYLE NJDEPE-DRPSR-BER Street Address Municipality State Incident Location: Facility Site CHEMICALS COMPOUNDS INC Phone 201-850-1436 Street Address Municipality County
29-75 RIVERSIDE AVE NEWARK ESSEX
Location Type Industrial Incident Date 10/05/93 State Substance Released UNKNOWN SOLID Amount Released ()UNKNOWN ID: State Solid CAS# Release Is Continuous Additional Substances HC BLUE 2 Substance Contained? N Hazardous Material? U TCPA? U A310 Letter? N COMU CODE: 0714 REF CODE: 001 Incident Description Fire, Spill Injuries? N Public Evac? N Facility Evac? N Public Exposure? Y Police On Scene? Y Firemen On Scene? Y DEP Requested? Y Wind Sp/Dir Contamination Of Air, Land Receiving Water Status At Scene FIRE AT ABOVE FACILITY, INVOLVING NITRATED ANILINE

Responsible Party Known Party CHEMICALS COMPOUNDS
Contact ALBERTO CELLERI
Street Address
Municipality
29-75 RIVERSIDE AVE
NEWARK
Phone 201-850-1436
Title PRES
County
ESSEX County OFFICIALS NOTIFIED NAME TITLE PHONE DATE TIME

NJSP :

MUNIC: NEWARK CITY 201-733-7400 10/05

Name Affiliation Method Date Time T/M B.DOYLE DRPSR ER1 Office, Faxed 10/05 1110 T 1. B.DOYLE 2.

COMMENTS

EEFER TO CASE #93-10-5-0736-38 TD 16901 FOR A310 & FURTHER INFORMATION.

MATERIAL SAFETY DATA SHEET

MANUFACTURER'S NAME: CHEMICAL COMPOUNDS, INC. 29-75 RIVERSIDE AVENUE NEWARK, NEW JERSEY 07104 EMERGENCY PHONE NO: (201) 850-1436/485-3212

REVISION DATE:

CAS# 33229-34-4

TRADE NAME: HC BLUE 2 CHEMICAL NAME: 2,2'-[4[-(2-Hydroxyethyl)amino)-2-nitro phenyl]imino]diethanol

CHEMICAL FAMILY: Nitrated Aniline FORMULA: C12H19N3O5

*** HAZARDOUS INGREDIENTS ***

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INGREDIENT: HC Blue 2

PERCENT

TLV

90%

none est. .

*** PHYSICAL DATA ***

APPEARANCE:

SPECIFIC GRAVITY:

BUILING POINT (DEG F):

SOLUBILITY IN WATER:
PERCENT VOLUME

PERCENT VOLATILE BY VOLUME:

EVAPORATION RATE:

Odorless deep purple powder

Not Applicable

Decomposes

Not Applicable

Slight

0.1 - 1.0

< 1

*** FIRE AND EXPLOSION HAZARD DATA ***

FLASH POINT (METHOD USED):

400 DEG F (COC)

FLAMMABLE LIMITS:

Not Applicable

EXTINGUISHING MEDIA:

Foam, Dry Chemical, Carbon

Dioxide, Fog, or Water Spray

SPECIAL FIRE FIGHTING PROCEDURES:

None

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Combustion liberates oxides

of nitrogen

*** HEALTH HAZARD DATA ***

ORAL LD 50, RAT: 4120 mg/kg

EFFECT OF OVEREXPOSURE: Not established

EMERGENCY AND FIRST AID PROCEDURES: Eyes: Flush immediately with plenty of cold water for 15 minutes. Get prompt medical attention. Skin: Wash



CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park

29-75 Riverside Avenue • Newark, New Jersey 07104

(201) 485-3211-2 • Fax: (201) 485-4870

Emergency and Remedial Response Division U.S. Environmental Protection Agency 290 Broadway, 19th Floor New York, New York 10007-1866

January 28, 1997

To Mr. Lance R. Richman, P.G.,

As per request, please find enclosed a re-submittal to the following responses to the "Request for Information" received on July 10, 1996 at Chemical Compounds Inc.. The reason for the re-submittal was to further verify specific responses which our company regards confidential information. If you should have any further questions or require additional information, please feel free to contact Jim Giannotti at (201) 485 - 3212.

Sincerely,

Jim Giannottti

jg./JG

c.c: AC/SG

ATTACHMENT A

REQUEST FOR INFORMATION

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Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located at 29-75 Riverside Avenue in Newark, New Jersey may have been discharged into the Passaic River.

Please provide the information requested below, including copies of all available documentation that supports your answers.

- 1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?
- 2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq.? If "yes", please provide the years that your company held such a permit and its EPA Identification Number.
- b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. § 1251, et seq.? If "yes", please provide the years that your company held such a permit.
- 3) Did your company receive, utilize, manufacture, discharge, release, store or dispose of any materials containing the following substances:

	Yes	No
2,3,7,8 tetrachlorodibenzo-p-dioxin		
or other dioxin compounds		
Acetic acid		
Adipic acid		
Ammonia		
Aniline		
Benzene		
Benzo(a)anthracene		
Benzoic acid		
Benzyl chloride		
Butyl benzyl phthalate		
Chlorobenzene	-	
Chloroethylene		
Chloroform		
1,2-dichloroethene		
Di-n-butyl phthalate		
Ethyl benzene		

	Yes	No
Fluoranthene		
Methanol		
Methylene Chloride		
2-methylnapthalene		
Naptha distillate		
Napthalene		
2-nitrophenol		
Petroleum ether		
Phenanthrene		
Pyrene Tetrachlorobenzene		
Tetrachloroethane		
Tetrachloroethylene		
Trichloroethane		
Trichloroethylene		
Toluene		
Xylene		
Aylene		
Arsenic	·	
Cadmium	`—	
Chromium	, 	
Copper		
Lead		
Mercury		
Nickel		
Silver		
Zinc		
Cyanide		
PCBs		

- 4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or by-product.
- b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?
 - i) Describe the chemical composition of these hazardous substances.
 - ii) For each process, what amount of hazardous substances was generated per volume of finished product?
 - iii) Were these hazardous substances combined with wastes from other processes? If so, wastes from what processes?

5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4). Include information on the following:

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- a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.
- b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.
- c) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.
- i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.
- ii) When drums were stored outside, were empty drums segregated from full drums?
- d) What processes do you use to treat your waste? What do you do with the waste after it is treated?
- 6) a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):
 - i) Was the waste stream discharged into a sanitary sewer and if so, during what years?
 - ii) Were they treated before being discharged to the sanitary sewer and if so, how? Please be specific.
 - iii) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?
 - iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.
- b) For floor drains or other disposal drains at the facility:

i) Did the drains connect to a sanitary sewer and if so, during what years?

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- ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?
- c) i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?
 - ii) If catch basins or lagoons existed, were they lined or un-lined?
 - iii) What was stored in the lagoons?

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- iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released, and during which years?
- d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.
- e) Also, EPA has information relating to several instances of discharge of process waste water into the sewer system in 1992 and 1995. Please provide a detailed description of these incidents.
- 7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.
- b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.
- 8) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4), were released on the property, into the waste water or storm drainage system at the facility or

to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

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- a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.
- b) Also, EPA has information that due to an industrial sewer line break in 1992, an unreported quantity of aniline was discharged to the Passaic River. Please provide all information relating to this and any other discharges and any measures taken to mitigate the impact of the discharges.
- 9) a) Was your facility ever subject to flooding. If so, was the flooding due to:
 - i) overflow from sanitary or storm sewer back-up, and/or
 - ii) flood overflow from the Passaic River?
- b) Please provide the date and duration of each flood event.
- 10) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.
- a) EPA has information that your facility has received several notices of violation for discharges of waste water into the sewer system, including a NJDEPE Field Notice of Violation issued on January 7, 1992 and a PVSC Notice of Violation issued on February 9, 1995. Please provide information on how these violations were resolved.
- 11) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?

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- b) If so, please provide all other documents pertaining to the results of these analyses.
- 13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.
- b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.
- c) To the extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.
- 14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.
 - a) State the legal name of your company.
 - b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.
 - c) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.
 - d) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.
 - e) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.
 - f) Identify any predecessor organization and the dates that such company became part of your company.

g) Identify any other companies which were acquired by your company or merged with your company.

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- h) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified in the responses to items (14)(e), (f), and (g), above.
- i) Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.
- 15) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

·
County of <u>Essex</u> :
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.
ANAMAM GAGETTE IIII III

Alberto Celleri NAME (print or type)

President TITLE (print or type)

SIGNATURE

State of New Jersey

Sworn to before me this day of 29 Jan., 1997

Notary Public

DEVIARD M. ACOSTA NOTARY PUBLIC OF NEW JERSEY My Commission Expires Aug. 18, 1993

CONFIDENTIAL

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # (4a) CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

CHEMICAL COMPOUNDS, INC. RESPONSE TO REQUEST FOR INFORMATION DATED JULY 9, 1996

The following are the responses of Chemical Compounds, Inc. to the Request for Information from the United States Environmental Protection Agency, dated July 9, 1996.

- 1. Chemical Compounds, Inc. (CCI) has operated at the facility in Building #17 at 29-75 Riverside Avenue since 1990. It acquired the facility in July, 1986 (See Deed Attachment 1) and installed equipment through 1990. During the 1986-1990 period it contracted with another entity for the manufacture of its products (See, Termination Notice to Southwest Photo Chem., Inc. Attachment 1).
- 2. (a) Yes, CCI has had a permit pursuant to the Resource Conservation and Recovery Act since 1990. Chemical Compounds Inc.'s EPA Identification # is NJD 108661737. (See Acknowledgement of Notification of Hazardous Waste Activity Attachment 2.)
- (b) Yes, CCI has a permit pursuant to the Federal Water Pollution Control Act, its amendments, the Clean Water Act and the Rules and Regulations of the Passaic Valley Sewerage Commissioners. The Permit Number is 20407122 and CCI has had the permit since July 20, 1992. (See copy of the Sewer Connection Permit with Passaic Valley Sewerage Commissioners-Attachment 3.)

3. Yes, the following is CCI's response to question No. 3.

Hazardous Material	Yes	No
2,3,7,8 Tetrachlorodibenzo-p-dioxin or		x
other Dioxin Compounds		
Acetic Acid	X	
Adipic Acid	X	
Aniline	Х	
Benzene	X	
Benzo(a)anthracene		X
Benzoic Acid	X	
Benzy Chloride		X
Butyl Benzyl Phthalate		X
Chlorobenzene	X	
Chloroethylene		X
Chloroform	Х	
1,2-Dichloroethene		, X
Di-n-butyl phthalate		X
Ethyl Benzene	X	
Fluoranthene		X
Methanol	X	
Methylene Chloride	X	
2-Methylnapthalene		Х
Naptha distillate		X
Naphthalene	Х	
2-Nitrophenol	X	
Petroleum Ether		Х
Phenanthrene		X
Pyrene		X
Tetrachlorobenzene		X
Tetrachloroethane		X
Tetrachloroethylene	Х	
Trichloroethane		X
Trichloroethylene		X
Toluene	х	
Xylene	X	

Arsenic	,	X
Cadmium		X
Chromium		х
Copper		X
Lead	Х	
Mercury		X
Nickel		Х
Silver		X
Zinc	X	
Cyanide	X	-
PCBs		х

4(a). CONFIDENTIAL

- 4(b) Attachment 4 contains a list of process waste water streams and their respective hazardous waste components.
 - i) The hazardous components generated as by-products in the waste water stream due to the impurity of the raw materials are detected in ppb concentrations, and are noted in Attachment 4.
 - ii) The amount of hazardous substances generated per volume of each finished product is not available. The hazardous substances generated in the waste water stream of various products are contained in the range of 500 1500 gallons of 99.99 % water. Therefore, an estimated amount of hazardous substances generated per volume of water is < 0.01 %. (See Attachment 4.)

- iii) The hazardous substances located in the waste water stream are generated on batch scale operations. The by-products are present in the waste water stream after the separation of the product by filtration. After filtration, the waste water stream is treated for regulated effluent exceedances. After treatment, the waste water is stored in a 10,000 gallon tank. A number of process waste water streams will combine in the 10,000 gallon storage tank.
- 5 (a) The following table is a list of employees at CCI who were or are responsible for the management of hazardous substances:

Name	Title	Description of Responsibility
Alberto Celleri	Co-President	Overall Operations
Harold Sullivan	Co-President	Overall Operations
Arturo Celleri	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage
Jim Giannotti	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage

5 (b) The following table is a list of transporters who were responsible for off-site disposal, including non-hazardous waste water:

Transporter's Name	Address	TSD Name & Address
Franks Vacuum Truck Services, Inc. NYD982792814	4500 Royal Ave. Niagra Falls, NY 14303	Research Oil Co. 2655 Transport Rd. Cleveland, OH 4415 OHD004178612
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	Systech Environmental 11397 County Road 176 Paulding, OH 45879 OHD005048947
Laidlaw Environmental Services MDD980554653	3527 Whisky Bottom Road Laurel, MD 20424	Laidlaw Environmental Services 3527 Whisky Bottom Road Laurel, MD 20424
Maumee Express NJD986607380	P.O. Box 278 Somerville, NJ 08876	Rineco Chemical Ind. 1007 Vulcan Rd Haskell Benton, AR 72015 ARD981057870
Oldover Corporation VAD098443443	P.O. Box 68 Rt. 1, State Rd. 652 Arvonia, VA 23004	Oldover Corporation P.O. Box 68 Rt. 1, State Rd. 652 Arvonia, VA 23004
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	ECOFLO 2750 Patterson Street Greensboro: Maryland 27407 NCD980842132
Chemical Waste Management of NJ NJD089216790	100 Lister Avenue Newark. NJ 07105	Chemical Waste Management of NJ 100 Lister Avenue Newark, NJ 07105
Tri-State Motor Transit Co. MOD095038998	P.O. 113 Joplin, MO 64802	Rineco Chemical Ind. 1007 Vulcan Rd Haskell Benton, AR 72015 ARD981057870

5 (c) i)& ii) The following table is a list of storage practices for the hazardous substances included in items (3) & (4) since the beginning of operations:

·	Name of Hazardous Substance	Storage of the Hazardous Substance
	Acetic Acid	55 gallon Plastic Drum < 4 L Glass Bottle - Laboratory Scale 5,000 gallon Tanker Truck - Waste
	Adipic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
	Ammonia	150 lb. Cylinder
Raw Materials	Benzoic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
or	Chloroform	< 4 L. Glass Bottle - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste 5,000 gallon Tanker Truck - Waste 4.000 gallon S/S Storage Tank - Waste
Laboratory Supplies	Methanol	55 gallon Stainless Steel Drum 250 gallon Plastic Totes 4.000 gallon S/S Storage Tank - Waste 5.000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Methylene Chloride	55 gallon Stainless Steel Drum 4,000 gallon S/S Storage Tank - Waste 5,000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Toluenc	55 gallon Stainless Steel Drum 4.000 gallon S/S Storage Tank - Waste 5.000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Xylene	55 gallon S/S Drum 250 gallon Plastic Totes 4.000 gallon S/S Storage Tank - Waste 5.000 gallon Tanker Truck - Waste < 4 L. Glass Bottles - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
Waste Water Storage (ppb Concentrations) Based on Analytical	By-Products found in the waste water stream: Aniline, Benzene, Benzoic Acid, Chlorobenzene, Chloroform, Ethyl Benzene, Methanol, Methylene Chloride Naphthalene, 2-NitroPhenol, Tetrachloroethylene, Toluene,	55 gallon drum - Waste 400 - 4,000 gallon S/S Storage Tank 10,000 gallon S/S Storage Tank
Data	Xylene, Lead, Zinc, Cyanide	5,000 gallon Tanker Trucks - Waste

The 55 gallon drums or 250 gallon Plastic totes containing hazardous substances listed in items (3) & (4) are stored on wooden palates outside on either a paved area with asphalt or a concrete pad. (See Attachment 5 for a facility layout for the storage areas of hazardous substances.)

In December 1993, a concrete diked area was constructed outside the building located on the southeast part of the building with a capacity of 25,000 gallons. The diked area is within an 18 inch thick concrete berm approximately 4 feet high. Inside is the waste water storage area with (2) 4,000 gallon Above Ground S/S Storage tanks and (1) 10,000 gallon Above Ground S/S Storage Tank on top of an 8 inch concrete slab. In the past, the waste water and or flammable solvents such as methanol, xylene, & toluene were stored in a 5,000 gallon Tanker Truck in that same area. In addition, waste flammable liquids were stored in a 4,000 gallon Above Ground S/S Storage Tank in the diked area. Since September 1995, waste flammable liquids have been recycled. Currently, the 4,000 gallon S/S Storage Tank is being utilized for waste water storage.

Empty drums are segregated from full drums. The empty drums are located at the most southeastern part of the property, adjacent to or in an enclosed shed.

5 (d) The waste water streams are treated by neutralization, chemical precipitation, or carbon filtration. The process waste water streams are transferred to one of (2) 1,500 gallon mixing tanks for the introduction of treatment. One treatment involves neutralization by the addition of Sodium Hydroxide or Sulfuric Acid to meet discharge regulations. Another treatment involves carbon filtration for the removal of organics. The drain water is collected in an Above Ground S/S Storage Tank located in the basement and treated for heavy metals. The treatment for the drain water involves chemical precipitation with the addition of lime followed by filtration. After treatment, the waste water is transferred to a storage tank and analyzed.

If the treatments are effective, the waste water is transferred to a 10,000 gallon Above Ground S/S Storage tank. After the tank is full the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the PVSC sanitary sewer which flows approximately 70 yards to an interceptor of the industrial park. The solid waste generated from treatment is non-hazardous and disposed off-site to a regulated facility. Carbon filtration and chemical precipitation treatment methods have only been used since October, 1995. Prior to that time, the waste water was treated by neutralization.

- 6 (a) i) From July 1992 to the present, the process waste water stream was discharged into a sanitary sewer connected with Passaic Valley Sewerage Commissioners.
 Before July, 1992, the process waste water stream was connected to a 5,000 gallon tanker truck for off-site disposal.
 - ii) Yes, the waste water stream is treated before discharging into the sanitary sewer. The water is treated by neutralization, chemical precipitation, and carbon filtration. (See 5 (d) for details of the treatment methods.)
 - iii) Before CCI obtained a permit for discharge to the sewer, the waste water stream was collected in a 5,000 gallon tanker truck. When the tanker truck achieved maximum capacity, the water would be sent to a TSD facility for treatment. CCI obtained a permit for discharging process waste water to the sewer on July 20, 1992. (See Attachment 11, for manifests.)
 - iv) Attachment 4 contains analytical results of process waste water streams.
- 6 (b) i) & ii) From 1986 February, 1992, the main manufacturing floor at the facility was equipped with internal floor drains which were directly connected to the sanitary sewer. From February, 1992 through July, 1992, the drain water was collected into an above ground storage tank located on the basement floor and sent directly to a 5,000 gallon tanker truck. When the tanker truck became full, it was sent for off-site disposal. From July, 1992 April, 1993, the drain water was sent to the 5,000 gallon Tanker Truck, then was combined with process waste water and then transferred to an above ground storage tank in the basement. After sampling and analysis for effluent exceedances, the waste water was combined in the basement with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer. In April, 1993 CCI replaced the 5,000 gallon Tanker Truck with a 10,000 gallon above ground S/S Storage tank.

From 1995 to the present, the drain water has been transferred to an above ground S/S storage tank for the treatment of heavy metals by chemical precipitation. After treatment, the drain water is transferred to another above ground storage tank for analysis. If the treatment has been successful, the drain water is sent directly to the 10,000 gallon Storage Tank, and mixed with the process waste water. After the tank has accumulated to its maximum capacity, the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer which flows approximately 70 feet to an interceptor of the industrial park.

- 6 (c) i) There have been no storm sewers, catch basins, or lagoons located at Building # 17, 29-75 Riverside Ave., Newark, N.J. since the beginning of operations of CCI.
 - ii) N/A
 - iii) N/A
 - iv) N/A
- 6 (d) The facility layout for the collection, storage, and disposal of waste water can be located in Attachment 6.
- 6 (e) On January 7, 1992 the Newark Fire Department and the New Jersey DEP responded to a complaint of a discharge at the CCI facility. CCI's next door neighbor had plugged up the sewer line, and when CCI'S personnel excavated the line to attempt to clear it, the contents of the line, including water colored purple with Red = 3 and Blue # 2 dye was disbursed into the excavation. This water was pumped out of the excavation onto the ground where it was observed by the Fire Department and DEP. CCI was ordered to clean up the discharge, which was analyzed and shown to be non-hazardous. (See analysis of soil and liquid samples Attachment 8). CCI was charged with discharging to the PVSC sewer without a permit (See Attachment 7).

Subsequently, after CCI obtained a PVSC permit, it was cited by PVSC for having discharged waste water to the sewer which contained some volatile compounds and metals in excess of permitted concentrations. These discharges exceedances have been resolved, and current treatment methods appear to be keeping wastewater discharges within permitted parameters.

- 7 (a) The total amount of hazardous substances generated during the operation of the facility on an annual basis can not be determined. The hazardous substances which are contained in the waste water stream are determined by the purity of the raw materials. As a result, contaminant concentrations differ from one manufacturing batch to another.
- 7 (b) Chemical Compounds Inc. has not discharged any hazardous materials into the Passaic River.
- 8 (a) There have been no leaks, spills, explosive fires or other incidents that occurred at the CCI facility that resulted in hazardous substances being released.

- 8 (b) CCI did not discharge any hazardous material into the Passaic River. (See answer to 6(e) for description of incident.)
- 9 (a) Yes, CCI's facility is subject to flooding due to the close proximity of the Passaic River. Flooding does occur due to the overflowing of the Passaic River. As a result, the water generated due to the flooding of the Passaic River is analyzed, treated and stored at our facility before discharging to the sewer.
- 9 (b) Flooding occurs during very bad storms, the dates of each occurrence are not known.
- 10 (a) In 1992, due to the discharge described in 6(e), CCI paid administrative costs to the New Jersey Department of Environmental Protection for the discharge response. The NJDEPE Case # is 92-01-07-1025. In addition, CCI was charged with violating the Water Pollution Control Act for negligently discharging a pollutant into a municipal treatment works without possessing a valid industrial pretreatment permit issued by the Passaic Valley Sewerage Commission. CCI pled guilty to a fourth degree water pollution violation with a fine of \$5,000 for the offense and had to provide a check in the amount of \$1,760.85 payable to the Office of the State Environmental Prosecutor to be used to purchase a one page advertisement in the Gloucester Times conveying a positive environmental message.

CCI also paid for administrative costs when the Bureau of Emergency Response responded to a chemical fire at the facility on October 5, 1993. The case was closed. The NJDEPE Case #'s are 93-10-05-0736 & 93-10-05-1110.

On September 14, 1994, CCI had received a Notice of Violation from the Division of Facility Wide Enforcement - NJDEP. The inspection identified a violation of the Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder. Remedial actions to correct the violations were implemented by CCI within days and no further enforcement was required thereafter.

With regard to violations of discharge permit limitations, CCI resolved the matter by entering into a Consent Order and Final Judgement with the Passaic Valley Sewage Commissioner on November 24. 1994. by which it paid \$6,000 to PVSC and entered into a compliance schedule, which was subsequently extended to July 1, 1996. (See Consent Order and Final Judgement and other relevant documents - Attachment 9 & 10.)

11) For the purchasing of listed hazardous substances, such as raw materials, in item (3) or (4), the following table indicates CCI's suppliers since the beginning of operations. Documents such as invoices, bill of ladings, and a purchase order book for receiving these hazardous substances are available.

Hazardous Substance - Raw Material	Supplier's Name	Supplier's Address
	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Acetic Acid	Duso Chemical	173 Smith Street Poughkeepsie, N.Y. 12602
	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Adipic Acid	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Ammonia	Jones Chemical	80 Munson Street LeRoy, N.Y. 14482
	Textile Chemical	990 Jersey Ave. New Brunswick, N.J. 08901
Benzoic Acid	JLM Industries	8675 Hidden River Parkway Tampa, FL 33637
Methanol	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Methylene Chloride	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Toluene	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Xylene	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901

For laboratory supplies, the following table provides information regarding suppliers:

Laboratory Material Name	Supplier's Name	Supplier's Address
	PCI Scientific Supply, Inc.	41 Plymouth Street
Acetic Acid		Fairfield, N.J. 07004
Adipic Acid		:
Benzoic Acid	J.T. Baker	89 Newbury Street
Chloroform		Suite 103
Methylene Chloride		Danvers. MA 01923
Methanol		
Toluene	Fisher Scientific	711 Forbes Avenue
Xylene		Pittsburgh, PA 15219-4785

For the hauling and disposal of listed substances, such as waste water, plant and laboratory solvents, in items (3) or (4), the following table indicates CCI's past and present transporters and disposal facilities. Documents, such as manifests, for the disposal of these hazardous substances are in Attachment 11.

Hazardous Substance	Transporter Name	TSD Name
Methanol, Xylene Waste Flammable Liquids	Freehold Cartage Inc.	ECOFLO 2700 Patterson St. Greensboro. NC 27407
Dye Waste Water Non-Hazardous	Chemical Waste Management	Chemical Waste Management 100 Lister Ave. Newark, NJ 07105
Methanol, Xylene Waste Flammable Liquids	Oldover Corporation	Oldover Corporation Route 1. State Road 651 Arvonia. VA 23004
Chloroform. Methylene Chloride. Xylene Laboratory Solvents Waste Flammable Liquids	Tri-State Motor Transit Co.	Rineco 1007 Vulcan Rd Haskell Benton. AR 72015
Dye Waste Water Non-Hazardous	Laidlaw Environmental Services	Laidiaw Environmental Services 3527 Whiskey Bottom Rd. Laurel, MD 20724
Dye Waste Water Non-Hazardous	Maumee Express	Rineco 1007 Vulcan Rd Haskell Benton, AR 72015
Waste Dye (HC Yellow # 2)	Franks Vacuum Truck Service Inc.	Research Oil Company 2655 Transport Rd. Cleveland. OH 4415
Methanol, Xylene Waste Flammable Liquids	Freehold Cartage Inc.	Systech Environmental 11397 County Rd. 176 Paulding. OH 45879

12 a) & b) There has been no sampling of the soil, ground water, or surface water at the facility for purposes other than those identified in the responses above. However, an Occupational Health Survey was conducted by CCI's insurance company to evaluate employee exposure to possible various airborne contaminates. The survey included air sampling for xylene, methanol and others. As a result, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminates. Attachment 12 contains the report provided by CCI's insurance company.

13 a) Yes, CCI has owned the facility at 29-75 Riverside Ave. - Building # 17 since July 1, 1986. Attachment 1 contains a copy of the deed of sale. The property was purchased from Industrial Development Associates, Inc..

13 b) N/A

13 c) In 1888 the Freeholders of Essex County sold the property to Triton Boat Club of Newark. This transaction is recorded in Essex County Deed Book K-24. Page 133. On May 16, 1902, Patton Paint Company acquired the property from the Triton Boat Club of Newark, as recorded in Deed Book I-35, Page 270. Patton Paint Company was a manufacturer of paint and varnishes.

Thereafter, Pittsburgh Plate Glass Co. which manufactured paint and varnishes, took the subject property. The property was identified as Block 614, Lot 1. The current facility - Building # 17 - was constructed by the Pittsburgh Plate Glass Co. as a chemical resin manufacturing facility for its operation. PPG, Inc. which was formerly called Pittsburgh Plate Glass Co. purchased the property on January 31, 1941, and held the property to August 2, 1971.

In 1971, the site was sold to a developer, Riverside Ave. Properties, Inc. Deed Book 4382, Page 1023. Riverside Ave. Properties, Inc. thereafter leased the site. On October 11, 1979, the property was sold to another developer, Industrial Development Corporation, which sold the property a month later to Industrial Development Associates. The principal of Industrial Development Associates is Anthony V. Pugliese, III. Industrial Development Associates leased the building to S.B.S. Chemicals, Inc. and Desachem Co., Inc, manufacturers of chemicals and detergents. S.B.S. Chemicals and Desachem Co., Inc occupied Building # 17 pursuant to a lease agreement with Industrial Development Associates, which argument expired on August 14, 1985. Thereafter, the building was vacant and the lot and block numbers were changed and subdivided from Block 614, Lot 1 (partial) to Block 614, Lot 66. CCI has no relationship with the past owners or tenants.

- 14 (a) The legal name of the company is Chemical Compounds Inc..
- 14 (b) The president of the company is Mr. Alberto Celleri. Mr. Celleri's address is 10 Baldwin Court, Roseland, NJ 07068.
- 14 (c) Chemical Compounds Inc. is incorporated in the state of New Jersey.
- 14 (d) Attachment 13 contains a copy of the company's "Certificate of Incorporation" and amendments thereto.
- 14 (e) CCI is not a subsidiary or affiliate of another company.
- 14 (f) Chemical Compounds Inc. has no predecessor organization.
- 14 (g) Chemical Compounds Inc. has not acquired nor merged with any other company.
- 14 (h) N/A
- 14 (i) There are no previous owners of CCI.
- 15. The person answering this Request for Information is Alberto Celleri, President of CCI, 10 Baldwin Court, Roseland, New Jersey 07068 (201) 364-0370. Mr. Celleri has personal knowledge of the responses. Mr. Jim Giannotti, 72 Califon Drive, Colonia, NJ 07067, (908) 382-5591, a Chemical Engineer at CCI, assisted with the preparation of these responses.

DATE OF VISIT:

1/7/92

COMPANY NAME:

Chemical Compounds, Newark

COMPANY REPS:

Harold Sullivan, President

Alberto Celleri, Vice President

CRIMINAL JUSTICE:

Frank Bradley Vincent K. Cino

Fern Siegel

DEPE EMERGENCY

RESPONSE:

Matthew Garamone

NEWARK HAZMAT:

Battalin Chief, Anthony L. Apostolico

ENSI:

Fred Virazzi

PVSC REP:

R. Quintieri

PURPOSE:

Illegal Discharge

SUMMARY:

In response to a report by New Jersey Criminal Justice of an illegal discharge by Chemical Compounds, I was dispatched to investigate the situtation. Upon arrival to the facility at 1:30 pm, I spoke to Mr. Cino, Criminal Justice, who told me that the Maritime police had caught Chemical Compounds illegally discharging wastewater to the river and to the groundwater at the side yard. At the time of my investigation the company had stopped production and all discharges.

I began my investigation by inspecting his process area. There was still trace liquid from his wastewater discharge at the floor drain, the pH was bewteen 2 & 3. I informed Mr. Sullivan, the president of Chemical Compounds, that it was illegal to discharge any waste wastewater below 5.0. I also reminded him the Chemical Compound is not allowed to discharge any of their wastewater because the Company has elected to be considered a zero discharge regulated facility, and has been filing zero discharge reports. Mr. Sullivan stated the company has recently added an additional product line and was in the process of requesting an application to discharge.

Mr. Sullivan then referred me to Mr. Celleri, Vice President. Mr. Celleri stated that the spill in the process area was caused while the company was transferring the spent acetic acid from their centifuge which is used to remove the spent acid from his product to the CWM tanker located in the yard outside of the process area.

We then proceeded to the stairs outside of the process area where two 5000 gallon tank trailers are parked. Mr. Sullivan stated they pump their process wastewater to the tanker which is then shipped to Chemical Waste Management.

Examination of the yard showed several areas of surface water mixed with waste product. There was also an excavation surrounding their sewer line. Mr. Sullivan stated that the sewer was blocked. (The cause of the blockage was found to be a plug in the line by Napp Greco. The city directed Napp Greco to remove the plug).

The Criminal Justice Department required Chemical Compounds to hire ENSI to immediately remove the surface water and to make preparations to remove the contaminated soil. ENSI used a vaccum pump to pump the water into 55 gallon drums. When ENSI began pumping the wastewater, the Criminal Justices Officals felt that the situation was under control and left the facility.

RECOMMENDATION:

I recommend that Chemical Compounds be sited for discharging effluent waste below 5.0, discharging noxious odor and incorrectly reporting zero discharge. The company should also be directed to install a pH control system. I left a Sewer Connection Application with Mr. Sullivan.

R. Ouintieri

RQ/mc

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY BUREAU OF EMERGENCY RESPONSE

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FIELD NOTICE OF VIOLATIONS

THE ROTTOL C	N VIOLATIONS
CASE NO. 92-01-07-1025	DATE 01/07/92
CASE NAME CHEMICAL COMPOUNDS]	NC. ILLEGAL DUMPING
INCIDENT LOCATION PASSATC RIVER	+ RIVERSIDE AIT., MEIARK
RESPONSIBLE PARTY ADDRESS CHEMICAL	COMPOUNDS
29-75 Rivers	ide Ave, Nejart NJ. 07/04
RESPONSIBLE PARTY REPRESENTATIVE AL CO	ELLERI HAROLD SULLTIAN
You are hereby NOTIFIED that during an investigation by DEP of Statute and/or Regulation were observed. This violation has be file. In addition, this case is being forwarded to the appropriate action be taken.	en recorded as part of a permanent enforcement history
NJSA 58:10-23.11C,	SPILL COMPENSATION AND CONTROL ACT
NJSA-23:5-28	POLLUTION AND OBSTRUCTION OF WATER
NJAC 7:26— ,,	HAZARDOUS WASTE REGULATIONS
DESCRIPTION OF VIOLATION DISCRIPTE & MON-10	Hication of a discharge of a horason
substance into the writers and onto the	e land of the State of M.J.
pulsuant to the stipulations of the	Spill Compensation and Control
Act of Le State of N.J.	
Within have within days of receipt of this notice, you shall submorelow, an account of the incident and corrective measures taken	nit in writing, to the address and investigator indicated to attain compliance.
	gator Matthew Garamone SS NJOEPE- FINELINENCE RESONANT.
Addres	ES N. 1 UDI F FINH FOR INCU KESANAOS APONTO T.

COPIES:

White - File

Yellow - Investigator

Pink - Responsible Party

New Jersey Department of Environmental Protection

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COMMUNICATIONS CENTER NCTIFICATION REPORT Received: 1/07/92 TD Log # Operator:JIMH Case # 92-1-7-1025-33 Notification Type: Other Affiliation PICCITTO 201-578-8173 NJSP MARINE Street Address Municipality Incident Location: Other Site NEXT TO Phone Street Address Municipality County
1500 MCCARIHER HWY NEWARK ESSEX
Location Type Industrial Incident Date 1/07/92 Substance Released UNKNOWN LIQUID Amount Released ()UNK ID:Unknown State Liquid CAS# Release Is Continuous Additional Substances Substance Contained? N Hazardous Material? U TCPA? U A310 Letter? Y COMU CODE: 0714 REF CODE: 001 Incident Description Illegal Dumping Injuries? N Public Evac? N Facility Evac? N Public Exposure? Y Police On Scene? Y Firemen On Scene? N DEP Requested? Y Wind Sp/Dir Contamination Of Land, Water Receiving Water PASSAIC RIVER Status At Scene DUMPING FROM PIPE TO LOT AND IMTO RIVER Responsible Party Known Party POLITICAL COMP. INC Phone Contact. Title Street Address Municipality
CARTHER HWY MEMBER County

MCCARTHER HWY NEWARK

ESSEX

OFFICIALS NOTIFIED

NAME TITLE PHONE DATE TIME NJSP : OEM OPER 41 MUNIC: NEWARK CITY

609-882-2000 1/07 201-733-7400 1/07 1034

Affiliation Method Date Time T/M
DRPSR ERL Office 1/07 1030 T
OEP Monitoring Faxed 1/07 T
DFG HQL Faxed 1/07 T 1. C.GIBBONS

COMMENTS

New Jersar Department of Environmental Projection

COMMUNICATIONS CENTER NOTIFICATION REPORT Received: 1/09/92 TD Log # 472 Operator:RICH Case # 92-1-9-1027-18 Notification Type: Other Affiliation DIV CRIMINAL JUST. 908-686-0364 INV VINCE CINC Street Address Municipality Incident Location: Facility Site CHEMICAL COMPOUNDS INC Phone 201-485-3211 Street Address Municipality County
29-75 RIVERSIDE AVE NEWARK ESSEX
Location Type Industrial Incident Date 1/09/92 Time 1015 Substance Released UNKNOWN LIQUID Amount Released ()UNKNOWN ID:Known State Liquid CAS# Release Is Continuous Additional Substances Substance Contained? N Hazardous Material? U TCPA? U A310 Letter? Y COMU CODE: 0714 REF CODE: 001 Incident Description Illegal Dumping Injuries? N Public Evac? N Facility Evac? N Public Exposure? N Police On Scene? N Firemen On Scene? N DEP Requested? Y Wind Sp/Dir Contamination Of Land, Water Receiving Water PASSAIC RIVER Status At Scene COMPANY RESUMING ILLEGAL DUMPING FROM ANOTHER POINT, PUMPING FROM PIT INTO OPEN LOT Responsible Party Known Party CHEMICAL COMPOUNDS I Phone 201-485-3211 Title OWNER Contact ALBERTO CELLERI Title OWNER
Street Address Municipality County
29-75 RIVERSIDE AVE NEWARK ESSEX OFFICIALS NOTIFIED NAME PHONE DATE TIME TITLE NJSP : OEM 609-882-2000 1/09 MUNIC: NEWARK CITY 201-733-7400 1/09 Affiliation Method Date Time T/M DRPSR ER1 Office, Faxed 1/09 1028 T OEP Monitoring Faxed 1/09 T Name 1. CHRIS GIBBONS 3. COMMENTS

RESP 16 ENROUTE @ 1039 HRS

Form DEP-061 C 9/88

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AC PAGE 1 OF LE

	DUTY OFFICER NOTIFICATI	ION REPORT
		CASE NO. $\frac{92}{(Y_1)} - \frac{0}{(M_0)} - \frac{07}{(D_{0})} - \frac{1025}{(Time)}$
DATE 01 - 07- 91	REC'D BY	TIME

·		····
Name Operator Pictar Ho	Phone 578-8173	
Street		
	State	
Affiliation/Title	Olaio	
INCIDENT LOCATION: Transport	ortation Facility Other:	
	ighway Phone	
Street	97.75	
	County ESSEX State Zip Code	
	ime: _1016	
(Mo) (Day) (Yr)		
IDENTITY OF SUBSTANCE(S) SOULED B	DELEACED ETC.	
IDENTITY OF SUBSTANCE(S) SPILLED, R Name of Substance(s) [Gas, Liquid, Solid]:		
		. B
Amount Released/Spilled Ac		
Terminated	Continuou Intermittent Hazardous Material Y	' N U
NCIDENT DESCRIPTION:		
Fire Explosion Air Ro	iel Spill MVA Deraffment Sn	noke/Dust
Odors Sewage NJPD		ums
Equip Start-Up/Shutdown, Equip Fail/Upset, etc		
Other (specify)		
njuries Y (N)U	Public Exposure (Y) N U	
facility Evacuation Y (N) U	Fire Department at Scene Y (N) U	
opulation Evacuation Y NL U	Police at Scene (Y) N U	
otable Water Source Y (N) U	Assistance Requested (Y)N U	
contamination of Air Land Wate		
leceiving Water <u>Passaic River</u>	Wind Direction/Speed/	
ocation Type: Residential Industrial	Commercial Rural Sensitive Population (Hosp., School, Nur	s. Home)
TATUS AT INCIDENT SCENE Dempins Fr		
1 /		
RESPONSIBLE PARTY: Suspec		
1	nc. Phone	
	Title	
Street 1888 Miller for Highway		
ity A/CV/Av/	County State Zip Code	
OFFICIALS NOTIFIED (Name/Title):		
	Phone Date/Time /	(T/AA)
111 111	/ IIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	(Т/М) RA-B-0

New Jersey Department of Environmental Protection and Energy Division of Responsible Party Site Remediation Bureau of Emergency Response Region I

INVESTIGATION

Case #: 92-1-9-1027-18

File #: 0714 PAC CODE:

Date: 1/15/92

Investigator: Christopher Gibbons

Time Arrived:

Time Departed:

Address:

Location: Chemical Compounds Inc. 29-75 Riverside Avenue

Newark, Essex County

Responsible Party: Chemical Compounds Inc.

Mailing Address: 29-75 Riverside Avenue

Newark, Essex County

Location Phone #: 485-3211

Health Dept. Rep: None

Phone #:

Origin of Complaint: Vince Cino, DCJ

Phone #: 908-686-0364

Nature of Complaint: Inspector Cino received call from Napp Grecko Corp. of continuing illegal dumping from Chemical Compounds Inc. Assistance is requested.

Findings: Inspector Gibbons responded to the above location to investigate illegal dumping from Chemical Compound Inc. (see report case numbers 92-01-07-1025 and 92-01-08-1147). This request for a response came from Investigator Vince Cino, DCJ who was notified by Napp Grecko Corp. of continuing illegal dumping at the Chemical Compounds Inc. site.

On site Inspector Gibbons met with Robert Penn, Newark OEM, Chief Tony Apostilico, Newark HazMat and Vince Cino, and the situation was described as follows.

Because the main sewer truck line runs under the Napp Grecko Corp. repair garage, and acetic acid odors were noticed, Napp Grecko Corp. reported the incident. On site at Chemical Compounds Inc. no illegal dumping was occurring. Discharging through the sanitary sewer line was a acetic acid odor, pH3 water mixture. It was explained that the water was non-contact cooling water. No odors were noticed inside the Napp Grecko garage, and no readings were detected by Drager tubes for acetic acid inside the garage. DCJ Water Pollution Task Force took samples, then all responders secured the site.

Conclusions: BER I responded at the request of DCJ to a continuing illegal dumping problem at Chemical Compounds Inc. DCJ was notified by Management of Napp Grecko Corp. that since odors were noticed in a repair building directly over the main sewer truck line, Chemical Compounds must be dumping. In the sewer line was a non-contact cooling water which had a pH of 3 for an unknown reason and positive vapors for acetic acid were detected utilizing a Drager tube for the specific compound. No odors were detected in the Napp Grecko repair garage. DCJ Water Pollution task force obtained samples, then all

Recommendations: This case was referred to OEP-Metro and DFG & W.

NFA/BER I.

Investigator

Date

130 8004

Kerby, Cooper, English, Danis & Garvin

COUNSELLORS AT LAW

RIISSELL I KERBY, JR
JOHN W COOPER
JERRY FITZGERALD ENGLISH
ARTHUR H CARVIN III
GARY F DANIS, P E

RONALD J TELL STEVEN S GOLDENBERG* OF COUNSEL

RICHARD G MOSER 1940-1992 480 MORRIS AVENUE SUMMIT, NEW JERSEY 07901-1583

908-273-1212

FAX 908-273-8922

FREDI L. PEARLMUTTER*
KRISTI BEYER BRAGG*
STEPHEN R. GELLER*
PETER W. ULICNY
DONNA M. RUSSO**
DANIEL JON KLEINMAN***
HOLLY ENGLISH***
MARGARET R. KALAS**
MARY T. ZDANOWICZ
ROBERT A. MEYERS
RICHARD F. IGLAR*

"ALSO ADMITTED IN N Y.
"ALSO ADMITTED IN D C
"ALSO ADMITTED IN PA
""ADMITTED IN MA ONLY

May 25, 1993

John Ambrosio, Esq. 464 Valley Brook Avenue Post Office Box 911 Lyndhurst, New Jersey 07071

> Re: Chemical Compounds, Inc. Compliance Schedule

Dear Mr. Ambrosio:

As we discussed recently by telephone, we are the attorneys for Chemical Compounds, Inc., which submitted its Baseline Monitoring Report Addendum for Mass Limitations to the Passaic Valley Sewerage Commissioners (PVSC) on May 6, 1993.

As we also discussed, the sampling of Chemical Compounds' effluent has indicated the presence of toluene in its waste stream. So far the company has been unable to identify the source of the toluene, despite investigatory efforts.

In order to cope with the toluene issue, and to better control its effluent, Chemical Compounds is in the process of installing a holding tank at its facility. The effluent in the tank will be sampled before discharge, and should there be problems with the effluent, appropriate measures will be taken.

On behalf of Chemical Compounds we are hereby requesting a compliance schedule for instituting the above described measures and resolving the toluene problem. To this end, we think that it would be helpful to set up a meeting to discuss a compliance schedule and a Judicial Consent Order, which you indicated would be necessary.

. John Ambrosio, Esq. May 25, 1993 Page 2

Please advise us as to how you would like to proceed in determining a compliance schedule, and in negotiating a Judicial

Very truly yours

Stephen R. Geller

SRG:pbk

cc: Harold Sullivan

John Sabo

Jerry Fitzgerald English

Gary F. Danis

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600 WILSON AVENUE NEWARK, N.J. 07105 (201) 344-1800 Fax: (201) 344-2951 CARMINE T. PERRAPATO EXECUTIVE DIRECTOR

ROBERT J. DAVENPORT DEPUTY EXECUTIVE DIRECTOR

GABRIEL M. AMBROSIO CHIEF COUNSEL

> LOUIS LANZILLO CLERK

June 7, 1994

Mr. Harold E. Sullivan Chemical Compounds 29-75 Riverside Avenue Newark, New Jersey 07104

Certified Mail P 252 571 201

RE: NOTICE OF VIOLATION PERMIT #: 20407122

VIOLATION DATE: APRIL, 1994 SECTION VIOLATED: 40 CFR 414 SV

Dear Mr. Sullivan:

You are put on notice that your company is in violation of Federal Regulation 40 CFR 414 and Section 313.1 of the PVSC Rules and Regulations. A review of your MR-1 for April, 1994 revealed the following mass limit exceedances.

A sample for toluene taken by your company on 04/11/94 resulted in a mass loading of 0.30590 grams/day, exceeding the monthly average limit of 0.29615 grams/day.

Samples for total cyanide taken by your company on 04/11/94 and 04/29/94 resulted in mass loadings of 6.57693 grams/day and 0.76476 grams/day respectively. A sample for total cyanide taken on 04/27/94 by PVSC resulted in a mass loading of 122.36148 grams/day, which exceeded the daily maximum limit of 12.69196 grams/day. Additionally, the average of all three samples was 43.23438 grams/day, exceeding the monthly average limit of 4.44219 grams/day by more than 20%.

You should be aware that a monthly average of all samples taken either by you or PVSC that is 20% or more above the monthly average limitation for a hazardous pollutant makes the violation a serious violation and that two (2) serious violations in any six month period would make a company a Significant Non Complier (SNC). In addition, four monthly average violations of any amount in any six month period would also make a company SNC. This would subject your company to mandatory minimum fines under the Clean Water Enforcement A_{TIERRA-B-004412} (CWEA).

RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS June 7, 1994 Page 2

Based upon the explanation given above, your company has committed a serious violation as defined by the Clean Water Enforcement Act. In view of the fact that this matter is in litigation, a copy of this letter is being referred to the PVSC Counsel. Another item we must bring to your attention is that you must list your permit requirements and sample measurements on the MR-1 in five decimal places. Since this was not done on the April 1994 report, it appeared that toluene was in compliance, when in fact it was not. If you have any questions, please call Andy Caltagirone at (201) 817-5723.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Coming T. D.

Carmine T. Perrapato Executive Director

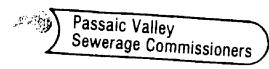
CTP/mc

cc: Robert Davenport, Deputy Executive Director Frank P. D'Ascensio City of Newark Gabriel M. Ambrosio, Esq.

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COMMISSIONERS



600 WILSON AVENUE NEWARK, N.J. 07105 (201) 344-1800 Fax: (201) 344-2951 ROBERT J. DAVENPORT EXECUTIVE DIRECTOR

> PETER G. SHERIDAN CHIEF COUNSEL

LOUIS LANZILLO

October 7, 1994

Mr. Alberto Celleri Chemical Compounds 29-75 Riverside Avenue Newark, New Jersey 07104

Certified Mail P 252 571 857

RE: NOTICE OF VIOLATION PERMIT #: 20407122 VIOLATION DATE: AUGUST, 1994 SECTION VIOLATED: 40 CFR 414 SV

Dear Mr. Celleri:

You are put on notice that your company is in violation of Federal Regulation 40 CFR 414 and Section 313.1 of the PVSC Rules and Regulations. A review of your MR-1 for August, 1994 revealed the following mass limit exceedances.

Samples for toluene taken by your company on 08/26/94 and 08/31/94 resulted in mass loadings of 0.09816 grams/day, and 2.29704 grams/day respectively. The 08/31/94 sample exceeded the daily maximum limit of 0.78267 grams/day. The average of the two samples, 1.19760 grams/day, exceeded the monthly average limit of 0.29615 grams/day by more than 20%.

Samples for ethylbenzene taken by your company on 08/26/94 and 08/31/94 resulted in mass loadings of 0.09816 grams/day and 15.07799 grams/day respectively. The 08/31/94 sample exceeded the daily maximum limit of 4.01912 grams/day. Additionally, the average of both samples was 7.57826 grams/day, exceeding the monthly average limit of 1.50188 grams/day by more than 20%.

A sample for lead taken by your company on 08/31/94 resulted in a mass loading of 4.51554 grams/day, which exceeded the monthly average limit of 3.38452 grams/day by more than 20%.

A sample for zinc taken by your company on 08/31/94 resulted in a mass loading of 13.74296 grams/day, which exceeded the monthly average limit of 11.10547 grams/day by more than 20%

RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS October 7, 1994 Page 2

You should be aware that a monthly average of all samples taken either by you or PVSC that is 20% or more above the monthly average limitation for a hazardous pollutant makes the violation a serious violation and that two (2) serious violations in any six month period would make a company a Significant Non Complier (SNC). In addition, four monthly average violations of any amount in any six month period would also make a company SNC. This would subject your company to mandatory minimum fines under the Clean Water Enforcement Act (CWEA).

Based upon the explanation given above, your company has committed four serious violations as defined by the Clean Water Enforcement Act. Since zinc and lead are covered in the upcoming Judicial Consent Order your company will enter into with PVSC, additional penalties will not ensure for these parameters if this matter is settled. However, since the toluene and ethylbenzene violations are not covered in the JCO, your company is subject to CWEA fines. The CWEA stipulates a fine of \$1,000 for each parameter seriously violated. You may avoid further legal action if you remit \$2,000 within 30 days of receipt of this letter. Please make the check payable to PVSC and forward it to the attention of Carmen DellaPia, Operations Coordinator. In view of the fact that this matter is in litigation, a copy of this letter is being referred to the PVSC Counsel.

In a related matter, we have received your letter dated 09/16/94, wherein you requested to have your OCPSF mass limits revised. In support of your request, you submitted flow data from 03/94 through 08/94, which show a 51% increase over the flow data submitted with the 1993 Baseline Monitoring Report, the basis of your current mass limits. A PVSC Inspector will visit your facility in the very near future to discuss this matter with you.

As for your other request in the 09/16/94 letter we cannot make any modified limits, if any are granted, retroactive to August 1, and thereby reduce or eliminate the aforementioned violations. This is because any change to your Sewer Connection Permit which might be considered would be subject to approval by the Commissioners at their next scheduled meeting, and would not take effect until time

Page 3 October 7, 1994

If you have any questions, please call Andy Caltagirone at (201) 817-5723.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Robert Daverport of

Robert J. Davenport
Executive Director

RJD/mc

cc: Frank P. D'Ascensio Carmen DellaPia Andy Caltagirone

Andy Caltagirone Gabriel M. Ambrosio, Esq.

City of Newark

ROBERT J. DAVENPORT EXECUTIVE DIRECTOR

PETER G. SHERIDAN

LOUIS LANZILLO

CLERK

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Passaic Valley Sewerage Commissioners

600 WILSON AVENUE NEWARK, N.J. 07105 (201) 344-1800 Fax: (201) 344-2951

February 9, 1995

Certified Mail P 258 625 759

Mr. Alberto Celleri Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, New Jersey 07104

RE: NOTICE OF VIOLATION PERMIT #: 20407122

VIOLATION DATE: DECEMBER, 1994 SECTION VIOLATED: 40 CFR 414

SNC-ZINC SNC- TOLUENE

SNC-ETHYLBENZENE

SV-CYANIDE

Dear Mr. Celleri:

You are put on notice that your company is in violation of Federal Regulation 40 CFR 414 and Section 313.1 of the PVSC Rules and Regulations. A review of your MR-1 for December, 1994 revealed the following mass limit exceedances:

A sample for zinc taken by your company on 12/14/94 resulted in a mass loading of 29.03672 g/day, exceeding the daily maximum limit of 27.60502 g/day. Additionally, it exceeded the monthly average limit of 11.10547 g/day, by more than 20%.

A sample for cyanide taken by your company on 12/14/94 resulted in a mass loading of 5.58494 g/day. This exceeded the monthly average limit of 4.44219 g/day, by more than 20%.

A sample for toluene taken by your company on 12/14/94 resulted in a mass loading of 5.74737 g/day, exceeding the daily maximum limit of 0.78267 g/day. Additionally, it exceeded the monthly average limit of 0.29615 g/day, by more than 20%.

RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS, INC. February 9, 1995
Page 2

A sample for 2-nitrophenol taken by your company on 12/14/94 resulted in a mass loading of 0.74966 g/day. This exceeded the monthly average limit of 0.68748 g/day.

A sample for ethylbenzene taken by your company on 12/14/94 resulted in a mass loading of 2.99863 g/day. This exceeded the monthly average limit of 1.50188 g/day, by more than 20%.

You should be aware that a monthly average of all samples taken either by you or PVSC that is 20% or more above the monthly average limitation for a hazardous pollutant makes the violation a serious violation and that two (2) serious violations in any six month period would make a company a Significant Non Complier (SNC). In addition, four monthly average violations of any amount in any six month period would also make a company SNC. This would subject your company to mandatory minimum fines under the Clean Water Enforcement Act (CWEA). Based upon the explanation given above, your company has committed its third serious violation for zinc in a six month period (following those in August and November), as a defined by the Clean Water Enforcement Act, making your company SNC for this parameter. Chemical Compounds is also SNC for toluene and ethylbenzene. There was also a serious violation for cyanide.

This will also confirm that Chemical Compounds is operating pursuant to the terms and conditions of a Judicial Consent Order. The compliance date for lead, zinc and cyanide is no later than 04/01/95. Accordingly, so long as you adhere to the compliance schedule and other conditions set forth in the JCO, Chemical Compounds will not be subject to additional enforcement action or civil penalties for having violated the lead, zinc, and cyanide limitations of its permit. Toluene and ethylbenzene are not included in the JCO and are subject to additional enforcement action. In view of these violations a copy of this letter is being forwarded to the PVSC attorney.

RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS, INC. February 9, 1995 Page 3

If you have any questions please call Andy Caltagirone at (201) 817-5723.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Robert J. Davenport

Executive Director

RJD/mc

cc: Frank P. D'Ascensio

Gabriel M. Ambrosio, Esq.

City of Newark Carmen DellaPia

Page of Z

INVESTIGATION

CASE #: 42-01-07-1025	DWM FILE #: 07-14-5-1 8
*	
INVESTIGATOR: Greatich, Gary	DATE: 3/1/92 TIME DEPARTED:
LOCATION: Chemical Compounds	PROPERTY OWNER: Chemical Canal
ADDRESS: 89-75 Riverside Ave	MAILING ADDRESS: 29-75 Ricerside Are
Newark County. Essax	Louish UT Orion
BLOCK: 614 LOT: 66	RESPONSIBLE DADTY
LOCATION TELEPHONE #: 485-3215	ADDRESS:
EPA ID #:	1001000
LOCAL HEALTH DEPT, REP.	TELEPHONE #: // 2
OPICINI OF COMPLAINTS.	
NATURE OF COMPLAINT: Z//equil dumping a	of water land
PHOTOGRAPHS TAKEN:	SAMPLE #:
FINDINGS:	
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the complaint of illegal dun	2° G //2
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information was detailed b	5 11: Buckground
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unpleasant vapors which	and continue ting from the
from the behind his building	1. I here odors came
from the washing down of	+ a small spill in the
facility so to the floor of	4
through the sanitary line	e. as a result of the
sanitury love bring unus	able the company was
unable to operate various	\
twaste water (water-sunt in and	Dinto a holding tunk. Once
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into one of two 5000 gall	lan tank wayons located
on the side of the famility	The waste water mixture
is disposed of under manit	est as X-900 non-hazanlous
to Chamical Waste Muniquest	m Newark. as the wiskers
Sand Old	
Supervisor Signature	Investigator Signature

COPIES:

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Pink - Investigator

INVESTIGATION

CASE # 92-01-07-1075

DATE: 5/11/92

FINDINGS AND SUMMARY:	
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for the day.	
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or Through COM. of	- to PSSE should the company
get its permit, the	drummed material is the same as
three normal won hara	rdous material presently shipped
to cum.	19 30.175
Carry 15 Cair L	200blem in the future the
the said of the	nstall a new connection for
The santacy In F	hat does not run under the
neighbors property an	d is applient for a permet to
discharge Mier was	te muter (process) to PUSC.
Moon review of the	sul analysis there does
not appear to be any	remaring Contamination surfice!
above thee presently	established acceptable levels.
at the present time	no further action is recommended
for this incident	
2.	
	6,
Land Oak	Harthulet
Supervisor Signature	Divestigator Signature

COPIES

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Yellow · Local Health Dept.

Pink - Investigator

Include directional arrow.

Supervisor Signature

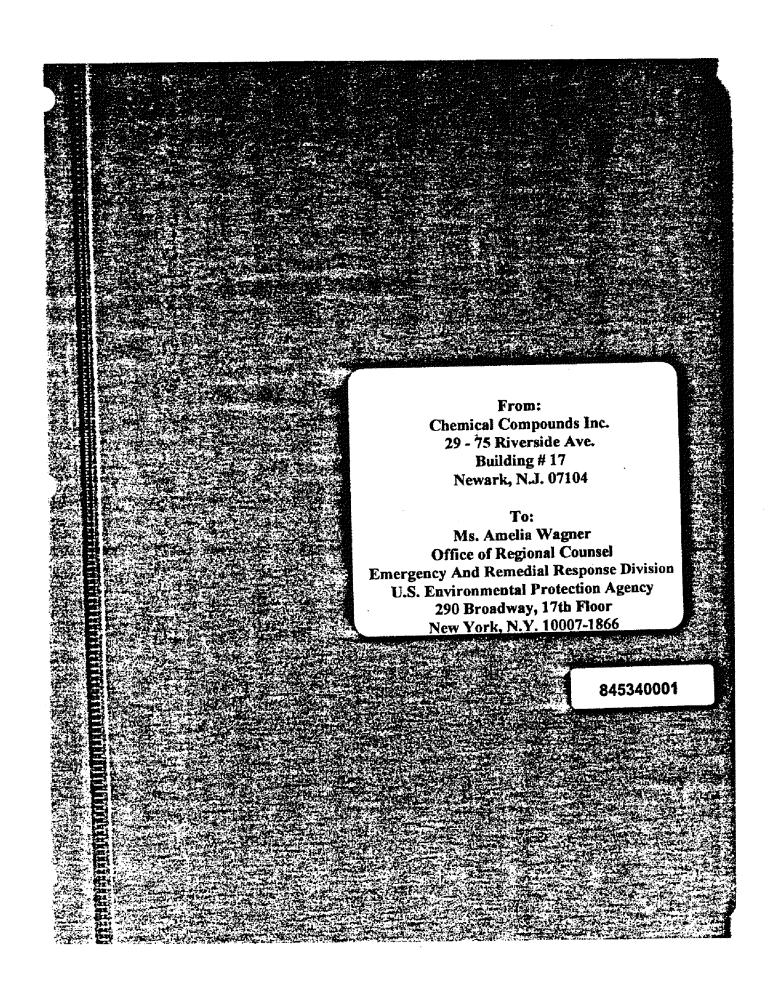
Investigator Signature

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CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park

29-75 Riverside Avenue • Newark, New Jersey 07104

(201) 485-3211-2 • Fax: (201) 485-4870

Emergency and Remedial Response Division U.S. Environmental Protection Agency 290 Broadway, 17th Floor Office of Regional Counsel New York, New York 10007-1866

August 8, 1996

To Ms. Amelia Wagner,

Please find enclosed the following responses to the "Request for Information" received on July 10, 1996 at Chemical Compounds Inc.. If you should have any further questions or require additional information, please feel free to contact Jim Giannotti at (201) 485 - 3212.

Sincerely,

Jim Giannottti jg./JG

c.c: AC/SG

RECEIVED

ATTACHMENT A

REQUEST FOR INFORMATION

Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located at 29-75 Riverside Avenue in Newark, New Jersey may have been discharged into the Passaic River.

Please provide the information requested below, including copies of all available documentation that supports your answers.

- 1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?
- 2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq.? If "yes", please provide the years that your company held such a permit and its EPA Identification Number.
- b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. § 1251, et seq.? If "yes", please provide the years that your company held such a permit.
- 3) Did your company receive, utilize, manufacture, discharge, release, store or dispose of any materials containing the following substances:

	ies	NO
2,3,7,8 tetrachlorodibenzo-p-dioxin		
or other dioxin compounds		
Acetic acid		
Adipic acid		
Ammonia		
Aniline		
Benzene	·	
Benzo(a) anthracene		
Benzoic acid		
Benzyl chloride		
Butyl benzyl phthalate		
Chlorobenzene		
Chloroethylene		
Chloroform		
1,2-dichloroethene		
Di-n-butyl phthalate		
Ethyl benzene		

	Yes	ИО
Fluoranthene		
Methanol		
Methylene Chloride		
2-methylnapthalene		
Naptha distillate		
Napthalene		
2-nitrophenol		
Petroleum ether		
Phenanthrene		
Pvrene		
Tetrachlorobenzene		
Tetrachloroethane		
Tetrachloroethylene		
Trichloroethane		
Trichloroethylene		
Toluene		
Xylene		
Arsenic		
Cadmium		
Chromium	_ 	
Copper		
Lead		
Mercury		
Nickel		
Silver		
Zinc		
Cyanide		
PCBs		

- 4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or by-product.
- b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?
 - i) Describe the chemical composition of these hazardous substances.
 - ii) For each process, what amount of hazardous substances was generated per volume of finished product?
 - iii) Were these hazardous substances combined with wastes from other processes? If so, wastes from what processes?

- 5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4). Include information on the following:
- a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.
- b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.
- c) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.
- i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.
- ii) When drums were stored outside, were empty drums segregated from full drums?
- d) What processes do you use to treat your waste? What do you do with the waste after it is treated?
- 6) a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):
 - i) Was the waste stream discharged into a sanitary sewer and if so, during what years?
 - ii) Were they treated before being discharged to the sanitary sewer and if so, how? Please be specific.
 - iii) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?
 - iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.
- b) For floor drains or other disposal drains at the facility:

- i) Did the drains connect to a sanitary sewer and if so, during what years?
- ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?
- c) i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?
 - ii) If catch basins or lagoons existed, were they lined or un-lined?
 - iii) What was stored in the lagoons?
 - iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released, and during which years?
- d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.
- e) Also, EPA has information relating to several instances of discharge of process waste water into the sewer system in 1992 and 1995. Please provide a detailed description of these incidents.
- 7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.
- b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.
- 8) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4), were released on the property, into the waste water or storm drainage system at the facility or

- to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.
- a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.
- b) Also, EPA has information that due to an industrial sewer line break in 1992, an unreported quantity of aniline was discharged to the Passaic River. Please provide all information relating to this and any other discharges and any measures taken to mitigate the impact of the discharges.
- 9) a) Was your facility ever subject to flooding. If so, was the flooding due to:
 - i) overflow from sanitary or storm sewer back-up, and/or
 - ii) flood overflow from the Passaic River?
- b) Please provide the date and duration of each flood event.
- 10) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.
- a) EPA has information that your facility has received several notices of violation for discharges of waste water into the sewer system, including a NJDEPE Field Notice of Violation issued on January 7, 1992 and a PVSC Notice of Violation issued on February 9, 1995. Please provide information on how these violations were resolved.
- 11) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

- 12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?
- b) If so, please provide all other documents pertaining to the results of these analyses.
- 13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.
- b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.
- c) To the extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.
- 14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.
 - a) State the legal name of your company.
 - b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.
 - c) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.
 - d) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.
 - e) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.
 - f) Identify any predecessor organization and the dates that such company became part of your company.

- g) Identify any other companies which were acquired by your company or merged with your company.
- h) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified in the responses to items (14)(e), (f), and (g), above.
- Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.
- 15) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

ATTACHMENT B

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

- 1. A complete separate response must be made to each individual question in this "Request for Information".
- 2. Precede each answer with the number of the question to which it is addressed.
- 3. In preparing your response to each question, consult with all current or former employees and agents of your company who may be familiar with the matter to which the question pertains.
- 4. Interpret "and" as well as "or" to include within the scope of the question as much information as possible. If two interpretations of a question are possible, use the one that provides more information.
- 5. If you are unable to give a detailed and complete answer or to provide any of the information or documents requested, indicate the reasons for your inability to do so.
- 6. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number and the reasons for your belief.
- 7. For each document produced in response to this "Request for Information", indicate on the document, or in some other reasonable manner, the number of the question to which it applies.
- 8. If anything is deleted from a document produced in response to this "Request for Information", state the reason for, and the subject matter of, the deletion.
- 9. Provide all documents that relate to each question. If a document is requested but is not available, state the reason for its unavailability. In addition, to the best of your ability, identify any such document by author, date, subject matter, number of pages, and all recipients and their addresses.
- 10. As used herein "relate to" or "relating to" means constituting, defining, containing, embodying, reflecting, identifying, stating, referring to, dealing with, or in any way pertaining to. "Document" as used herein means any recording of information in tangible form, including memoranda, handwritten notes, invoices, checks, manifests, tape recordings, computer databases, or any tangible or physical objects however produced or reproduced upon which words or other information "are affixed or recorded or from

which by appropriate transcription written matter or a tangible thing may be produced."

- 11. Whenever in this "Request for Information" there is a request to identify a person or an entity other than a person, state the person or entity's full name, last known employment, present or last known home address, and telephone number.
- 12. As used herein, the term "facility," "hazardous substance," "person," and "release" shall have the meaning set forth in Section 101(9), (14), (21) and (22) of CERCLA, 42 U.S.C. §9601(9), (14), (21), and (22), respectively.
- 13. In answering these questions, every source of information to which you have access should be consulted, regardless of whether the source is in your immediate possession or control. All documents or other information, including records of all types of manufacturing, treatment, transportation or disposal operations, in your possession or in the possession of the Corporation should be consulted. If you do not have access to certain information and/or documents, state the nature of this information and/or documents, and indicate in whose possession they can be found.

****RESPONS TO QUESTIONS 4A IS REDACTED****

- iii) The hazardous substances located in the waste water stream are generated on batch scale operations. The by-products are present in the waste water stream after the separation of the product by filtration. After filtration, the waste water stream is treated for regulated effluent exceedances. After treatment, the waste water is stored in a 10,000 gallon tank. A number of process waste water streams will combine in the 10,000 gallon storage tank.
- 5 (a) The following table is a list of employees at CCI who were or are responsible for the management of hazardous substances:

Name	Title	Description of Responsibility
Alberto Celleri	Co-President	Overall Operations
Harold Sullivan	Co-President	Overall Operations
Arturo Celleri	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage
Jim Giannotti	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage

5 (b) The following table is a list of transporters who were responsible for off-site disposal; including non-hazardous waste water:

Transporter's Name	Address	TSD Name & Address
Franks Vacuum Truck Services, Inc. NYD982792814	4500 Royal Ave. Niagra Falls, NY 14303	Research Oil Co. 2655 Transport Rd. Cleveland, OH 4415 OHD004178612
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	Systech Environmental 11397 County Road 176 Paulding, OH 45879 OHD005048947
Laidlaw Environmental Services MDD980554653	3527 Whisky Bottom Road Laurel, MD 20424	Laidlaw Environmental Services 3527 Whisky Bottom Road Laurel, MD 20424
Maumee Express NJD986607380	P.O. Box 278 Somerville, NJ 08876	Rineco Chemical Ind. 1007 Vulcan Rd Haskell Benton, AR 72015 ARD981057870
Oldover Corporation VAD098443443	P.O. Box 68 Rt. 1, State Rd. 652 Arvonia, VA 23004	Oldover Corporation P.O. Box 68 Rt. 1, State Rd. 652 Arvonia, VA 23004
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	ECOFLO 2750 Patterson Street Greensboro, Maryland 27407 NCD980842132
Chemical Waste Management of NJ NJD089216790	100 Lister Avenue Newark, NJ 07105	Chemical Waste Management of NJ 100 Lister Avenue Newark, NJ 07105
Tri-State Motor Transit Co. MOD095038998	P.O. 113 Joplin, MO 64802	Rineco Chemical Ind. 1007 Vulcan Rd Haskell Benton, AR 72015 ARD981057870

5 (c) i)& ii) The following table is a list of storage practices for the hazardous substances included in items (3) & (4) since the beginning of operations:

	Name of Hazardous	Storage of the
	Substance	Hazardous Substance
	Acetic Acid	55 gallon Plastic Drum
		< 4 L Glass Bottle - Laboratory Scale
		5,000 gallon Tanker Truck - Waste
	Adipic Acid	50 lb. Bags / 2000 lb. Palates
		< 1 lb, Glass Bottle - Laboratory Scale
	Ammonia	150 lb. Cylinder
Raw Materials	Benzoic Acid	50 lb. Bags / 2000 lb. Palates
		< 1 lb. Glass Bottle - Laboratory Scale
	Chloreform	< 4 L. Glass Bottle - Laboratory Scale
		2 gal. Solvent Lab Disposal Container
-		55 gallon s/s drum - Waste
or	<u> </u>	5,000 gallon Tanker Truck - Waste
		4,000 gallon S/S Storage Tank - Waste
	Methanol	55 gallon Stainless Steel Drum
T - L		250 gallon Plastic Totes
Laboratory		4,000 gallon S/S Storage Tank - Waste
Supplies		5,000 gallon Tanker Truck - Waste
		< 4 L. Glass Jars - Laboratory Scale
		2 gal. Solvent Lab Disposal Container
		55 gallon s/s drum - Waste
	Methylene Chloride	55 gallon Stainless Steel Drum
	Woody Company	4,000 gallon S/S Storage Tank - Waste
		5,000 gallon Tanker Truck - Waste
		< 4 L. Glass Jars - Laboratory Scale
	i l	2 gal. Solvent Lab Disposal Container
		55 gallon s/s drum - Waste
	Toluene	55 galion Stainless Steel Drum
	1	4,000 gallon S/S Storage Tank - Waste
		5,000 gallon Tanker Truck - Waste
		< 4 L. Glass Jars - Laboratory Scale
		2 gal. Solvent Lab Disposal Container
	1	55 gallon s/s drum - Waste
	Xylene	55 gallon S/S Drum
		250 gallon Plastic Totes
	1	4,000 gailon S/S Storage Tank - Waste
	1	5,000 gallon Tanker Truck - Waste
		< 4 L. Glass Bottles - Laboratory Scale
		2 gal. Solvent Lab Disposal Container
		55 gallon s/s drum - Waste
	By-Products found in the waste water stream:	55 gallon drum - Waste
Waste Water	Aniline, Bonzono,	400 4 000 11 - 0 15 51 57 1
Storage	Benzuic Acid, Chlorobenzene,	400 - 4,000 gailon S/S Storage Tank
	Chloroform, Bhyl Benzene, Methanol, Methylene Chloride	10.000 th 0/0.5: The 1
יאמטנוגיווויסומבט מממן		
(ppb Concentrations) Based on Analytical	Naphthalene, 2-Nitrol henel,	10,000 gailon S/S Storage Tank

The 55 gallon drums or 250 gallon Plastic totes containing hazardous substances listed in items (3) & (4) are stored on wooden palates outside on either a paved area with asphalt or a concrete pad. (See Attachment 5 for a facility layout for the storage areas of hazardous substances.)

In December 1993, a concrete diked area was constructed outside the building located on the southeast part of the building with a capacity of 25,000 gallons. The diked area is within an 18 inch thick concrete berm approximately 4 feet high. Inside is the waste water storage area with (2) 4,000 gallon Above Ground S/S Storage tanks and (1) 10,000 gallon Above Ground S/S Storage Tank on top of an 8 inch concrete slab. In the past, the waste water and or flammable solvents such as methanol, xylene, & toluene were stored in a 5,000 gallon Tanker Truck in that same area. In addition, waste flammable liquids were stored in a 4,000 gallon Above Ground S/S Storage Tank in the diked area. Since September 1995, waste flammable liquids have been recycled. Currently, the 4,000 gallon S/S Storage Tank is being utilized for waste water storage.

Empty drums are segregated from full drums. The empty drums are located at the most southeastern part of the property, adjacent to or in an enclosed shed.

5 (d) The waste water streams are treated by neutralization, chemical precipitation, or carbon filtration. The process waste water streams are transferred to one of (2) 1,500 gallon mixing tanks for the introduction of treatment. One treatment involves neutralization by the addition of Sodium Hydroxide or Sulfuric Acid to meet discharge regulations. Another treatment involves carbon filtration for the removal of organics. The drain water is collected in an Above Ground S/S Storage Tank located in the basement and treated for heavy metals. The treatment for the drain water involves chemical precipitation with the addition of lime followed by filtration. After treatment, the waste water is transferred to a storage tank and analyzed.

If the treatments are effective, the waste water is transferred to a 10,000 gallon Above Ground S/S Storage tank. After the tank is full the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the PVSC sanitary sewer which flows approximately 70 yards to an interceptor of the industrial park. The solid waste generated from treatment is non-hazardous and disposed off-site to a regulated facility. Carbon filtration and chemical precipitation treatment methods have only been used since October, 1995. Prior to that time, the waste water was treated by neutralization.

- 6 (a) i) From July 1992 to the present, the process waste water stream was discharged into a sanitary sewer connected with Passaic Valley Sewerage Commissioners. Before July, 1992, the process waste water stream was connected to a 5,000 gallon tanker truck for off-site disposal.
 - ii) Yes, the waste water stream is treated before discharging into the sanitary sewer. The water is treated by neutralization, chemical precipitation, and carbon filtration. (See 5 (d) for details of the treatment methods.)
 - iii) Before CCI obtained a permit for discharge to the sewer, the waste water stream was collected in a 5,000 gallon tanker truck. When the tanker truck achieved maximum capacity, the water would be sent to a TSD facility for treatment. CCI obtained a permit for discharging process waste water to the sewer on July 20, 1992. (See Attachment 11, for manifests.)
 - iv) Attachment 4 contains analytical results of process waste water streams.
- 6 (b) i) & ii) From 1986 February, 1992, the main manufacturing floor at the facility was equipped with internal floor drains which were directly connected to the sanitary sewer. From February, 1992 through July, 1992, the drain water was collected into an above ground storage tank located on the basement floor and sent directly to a 5,000 gallon tanker truck. When the tanker truck became full, it was sent for off-site disposal. From July, 1992 April, 1993, the drain water was sent to the 5,000 gallon Tanker Truck, then was combined with process waste water and then transferred to an above ground storage tank in the basement. After sampling and analysis for effluent exceedances, the waste water was combined in the basement with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer. In April, 1993 CCI replaced the 5,000 gallon Tanker Truck with a 10,000 gallon above ground S/S Storage tank.

From 1995 to the present, the drain water has been transferred to an above ground S/S storage tank for the treatment of heavy metals by chemical precipitation. After treatment, the drain water is transferred to another above ground storage tank for analysis. If the treatment has been successful, the drain water is sent directly to the 10,000 gallon Storage Tank, and mixed with the process waste water. After the tank has accumulated to its maximum capacity, the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer which flows approximately 70 yards to an interceptor of the industrial park.

- 6 (c) i) There have been no storm sewers, catch basins, or lagoons located at Building # 17, 29-75 Riverside Ave., Newark, N.J. since the beginning of operations of CCI.
 - ii) N/A
 - iii) N/A
 - iv) N/A
- 6 (d) The facility layout for the collection, storage, and disposal of waste water can be located in Attachment 6.
- 6 (e) On January 6, 1992 the Newark Fire Department and the New Jersey DEP responded to a complaint of a discharge at the CCI facility. CCI's next door neighbor had plugged up the sewer line, and when CCI'S personnel excavated the line to attempt to clear it, the contents of the line, including water colored purple with Red # 3 and Blue # 2 dye was disbursed into the excavation. This water was pumped out of the excavation onto the ground where it was observed by the Fire Department and DEP. (See Attachment 7) CCI was ordered to clean up the discharge, which was analyzed and shown to be non-hazardous. (See analysis of soil and liquid samples Attachment 8). CCI was charged with discharging to the PVSC sewer without a permit.

Subsequently, after CCI obtained a PVSC permit, it was cited by PVSC for having discharged waste water to the sewer which contained some volatile compounds and metals in excess of permitted concentrations. These discharges exceedances have been resolved, and current treatment methods appear to be keeping wastewater discharges within permitted parameters.

- 7 (a) The total amount of hazardous substances generated during the operation of the facility on an annual basis can not be determined. The hazardous substances which are contained in the waste water stream are determined by the purity of the raw materials. As a result, contaminant concentrations differ from one manufacturing batch to another.
- 7 (b) Chemical Compounds Inc. has not discharged any hazardous materials into the Passaic River.
- 8 (a) There have been no leaks, spills, explosive fires or other incidents that occurred at the CCI facility that resulted in hazardous substances being released.

- 8 (b) CCI did not discharge any hazardous material into the Passaic River. (See answer to 6(e) for description of incident.)
- 9 (a) Yes, CCI's facility is subject to flooding due to the close proximity of the Passaic River. Flooding does occur due to the overflowing of the Passaic River. As a result, the water generated due to the flooding of the Passaic River is analyzed, treated and stored at our facility before discharging to the sewer.
- 9 (b) Flooding occurs during very bad storms, the dates of each occurrence are not known.

10 (a) In 1992, due to the discharge described in 6(e), CCI paid administrative costs to the New Jersey Department of Environmental Protection for the discharge response. The NJDEPE Case # is 92-01-07-1025. In addition, CCI was charged with violating the Water Pollution Control Act for negligently discharging a pollutant into a municipal treatment works without possessing a valid industrial pretreatment permit issued by the Passaic Valley Sewerage Commission. CCI pled guilty to a fourth degree water pollution violation with a fine of \$5,000 for the offense and had to provide a check in the amount of \$1,760.85 payable to the Office of the State Environmental Prosecutor to be used to purchase a one page advertisement in the Gloucester Times conveying a positive environmental message.

CCI also paid for administrative costs when the Bureau of Emergency Response responded to a chemical fire at the facility on October 5, 1993. The case was closed. The NJDEPE Case #'s are 93-10-05-0736 & 93-10-05-1110.

On September 14, 1994, CCI had received a Notice of Violation from the Division of Facility Wide Enforcement - NJDEP. The inspection identified a violation of the Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder. Remedial actions to correct the violations were implemented by CCI within days and no further enforcement was required thereafter.

With regard to violations of discharge permit limitations, CCI resolved the matter by entering into a Consent Order and Final Judgement with the Passaic Valley Sewage Commissioner on November 24, 1994, by which it paid \$6,000 to PVSC and entered into a compliance schedule, which was subsequently extended to July 1, 1996. (See Consent Order and Final Judgement and other relevant documents - Attachment 9 & 10.)

11) For the purchasing of listed hazardous substances, such as raw materials, in item (3) or (4), the following table indicates CCI's suppliers since the beginning of operations. Documents such as invoices, bill of ladings, and a purchase order book for receiving these hazardous substances are available.

Hazardous Substance - Raw Material	Supplier's Name	Supplier's Address
Acetic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Accide Acide	Duso Chemical	173 Smith Street Poughkeepsie, N.Y. 12602
- Adipic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Aupe acid	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Ammonia	Jones Chemical	80 Munson Street LeRoy, N.Y. 14482
Benzoic Acid	Textile Chemical	990 Jersey Ave. New Brunswick, N.J. 08901
	JLM Industries	8675 Hidden River Parkway Tampa, FL 33637
Methanol	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Methylene Chloride	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
The Land	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Toluene	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Xylene	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901

For laboratory supplies, the following table provides information regarding suppliers:

Laboratory Material Name	Supplier's Name	Supplier's Address
	PCI Scientific Supply, Inc.	41 Plymouth Street
Acetic Acid	1	Fairfield, N.J. 07004
Adipic Acid		
Benzoic Acid	J.T. Baker	89 Newbury Street
Chloroform	1	Suite 103
Methylene Chloride		Danvers, MA 01923
Methanol		1
Toluene	Fisher Scientific	711 Forbes Avenue
Xylene		Pittsburgh, PA 15219-4785

For the hauling and disposal of listed substances, such as waste water, plant and laboratory solvents, in items (3) or (4), the following table indicates CCI's past and present transporters and disposal facilities. Documents, such as manifests, for the disposal of these hazardous substances are in Attachment 11.

Hazardous Substance	Transporter Name	TSD Name
Methanol, Xylene Waste Flammable Liquids	Preehold Cartage Inc.	ECOFLO 2700 Patterson St. Greensboro, NC 27407
Dye Waste Water Non-Hazardous	Chemical Waste Management	Chemical Waste Management 100 Lister Ave. Newark, NJ 07105
Methanol, Xylene Waste Flammable Liquids	Oldover Corporation	Oldover Corporation Route 1, State Road 651 Arvonia, VA 23004
Chloroform, Methylene Chloride, Xylene Laboratory Solvents Waste Flammable Liquids	Tri-State Motor Transit Co.	Rineco 1007 Vulcan Rd Haskell Benton, AR 72015
Dye Waste Water Non-Hazardous	Laidlaw Environmental Services	Laidlaw Environmental Services 3527 Whiskey Bottom Rd. Laurel, MD 20724
Dye Waste Water Non-Hazardous	Maumee Express	Rineco 1007 Vulcan Rd Haskell Benton, AR 72015
Waste Dye (HC Yellow # 2)	Pranks Vacuum Truck Service Inc.	Research Oil Company 2655 Transport Rd. Cleveland, OH 4415
Methanol, Xylene Waste Flammable Liquids	Freehold Cartage Inc.	Systech Environmental 11397 County Rd. 176 Paulding, OH 45879

12 a) & b) There has been no sampling of the soil, ground water, or surface water at the facility for purposes other than those identified in the responses above. However, an Occupational Health Survey was conducted by CCI's insurance company to evaluate employee exposure to possible various airborne contaminates. The survey included air sampling for xylene, methanol and others. As a result, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminates. Attachment 12 contains the report provided by CCI's insurance company.

13 a) Yes, CCI has owned the facility at 29-75 Riverside Ave. - Building # 17 since July 1, 1986. Attachment 1 contains a copy of the deed of sale. The property was purchased from Industrial Development Associates, Inc..

13 b) N/A

13 c) In 1888 the Freeholders of Essex County sold the property to Triton Boat Club of Newark. This transaction is recorded in Essex County Deed Book K-24, Page 133. On May 16, 1902, Patton Paint Company acquired the property from the Triton Boat Club of Newark, as recorded in Deed Book I-35, Page 270. Patton Paint Company was a manufacturer of paint and varnishes.

Thereafter, Pittsburgh Plate Glass Co. which manufactured paint and varnishes, took the subject property. The property was identified as Block 614, Lot 1. The current facility - Building # 17 - was constructed by the Pittsburgh Plate Glass Co. as a chemical resin manufacturing facility for its operation. PPG, Inc. which was formerly called Pittsburgh Plate Glass Co. purchased the property on January 31, 1941, and held the property to August 2, 1971.

In 1971, the site was sold to a developer, Riverside Ave. Properties, Inc. Deed Book 4382, Page 1023. Riverside Ave. Properties, Inc. thereafter leased the site. On October 11, 1979, the property was sold to another developer, Industrial Development Corporation, which sold the property a month later to Industrial Development Associates. The principal of Industrial Development Associates is Anthony V. Pugliese, III. Industrial Development Associates leased the building to S.B.S. Chemicals, Inc. and Desachem Co., Inc, manufacturers of chemicals and detergents. S.B.S. Chemicals and Desachem Co., Inc occupied Building # 17 pursuant to a lease agreement with Industrial Development Associates, which argument expired on August 14, 1985. Thereafter, the building was vacant and the lot and block numbers were changed and subdivided from Block 614, Lot 1 (partial) to Block 614, Lot 66. CCI has no relationship with the past owners or tenants.

- 14 (a) The legal name of the company is Chemical Compounds Inc..
- 14 (b) The president of the company is Mr. Alberto Celleri. Mr. Celleri's address is 10 Baldwin Court, Roseland, NJ 07068.
- 14 (c) Chemical Compounds Inc. is incorporated in the state of New Jersey.
- 14 (d) Attachment 13 contains a copy of the company's "Certificate of Incorporation" and amendments thereto.
- 14 (e) CCl is not a subsidiary or affiliate of another company.
- 14 (f) Chemical Compounds Inc. has no predecessor organization.
- 14 (g) Chemical Compounds Inc. has not acquired nor merged with any other company.
- 14 (h) N/A
- 14 (i) There are no previous owners of CCI.
- 15. The person answering this Request for Information is Alberto Celleri, President of CCl, 10 Baldwin Court, Roseland, New Jersey 07068 (201) 364-0370. Mr. Celleri has personal knowledge of the responses. Mr. Jim Giannotti, 72 Califon Drive, Colonia, NJ 07067, (908) 382-5591, a Chemical Engineer at CCI, assisted with the preparation of these responses.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey :

County of Essex

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

NAME (print or type)

President
TITLE (print or type)

SIGNATURE

Sworn to before me this

day of August, 1996

Notary Public

IRIS L. HERNANDEZ NOTARY PUBLIC OF NEW JERSEY MY COMMISSION EXPIRES SEPT. 6, 1999

DEED Record and return to: Industrial Development Associates Gentur. Gentur. Chemical Compounds, Inc. Grantee.

This Deed is made on

July 1

RETWEEN

INDUSTRIAL DEVELOPMENT ASSOCIATES, 141 Lanza Avenue

Garfield, New Jersey

tving its principal office at

a corporation of the state of Mew Jersey 141 Lanza Avenue, Garfield, New Jersey

referred to as the Grantor,

AND

Chemical Compounds, Inc.

hose post office address is

Barrette Circle

10 Valley Road, Stanhope, New Jersey

referred to as the Grantee.

word "Grantee" shall mean all Grantees listed above

TAILES O

The Grantor acknowledges receipt of this money.

Tax Map Reference, (N.J.S.A. 46.15-2.1) Municipality of Block No.

Newark

614 Lot No. 66

No property tax identification number is available on the date of this Deed, (Check boy d'applicable.) Property. The property consists of the land and all the buildings and structures on the land in

r. City Essex of County of

Newark and State of New Jersey. The legal description is:

Being known and described as proposed Lot "C" as faid out and described on a certain subdivision map entitle "Proposed Sabdivision Lot 1 - Block 614 Newark Tax Map" prepared by Borrie, MacDonald & Watson, dated June 25, 1984, and filed in the Essex County Register's Office on Pebruary 4, 1985 as Map No. J594. This conveyance is made subject to and along with the right of ingress and egress along, over and through the pagement area thin and conveying the tax is over and through the casement area fain out and provided for in the aforementioned subdivision map.

See Schedule A attached hereto for additional description.

Be ly li 12 AN 'Uh

RECEIVER & REGISER REGISTER DESCRIPE

666-4936 DE 214

SCHEDULE A

All those certain tract or parcel of land, and any improvements now or hereinafter constructed thereon lying and being in the County of Essex, in the City of Newark and the State of New Jersey, being further described as follows:

Being known and designated as Lot C in Block 614 as shown on Hap entitled "Map of Subdivision of Lot 1 - Block 614" filed February 4, 1985 in the Essex County Register's Office as Map Number 3594.

Being further described as follows:

BEGINNING at a point where the Northeasterly boundary line of Lot B in Block 614, as shown on the above mentioned map, intersects the United States Pierhead and Bulkhead Line along the Passaic River, and running; thence:

- Along said Pierhoad and Bulkhead Line, North 38 degrees 47 minutes 20 seconds East 82.94 feet to a point; thence:
- (2) Continuing along said Pierhead and Bulkhead Line, North 31 degrees 09 minutes 20 seconds East 25.41 feet to a point; thence:
- (3) North 51 degrees 15 minutes 40seconds West 100.00 feet to a point; thence:
- (4) North 89 degrees 43 minutes 30 seconds West 52.33 feet to a point; thence:
- (5) South 36 degrees 52 minutes 20 seconds West 79.00 feet to a point in the Northeasterly boundary line of Lot 8; thence:
- (6) Along said Northeasterly boundary line of Lot B, South 52 degrees 37 minutes 40 seconds East 141.72 feet to a point in the United States Pierhead and Bulkhead Line and the point and place of BEGINNING.

Being also known as Lot 66 in Block 614 on the Tax Hap of the City of Nevar

The conveyance of the foregoing casement for ingress and egress is made expressly subject to the Grantee's obligation to maintain same at its own cost and expense in common with all others using same and it is understood that the Grantor chall have no responsibility or obligation in that regard whatsoever.

This conveyance is made subject to the following covenant which shall be construed as a covenant running with the land binding the Grantee, its successors and assigns.

The Grantee, its successors and assigns, shall be obligated to pay the Grantor, its successors and assigns, five (5t) percent of the cost of snow removal, guard service, and exterior janitorial and maintenance service artributable to the premises owned by the Grantor of which the premises conveyed herounder formed a part. The Grantee covenants to pay any or all of the aforesaid costs within ten (10) days of the receipt of the Grantor's bill for same. In the event that the Grantee fails to pay any or all of the aforesaid costs within thirty (30) days of the receipt of Grantor's bill for same, said costs shall become a lien against these premsies which lien shall be subordinate to any mortgage lien against these premises provided that the proceeds of such mortgage have been invested into the premises described above.

The Grantce also covenants with the Grantor to join any property owner's association formed subsequent to this conveyance to administer the terms of the covenant. The Grantor represents that it shall cause any of the remaining property owned by it at 29-75 Riverside Avenue, Newark, New Jersey, of which these premises formed a part, to be charged with a similar covenant and that it shall fairly and evenly administer same as to all of the premises affected.

This conveyance is subject to easements and restrictions of record if any, zoning ordinances, state, county and municipal laws or ordinances affecting the premises and such state of facts as an accurate survey would reveal.

845340029

_{eg.4936} par 215

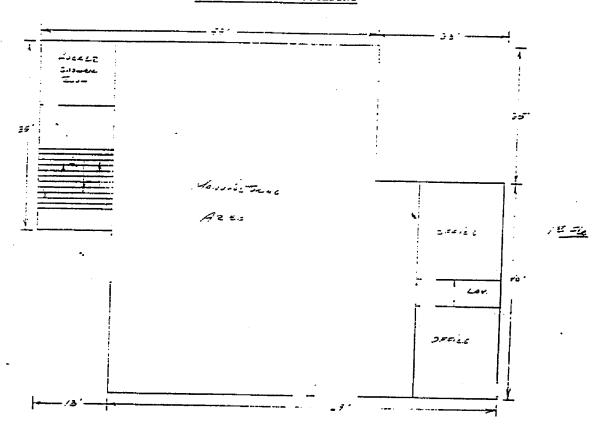
~ M

Promises by Grantor. The Grantor promises that the Grantor has done no act to encomber the property. This promise is called a "covenant as to grantor's acts" (N.J.S.A. 46.4-6). This promise means that the Grantor has not allowed anyone else to obtain any legal ciphts which affect the property (such as by making a mortgage or allowing a judgment to be entered against the Grantor).

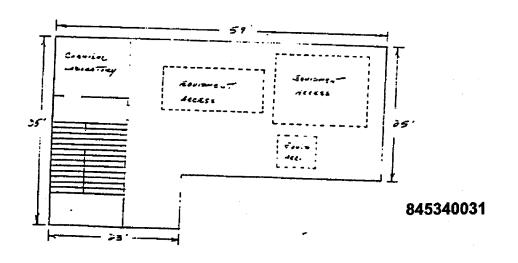
Signatures. This Deed is signed and attested to by the Granton's proper corporate officers as of the date at the top of the first page, its corporate scal is affixed.

and acree toly or me may large, us conjuntate scat	is affixed
Aucard by	HIDOSTRIAL DEVELOPMENT ASSOCIATES HY: INDUSTRIAL DEVELOPMENT CORPORATION General Parkher
Hatricia Pugliesu Secretary	Anthony V. Puglicse, Hygoden
STATE OF NEW JERSFY, COUNTY OF RESERVED TO BE STATE OF THE PROPERTY OF THE PRO	550X SS., . 1966 .
personally came before me and this person acknowle	edged under ooth, to my sanstaction, that: everany of - Industrial Development
Associates (b) this person is the attesting witness to the si Anthony V. Puglieso, III	the corporation named in this Deed; guing or this Deed by the proper corporate afficer who is the President of the corporation;
(c) this Deed was signed and defisered by the ex- resolution of its Board of Directors;	approximate as its columns act duly autorized by a proper
(d) this person knows the proper seal of the cor (c) this person signed this proof to affest to the	truth of these facts; and
(Such consideration is defined in N.J.S.A 4	be pend for the transfer of file is \$195,000. Quantum (6:15-5)
Signed and sworn to before me on fully 1 1986	
Henry Paper, an Attorney at law of the State of New Jersey	Patricia Puglidad
Prepared by:	

DIAGRAM OF THE BUILDING



7 20 -Le





CHEMICAL COMPOUNDS, INC.

Biverside Industrial Park

29-75 Riverside Avenue m Newark Bewalterson 07104 2015 isson 151-2

END - Joc 10, 1990

September 10, 1990

Southwest Photo Chem, Inc. 350 Electra Street Pomona, California 91766

Attention: John Jeleniewski

Reference: Contract dated December 20, 1983

Dear John:

Back in 1983, we entered into a Contract dated December 20, 1983 whereby you agreed to perform certain services for us. Paragraph 8 of said Agreement provided that the Contract would extend for a period of five (5) years and annually thereafter unless either party gave the other ninety (90) days notice of termination.

The purpose of this letter is to give you ninety (90) days notice of termination of our Agreement of December 20, 1983 and any subsequent amendments thereto. You are advised that the restrictive coverant contained in the Agreement and the confidential information obtained under said arrangement with us is protected in accordance with our Agreement.

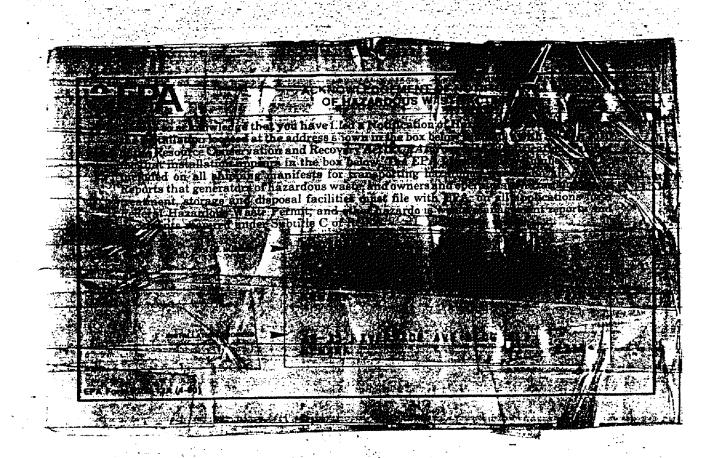
Our relationship has been a good relationship, and we appreciate the assistance you have given us in the past. Our arrangement is terminated in accordance with our Agreement and this letter.

Very truly yours,

CHEMICAL COMPOUNDS, INC.

Harold E. Sullivan

President



PASSAIC VALLEY SEWERAGE COMMISSIONERS

SEWER CONNECTION PERMIT

20407122

PERMIT#

(Please use the Permit Number on any correspondence with PVSC) In compliance with the provisions of the Federal Water Pollution Control Act, its amendments, the Clean Water Act and the Rules and Regulations of the Passaic Valley Sewerage Commissioners:
Chemical Compounds, Inc.
(herein, after referred to as the Permittee) is authorized to discharge from a facility located at
29-75 Riverside Avenue - Building #17
07104
Newark, New Jersey 07104

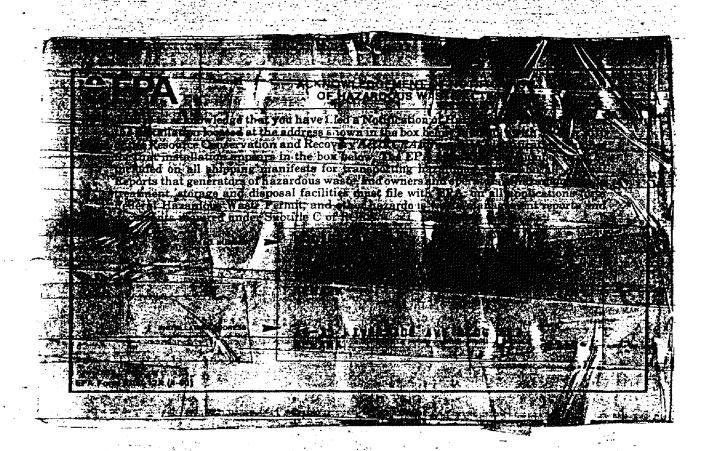
to the Passaic Valley Sewerage Commissioners Treatment Works in accordance with discharge limitations, monitoring requirements and other conditions set forth herein.

EXPIRATION DATE 07/20/97

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Rev: 02/96

EXECUTIVE DIRECTOR



PASSAIC VALLEY SEWERAGE COMMISSIONERS

SEWER CONNECTION PERMIT

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EXPIRATION DATE 07/20/97

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Rev: 02/96



CHEMICAL COMPOUNDS INC.

WASTE WATER POLLUTANTS

The following is a list of pollutants detected in each specific waste water stream. The pollutants typed in **BOLD** face are detected regulated compounds in our waste water discharge. The numbers indicated in the table (and in parenthesis) are of an average concentration analyzed inhouse or at an accredited laboratory - throughout the years.

WASTE WATER STREAM (COD Conc.)	PRIORITY POLLUTANTS							
_	Heavy	Metals	Cyanide Conc. (ppm)	Organics				
	Pb Conc. (ppm)	Zn Conc. (ppm)		VOA Conc. (ppb)	BNA Conc. (ppb)			
NDAPA COD - 450,000 ppm .	0.8	0.9	15	Methylene Chloride (38) Acetone (13,200) Chloroform (25) 1,2-Dichloroethane (130) Toluene (1650) Chlorobenzene (382) Ethylhenzene (26) Chloromethane (550) Benzene (960) o-Xylene (4150) m.p-Xylene (103)	Phenol (300) 2-Nitrophenol (450) Nitrobenzene (286) Aniline (2680) 2-Nitroaniline (800) 3-Nitroaniline (870)			
HC Blue # 2 COD - 60,000 ppm	< 0.20	1.0	2.0	Tetrachloroethylene (220) Chloroform (19)	2-Nitrophenol (650) bis (2-Chloroethyl)Ether (440)			
NHNFA COD - 42,000 ppin	< 0.20	0.3	< 0.10	Chloroform (22) Methylene Chloride (25) 1,2-Dichloroethane (1800) Toluene (41) Chlorobenzene (57) o-Xylene (32,000)	Phenol (320) 2-Nitrophenol (770) bis (2-Chloroisopropyl)Ether (7700) Nitrobenzene (73) 2-Nitroaniline (820) 3-Nitroaniline (860)			
NPD COD - 82,000 ppm	< 0.20	0.35	0.20	Below MDL	Phenol (26) 2-Nitrophenol (155) Isophorone (180) 2-Nitroaniline (300) 3-Nitroaniline (980)			

WASTE WATER STREAM (COD Conc.)	PRIORITY POLLUTANTS							
	Heavy Metals		Cyanide Conc. (ppm)	Org	ganics			
	Pb Conc. (ppm)	Zn Conc. (ppm)		VOA Conc. (ppb)	BNA Conc. (ppb)			
HC_Yellow # 2 COD - 110,000 ppm	< 0.20	0.32	< 0.02	Chlorobenzene (2810) Xylenes (49,100) 1,2-Dichlorobenzene (169)	2-Chlorophenol (496) Nitrobenzene (259) 2-Nitrophenol (3380) 2-Nitroaniline (5510)			
HC Yellow # 4 COD - 190,000 ppm	< 0.20	0.850	< 0.01	Methylene Chloride (594) 1,2-Dichloroethane (7200) Acetone (8600) Chloroform (53) Xylenes (260)	bis (2-chloroethyl) Ether (47,600) bis (2-Ethylhexyl) phthalate (107)			
DNHA	1,43	0.9	< 0.01	Below MDL	2,4-Dinitrophenol (12,100)			
HC Yellow # 5	1.43	0.8	< 0.01	1,2,4-Tricblorobenzene (44.2) 4-Chloroaniline (442)	Below MDL			
NOPD COD - 225,000 ppm	0.269	0.277	< 0.05	Below MDL	Below MDL			
HC Red#3	< 0.20	0.372	< 0.01	Methylene Chloride (32) Chloroform (41) 2-Butanone (54) Bromodichloromethane (31) Toluene (17) m,p-Xylene (35) 1,2-Dichloroethane (50)	2-Nitroaniline (100)			

**** MDL - Mean Detection Limit

ACCREDITED LABORATORIES, INC. VOLATILE ORGANIC ANALYSIS DATA

case Number	3100	MATRIX Aqueous
THPLE NUMBER	9508936	DILUTION FACTOR 10
9 FILE	>A3540	DATE EXTRACTED
JULIENT NAME	ct	DATE ANALYZED \$6/28/95
FIELD ID	- MDAPA	ANALYZED BY LARRY

Cas #	COMPOUNO	UG/L		HOL.	CAS #	COMPOUND	UG/L	_	MOL
*****	2025464###################################			*****	********				******
107028	Acrolein	U		61	78875	1,2-Dichloropropane	U	ı	4.0
107131	Acrylonitrile	ប		66	10061015	cis-1,3-Dichloropropene	ū		4.0
74873	Ch loromethane	55 0	ч	20	79016	Trichloroethene	Ū		4.0
74839	Bromomothane	300	u	20	71432	Benzene	960		4.0
75014	Vinyl Chloride	U		28	124481	Dibromochtoromethana	U		4.0
<i>7</i> 5003	Chloroethane	IJ		20	79805	1,1,2-Trichloroethane	ŭ		4.0
<i>7</i> 5092	Methylene Chloride	· U		10	10061026	trans-1,3-Dichloropropene	Ü		4.8
67641	Acetone	24000	W	18	110758	2-Chloroethylvinylether	ŭ		20
75150	Carbon Disulfide	U		4.0	<i>7</i> 5252	8rcmofgrm	Ü		4.0
75694	Trichlorofluoromethane	IJ		4.0	591 <i>7</i> 86	2-Hexanone	110		9.0
75354	1,1-Dichlorgethene	. U		4.0	109101	4-Methyl-2-pentanone	68		7.8
75343	I,1-Dichloroethane	U		4.0	127184	Tetrachioroethene	Ü		4.0
156605	trans-1,2-Dichloroethene	U		4.0	79345	1,1,2,2-Tetrachlorgethane	Ü		6.0
57663	Chloroform	31	u	4.8	100003	Totuene	1500	u	5.0
107062	1,2-Dichloroethane	Ü		4.0	108987	Chlorobenzene	68	ũ	4.0
78933	2-Butanone	1800		4.0	100414	Ethylbenzene	26	-	10
71556	1,1,1-Trichloroethene	Ų		4.8	100425	Styrene	Ü		4.0
6235	Carbon Tetrachloride	Ü		4.0	1330207	m,p-Xylene	37	¥	28
9054	Vinyl Acetate	Ü		8.0	95476	o-Xylene	250	ü	21
<i>7</i> 4	Bromodichloromethane	U		4.0		cis-1,2-Dichlorgethene	270 U	-	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichlorosthans-d4	101 %	76-114	OK
Toluene-d8	96 %	89-110	DK.
Bromofluorobenzene	97 %	. 86-115	0K

J - Indicates compound concentration found below MOL.

low MOL. B - Indicates compound found in essociated blank.

U - Indicates compound analyzed for but not detected. W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

ACCREDITED LABORATURIES, INC. THA ORGANIC ANALYSIS DATA

Case Number	3180	MATRIX	Aqueous	
Sample Number	9508936	DILUTION FACTOR	58	
OATA FILE	>81194	Date extracted	06/28/95	
IENT NAME	<u>ccı</u>	Date analyzed	07/22/95	
TETO TO	· NOAPA	ANALYZED BY	PAUL	

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MUL
108952	Pheno i	300 J	500	59507			
95578	2-Chlorophenol	U	700 500	88062	4-Chloro-3-methylphenol	U	100
95487	2-Methylphenol	U	500 500	95954	2,4,6-Trichlorophenai	U	501
108394	3&4-Methylphenol	Ü	500		2,4,5-Trichlarophenat	IJ	581
88 <i>7</i> 55	2-Nitrophenol	450 J	500	51285 10002 <i>7</i>	2,4-Dinitrophenol	U	2500
105679	•	470 J	500 500	-	4-Nitrophenol	U	2581
120832	2,4-Dimethylphenol 2,4-Dichlorophenol	U	500	534521	4,6-Dimitro-2-methylphenol	บ	2500
111444	bis(-2-Chloroethyl)Ether			8 <i>7</i> 865	Pentachloropheno!	U	2500
541 <i>7</i> 31	,	u U	500	121142	2,4-Dinitrataluene	Ų	500
	1,3-Dichterobenzene	u U	500	84662	Diethylphthalate	U	500
106467 100516	1,4-Dichlorobenzene	U	500	7005723	4-Chlorophenyi-phenylether	U	500
755U1	Benzyl Alcohol	U U	1000 500	86737	Fluorene	U	500
108601	1,2-Dichlorobenzene	Ü		100016	4-Nitroaniline	ុប	2500
621647	bis(2-Chlorossopropyl)ether	_	50 0	86306	N-Nitrosodiphenylamine	U	500
67721	N-Ni troso-Di-n-propylamine	บ น	500 500	101953	4-Bromophenyl-phenylether	U	590
98953	Hexach loroe thana	74 Jis	500	118741	Hexachlorobenzene	U	500
78591	Nitrobenzene		500 500	85018	Phenanthrene	U	500
65850	Isophorene	U	500	120127	Anthracene	U	500
	Benzoic Acid	U	2500	84742	Di-n-Butylphthalate	U	580
111911	bis(-2-Chloroethoxy)Methane	U	500	206440	Fluoranthene	U	500
.50951 503	1,2,4-Trichlorobenzene	U	500	129000	Pyrane	U	500
106478	Naphthalene 4-Chlorgeniline	U U	500	85687	Sutylbenzylphthalate	υ	500
		-	1000	91941	3,3'-Dichlorobenzidine	U	1000
97683 01674	Hexachlorobutadiene	U	500 540	56553	Benzo (a) Anthracena	U	588
91576	2-Methyl naphthalena	U	500	117017	81s(2-Ethylhexyl)Phthalate	U	500
77474	Hexachlorocyclopentadione	IJ	508	218019	Chrysene	ប	500
91587 88744	2-Chilorenaphthailene 2-Nitroaniline	800 J G	500	117840 .	Di-n-octyl phthalate	บ	500
			2500	205992	Benzo(b)fluoranthene	ປ	500
131113 208968	Disethyl Phthalate	U	500	207089	Benzo(k)Fluoranthene	U	500
	Acenaphthylene	U OZO X	500	50328	Benzo (a) Pyrene	U	500
99 19 2	3-Mitroansline	870 J	2500	193395	Indena(1,2,3-cd)Pyrene	U	500
83329	Acenaphthene	U	500	53703	Dibenzo(a,h)Anthracene	Ü	500
132649	Dibenzofuran	U	500	191242	Benza(g,h,1)Perylene	U	500
606202	2,6-Dinitrataluene	· U	500	62759	N-Mitrosodimethylamine	U	508
	SURROLATE	COMPOUNOS	REC	DVERY	LIMITS STATUS		
	Nitrobenzen	e-d5			35-114 <u>OK</u>		
	2-Fluorob spi	nenyi			43-116 <u>OK</u>		
	Terphenyl-di	14	_	89 %	33-141 <u>OK</u>		
	Pheno i -d5			42 %	10- 94 UK		

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
Nitrobenzene-d5	<u> 42</u> ×	35-114	_OK
2-Fluorobiphenyl	49 *	43-116	OK
Terphenyl-d14	<u>89</u> %	33-141	0K
Pheno i-d5	42 %	10- 94	<u>UK</u>
2-Fluorophenol	34 %	21-100	DK
2,4,6-Tribromophenal	30 %	10-123	OK.

J - Indicates compound concentration found below MDL. B - Indicates compound found in associated blank.

U - Indicates compound analyzed for but not detected. W - Result exceeds specific ground water quality criteria.*

⁻ Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993. * 3-Mathylphenol and 4-Mathylphenol can not be separated by the method applied

Expensió Medicales de Arteria de la Esperia de Arteria de Arteria de Arteria de Arteria de Arteria de Arteria

Integrated Analytical Laboratories, Inc.

273 Franklin Road Randolph., N.J. 07869

201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

HCBIUE#2

Project Name: PVSC MONITORING Lab Case Number: 10950 - 2904

MDL - METHOD DETECTION				< = LESS T	HAN THE
<u> </u>	:		OLATILES		1111
Lab ID : 2904-001	i	1	Method 624		
Client ID : 001				Date Samulad .	
	1			Date Sampled: Time Sampled:	12/26/95
Matrix/Unite: Aqueous - µg/L. Percent Moisture: 100			•	Date Analyzed:	15:00
Lescent Woltstiffe: 100	:			r pere vrostlyžed :	1/2/96
Compound	Conc. Q	MDL	Compound	Conc. Q	MDL
Chloromethane	< 10.0	10.0	Bromodichloromethane	•	MIDI
Vinyl Chloride	< 10.0	10.0	2-Chiametral IV	< 10.0	10.0
Bromomethane	< 10.0	10.0	2-Chloroethyl Vinyl Ether	< 10.0	10.0
Chloroethane	< 10.0	10.0	cis-1,3-Dichloropropene Toluene	< 10.0	10.0
Trichlorofluoromethane	< 10.0	10.0		< 10.0	10.0
1.1-Dicaloroethene	< 10.0	10.0	trans-1.3-Dichloropropene	< 10.0	10.0
Methylene Chloride	< 20.0	20.0	1.1,2-Trichloroethane	< 10.0	10.0
trans-1,2+Dichloroethene	< 10.0	10.0	Tetrachloroethene	< 10.0	10.0
1,1-Dichloroethane	< 10.0	10.0	Dibromochloromethane	< 10.0	10.0
Chlaroform	18.8	10.0	Chlorobenzene	< 10.0	10.0
I.I.I-Trichloroethage	< 10.0	IO.0	Ethylbenzene	< 10.0	10.0
Carbon Tetrachloride	< 10.0	10.0	Total Xylenes	< 10.0	10.0
.2-Dichloroethane	< 10.0	10.0	Bromoform	< 10.0	10.0
Jenzione .	< 10.0	10.0	1,1,2,2-Tetrachloroethane	< 10.0	10.0
richloroethene	< 10.0	10.0	1,3-Dichlorobenzene	< 10.0	10.0
2-Dichloropropane	< 10.0		1,4-Dichlorobenzone	< 10.0	10.0
	1. 10.0	10.0	1,2-Dichlorobenzene	< 10.0	0.01
; ;	<u> </u>		L CYANIDE		
ab ED : 2904-001		Met	hod 335.2		
lient ID : 001	i :			Date Sampled: 12	Mene
latrax/Units : Aqueous - mg/L	!· !-			Time Sampled: 15	1.00 1.00
recent Moisture: 100		\ .		Date Analyzed: 1/	TUU Nor
Anna Moterate: 100	V	}			6/90
	Result		MDL		
	1.00	7	0.05	442	

All NIDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Laboratory Director

The liability of Integrated Analytical Eaboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Labs 14751



Lab ID 2903-01

Integrated Analytical Laboratories, Inc.

273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101

HUBLIETZ

Project Name: PVSC - MONITORING Lab Case Number: 10950 - 2903

The same of the sa			
MDL =	METHOL	DEFECT	ION LIMIT

< - LESS THAN THE MOL

SEMIVOLATILES - BASE NEUTRALS

Method 625

Client ID . 601					Date Sampled:	12/26/95
Client ID: 001					Time Sampled:	15:00
Matrix/Units: Aqueous - µg/L					Date Analyzed:	1/11/96
Percent Moisture: 100				*	,,	1/11/90
Compound	Conc.	Q	MDL	Compound	Conc. () MDL
N-Nitrosodimethylamine	< 100		100	Diethylphthalate		-
Aniline (< 100		100	Fluorene	< 100	100
bis(2-Chloroethyl)ether	< 100		100	4-Chlorophenyl-phenylether	< 100	100
3-Dichlorobenzene	< 100		100	4-Nitroaniline	< 100	100
-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100	100
zeuzył alcohol	< 100		100	1.2-Diphenylhydrazine/Azobenza	< 100	. 100
1.2-Dichtorobenzene	< 100		100	4-Bromophenyl-phenylether		100
bis(2-chloroisopropyl)ether	< 100		100	Hexachiorobenzene	< 100	100
N-Nitroso-di-n-propylamine	< 100		100	Phenanthrene	< 100	100
Hexachidroethane	< 100		100	Anthracene	< 100	100
Nitrobenzene	< 100		100	Carbazole	< 100	100
Isophorone	< 100		100	Di-n-butylphthalate	< 100	100
bis(2-Chloroethoxy)methane	< 100		100	Fluoranthene	< 100	100
1,2,4-Trichlorobenzone	< 100		100	Benzidine	< 100	100
Naphthalene	< 100		100	Pyrene	< 100	100
4 Chlorospiline	< 100		100		< 100	100
Hexachlorobutadiene	< 100		100	3,3 -Dimethylbenzidine	< 100	100
2-Methylmaplithalene	< 100		100	Butylbenzylphthalate	< 100	100
Hexachlorocyclopentadiene	< 100		100	3,3*-Dichlorobenzidine	< 100	100
2-Chloronaphthaione	< 100		100	Benzo[a]anthracene	< 100	100
2-Nitroeniline	< 100		100	Chrysege	< 100	100
Dimethylphthalate	< 100			bis(2-Ethylhexyl)phthalate	< 100	100
2,6-Dinitrotoluene	< 100		100	Di-n-octylphthalate	< 100	100
Acensphthylene	< 100		100	Benzo[b]fluoranthens	< 100	100
3-Nitroenilina	< 100		100	Beazo(k)fluorauthene	< 100	100
Accemphilipene	< 100 < 100		100	Benzo[a]pyrene	< 100	100
2,4-Dinitrotolisene			100	Indeno[1,2,3-od]pyrene	< 100	100
Dibenzoftran	< 100		100	Dibenz(s,h)anthracene	< 100	100
Diodrania i	< 100		100	Benzo(g,h,i]perylene	< 100	100

- Qualifier.

845340045

New Jorsey Cartified Lab# 14751



273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for Chemical Compounds, Inc.

Demical Compounds, Inc 29-75 Riverside Ave. Newark, NJ 07181 He BING #2

Project Name: PVSC - MONITORING Lab Case Number: 10950 - 2903

MDL - METHOD DETECTION				< = LESS Τ	IAN THE N
•	S	EMIVOLATILES -	ACIOS		***************************************
lab ID = 2903-01		Method 625			
lient ID: 001				Date Sampled :	12/26/99
Matrix/Vaits: Aqueous - µg/L				Time Sampled :	15:00
ercent Moisture: 100	• .		_	Date Analyzed :	1/11/96
ompound	Result Q		MDL.		
henoi	- 100				
Chlorophenoi	< 100		100	•	
-Methy phenol	< 100		100		
Methy phenoi	< 100		100		
Vitrophenoi	< 100		100		
4-Dimethylphenol	< 100	1	100		
enzoic acid	20400	<i>2</i>	100		
4-Dichlorophenoi	< 100		0001		
Chloro 3-methylphenol	< 100		100		
4.6-Trichlorophenol	< 100		100		
4.5-Trichlorophenol	< 100 < 100	•	100		
- Dinitrophenol	< 100		100 -		
Vitrophenoi	:< 100 :< 100		100		
Dinitro-2-methylphenol	< 100		100		
ntachiorophenol	< 100		100		
	< 100	<u>.</u>	100		
•		METALS			
TD - 2000 in -		EPA Series 200			
D: 2903-01 est ID: 002	:			Data Samuel d	
	3			Date Sampled :	12/26/95
trix/Unite: Aqueous - mg/L cent Moisture: 100	٠,			Time Sampled : Date Analyzed :	15:00
Annual IO	:			ABBLYZEG :	1/11/96
npound	Result Q				
			MDL		
d e	< 0.04		0.04		
1	0.22		0.02	•	
Qualifier					
			· — — — —		

845340046

New Jersey Cestified Lab# 1475

ntegrated palytical Lebs

Integrated Analytical Laboratories, Inc.

273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5288

fe Blue #2

ANALYTICAL DATA REPORT

for

Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: PVSC - MONITORING Lab Case Number: 10950 - 2903

i	1	***************************************		< = LESS TH	AN THE N
ab ID : 2903-01	· :	GENERA	L ANALYTICAL	•	•
lient ID : 001	:			Date Sampled:	12/26/9
fatriz/Units : Aqueous - mg/L	:			Time Sampled:	15:00
ercent Moiisture: 100				e ^k	
ompound (Method)	Result	Q	MDL	Date Analyze	ત
iochemical Oxygen Demand (405.1) rtsl Suspended Solids (160.2)	18600		NA	1/2/96	•
Supressed Solids (180.2)	< 10.0		10.0	1/3/96	

O = Outliffer

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Aichael H. Leftin, Ph.D. Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

845340047

New York Certified Lab # 114

New Jersey Certified Labs 1475:

ACCREDITED LABORATORIES, INC. VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER	2616	MATRIXAqu	leous
SAMPLE NUMBER	9506616	DILUTION FACTOR1.0	<u> </u>
DATA FILE	>09873	DATE EXTRACTED	
CLIENT NAME	cc1	DATE ANALYZED05/	24/95
FIELD ID	MMFA	ANALYZED BY LAR	RY

*******				*****		38 TEKACA3 291	
CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MOL
3822222		**********	*****	********		****	******
107028	Acrolein	U	6.1	78875	1,2-Dichtoropropane	u	.4
107131	Acrylonitrile	u	6.6	10061015	cis-1,3-Dichlaropropene	U	.4
74873	Chloromethane	U	2.0	79016	Trichloroethene	U	.4
74839	Bromomethane	U	2.0	71432	Senzene	Ū	.4
75014	Vinyl Chiloride	U	2.0	124481	Dibromochioromethane	Ū	.4
75003	Chloroethane	Ŭ	2.0	79005	1,1,2-Trichloroethane	Ū	.4
75092	Hethylene Chloride	Ü	1.0	10061026	trans-1,3-Dichloropropene	Ū	.4
67641	Acetone -	Ü	1.8	110758	2-Chloroethylvinylether	U	2.0
<i>7</i> 5150	Carbon Disulfide	U	.4	75252	Sromoform	Ú	.4
75694	Trichlorofluoromethane	U	.4	5917 8 6	2-Rexanone	U	.9
75354	1,1-Dichloroethene	Ų	.4	108101	4-Kethyl -2-pentanone	U	.7
75343	1,1-Dichloroethane	U	.4	127184	Tetrachloroethene	U	.4
156605	trans-1,2-Dichloroethene	U	.4	79345	1,1,2,2-Tetrachloroethane	U	.6
67663	Chloroform	2.1	.4	108883	Toluene	U	.5
107062	1,2-Dichlorosthane	u	.4	108907	Chlorobenzene	U	.4
78933	2-Butanone	Ü	.4	100414	Ethylbenzene	v	1.0
71556	1,1,1-Trichloroethane	บ	.4	100425	Styrene	Ü	.4
56235	Carbon Tetrachloride	U	.4	1330207	m,p-Xylene	ū	2.8
108054	Vinyl Acetate	U	.8	95476	o-Xylene	.8	2.1
75274	Bromodichioromethane	뷥	.4	156592	cis-1.2-Dichloroethene	41	,

SURROGATE COMPOUNDS	RECOVERY	LINITS	STATUS
1,2-Dichloroethane-d4	102 %	76-114	OK
Toluene-dB	101 X	88-110	OK
Bromofluorobenzene	101 %	86-115	OK

J - Indicates compound concentration found below MDL.

U - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.

W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

ALCREDITED LABORATORIES, INC. BNA URGANIC AMALYSIS DATA

UASE NUMBER	2616
SAMPLE NUMBER	45116616
AIA FILE	>F1694
CLIENT NAME	CCI
FIELD ID	HHFA

MAIRIX	Aqueaus
DILUTION FACTOR	9
DATE EXTRACTED	05/15/95
DATE ANALYZED	05/25/45
ANALYZED BY	PAUL

CAS #	COMPOUNO	US/L	MOL	CAS #	CGPOUNO	WZL	TUL
108952	Phenol	U	5-U	95954	2,4,5-Trichiorophenoi	""""""""""""""""""""""""""""""""""""""	259 259
955 <i>7</i> 8	2-Chlorophenol	U	50	51289	2,4-Dinitrophenol	Ü	250
45487	2-Methylphenol	u	50	100027	4-Nitrophenol	ij	250
108394	364-Methylphenol	U	58	534521	4,5-Dinitro-2-methylahenol	IJ	254
S3755	2-Nitronhenol	áÚĜ	うり	87865	Pentachioropheno!	;]	25.0
105679	2,4-0; me thy toherol	ป	50	121142	2,4-Dinitrotaluene	ij	មព្
129832	2,4-Bichloropheno!	· U	50	84662	Disthylphthalate	ÿ	4.
111444	bis(-2-Chloroethyl)Ether	ប	50	2005723	4-Chiorophenul-phenylather	:3	9 49
541231	1,3-0ich foröbenzene	9	58	86737	Fluorene	'}	· .
195467	1,4-Otchlorsbenzene	9	90	100016	4-Nitroaniline	į.	759
190916	zenzył Alcohol	ដ	50	86596	(HN:trosod:phenylamine		2.0
44901	1.2-Dichiorobenzene	¥	£3	101953	4-Onomobenyl-otenylether	2	¥.q
198691	oisk2-Uhlangiaopropyilerner	77 W	*]	1152-1	Havach ใจกรระกอะก็อ	2	
5218-4	M-Mithaso-Gi-n-phapy (amine	3	5.3	25712	Phananthress	IJ	÷ंग
:7721	mexach: proethage	ü	កូដូ	120127	Anthracene	9	41
-4465	Nitrobenzene	J	59	84742	Or-n-Butylphthalate		- 4
35.91	Isophorone	1	5 U	286440	Fluoranthene	ij.	4.
:4858	Benzoic Acid	ប	250	129000	Pyrene	1	* 9
111911	bis(-2-Chloroethoxy)Methane	ប	50	89687	Sutylbenzviphthalata	•	A**
.29821	1,2,4-Inichieretenzene	ti	50	91941	J,J'-Gishloraberzidie∈	9	177
-1103	Naphthalene	U	50	95993	Senzala Shithracana	:	- ;
$1.3e \pm 3$	4-Chloroen:line	IJ	99	117817	Bist2-Ethythexyl Whithelate	9	- 3
3768₹	Hexach Lonobutaditene	U	50	218019	Chrysene	Ü	÷.
15.6	Z-Methylmaphthalene	U	58	117849	Di-n-octyl phthalate	IJ	: 4
77474	Hexachierocyclopentadiene	Ų	50	295992	Benza(b : Fluoranthene	:1	÷s
9198Z	2-Chloronaphthaiene	ប	58	207989	Senza(k)Fluoranthene	ij	Sij
38744	2-Nitroaniline	ij	259	59329	Benzola /Pyrane	ij	50
DIRE	Dimethyl Phihalate	J	90	193395	Indenovi.2.3-od Porene	IJ	- 11
298968	Acenaphthysene	Ü	วับ	53793	Dibanzola,h/Anthracere	j	nj
991192	5-Nitroaniline	ប	250	191242	Senzo(g,h.i)Perviene	ij	50
23329	Acenaphthene	IJ	50	62759	N-Witroscolmethylamine	Ü	۶ű
1.2649	Dibenzofuren	i)	50	237329	2,4-Dinitrochioropenzene	ij	2560
606202	2,6-Dinitrotoluene	- 0	58	229715	2,5-Dinitrophenol	ü	2500
79587	4-Chioro-3-methylphenol	u	50	38891	2,4,6-Trinitrophenoi	ij	2500
98962	2,4,6-Trichlorophenol	ij	50			=	

SURFOGRAGE CUMPULARIS	AF CONFAX	Limits	មួរគួរប្រវ
Ni tirobenzene-ob	<u></u>	35-114	: 18
2-Fluorebiphenyl	<u>/0</u> %	45-116	.1K
Terphenyl-d14	682 %	33-141	דטט
Pheno I-d5	<u>43</u> %	18- 94	<u>u</u> x
2-Fluorophenol	31 *	21-100	ÜK
2 A.A-(ribrosopheno)	16 X	18-193	OK.

Incicates compound concentration found below NUL.
 Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.
W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

^{4* 5-}Methylphenol and 4-Methylphenol can not be separated by the method applied

INDUSTRIAL CORROSION MANAGEMENT, Inc.

1152 Route 10

Randolph, NJ 07869

201-584-0330 TOBER 11, 1995 Certified for: NJ, PA, DE, CT, NY(DOH)

NJ #14116 NY #11376 US EPA CLP Lab

ANALYTICAL DATA REPORT PACKAGE

Client:

CHEMICAL COMPOUNDS, INC.

Sample Source:

Waste water

Sampled By:

Customer

LAB

DATE &

AT LAB

SAMPLE ID:

MATRIX

NUMBER

TIME COLLECTED

DATE

NPD ML's

Aqueous

220698 09/21/95 08:30 09/22/95

Supervisor/Manager Signature:

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Page # 2

INDUSTRIAL CORROSION MANAGEMENT, INC. 1152 Route 10

the electric engine of requirement for an electric experience.

Randolph, NJ 07869 201-584-0330

OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH) NJ #14116 NY #11376 US EPA CLP Lab

PRIORITY POLLUTANT ACID FRACTION ANALYSIS BY GC/MS

Lac Number: Client:

220698 CHEMICAL COMPOUNDS, INC.

Data File: >I7063

Sample source: Waste water Sample ID: NPD ML's Sample date: 09/21/95 Sampled by: Customer At lab date: 09/22/95

Extracted Date: Analysis Date:

09/26/95 09/26/95

Column: 30m SPB-5 Dilution Factor: 10

Matrix:

WATER

Init Sample vol= 50ml

Final volume= 10ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume)*Final Volume)*1000

Parameter	Result ug/l	Method Blank ug/l	Minimum Detection Limit ug/l
2-Chlorophenol 2-Nitrophenol 2-Nitrophenol 2-A-Dimethylphenol 2-A-Dimethylphenol 2-A-Dichlorophenol 2-A-Cirichlorophenol 2-A-Dinitrophenol 1-A-Dinitro-2-methylphenol 1-Nitrophenol	0 0 0 0 0 0 0 0 0 0	ב ה ה ה ה ה ה ה ה ה ה ה ה ה ה ה ה ה ה ה	200 200 360 200 200 200 200 720 200
1-Chloro-3-methylphenol	Ü	ū	200 200

` ug/l = micrograms/liter or ppb

J: Indicates a compound was analyzed for but not detected at the MDL.

J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.

B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.

ND: Not Determined.

sample. It indic ND: Not Determined.

IND: Indeterminable

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10

INDUSTRIAL CORROSION MANAGEMENT, INC.

1152 Route 10 Randolph, NJ 07869 201-584-0330 OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH) NJ #14116 NY #11376 US EPA CLP Lab

Client: 220698 Client: CHEMICAL COMPOUNDS, INC. Sample source: Waste water Sample ID: NPD ML's Sample date: 09/21/95 Sampled by: PRIORITY POLLUTANT BASE/NEUTRAL ANALYSIS BY GC/MS

Data File: >17063

Extracted Date:

09/26/95 09/26/95

Column: 30m SPB-5

Sampled by: At lab date:

Analysis Date:

Dilution Factor: 10

Matrix:

09/22/95 WATER

Init Sample vol= 50ml

Final volume= 10ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume)*Final Volume)*1000

Parameter	Result ug/l	Method Blank ug/l		Minimum Detection Limit ug/l
N-Nitrosodimethylam <u>i</u> ne	ט	Ü		200
bis(2-Chloroethyl)ether	ប	σ		200
1,3-Dichlorobenzene	U	ซ		480
1,4-Dichlorobenzene	U	Ü		460
1,2-Dichlorobenzene	ប	ט		480
bis(2-Chloroisopropyl)ether	ប	ט		240
N-Nitroso-di-n-propylamine	ŭ	Ü	r.	360
Hexachloroethane	ប	U		580
Nitrobenzene	ā	Ū		200
Isophorone	ប	ប ប ប		200
bis(2-Chloroethoxy) methane	ט	ซ		200
1,2,4-Trichlorobenzene	U	σ		460
Naphthalene	ט	U		400
**exachlorobutadiene	ប	U		200
achlorocyclopentadiene	U	Ū		300
. iloronaphthalene	U	Ü		400
Dimethyl phthalate	ש	Ü		920
Acenaphthylene	Ü	Ū		300
2,6-Dinitrotoluene	<u> </u>	Ŭ		200
Acenaphthene	Ū	Ū		380
2,4-Dinitrotoluene	U	Ū		200
Diethyl phthalate	Ū	Ū		460
4-Chlorophenyl phenyl ether	Ū	Ŭ		400
Fluorene	ប័	· Ŭ		340
N-Nitrosodiphenylamine	Ū	ŭ		200
1,2-Diphenylhydrazine (Azobenzene)	Ŭ	Ū		200
4-Bromophenyl phenyl ether	Ŭ	Ŭ		380
Hexachlorobenzene	Ŭ	Ŭ		380
Phenanthrene	Ū	Ū		180
Anthracene	Ū	Ū		160
Di-n-butylphthalate	Ď	Ŭ		500
Fluoranthene	Ū	Ŭ		120
Penzidina	Ū	Ŭ		200
Pyrene	Ŭ	Ŭ		100
Butyl benzylphthalate	Ŭ	Ŭ		240
_3,3'-Dichlorobenzidine	ŭ	ប័		200
Benzo (a) anthracene	Ŭ	ŭ		100
Chrysene	ŭ	ŭ		100
"bis(2-Ethylhexyl)phthalate	ŭ	ŭ		600
Di-n-octylphthalate	ŭ	ŭ		200
■Benzo(b) fluoranthene	ŭ	ğ		
Denzo (D) II doranchene	U	v		140

ug/l = micrograms/liter or ppb

U: Indicates a compound was analyzed for but not detected at the MDL.

J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.

B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.

ND: Not Determined.

sample. It indic ND: Not Determined. IND: Indeterminable

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11

INDUSTRIAL CORROSION MANAGEMENT, INC.

1152 Route 10 Randolph, NJ 07869 201-584-0330 OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH) NJ #14116 NY #11376 US EPA CLP Lab

PRIORITY POLLUTANT BASE/NEUTRAL ANALYSIS BY GC/MS (Continued)

Additional Base/Neutral Targeted Compounds

Lab Number: Client:

220698

CHEMICAL COMPOUNDS, INC.

Data File: >17063

Sample source: Waste water Sample ID: NPD ML's

والمعاطرة والمراجع والمتحارة والمعاطرة والإرجاع والمراجع والميثي

09/21/95

Extracted Date:

09/26/95 09/26/95

Column: 30m SPB-5

Sample date: Sampled by: At lab date:

Customer 09/22/95 Analysis Date:

Dilution Factor: 10

Matrix: WATER

Init Sample vol= 50ml Final volume= 10ml Conc. in Sample = ((Conc. on Quant Report/Initial Volume) *Final Volume) *1000

Minimum Method Detection Result Blank Limit Parameter ug/1ug/1 ug/l Benzo(k) fluoranthene U 140 Benzo (a) pyrene Indeno (1,2,3-cd) pyrene Dibenz (a, h) anthracene U U 100 U 220 U U 100 Benzo(g, h, i) perylene U U 100

ug/l = micrograms/liter or ppb

U: Indicates a compound was analyzed for but not detected at the MDL.
J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.
B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.
ND: Not Determined.
ND: Indetermined.

IND: Indeterminable

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Integrated Analytical Laboratories, Inc.

273 Frenklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: INTERNAL MONITORING
Lab Case Number: 18959 - 2640

MDL = METHOD DETECTION I.	IMIT			< - LESS 1	HAN THE M
		(v	OLATILES		
Lab 1D: 2640-01~		\		Date Sampled:	11/17/95
Client ID: 001	_			Time Sampled:	11:30
Matrix/Units: Aqueous - µg/L				Date Analyzed:	11/28/95
Percent Moisture: 100			•	,	
Compound	Conc.	MDI	Compound	Conc.	MDL.
Chloromethane	< 50	50	Bromodichloromethans	< 50	50
Vinyl chloride	< 50	. 50	2-Chloroethylvinyl ether	< 50	So
Bromomethene	< 50	50	cis-1,3-Dichloropropens	< 50	50
Chloroethane	< 50	50	Toluene	< 50	SO
Trichloroftuoromethane	< 50	50	trans-1,3-Dichloropropune	< 50	50
1,1-Dichloroethene	< 50	50	1,1,2-Trichloroethage	< 50	50
Methylene chloride	< 100	100	Tetrachloroetheas	< 50	50
trans-1,2-Dichloroethene	< 50	50	Dibromochioromethane	< 50	50
1,1-Dichloroethane	< 50	50	Chlorobenzene *	2810	50
Chloroform	< 50	50	Ethylbonzone	< 50	50
1,1,1-Trichloroethane	< 50	50	Xylenes, total	*49100	2000
Carbon tetrachlonide	< 50	50	Bromoform	< 50	50
1,2-Dichloroethans	< 50	50	1,1,2,2-Tetrachioroethane	< 50	50
Benzene	< 50	50	1,3-Dichlorobenzane	< 50	50
Trichloroethens	< 50	50	1,4-Dichlorobenzene	< 50	50
1,2-Dichloropropens	< 50	50	1.2-Dichlorobenzene	169	50

^{*}Result from diluted Sample Analysis.

Continued on next page.

YELLOW #2 "PURE"

845340054

Now York Certified Lab # 11402

New Jersey Certified Labs 14751



273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fex: 201 989-5288

ANALYTICAL DATA REPORT

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 97101

Project Name: INTERNAL MONITORING Lab Case Number: 10950 - 2640

MDL = METHOD DETECTION LIN	/II		< - LESS TH	AN THE MI
	(S	EMIVOLATILES (BNA)		
Lab ID: 2640-01 -			Date Sampled: 1	1/17/95
Client ID: 001			Time Sampled : 1	
Matrix/Units: Aqueous - µg/L			Date Analyzed: 1	
Percent Moisture: 100				
Compound	Conc.	MDL Compound	Conc.	MDL
3-Nitrosniline	< 100	100 Carbazole	< 100	100
Acenaphthene '	< 100	100 Di-n-butylphthatate	< 100	100
2,4-Dinitrophonol	< 100	100 Fluoranthese	< 100	100
4-Nitrophesol	< 100	100 Benzidine	< 100	100
2,4-Dinitrotolucae	< 100	100 Pyrene	< 100	100
Dibenzofuran	< 100	100 3,3'-Dimethylbenzidine	< 100	100
Diethylphthelate	< 100	100 Butylbenzylphthelate	< 100	100
Fluorene	< 100	100 3,3'-Dichlorobenzidine	< 100	100
4-Chlorophenyl-phonylether	< 100	100 Benzo[s]anthracene	< 100	100
4-Nitromilias	< 100	100 Chrysene	< 100	100
4,6-Dinitro-2-methylphenol	< 100	100 bis(2-Ethylhexyl)phthalate	< 100	100
N-Nitrosodiphenylamine	< 100	100 Di-n-octylphthelete	< 100	100
1,2-Diphenythydrazine/Azobenzene	< 100	100 Benzo(b)fluoranthene	< 100	100
4-Bromophenyl-phenylether	< 100	100 Beazo(k)fluoranthene	< 100	100
Hexachiorobenzene	< 100	100 Велдо[а]ругене	< 100	100
Pentachlorophenol	< 100	100 Indeno[1,2,3-cd]pyrene	< 100	100
Phonanthrone	< 100	100 Dibenz(a, h)anthracens	< 100	100
Anthracese	< 100	100 Benzolg,h,i]perylene	< 100	100

845340055

New Jersey Certified Lab# 14751



273 Franklin Road Randolph, N.J. 07889

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ANALYTICAL DATA REPORT

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 97101

Project Name: INTERNAL MONITORING Lab Case Number: 10950 - 2640

MDL - METHOD DETECTION LIN	MIT		< - LESS TH	AN THE MOL
	(s	EMIVOLATILES (BNA)		
Lab ID: 2640-01 "	_		Date Sampled : 1	1/17/95
Client ID: 001			Time Sampled : 1	1:30
Matrix/Units: Aqueous - µg/L			Dete Analyzed : 1	
Percent Moisture: 100			•	
Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 100	100 bis(2-Chloroethoxy)methane	< 100	100
Phonol	< 100	100 Benzoic scid	< 500	500
Aziline	< 100	100 2,4-Dimethylaniline	< 100	100
bis(2-Chloroethyl)ether	< 100	100 2,4-Dichlorophenol	< 100	100
2-Calorophenol	496	100 1,2,4-Trichlorobenzene	< 100	100
1,3-Dichlorobenzene	< 100	100 Naphthalens	< 100	100
1,4-Dichlorobenzene	< 100	100 4-Chlorospiline	< 100	100
Benzyl sicohol	< 100	100 Hexachlorobutadiene	< 100	100
1,2-Dichlorobeazone	< 100	100 4-Chloro-3-mathylphenol	< 100	100
2-Methylphenol	< 100	100 2-Methylnaphthalone	< 100	100
bis(2-chloroisopropyl)ether	< 100	100 Hexachlorocyclopentadiene	< 100	100
4-Methylphenol	< 100	100 2,4.6-Tricklorophenol	< 100	100
N-Nitroso-di-n-propylamine	< 100	100 2,4,5-Tricklorophenol	< 100	100
2-Aminotoluene +4-Aminotoluene	< 100	100 2-Chloropaphthalese	< 100	100
Hexachloroethans	< 100	100 2-Nitroeniline	5510	100
Nitrobenzene	259	100 Dimethylphthalate	< 100	100
[sophorone	< 100	100 2,6-Dinitrotoluene	< 100	100
2-Nitrophenol	3380	100 Accomphthylene	< 100	100
2,4-Dimethylphenol	< 100	100	1,20	

Continued on next page.

845340056

New Jersey Certified Lab# 14751



273 Franklin Road Randolph, N.J. 07869

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YELLOW #4

ANALYTICAL DATA REPORT

for

ical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: PVSC MONITORING Lab Case Number: 10950 - 2639

MDL = METHOD DETECTION	LIMIT			< = LESS T	HAN THE ME
Lab ID : 2639-001_ Client ID : 001 Matrix/Units : Aqueous - µg/L Percent Moieture: 100				Date Sampled : Time Sampled : Date Analyzed :	11:30
Compound	Conc. Q	MDL	Compound	e Conc. Q	MDL
Chloromethese	< 50	50	Bromodichloromethane	< 50	50
Vinyl Chloride	< 50	50	2-Chloroethyl Vinyl Ether	< 50	50
Bromomethese	< 50	50	cis-1,3-Dichloropropess	< 50	50
Chlorosthens	< 50	50	Toluens	< 50	50
Tricklorofluoromethene	< 50	50	trans-1,3-Dichloropropone	< 50	50
1,1-Dichlorosthess	< 50	50	1,1,2-Trichloroethene	< 50	50
Methylene Chloride	< 100	100	Tetrachioroethene	< 50	50
rans-1,2-Dickloroethens	< 50	50	Dibromochloromethane	< 50	50
1,1-Dichloroethene	< 50 ૄ	50	Chlorobenzene	< 50	50
Chloroform	53.1	50	Ethylbenzene	< 50	50
l,1,1-Trichloroethane	< 50 111	50	Total Xylenes	260	50
Carbon Tetrachioride	< 50	50	Brococform	< 50	50
1,2-Dichloroethess -	7200°	200	1,1,2,2-Tetrachloroethane	< 50	50
Sen Stor	< 50	50	1.3-Dichlorobenzene	< 50	50
Frichlorosthens	< 50	50	1,4-Dichlorobenzene	< 50	50
1,2-Dichloropropage	< 50	50	1,2-Dichlorobenzane	< 50	50

TOTAL CYANIDE Method 335.2

Lab ID: 2639-001 Client ID: 001

Metrix/Units: Aqueous - mg/L

Percent Moistare: 100

MDL

< 0.05

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Laboratory Director

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New York Certified Lab # 11402

Date Sampled: 11/17/95

Time Sempled: 11:30

Date Analyzed: 11/28/95



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ANALYTICAL DATA REPORT

Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 97191

He Yenow * 4

Project Name: PVSC - MONITORING Lab Case Number : 10950 - 2638

MDL 100 100 100 100 100 100 100 100 100 10	Date Sampled: Time Sampled: Date Analyzed:	11/17/95 11:30 11/28/95
100 100 100 100 100 100 500 100 100	Time Sampled; Date Analyzed:	11:30
100 100 100 100 100 100 500 100 100		
100 100 100 100 100 100 500 100 100		·
100 100 100		
ALS		
ies 200		
	Date Sampled : Time Sampled : Date Analyzed :	11/17/95 11:30 11/22/95
Mine		
0.04		
	100 100 MLS les 200	100 100 ALS ier 200 Date Sampled: Time Sampled: Date Analyzed: MDL 0.04

All NJDEP protocol were followed during analyses. These data have been reviewed and accepta

Michael H. Leftin, Fix D. Laboratory Direct

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New Jersey Certified Labs 14751

New York Certified Lab # 11402



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ANALYTICAL DATA REPORT

for Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101

He therow # 4

Project Name: PVSC - MONITORING Lab Case Number: 10950 - 2638

			CHEN	MINOR : 14754 - 2636			
MDL = METHOD DETECTION	TIMIT				< = LESS	HA	N THE MOL
	S	MIV	OLATII.	JES - BASE NEUTRALS			
•				lethod 625			
Lab II) : 2638-001					Date Sampled :		11/17/95
Client ID: 001					Time Sampled :		11:30
Matrix/Units : Aqueous - µg/L.					Date Analyzed :		11/28/95
Percent Moisture: 100	•						14/20/73
Compound	Conc.	Q	MDL	Compound	Conc.	Q	MDL
N-Nitrosodimethy lemine	< 100		100	Diethylphthalate	< 100		100
Aniline	< 100		100	Fluorene	< 100		100
bis(2-Chloroethyl)ether 🦎	*47600		400	4-Chlorophenyl-phenylether	< 100		100
1.3-Dichlorobeazene	< 100		· 100	4-Nitrosniline	< 100		100
1,4-Dichlorobenzene	< 100		100	N-Nitrosodiphonylamine	< 100		100
Benzyl alcohol	< 100		100	1,2-Diphenylhydrazine/Azobenzer	ne < 100		100
1,2-Dichlorobenzene	< 100		100	4-Bromophenyl-phenylether	< 100		100
bis(2-chloroisopropyl)ether	< 100		100	Hexachlorobenzene	< 100		100
N-Nitroso-di-a-propylamine	< 100		100	Phenanthrens	< 100		100
Hexachloroethane	< 100		100	Anthracene	< 100		100
Nitrobenzene	< 100		100	Carbazole	< 100		100
Isophorone	< 100		100	Di-n-butylphthaiate	< 100		100
bis(2-Chloroethoxy)methane	< 109		100	Fluorenthene	< 100		100
1,2,4-Trichlorobenzene	< 100		100	Benzidine -	< 100		100
Naphthalene	< 100		100	Pyrene	< 100		100
4-Chlorospiline	< 100		100	3,3'-Dimethylbenzidine	< 100		100
Hexachlorobutadiene	< 100		100	Butylbenzylphthelate	< 100		100
2-Methylnaphthalone	< 100		100	3,3 - Dichlorobenzidine	< 100		100
Hexachlorocyclopentadiene	< 100		100	Benzo(a)anthraceus	< 100		100
2-Chloronsphthalene	< 100		100	Chrysens	< 100		001
2-Nitrosnilies	< 100		100	bis(2-Ethylhexyl)phthalate	107		100
Dimethylphthelete	< 100		100	Di-n-octylphtheless	< 100		100
2,6-Dinitrotolucus	< 100		100	Benzo(b)fluoranthene	< 100		100
Acenephthylene	< 100		100	Benzo[k]fluoranthene	< 100		100
3-Nitroeniline	< 100		100	Benzo(a)pyrene	< 100		100
Acenaphthene	< 100		100	Indexo[1,2,3-od]pyrene	< 100		100
2,4-Dinitrotoluons	< 100		100	Dibenz(a,k)enthracens	< 100		100
Dibanadana	- 100		100	Bearing & December			

Q - Quelifier

Dibenzofuran

< 100

100

Benzo(g,h,i)perylene

Continued on the next page.

New Jersey Certified Lab# 14751

New York Cartified Lab # 11402

< 100

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^{. -} Result from diluted analysis.



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ANALYTICAL DATA REPORT

. DNHA = #13

for Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: SELF-MONTTORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION	< = LESS THAN THE MI			
		VOLATILES		
Lab ID: 1719-002 Client ID: 002 Matrix/Units: Aqueous - \mu g/L			Date Sampled: Time Sampled: Date Analyzed:	8/9/95 11:00 8/15/95
Compound	Conc.	MDL Compound	e Conc.	MDL
Chloromethane	< 100	100 Bromodichloromethane	< 100	100
Vinyl chloride	< 100	100 2-Chloroethylvinyl ether	< 100	100
Bromomethane	< 100	100 cis-1,3-Dichloropropene	< 100	100
Chloroethano	< 100	100 Toluene	< 100	100
Trichlorofluoromethane	< 100	100 trans-1,3-Dichloropropene	< 100	100
1,1-Dichloroethene	< 100	100 1,1,2-Trichloroethane	< 100	100
Methylene chloride	< 200	200 Tetrachloroethene	< 100	100
trans-1,2-Dichloroethene	< 100	100 Dibromochloromethane	< 100	100
1,1-Dichloroethane	< 100	100 Chlorobenzene	< 100	100
Chloroform	< 100	100 Ethylbenzene	< 100	100
1,1,1-Trichloroethane	< 100	100 Xylenes, total	< 100	100
Carbon tetrachloride	< 100	100 Bromoform	< 100	100
1,2-Dichloroethane	< 100	100 1,1,2,2-Tetrachloroethane	< 100	100
Benzene	< 100	100 1,3-Dichlorobenzene	< 100	100
Trichloroethene	< 100	100 1,4-Dichlorobenzene	< 100	100
1,2-Dichloropropane	< 100	100 1,2-Dichlorobenzene	< 100	100
	TENTATIV	ELY IDENTIFIED COMPOUNDS		••
Lab ID: 1719-002 Client ID: 002 Matrix/Units: Aqueous - μg/L			Date Sampled: Time Sampled: Date Analyzed:	8/9/95 11:00 8/15/95
CAS#	COMPOUND	ESTIMATED CONCENTRATION	RETENTIO TIME	N
· . • • •	Unknown	146000	5.82	

Continued on next page.

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New Jersey Certified Lab#-14751.



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ANALYTICAL DATA REPORT

. DNHA- #13

for Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION L	MIT		< = LESS T	HAN THE MD
· 	В	ASE NEUTRALS ACIDS		
Lab ID: 1719-002 Client ID: 002 Matrix/Units: Aqueous - μg/L			Date Sampled: Time Sampled: Date Analyzed:	11:00
Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine Phenol Aniline bis(2-Chloroethyl)ether 2-Chlorophenol 1,3-Dichlorobenzene 1,4-Dichlorobenzene Benzyl alcohol 1,2-Dichlorobenzene 2-Methylphenol bis(2-chloroisopropyl)ether 4-Methylphenol N-Nitroso-di-n-propylamine 2-Aminotoluene +4-Aminotoluene Hexachloroethane	< 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0	160.0 bis(2-Chloroethoxy)methane 160.0 Benzoic acid 160.0 2,4-Dimethylaniline 160.0 2,4-Dichlorophenol 160.0 1,2,4-Trichlorobenzene 160.0 Naphthalene 160.0 4-Chloroaniline 160.0 Hexachlorobutadiene 160.0 4-Chloro-3-methylphenol 160.0 2-Methylnaphthalene 160.0 Hexachlorocyclopentadiene 160.0 2,4,6-Trichlorophenol 160.0 2,4,5-Trichlorophenol	< 160.0 < 800.0 < 160.0 < 160.0	160.0 800.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0
riexacnioroethane Nitrobenzene	< 160.0 < 160.0	160.0 2-Nitroaniline 160.0 Dimethylphthalate	< 160.0	160.0
sophorone	< 160.0	160.0 2,6-Dinitrotoluene	< 160.0 < 160.0	160.0 160.0
2-Nitrophenol 2,4-Dimethylphenol	< 160.0 < 160.0	160.0 Acenaphthylene 160.0	< 160.0	160.0°

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ANALYTICAL DATA REPORT

for Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

DNHA #13

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION LIN	/IT			< = LESS T	HAN THE MDL
	В	ASE NEUTRALS ACIDS		2200 1	WILL SILL PIDE
Lab ID: 1719-002 Client ID: 002 Matrix/Units: Aqueous - μg/L	,	NO TO THE POPULATION OF THE PO		Date Sampled: Time Sampled: Date Analyzed:	11:00
Compound	Conc.	MDL Compound	28	Conc.	MDL
3-Nitroaniline Acenaphthene 2,4-Dinitrophenol 4-Nitrophenol 2,4-Dinitrotoluene Dibenzofuran Diethylphthalate Fluorene 4-Chlorophenyl-phenylether 4-Nitroaniline 4,6-Dinitro-2-methylphenol N-Nitrosodiphenylamine 1,2-Diphenylhydrazine/Azobenzene 4-Bromophenyl-phenylether	< 160.0 < 160.0 12100 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0 < 160.0	160.0 Carbazole 160.0 Di-n-butylphthalate 160.0 Fluoranthene 160.0 Benzidine 160.0 Pyrene 160.0 3,3'-Dimethylbenzidine 160.0 Butylbenzylphthalate 160.0 Benzo[a]anthracene 160.0 Chrysene 160.0 Di-n-octylphthalate 160.0 Benzo[b]fluoranthene 160.0 Benzo[b]fluoranthene		< 160.0 < 160.0	160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0
Hexachlorobenzene	< 160.0	160.0 Benzo[a]pyrens		< 160.0	160.0
Pentachlorophenoi	< 160.0	160.0 Indeno[1,2,3-cd]pyrene		< 160.0	160.0
Phenanthrene	< 160.0	160.0 Dibenz(a,h]anthracene		< 160.0	160.0
Anthracene	< 160.0	160.0 Benzo[g,h,i]perylene		< 160.0	160.0·

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D. Laboratory Director

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New York Certified Lab # 11402

New Jersey Certified Lab# 14751

TIERRA-B-004484



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ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101 VELLOW#5 Ba# 13

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION	11 111111		< = LESS	THAN THE M
Lab ID: 1719-001		VOLATILES		
Client ID: 001			Date Sampled:	8/9/95
Matrix/Units: Aqueous - μg/L			Time Sampled:	11:00
			Date Analyzed:	8/15/95
Compound	Conc.	MDL Compound	e Conc.	MDL
Chloromethane	< 100	100 Bromodichloromethane	< 100	100
Vinyl chloride	< 100	100 2-Chloroethylvinyl ether	< 100	
Bromomethane	< 100	100 cis-1,3-Dichloropropene	< 100	100
Chloroethane	< 100	100 Toluene	< 100	100
Trichlorofluoromethane	< 100	100 trans-1,3-Dichloropropene	< 100	100
1,1-Dichloroethene	< 100	100 1,1,2-Trichloroethane	< 100	100
Methylene chloride	< 200	200 Tetrachloroethene	< 100	100
trans-1,2-Dichloroethene	< 100	100 Dibromochloromethane	< 100	100
1,1-Dichloroethane	< 100	100 Chlorobenzene	< 100	100
Chloroform	< 100	100 Ethylbenzene	< 100	100
1,1,1-Trichloroethane	< 100	100 Xylenes, total	= = =	100
Carbon tetrachloride	< 100	100 Bromoform	< 100	100
1,2-Dichloroethane	< 100	100 1,1,2,2-Tetrachloroethane	< 100	100
Benzene	< 100	100 1,3-Dichlorobenzene	< 100	100
Trichloroethene	< 100	100 1,4-Dichlorobenzene	< 100	100
2-Dichloropropane	< 100	100 1,2-Dichlorobenzene	< 100	100
	1 100	1,2-Dictioropenzene	< 100	100
	TENTATIVI	ELY IDENTIFIED COMPOUNDS		٠.
ab ID: 1719-001			Date Sampled:	8/9/95
lient ID: 001				11:00
fatrix/Units: Aqueous - µg/L				8/15/95
			rame y zadi.	9r 13173
:AS#		ESTIMATED	RETENTION	ī
-nof	COMPOUND	CONCENTRATION	TIME	-
•	Unknown	158000	5 27	
•		150000	5.76	

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845340063

New York Certified Lab # 11402

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New Jersey Certified Lab# 14751.



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201 361-4252 Fax: 201 989-5268

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101 YELLOW 5, # 13

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION LI	MIT		< = LESS 7	HAN THE M
	В	ASE NEUTRALS ACIDS		
Lab ID: 1719-001 Client ID: 001 Matrix/Units: Aqueous - µg/L			Date Sampled : Time Sampled : Date Analyzed :	11:00
Compound	Conc.	MDL Compound	" Conc.	MDL
N-Nitrosodimethylamine	< 40.0	40.0 bis(2-Chloroethoxy)methane	< 40.0	40.0
Phenoi	< 40.0	40.0 Benzoic acid	< 200.0	200.0
Aniline	< 40.0	40.0 2,4-Dimethylaniline	< 40.0	40.0
bis(2-Chloroethyl)ether	< 40.0	40.0 2,4-Dichlorophenol	< 40.0	40.0
2-Chloroph eno l	< 40.0	40.0 1,2,4-Trichlorobenzene	44.2	40.0
1,3-Dichlorobenzene	< 40.0	40.0 Naphthalene	< 40.0	40.0
1,4-Dichlorobenzene	< 40.0	40.0 4-Chloroaniline	442	40.0
Benzyl alcohol	< 40.0	40.0 Hexachlorobutadiene	< 40.0	40.0
,2-Dichlorobenzene	< 40.0	40.0 4-Chloro-3-methylphenol	< 40.0	40.0
2-Methylphenol	< 40.0	40.0 2-Methylnaphthalene	< 40.0	40.0
ois(2-chloroisopropyl)ether	< 40.0	40.0 Hexachlorocyclopentadiene	< 40.0	·· 40.0
i-Methylphenoi	< 40.0	40.0 2,4,6-Trichlorophenol	< 40.0	40.0
N-Nitroso-di-n-propylamine	< 40.0	40.0 2,4,5-Trichlorophenol	< 40.0	40.0
2-Aminotoluene +4-Aminotoluene	< 40.0	40.0 2-Chloronaphthalene	< 40.0	40.0
Hexachloroethane	< 40.0	40.0 2-Nitroaniline	< 40.0	40.0
Nitrobenzene	< 40.0	40.0 Dimethylphthalate	< 40.0	40.0
sophorone	< 40.0	40.0 2,6-Dinitrotoluene	< 40.0 < 40.0	40.0 40.0
-Nitrophenol	< 40.0	40.0 Acenaphthylene	< 40.0 < 40.0	
2,4-Dimethylphenol	< 40.0	40.0	< 40.0	40.0*

Continued on next page.

845340064



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201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719 VELLOW#15, Ba#13

MDL = METHOD DETECTION LIMIT			< = LESS THAN THE MI		
_	В	ASE NEUTRALS ACIDS			
Lab ID: 1719-001			Date Sampled:	8/9/95	
Client ID: 001			Time Sampled:	11:00	
Matrix/Units: Aqueous - μg/L			Date Analyzed:	8/15/95	
Compound	Conc.	MDL Compound	* Conc.	MDL	
3-Nitroaniline	< 40.0	40.0 Carbazole	< 40.0	40.0	
Acenaphthene -	< 40.0	40.0 Di-n-butylphthalate	< 40.0	40.0	
2,4-Dinitrophenol	< 40.0	40.0 Fluoranthene	< 40.0	40.0	
4-Nitrophenol	< 40.0	40.0 Benzidine	< 40.0	40.0	
2,4-Dinitrotoluene	< 40.0	40.0 Pyrene	< 40.0	40.0	
Dibenzofuran	< 40.0	40.0 3,3'-Dimethylbenzidine	< 40.0	40.0	
Diethylphthalate	< 40.0	40.0 Butylbenzylphthalate	< 40.0	40.0	
Fluorene	< 40.0	40.0 3,3'-Dichlorobenzidine	< 40.0	40.0	
4-Chlorophenyl-phenylether	< 40.0	40.0 Benzo[a]anthracene	< 40.0	40.0	
4-Nitroaniline	< 40.0	40.0 Chrysone	< 40.0	40.0	
4,6-Dinitro-2-methylphenol	< 40.0	40.0 bis(2-Ethylhexyl)phthalate	< 40.0	40.0	
N-Nitrosodiphenylamine	< 40.0	40.0 Di-n-octylphthalate	< 40.0	40.0	
1,2-Diphenylhydrazine/Azobenzene	< 40.0	40.0 Benzo[b]fluoranthene	< 40.0	40.0	
4-Bromophenyl-phenylether	< 40.0	40.0 Benzo[k]fluoranthene	< 40.0	40.0	
Hexachiorobenzene	< 40.0	40.0 Benzo[a]pyrene	< 40.0	40.0	
Pentachlorophenoi	< 40.0	40.0 Indeno[1,2,3-cd]pyrene	< 40.0	40.0	
Phenanthrene	< 40.0	40.0 Dibenz[a,h]anthracene	< 40.0	40.0	
Anthracene	< 40.0	40.0 Benzo[g,h,i]perylene	< 40.0	40.0	

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D. Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

845340065

New Jersey Certified Lab# 14751



273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: Internal Monitoring Lab Case Number: 10950 - 1439 NOPD

The state of the s		VOLAT	ILES - (601/602)		< = LESS T	
Lab ID: 1439-001					Date Sampled:	7/7/95
Client ID: 001					Time Sampled:	
Matrix/Units : Aqueous - μg/L			•		Date Analyzed:	
Compound	Conc.	MDL	Compound	**	Conc.	MDL
Chloromethane	< 50.0	50.0	Bromodichloromethane		< 50.0	50.0
Vinyl chloride .	< 50.0	50.0	2-Chloroethylvinyl ether		< 50.0	50.0
Bromomethane	< 50.0	50.0	cis-1,3-Dichloropropene		< 50.0	50.0
Chloroethane	< 50.0	50.0	Toluene		< 50.0	50.0
Trichlorofluoromethane	< 50.0	50.0	trans-1,3-Dichloropropene		< 50.0	50.0
1,1-Dichloroethene	< 50.0	50.0	1,1,2-Trichloroethane		< 50.0	50.0
Methylene chloride	< 100.0	100.0	Tetrachloroethene		< 50.0	50.0
trans-1,2-Dichloroethene	< 50.0	50.0	Dibromochloromethane		< 50.0	50.0
1,1-Dichloroethane	< 50.0	50.0	Chiorobenzene		< 50.0	50.0
Chloroform	< 50.0	50.0	Ethylbenzene		< 50.0	50.0
1,1,1-Trichloroethane	< 50.0	50.0	Xylenes, total		< 50.0	50.0
Carbon tetrachloride	< 50.0	50.0	Bromoform		< 50.0	50.0
1,2-Dichloroethane	< 50.0	50.0	1,1,2,2-Tetrachloroethane		< 50.0	50.0
Benzene	< 50.0	50.0	1,3-Dichlorobenzene		< 50.0	50.0
Trichloroethene	< 50.0	50.0	1,4-Dichlorobenzene		< 50.0	50.0
1,2-Dichloropropane	< 50.0	50.0	1,2-Dichlorobenzene		< 50.0	50.0

TOTAL CYANIDE

Lab ID: 1439-001 Client ID: 001

Matrix/Units: Aqueous

oug - μg/L

λ/(

Date Sampled: 7/7/95 Time Sampled: 14:00 Date Analyzed: 7/12/95

Result

MDL

< 0.05

0.05 .

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin Ph.D Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751





273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5286

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: Self-Monitoring Lab Case Number: 10950 - 1438 NOPI

MDL = METHOD DETECTION I	< = LESS THAN THE MD			
		BASE NEUTRALS		
Lab ID: 1438- 001			Date Sampled:	7 <i>171</i> 95
Client ID: 001			Time Sampled:	14:00
Matrix/Units : Aqueous - μg/L		•	Date Analyzed:	7/t5/95
Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 50.0	50.0 Diethylphthalate	< 50.0	50.0
Aniline	< 50.0	50.0 Fluorene	< 50.0	50.0
bis(2-Chloroethyl)ether	< 50.0	50.0 4-Chlorophenyl-phenylether	< 50.0	50.0
1,3-Dichlorobenzene	< 50.0	50.0 4-Nitroaniline	< 50.0	50.0
1,4-Dichiorobenzene	< 50.0	50.0 N-Nitrosodiphenylamine	< 50.0	50.0
Benzyl alcohol	< 50.0	50.0 1,2-Diphenylhydrazine/Azoben	zene < 50.0	50.0
1,2-Dichlorobenzene	< 50.0	50.0 4-Bromophenyl-phenylether	< 50.0	50.0
bis(2-chloroisopropyl)ether	< 50.0	50.0 Hexachlorobenzene	< 50.0	50.0
N-Nitroso-di-n-propylamine	< 50.0	50.0 Phenanthrene	< 50.0	50.0
Hexachloroethane	< 50.0	50.0 Anthracene	< 50.0	50.0
Nitrobenzene	< 50.0	50.0 Carbazole	< 50.0	50.0
Isophorone	< 50.0	50.0 Di-n-butylphthalate	< 50.0	50.0
bis(2-Chloroethoxy)methane	< 50.0	50.0 Fluoranthene	< 50.0	50.0
1,2,4-Trichlorobenzene	< 50.0	50.0 Benzidine	< 50.0	50.0
Naphthalene	< 50.0	50.0 Pyrene	< 50.0	50.0
4-Chloroaniline	< 50.0	50.0 3,3'-Dimethylbenzidine	< 50.0	50.0
Hexachlorobutadiene	< 50.0	50.0 Butylbenzylphthalate	< 50.0	50.0
2-Methylnaphthalene	< 50.0	50.0 3,3'-Dichlorobenzidine	< 50.0	50.0
Hexachlorocyclopentadiene	< 50.0	50.0 Benzo[a]anthracene	< 50.0	50.0
2-Chloronaphthaiene	< 50.0	50.0 Chrysene	< 50.0	50.0
2-Nitroaniline	< 50.0	50.0 bis(2-Ethylhexyl)phthalate	< 50.0	50.0
Dimethylphthalate	< 50.0	50.0 Di-n-octylphthalate	< 50.0	50.0
2.6-Dinitrotoluene	< 50.0	50.0 Benzo[b]fluoranthene	< 50.0	50.0
Acenaphthylene	< 50.0	50.0 Benzo[k]fluoranthene	< 50.0	50.0
3-Nitroaniline	< 50.0	50.0 Benzo[a]pyrene	< 50.0	50.0
Acenaphthene	< 50.0	50.0 Indeno[1,2,3-cd]pyrene	< 50.0	50.0
2,4-Dinitrotoluene	< 50.0	50.0 Dibenz[a,h]anthracene	< 50.0	50.0
Dibenzofuran	< 50.0	50.0 Benzo[g,h,i]perylene	< 50.0	50.0

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Rh.D. Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751



273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5268

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

NOPD

Project Name: Self-Monitoring Lab Case Number: 10950 - 1438

MDL = METHOD DETECTION	LIMIT			< = LESS THAN THE MD
_		ACI	DS	
Lab ID: 1438- 001				Date Sampled: 7/7/95
Client ID: 001				Time Sampled: 14:00
Matrix/Units : Aqueous - μg/L				Date Analyzed: 7/18/95
Compound	Result	Q	MDL	e ^s
Phenol	< 10.0		10.0	
2-Chlorophenol	< 10.0		10.0	
2-Methylphenol	< 10.0		10.0	
4-Methylphenol	< 10.0		10.0	
2-Nitrophenol	< 10.0		10.0	
2,4-Dimethylphenol	< 10.0		10.0	
Benzoic acid	< 50.0		50.0	
2,4-Dichlorophenol	< 10.0		10.0	
4-Chioro-3-methylphenol	< 10.0		10.0	
2,4,6-Trichlorophenol	< 10.0		10.0	
2,4,5-Trichlorophenol	< 10.0		10.0	
2,4-Dinitrophenol	< 10.0		. 10.0	
4-Nitrophenol	< 10.0		10.0	
4,6-Dinitro-2-methylphenol	< 10.0		10.0	
Pentachlorophenol	< 10.0		10.0	
		pH/Corro	sivity	
Lab ID : 1438- 001		_	•	Date Sampled: 7/7/95
Client ID: 001				Time Sampled: 14:00
Matrix/Units : Aqueous - μg/L				Date Analyzed: 7/13/95
Compound	Result		MDL	
pH	12.58		+.02	

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

lichael H. Leftin, Ph.D.

Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751

ACCREDITED LABORATORIES, INC. VOLATILE ORGANIC ANALYSIS DATA

ASE NUMBER PLE NUMBER	2713 9507011	MATRIX Aqueous DILUTION FACTOR 18
TA FILE	>A3114	DATE EXTRACTED
ULIENT NAME	CCI	DATE ANALYZED 86/02/95
FIELD ID	RED#3	ANALYZED BY LARRY

24023			***	244554	******	\$	*********	
CAS #	COMPOUND	UG/L		HDL.	CAS ‡	COMPOUND	UG/L	MOL
107028	Acrolein			61	78875	1,2-Dichloropropane	*==#6232423	*******
107131	Acrylonitrile	Ū		66	10061015	cis-1,3-Dichloropropens	U	4.0
74873	Chloromethane	Ü		20	79016	Trichloroethene	u	4.0
74839	Bromomethane	Ü		28	71432	Benzene	U	4.0
75014	Vinyl Chloride	ū		20	124481		Ü	4.0
75003	Chloroethane	11		20	79005	Dibromochloromethane	บ	4.0
75092	Methylene Chloride	32	¥	10	10061026	1,1,2-Trichloroethane	IJ	4.0
67641	Acetone _	11	•	18	118758	trans-1,3-Dichloropropene	U	4.0
75150	Carbon Disulfide	11		4.0		2-Chloroethylvinylether	U	20
75694	Trichlorofluoromethane	ü		4.8	75252 501707	Brama form	Ų	4.0
75354	1,1-Dichloroethene	11		4.0	591 <i>7</i> 86 108101	2-Hexanone	Ü	9.8
75343	1,1-Dichloroethane	ŭ		4.0	127184	4-Methyl-2-pentanone	Ü	7.0
156605	trans-1,2-Dichloroethene	Ü		4.8	79345	Tetrachioroethene.	U	4.0
67663	Chloraform	41	W	4.0	108883	1,1,2,2-Tetrachloroethane	U	6.0
107062	1,2-Dichloroethame	50	ij.	4.0		Toluene	17	5.8
78933	2-Butanone	54		4.8	108907	Chlorobenzene	U	4.0
71556	1,1,1-Trichlorcethane	J.		4.0	100414	Ethylbenzene	U	10
. 135	Carbon Tetrachloride	П			100425	Styrene	IJ	4.0
`094	Vinyl Acetate	Ü		4.0	1330207	m,p-Xylene	35	28
.14	Bromodichloromethane	_		8.0	95476	o-Xy i ene	ប	21
-7	ni Amariculatanne (1946	31	¥	4.0	156592	cis-1,2-Dichloroethane	U	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	101 ×	76-114	OK
Taluene-dB	100 ×	88-110	DK.
Bromofluorobenzene	<u>96</u> %	86-115	- OK

J - Indicates compound concentration found below HDL.

U - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.

W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

ACCREDITED LABORATORIES, INC. BNA ORGANIC ANALYSIS DATA

TASE NUMBER	2713	
SAMPLE NUMBER	9507011	
DATA FILE	>F1875	
CLIENT NAME	CCI	
FIELD 10	RED#3	

MATRIX	Aqueous
DILUTION FACTOR	5
DATE EXTRACTED	05/24/95
DATE ANALYZED	06/07/95
ANALYZED BY	PAUL

CAS \$	COMPOUNO	UĠ/L	MOL.	CAS \$	COMPOUND	UG/L	HOL
108952	Pan-eastersnotstanotstatettettett	u U	50	59507	4-Chloro-3-methylphenol	Ü	50
140774 955 <i>7</i> 8	2-Chlorophanal	ŭ	50	88062	2,4,6-Trichlorophenol	เช	50
95487	2-Methylphanol	ŭ	50	95954	2,4,5-Trichlorophenol	U	250
77407 108394	384-Methylphenol	ü	50	51285	2.4-Dinitrophenol	Ų	250
100274 88 <i>7</i> 55	2-Ni tropheno l	. 11	58	100827	4-Ni tropheno I	U	250
105679	2.4-Dimethylphenol	ū	50	534521	4,6-Dinitro-2-methylphenol	IJ	250
128832	2,4-Dichiarephenol	ū	50	87865	Pentach lorophanol	U	250
111444	bis(-2-Chloroethyl)Ether	ŭ	50	121142	2.4-Dinitrotoluene	ម	50
641731	1,3-Dichlorobenzene	Ū	50	84662	Diethylphthalate	U	50
106467	1,4-Dichtorobenzene	ŭ	50	7085723	4-Chlorophenyl-phenylether	U	50
198516	Benzyl Alcohol	Ū	50	86737	Fluorene	U	50
45581	1.2-Dichtgrobenzene	ũ	50	100016	4-Nitroaniline	U	250
108601	bis(2-Chloroisooropyl)ether	ď	50	86306	N-Nitrosodiphenylamine	U	50
321647	N-Nitroso-Di-n-propylamine	U	50	101553	4-Bromophenyl-phenylether	u	50
57721	Hexachloroethane	Ū	50	118741	Hexachlorobenzene	U	50
8955	Nitrobenzene	บ	50	85018	Phenanthrene	U	50
8591	Isophorone	U	50	120127	Anthrecene	U	50
.5850	Benzoic Acid	ប	250	84742	Di-n-Butylphthalate	វ	50
111911	bis(-2-Chloroethoxy)Methane	U	50	206440	Fluoranthens	IJ	50
120821	1,2,4-Trichlorobenzene	υ	90	129000	Pyrene	U	50
91203	Naphthalene	U	50	85687	Butylbenzylphthalate	U	58
106478	4-Chloroaniline	บ	58	91941	3,3'-Dichlorobenzidine	U	100
87683	Hexach lorobut ad iene	U	50	56553	Benzo(a)Anthracene	Ú	50
915 <i>7</i> 6	2-Methy inaphthalene	U	58	117817	Bis(2-Ethylhexyl)Phthalats	U	50
77474	Hexach Lorocyc Lopentadiene	IJ	50	218019	Chrysene	ť	50
V1587	2-Chipronaphthalene	U	50	117840	Di-n-octyl phthalats	U	50
88744	2-Nitroaniline	18 6 J	250	285992	Benzo(b)fluoranthane	ย	50
131113	Dimethol Phthalate	IJ	50	207 0 89	Benzo(k)Fluoranthene	ប	50
28968	Acenaphthylane	Ū	50	50328	Benzo(a)Pyrene	U	50
99 892	3-Nitroaniline	ŧ	250	193395	Indena(1,2,3-cd)Pyrene	U	50
83329	Acenaphthens	U	50	53703	Dibenzo (a ,h)Anthracens	U	50
132649	Dibenzofuran	Ū	50	191242	Benza(g,h,i)Perylana	U	50
606202	2.6-Dinitratoluene	tı	50	62759	N-Nitrosodimethylamine	U	50

SURROGATE COMPOUNOS	RECOVERY	LIMITS	STATUS
Ni t robenzene-d5	<u>59</u> %	35-114	OK
2-Fluorobiphenyl	81 %	43-116	<u>UK</u>
Terphenyl-d14	21 %	33-141	<u>out</u>
Pheno 1-d5	24 %	18- 94	OK
2-Fluorophenol	127 *	21-100	<u> </u>
2,4,6-Tribromophenol	HOT SEEDER	DETECTED	******
- T		_	

[→] J - Indicates compound concentration found below HDL.

B - Indicates compound found in associated blank.

^{1 -} Indicates compound enalyzed for but not detected.

W - Result exceeds specific ground water quality criteria.*

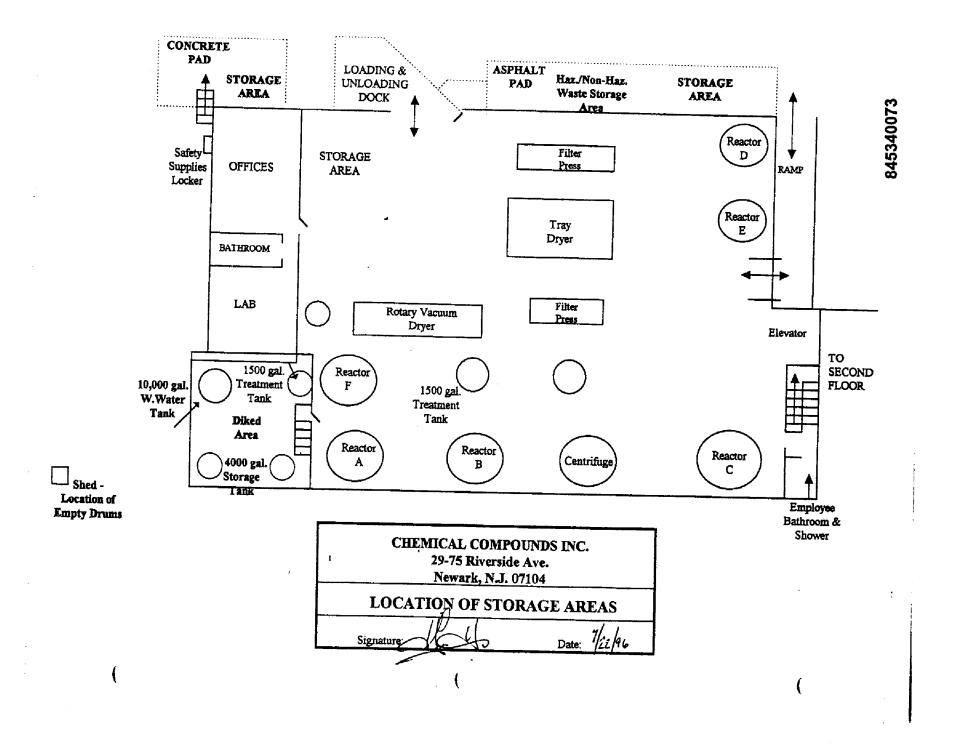
^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

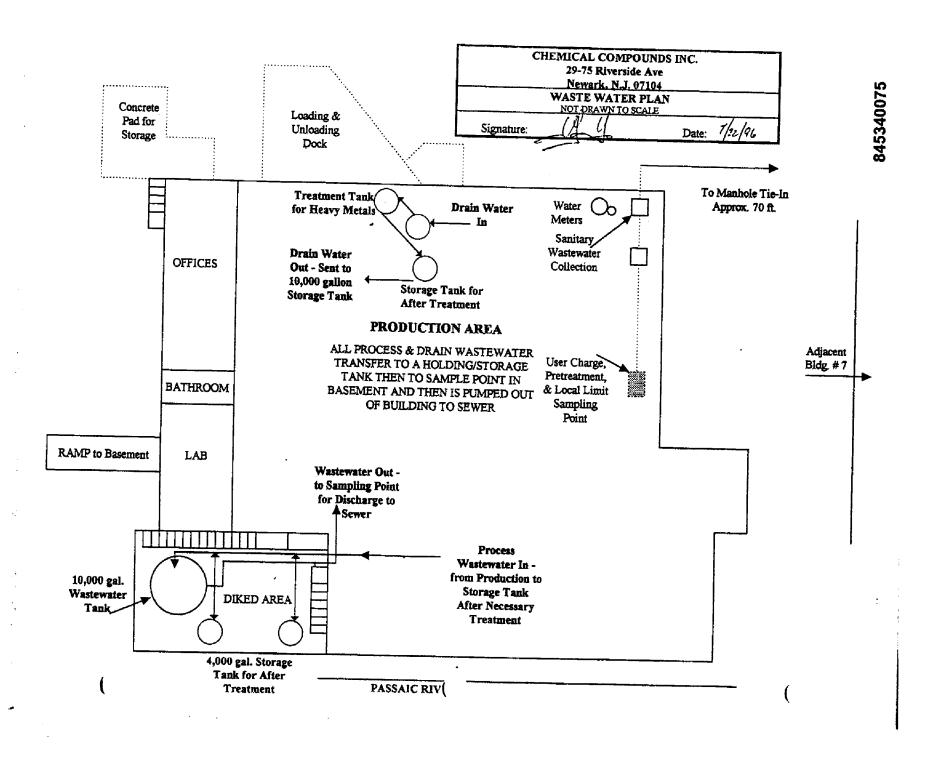
^{** 3-}Methylphonol and 4-Methylphonol can not be separated by the method applied

ACCREDITED LABORATORIES, INC. GENERAL CHEMISTRY ANALYSIS DATA

Case #: Sample #: Client Name: Field Number:	2713 9507011 CCI RED#S			Matrix: Date Recei	ved:	<u>Agueous</u> 05/19/9	5
ANALYTES	RESULTS	HDL	UNITS	DILUTION FACTOR	METHOD B	LANK MOL	ANALYSIS DATE
Cyanide, Total	МО	0.01	mg/L	1.	MD	0.01	05/23/95







غ

Maw Jersey Department of Environmental Protection and Energy Division of Responsible Party Site Remediation Bureau of Emergency Response Region I

INVESTIGATION

Jaan #1 92-01-07-1025

File #: 0714 PAC CODE: TFF

Date: 01/07/92

Investigator: Natthew Garamone Christopher Gibbons

Time Arrived: 1115

Location: Chemical Compounds, Inc.

Time Doparted: 1400

Address: 29-75 Riverside Avenue Newark, NJ

Researchaible Party: Chemical Compounds, Inc. Marriand Address: 29-75 Riverside Avenue Newark, NJ

odation Phone #: 201-485-3211

RULLER Dept. Rep: Bob Swales - Newark OEM

Phone #: 201-733-3664

Octavin of Complaint: Oper, Piccitto - NJSP Marine Bureau

Phone # : 201-578-8173

Takens of Complaint: Unknown liquid being discharged from pipe onto

illings: BER Region I responded to Newark to investigate the report MUSP Marine Bureau at Newark Bay of the discharge of an burn, purple liquid from a pipe at the Chemical Compounds facility entering the Passaic River. MPO's Mundorff and Kirschner of the SUST Marine Bureau at Newark Bay were investigating a complaint of a sustained illegal discharge from Chemical Compounds' facility by and syses at the Napp-Grecco Company adjacent to the incident Mpols Mundorff and Kirschner reported to Investigators and Gibbons that they had observed a hose line coming from the of the Chemical Compounds building and discharging an purple liquid onto the ground adjacent to the Passaic River.

The stained area with a free-standing puddle of a dark purple with a strong oder of agetic acid. There were also signs of the chemical control of the property between the facility and the river revealed the stained area with a free-standing puddle of a dark purple with a strong oder of agetic acid. There were also signs of the chemical control of the chemical compounds. spillage over the bulkhead and into the river at this location. No Nox

the incident location the fear of the property, near to the Napp-Greco Co. Is an openfor with an exposed sanitary sewer line. There were free standing a continuous of dark purple liquid in this area. According to Chemical expounds owners, Alberto Celleri and Harold Sullivan, the facility.

S0.9 488-T FROM Robert C Matule, Esq

848484 TO SET 86, 60 300

been experiencing problems with this sanitary line backing-up and the last autempting to unclog it by pumping it out and snaking the line and snaking the line wildle of dark purple liquid, on the side of the facility next to the last country was the result of the floors of the process area being the Lor accetic acid and had a pH of 1.

in the rear of the facility. Disposal of this material is the chemical waste Management which manifests the waste as a facility also disposed of waste methanol in the facility (MMID 108-66-1737). The facility maintains a tanker system according to Mr. Celleri. The facility, however, has no the sanitary line.

MPO's Mundorff and Kirschner went to Clara Mass Hospital in Belleville due to chemical exposure at the incident location. In addition, 8 supplyings at the Napp-Greco Co. adjacent to the incident location in Kearny. Investigators from the Essex County Prosecutor's fize and the Division of Criminal Justice also performed an vestigation of this incident. Investigators Garamone and Gibbons vestigation of this incident. Investigators Garamone and Gibbons non-notification of a discharge of a hazardous substance pursuant to a clean-up of all free-standing liquid on the property and to the admitted for analysis of the stained areas of ground and the need to remove any contaminated soil based on these

by the NJSP Marine Bureau of the illegal dumping of an unknown into the Passaic River from the Chemical Compounds facility acetic anhydride occurred onto the ground at the facility.

Into the Passaic River from the Chemical Compounds facility acetic anhydride occurred onto the ground at the facility.

Into of Newark was hired by the facility to perform a clean-up.

Was issued for this discharge and the incident is under a county.

845340078

FROM Robert C Matule, Esq T-861 P. S.

0785287105 0T.02:01.52.100 SM

intigator			Date	tro for foll soil affecte ardous wast	
	- Name and company of		Date		•
		•	Date		
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		·			*

NEWARK FIRE DEPARTMENT

OFFICE OF HAZARDOUS MATERIALS 188 Mulberry Street Newark, New Jersey 07102

STANLEY J. KOSSUP
Director/Fire Chief

(201) 733-7506

Fax (201) 733-7468

Chemical Compounds 29-75 Riverside Avenue Newark, NJ 07104

January 10, 1992

attn: Mr. Harold Sullivan

On January 7, 1992, the Newark Fire Department's Hazardous Materials Unit responded to your facility, Chemical Compounds at, 29 Riverside Avenue. The complaint regarded unidentified liquid flowing from a hose line on the second floor of your building, down a set of exterior stairs, onto the ground and into the Passaic River.

This action is a violation of the City of Newark's Hazardous Materials Regulations. You are in violation of the following:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spilled hazardous materials.

Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

On January 7, 1992, you or one of your employees disconnected a hose line leading into a waste recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected earth, and into the Passaic River.

Section 10.1b It shall be unlawful to use or operate any bulk storage area or part thereof without:

ROMENTS AND AND STATE OF THE

(b) providing for the segregation of potentially reactive chemicals which materials or which may react so as to form hazardous materials, and which present or cause a hazardous or dangerous condition.

X

It was noted that oxidizers, (M & T Chromic Acid) are stacked on top of corrosives. (Ethylene Cholorhydrin)

Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

An unqualified person disconnected the hose leading to the waste container. If the person was qualified he would have been required to know that the product he was discharging onto the ground was hazardous.

Section 15.1 In the event of fire, explosion, structural failure, leakage or other discharge relating to hazardous materials requiring notifications under Federal or State law, the permit holder shall also notify the Director.

The permittee shall submit to the Director within ten days a copy of the written report pursuant to the Hazardous Substance Discharges: - Reports and Notices Act, N.J.S.A. 13:1K-15, and regulations promulgated thereunder.

The permittee shall also provide information to the Director relating to the ability of the permittee to contain and dispose of the hazardous material, the estimated time it will take to complete storage and disposal, the degree of hazard created and the quantity and type of material released. The Director may verify that the hazardous material is being contained and appropriately disposed.

X

The appropriate agencies were not notified when the spill, leak or discharge occurred. A private citizen reported this incident to the State Police.

- Section 17.1c Failure to abate, correct or rectify any noncompliance with the provisions of these Regulations any permit conditions or any provisions of the Hazardous Materials Management Plan with the time specified in the Notice of Noncompliance;
- Section 17.3 If the cause of the noncompliance is not abated, corrected, or rectified within the time specified in the Notice of Noncompliance, a Notice of Violation shall be issued.

The Notice of Violation shall be in writing and shall include a reference to the original Notice of Noncompliance, the unconditional right to a hearing and the remedial action to be undertaken.

Under conditions of imminent hazard the Director may issue a Notice of Violation without issuing a Notice of Noncompliance.

- Section 17.4 A request for a hearing by the permittee shall be given to the Director in writing, setting forth in particular any defense the permittee might have in regard to the alleged violations, and a brief statement of the factual matters in support thereof. The notice of the hearing date shall be given by the Director at least ten (10) days prior to the hearing date.
- Section 18.4 Every Permit holder shall insure that a qualified person shall be in charge at all times and at each and every place where hazardous materials operations are carried out. The qualified person shall remain on the premises as long as the manufacture, use processing, or handling of hazardous materials is being carried out and shall return to the premises when required under emergency circumstances. To be a qualified person, the individual shall be knowledgeable in the chemical and physical processes utilized by the Permit holder.

The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow the holder to pass through any manned emergency barricades and enter the permittee facility in the event of an emergency.

The person who placed the hose leading from the building to the ground and into the river did not remain on the premises.

Section 20.2 Whenever in these Regulations any act is prohibited or is made or declared to be unlawful, or whenever in these Regulations the performance of any act is required or the failure to perform any act is made or declared to be unlawful, the commission of any such prohibited act or the failure to perform any such act, shall be punished by a fine or not more than \$1,000.00 per day per violation or by imprisonment for a term of not more than 90 days, or by any combination of such fine and imprisonment. Each day any violation of these Regulations continues shall be considered a separate offense.

You have been found to be in violation of five sections of the City of Newark's

Hazardous Materials Regulations.

Battalion Chief A. Apostolico

AA:lm

calion Chief A.

733-7497

733-7497

133-1497

133-1497

January 31, 1992

Ensi Inc. 194 Avenue L Newark, NJ 07105

Attn: Fred Virrazzi

Nytest is pleased to submit our Project No. 9218614 Log in No. 10997 on your sample (s) received: 1/09/92

Test sample (s) associated with this project will be retained for a period of thirty (30) days, unless otherwise instructed.

My staff is available to answer any questions concerning our report and we look forward to serving your future analytical needs.

Very truly yours,

Nytest phvironmental Inc.

Remo Gigante Exec. VP

RG: . Enc.

SHIPPED VIA:

UPS RED

845340085

box 1518 \square 60 seaview blvd., port washington, ny 11050 \square (516) 625-5500 fax (516) 625-1274

nytest environmental...

Sample Identification and Results

Log In No.: 10997

Sample No: 1 Lab Sample ID No.: 1099701

	Max.		
Results	Allowable Levels		Found
			*
•		•	
рн а 20 с	2 - 12.5	-	4.35
Ignitabil <u>i</u> ty, F PM	140		> 212
Corrosivity, inches/year	0.250		< 0.01
Reactivity to Cyanide, PPH	•		< 1.0
Reactivity to Sulfide, PPM	•		< 1.0
Total Solids, X	•	44	49.3
Petroleum Hydrocarbons, PPM (Dry Vt.)	•		5350
FC8's ,PPH (Dry WT.)	-		< 2.0

#D = None Detected
< = Less than</pre>

00010

TECHNION INC. 250 Delawanna Avenue Clifton, New Jersey 07014 201-773-5013 FAX #: 201-773-4788

LAB DEP #: 07190

CLIENT: Chemical Compounds Inc.

CLIENT REF: 22592

TECHNION REF: 16031

MATERIAL: One (1) composite from eleven (11) drums

DATE RECEIVED: 2-25-92

LAB ID: 0122T

ANALYSIS REQ: RCRA Waste characteristics

The above samples were as received on 2-25-92 and analyzed as requested.

ANALYST: Sam Yart, Mara Fishman

CERTIFICATE OF ANALYSIS

TEST RESULTS:

All test results are as attached.

Respectfully submitted,

Susan Baturay, D.Sc. Laboratory Director

SB/sn 16031

TECHNION INC., 250 Delawanna Avenue Clifton, New Jersey 07014 Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE/TIME: 2-27-92/10:00

SAMPLE DATED: 2-25-92

SAMPLE I.D.: Composite

TEST RESULTS FOR TCLP METALS

METALS _	RESULTS	BLANK	MDL	MAX. ALLOWABLE LIMITS
Arsenic	N.D.	<0.01	0.01	5.0
Barium	N.D.	<0.01	0.01	100.0
Cadmium	N.D.	<0.01	0.01	1.0
Chromium	N.D.	<0.01	0.01	5.0
Lead	N.D.	<0.01	0.01	5.0
Mercury ·	N.D.	<0.002	0.002	0.2
Selenium	N.D.	<0.01	0.01	1.0
Silver	N.D.	<0.01	0.01	5.0

Test results are in mg/l, unless specified.

N.D.: Not Detected

M.D.L.: Minimum Detection Limit

TECHNION INC., 250 Delawanna Avenue Clifton, New Jersey 07014 Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE: 2-27-92

DATE SAMPLED: 2-25-92

SAMPLE I.D.: Composite

HAZARDOUS WASTE CHARACTERISTICS

WASTE CHARACTERISTICS	RESULTS	BLANK	MDL	MAX. ALLOWABLE LIMITS (ppm)
PCB (mg/l) Reactivity for CN-(mg HCN, Reactivity for S-(mg H2S/ Total Pet.Hydc.(TPHC)(mg/ Ignitability (oF) Corrosivity as pH	1) N.D.	N.D. N.D. N.D. N.D. N/A	0.36 5.Q 10.0 0.10 N/A N/A	(mg/kg) 5-50 250 500 30000 >140 2 <ph 12.5<="" <="" td=""></ph>

. Test results are in mg/l, unless specified.

N/A: Not Applicable N.D.: Not Detected

MDL: Minimum Detection Limit

TECHNION INC., 250 Delawanna Avenue Clifton, New Jersey 07014 Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE: 2-26-92

DATE SAMPLED: 2-25-92

RESULTS FOR PH MEASUREMENTS

SAMPLE ID	RESULTS (unit)
1	5.2
2 ~	5.1
3	4.9
4	5.1
5	4.2
6	5.8
7	4.3
8	5.7
9	4.1
10	4.2
11	4.2
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)	TECHNION, Tests, and Hose are 250 Delawama Clitton, New Jest	Academitery : Agrenue	<u>P/CI</u> LAB	1 c# 2)	
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l.		RECEIVED BY	ORGANIZATION TECHNION INC.	DATE/TIME	REHMRKS	

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GABRIEL M. AMBROSIO, ESQ. 464 Valley Brook Avenue P.O. Box 911 Lyndhurst, New Jersey 07071 (201) 933-8844 Attorneys for Plaintiff

HANRY A. MARGOLIS F.J. Ch

PASSAIC VALLEY SEWERAGE COMMISSIONERS, a body politic :

DOCKET NO: C-338-93

and corporate of the state of New Jersey,

Civil Action

SUPERIOR COURT OF NEW JERSEY : CHANCERY DIVISION - ESSEX COUNTY

Plaintiff,

CONSENT ORDER AND FINAL JUDGMENT

v.

CHEMICAL COMPOUNDS, INC.,

Defendant.

This matter having been opened to the Court by Gabriel M. Ambrosio, Esq. (John T. Ambrosio, Esq., appearing) on behalf of the plaintiff, the PASSAIC VALLEY SEWERAGE COMMISSIONERS ("PVSC"), alleging that the defendant, Chemical Compounds, Inc. ("Chemical Compounds"), violated the provisions of N.J.S.A. 58:14-1 et seq. by discharging pollutants in excess of Sewer Connection Permit No. 20407122 ("Permit"), the rules and regulations of the PVSC and the Categorical Pretreatment Regulations promulgated by the United States Environmental Protection Agency ("USEPA") at 40 C.F.R. S 414, and the defendant, without admitting any fact, liability or fault as to any or all of the allegations of the complaint, having consented to the entry of the within Consent Order and Final Judgment, and for good cause thus shown;

IT IS on this day of December 1994; ORDERED that:

Civil Penalties

1. Within 10 days of the date hereof, the defendant, Chemical Compounds, shall pay to the PVSC the sum of six-thousand dollars (\$6,000.00) (the "Settlement Amount") in settlement of all civil penalties that could have been assessed against the defendant for allegedly having violated the provisions of N.J.S.A. 58:14-1 et seq. by discharging pollutants in excess of the Categorical Pretreatment effluent limitations promulgated at 40 C.F.R. § 414 and incorporated by reference in the Permit between July 1, 1991 and the present, including, but not limited to, those alleged violations set forth in the complaint filed by the plaintiff in this action. All settlement payments shall be made payable to the "Passaic Valley Sewerage Commissioners."

Compliance Schedule

- 2. Chemical Compounds shall comply with the following schedule for the purpose of controlling and eliminating discharges in excess of the Lead, Zinc and Cyanide limitations of the \$\frac{1}{2}\$ 414 Categorical Pretreatment Regulation and the Permit:
 - (a) Chemical Compounds shall immediately commence and implement a study program for the purpose of identifying possible raw materials and in-plant processes which may be the source of Lead and Zinc entering its wastewater system.

- (b) On or before December 1, 1994, Chemical Compounds shall submit a First Interim Report to the PVSC detailing its compliance with the discharge limitations for Lead, Zinc and Cyanide. If the results of the First Interim Compliance Report indicate that no additional pretreatment control equipment is required, Chemical Compounds shall be in compliance with the limitations for the discharge of Lead and Zinc on or before December 1, 1994. If the results of the First Interim Compliance Report indicate that additional pretreatment control equipment is required to achieve compliance with the discharge limitations for Lead, Zinc and Cyanide, Chemical Compounds shall retain the services of a qualified environmental consultant who shall evaluate its existing wastewater pretreatment system and make necessary recommendations for the purposes of controlling and eliminating discharges in excess of the Lead, Zinc and Cyanide discharge limitations of the Permit.
- (c) In no event shall final compliance with the discharge limitations for Lead, Zinc and Cyanide be extended past April 1, 1995.

Progress Reports

3. Chemical Compounds shall submit to the PVSC monthly progress reports concerning its compliance with the requirements and obligations of this Order.

- 3 -

Final Report

4. Within ninety (90) days of completing the corrective action described in paragraph #2, the defendant shall submit to the PVSC a final report concerning its compliance with all applicable pretreatment standards.

Force Majeure

The completion date for the corrective action described in paragraph #2 or for the submission of any report required by this Order, shall be extended for the period of time that the defendant or its agent is prevented by a Force Majeure event from proceeding with the corrective action or submitting the required report. As used in this Order, a Force Majeure event shall mean an event which is beyond the reasonable control of the defendant including, but not limited to, such events as fire, explosion, inclement weather conditions (that create unforeseen delays), labor disputes, inability to obtain or unavoidable delay in the delivery of materials, inability to obtain or unavoidable delay in securing municipal approvals and/or work permits, inability to obtain or unavoidable delay in securing State approvals and/or Treatment Works Approval and unforeseen subsurface conditions. occurrence of a Force Majeure event causes or may cause delay in meeting any completion or submission date set forth above, defendant shall notify the PVSC in writing within ten (10) days of the occurrence of such event, the precise cause of the delay, the measures taken or to be taken by the defendant to prevent or minimize the delay, an estimate of the date by which such measures

- 4 -

will be completed or such report will be submitted, and an estimate of the duration of the delay. The defendant shall promptly implement all reasonable measures to prevent or minimize any such delays, prevent or minimize any adverse impact on the PVSC system as a result of such delays, and to comply with all requirements of this Order as soon as possible;

6. If the PVSC finds that: (a) the defendant has complied with the notice requirements of the preceding paragraph and; (b) the delay or anticipated delay has been or will be caused by a Force Majeure event, the PVSC shall extend the time for performance under this Order no longer than the delay resulting from the Force Majeure event. If the PVSC determines that: (a) the defendant did not comply with the notice requirements of the preceding paragraph or; (b) the event causing the delay does not constitute a Force Majeure event, failure to complete the corrective action under paragraph \$2 or to submit any report required hereunder shall be a violation of the requirements of this Order and subject the defendant to sanctions under the applicable statutes and regulations. The burden of establishing that any delay is caused by a Force Majeure event rests with the defendant;

General Provisions

7. The corrective action undertaken by the defendant pursuant to this Order shall constitute the penalty for any violations of the Categorical Pretreatment effluent limitations promulgated at 40 C.F.R. § 414 during the period covered by the compliance schedule. In the event that the defendant completes all

- 5 -

corrective action on or before the completion dates set forth in the compliance schedule, and as modified by any Force Majeure event, any such exceedances experienced during this period shall not be subject to additional penalty.

- 8. The defendant further understands that any exceedance of the effluent limitation for discharges of Lead, Zinc and/or Cyanide experienced after the final completion date set forth in the compliance schedule, shall be subject to further enforcement proceedings and civil penalties.
- 9. Nothing in this Order shall preclude the PVSC from taking enforcement action against the defendant for matters not set forth herein or in the complaint.
- 10. All provisions of the Permit shall remain in full force and effect and are not modified by this Order. The defendant expressly understands that the compliance requirements contained in this Order do not modify any provisions of the Permit or any duties or liabilities of the defendant thereunder.
- 11. This Order shall be binding on the defendant, its assignees and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 12. Defendant shall perform all work conducted pursuant to this Order in accordance with prevailing professional standards.
- 13. This Order shall not relieve the defendant from obtaining and complying with all applicable federal, state and local permits, as well as all applicable statutes and regulations while carrying out the obligations imposed by this Order.

- 14. The obligations and civil penalties of this Order are imposed pursuant to the police powers of the State for the enforcement of law and the protection of public health, safety, welfare and are not intended to constitute a debt or debts which may be limited or discharged in a bankruptcy proceeding.
- 15. In addition to the PVSC's statutory and regulatory rights to enter and inspect, the defendant shall allow the PVSC and its authorized representatives access to its facility at all times for the purpose of monitoring defendant's compliance with this Order;
- 16. The defendant shall make available to the PVSC all technical records and contractual documents maintained or created by the defendant or its contractors in connection with this Order.
- 17. The PVSC reserves the right to require the defendant to take additional actions as authorized by law should the PVSC determine that such actions are necessary to protect human health, the environment or the PVSC system. Nothing in this Order shall constitute a waiver of any statutory right of the PVSC to require the defendant to undertake such additional measures should the PVSC determine that such measures are necessary, subject to the defendant's rights under this Order, applicable statutes and regulations.
- 18. The defendant shall not construe any informal advice, guidance, suggestions or comments by the PVSC or by person(s) acting on behalf of the PVSC, as relieving the defendant of its obligation to obtain written approvals as may be required herein, unless such advice, guidance, suggestions or comments by the PVSC

- 7 -

shall be submitted in writing to the defendant.

- 19. The defendant shall give written notice of this Order to any successor in interest prior to transfer of ownership of the facility which is the subject of this Order and shall simultaneously verify to the PVSC that such notice has been given.
- 20. No modification or waiver of this Order shall be valid except by written amendment duly executed by the defendant and the PVSC.
- 21. The Court shall retain jurisdiction over the parties to this action solely for the purpose of enforcing the provisions of this Order.
- 22. The PVSC reserves the right to reopen this case in the event the Commissioners of the PVSC, at their next available public meeting, do not accept the recommendations of the chief counsel to enter into this Consent Order and Final Judgment.
- 23. This Order does not constitute, nor shall it be used as evidence of the findings of any fact or the admission of any facts, fault or liability on the part of the defendant, nor shall any of the alleged violations settled herein be utilized in any way as prior violations for the purposes of characterizing any other violations, alleged or actual, existing or hereinafter committed.

Hon. Harry A. Margolis, P.J.Ch.

- 8 -

The undersigned hereby consent to the entry of the foregoing order, both as to substance and form.

GABRIEL M. AMBROSIO, ESQ.

Dated: :///94

John T. Ambrosio, Esq. Attorneys for the PVSC

CHEMICAL COMPOUNDS, INC.

Dated: 1//29/94

Authorized Signature

ALBERTO CELLENI

Print Name

PRESIDENT

Print Title & Position

JTA:ja Chemical Compounds.con

- 9

VIOLATION NOTICE HAZARDOUS MATERIALS REGULATIONS

CITY CF NEWARK FIRE DEPARTMENT

1010 18th Ass. Newark, N.J. 07108 (201) 733-7495

NOTICE OF VIOLATION AND ORDER TO TERMINATE	☐ NON C	OMPLIANCE	COURT A	CTION REQUIRED
ET ENEUTICATION SECRET				4
LOCATION: 29 Riverside Avenue		Block:		*
OWNER: Name Chemical Compounds Address 29-75 Riverside Avenuer Town/State/Zip Newark, NJ 07104 "Hid" Permit #:		AGENT: Name Harold Address 29-75 I Town/State/Zip Net	Riverside Ave	nue 04
			.	
CACION BEACHESTE				
DATE OF NOTICE: COMPLIA	INCE DUE DATE:	DA	TE OF INSPECTION:	
TAKE NOTICE that you have been found 21, 1990) governing hazardous material Section 8.4	s:	:		
Section 10.1 B				
Section 12.2		• .		
Section 15.1	•			
Section 18.4				
II you have any questions concerning this	mattor, please	call: <u>(201) 733 - 7495</u>	1.00	
Inspector	ale	Hazmat Officer	1	Date
Officer in Charge Fire Prevention & Sa	fely	Received by:		Date

NEWARK FIRE DEPARTMENT

OFFICE OF HAZARDOUS MATERIALS 188 Mulberry Street Newark, New Jersey 07102

STANLEY J. KOSSUP

(201),733-7506

Fax (201) 733-7468

Chemical Compounds 25-75 Riverside Avenue Newark, NJ 07104

January 10, 1992

attn: Mr. Harold Sullivan

On January 7, 1992, the Newark Fire Department's Hazardous Materials Unit responded to your facility, Chemical Compounds at, 29 Riverside Avenue. The complaint regarded unidentified liquid flowing from a hose line on the second floor of your building, down a set of exterior mairs, onto the ground and into the Passaic River.

This action is a violation of the City of Newark's Hazardous Materials Regulations. You are in violation of the following:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spilled hazardous materials.

Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

On January 7, 1992, you or one of your employees disconnected a hose line leading into the recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected at into the Passaic River.

Section 10.1b It shall be unlawful to use or operate any bulk storage area or part thereof without:

(b) providing for the segregation of potentially reactive chemicals which materials or which may react so as to form hazardous materials, and which present or cause a hazardous or dangerous condition.

It was noted that oxidizers, (M & T Chromic Acid) are stacked on top of corrosives. (Ethylene Cholorhydrin)

Section (2.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

An unqualified person disconnected the hose leading to the waste container. If the person was qualified he would have been required to know that the product he was discharging onto the ground was hazardous.

Section 15.1 In the event of fire, explosion, structural failure, leakage or other discharge relating to hazardous materials requiring notifications under Federal or State law, the permit holder shall also notify the Director.

The permittee shall submit to the Director within ten days a copy of the written report pursuant to the Hazardous Substance Discharges: - Reports and Notices Act, N.J.S.A. 13:1K-15, and regulations promulgated thereunder.

The permittee shall also provide information to the Director relating to the ability of the permittee to contain and dispose of the hazardous material, the estimated time it will take to complete storage and disposal, the degree of hazard created and the quantity and type of material released. The Director may verify that the hazardous material is being contained and appropriately disposed.

The appropriate agencies were not notified when the spill, leak or discharge occurred. Stivate citizen reported this incident to the State Police.

- Section 17.1c Failure to abate, correct or rectify any noncompliance with the provisions of these Regulations any permit conditions or any provisions of the Hazardous Materials Management Plan with the time specified in the Notice of Noncompliance;
- Section 17.3 If the cause of the noncompliance is not abated, corrected, or rectified within the time specified in the Notice of Noncompliance, a Notice of Violation shall be issued.

The Notice of Violation shall be in writing and shall include a reference to the original Notice of Noncompliance, the unconditional right to a hearing and the remedial action to be undertaken.

- Under conditions of imminent hazard the Director may issue a Notice of Violation without issuing a Notice of Noncompliance.
- Section 17.4 A request for a hearing by the permittee shall be given to the Director in writing, setting forth in particular any defense the permittee might have in regard to the alleged violations, and a brief statement of the factual matters in support thereof. The notice of the hearing date shall be given by the Director at least ten (10) days prior to the hearing date.
- Section 18.4 Every Permit holder shall insure that a qualified person shall be in charge at all times and at each and every place where hazardous materials operations are carried out. The qualified person shall remain on the premises as long as the manufacture, use processing, or handling of hazardous materials is being carried out and shall return to the premises when required under emergency circumstances. To be a qualified person, the individual shall be knowledgeable in the chemical and physical processes utilized by the Permit holder.

The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow the holder to pass through any manned emergency barricades and enter the permittee facility in the event of an emergency.

The person who placed the hose leading from the building to the ground and into the river did not remain on the premises.

Section 20.2 Whenever in these Regulations any act is prohibited or is made or declared to be unlawful, or whenever in these Regulations the performance of any act is required or the failure to perform any act is made or declared to be unlawful, the commission of any such prohibited act or the failure to perform any such act, shall be punished by a fine or not more than \$1,000.00 per day per violation or by imprisonment for a term of not more than 90 days, or by any combination of such fine and imprisonment. Each day any violation of these Regulations continues shall be considered a separate offense.

You have been found to be in violation of five sections of the City of Newark's Hazardons Materials Regulations.

Battalion Chief A. Apostolico

"AA:lm

NEWARK FIRE DEPARTMENT

Office of Hazardous Materials 188 Mulberry Street Newark, NJ 07102

Stanley J. Kossup Director/Fire Chief

(201) 733-7506

Fax (201) 733-7468

Chemical Compounds, Inc. 29 Rivèrside Avenue Newark, NJ 07104

January 31, 1992

attn: Mr. Harold Sullivan

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On January 31, 1992, a reinspection was conducted at your facility on 29 Riverside Avenue. The purpose of this was to check on the violations issued on January 10, 1992. The conclusions of this reinspection are as follows:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spitled hazardous materials. Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

THIS VIOLATION HAS BEEN ABATED.

All internal drains in the building from the first floor have been re-piped, enabling them to drain into a 1,000 gallon tank located on the ground floor. After the material has been PH tested, it is pumped into a hazardous waste trailer.

Section 10.1b providing for the segregation of potentially reactive chemicals which are hazardous materials or which may react so as to form hazardous materials, and which reaction may present or cause a hazardous or dangerous condition.

THIS VIOLATION HAS BEEN ABATED.

The oxidizers, M & T chromic acid, have been relocated to a different location and are no longer stacked on top of corrosives, ethylene cholorhydrin.

Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

THIS VIOLATION HAS BEEN ABATED.

Mr. Sullivan explained that his employees have been trained on the unloading and transfer of hazardous materials. Mr. Sullivan also stated that in the event of a leak, spill or accident his employees will know what to do. I instructed Mr. Sullivan to send me a letter documenting this, to which he agreed:

Mr. Sullivan was also informed that flammable liquids with a flammable rating of three or more should be stacked no more than two drums high, as we found three drums stacked on top of each other in the front of the building during our reinspection.

Battalion Chief Anthony Apostolico

AA:lm

FIELD NOTICE	OF VIOLATIONS
A CONTRACTOR	DATE 01/07/92
CASENO 9250F07F1025	the state of the s
CASE NAME CHEMICAL COMPOUNDS	TVC TLLEGAL DUMPTNOS
EINCIDENT LOCATION PASSAIC RIVER	STORE AND STRANK
RESPONSIBLE PARTY ADDRESS CHEMICAL	COMPOUNDS
RESPONSIBLE FANT 29-75 River	rside Ave. Nepark N.J. 127104
The state of the s	19、19、19、19、40、19、19、19、19、19、19、19、19、19、19、19、19、19、
RESPONSIBLE PARTY REPRESENTATIVE AL (scur 1 / 11/1/varp our grant
You are hereby NOTIFIED that during an investigation by DE	P on the above date, the following violations of New Jersey
Statute and/or Regulation were observed. This violation has	been recorded as part on a permanent emolecular that formal enforcement
file. In addition, this case is being forwarded to the appropria	ILE DIVISION WITH A RECOMMENDATION UND TOTAL CHINAL CHINAL
action be taken.	
X NJSA 58:10-23.11 <u>C</u> . <u>e</u>	SPILL COMPENSATION AND CONTROL ACT
∑ NJSA 23:5-28	POLLUTION AND OBSTRUCTION OF WATER
NJAC 7:26—	HAZARDOUS WASTE REGULATIONS
L Nono 120	
THE RESERVE OF THE PROPERTY OF	
	TRACE LANGE
DESCRIPTION OF VIOLATION Discharge & wh	hoteliation of a discharge of a hatelet
substance into the waters and cato	the land of the State of N.J.
- *** C. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	Snill Commentation and Control
CANDEL CLASSIA	
Within 'must hir days of receipt of this notice, you shall s	submit in writing, to the address and investigator indicated
below, an account of the incident and corrective measures to	aken to attain compilance.
	vestigator Natthew & Garamone
Ad	dress NOVE/E-Emtremy Keyler Cons
	A PACIFIC INNER THE PACIFIC OF
COPIES WHILE ILL School in	minipation lands Responsible Parts



State of New Jersey Department of Environmental Protection and Energy

Division of Responsible Party Site Remediation

Metro Regional Office 2 Babcock Place West Orange, NJ 07052 Tel. # 609-669-3955 Fax. # 201-669-3993

Scott A. Weiner Commissioner

Kari J. Delaney Director

Chemical Compounds Inc. 29-75 Riverside Avenue Newark, NJ 07104 Attn: Alberto Celleri

February 26, 1992

Dear Mr. Celleri,

The New Jersey Department of Environmental Protection and Energy is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq. to collect all costs associated with a discharge and incurred by the State in the removal of hazardous substances or mitigation of damages. Accordingly, oversight costs (salary, materials and indirect costs), in the amount of \$708.60 were incurred by the Department when the Bureau of Emergency Response responded to an illegal dumping of acetic energency Response responded to an illegal dumping of the ground and the acid/anhydride which resulted in contamination of the ground and the Passaic River on 1/7/92 in Newark, Essex County. DEPE case number 92-01-07-1025.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge. Your payment of this amount merely satisfies the Bureau's interest in recovering its actual costs of the above referenced response action.

You must submit a check to the Department payable to the "Treasurer, State of New Jersey" within 30 days after receipt of this notice. Please send your check and the white copy of attached form DEP-062A to:

> New Jersey Department of Environmental Protection & Energy Bureau of Revenue CN 417 Trenton, NJ 08625-0417

You may contact Walter Janicek of the Bureau of Emergency Response at 201-669-3955 if you have any questions or require further information. Market Skill St. M.

Very truly yours,

stanley Delikat

845340113

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-114	here if Revised Billing	ENFORCEMENT IN	IVOICE	,	Document # Date Rec'd	
	RGENCY RESPONSE	TYPE: Tine/Penalty	Cost Recovery	FACILITY ID NO PROGRAM ID N	Amount 0. 192-01-07-	10:
Addre	Chemical Cor spi29-75 River Newack, NJ	07104			industrial 3	· ·
<u>Assessed</u>	•	DESCRIPTION Section 11 Control (1) (1) (1) (1)	tot garmet		AMOUNT	
2/7/92	ADMINISTRATIVE	COST RECOVERY	•		\$708.60	

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY BUREAU OF EMERGENCY RESPONSE ADMINISTRATIVE COST RECOVERY WORK SHEET

PROJECT ACTIVITY # TFF

CASE I.D.NO. 92-01-07-1025-33 Chemical Compounds Case Name: COST CALCULATION: \$708.60 OVERTIME REGULAR HOURS AMOUNT RATE AMOUNT HOURS RATE DATE RESPONDER 208.80 52.20 4.0 M. Garamone 1/7/92 182.70 52.20 C. Gibbons 1/7/92 104.40 (Report) 52.20 Garamone 1/9/92 52.20 52.20 1.0 M. Garamone 1/8/92 130.50 M. Garamone 1/9/92 52,20 678.60 Total

Equipment:

٠..

⁴ Drager Air sampling tubes - (Acetic Acid) - 4 x 7.50 ea/ = \$30.00

Subpoena Buces Tetum Superior Court of New Jersey

State of New Tersey	
County of Mercer	
Custodian of Records Chemical Compound, Inc. 29-75 Riverside Avenue Newark, NJ	•
TO:	R.J. Hughes Justice Complex
You are hereby commanded to appear a	e 25 Market St., 4th Iloor
	Friday January 24th at 11:30 AM
in the City of Trenton	•
_	y and you are ordered to appear without prepayment
of witness fee and bring with you the followi	ng records:
See Attached	Schedule "A"
•	
If you fall to appear and produce the	raid records, a warrant may be issued for your arrest
and you may be charged with contempt.	
	D. Lenox, Jr., Judge of the Superior Court,
•	
this 13th day of January	, 19 92
	•
60 CO CO	
	Chush thele
	onald F. Phelan
	CELTING Clerk of the Superior Court
	120000
000000000000000000000000000000000000000	ames W. Classen, DAG
, (`	609) $984-4470$ on $1/13/92$ and on $1/14/92$
Received this subpoena at Icanton	
129.75 Rueraide Mrs Arwach	. I served it on the within named Harald Sullivan
by delivering a copy to h im.	4
	D 1 1 -1 0-22
Date 1/14/92	fem & Kissel 110
•	Stenature and Title
•	Sifterate our sign

Custodial of Records Chemical Compound, Inc. 29-75 Riverside Avenue Newark, NJ

SCHEDULE A

- 1. In answer to this subpoena, the records shall:
 - a. Be delivered in the same condition and order as they are kept in the ordinary course of business:
 - a complete inventory shall accompany the records as to exactly what records are contained in each carton or envelope; and
 - c. the records shall be delivered in a secured carton or envelope as to protect the records and keep them in proper, order.
 - The term "document" shall mean any ORIGINAL WRITING . (handwritten, typed or otherwise reproduced) formal or informal, in your possession, custody, or control, regardless of where located and includes, but is not limited to, contracts, agreements, communications, letters, telegrams, regulations, memoranda, surveys, studies, summaries, reports, manifests, brokerage agreements, bills of lading, test analysis results, notices, announcements, transcripts, field notes, weigh tickets, telephone memoranda, purchase orders, instructions, charges, manuals, brochures, photographs, schedules, price lists, messages, records, invoices, tape recordings, notes of interviews or communications, calendar entries, records of meetings, applications, newspaper and advertisements, video tapes, information retrieval systems, and any other method of electronic storage, and material prepared for circulation to any past or present division, affiliate, officer, director, employee or agent. In all cases where originals are not available "documents" also mean copies of original writings and non-identical copies thereof.

Without limitation of the term "control" as used in the preceding sentence, a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another source or public or private entity having actual possession thereof.

 All documents reflecting the procedures or instructions for operating the centrifuge located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building \$17.

- All documents reflecting the procedures or instructions for the cleaning and draining of the centrifuge located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building #17.
- 4. All documents or records reflecting the Chemicals or other substances which were either mixed in, processed by, or used in the centrifuge (located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building \$17) between December 1, 1991 and on or before January 7, 1992. Also included in this demand are documents reflecting the schedule that this unit is cleaned, including the date immediately prior to January 7, 1992.
- 5. All documents reflecting the disposal of waste for the period December 1, 1991 to January 8, 1992.
- 6. All documents pertaining to discharges from Chemical Compound, Inc. or any of it's facilities, into the Passaic Valley Sewerage Authority, including but not limited to analysis, correspondence and operating procedures.



State of New Jersey

DEPARTMENT OF LAW AND PUBLIC SAFETY

DIVISION OF CRIMINAL JUSTICE

ROBERT J. DEL TUFO

CN 085
RICHARD J. HUGHES JUSTICE COMPLEX
TRENTON, NEW JERSEY 08825-0085
TELEPHONE: 609-964-6500

ROBERT T. WINTER

August 18, 1992

Jonathan H. Roth, Esq. 129 Washington Street P.O. Box 1779 Hoboken, NJ 087030

Dear Mr. Roth:

Enclosed please find copies of the draft Waiver of Indictment and Trial by Jury and Accusation prepared in accordance with your July 13, 1992 letter. Advise me if you have any changes and I will then file them and obtain a date with the Court for the plea.

The terms of the plea, pursuant to our recent discussions, are that Chemical Compounds, Inc. plead guilty to a fourth degree water pollution violation, N.J.S.A. 58:10A-10f(3), as contained in the enclosed. The State will accept a fine of \$5,000 for the offense and Chemical Compounds, Inc. will provide a check in the amount of \$1,760.85 payable to the Office of the State Environmental Prosecutor to be used to purchase a one page advertisement in the Gloucester Times conveying a positive environmental message. The defendant will not be identified in the advertisement.

As soon as I determine from you that this is satisfactory, I will schedule a date with the Court.

Very truly yours,

James W. Glassen

JWG/dk Enclosure

845340119

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SUPERIOR COURT OF NEW JERSEY COUNTY OF ESSEX LAW DIVISION - CRIMINAL

STATE OF NEW JERSEY) WATUPE OF INDICAMENA AND
v.	WAIVER OF INDICTMENT AND TRIAL BY JURY
CHEMICAL COMPOUNDS, INC.)
	DS, INC., the above named defendant,
charged with unlawful disc	harge of a pollutant, contrary to
N.J.S.A. 58:10A-10f(3) and	N.J.S.A. 58:10A-6a, being advised
through its agents of the	nature of the charges against them
and of their right to indic	ctment and trial by jury, hereby
waives prosecution by indic	ctment and trial by jury and requests
to be tried by the Court.	_
Dated in Newark,	New Jersey, this day of
, 1992.	
•	
Signed and delivered in the presence of	CHINICAL COURSENING THE
in the presence of	CHEMICAL COMPOUNDS, INC.
• •	By:
Reported By:	Approved and accepted on this day of , 1992.
	in the presence of the
James W. Glassen	defendants and in open court.
Deputy Attorney General	
	The Honorable Judge of the Superior Court
	•
	845340120

SUPERIOR COURT OF NEW JERSEY COUNTY OF ESSEX LAW DIVISION - CRIMINAL

STATE OF NEW JERSEY)	ACCUSATION
v .)	•
CHEMICAL COMPOUNDS, INC.)	

CHEMICAL COMPOUNDS, INC. having been charged under oath with violating the Water Pollution Control Act and having in writing waived indictment and trial by jury and having requested that the Defendant be tried by Accusation by the Court, and the request having been granted;

DEPUTY ATTORNEY GENERAL JAMES W. GLASSEN, for the State of New Jersey, alleges that

COUNT ONE

(Unlawful Discharge of a Pollutant - Fourth Degree)
CHEMICAL COMPOUNDS, INC.

on or about January 7, 1992, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did negligently discharge a pollutant into a municipal treatment works, namely the Passaic Valley Sewerage Commission sewer system in the area of 29-75 Riverside Avenue, Newark, without possessing a valid industrial pretreatment permit issued by the Passaic Valley Sewerage Commission, that is, CHEMICAL COMPOUNDS, INC. did negligently release, spill, leak, pump, pour, emit, empty or dump into the Passaic Valley Sewerage Commission sewer system, which leads to the Passaic

Valley Sewerage Commission sewage treatment works, which then flows into waters of the State, a pollutant, namely industrial wastes, without possessing an industrial pretreatment program permit issued to CHEMICAL COMPOUNDS, INC. by the Passaic Valley Sewerage Commission, contrary to the provisions of N.J.S.A. 58:10A-10f, N.J.S.A. 58:10A-6a, and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

ROBERT J. DEL TUFO ATTORNEY GENERAL OF NEW JERSEY /

By:

James W. Glassen

Deputy Attorney General

- 2 -

LAW OFFICES

JONATHAN H. ROTH 129 Washington Street P.O. Box 1779 Hoboken, New Jersey 07030

JONATHAN H. ROTH

Admitted in NJ, NY, MA

(201) 792-0870 Fax: (201) 659-1088 Of Counsel

MARISA Y. PARADISO

Admitted in NJ, NY, CO

August 28, 1992

Mr. Harold E. Sullivan, President Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, New Jersey 07104

Mr. Alberto Celleri Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, New Jersey 07102

Damon R. Sedita, Esq. Schwartz, Tobia & Stanziale 22 Crestmont Road Montclair, New Jersey 07042

RE: State of New Jersey v. Chemical Compounds, Inc./Draft Waiver of Indictment and Trial by Jury and Accusation

Gentlemen:

I enclose herewith correspondence from James W. Glassen, D.A.G. in addition to Draft Waiver of Indictment and Trial by Jury and Accusation. Kindly review the same and provide me with the benefit of your comments and/or questions as soon as possible. The terms of the plea are set forth in Mr. Glassen's letter and are as follows:

- Chemical Compounds, Inc. will plead guilty to a 4th Degree water pollution violation under N.J.S.A. 58:10A-10f(3) as contained in the enclosed;
- 2. Chemical Compounds, Inc. will pay a \$5,000 fine and \$1,760.85 for an environmental advertisement in the Gloucester Times.

THE LAW OFFICES OF JONATHAN H. ROTH

Mr. Harold E. Sullivan, President Mr. Alberto Celleri Damon R. Sedita, Esq. August 28, 1992 Page 2

I look forward to hearing from you.

Very truly yours,

Jonathan H. Roth

JHR:slk Encs.

CHEMICAL COMPOUNDS, INC. 2976 RIVERSIDE AVENUE NEWARK, NJ 07104	6235
RETAIN, NO OTTO	September 9 19 92 130
PAY TO THE ORDER OF NO. Five thousand and 00/00	\$ 5, 000.00
Five thousand and 00/00	DOLLARS
FIRST First Fixed y Shark, No. A Now Jarrey Executive Office 130 50 Brand Street Newark, N.J. 97192	acelling
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#*************************************	17286 In

CHEMICAL COMPOUNDS, INC. 2976 RIVERSIDE AVENUE	6236
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FOR	

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State of New Jersey Department of Environmental Protection and Energy Division of Responsible Party Site Remediation CN 028

Trenton, NJ 08625-0028

Jeanne M. Fox Acting Commissioner Karl j. Delaney Director

November 30, 1993

Chemical Compounds Inc. 29-75 Riverside Avenue Newark, NJ 07102

Attn: Alberto Celleri

Dear Mr. Celleri,

The New Jersey Department of Environmental Protection and Energy is authorized, pursuant to the New Jersey Spill Compensation and is authorized, pursuant to the New Jersey Spill Compensation and is authorized, pursuant to the New Jersey Spill Compensation and is authorized, N.J.S.A. 58:10-23.11 et seg. to collect all costs Control Act, N.J.S.A. 58:10-23.11 et seg. to collect all costs costs control Act, N.J.S.A. 58:10-23.11 et seg. to collect all costs control Act, N Inc. on 10/5/9 93-10-05-1110.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have under the law, including responsibility for damages which may have been caused by the discharge. Your payment of this amount merely been caused by the Bureau's interest in recovering its actual costs of the satisfies the Bureau's interest in recovering its actual costs of the above referenced response action.

You must submit a check to the Department payable to the "Treasurer, State of New Jersey" within 30 days after receipt of this notice. Please send your check and the white copy of attached form DEP-062A to:

New Jersey Department of Environmental Protection & Energy Bureau of Revenue CN 417 Trenton, NJ 08625-0417

You may contact Walter Janicek of the Bureau of Emergency Response at 201-669-3955 if you have any questions or require further information.

Sincerely,

Stanley/Delikat, Chief Bureau of Emergency Response

845340127

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· · · · · · · · · · · · · · · · · · ·	New Jersey Department of Environm	nental Protection and	Energy	Date Rec'd
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Vir Jonathan Roll

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY BUREAU OF EMERGENCY RESPONSE ADMINISTRATIVE COST RECOVERY WORK SHEET

PAC # V35R

CASE # 93-10-05-0736 CASE NAME: Chemical Compounds

93-10-05-1110

COST CALCULATION: \$866.47

RESPONDER	Date	REGULAR RATE	HOURS	AMOUNT	O.T. RATE	HOURS	AMOUNT
B. Doyle	170/5/93	64.43	3.0	193.29	104.03	0.5	52.01
J. Hoyle	10/5/93	60.66	3.0	181.98	97.95	0.5	48.97
					`		
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O.T. Total = 100.98 Reg. Total = 375.27

REPORT:

64.43 4.0 257.72 B. Doyle > 10/5/93

Report Total = 257.72

EQUIPMENT:

Amount . Item: 75.00 HazCat 50.00 OVA 7.50 Drager Tubes

Equipment Total = 132.50

TOTAL AMOUNT DUE = \$866.47

FWE-009

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New Jersey Department of Environmental Protection and Energy Division of Facility Wide Enforcement Metro Bureau of Water & Hazardous Waste Enforcement 2 Babcock Place, West Orange, N.J. 07052 (201) 669-3900



NOTICE OF VIOLATION

ID NO. ND 108661737	DATE SEP. 14. 94
NAME OF FACILITY CHEMICAL	COMPOUNDS, Inc
LOCATION OF FACILITY 29-75 Rive	ERSIDE AV. NEWARK N.J. U7104
NAME OF OPERATOR ALBERTO	CELLERI - PRESIDENT
You are hereby NOTIFIED that during my insp	ection of your facility on the above date, the following
alleged violation(s) of the Solid Waste Manage	ement Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations
/N.I.A.C. 7:26-1 et seq.) promulgated thereun	der were observed. These violation(s) have been recorded
as part of the permanent enforcement history of	
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DESCRIPTION OF VIOLATION P) A	c7.26-9.3(a)3-no
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Remedial action to correct these violations mu	st be initiated immediately and be completed by
	in titteen (15) days of receipt of this Notice of Violation, you
shall submit in writing, to the investigator issuit	ng this notice at the above address, the corrective measures
	ance of this document serves as notice to you that a violation
has occurred and does not preclude the State	of New Jersey, or any of its agencies from initiating further
	g penalties, with respect to this or other violations. Violations
of these regulations are punishable by penalti	es of up to \$50,000 per violation.
(11818My	Botheron hocher
Facility Receipt of Copy Only	Investigator, Division of Facility Wide Enforcement Department of Environmental Protection & Energy

FWE-009.⁷ 11/92

New Jersey Department of Environmental Protection and Energy Division of Facility Wide Enforcement Metro Bureau of Water & Hazardous Waste Enforcement 2 Babcock Place, West Orange, N.J. 97052 (201) 669-3900



NOTICE OF VIOLATION

ID NO. 108661-737 DATE SEP. 14. 94
NAME OF FACILITY CHEMICAL COMPOUNDS, INC.
LOCATION OF FACILITY 29-75 RIJERS, DE AV. NEWARK, MJ 01104
NAME OF OPERATOR ALBERTO CELLERI - PRESIDENT
You are hereby NOTIFIED that during my inspection of your facility on the above date, the following
alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations
(N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded
as part of the permanent enforcement history of your facility.
DESCRIPTION OF VIOLATION PACT: 26-9. 61/1- hiling to funitionize local anthorities 19. 61/13-no ogreements with emergency controcion 9. 61/14- filing to formitiarize local that the 9 (11) 5- 100 file in pachana
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Remedial action to correct these violations must be initiated immediately and be completed by CCT. 14. 94
Enables Referred Copy Only Investigator, Division of Facility Wide Enforcement
Facility Receipt of Copy Only Department of Environmental Protection & Energy
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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section

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Generator's Name and Melling Address CHPINICAL COMPOUNDS - 2975 RIVERSONS BLOS /7 - NEWARK, VI 7104 4. Generator's Phone (2011) 495 - 22.7 5. Transporter 1 Company Name FRECHOLD CHRINE INC. NITU US 71/2 7. Transporter 2 Company Name 8. US EPA IO Num 9. Designated Facility Name and Site Address COFFO - 27750 PATHIEUR 7. TWO ID US EPA IO Num	nber G 12 "f nber	B. State Ger	A (0)	765131
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15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are proper shipping name and are classified, packed, marked, and labeled, and are in all respects according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume are economically practicable and that I have selected the practicable method of treatment, storage, or future threat to human health and the environment OR, if I am a small quantity generator, I have rethe best waste management method that is available to me and that I can afford.	in proper cond and toxicity of wa ridisposal curre	dition for fransj iste generated ! intiv available to	part by highway to the degree i m i me which minin	ave determined to be nizes the present and
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SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

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19. Discrepancy Indication Space

20. Facility Owner or Operator, Certification of recent or hazardous manerials covered by this refinitest except as noted in transit 8.

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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on eilte (12-pitch) typewriter.) 1: Generatore US EPA ID No. 5: (73) THE MENTION OF THE PROPERTY OF THE PROPERT UNIFORM HAZARDOUS WASTE MANIFEST Generator's Name and Meiling Address AL COMPOUNDS FOR occurred in and the M.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 293-7172 (Night) Generator's Phone (20% D0191912103161 WA Te Designated Facility Name and Site Address EM SA- Waste Strongs. G SHIP FACILITY'S ID M 7/0/0/9/7/2//16/7/9/0 the county service of post of the J.J. C.7705 12 Containers - 13. Total 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Quantity No. а. 50000 b. 2. d, Wastes Listed Above in case of an emergency or spill immediately call the state the emergency (# EMERGEN CV GENERATOR'S CERTIFICATION; I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and shuman health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select a meanagement method that is available to me and that I can afford. Month Day 021197 Transporter 1 Acknowledgement of Receipt of Materials Month Day 18. Transporter 2 Acknowledgement of Receipt of Materials Month Day Year Signature Printed/Typed Name 19. Discrepancy Indication Space SIGNATURE AND INFORMATION MUST BE DEGIBLE ON ALL COPIES EPA Form 8700-22 (Rev. 9/88) Previous



State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625 signed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039- Expires 9:

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State of New Jersey
Department of Environmental Protection:
Division of Hazardous Waste Management
Manifest Section
CN/028, Trenton, NJ 08625
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State of New Jersey

Department of Environmental Protection

Division of Hazardous Waste Management

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028 Trenton N.108625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management 7 Manifest Section CN 028, Trenton, NJ 08625 for use on eitte (12-pitch) typewriter.)

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625 as on eithe (12-pitch) typewriter.)

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CHEMICAL COMPOUNDS INC.		₹N.I	A 0989034
4. Generator's Phone () 21) 495 - 32/17	EWAKK NG	B. State Gener	ator's ID
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 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment a proper shipping name and are classified, packed, marked, and labeled, and are in all respect 	re fully and accur	ratery described ac	ove by
if I am a large quantity conserver. I certify that I have a program in place to reduce the volume			
economically practicable and that I have selected the practicable method of treatment, storage, future threatro human health and the environment; OR, if I am a small quantity generator, I have the best wester management method that is available to me and that I can afford.			
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19. Discrepancy Indication Space	·		
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20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this m	anifest except as	noted in Item 19.	,
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State of New Jersey Department of Environmental Protection

Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625 Form Approved. OMB No. 2050-0039. Expires 9-30-9 Please type or print in block letters. (Form designed for use on eitle (12-pitch) typewriter.) information in the shaced areas is not required by Federal UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator's US EPA ID No. Mandest 2. Page 1 Document No Manifest Document Number A. Sin Generator's Name and Marting Address 0969033 CHEMICAL COMPOUNDS INC. B. State Generator's ID 29-75 RIVERSIDE AVE, BLDG.17, NEWARK, NJ 07104 Generator's Phone (201) 485-3212 US EPA ID Number SAME Transporter 1 Company Name C. State Trans. ID Transporter 2 Company Name D. Transporter's Phone (E. State Trans. ID --Designated Facility Name and Site Address EPA ID Number F. Transporter's Phone CHEMICAL WASTE MANAGEMENT OF NEW JERSEY LIK. G. State Facility's ID 100 LISTER AVE. H. Facility's Phone (MPWARK 13. Total 12. Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Waste No. Quantity No. NON-HADARDOUS DYE WASHWATER TODA NOT REGULATED BY ni dosand Ç, J. Additional Descriptions for Materials Listed Above 7
2.21-[[4-2[Eydroxyethyl] Aminol-2-Nitrophenyl] Imino] Diethanol K. Handling Codes for Wastes Listed Above HC-BLUE NO. 2 THIS IS A HAIR DYE 15. Special Handling Instructions and Additional Information WASTE PROBILE NO. K-32525 34070 WORK CROSE NO. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by procer shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the oracticable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Month Day Signature Printed/Typed Name ne nice on BAROLD B. GULLIVAN 17. Transporter 1 Acknowledgement of Receipt of Materials Wonth Day Signature Printed/Typed Name NATIONS (水) 18. Transporter 2 Acknowledgement of Receipt of Materials Month Day Yea Signature Printed/Typed Name 19. Discrepancy Indication Space 845340149 日 13 Amend Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item, 19 20. Facility Owner or Manth Signature

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EPA Form 6700-22 (Rev. 9/88) Previous editions are obsole 3 - TSD MAIL TO - GENERATOR

TIERRA-B-004571

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

8 - GENERATOR COPY

State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625 Aype or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

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SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

and the M.J. Dept. of Environmental Protection. (408) 282-5560 (Day) (409) 262-7172 (Mghl)

State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625 designed for use on eitte (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625 rs. (Form designed for use on eitle (12-pitch) typewriter.)

Form Approved. GM

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3 -- TSD MAIL TO - GENERATOR

State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section

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CN 028, Trenton, NJ 08625
Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-. information in the shaded areas is not required by Federa. law... 1. Generator's US EPA ID No. Manifest UNIFORM HAZARDOUS
WASTE MANIFEST Document No. of . TINITIONALE IN 131 State Manifest Document Number Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-7% RIVERSIDE AVE., BLDG.17, NEWARK, NJ07104 Protection, (609) 292-5560 (Day) (609) 292-7172 (Night) Generator's Phone (761 Transporter 1. Company Name TT. IDIA | 9| 9| 2| 0| 2| 6|8 ransporter 2 Company Name US EPA IO Number D. Transporter's Phone US EPA ID Number Designated Facility Name and Site Address OF MEN JESSEY, Inc. CHEMICAL WASTE MANAGEMENT F. Transporter's Phone (G. State Facility's ID 100 LISTER AVENUE NEWARK, NEW JERSEY 97105 MI JD 0 8 9 2 1 1 5 7 9 0 H. Facility's Phone (20+) 14. Unit Wt/Vot 13. Total 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Waste No. Quantity NON-HAZARDOUS DYE WASH WATER Ginitimize 01510101010 49CPR NOT REGULATED BY D Dept. of Env C. đ CONTAINS WATER — Additional Descriptions for Materials Listed Above 65% 10% AMMONIUM ACETATE AMMONIUM SULFATE 11% ACETIC ACID 145 103 15. Special Handling Instructions and Additional Information WORK ORDER NO.: A PROFILE NO. : DECAL NO.: 3 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and laceled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. distedy If I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and economically practicable and that have selected the practicable method of treatment, and a select that the degree I have determined to be economically practicable and that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically program in place to reduce the volume and toxicity of waste generated to the degree I have determined to the degree I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to the degree I have degree I have determined to the degree I have degree I Month Cay Year case of an emergency of Printed/Typed Name 125 13192 SULLIVAN BAROLD E. 17. Transporter 1 Acknowledgement of Receipt of Materials Month Day Year Printed/Typed Name 10501817: ACK 18. Transporter 2 Acknowledgement of Receipt of Materials Month Day Year Signature Printed/Typed Name 19. Discrepancy Indication Space 5073 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Month Day Signature Printed/Typed Name SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

3 - TSD MAIL TO - GENERATOR

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

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STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 8913 Little Rock, Arkansas 72219-8913
Telephone 501-562-7444

K	Telephone 501-562-7444			Form Ap	proved. OMB No	, 2050-0039. Exp	ires 9-30-94
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	3. Generator's Name and Mailing Address Chemical Compounds Attn: Pegg	y Schroeder		KRA	TO WILL		
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	4. Generator's Phone (201-485-1717 6.	. US EPA ID Number		30 - 40	290200	الدرونيد يبرون	
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	7. Transporter 2 Company Name 8.	US EPA ID NUMBH		Jeffere			
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	New Jersey Trailer ID# YETE SOOR 5	-					
	18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of classified, packed, marked, and labeled, and are in all respects in a classified, packed, marked, and are in a state regulations.	this consignment are fully	and accumb	ely descr	ibed above by proding to applicat	oper shipping nate international	ame and are and national
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	T 17. Transporter 1 Acknowledgement of Receipt of Materials	Signature		_		Mont	Day Year
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	16, Transporter 2 Acknowledgement of Receipt of Meterièle	Lationature				Mont	n Day Year
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	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered	by this manifest subspires noted	in item 10.			Mon	n Day Was
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N	NON-HAZARDOUS 1. Generator's US EPA ID No. WASTE MANIFEST 1. J. D1 .0 .8 .66 .1 .7 .37 0.65	2	Page 1 of 7			
Ā	3. Generator's Name and Mailing Address Chemical Compounders 29-75 Riverside Ave.	91				
	Newark, N.J. 07104 4. Generator's Phone (201) 485-3211 5. Transporter 1 Company Name 6. US EPA ID Number					
	Laidlaw Environmental Services M. DD 9 8 05 5 46 5 7. Tronsporter 2 Company Name 8. US EPA ID Number	- 3_				
	9. Designated Facility Name and Site Address 10. US EPA ID Number Laidlaw Environmental Services		Transport		301)953-9	1583
	3527 Whiskey Bottom Road Laurel, Md. 20724 M. DD 9 80 5 5 46 5	ı		953 - 95		
	11. Waste Shipping Name and Description		12. N	Containers o. Type	13. Total Quantity	14. Unit W1/Vol
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	D. Additional Descriptions for Materials Listed Above	E.	Handling (Codes for W	astes Listed Above	
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	In Case of Emergency contact: CHEM-TREC 1-800-					
	16. GENERATOR'S CERTIFICATION: I certify the moterials described above on this monifest are not subject to federal Printed/Typed Name ALBERTO CELLERI Signature		ns focurapor	ting proper d	Month Day	Yeor
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	19. Discrepancy Indication Space			0.45	240450	-
1	20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as no	- تا طريون	na 10 5	040 Seas	340159 <i>EC/7 COR</i> K	ACTE
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State of New Jersey Department of Environmental Protection and Energy Hazardous Waste Regulation Program Manifest Section CN 421, Trenton, NJ 08625-0421

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STATE OF ARKANSAS Department of Pollution Control and Ecology P. O. Box 8913 Little Rock, Arkansas 72219-8913 Telephone 501-562-7444

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State of New Jersey Department of Environmental Protection and Energy Hazardous Waste Regulation Program Manifest Section CN 421, Trenton, NJ 08625-0421

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State of New Jersey Department of Environmental Protection and Energy Hazardous Waste Regulation Program Manifest Section

CN 421, Trenton, NJ 08625-0421 Please type or print in block letters. (Form designed for use on silte (12-pitch) lypewriter.) Form Approved. OMB No. 2050-0039. Excites 9-3 UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Manufes WASTE MANIFEST information in the shaded areas 10110666117171 is not required by Federal law. 3. Generator's Name and Mailing Address Chemical Compounds, Inc. NJA 20280 29-75 Riverside Avenue (609) 292-7172 Newark, NJ 07104 B. State Generator's JD-(Gen: Site Active Generator's Phone (· Transporter 1 Company Name 6. US EPA ID Number C. Siate Trans. ID-NJDEPE 10 0.501 Jacum Touch Decal No. - 5010606 and Energy. Designated Facility Name and Site Address E. State Trans: ID-NUDEPÉ US EPA ID Number Decal No.-Research Oil Company F. Transporter's Phone (9) 2655 Transport Road G. State Facility's ID avelord, Oh H. Facility's Phone (216-) 523 11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, HM ID Number and Packing Group) Total Waste No. zeru en erkennerekenkelen keren kan en en en ntrenskyngenterkarkenskyn Hazardowa Waste Schie,n.c.s. (Calorecenzana), 40 40 11000 Dr and the N.J. 9, MA3077, PCILI, M. (EC21, POC2 C. Hazardous Waste Solid, n.o.s. X 9, NA3077, PGIII, PQ(D001) HBH) Whitenho 0.0.174 J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above RD 6126-11 E:G#31 Special Handling Instructions and Additional Information Imergency Response # 1-800-969-9252 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are GENERATOR'S CENTERIOR From: I neceuty became that the contents of this consignment are fully and accurately described agove by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national If it am a large quantity generator, I certify that I have a program-in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good fauth effort to minimize my waste generation and select ARTURO CEIL Month Day Transporter 1 Acknowledgement of Receipt of Materials HERBERT W. I Month Day JODG-E 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature 19. Discrepancy Indication Space 845340163 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Itemy-19. Month Day 14060 SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES 3-TSD MAIL TO-GENERATOR

(608) 292-7172 occurred in and the N.J. Dept. of Environmental Protection and Energy. å case of an emergency or apid immediately call the state

EPA Form 8700-22 (Rev. 9

3 - TSD MAIL TO - GENERATOR

State of New Jersey Department of Environmental Protection and Energy Hazardous Waste Regulation Program Manifest Section

CN 028, Trenton, NJ 08625-0028 tint in block letters. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-9-3 Mannest Document No. 1. Generator's US EPA ID No. information in the shaded areas UNIFORM-HAZARDOUS is not required by Federal law. WASTE MANIFEST A State Manifest Document Number A STATES Generator's Name and Mailing Address CHEMICAL COMPOUNDERS 29-75 RIVERSIDE AVENUE BUILDING 17 Generator's Phone (Transporter 1 Company Name NEWARK , Nus Epar Number DI SEPAID Number C. State Trans. ID Transporter 2 Company Name THIT E. State Trans. ID 3 354 US EPA ID Number 9. "Designated Facility Name and Site Address F. Transporter's Phone (). SYSTECH ENVIRONMENTAL G. State Facility's ID かめかり、そのかじ 11397 COUNTY ROAD 176 H. Facility's Phone 00 14.399-4833 7AULDING,OH 45079 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total Waste No. WtVc Quantity RQ, WASTE FLAMMABLE LIQUIDS, N.C.S. (HEPTENE XYLENE) .3 UN1993 PG II ь, 46 Hotens. A T K. Handling Codes for J. Additional Descriptions for Materials Listed Above DOMESTIC STATE OF THE STATE OF 2000 PROPELE / VAL 8590 PROPILES VALES SOL The state of the second 15. Special Handling Instructions and Additional Information PLATE- T312-MT LJ. EMERGENCY CONTACT: CHEMTREC 1-300-424-9300 CALLER MUST IDENTIFY VAN WATERS & ROGERS AS SHIPPER. GENERATOR'S CERTIFICATION: I hereby deciare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of wasts generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Month Day Year Signature Printed/Typed Name 08219 ARTURO (FLLERI 17. Transporter 1 Acknowledgement of Receipt of Materials Month Day Yess Printed/Typed Name 115/8/01 18. Transporter 2 Acknowledgement of Rece Month Day Signature 19. Discrepancy Indication Space 845340164 20. Facility Owner or Operator: Certification of receipt of hezardous materials covered by this manifest except as noted in Item 19. Month Day Year Printed/Typed Name PRICKE

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES



OCCUPATIONAL HEALTH SURVEY REPORT

PREPARED FOR:

Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, NJ 07100

CONDUCTED BY:

Joseph N. Capuzzi Occupational Health Specialist CIGNA Loss Control Services

ACCOMPANIED BY:

Mr. Arturo Celleri Safety Manager

DATE OF SURVEY:

October 3, 1995

845340166

PLEASE READ CAREFULLY

This company has undertaken a survey of your premises, equipment, or operations (whichever is pertinent to the type of insurance applied for or provided) for the purpose of supporting the function of risk underwriting. Any recommendation or information provided is not intended as a substitute for advice from a safety expert or legal counsel you may retain for your own purposes. It is not intended to supplient any legal duty you may have to provide a safe premises, workplace, product ar operation.

INTRODUCTION

On October 3, 1995 an Occupational Health Survey was conducted at the given location to evaluate employee exposure to various airborne contaminates. An executive summary and results of the survey follow.

The data presented in this report reflect conditions as they existed on the day of the survey on which the air sampling was performed. Information, as supplied by plant contacts was relied upon to help in developing conclusions and in the evaluation of programs discussed in this report.

STANDARDS AND GUIDELINES

Standards/Exposure Limits for employee exposure to various materials evaluated during this survey are discussed under the Results heading, and also found in the Data Tables of this report (See Appendix I, Table I). Information on the sources and types of standards and guidelines are listed in Appendix II. Generally employee exposure results are compared to current Occupational Safety and Health Administration (OSHA) regulations/standards, called Permissible Exposure Limits (PEL), and can be found at 29 CFR 1910.1000, which are often called the Z tables. Where other accepted State-of-the-Art industrial hygiene practices or guidelines, such as the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV) are lower or differ in their approach the most current values for these guidelines have been used and noted. The use of these standards and guidelines are thought to give reasonable protection to the health and well being of employees exposed to these materials. Please see the Appendix section of this report for the results.

The ACGIH TLV's are included in this report as exposure standards because for many substances the ACGIH TLV's are more conservative than OSHA standards. The ACGIH TLV's are more conservative because they are based primarily on the prevention of disease. In contrast, OSHA Permissible Exposure Levels (PEL's) are required to take into account the economic feasibility of reducing exposures in affected industries, public notice and comment, and judicial review. The TLV's are guidelines that refer to the airborne concentration to which it is believed that nearly all workers may be repeatedly exposed, day after day, without adverse effect.

EXECUTIVE SUMMARY

Air sampling for ethylene oxide, xylene, nitric acid and methanol reveled that on the day of the survey, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminates.

Recommendations for the implementation of your respiratory protection and confined space programs and for the installation of an emergency eyewash/shower are being resubmitted. New recommendations for improved housekeeping and the use of eye protection are included with this report.

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METHODS

Air Sampling

Unless otherwise stated, samples were taken in the employees breathing zone to obtain samples indicative of the actual employee exposures. Gilian 513 and 113 air pumps provided the vacuum source. Pumps were calibrated prior to and after the samples collection and were checked for proper operation and flow were necessary and possible. No changes in flow rate were measured, unless noted in the comments section of the results section.

Air samples collected were analyzed by Environmental Health Laboratory in Macon, Georgia and Cromwell, CT which are accredited by the American Industrial Hygiene Association.

RESULTS

Air Contaminants

Table I presents the results of air sampling and analysis. Exposure concentrations are presented in milligrams per cubic meter (mg/M³) or parts per million in air (ppm) by employee and location. Also presented, are the applicable Threshold Limit Value (TLV) or the OSHA Permissible Exposure Levels (PELs).

DISCUSSION

Air Sampling

Chemical Compounds, Inc. is a manufacturer of dye intermediates for hair dyes. Various chemicals are reacted in 6 reactor vessels within the plant. Many different reactions take place, however, of major concern from an industrial hygiene standpoint is the reaction involving ethylene oxide. It is one of the more frequent reactions. Ethylene oxide (ETO) is a highly reactive gas or liquid that can affect the skin, eyes, lungs, and nerves. Ethylene oxide has been found to cause mutations and cancers in animals. Based on these reports and human epidemiological studies showing a higher than expected rate of several cancers, ethylene oxide is considered a suspected human carcinogen.

Nitrogen is introduced into the reactor vessel. The pressure in the vessel is then checked to assure the vessel is holding pressure and there are no leaks. ETO is then piped into the vessel from outside of the building. The ethylene oxide is reacted with 4-fluoro-3-nitroanaline (NFA) under pressure with potassium fluoride added as a catalyst to yield the dye intermediates, NHNFA.

Personal and area sampling for ethylene oxide indicated that employees are exposed to levels below both the OSHA Action Level of 0.5 ppm and the OSHA Permissible Exposure Level of 1 ppm as an 8 hour TWA.

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) nical Compounds, Inc. No. ark, NJ November 9, 1995 Page 6

TABLE I

Sample	Location	Sample Period	Air Contaminant	Concentration	Units	Standard/ Guideline
QK#1	Carlos Molina/ Operator	10:24-2:51	ethylene oxide	< 0.21	ppm	1
QK#2	Area Sample/ at reactor	10:26-3:02	ethylene oxide	< 0.2	ppm	1
X#1	Petro Naranjo/ asst. operator	1:59-3:02	xylene	< 0.34	ppm	100
X#2	Petro Naranjo/ asst. operator	1:59-3:02	xylene	< 0.34	ppm	100
NA#1	Carlos Molina/ Operator	11:36-2:52	nitric acid	< 0.053	ppm	2
NA#2	Carlos Molina/ Operator	11:36-2:52	nitric acid	< 0.05	ppm	2
M#1	Petro Naranjo/ asst. operator	11:45-12:14	methanol	< 48	ppm	200

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APPENDIX II

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FLEASE READ CARRIVELY

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Standards and Guidelines

A listing of the appropriate health standards can be found in the following table. Included in this table are the following:

- Permissible Exposure Limits (Title 29 Code of Federal Regulations (CFR) Part 1910.1000). The PEL's represent the legal exposure limits set by the Federal (or State) Department of Labor/OSHA.
- The 1995 1996 Threshold Limit Values which are guidelines developed by American Conference of Governmental Industrial Hygienists (ACGIH) to protect the health and well being of workers.

For a complete listing and explanation of the use of the PEL's and TLV's, please consult the above documents/sources.

		OSHA	OSHA Permissible Exposure Level (PEL) ¹			ACGIH Threshold Limit Value (TLV) ²			
Substance	Units	8-Hr.³	STEL4	Ceiling ⁵	8-Hr.'	STEL4	Ceiling ⁵		
ethylene oxide	ppm	1		-	1,A2	-	·		
methanol (skin)	ppm	200	-	•	200	250	-		
nitrie seid	ppm	2	-	44-	2	4			
xylene	ppm	100	-	•	100	150	ional Safety and		

ı	xylene		bbta	100	l		100	150	
	PEL	77 . 6	أمسمأ سالسال والع	~~					ional Safety and
	2. TLV	Thre	hold Limit Va	lue published					Iygienists (1994-
	3. 8-Hour/10-Hou 4. STEL 5. Ceiling (C) 6. ETO	Shor Ceili PEL	ime-weighted term exposur	e limit (15 m incentration to omprehensive	inutes). hat should no	r work shift in a t be exceeded du lard for Ethylene	ring any part	of the workin	ig exposure. η.

*****	Al	Confirmed Human Carcinogen;
*****	A2	Suspected Human Carcinogen;
*****	A3	Animal Carcinogen,
*****	A4	Not Classifiable as a Human Carcinogen;
*****	A5	Not Suspected as a Human Carcinogen.
*****	NIC	notice of intended change.

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PLEASE READ CAREFULLY

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APPENDIX III

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METHODS TABLE

Analyte	Flow Rate (liters per minute)	Collection Media	Analysis	Analytical Method
ethylene oxide	0.1	Qazi Ketcham tube	Solvents by Gas Chromatography	FID;NIOSH 1501, S286 modified
methanol	0.178	silica gel tube	Solvents by Gas Chromatography	FID;NIOSH 2000
nitric acid	0.2	Orbo 53 tube	Anions by Ion Chromatography	Conductivity; NIOSH 7903
xylene	0.2	charcoal tube	Solvents by Gas Chromatography	FID;NIOSH 1501, S286 modified

FID = Flame Ionization Detector.



FILL

NOV 23 1981.

DONALD LAN SECRETARY OF STATE

845340175

CERTIFICATE OF INCORPORATION

of

CHEMICAL COMPOUNDS, INC.

THIS IS TO CERTIFY, that I, GEORGE L. GARRISON do hereby associate myself into a corporation under and by wirtue of the provisions of an Act of the Legislature of the State of New Jersey entitled "An Act Concerning Corporations" (Revised Statutes of New Jersey, 1937, Title 14 and Title 14A) and the several supplements thereto and acts mandatory thereof and do hereby agree to take the number of shares of capital stock set opposite my name.

SECOND: The location of the principal office in this State is at 1135 Clifton Avenue, Clifton, New Jersey 07013

THIRD: The name of the agent therein and in charge thereof upon whom process against this corporation may be served is GEORGE L. GARRISON.

FOURTH: The purposes for which this corporation is formed are as follows: To engage in any activity within the purposes for which corporations may be organized under New Jers Statutes Annotated, Title 14A, entitled "Corporations, General"

FIFTH: The name and post office addresses of

the incorporators and the number of shar es subscribed for by them, the aggregate of such subscription being the total amou of capital stock with which this corporation will commence business, is as follows:

GEORGE L. GARRISON 1135 Clifton Avenue Clifton, New Jersey 07013..... 100 shares

SIXTH: The period of existence of this corporat is unlimited.

SEVENTH: The total authorized capital stock of the corporation is two thousand five hundred (2500) shares of common stock without nominal or par value. All or any part of said shares of common stock, without nominal or par value, may be issued by the corporation from time to time and for such consideration as may be determined and fixed by the unanimous vote of the Board of Directors as provided by law.

George Moncayo

7 Berard Boulevard Oakdale, Long Island, N.Y. 11769

Anna Maria Moncayo

7 Berard Boulevard Oakdale, Long Island, N.Y. 11769

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 16th day of November, 1981.

Alnegel Gaucen EORGE L. GERRISON

WITNESS:

TIERRA-B-004598

STATE OF NEW JERSEY)
COUNTY OF PASSAIC)

BE IT REMEMBERED, that on this / L. L. day of November, 1981, before me, a Notary Public of the State of New Jersey, personally appeared GEORGE L. GARRISON who, I am satisfied, is the person named in and who executed the foregoin Certificate, and I, having first made known to him the contents thereof, he did acknowledge that he signed, sealed and delivers the same as his voluntary act and deed.

A NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 9, 1985



CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park

29-75 Riverside Avenue
Newark, New Jersey 07104

(201) 485-3211-2 • Fax: (201) 485-4870

Emergency and Remedial Response Division U.S. Environmental Protection Agency 290 Broadway, 17th Floor Office of Regional Counsel New York, New York 10007-1866

January 28, 1997

To Ms. Amelia Wagner,

As per request, please find enclosed a re-submittal to the following responses to the "Request for Information" received on July 10, 1996 at Chemical Compounds Inc.. The reason for the re-submittal was to further verify specific responses which our company regards confidential information. If you should have any further questions or require additional information, please feel free to contact Jim Giannotti at (201) 485 - 3212.

Sincerely,

Jim Giannottti

jg./JG

c.c: AC/SG

ATTACHMENT A

REQUEST FOR INFORMATION

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Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located at 29-75 Riverside Avenue in Newark, New Jersey may have been discharged into the Passaic River.

Please provide the information requested below, including copies of all available documentation that supports your answers.

- 1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?
- 2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq.? If "yes", please provide the years that your company held such a permit and its EPA Identification Number.
- b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. § 1251, et seq.? If "yes", please provide the years that your company held such a permit.
- 3) Did your company receive, utilize, manufacture, discharge, release, store or dispose of any materials containing the following substances:

	100	
2,3,7,8 tetrachlorodibenzo-p-dioxin		
or other dioxin compounds		
Acetic acid		
Adipic acid		
Ammonia		
Aniline		
Benzene		
Benzo(a) anthracene		
Benzoic acid		
Benzyl chloride		
Butyl benzyl phthalate		
Chlorobenzene		
Chloroethylene		
Chloroform		
1,2-dichloroethene		
Di-n-butyl phthalate		
Ethyl benzene		

	Y	'es	No
Fluoranthene			
Methanol	_		
Methylene Chloride	_		
2-methylnapthalene			
Naptha distillate	<u>-</u>		
Napthalene			
2-nitrophenol			
Petroleum ether	_		
Phenanthrene		_	
Pyrene	_		
Tetrachlorobenzene			
Tetrachloroethane	·		
Tetrachloroethylene	_		
Trichloroethane	_		
Trichloroethylene	_		
Toluene -	-		
Xylene	_		
Arsenic	_ 		·
Cadmium	`_		
Chromium	_		
Copper	_		
Lead	· <u> </u>	 -	
Mercury	_		
Nickel	· -		
Silver	***		
Zinc	_		
Cyanide			
PCBs			

- 4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or by-product.
- b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?
 - i) Describe the chemical composition of these hazardous substances.
 - ii) For each process, what amount of hazardous substances was generated per volume of finished product?
 - iii) Were these hazardous substances combined with wastes from other processes? If so, wastes from what processes?

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5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4). Include information on the following:

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- a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.
- b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.
- c) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.
- i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.
- ii) When drums were stored outside, were empty drums segregated from full drums?
- d) What processes do you use to treat your waste? What do you do with the waste after it is treated?
- 6) a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):
 - i) Was the waste stream discharged into a sanitary sewer and if so, during what years?
 - ii) Were they treated before being discharged to the sanitary sewer and if so, how? Please be specific.
 - iii) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?
 - iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.
- b) For floor drains or other disposal drains at the facility:

- i) Did the drains connect to a sanitary sewer and if so, during what years?
- ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?
- c) i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?
 - ii) If catch basins or lagoons existed, were they lined or un-lined?
 - iii) What was stored in the lagoons?

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- -iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released, and during which years?
- d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.
- e) Also, EPA has information relating to several instances of discharge of process waste water into the sewer system in 1992 and 1995. Please provide a detailed description of these incidents.
- 7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.
- b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.
- 8) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4), were released on the property, into the waste water or storm drainage system at the facility or

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to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

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- a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.
- b) Also, EPA has information that due to an industrial sewer line break in 1992, an unreported quantity of aniline was discharged to the Passaic River. Please provide all information relating to this and any other discharges and any measures taken to mitigate the impact of the discharges.
- 9) a) Was your facility ever subject to flooding. If so, was the flooding due to:
 - i) overflow from sanitary or storm sewer back-up, and/or
 - ii) flood overflow from the Passaic River?
- b) Please provide the date and duration of each flood event.
- 10) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.
- a) EPA has information that your facility has received several notices of violation for discharges of waste water into the sewer system, including a NJDEPE Field Notice of Violation issued on January 7, 1992 and a PVSC Notice of Violation issued on February 9, 1995. Please provide information on how these violations were resolved.
- 11) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?

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- b) If so, please provide all other documents pertaining to the results of these analyses.
- 13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.
- b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.
- c) To the extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.
- 14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.
 - a) State the legal name of your company.
 - b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.
 - c) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.
 - d) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.
 - e) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.
 - f) Identify any predecessor organization and the dates that such company became part of your company.

g) Identify any other companies which were acquired by your company or merged with your company.

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- h) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified in the responses to items (14)(e), (f), and (g), above.
- Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.
- 15) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey :

County of Essex :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

NAME (print or type)

President
TITLE (print or type)

SIGNATURE

Sworn to before me this day of 29 Jan., 1997

Notary Public

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INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # (4a) CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

CHEMICAL COMPOUNDS, INC. RESPONSE TO REQUEST FOR INFORMATION DATED JULY 9, 1996

The following are the responses of Chemical Compounds, Inc. to the Request for Information from the United States Environmental Protection Agency, dated July 9, 1996.

- 1. Chemical Compounds, Inc. (CCI) has operated at the facility in Building #17 at 29-75 Riverside Avenue since 1990. It acquired the facility in July, 1986 (See Deed Attachment 1) and installed equipment through 1990. During the 1986-1990 period it contracted with another entity for the manufacture of its products (See, Termination Notice to Southwest Photo Chem., Inc. Attachment 1).
- 2. (a) Yes, CCI has had a permit pursuant to the Resource Conservation and Recovery Act since 1990. Chemical Compounds Inc.'s EPA Identification # is NJD 108661737. (See Acknowledgement of Notification of Hazardous Waste Activity Attachment 2.)
- (b) Yes, CCI has a permit pursuant to the Federal Water Pollution Control Act, its amendments, the Clean Water Act and the Rules and Regulations of the Passaic Valley Sewerage Commissioners. The Permit Number is 20407122 and CCI has had the permit since July 20, 1992. (See copy of the Sewer Connection Permit with Passaic Valley Sewerage Commissioners-Attachment 3.)

3. Yes, the following is CCI's response to question No. 3.

Hazardous Material	Yes	No
2,3,7,8 Tetrachlorodibenzo-p-dioxin or		Х
other Dioxin Compounds Acetic Acid	$\frac{1}{x}$	
	<u> </u>	
Adipic Acid	X	
Aniline	X	
Benzene	X	
Benzo(a)anthracene		X
Benzoic Acid	X	
Benzy Chloride		X
Butyl Benzyl Phthalate		X
Chlorobenzene	X	
Chloroethylene		х
Chloroform	X	
1,2-Dichloroethene		X
Di-n-butyl phthalate		X
Ethyl Benzene	X	
Fluoranthene		X
Methanol	X	
Methylene Chloride	X	
2-Methylnapthalene		X
Naptha distillate		X
Naphthalene	x	
2-Nitrophenol	X	
Petroleum Ether		X
Phenanthrene		х
Pyrene		Х
Tetrachlorobenzene		х
Tetrachloroethane		х
Tetrachloroethylene	x	
Trichloroethane		Х
Trichloroethylene		Х
Toluene	x	
Xylene	X	

Arsenic		Х
Cadmium		X
Chromium		X
		X
Copper Lead	X	
Mercury		X
Nickel	· .	Х
Silver		X
Zinc	Х	
Cyanide PCBs	X	
PCBs		X

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 42 CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

- 4(b) Attachment 4 contains a list of process waste water streams and their respective hazardous waste components.
 - i) The hazardous components generated as by-products in the waste water stream due to the impurity of the raw materials are detected in ppb concentrations, and are noted in Attachment 4.
 - ii) The amount of hazardous substances generated per volume of each finished product is not available. The hazardous substances generated in the waste water stream of various products are contained in the range of 500 1500 gallons of 99.99 % water. Therefore, an estimated amount of hazardous substances generated per volume of water is < 0.01 %. (See Attachment 4.)

iii) The hazardous substances located in the waste water stream are generated on batch scale operations. The by-products are present in the waste water stream after the separation of the product by filtration. After filtration, the waste water stream is treated for regulated effluent exceedances. After treatment, the waste water is stored in a 10,000 gallon tank. A number of process waste water streams will combine in the 10,000 gallon storage tank.

5 (a) The following table is a list of employees at CCI who were or are responsible for the management of hazardous substances:

Name	Title	Description of Responsibility
Alberto Celleri	Co-President	Overall Operations
Harold Sullivan	Co-President	Overall Operations
Arturo Celleri	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage
Jim Giannotti	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage

5 (b) The following table is a list of transporters who were responsible for off-site disposal; including non-hazardous waste water:

Transporter's Name	Address	TSD Name & Address
Franks Vacuum Truck Services, Inc. NYD982792814	4500 Royal Ave. Niagra Falls, NY 14303	Research Oil Co. 2655 Transport Rd. Cleveland, OH 4415 OHD004178612
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	Systech Environmental 11397 County Road 176 Paulding, OH 45879 OHD005048947
Laidlaw Environmental Services MDD980554653	3527 Whisky Bottom Road Laurel, MD 20424	Laidlaw Environmental Services 3527 Whisky Bottom Road Laurel, MD 20424
Maumee Express NJD986607380	P.O. Box 278 Somerville, NJ 08876	Rineco Chemical Ind. 1007 Vulcan Rd Haskell Benton, AR 72015 ARD981057870
Oldover Corporation VAD098443443	P.O. Box 68 Rt. 1, State Rd. 652 Arvonia, VA 23004	Oldover Corporation P.O. Box 68 Rt. 1, State Rd. 652 Arvonia, VA 23004
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	ECOFLO 2750 Patterson Street Greensboro, Maryland 27407 NCD980842132
Chemical Waste Management of NJ NJD089216790	100 Lister Avenue Newark, NJ 07105	Chemical Waste Management of NJ 100 Lister Avenue Newark, NJ 07105
Tri-State Motor Transit Co. MOD095038998	P.O. 113 Joptin, MO 64802	Rineco Chemical Ind. 1007 Vulcan Rd - Haskell Benton, AR 72015 ARD981057870

5 (c) i)& ii) The following table is a list of storage practices for the hazardous substances included in items (3) & (4) since the beginning of operations:

i .	Name of Hazardous Substance	Storage of the Hazardous Substance
	Acetic Acid	55 gallon Plastic Drum < 4 L Glass Bottle - Laboratory Scale 5,000 gallon Tanker Truck - Waste
	Adipic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
	Ammonia	150 lb. Cylinder
Raw Materials	Benzoic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
or	Chloroform	< 4 L. Glass Bottle - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 galion s/s drum - Waste 5.000 galion Tanker Truck - Waste 4.000 galion S/S Storage Tank - Waste
Laboratory Supplies	Methanol	55 gallon Stainless Steel Drum 250 gallon Plastic Totes 4,000 gallon S/S Storage Tank - Waste 5,000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Methylene Chloride	55 gallon Stainless Steel Drum 4.000 gallon S/S Storage Tank - Waste 5,000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Toluenc	55 gallon Stainless Steel Drum 4.000 gallon S/S Storage Tank - Waste 5.000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Xylene	55 gallon S/S Drum 250 gallon Plastic Totes 4.000 gallon S/S Storage Tank - Waste 5.000 gallon Tanker Truck - Waste < 4 L. Glass Bottles - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
Waste Water	By-Products found in the waste water stream: Aniline, Benzene.	55 gallon drum - Waste
Storage	Benzoie Acid, Chlorobenzene, Chloroform, Ethyl Benzene,	400 - 4,000 gation S/S Storage Tank
(ppb Concentrations) Based on Analytical	Methanol, Methylene Chloride Naphthalene, 2-NitroPhenol, Tetrachloroethylene, Toluene,	10,000 gallon S/S Storage Tank
Data	Xylone, Lead, Zinc, Cyanide	5,000 gallon Tanker Trucks - Waste

The 55 gallon drums or 250 gallon Plastic totes containing hazardous substances listed in items (3) & (4) are stored on wooden palates outside on either a paved area with asphalt or a concrete pad. (See Attachment 5 for a facility layout for the storage areas of hazardous substances.)

In December 1993, a concrete diked area was constructed outside the building located on the southeast part of the building with a capacity of 25,000 gallons. The diked area is within an 18 inch thick concrete berm approximately 4 feet high. Inside is the waste water storage area with (2) 4,000 gallon Above Ground S/S Storage tanks and (1) 10,000 gallon Above Ground S/S Storage Tank on top of an 8 inch concrete slab. In the past, the waste water and or flammable solvents such as methanol, xylene, & toluene were stored in a 5,000 gallon Tanker Truck in that same area. In addition, waste flammable liquids were stored in a 4,000 gallon Above Ground S/S Storage Tank in the diked area. Since September 1995, waste flammable liquids have been recycled. Currently, the 4,000 gallon S/S Storage Tank is being utilized for waste water storage.

Empty drums are segregated from full drums. The empty drums are located at the most southeastern part of the property, adjacent to or in an enclosed shed.

5 (d) The waste water streams are treated by neutralization, chemical precipitation, or carbon filtration. The process waste water streams are transferred to one of (2) 1,500 gallon mixing tanks for the introduction of treatment. One treatment involves neutralization by the addition of Sodium Hydroxide or Sulfuric Acid to meet discharge regulations. Another treatment involves carbon filtration for the removal of organics. The drain water is collected in an Above Ground S/S Storage Tank located in the basement and treated for heavy metals. The treatment for the drain water involves chemical precipitation with the addition of lime followed by filtration. After treatment, the waste water is transferred to a storage tank and analyzed.

If the treatments are effective, the waste water is transferred to a 10,000 gallon Above Ground S/S Storage tank. After the tank is full the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the PVSC sanitary sewer which flows approximately 70 yards to an interceptor of the industrial park. The solid waste generated from treatment is non-hazardous and disposed off-site to a regulated facility. Carbon filtration and chemical precipitation treatment methods have only been used since October, 1995. Prior to that time, the waste water was treated by neutralization.

- 6 (a) i) From July 1992 to the present, the process waste water stream was discharged into a sanitary sewer connected with Passaic Valley Sewerage Commissioners. Before July, 1992, the process waste water stream was connected to a 5,000 gallon tanker truck for off-site disposal.
 - ii) Yes, the waste water stream is treated before discharging into the sanitary sewer. The water is treated by neutralization, chemical precipitation, and carbon filtration. (See 5 (d) for details of the treatment methods.)
 - iii) Before CCI obtained a permit for discharge to the sewer, the waste water stream was collected in a 5,000 gallon tanker truck. When the tanker truck achieved maximum capacity, the water would be sent to a TSD facility for treatment. CCI obtained a permit for discharging process waste water to the sewer on July 20, 1992. (See Attachment 11, for manifests.)
 - iv) Attachment 4 contains analytical results of process waste water streams.
- 6 (b) i) & ii) From 1986 February, 1992, the main manufacturing floor at the facility was equipped with internal floor drains which were directly connected to the sanitary sewer. From February, 1992 through July, 1992, the drain water was collected into an above ground storage tank located on the basement floor and sent directly to a 5,000 gallon tanker truck. When the tanker truck became full, it was sent for off-site disposal. From July, 1992 April, 1993, the drain water was sent to the 5,000 gallon Tanker Truck, then was combined with process waste water and then transferred to an above ground storage tank in the basement. After sampling and analysis for effluent exceedances, the waste water was combined in the basement with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer. In April, 1993 CCI replaced the 5,000 gallon Tanker Truck with a 10,000 gallon above ground S/S Storage tank.

From 1995 to the present, the drain water has been transferred to an above ground S/S storage tank for the treatment of heavy metals by chemical precipitation. After treatment, the drain water is transferred to another above ground storage tank for analysis. If the treatment has been successful, the drain water is sent directly to the 10,000 gallon Storage Tank, and mixed with the process waste water. After the tank has accumulated to its maximum capacity, the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer which flows approximately 70 feet to an interceptor of the industrial park.

- 6 (c) i) There have been no storm sewers, catch basins, or lagoons located at Building # 17, 29-75 Riverside Ave., Newark, N.J. since the beginning of operations of CCI.
 - ii) N/A
 - iii) N/A
 - iv) N/A
- 6 (d) The facility layout for the collection, storage, and disposal of waste water can be located in Attachment 6.
- 6 (e) On January 7, 1992 the Newark Fire Department and the New Jersey DEP responded to a complaint of a discharge at the CCI facility. CCI's next door neighbor had plugged up the sewer line, and when CCI'S personnel excavated the line to attempt to clear it, the contents of the line, including water colored purple with Red # 3 and Blue # 2 dye was disbursed into the excavation. This water was pumped out of the excavation onto the ground where it was observed by the Fire Department and DEP. CCI was ordered to clean up the discharge, which was analyzed and shown to be non-hazardous. (See analysis of soil and liquid samples Attachment 8). CCI was charged with discharging to the PVSC sewer without a permit (See Attachment 7).

Subsequently, after CCI obtained a PVSC permit, it was cited by PVSC for having discharged waste water to the sewer which contained some volatile compounds and metals in excess of permitted concentrations. These discharges exceedances have been resolved, and current treatment methods appear to be keeping wastewater discharges within permitted parameters.

- 7 (a) The total amount of hazardous substances generated during the operation of the facility on an annual basis can not be determined. The hazardous substances which are contained in the waste water stream are determined by the purity of the raw materials. As a result, contaminant concentrations differ from one manufacturing batch to another.
- 7 (b) Chemical Compounds Inc. has not discharged any hazardous materials into the Passaic River.
- 8 (a) There have been no leaks, spills, explosive fires or other incidents that occurred at the CCI facility that resulted in hazardous substances being released.

- 8 (b) CCI did not discharge any hazardous material into the Passaic River. (See answer to 6(e) for description of incident.)
- 9 (a) Yes, CCI's facility is subject to flooding due to the close proximity of the Passaic River. Flooding does occur due to the overflowing of the Passaic River. As a result, the water generated due to the flooding of the Passaic River is analyzed, treated and stored at our facility before discharging to the sewer.
- 9 (b) Flooding occurs during very bad storms, the dates of each occurrence are not known.
- 10 (a) In 1992, due to the discharge described in 6(e), CCI paid administrative costs to the New Jersey Department of Environmental Protection for the discharge response. The NJDEPE Case # is 92-01-07-1025. In addition, CCI was charged with violating the Water Pollution Control Act for negligently discharging a pollutant into a municipal treatment works without possessing a valid industrial pretreatment permit issued by the Passaic Valley Sewerage Commission. CCI pled guilty to a fourth degree water pollution violation with a fine of \$5,000 for the offense and had to provide a check in the amount of \$1,760.85 payable to the Office of the State Environmental Prosecutor to be used to purchase a one page advertisement in the Gloucester Times conveying a positive environmental message.

CCI also paid for administrative costs when the Bureau of Emergency Response responded to a chemical fire at the facility on October 5, 1993. The case was closed. The NJDEPE Case #'s are 93-10-05-0736 & 93-10-05-1110.

On September 14, 1994, CCI had received a Notice of Violation from the Division of Facility Wide Enforcement - NJDEP. The inspection identified a violation of the Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder. Remedial actions to correct the violations were implemented by CCI within days and no further enforcement was required thereafter.

With regard to violations of discharge permit limitations, CCI resolved the matter by entering into a Consent Order and Final Judgement with the Passaic Valley Sewage Commissioner on November 24, 1994, by which it paid \$6,000 to PVSC and entered into a compliance schedule, which was subsequently extended to July 1, 1996. (See Consent Order and Final Judgement and other relevant documents - Attachment 9 & 10.)

11) For the purchasing of listed hazardous substances, such as raw materials, in item (3) or (4), the following table indicates CCI's suppliers since the beginning of operations. Documents such as invoices, bill of ladings, and a purchase order book for receiving these hazardous substances are available.

Hazardous Substance - Ruw Material	Supplier's Name	Supplier's Address
	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Acetic Acid	Duso Chemical	173 Smith Street Poughkeepsie, N.Y. 12602
Adipic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
Auple Sea	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Ammonia	Jones Chemical	80 Munson Street LeRoy, N.Y. 14482
Benzoic Acid	Textile Chemical	990 Jersey Ave. New Brunswick, N.J. 08901
23.000	ILM Industries	8675 Hidden River Parkway Tampa, FL 33637
Methanol	Brown Chemical	302 West Oakland Ave, Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Methylene Chloride	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Toluene	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
tomene	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Xylenc	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901

For laboratory supplies, the following table provides information regarding suppliers:

Laboratory Material Name	Supplier's Name	Supplier's Address
	PCI Scientific Supply, Inc.	41 Plymouth Street
Acetic Acid Adipic Acid		Fairfield, N.J. 07004
Benzoic Acid Chloroform	J.T. Baker	89 Newbury Street Suite 103
Methylene Chloride Methanol		Danvers, MA 01923
Toluene Xylene	Fisher Scientific	711 Forbes Avenue Piusburgh, PA 15219-4785

For the hauling and disposal of listed substances, such as waste water, plant and laboratory solvents, in items (3) or (4), the following table indicates CCI's past and present transporters and disposal facilities. Documents, such as manifests, for the disposal of these hazardous substances are in Attachment 11.

Hazardous Substance	Transporter Name	TSD Name
Methanol, Xylene Waste Flainmable Liquids	Freehold Cartage Inc.	ECOFLO 2700 Patterson St. Greensboro, NC 27407
Dye Waste Water Non-Hazardous	Chemical Waste Management	Chemical Waste Management 100 Lister Ave. Newark, NJ 07105
Methanol, Xylene Waste Flammable Liquids	Oldover Corporation	Oldover Corporation Route 1, State Road 651 Arvonia, VA 23004
Chloroform, Methylene Chloride, Xylene Laboratory Solvents Waste Flammable Liquids	Tri-State Motor Transit Co.	Rineco 1007 Vulcan Rd Haskell Benton, AR 72015
Dye Waste Water Non-Hazardous	Laidlaw Environmental Services	Laidlaw Environmental Services 3527 Whiskey Bottom Rd. Laurel, MD 20724
Dye Waste Water Non-Hazardous	Maumee Express	Rineco 1007 Vulcan Rd Haskell Benton, AR 72015
Waste Dye (HC Yellow # 2)	Franks Vacuum Truck Service Inc.	Research Oil Company 2655 Transport Rd. Cleveland, OH 4415
Methanol, Xylene Waste Flanunable Liquids	Freehold Cartage Inc.	Systech Environmental 11397 County Rd. 176 Paulding. OH 45879

12 a) & b) There has been no sampling of the soil, ground water, or surface water at the facility for purposes other than those identified in the responses above. However, an Occupational Health Survey was conducted by CCI's insurance company to evaluate employee exposure to possible various airborne contaminates. The survey included air sampling for xylene, methanol and others. As a result, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminates. Attachment 12 contains the report provided by CCI's insurance company.

13 a) Yes, CCI has owned the facility at 29-75 Riverside Ave. - Building # 17 since July 1, 1986. Attachment 1 contains a copy of the deed of sale. The property was purchased from Industrial Development Associates, Inc..

13 b) N/A

13 c) In 1888 the Freeholders of Essex County sold the property to Triton Boat Club of Newark. This transaction is recorded in Essex County Deed Book K-24, Page 133. On May 16, 1902, Patton Paint Company acquired the property from the Triton Boat Club of Newark, as recorded in Deed Book I-35, Page 270. Patton Paint Company was a manufacturer of paint and varnishes.

Thereafter, Pittsburgh Plate Glass Co. which manufactured paint and varnishes, took the subject property. The property was identified as Block 614, Lot 1. The current facility - Building # 17 - was constructed by the Pittsburgh Plate Glass Co. as a chemical resin manufacturing facility for its operation. PPG, Inc. which was formerly called Pittsburgh Plate Glass Co. purchased the property on January 31, 1941, and held the property to August 2, 1971.

In 1971, the site was sold to a developer, Riverside Ave. Properties, Inc.. Deed Book 4382, Page 1023. Riverside Ave. Properties. Inc. thereafter leased the site. On October 11, 1979, the property was sold to another developer. Industrial Development Corporation, which sold the property a month later to Industrial Development Associates. The principal of Industrial Development Associates is Anthony V. Pugliese. III. Industrial Development Associates leased the building to S.B.S. Chemicals, Inc. and Desachem Co., Inc., manufacturers of chemicals and detergents. S.B.S. Chemicals and Desachem Co., Inc occupied Building # 17 pursuant to a lease agreement with Industrial Development Associates, which argument expired on August 14, 1985. Thereafter, the building was vacant and the lot and block numbers were changed and subdivided from Block 614, Lot 1 (partial) to Block 614, Lot 66. CCI has no relationship with the past owners or tenants.

- 14 (a) The legal name of the company is Chemical Compounds Inc...
- 14 (b) The president of the company is Mr. Alberto Celleri. Mr. Celleri's address is 10 Baldwin Court, Roseland. NJ 07068.
- 14 (c) Chemical Compounds Inc. is incorporated in the state of New Jersey.
- 14 (d) Attachment 13 contains a copy of the company's "Certificate of Incorporation" and amendments thereto.
- 14 (e) CCI is not a subsidiary or affiliate of another company.
- 14 (f) Chemical Compounds Inc. has no predecessor organization.
- 14 (g) Chemical Compounds Inc. has not acquired nor merged with any other company.
- 14 (h) N/A
- 14 (i) There are no previous owners of CCI.
- 15. The person answering this Request for Information is Alberto Celleri, President of CCI, 10 Baldwin Court, Roseland, New Jersey 07068 (201) 364-0370. Mr. Celleri has personal knowledge of the responses. Mr. Jim Giannotti, 72 Califon Drive, Colonia, NJ 07067, (908) 382-5591, a Chemical Engineer at CCI, assisted with the preparation of these responses.

D

DEED Record and return to: Industrial Development Associates 7 George Garrison, Esquire 1715 Clitton Avenue Clifton, New Jersey 07015 Grantee. Grantee.

This Deed is made on

July 1

BETWEEN

INDUSTRIAL DEVELOPMENT ASSOCIATES, 141 Lanza Avenue

Garfield, New Jersey

aving its principal office at

a corporation of the state of 141 Lanza Avenue, Garrield, New Jersey

referred to as the Grantor,

AND

Chemical Compounds, inc.

hose post office address is

子が子が

10 Valley Road, Stanhope, New Jersey

referred to as the Grantee.

word "Gramee" shall mean all Grantees listed above

The Grantor acknowledges recept of this money.

Tax Map Reference. (N.J.S.A. 46:15-2.1) Municipality of "Block No. 614 Lot No. 66

Newark.

Account No.

No property tax identification number is available on the date of this Deed, (Check loved applicable.)

Property. The property consists of the land and all the buildings and structures on the land in the City Hewark. County of Essex and State of New Jersey. The legal description is:

Being known and described as proposed Las. "C" as faid out and described on a certain subdivision map entitle "Proposed Subdivision Lot 1 - Block 614 Newark Tax Hap" prepared by Borrie, MacDonald & Watson, dated June 25, 1984, and filed in the Essex County Register's Office on February 4, 1985 as Map No. 3594. This conveyance is made subject to and along with the right of ingress and egress along, over and through the easement area fain out and provided for in the aforementioned subdivision map.

See Schedule A attached hereto for additional description.

60% 49316 (Sec. 214)

SCHEDULE A

All those certain tract or parcel of land, and any improvements now or hereinafter constructed thereon lying and being in the County of Essex, in the City of Newark and the State of New Jersey, being further described as follows:

Being known and designated as Lot C in Block 614 as shown on Map entitled "Map of Subdivision of Lot 1 - Block 614" filed February 4, 1985 in the Essex County Register's Office as Map Number 3594.

Being further described as follows:

BEGINNING at a point where the Northeasterly boundary line of Lot B in Block 614, as shown on the above mentioned map, intersects the United States Pierhead and Bulkhead Line along the Passaic River, and running; thence:

- Along said Pierhead and Bulkhead Line, North 38 degrees 47 minutes 20 seconds East 82.94 feet to a point; thence:
- (2) Continuing along said Pierhead and Bulkhead Line, North 31 degrees 09 minutes 20 seconds East 25.41 (cut to a point; thence:
- (3) North 51 degrees 15 minutes 40 seconds West 100.00 feet to a point; thence:
- (4) North 89 degrees 43 minutes 30 seconds West 52.33 feet to a point; thance:
- (5) South 36 degrees 52 minutes 20 seconds West 79.00 feet to a point in the Northeasterly boundary line of Lot B; theace:
- (6) Along said Northeasterly boundary line of Lot B. South 52 degrees 37 minutes 40 seconds East 141.72 feet to a point in the United States Fierhead and Bulkhead Line and the point and place of BEGINNING.

Being also known as Lut 66 in Block 614 on the Tax Hap of the City of Newar

The conveyance of the foregoing casement for ingress and egress is made expressly subject to the Grantee's obligation to maintain same at its own cost and expense in common with all others using same and it is understood that the Granter shall have no responsibility or obligation in that regard whatsoever.

This conveyance is made subject to the following covenant which shall be construed as a covenant running with the land binding the Grantee, its successors and assigns.

The Grantee, its successors and assigns, shall be obligated to pay the Grantor, its successors and assigns, five (5t) percent of the cost of snow removal, guard service, and exterior janitorial and maintenance service artributable to the premises owned by the Grantor of which the premises conveyed hereunder formed a part. The Grantee covenants to pay any or all of the atoresaid costs within ten (10) days of the receipt of the Grantor's bill for same. In the event that the Grantee fails to pay any or all of the aforesaid costs within thirty (30) days of the receipt of Grantor's bill for same, said costs shall become a lien against these premises which lies shall be subordinate to any mortgage lien against these premises provided that the proceeds of such mortgage have been invested into the premises described above.

The Grantce also covenants with the Grantor to join any property owner's association formed subsequent to this conveyance to administer the terms of the covenant. The Grantor represents that it shall cause any of the romaining property owned by it at 29-75 Riverside Avenue, Newark, New Jersey, of which those promises formed a part, to be charged with a similar covenant and that it shall fairly and evenly administer same as to all of the promises affected.

This conveyance is subject to easements and restrictions of record if any, zoning ordinances, state, county and municipal laws or ordinances affecting the premises and such state of facts as an accurate survey would reveal.

₂₃₋₄₉₃₆ au 215

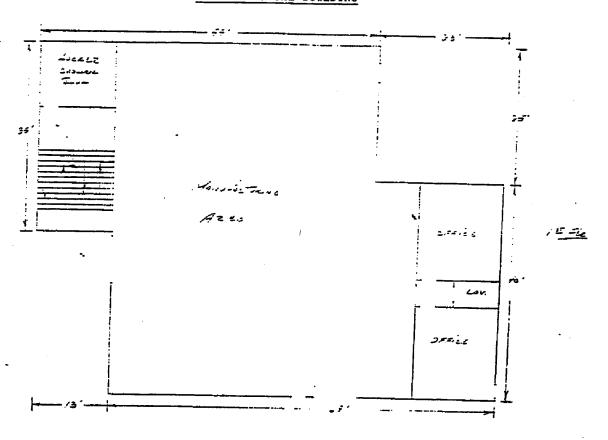
****4936 (** 241)

Printises by Grantie. The Grantor promises that the Grantor has done to act to encumber the property. This promise is called a "carculant as to grantor's acts" (N.J.S.A. 46.4-6). This promise means that the Grantor has not allowed anyone else to obtain any legal upday which affect the property (such as by making a mortgage or allowing a judgment to be entered against the Grantor).

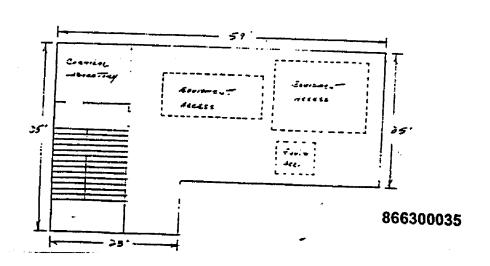
Signatures. This Deed is signed and affested to by the Granton's proper corporate officers as of the date at the top of the first page, its corporate seal is affixed.

gare as the role or the first page, its corporate se	at is attice	Acd
Nitested by	BY:	General Parther
Matricia Pugliese Serietary	",.	Anthony V. Puglices. Problem
STATE OF NEW JERSEY, COUNTY OF	Essox	5 8.
I CERTIFY that on July 1		. 1986
Patricia Puntiese		•
personally came before me and this person acknown	wiedged a	tinder early, to my satisfaction, there
(a) this person is the	secretary	red industrial bevelopment
Associates	•	the annualing months of the
(b) this person is the attesting witness to the Anthony V. Pugliese, 171	spaing .	of this Deed by the proper corporate officer who is
(c) this Deed was signed and delivered to the resolution of its Hound of Directors;		President of the corporation; domay its voluntary act duly authorized by a projec
(d) this person knows the proper seal of the c	130 (33 1113) (4111	on which was affixed to this Deed.
(c) cost between sikned the breed to stife? It if	he truth u	of these facts; and
(1) the full and actual consideration paid or p	o he nand	I for the transfer of this is \$195, 000, 000, 000
fonce composition is defined in 18.1.2.3	40:15-5)	J. T. Canada
Signed and sworn to before me on		
7 July 1 1986		
		and the same of th
Plants Burns and South		Patricia Puglica
Henry Paper, an Attorney at law o the State of New Jersey	ıſ	The second registration of the second registrati
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
0		******

DIAGRAM OF THE BUILDING









CHEMICAL COMPOUNDS, INC.

Biverside Industrial Park

29-75 Riverside Avenne * Newsak Newsterdev 07104

201 (1850 E. 162

END _ Doc 10, 1990

September 10, 1990

Southwest Photo Chem, Inc. 350 Electra Street Pomona, California 91766

Attention: John Jeleniewski

Reference: Contract dated December 20, 1983

Dear John:

Back in 1983, we entered into a Contract dated December 20, 1983 whereby you agreed to perform certain services for us. Paragraph 8 of said Agreement provided that the Contract would extend for a period of five (5) years and annually thereafter unless either party gave the other ninety (90) days notice of termination.

The purpose of this letter is to give you ninety (90) days notice of termination of our Agreement of December 20, 1983 and any subsequent amendments thereto. You are advised that the restrictive coverant contained in the Agreement and the confidential information obtained under said arrangement with us is protected in accordance with our Agreement.

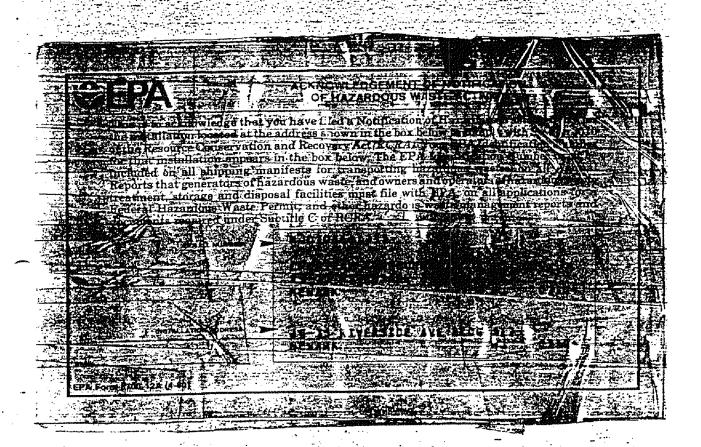
Our relationship has been a good relationship, and we appreciate the assistance you have given us in the past. Our arrangement is terminated in accordance with our Agreement and this letter.

Very truly yours,

CHEMICAL COMPOUNDS, INC.

Harold E. Sullivan

President





PASSAIC VALLEY SEWERAGE COMMISSIONERS

SEWER CONNECTION PERMIT

PERMIT #	20407122
In compliance with the provis	Number on any correspondence with PVSC) sions of the Federal Water Pollution Control Act, Vater Act and the Rules and Regulations of the numissioners:
Che	mical Compounds, Inc.
_	
	after referred to as the Permittee) zed to discharge from a facility located at
29-75 Riversi	de Avenue - Building #17
Newark, New J	ersey 07104

to the Passaic Valley Sewerage Commissioners Treatment Works in accordance with discharge limitations, monitoring requirements and other conditions set forth herein.

EFFECTIVE DATE	07/20/92				
EXPIRATION DATE	07/20/97				

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Rev: 02/96



CHEMICAL COMPOUNDS INC.

WASTE WATER POLLUTANTS

The following is a list of pollutants detected in each specific waste water stream. The pollutants typed in BOLD face are detected regulated compounds in our waste water discharge. The numbers indicated in the table (and in parenthesis) are of an average concentration analyzed inhouse or at an accredited laboratory - <a href="https://doi.org/10.1007/jhr.1007/jh

WASTE WATER STREAM	PRIORITY POLLUTANTS							
(COD Conc.)	Heavy Metals		Cyanide Conc. (ppm)	Organics				
	Pb Conc. (ppm)	Zn Conc. (ppm)	- V	VOA Conc. (ppb)	BNA Conc. (ppb)			
NDAPA COD - 450,000 ppm .	0.8	0.9	15	Methylene Chloride (38) Acetone (13,200) Chloroform (25) 1,2-Dichloroethane (130) Toluene (1650) Chlorobenzene (382) Ethylbenzene (26) Chloromethane (550) Benzene (960) o-Xylene (4150) m.p-Xylene (103)	Phenol (300) 2-Nitrophenol (450) Nitrobenzene (286) Aniline (2680) 2-Nitroaniline (800) 3-Nitroaniline (870)			
HC Blue # 2 COD - 60,000 ppm	< 0.20	1.0	2.0	Tetrachloroethylene (220) Chłoroform (19)	2-Nitrophenol (650) bis (2-Chloroethyl)Ether (440)			
NHNFA COD - 42,000 ppm	< 0.20	0.3	< 0.10	Chloroform (22) Methylene Chloride (25) 1,2-Dichloroethane (1800) Toluene (41) Chlorobenzene (57) o-Xylene (32,000)	Phenol (320) 2-Nitrophenol (770) bis (2-Chloroisopropyl)Ether (7700) Nitrobenzene (73) 2-Nitroaniline (820) 3-Nitroaniline (860)			
NPD COD - 82,000 ppm	< 0.20	0.35	0.20	Below MDL	Phenol (26) 2-Nitrophenol (155) Isophorone (180) 2-Nitroaniline (300) 3-Nitroaniline (980)			

WASTE WATER STREAM (COD Conc.)	PRIORITY POLLUTANTS							
(COD Conc.)	Heavy Metals		Cyanide Conc. (ppm)	Organics				
	Pb Conc. (ppm)	Zn Conc. (ppm)		VOA Conc. (ppb)	BNA Conc. (ppb)			
HC Yellow # 2 COD - 110,000 , ppm	< 0.20	0.32	< 0.02	Chlorobenzene (2810) Xylenes (49,100) 1,2-Dichlorobenzene (169)	2-Chlorophenol (496) Nitrobenzene (259) 2-Nitrophenol (3380) 2-Nitroaniline (5510)			
HC Yellow # 4 COD - 190,000 ppm	< 0.20	0.850	< 0.01	Methylene Chloride (594) 1,2-Dichloroethane (7200) Acetone (8600) Chloroform (53) Xylenes (260)	bis (2-chloroethyl) Ether (47,600) bis (2-Ethylhexyl) phthalate (107)			
DNHA	1.43	0.9	< 0.01	Below MDL	2,4-Dinitrophenol (12,100)			
HC Yellow # 5	1.43	0.8	< 0.01	1,2,4-Trichlorobenzene (44.2) 4-Chloroaniline (442)	Below MDL			
NOPD COD - 225,000 ppm	0.269	0.277	< 0.05	Below MDL	Below MDL			
HC Red #3	< 0.20	0.372	< 0.01	Methylene Chloride (32) Chloroform (41) 2-Butanone (54) Bromodichloromethane (31) Toluene (17) m,p -Xylene (35) 1,2-Dichloroethane (50)	2-Nitroaniline (100)			

**** MDL - Mean Detection Limit

ACCREDITED LABORATORIES, INC. VOLATILE ORGANIC ANALYSIS DATA

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CASE NUMBER	3180 9508936 >A3540 CCI	MATRIX DILLUTION FACTOR DATE EXTRACTED DATE EXTRACTED DATE AVER YER BY
EIFIO IO	NDAPA	ANALYZED BY

Aqueous
10
96/28/95
LARRY

*******	. 电电子电子电子 电电子电子 化甲基苯甲基甲基甲基甲基甲基甲基甲基甲基			HW.	CAC A	COMPOUND	UG/L		HOL
CAS #	COMPOUND	UG/L		HOL	CAS #		*******		
=#2505B	12 出版表示 3 六五次 5 正正 2 元 李 2 元 3 元 3 元 3 元 3 元 3 元 3 元 3 元 3 元 3 元			61	79875	1,2-Dichlaropropana	u		4.0
107028	Acrolein	Ü		66	10061015	cis-1,3-Dichloropropens	U		4.8
107131	Acrylonitrile		51	26	79016	Trichloroethene	U		4.6
74873	Chloromethana	550	¥		71432	Benzene	960	u	4.0
74839	Bromomethane	300	W	20	124481	Dibromoch leremethana	u		4, (
75014	Vinyl Chloride	U		20		1,1,2-Trichloroethane	IJ		4.0
75003	Chloroethane	. U		28	79005	trans-1,3-Dichloropropens	11		4.0
75092	Methylene Chloride	Ų		19	10061026		ü		20
67641	Acetone	2400 8	u	18	110758	2-Chioroethylvinylether	u		4.0
75158	Carbon Disulfide	U		4.0	75252	Bremoform	110		9.0
75694	Trichlorofiuoromethane	U		4.9	591 <i>7</i> 86	2-Hexanone			
75354	1,1-Dichlorosthens	. 4		4, 8	108101	4-Methyl-2-pentanone	68		7.0
	1,1-Dichloroethane	Ü		4.0	127184	Tetrachloroethene	U		4,0
75343	trans-1,2-Dichloroethene	ü		4.0	79349	1,1,2,2-Tetrachloroethane	Ų		6.0
156605		31	u	4.0	108883	Ta luene	1500	¥	5.0
67663	Chloraform	U	-	4.0	108907	Chlorobenzene	68	u	4.0
107062	1,2-Dichloroethane	1800		4.0	100414	Ethylbenzene	26		10
<i>7</i> 8933	2-Butanone	7000		4.0	100425	Styrens	U		4.0
71556	1,1,1-Trichloroethane	_		4.0	1330207	m,p-Xylene	37	빏	28
56235	Carbon Tetrachloride	U			95476	o-Xylane	250	W	21
^9054	Vinyl Acetate	u		8.8		cis-1,2-Dichloroethane	Ü		4.9
74	Bromodichloromethana	U		4.8	156592	C19-1 15-0 loutes on cuane	•		

SURROGATE CUMPOUNDS	RECOVERY	LIMITS	STATUS
1.2-Dichloroethene-d4	191 %	76-114	<u>_0K</u>
Taluene-d8	90 %	89-110	<u>_0k_</u>
Record Lucenherzens	97 %	. 86-115	<u>OK</u>

 $^{{\}bf J}$ - Indicates compound concentration found below MOL.

B - Indicates compound found in associated blank.

U - Indicates compound analyzed for but not detected.

W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Mater Quality Criteria from New Jarsey Register dated February 1, 1993...

ACCREDITED LABORATORIES, INC. BINA ORGANIC ANALYSIS DATA

CASE NUMBER	3180
SAMPLE NUMBER	9508936
DATA FILE	>81194
IENT NAME	CC1
. ופוס נוס	NORPA

Š

Company of the state of the sta

MATRIX	Aquequs
DILUTION FACTOR	50
DATE EXTRACTED	06/28/95
DATE ANALYZED	07/22/95
ANALYZED BY	PAUL

CAS #	COPPOUNO	UG/L	MOL	CAS #	COMPOUNO	UG/L	(III)
488458 4		300 J	500	59507	4-Chloro-3-methylphenol	U	100
108952	Phena I	u	500	88862	2,4,6-Trichlarophenal	u	50
95578	2-Chlorophenol	Ü	500	95954	2,4,5-Trichlorophenal	U	50
95487	2-Methylphenol	ū	500	51285	2,4-Oinitrophenol	ម	250
108394	3&4-Methylphenol	450 J	500	100027	4-Ni tropheno l	· U	250
88755	2-Nitrophenal	Ü	500	534521	4,6-Dinstro-2-methylphenol	Ü	250
105679	2,4-Dimethylphenol	ŭ	500	87865	Pentach loropheno I	U	250
120832	2,4-Oichlorophenol	່ ນ	500	121142	2.4-Dinitrotoluene	U	50
111444	his(-2-Chloroethyl)Ether	ü	500	84662	Diethylphthalate		56
541/31	1,3-Dichlorobenzene	Ü	500	7005723	4-Chlorophenyl-phenylether	IJ	50
106467	1,4-Oichlorobenzene	Ü	1000	86737	Fluorene	u	5t
100516	Benzyl Alcohol	Ü	500	188016	4-Nitroaniline	U	25 6
755 01	1,2-Dichlorobenzene	Ü	500	86306	N-Mitrosodiphenylamine	· U	56
108601	bis(2-Chloroisopropy))ether	Ü	500	101553	4-Bromophenyl-phēnylether	u	51
621647	N-Ni troso-Di-n-propylamine	Ü	500	118741	Hexachlorobenzene	u	50
67721	Hexach loroethane	74 JU	500	95018	Phenanthrene	U	51
98953	Nitrobenzene	U	500	120127	Anthracene	IJ	56
78591	Isopharane	Ü	2500	84742	Di-n-Butylphthalate	Ū	50
65850	Benzoic Acid	U	500	206440	Fluoranthene	Ü	50
111911	bis(-2-Chloroethoxy)Methane	Ü	500	129000	Pyrene	บ	50
~20921	1,2,4-Trichlorobenzene	Ü	500	8 5 687	Butylbenzylphthalate	Ü	50
203	Naphthalene	Ü	1080	91941	3,3'-Dichlorobenzidine	ü	198
16478	4-Chloroeniline	u	500	56553	Benzo(a)Anthracene	ŭ	54
37683	Hexachlorobutadiene	U	500	117917	Bis(2-Ethylhexyl)Phthelete	ū	50
91576	2-Methylnaphthalane	U.	500	218019	Chrysene	Ü	50
?7474	Hexachlorocyclopentadiene	U U	500	11784U	Di-n-octyl phthalate	ŭ	50
91587	2-Ch lorenaphtha lene	800 J	2500	205992	Benzo(b) fluoranthene	ŭ	50
38744	2-Nitroanstine		500 500	207089	Benzo(k)Fluorenthene	ũ	50
131113	Dimethyl Phthalate	U	500	50328	Benzo(a)Pyrene	Ū	50
208968	Acenaphthylana	() 074 1	2500	193395	Indens(1,2,3-cd)Pyrene	ü	50
99092	3-Mitroansline	87 4 J	2700 50 0	53703	Dibenzo(a,h)Anthracene	u	50
83329	Acenaphthene	U		191242	Benza(g,h,i)Perylene	u	50
132649	Orbenzofuran	U	500 500	62759	N-Nitrosodimethylamine	u	50
606202	2,6-Dinitrotoluene	IJ	788	04/77	In att the continue to Atam the	U	70

SURROCATE COMPOUNDS	RELUCERY	<u> </u>	<u> 3181103</u>
Nitrobenzene-d5	42 %	35-114	_OK
2-Fluorob iphenyl	49 %	43-116	<u> 0</u> K
Terphenyl-d14	89 ×	33-141	OK
Pheno I-d5	42 %	10- 94	_UK
2-Fluorophenol	34 X	21-100	ÜK
2,4,6-Tribromophenol	30 %	10-123	_OK_

J - Indicates compound concentration found below MOL.

B - Indicates compound found in associated blank.

U - Indicates compound analyzed for but not detected. W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

*** 3-Methylphanol and 4-Mathylphanol can not be separated by the method applied

AND THE LOCAL PROPERTY OF MERCHANISM STATES OF THE PROPERTY OF

Integrated Analytical Laboratories, Inc.

273 Franklin Road Randolph N.J. 07869

201 361-4252 Fax: 201 989-5298

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

HCBIUE#2

Project Name: PVSC MONITORING Lab Case Number: 10950 - 2904

MDL - METHOD DETECTION	7.1.1.2			< = LESS T	HAN THE M
1	•		OLATILES		
		N	fethod 624		
Lati ID : 2904-001				Date Sampled :	12/26/95
Cliệnt ID : 001			-	Time Sampled:	15:00
Matrix/Units : Aqueous - μg/L			•	Date Analyzed:	1/2/96
Percent Moisture: 100			•	•	
Compound	Conc. Q	MDL	Compound	Conc. Q	MOL
hioromethana	< 10.0	10.0	Bromodichloromethane	< 10.0	10.0
/inyl Chloride	< 10.0	10.0	2-Chloroethyl Vinyl Ether	< 10.0	10.0
Promomethene	< 10.0	10.0	cis-1,3-Dichloropropene	< 10.0	10.0
hioroethane	< 10.0	10.0	Toluene	< 10.0	10.0
richlorofluoromethane	< 10.0	10.0	trans-1,3-Dichloropropene	< 10.0	10.0
,1-Dichloroethene	< 10.0	10.0	1,1,2-Trichloroethane	< 10.0	0.01
Acthylene Chloride	< 20.0	20.0	Tetrachioroethene	< 10.0	10.0
rans-1,2+Dichloroethene	< 10.0	10.0	Dibromochloromethane	< 10.0	10.0
.1-Dichloroethane	< 10.0	10.0	Chlorobenzene	< 10.0	10.0
Zularoform.	18.8	10.0	Ethylbenzene	< 10.0	0.01
,1,1-Trichloroethane	< 10.0	10.0	Total Xylenes	< 10.0	10.0
arbon Terrachionide	< 10.0	10.0	Bromoform	< 10.0	10.0
,2-Dichiloroethans	< 10.0	10.0	1,1,2,2-Tetrachloroethane	< 10.0	10.0
enzene	< 10.0	10.0	1,3-Dichlorobenzene	< 10.0	10.0
richluroethene	; < 10.0	10.0	1,4-Dichlorobenzene	< 10.0	10.0
,2-Dichloropropane	< 10.0	10.0	1,2-Dichlorobenzene	< 10.0	10.0
			L CYANIDE		W. F
		Met	hod 335.2		
ab ID : 2904-001				Date Sampled: 13	2/26/95
Client ID: 001				Time Sampled: 1:	
latrix/Units : Aqueous - mg/L				Date Analyzed: 1	/2/96
ercent Moisture: 100	V)		,	
	Result		MDL		
	1.00 /		0.05	442	

The liability of Integrated Analytical Euboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751

Now York Certified Lab # 11402

Laboratory Director



Lab ID 2903-01

Integrated Analytical Laboratories, Inc.

273 Franklin Road Randolph, N.J. 07869

01-15-1395 04:51PM PRUM IMPERATION HIMLITICHE LHO

201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101

HOBULETE2

Project Name: PVSC - MONITORING Lab Case Number: 10950 - 2903

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

12/26/95

Date Sampled:

SEMIVOLATILES - BASE NEUTRALS

Method 625

Client ID: 001				Time Sampled:	15:00
Matrix/Units : Aqueous - µg/L	•			Date Analyzed :	1/11/96
Percent Moisture: 100			•		
Compound	Conc. (Q MDL	Compound	Conc. Q	MDL
N-Nitrosodimethylamine	< 100	100	Diethylphthalate	< 100	100
Aniline	< 100	100	Fluorene	< 100	100
bis(2-Chloroethyl)ether	< 100	100	4-Chlorophenyl-phenylother	< 100	100
1.3-Dichlorobenzone	< 100	100	4-Nitroaniline	< 100	- 100
-Dichlorobenzene	< 100	100	N-Nitrosodiphenylamine	< 100	100
zenzyl alcohol	< 100	100	1,2-Diphenylhydrazine/Azobenzer	ne < 100	100
1,2-Dichlorobenzene	< 100	100	4-Bromophenyl-phenylether	< 100	100
bis(2-chloroisopropyl)ether	< 100	100	Hexachlorobenzene	< 100	100
N-Nitroso-di-n-propylamine	< 100	100	Phenanthrene	< 100	100
Hexachloroethane	< 100	100	Anthracene	< 100	100
Nitrobeograe	< 100	100	Carbazole	< 100	100
isophorone	: < 100	100	Di-u-butylphthalate	< 100	: 100
bis(2-Chloroethoxy)methane	< 100	100	Fluoranthene	< 100	100
1,2,4-Trichlorobenzene	< 100	100	Benzidine	< 100	100
Nephthelene	< 100	100	Pyrene	< 100	100
4-Chlorosniline	< 100	100	3,3'-Dimethylbenzidine	< 100	
Hexachlorobutadiene	< 100	100	Butylbenzylphthaiato	< 100	100
2-Methylpaphthalene	< 100	100	3,3'-Dichlorobenzidine	< 100	100
Hexachlorocyclopentadiene	< 100	100	Benzo[a]anthracene	< 100	100
2-Chlorogaphthalose	< 100	100	Chrysene	< 100	100
2-Nitrogniliae	< 100	100	bis(2-Ethylhexyl)phthalate	< 100	100
Dimethylphthilate	< 100	100	Di-n-octylphthalate	< 100	100
2,6-Dinitrotoluene	< 100	100	Benzo[b]fluoranthene	< 100	100
Aconsphthylens	< 100	100	Benzo[k]fluoranthene	< 100	. 100
3-Nitroeniline	< 100	100	Benzo[a]pyrene	< 100	100
Accasphiliens	≥ 100	100	Indeno[1,2,3-od]pyrene	< 100	100
2_4-Dinitrotolisene	< 100	100	Dibenz[s,h]anthracene	< 100	100
Diberzofuras	< 100	100	Benzo(g,h,i]perylene	< 100	100

r - Qualifier

866300047

New Jorsey Cortified Lab# 14751

273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101 40 610¢ #2

Project Name: PVSC - MONITORING Lab Case Number: 10950 - 2903

MDL - METHOD DETECTION			< = LESS TH	IAN THE M
		TILES - ACIDS		
Lab ID : 2903-01	Me	thod 625		
			Date Sampled :	12/26/95
Client ID: 001			Time Sampled:	15:00
Matrix/Units:: Aqueous - μg/L Percent Moisture: 100		•	_ Date Analyzed :	1/11/96
Seldent Woltmie: 100			•	
Compound	Result Q	MDL		
Phenol	< 100	100		•
2-Chiorophenol	< 100	100		
2-Methylphenol	< 100	100	•	
4-Methylphenol	< 100	100		
Vitrophenoit	< 100	100		
z,4-Dimethylphenol	(100-	100		
Benzoic scid	20400	1000		
2,4-Dichiorophenol	< 100	100 :		
-Chloro 3-methylphenol	< 100	100		
2.4,6-Trichlorophenol	< 100	100		
2,4,5-Trichlorophenol	< 100	100		
2.4-Dinitrophenol 4-Nitrophenol	< 100 < 100	100		
4.6-Dinitro-2-methylphenol	< 100	100		
Pentachlorophenol	< 100	100		
entactiorophenoi	K 100	100		
†		TALS		_
	EPA S	eries 200		
ab ID : 2903-01 Client ID : 001	:		Date Sampled :	12/26/95
Astrix/Units: Aqueous - mg/L	•		Time Sampled :	15:00
ercent Moisture: 100	1		Date Analyzed:	1/11/96
i	, Theresia			
Compound	Result Q	MDL		
cad .	< 0.04	0.04		
inc	0.22	0.02	• •	

866300048

New Jersey Cecified Lab# 1475

ntegrated polytical Labs

Integrated Analytical Laboratories, Inc.

279 Franklin Road Randolphi, N.J. 07869

201 361-4252 Fax: 201 989-5288

fe Blue #2

ANALYTICAL DATA REPORT

Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: PVSC - MONITORING Lab Case Number: 10950 - 2903

MDL = METHOD DETECTION LIM	MDL = METHOD DETECTION LIMIT			< = Less than the mol			
	!	GENER	AL ANALYTICAL				
Lab ID : 2903-01	:			Date Sampled :	12/26/95		
Client ID: 001			•	Time Sampled :	15:00		
Matrix/Units : Aqueous - mg/L	•			·			
Percent Moisture: 100	*						
Compound (Method)	Result	Q	MDL	Date Analy	zed		
Biochemical Oxygen Demand (405.1)	18600		NA	[/2/96			
Trital Suspended Solids (160.2)	< 10.0		10.0	1/3/96			
<u> </u>	4	-					

Q = Quilifier

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

lichael H. Leftin, Ph.D. Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

866300049

New York Cerdiled Lab #11402

ACCREDITED LABORATORIES, INC... YOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER	2616
SAMPLE HUMBER	9506616
DATA FILE	>09873
CLIENT NAME	CC1
EIFID ID	WINFA:

HATRIX	Aqueous
DILUTION FACTOR	1.0
DATE EXTRACTED	
DATE ANALYZED	05/24/95
ANALYZED BY	LARRY

	2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2						
CAS #	COMPOUND	UG/L	HOL	CAS #	COMPOUND	UG/L	MOL
	******************	***********		*****			
107028	Acrolein	U	6.1	78875	1,2-0ichloropropane	u	-4
107131	Acrylanitrile	U	6.6	10061015	cis-1,3-Dichioropropene	U	.4
74873	Chloromethane	U	2.0	79016	Trichloroethene	U	.4
74839	Bromomethane	U	2.0	71432	Benzene	U	.4
75014	Vinyl Chloride	u	2.0	124481	Dibromochloromethane	U	.4
75003	Chloroethane	· u	2.0	79005	1,1,2-Trichloroethane	ü	.4
75092	Hethylene Chloride	บ	1.0	10061026	trans-1,3-0ichloropropene	u	.4
67641	Acetone	U	1.8	110758	2-Chioroethylvinylether	U	2.0
75150	Carbon Disulfide	Ú	.4	75252	Bromoform	U	.4
75694	Trichtorofluoromethane	u	.4	591786	2-Rexanone	u	.5
75354	1,1-Dichloroethene	Ū	.4	108101	4-Hethyl -2-pentanone	U	.7
75343	1,1-Dichloroethane	u	.4	127184	Tetrachloroethane	U	.4
	trans-1,2-Dichloroethene	Ü	.4	79345	1,1,2,2-Tetrachloroethane	ប	.6
156605	Chloroform	2.1	.4	108883	Toluene	U	.5
67663	1.2-Dichloroethane	u	.4	108907	Chlorobenzene	U	.4
107062		Ū	.4	100414	Ethylbenzene	U	1.0
78933	2-Butanone	ir	.4	100425	Styrene	u	.4
71556	1,1,1-Trichloroethane		.4	1330207	m.p-Kylene	U	z.8
56235	Carbon Tetrschloride			95476	o-Xylene	.8	2.1
108054	Vinyl Acetate	U	.8		•		
75274	Bromodichloromethane	u	.4	156592	cis-1,2-Dichloroethene	U	.4

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1.2-Dichioroethane-d4	102 %	76-114	_OK_
Toluene-d5	101 %	58-110	OK_
Bromofluorobenzene	101 %	86-115	_ox_

^{1 -} Indicates compound concentration found below MOL.

U - Indicates compound analyzed for but not detected.

^{8 -} Indicates compound found in associated blank.

W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

AUCHEDITED LABORATORIES, INC. BNA URGANIC ANALYSIS DATA

Case Number	2616	
SATPLE NUTBER	4586616	
ATA FILE	>F1694	
CLIENT NAME	iti	
FIELD ID	NINEA	

matrix	Fayeaus	
OTHER FACTOR	5	
DATE EXTRACTED	05/15/95	
DATE ANALYZED	05/25/45	
ANGLYZED BY	PAUL	

CAS ‡	CONFOLMO	いらん	MOL	CAS #	COPPUED	UGZL	FUL
108952	хахиских каких br>- Phenol	::::::::::::::::::::::::::::::::::::::	****** 50	95754	2,4,5-Trichiorophenol	Ü	299
95578	2-thlorophenol	Ū	50	51285	2,4-Dinitrophenol	Ü	250
45482	2-Methylphenol	វ	50	100027	4-Nitrophenol	IJ	259
198394	364-Methylphenol	ū	50	534521	4,5-Dinitro-2-methylahenoi	ij	254
3875 5	2-Ni tropheno l	- 0 لاد	56	3786 5	Pentach lorophenol	:j	259
1876/9	2,4-01me(hylphenol	ij	. 50	121142	2,4-Oinitrataluene	J	មព្
129832	2,4-Dichtarophenol	- ប	50	84662	Diethylphthalate	2	4;
111644	bis(-2-Chioroethyl)Ether	IJ	50	7095723	4-Chiorophenyi-phenyiather	ij.	₩ ₽
141/JI	1.3-Dichlor@Benzene	9	54	86737	Fluorene	3	* ;
35467	1,4-Otch!orphenzens	บ	58	100016	4-Nitroaniline	· J	259
197516	zenzul Alcanoi	ü	98	86386	N-Mitrosodiphanylemine	<u></u>	A7
-5591	1,2-Dichterobenzene	u	£3	101953	4-Grosconenyi-chenylether	.7	¥.
138571	aisk2-Uniarokadorodyikether	7.359 A		1147-1	Hausen Langi en zeña	3	p.2
2118-1	Newstrassediesessismins	IJ	**	36615	Phananthrana	3	54
	meyach: proethaps	ដ	÷ij	120127	Anthracane	.!	11
20,063	Nitrabenzane	ij	50	84742	Oz-n-Butyighthelate	2	नेपु
35.91	Isophorone	12	۶ų	286440	Fluoranthene	3	÷.;
:5851	Banzolo Acid	ប	250	129000	Pyrene	3	~9
113711	bis(-2-Chioroethoxy)Mathena	U	50	85487	Sutylbenzylphthalate		3.0
.29821	1,2,4-frichlorabenzene	វ	50	91941	i,F'-Grantanabenzidine	.7	1:0
-1203	Nagrithatere	ម	50	36953	Benzala : Anthrecene	<u>:</u>	- ij
1,76478	4-Chloroen: ine	-3	59	11/317	Bis(2-Ethylhexyl? "httm:/afe	9	- 0
₫7483	Hexach serobutaciana	ដ	50	219819	Chrysene	ij	÷ (
11576	2-Nethylnachthalene	ប	şą	117840	Di-n-octyl phthalate	ز:	ē j
17474	Hexachionocyclopentaciene	ij	90	295942.	Benzo(b) fluoranthene	3	83
41587	2-Interenaghthatiene	ឋ	90	207089	denzo(k)Fluoranthene	ម	54
98764	2-Nitroaniline	u	250	59328	Benzo(a/Pyrane	Ü	7.4
131113	Unmethy! Inthalate	Ţ	50	193345	Indend:1,2,5-cd:Pyrene	ប	~ ¹ j
198768	Acenaphthylene	ij	ÿΰ	53743	Dibenzola,hiAnthracere	·j	<u>i</u>
99g92	3-Nitroaniline	ដ	250	191242	Senzolg,h,i)Perylene	ij	ηij
33329	Aceneonthene	ij	50	62759	N-Witrosodimethylamine	ij	* 4
132549	Dipenzofuran	1	50	237329	2,4-Dinitrochloropenzene	ij	2599
686282	2.6-Dinitrotoluene	- 11	98	229715	2,5-Dinitrophenol	IJ	27-48
7998/	4-Chioro-J-methylphenol	U	50	38891	2,4,6-Trinitrophenoi	ij	2500
32962	2.4.a-Trichlorophenol	ij	50				

SURPOGAIS COMPUNES	FROMERY	0.80178	មុះជម្រើ
Nitrobenzene-ch	22 \$	35-114	:JK
2-Fluorobighenyl	<u> </u>	45-116	<u>'7K</u>
Terphenyl-414	682 %	33-141	DUT
Phono I-d5	43 %	18- 94	<u> 13K</u>
2-Fluorophenol	31 %	21-198	<u> </u>
2.4,6-frioromophenol	<u>l6 %</u>	19-123	_UK

 $[\]boldsymbol{B}$ - indicates compound found in associated blank.) - increates compound concentration found below MRL.

i - Indicates compound analyzed for but not detected.

W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Mater Quality Criteria from New Jersey Register dated February 1, 1993.

^{** 3-}Nethylphenol and 4-Nethylphenol can not be separated by the method applied

INDUSTRIAL CORROSION MANAGEMENT, Inc.

E1152 Route 10 Exandolph, NJ 07869 201-584-0330

TOBER 11, 1995

Certified for: NJ, PA, DE, CT, NY(DOH)

NJ #14116 NY #11376

US EPA CLP Lab

ANALYTICAL DATA REPORT PACKAGE

Client:

CHEMICAL COMPOUNDS, INC.

Sample Source:

Waste water

Sampled By:

Customer

SAMPLE ID:

LAI

DATE &

AT LAB

MATRIX

NUMBER

COLLECTED

DATE

NPD ML's

Aqueous

220698

.09/21/95 08:30

09/22/95

Supervisor/Manager Signature:

Recharg A

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Page # 2.

INDUSTRIAL CORROSION MANAGEMENT, INC.

and the profite and the contract of the contra

1152 Route 10 Randolph, NJ 07869 201-584-0330 OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH) NJ #14116 NY #11376 US EPA CLP Lab

PRIORITY POLLUTANT ACID FRACTION ANALYSIS BY GC/MS

wumber:

220698
CHEMICAL COMPOUNDS, INC.
Waste water
NPD ML's

Data File: >17063

Client:

Sample source: Sample ID: Sample date:

09/21/95

Extracted Date: Analysis Date:

09/26/95

Customer

09/26/95

Column: 30m SPB-5 Dilution Factor: 10

Sampled by: At lab date:

09/22/95 WATER

Init Sample vol= 50ml

Final volume= 10ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume)*Final Volume)*1000

Parameter	Result ug/l	Method Blank ug/l		Minimum Detection Limit ug/l
2-Chlorophenol 2-Nitrophenol 3-Nitrophenol 3-A-Dimethylphenol 3-A-Dichlorophenol 3-A-Trichlorophenol 3-A-Dinitrophenol 3-A-Dinitrophenol 4-Dinitro-2-methylphenol 4-Nitrophenol 3-Chloro-3-methylphenol 3-Chloro-3-methylphenol	ם מט מט מט מט מט מט מט מט מט מט מט מט מט	ממממממממממ	•	200 200 360 200 200 200 200 720 200 200

_ ug/l = micrograms/liter or ppb

J: Indicates a compound was analyzed for but not detected at the MDL.
J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.
B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.
ND: Not Determined.
IND: Indeterminable

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INDUSTRIAL CORROSION MANAGEMENT, INC. 1152 Route 10 Randolph, NJ 07869 201-584-0330

OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH) NJ #14116 NY #11376 US EPA CLP Lab

PRIORITY POLLUTANT BASE/NEUTRAL ANALYSIS BY GC/MS

Lab Number:

Client: CHEMICAL COMPOUNDS, INC.
Sample source: Waste water
Sample ID: NPD ML's
Sample date: 09/21/95 Extracted 220698

Data File: >17063

09/26/95 Extracted Date:

Sample date: Sampled by: At lab date:

Customer 09/22/95

Analysis Date: 09/26/95 Column: 30m SPB-5 Dilution Factor: 10

Matrix:

WATER

Init Sample vol= 50ml

Final volume= 10ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume) *Final Volume) *1000

	Result ug/l	Method Blank ug/l	Minimum Detection Limit ug/l
Parameter			
N-Nitrosodimethylamine	ŭ	ט ט	200 200
his(2-Chloroethyl)ether	ŭ	មី	480
1 3-Dichlorobenzene	ŭ	មី	460
1 4-Dichlorobenzene	u U	ŭ	480
1-Dichlorobenzene	Ü	ប	240
his (2-Chloroisopropyl) etner	g O	<u>й</u> ,	360
N-Nitroso-dl-n-propyramine	ū	, ŭ	580
Hexachloroethane		, A	200
Nitrobenzene	ប្	ชั	200
Temporone		បី	200
h/s/2-Chloroethoxy)methane	ប ប	ü	460
1,2,4-Trichlorobenzene		ប័	400
Nanhthalene	ā	a a	200
	ŭ	บี	300
achlorocyclopentaciene	ŭ	***	400
itoronaphthalene	<u>u</u> .	ប់	920
Dimethyl phthalate	ū	ชื่	300
Acenaphthylene	<u> </u>	ซี	200
2,6-Dinitrotoluene	<u>u</u>		380
Acenaphthene	<u>u</u>	<u>u</u>	200
2,4-Dinitrotoluene	<u>ת</u>	<u>U</u>	460
Diethyl phthalate	ឬ	<u>u</u>	400
4-Chlorophenyl phenyl ether	Ŭ	. <u>U</u>	340
Fluorene	U	, ŭ	
se sel amanadámhansel ami na	Ū	ប៊	200
1,2-Diphenylhydrazine (Azobenzene)	ש	ប	200
4-Bromophenyl phenyl ether	ט	ਧ	380
Hexachlorobenzene	U	ប៊	380
Phenanthrene	ט	ប	180
	ט	σ	160
Anthracene	U	ប	500
Di-n-butylphthalate	ט	Ŭ	120
Fluoranthene	บ	σ .	200
Benzidine	Ū	ប	100
Pyrene	Ū	σ	240
KULAI USUSAIDUCHGIGA	σ	ប៊	200
3,3'-Dichlorobenzidine	Ŭ	Ū	100
Benzo (a) anthracene	Ū	υ	100
Chrysene	ŭ	บั	600
bis(2-Ethylhexyl)phthalate	Ŭ	ਹੱ	200
Di-n-octylphthalate	ŭ	Ū	140
Benzo (b) fluoranthene	~	_	

ug/l = micrograms/liter or ppb

U: Indicates a compound was analyzed for but not detected at the MDL.
J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.
B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.
ND: Not Determined.
IND: Indeterminable

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11

INDUSTRIAL CORROSION MANAGEMENT, INC.

1152 Route 10 Randolph, NJ 07869 201-584-0330 OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH) NJ #14116 NY #11376 US EPA CLP Lab

PRIORITY POLLUTANT BASE/NEUTRAL ANALYSIS BY GC/MS

(Continued)

agricultura de la cultura de la compansa de la com

Additional Base/Neutral Targeted Compounds

Lab Number: 220698
Client: CHEMICAL COMPOUNDS, INC.
Sample source: Waste water
Sample ID: NPD ML's
Sample date: 09/21/95 Extracte

Data File: >17063

Sample ID: Sample date:

Customer

Extracted Date: Analysis Date:

09/26/95 09/26/95

Column: 30m SPB-5 Dilution Factor: 10

Sampled by: At lab date: Matrix:

09/22/95

Final volume= 10ml

WATER

Init Sample vol= 50ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume) *Final Volume) *1000

Parameter	Result ug/l	Method Blank ug/l	Minimum Detection Limit ug/l
Benzo(k) fluoranthene Benzo(a) pyrene Indeno(1,2,3-cd) pyrene Dibenz(a,h) anthracene Benzo(g,h,i) perylene	ช ช ช ช	n n n	140 100 220 100 100

ug/l = micrograms/liter or ppb

U: Indicates a compound was analyzed for but not detected at the MDL.
J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.
B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.
ND: Not Determined.
IND: Indeterminable

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273 Frenklin Road Randolph, N.J. 07869 201 361-4252 Fax: 201 989-5298

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07181

Project Name: INTERNAL MONITORING Lab Case Number: 10950 - 2640

MDL - METHOD DETECTION L	MIT			< = LESS 1	HAN THE MD
MDL - METHOD BEISELVEL		Ϋ́	OLATILES		
Lab ID: 2640-01-				Date Sampled:	11/17/95
Client ID: 001				Time Sampled:	11:30
Matrix/Units: Aqueous - µg/L	•			Date Analyzed:	11/28/95
Percent Moisture: 100					
Percent promote. 100				١ .	
Compound	Conc.	MDL	Compound	Conc.	MDL
Chloromethane	< 50	50	Bromodichloromethane	< 50	50
Vinyl chloride	< 50	50	2-Chloroethylvinyl ether	< 50	50
Bromomethane	< 50	50	cis-1.3-Dichloropropens	< 50	50
	< 50	50	Toluene	< 50	50
Chloroethane	< 50	50	trans-1,3-Dichloropropens	< 50	50
Trichlorofluoromethane	< 50	50	1.1.2-Trichloroethane	< 50	50
1,1-Dichlorosthene	< 100	100	Tetrachloroethene	< 50	50
Methylene chloride	< 50	50	Dibromochloromethane	< 50	50
trans-1,2-Dichlorosthone	< 50	50	Chlorobenzene *	2810	50
1,1-Dichloroethane	< 50	50	Ethylbenzese	< 50	50
Chloroform	< 50	50	Xyienes, total	*49100	2000
1,1,1-Trichloroethene		50	Bromoforms	< 50	50
Carbon tetrachloride	< 50		—	< 50	50
1,2-Dichloroethans	< 50	50	1,1,2,2-Tetrachioroethage	< 50	50 50
Benzese	< 50	50	1,3-Dichlorobenzene		50 50
Trichloroethene	< 50	50	1,4-Dichlorobenzene	< 50	
1.2-Dichloropropess	< 50	50	1,2-Dichlorobeazene	169	`50

^{*}Result from diluted Sample Analysis.

Continued on next page.

YELLOW #2 PURE"

New Jarsey Certified Labs 14751

New York Certified Lab #11402



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ANALYTICAL DATA REPORT

for Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07181

Project Name: INTERNAL MONITORING Lab Case Number: 10950 - 2640

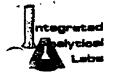
MDL = METHOD DETECTION LIM	TT .			< - LESS T	HAN THE MOL
MDL = METROD DETECTION CAN	5	EMIVO	LATILES (BNA)		
* 1 ** 4610.01 =	<i>(</i> "			Date Sampled:	11/17/95
Lab ID: 2640-01 -				Time Sampled:	
Client ID: 001				Date Analyzed :	
Matrix/Units: Aqueous - µg/L					
Percent Moisture: 100			_		NOT
Compound	Conc.	MDL	Compound	Conc.	MDL
3-Nitroeniline	< 100	100	Carbazole	< 100	100
Acenaphthone	< 100	100	Di-n-butylphthalate	< 100	100
2,4-Dinitrophenol	< 100	100	Pluoranthene	< 100	100
4-Nitrophesol	< 100	100	Benzidine	< 100	100
2.4-Dinitrotoluene	< 100	100	Pyreae	< 100	100
Dibenzofurag	< 100		3,3'-Dimethylbenzidine	< 100	100
Diethylphthalate	< 100	100	Butyibeazylphthelate	< 100	100
Fluorene	< 100	100	3.3'-Dichlorobenzidine	< 100	100
4-Chlorophenyl-phenylether	< 100	100	Benzo[a]anthracene	< 100	100
4-Nitronniline	< 100	100	Chrysene	< 100	001
4,6-Dinitro-2-methylphenol	< 100	100	bis(2-Ethylhexyl)phthalate	< 100	100
N-Nitrosodiphenylamine	< 100	100	Di-n-octylphthalate	< 100	100
1,2-Diphenylhydrazine/Azobenzene	< 100	100	Benzo[b]fluoranthene	< 100	100
4-Bromophenyl-phenylether	< 100	100	Benzo[k]fluoranthene	< 100	100
Hexachiorobenzens	< 100	100	Вепао(а/рутеле	< 100	100
Pentachlorophenol	< 100	100	Indeno(1,2,3-cd]pyrene	< 100	100
-	< 100	100	Dibenz[a,h]anthracene	< 100	100
Phonanthrone	< 100	100	Benzo(g,b,i]perylene	< 100	100
Anthracene	~ 100	100	Trems(#1mtellhas) sees.		

YEllow #2 "PURE"

New Jersey Certified Lab# 14751

New York Certified Lab # 11402

Control was a control was an experience



Integrated Analytical Laboratories, Inc.

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ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: INTERNAL MONITORING Lab Case Number: 10950 - 2640

MDL - METHOD DETECTION LIM	П		< = LESS TH/	N THE M
WELL THE PERSON	(s	EMIVOLATILES (BNA)		
Lab ID: 2640-01 ~			Date Sampled: 1	
Client ID: 001			Time Sampled: 1	
Matrix/Units: Aqueous - µg/L			Dets Analyzed: 1	1/28/95
Percent Moisture: 100				
Compound	Conc.	MDL Compound	Conc.	MDL
•	< 100	100 bis(2-Chloroethoxy)methan	< 100	100
N-Nitrosodimethylamine	< 100	100 Benzoic scid	< 500	500
Phonol	< 100	100 2,4-Dimethylaniline	< 100	100
Aniline	< 100	100 2,4-Dichlorophenol	< 100	100
bis(2-Chloroethyl)ether	496	100 1.2.4-Trichlorobenzene	< 100	100
2-Chlorophenol	< 100	100 Naphthalone	< 100	100
1,3-Dichlorobenzene	< 100	100 4-Chlorosnilins	< 100	100
1,4-Dichlorobenzene	< 100	100 Hexachlorobutadiene	< 100	100
Benzyl alcohol	< 100	100 4-Chloro-3-methylphenol	< 100	100
1,2-Dichlorobenzone	< 100	100 2-Methylasphthelene	< 100	100
2-Methylphenol	< 100	100 Hexachlorocyclopentadiene	< 100	100
bis(2-chloroisopropyl)wther	< 100	100 2,4,6-Trichlomphenol	< 100	100
4-Methylphenol	< 100	100 2.4.5-Trichlorophenol	< 100	100
N-Nitroso-di-o-propylamina	< 100	100 2-Chloropaphthalens	< 100	100
2-Aminotoluene +4-Aminotoluene	< 100	100 2-Nitroeniline	5510	100
Hexachloroethans	259	100 Dimethylphthalate	< 100	100
Nitrobenzone	< 100	100 2,6-Dinitrotoluene	< 100	100
Isophorone	3380	100 Accomplishylene	< 160	100
2-Nitrophenol		100 Accampanayasse	7 222	•
2.4-Dimethylphenol	< 100	100		

Continued on next page.

Yellow #2 PURE

New Jersey Certified Lab# 14751



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YELLOW #4

ANALYTICAL DATA REPORT

ussical Compounds Inc. 23-75 Riverside Ave. Newark, NJ 07101

Project Name: PVSC MONITORING Lab Case Number: 10950 - 2439

	LIMIT			< = LESS TI	IAN THE M
MDL = METHOD DETECTION	·		LATILES ethod 624		
Lab ID: 2639-001 Client ID: 001 Matrix/Units: Aqueous - µg/L Percent Moieture: 100				Date Sampled: Time Sampled: Date Analyzed:	11:30
Compound	Come. Q	MEDIL	Compound Bromodichloromethane	. Comc. Q 50 >	, MDL. 50
Chloromethans	< 50	50 50	2-Chloroethyl Vinyl Ether	< 50	50
Vinyl Chloride	< 50 < 50	50 50	cis-1.3-Dichloropropens	< 50	50
lromomethane	< 50 < 50	50	Tolvene	< 50	50
hlorosthese	< 50	50 50	trans-1,3-Dichloropropone	· < 50	50
Trickloro(luorosesthese	< 50	50	1,1,2-Trichloroethane	< 50	50
,1-Dichlorosthens	< 100	100	Tetrachiorosthone	< 50	50
dethylene Chloride	< 50	50	Dibromochloromethane	< 50	50
race-1,2-Dicklorosthese	< 50	50	Chlorobenzens	< 50	50
1-Dichloroethane	53.1	50	Ethylbenzese	< 50	50
Chloroform	< 50 111	50	Total Xylunes	260	50
1,1,1-Tricklomethens	< 50	50	Brospoforus	< 50	50
Carbon Tetrachlorida	7200*	200	1,1,2,2-Tetrachioroethane	< 50	50
i,2-Dichloroschess -	< 50	50	1,3-Dichlorobenzens	< 50	50
Benzene	< 50	50	1,4-Dichlorobenzese	< 50	50
Trichlorosthems 1,2-Dichloropropuss	< 50	50	1,2-Dichlorobenzane	< 50	50

TOTAL CYANIDE Method 335.2

Lab ID : 2639-001

Client ID: 001

Matrix/Units : Aqueous - mg/L Percent Moisture: 100

Result

MDL

< 0.05

0.05

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Laboratory Director

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New Jersey Certified Lab # 14751

New York Certified Lab # 11402

Date Sampled: 11/17/95

Date Analyzed: 11/28/95

Time Sampled: 11:30



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ANALYTICAL DATA REPORT

Chamical Campounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: PVSC - MONITORING Lab Case Number: 10958 - 2638

HO YELLOW * 4

MDL - METHOD DETECTION I	JMIT			< - LESS TH	AN THE M
		SE	LATILES - ACIDS		
			Method 625		
Lab ID : 2638-001				Date Sampled :	11/17/95
Client ID: 00f	•			Time Sampled ;	11:30
Matrix/Units : Aqueous - µg/L				Date Analyzed :	11/28/95
Percent Moisters: 100					·
Compound	Result	Q	MDL		
Phanol	< 100		100		
2-Chlorophenol	< 100		100	:	•
2-Methylphenol	< 100		100	•	
Methylphanoi	< 100		j 100		
2-Nitrophenol	< 100		100		
2,4-Dimethylphenol	< 100		100		
Benzoic zoid	< 500		500		
7,4-Dicklorophenol	< 100		100		
4-Chloro-3-methylphenol	< 100		100		
2,4,6-Trichlorophenal	< 100		100		
4,5-Trichlorophenol	< 100		100		
2.4-Dinitrophenol	< 100		100		
l-Nitrophenol	< 100		100		
1,6-Dinitro-2-methylphenol	< 100		100		
restachlorophesol	< 100		100		
			METALS		<u></u>
			A Series 200		
lab ID : 2638-001				Date Sampled :	11/17/95
Client ID : 001				Time Sampled :	11:30
datrix/Units : Aqueous - mg/L				Date Analyzad :	11/22/95
Percent Moisture: 100				•	_
Compound	Result	Q	MDL		
and	0.15		0.04		
Linc	0.53		0.02		

All NJDEP protocol were followed during analyses. These data have been reviewed and ac

Michael H. Leftin, Ph. Laboratory Director

The liability of lategrated Analytical Laboratories, Iac. is limited to the actual cost of the analyses performed.

New Jersey Cartified Lab# 14751

New York Cardified Lab # 11402.



Integrated Analytical Laboratories, Inc.

273 Franklin Road Randolph, N.J. 07869

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ANALYTICAL DATA REPORT

for

Chemical Compounds, Inc. 29-75 Riverside Ave. Newark, NJ 07101

However 4

Project Name: PVSC - MONITORING Lab Case Number : 10950 - 2638

MDL - METHOD DETECTION I	IMIT				< = LESS 1	HAI	THE MDL
MUCCO		MIV	NI ATTI I	es - Base Neutrals			
•	L.	4488 A .		shod 625			
	•		114		Date Sampled :		11/17/95
Lab ID : 2638-001					Time Sampled :		11:30
Client ID: 001				1	Date Analyzed :		11/28/95
Matrix/Units : Aqueous - µg/L					•		
Percent Moisture: 100			•	_	_	_	\m
a	Conc.	Q	MDL	Compound	Conc.	Q	MDL
Compound		•	100	Diethylphthalate	· < 100		100
N-Nitrosodimethylamine	< 100		100	Fluoress	< 100		100
Azilise .	< 100		400	4-Chlorophenyl-phenylether	< 100		100
bis(Z-Chloroethyi)ether 🔭	*47600		· 100	4-Nitmaniline	< 100		100
1,3-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100		100
1,4-Dichlorobenzene	< 100		100	1.2-Diphenylhydrazine/Azobenze	ma < 100		100
Benzyl sicobol	< 100		100	4-Bromophenyl-phenylether	< 100		100
1,2-Dichlorobenzene	< 100 < 100		100	Hezachlorobeszene	< 100		100
bis(2-chloroisopropyl)ether	< 100		100	Phenanthrens	< 100		100
N-Nitroso-di-a-propylamine			100	Anthracete	< 100		100
Hexachlorosthane	< 100 < 100		100	Carbazola	< 100		100
Nitrobenzene	< 100		100	Di-g-butyiphthainte	< 100		100
Leophorone	< 100		100	Fluoranthene	< 100		100
bis(2-Chloroethoxy)methane	< 100		100	Renziding	< 100		100
1,2,4-Trichlorobenzene	< 100		100	Pyrepe	< 100		100
Naphthaloue	< 100		100	3.3'-Dimethylbenzidine	< 100		100
4-Chlorosmiline	< 100		100	Buty ibenzyiphthalass	< 100		100
Hexechiorobutadione	< 100		100	3,3'-Dichlorobenzidios	< 100		100
2-Methylnephthslene			100	Benzo(a lanthracens	< 100		100
Hexachlorocyclopentediens	< 100		100	Chrysens	< 100		100
2-Chloronaphthaions	< 100 < 100		100	bis(2-Ethythexyl)phthslate	107		100
2-Nitrossiline			100	Di-a-octylphthalass	< 100		100
Dimethylphthalate	< 100 < 100		100	Benzo(b)(luoranthene	< 100		100
2,6-Dinitrotolucae	< 100 < 100		100	Benzo(k)fluoranthens	< 100		100
Acensphthyless	< 100 < 100		100	Beazo(a)pyreas	< 100		100
3-Nitronniline	< 100		100	Indeno[1,2,3-od]pyrens	< 100		100
Acenephthene	< 100		100	Dibenz(a,h)anthracene	·< 100		100
2,4-Dinitrotoluene	< 100		100	Beozo(g,h,i)peryiene	< 100		100
Dibeazofures	< 100		100	Const. (Time likes) seems			

Q - Qualifier

Continued on the next page.

New York Cartified Lab # 11462

New Jersey Cartified Labe 14751

^{· ...} Result from diluted analysis.



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ANALYTICAL DATA REPORT

DNHA = #13

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

ADL = METHOD DETECTION	LIMIT			< = LESS T	HAN THE ME
ADL = METHOD DETECTION		V	CLATILES		
ab ID: 1719-002		•		Date Sampled: Time Sampled:	8/9/95 11:00
Client ID: 002				Date Analyzed:	k715/95
Astrix/Units: Aqueous - μg/L		•		Date Analysis.	
Compound	Conc.		Compound	Conc.	MDL
Thioromethane	< 100	100	Bromodichloromethane	< 100	100
inyl chloride	< 100	100	2-Chioroethylvinyl ether	< 100	100
romomethane	< 100	100	cis-1,3-Dichloropropene	< 100	100
hloroethans	< 100	100	Toluene	< 100	100
richlorofluoromethane	< 100	100	trans-1,3-Dichloropropens	< 100	100
.1-Dichloroethene	< 100	100	1,1,2-Trichloroethane	< 100	100
/ethylene chloride	< 200	200	Tetrachioroethene	< 100	100
rans-1,2-Dichloroethene	< 100	100	Dibromochloromethane	< 100	100
.1-Dichloroethane	< 100	100	Chlorobenzene	< 100	100
hloroform	< 100	100	Ethylbenzene	< 100	100
	< 100	100	Xylenes, total	< 100	100
,1,1-Trichloroethane	< 100	100	Bromoform	< 100	100
Carbon tetrachloride	< 100	100	1.1.2.2-Tetrachloroethane	< 100	100
,2-Dichloroethane	< 100	100	1.3-Dichlorobenzene	< 100	100
Benzene .	< 100	100	1,4-Dichlorobenzene	< 100	100
Trichloroethene 1,2-Dichloropropane	< 100		1,2-Dichlorobenzene	< 100	100
		1/ Y	DENTIFIED COMPOUNDS		••
	TENTATIV	ELX 1	DEALIFIED COME COURS	Date Sampled:	8/9/95
Lab ID: 1719-002				Time Sampled:	11:00
Client ID: 002				Date Analyzed:	8/15/95
Matrix/Units: Aqueous - µg/L				Date charyant.	10.75
	•		ESTIMATED	RETENTIC	N
CAS#	COMPOUND		CONCENTRATION	TIME	
•	Unknows		146000	5.82	•

Continued on next page.

New Jersey Certified Lab#-14751



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'ANALYTICAL DATA REPORT

DNHA- #13

for Chemical Compounds Inc. 29-75 Riverside Ave.. Newark, NJ 07101

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL - METHOD DETECTION LIN	/IT		< = LESS T	HAN THE MDL
		ASE NEUTRALS ACIDS		
Lab ID: 1719-002 Client ID: 002 Matrix/Units: Aqueous - μg/L			Date Sampled : Time Sampled : Date Analyzed :	11:00
Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine Phenol Aniline bis(2-Chloroethyl)ether 2-Chlorophenol 1,3-Dichlorobenzene 1,4-Dichlorobenzene Benzyl alcohol 1,2-Dichlorobenzene 2-Methylphenol bis(2-chloroisopropyl)ether 4-Methylphenol N-Nitroso-di-n-propylamine 2-Aminotoluene +4-Aminotoluene Hexachloroethane Nitrobenzene Isophorone 2-Nitrophenol	< 160.0 < 160.0	160.0 bis(2-Chloroethoxy)methane 160.0 Benzoic acid 160.0 2,4-Dimethylaniline 160.0 1,2,4-Trichlorophenol 160.0 Naphthalene 160.0 4-Chloroaniline 160.0 Hexachlorobutadiene 160.0 4-Chloro-3-methylphenol 160.0 2-Methylnaphthalene 160.0 Hexachlorocyclopentadiene 160.0 Hexachlorocyclopentadiene 160.0 2,4,6-Trichlorophenol 160.0 2,4,5-Trichlorophenol 160.0 2-Chloronaphthalene 160.0 Dimethylphthalate 160.0 Dimethylphthalate 160.0 Acenaphthylene	< 160.0 < 800.0 < 160.0 < 160.0	160.0 800.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0 160.0
2,4-Dimethylphenol	< 160.0	160.0		

Continued on next page.



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'ANALYTICAL DATA REPORT'

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION LIM	ÍΠ			< = LESS T	HAN THE MDI
		ASE NEUTRALS ACIDS			•
Lab ID: 1719-002 Client ID: 002 Matrix/Units: Aqueous - µg/L				Date Sampled: Time Sampled: Date Analyzed:	11:00
Compound	Conc.	MDL Compound	4.6	Conc.	MDL
3-Nitroaniline	< 160.0	160.0 Carbazole		< 160.0	160.0
Acenaphthene	< 160.0	160.0 Di-a-butylphthalate		< 160.0	160.0
2.4-Dinitrophenol	12100	160.0 Fluoranthene		< 160.0	160.0
4-Nitrophenol	< 160.0	160.0 Benzidine		< 160.0	160.0
2.4-Dinitrotoluene	< 160.0	160.0 Pyrene		< 160.0	160.0
Dibenzofuran	< 160.0	160.0 3,3'-Dimethylbenzidine		< 160.0	160.0
Diethylphthalate	< 160.0	160.0 Butylbenzylphthalate		< 160.0	160.0
Fluorene	< 160.0	160.0 3,3'-Dichlorobenzidine		< 160.0	160.0
4-Chlorophenyl-phenylether	< 160.0	160.0 Benzo(a]anthracene		< 160.0	160.0
4-Nitroeniline	< 160.0	160.0 Chrysene		< 160.0	160.0
4.6-Dinitro-2-methylphenol	< 160.0	160.0 bis(2-Ethylhexyl)phthalate		< 160.0	·· 160.0
N-Nitrosodiphenylamine	< 160.0	160.0 Di-n-octylphthalate		< 160.0	160.0
1,2-Diphenylhydrazine/Azobenzene	< 160.0	160.0 Benzo[b]fluoranthene		< 160.0	160.0
4-Bromophenyl-phenylether	< 160.0	160.0 Benzo[k]fluoranthene		< 160.0	160.0
Hexachiorobenzene	< 160.0	160.0 Benzo[a]pyrene		< 160.0	160.0
Pentachlorophenol	< 160.0	160.0 Indeno[1,2,3-cd]pyrene		< 160.0	160.0
Phenanthrene	< 160.0	160.0 Dibenz[a,h]anthracene		< 160.0	160.0
Anthracene	< 160.0	160.0 Benzo[g,h,i]perylene		< 160.0	160.0

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D. Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab#-14751



273 Franklin Road Randolph, N.J. 07869

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ANALYTICAL DATA REPORT

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION L	MIT				< = LESS T	HAN THE M
		V	OLATILES			
Lab ID: 1719-001				Da	te Sampled:	8/9/95
Client ID: 001				Tir	ne Sampled:	11:00
Matrix/Units: Aqueous - μg/L				Dai	e Analyzed:	8/15/95
Compound	Сопс.	MDL	Compound	ŧ	Conc.	MDL
Chioromethane	< 100	100	Bromodichloromethane		< 100	100
Vinyl chloride	< 100	100	2-Chloroethylvinyl ether		< 100	100
Bromomethane	< 100	100	cis-1,3-Dichloropropene		< 100	100
Chloroethane	< 100	100	Toluene		< 100	100
Trichlorofluoromethane	< 100	100	trans-1,3-Dichloropropene		< 100	100
1,1-Dichloroethene	< 100	100	1,1,2-Trichloroethane		< 100	100
Methylene chioride	< 200	200	Tetrachloroethene		< 100	100
trans-1,2-Dichloroethene	< 100	100	Dibromochloromethane		< 100	100
1.1-Dichloroethane	< 100	100	Chlorobenzene		< 100	100
Chloroform	< 100	100	Ethylbenzene		< 100	100
1.1.1-Trichloroethane	< 100	100	Xylenes, total		< 100	100
Carbon tetrachloride	< 100	100	Bromoform		< 100	100
1,2-Dichloroethane	< 100	100	1,1,2,2-Tetrachioroethane		< 100	100
Велисто	< 100	100	1,3-Dichlorobenzene		< 100	100
Trichloroethene	< 100	100	1,4-Dichlorobenzene		< 100	100
1.2-Dichloropropane	< 100	100	1,2-Dichlorobenzene		< 100	100

TENTATIVELY IDENTIFIED COMPOUNDS

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - μg/L

Date Sampled:

8/9/95

Time Sampled:

11:00 8/15/95

Date Analyzed:

CAS#

COMPOUND

ESTIMATED CONCENTRATION RETENTION TIME

Unknown

158000

5.76

New Jersey Certified Lab#-14751: .



273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fax: 201 989-5268

ANALYTICAL DATA REPORT

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

YELOW5, #13

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION LIM	iΤ			< = LESS T	HAN THE MDL
MDL = METHOD Detection	В	ASE NEUTRALS ACIDS			
Lab ID: 1719-001 Client ID: 001 Matrix/Units: Aqueous - µg/L		,		Date Sampled: Time Sampled: Date Analyzed:	11:00 8/15/95
Compound	Conc.	MDL Compound	s.k	Conc.	MDL
N-Nitrosodimethylamine Phenol Aniline bis(2-Chloroethyl)ether 2-Chlorophenol 1,3-Dichlorobenzene 1,4-Dichlorobenzene Benzyl alcohol 1,2-Dichlorobenzene 2-Methylphenol bis(2-chloroisopropyl)ether 4-Methylphenol N-Nitroso-di-n-propylamine 2-Aminotoluene +4-Aminotoluene Hexachloroethane Nitrobenzene	< 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0 < 40.0	40.0 bis(2-Chloroethoxy)methane 40.0 Benzoic acid 40.0 2,4-Dimethylaniline 40.0 1,2,4-Trichlorobenzene 40.0 Naphthalene 40.0 4-Chloroaniline 40.0 Hexachlorobutadiene 40.0 2-Methylnaphthalene 40.0 Exachlorocyclopentadiene 40.0 2,4,6-Trichlorophenol 40.0 2,4,5-Trichlorophenol 40.0 2-Chloroaphthalene 40.0 2-Chloronaphthalene 40.0 Dimethylphthalate 40.0 Dimethylphthalate		< 40.0 < 200.0 < 40.0 < 40.0 44.2 < 40.0 < 40.0	40.0 200.0 40.0 40.0 40.0 40.0 40.0 40.0 40.0 40.0 40.0 40.0 40.0 40.0
Isophorono 2-Nitrophenol 2.4-Dimethylphenol	< 40.0 < 40.0	40.0 Acenaphthylene 40.0		< 40.0	40.0-

Continued on next page.

New Jersey Certified Lab# 14751

866300067



Integrated Analytical Laboratories, Inc.

273 Franklin Road Randolph, N.J. 07869 201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: SELF-MONITORING Lab Case Number: 10950 - 1719 VELLOW#15, Ba#13

MDL = METHOD DETECTION LIN	< = LESS THAN THE M			
		ASE NEUTRALS ACIDS		
Lab ID: 1719-001 Client ID: 001 Matrix/Units: Aqueous - μg/L			Time Sampled: 1	1/9/95 1:00 1/15/95
Compound	Conc.	MDL Compound	* Conc.	MDL
3-Nitroaniline	< 40.0	40.0 Carbazole	< 40.0	40.0
Acenaphthene -	< 40.0	40.0 Di-a-butylphthalate	< 40.0	40.0
2,4-Dinitrophenol	< 40.0	40.0 Fluoranthene	< 40.0	40.0
4-Nitrophegoi	< 40.0	40.0 Benzidine	< 40.0	40.0
2.4-Dinitrotoluene	< 40.0	40.0 Pyrene	< 40.0	40.0
Dibenzofuran	< 40.0	40.0 3,3'-Dimethylbenzidine	< 40.0	40.0
Diethylphthalate	< 40.0	40.0 Butylbenzylphthalate	< 40.0	40.0
Fluorene	< 40.0	40.0 3,3'-Dichlorobenzidine	< 40.0	40.0
4-Chlorophenyl-phenylether	< 40.0	40.0 Benzo[a]anthracene	< 40.0	40.0
4-Nitrosniline	< 40.0	40.0 Chrysene	< 40.0	40.0
4,6-Dinitro-2-methylphenol	< 40.0	40.0 bis(2-Ethylhexyl)phthalate	< 40.0	40.0
N-Nitrosodiphenylamine	< 40.0	40.0 Di-n-octylphthalate	< 40.0	40.0
1,2-Diphenylhydrazine/Azobenzene	< 40.0	40.0 Benzo[b]fluoranthene	< 40.0	40.0
4-Bromophenyl-phenylether	< 40.0	40.0 Benzo[k]fluoranthene	< 40.0	40.0
Hexachlorobenzene	< 40.0	40.0 Benzo[a]pyrene	< 40.0	40.0
Pentachlorophenol	< 40.0	40.0 Indeno[1,2,3-cd]pyrene	< 40.0	40.0
Phenanthrene	< 40.0	40.0 Dibenz[a,h]anthracene	< 40.0	40.0
Anthracene	< 40.0	40.0 Benzo[g,h,i]perylene	< 40.0	40.0

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D. Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751.



273 Franklin Road Randolph, N.J. 07869

201 361-4252 Fex: 201 989-5288

ANALYTICAL DATA REPORT

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: Internal Monitoring Lab Case Number: 10950 - 1439

					_
IMIT			-	< = LESS T	HAN THE M
	VOLAT	ILES - (601/602)			
				Date Sampled:	7/7/95
				Time Sampled:	14:00
				Date Analyzed:	7/12/95
Conc.	MDL	Compound	4.	Conc.	MODL
< 50.0	50.0	Bromodichloromethane		< 50.0	50 .0
< 50.0	50.0	2-Chloroethylvinyl ether		< 50.0	50.0
< 50.0	50.0	cis-1,3-Dichloropropene		< 50.0	50.0
< 50.0	50.0	Toluene		< 50.0	50.0
< 50.0	50.0	trans-1,3-Dichloropropene		< 50.0	50.0
< 50.0	50.0	1,1,2-Trichloroethane		< 50.0	50.0
< 100.0	100.0	Tetrachioroethene		< 50.0	50.0
< 50.0	50.0	Dibromochloromethane		< 50.0	50.0
< 50.0	50.0	Chlorobenzene		< 50.0	50.0
< 50.0	50.0	Ethylbenzene		< 50.0	50.0
< 50.0	50.0	Xylenes, total		< 50.0	50.0
< 50.0	50.0	Bromoform		< 50.0	50.0
< 50.0	50.0	1,1,2,2-Tetrachioroethane		< 50.0	50.0
< 50.0	50.0	1,3-Dichlorobenzene		< 50.0	50.0
< 50.0	50.0	1,4-Dichlorobenzene		< 50.0	50.0
< 50.0	50.0	1,2-Dichlorobenzene		< 50.0	50.0
	< 50.0 < 50.0 < 50.0 < 50.0 < 50.0 < 100.0 < 50.0 < 50.0 < 50.0 < 50.0 < 50.0 < 50.0 < 50.0	Conc. MDL < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0 < 50.0 50.0	Conc. MDL Compound	Conc. MDL Compound Compou	VOLATILES - (601/602) Date Sampled: Time Sampled: Date Analyzed: Conc. MDL Compound Conc. < 50.0 50.0 Bromodichloromethane < 50.0 < 50.0 50.0 2-Chloroethylvinyl ether < 50.0 < 50.0 50.0 cis-1,3-Dichloropropene < 50.0 < 50.0 50.0 Toluene < 50.0 < 50.0 50.0 trans-1,3-Dichloropropene < 50.0 < 50.0 50.0 1,1,2-Trichloroethane < 50.0 < 100.0 100.0 Tetrachloroethene < 50.0 < 50.0 50.0 Dibromochloromethane < 50.0 < 50.0 50.0 Ethylbenzene < 50.0 < 50.0 50.0 Ethylbenzene < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Bromoform < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 50.0 Sulphonochloromethane < 50.0 < 50.0 Sulphonochloromethane < 50.0 < 50.0 Sulphonochloromethane < 50.0 < 50.0 Sulphonochloromethane < 50.0

TOTAL CYANIDE

Lab ID: 1439-001

Client ID: 001 Matrix/Units: Aqueouş

MDL

Date Sampled: 7/7/95 Time Sampled: 14:00 Date Analyzed: 7/12/95

Result

< 0.05 0.05 .

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751



273 Franklin Road Randolph, N.J. 07869 201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: Self-Monitoring Lab Case Number: 10950 - 1438 NOPD

Date Sampled: 7777 Date Sampled: 7777 Date Sampled: 7775 Date Sampled: 7777 Date Sampled: 7775 Date Analyzed: 7775 Da	THE MDL
Date Sampled: 7/7/5	
Client ID : 001 Matrix/Units : Aqueous - μg/L Date Analyzed : 7/15	95
Compound Conc. MDL Compound Conc. N-Nitrosodimethylamine < 50.0 50.0 Diethylphthalate < 50.0 So.0 Diethylphthalate < 50.0 So.0 Diethylphthalate < 50.0 So.0 Fluorene < 50.0 So.0 Fluorene < 50.0 So.0 Fluorene < 50.0 So.0 Fluorene < 50.0 So.0 A-Chlorophenyl-phenylether < 50.0 So.0 So.0 A-Nitrosodiphenylamine < 50.0 So.0 So.0 So.0 A-Nitrosodiphenylamine < 50.0 So.0 S	0
Compound Conc. MDL Compound Conc.	/95
N-Nitrosodimethylamine	MDL
N-Nitrosodimethylamine	
Aniline	50.0
1,3-Dichlorobenzene	50.0
1,3-Dichlorobenzene < 50.0	50.0
1,4-Dichlorobenzene	50.0
Senzyl alcohol Color Sol. 1,2-Diphenylnyarzine/Azotenzele Color	50.0
1,2-Dichlorobenzene < 50.0	50.0
bis(2-chloroisopropyl)ether < 50.0	50.0
N-Nitroso-di-n-propylamine < 50.0 50.0 Phenanthrene < 50.0 Hexachloroethane < 50.0	50.0
Hexachloroethane	50.0
Nitrobenzene < 50.0	50.0
Isophorone	50.0
bis(2-Chloroethoxy)methane < 50.0	50.0
1,2,4-Trichlorobenzene < 50.0	50.0
Naphthalene < 50.0 50.0 Pyrene < 50.0 4-Chloroaniline < 50.0	50.0
4-Chloroaniline < 50.0 50.0 3,3*-Dimethyloenzidine < 50.0 Hexachlorobutadiene < 50.0 50.0 Butylbenzylphthalate < 50.0 2-Methylnaphthalene < 50.0 50.0 3,3*-Dichlorobenzidine < 50.0 Verschloroxylogentadiene < 50.0 50.0 Benzo[a]anthracene < 50.0	50.0
Hexachlorobutadiene < 50.0 50.0 Butylbenzylphthalate < 50.0 2-Methylnaphthalene < 50.0 50.0 3,3'-Dichlorobenzidine < 50.0 4 50.0 Benzo[a]anthracene < 50.0	50.0
2-Methylnaphthalene < 50.0 50.0 3,3*-Dichlorobenzidine < 50.0 Verephlorocyclopentadiene < 50.0 Benzo[a]anthracene < 50.0	50.0
Weverblowsvelopentsdiene < 50.0 50.0 Benzolajanthracene	50.0
	50.0
2 Chlamanhthalana < 50.0 50.0 Chrysens	50.0
2 Miterestiline < 50.0 50.0 bis(2-Emymexyr)phumane = 50.0	50.0
Sold Sold Di-n-octylphthalate	50.0
< 50.0 50.0 Benzolbinuoranmene	50.0
< 50.0 SO.0 Benzo(Killuoraninene > 50.0	50.0
3 Milmoniline < 50.0 50.0 Benzolalpyrene	50.0
< 50.0 50.0 Indeno[1,2,3-cd]pyrene < 50.0	50.0
< 30.0 Dioenzia, njandinacens	50.0
2,4-Dimitrosolueno < 50.0 50.0 Benzo[g,h,i]perylene < 50.0	50.0

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leffin, Nr.D. Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751



273 Franklin Road Randolph, N.J. 07869 201 361-4252 Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc. 29-75 Riverside Ave. Newark, NJ 07101

Project Name: Self-Monitoring Lab Case Number: 10950 - 1438 NOSD

MDL = METHOD DETECTION I	IMIT			< = LESS THAN THE MD
		ACIDS		
Lab ID : 1438- 001				Date Sampled: 7/7/95
Client ID: 001				Time Sampled: 14:00
Matrix/Units : Aqueous - μg/L				Date Analyzed: 7/18/95
Compound	Result	Q	MDL	i,
Phenol .	< 10.0	i .	10.0	
2-Chlorophenol	< 10.0		10.0	
2-Methylphenol	< 10.0		10.0	
4-Methylphenol	< 10.0		10.0	
2-Nitrophenol	< 10.0		10.0	
2,4-Dimethylphenol	< 10.0		10.0	
Benzoic acid	< 50.0		50.0	
2,4-Dichlorophenol	< 10.0		10.0	
4-Chloro-3-methylphenol	< 10.0		10.0	
2.4.6-Trichlorophenol	< 10.0		10.0	
2.4.5-Trichlorophenol	< 10.0		10.0	
2.4-Dinitrophenol	< 10.0		10.0	
4-Nitrophenol	< 10.0		10.0	
4,6-Dinitro-2-methylphenol	< 10.0		10.0	
Pentachlorophenol	< 10.0		10.0	
		pH/Corrosiv	rity	
Lab ID: 1438- 001		•	-	Date Sampled: 7/7/95
TW II. 1430- OCT				Time Sampled: 14:00

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Result

12.58

MDL

±.02

Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

New Jersey Certified Lab# 14751

Client ID: 001

Compound

pΗ

Matrix/Units: Aqueous - µg/L

New York Certified Lab # 11402

Time Sampled: 14:00

Date Analyzed: 7/13/95

ACCREDITED LABORATORIES, INC. VOLATILE ORGANIC ANALYSIS DATA

nge humber	2713	MATRIX Aqueous	
ALE NUMBER	9507011	DILUTION FACTOR 10	_
TA FILE	>A3114	DATE EXTRACTED	_
ULIEHT NAME	CT1	DATE ANALYZED 06/02/95	_
FIELD ID	RED43	ANALYZED BY LARRY	_

		عددم		非可能出办 有要要		Jananan esa	
COMPOUND	UG/1	-	HOL	CAS #	COMPOUND	UG/L	MOL
		, ,	****			*********	/226m a zz
		1			1,2-Dichloropropane	Ü	4.0
	ι	;	66	10061015	cis-1,3-Dichlaropropene	U	4.0
Chloromethana	ι	l	20	<i>7</i> 9016	Trichlorcethene	· u	4.0
Bromome thane	į	1	20	71432	Benzene	ŭ	4.8
Vinyl Chloride	ι)	20	124481	Dibromochloromethane	it	4.8
Ch loroethane		l	20	<i>7</i> 9005		ıı	4.0
Nethylene Chloride	32	W	10	18061026		"	4.0
Acetone _	U		18	110758		ii ·	20
Carbon Disulfide	U		4.0			11	4.0
Trichlorofluoromethane	U		4.0			11	9.0
1,1-Dichloreethene	U		4.0			ii	7.0
1,1-Dichloroethane	U		4.0			11	4.0
trans-1,2-Dichloroethene	U		4.8			ü	6.0
Chloroform	41	W	4.0	108883		17	5.0
1.2-Dichloroethane	50	ш		· ·		11	
				-		11	4.0 10
1.1.1-Trichlorgethane	U				=		
	Ū.				•	_	4.8
	Ū.				••		28
	_	ш			•	U	21
	Acrolein Acrylenitrile Chloromethane Bromomethane Vinyl Chloride Chloroethane Methylene Chloride Acetone Carbon Disulfide Trichlorofluoromethane 1,1-Dichloroethane trans-1,2-Dichloroethene	Acrolsin Acrylonitrile Chloromethane Bromomethane Uinyl Chloride Chloroethane Kethylene Chloride Acetone Carbon Disulfide Trichlorofluoromethane U,1-Dichloroethane	Acrolain U Acrylonitrile U Chloromethane U Bromomethane U Vinyl Chloride U Chlorosthane U Kethylene Chloride J2 W Acetone U Carbon Disulfide U Trichlorofluoromethane U 1,1-Dichloroethane U 1,1-Dichloroethane U 1,2-Dichloroethane U 1,2-Dichloroethane U 1,2-Dichloroethane U 1,2-Dichloroethane U 1,1-Trichloroethane J4 W 1,2-Dichloroethane J5 W Carbon Tetrachloride U Vinyl Acetate	Acrolsin U 61 Acrylonitrile U 46 Chloromethane U 20 Bromomethane U 20 Vinyl Chloride U 20 Chlorosthane U 20 Kethylene Chloride J2 W 10 Acetone U 18 Carbon Disulfide U 4.8 Trichlorofluoromethane U 4.0 1,1-Dichloroethane U 4.0 1,1-Dichloroethane U 4.0 trans-1,2-Dichloroethane U 4.0 Chloroform 41 W 4.0 1,2-Dichloroethane J 4.0 1,2-Dichloroethane J 4.0 1,2-Dichloroethane J 4.0 1,1,1-Trichloroethane J 4.0 2-Butanone J4 4.0 1,1,1-Trichloroethane U 4.0 Carbon Tetrachloride U 4.0 Vinyl Acetate	Acrolsin U 61 78875 Acrylonitrile U 66 10061015 Chloromethane U 20 79016 Bromomethane U 20 79432 Vinyl Chloride U 20 124481 Chloroethane U 20 79805 Rethylene Chloride 32 W 10 18061026 Acetone U 18 110758 Carbon Disulfide U 4.0 75252 Trichlorofluoromethane U 4.0 591786 1,1-Dichloroethane U 4.0 108101 1,1-Dichloroethane U 4.0 127184 trans-1,2-Dichloroethane U 4.0 108893 1,2-Dichloroethane 50 W 4.0 108997 2-Butanone 54 4.0 100414 1,1,1-Trichloroethane U 4.0 189027 Uinyl Acetate U 4.0 1330207 Vinyl Acetate	Acrolain U 61 78875 1,2-Dichloropropana Acrylonitrile U 64 10061015 cis-1,3-Dichloropropana Chloromethana U 20 79016 Trichloroethana Bromomethana U 20 71432 Benzana Vinyl Chloride U 20 124481 Dibromochloromethana Chloroethana U 20 79005 1,1,2-Trichloropethana Rethylana Chloride J2 W 10 18061026 trans-1,3-Dichloropropana Acrolain U 18 110758 2-Chloroethylvinylethana Acrolain U 4.0 75252 Bromoform Trichlorofluoromethana U 4.0 591786 2-Hexanona 1,1-Dichloroethana U 4.0 109101 4-Mathyl-2-pantanona 1,1-Dichloroethana U 4.0 127184 Tetrachloroethana trans-1,2-Dichloroethana U 4.0 108893 Toluana Chloroform 41 W 4.0 108893 Toluana 1,2-Dichloroethana 50 W 4.0 108907 Chlorobenzana Chloroform 41 W 4.0 108893 Toluana 1,2-Dichloroethana 54 4.0 108414 Ethylbanzana 1,1,1-Trichloroethana U 4.0 109414 Ethylbanzana Chloroform 54 4.0 109425 Styrena Carbon Tetrachlorida U 4.0 1330207 m,p-Xylana Vinyl Acetata	Acrolein U 61 78875 1,2-Dichloropropane U Chloromethane U 20 79016 Trichloroethene U 20 71432 Benzene U 20 124481 Dibromochloromethane U 20 79805 1,1,2-Trichloropropene U 20 79805 1,1,2-Trichloropropene U 20 79805 1,1,2-Trichloropropene U 20 20 20 20 20 20 20 20 20 20 20 20 20

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichlorosthane-d4	101 %	76-114	OK
To i vene-d8	100 ×	88-110	OK.
Brosof Luorobenzene	96 %	86-115	nk

 $[{]f J}$ - Indicates compound concentration found below MDL.

U - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.

W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

ACCREDITED LABORATORIES, INC. BNA ORGANIC ANALYSIS DATA

ASE NUMBER	2713
SAPPLE NUTRER	9507011
DATA FILE	>F1875
CLIENT NAME	CC1
FIELD 10	RED#3

MATRIX	Acueous
DILLITION FACTOR _	5
DATE EXTRACTED	05/24/95
DATE ANALYZED	06/17/95
ANALYZED BY	PALL

CAS \$	COMPOUNO	US/L	HOL	CAS \$	COMPOUND	UG/L	HDL
108952	ezanzasszenteszenzuszententente Phengi		50	59507	4-Chloro-3-methylphenol	V	50
955 <i>7</i> 8	2-Chlorophena i	Ų.	50	98062	2,4,6-Trichlorophenol	U	50
95487	2-Methylphena i	Ü	50	95954	2,4,5-Trichlorophenol	U	250
108394	384-Nethylphenol	¥	50	51285	2,4-Dinitrophenol	U	250
88 <i>7</i> 55	2-Kitrophenol	. 1)	50	100027	4-Nitraphenal	บ	250
105679	2,4-Dimethylphonol	u	50	534521	4,6-Dinitro-2-mathylphenol	U	250
120852	2,4-Dichiarophenal	U	50	87865	Pentach leropheno i	U	250
111444	bis(-2-Chloroethyl)Ether	U	58	121142	2,4-Dinitrotoluene	U	50
541731	1,3-Dichlorobenzene	វេ	50	84662	Diethylphthalate	U	50
106467	1,4-Dichtorobenzene	Ù	50	7005723	4-Chlorophenyl-phenylether	ប	50
190516	Benzyl Alcohol	ប	50	86737	Fluoren e *	ប	50
Y5501	1.2-Dichlorobenzene	Ü	58	190016	4-Nitroaniline	U	250
108601	bis(2-Chlorossopropyl)ether	វេ	50	863 0 6	N-Mitrosodiphenylamine	U ·	50
621647	N-Nitroso-Di-n-propylamine	Ų	50	101553	4-Bromophenyl-phenylether	U	50
67721	Hexachioroethane	ម	50	118741	Hexachiorobenzene	U	50
98953	Ni trobenzene	u	50	95018	Phenanthrene	U	50
78591	Isopharane	U	5 0	120127	Anthracene .	IJ	50
,5850	Benzoic Acid	U	25û	84742	Di-n-Butylphthalate	U	50
111911	bis(-2-Chloroethoxy)Methane	U	50	206440	Fluoranthene	U	50
120821	1,2,4-Trichlorobenzene	u	50	129000	Pyrene	U	50
91203	Nach tha Lene	U	50	856B7	Butylbenzylphthelata	U	50
106479	4-Chloroaniline	U	50	91941	3,3'-Dichlorobenzidine	น	100
87683	Hexach lorobutadiene	ย	50	56553 .	Benzo(a)Anthracena	U	50
91576	2-Nathylnaphthalene	ប	50	117817	Bis(2-Ethylhoxyl)Phthalate	Ü	50
77474	Hexachlorocyclopentadiene	U	50	218019	Chrysene	U	50
Y1587	2-Chioronaphthalene	U	50	11 <i>7</i> 840	Di-n-octyl phthalate	U	58
88744	2-Nitroaniline	180 J	250	205 99 2	Benzo(b)fluoranthene	U	50
131113	Dimethyl Phthalate	ข	50	28 708 9	Benzo(k)Fluoranthene	u	50
218968	Acenaphthylane	ข	50	50328	Benza(a)Pyrens	Ù	50
99 09 2	3-Nitroaniline	U	254	193395	Indens (1,2,3-cd)Pyrene	U	50
83329	Acenaohthens	Ų	5 0	53703	Dibenzo(a,h)Anthracene	ប	50
132649	Dibenzofuran	U	50	191242	Benza(g,h,i)Perylene	ប	50
646202	2.6-Dinitrotaluene	U	50	62 <i>7</i> 59	H-Nitrosodimethylamine	U	50

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
Nitrobenzene-d5	<u>59</u> %	35-114	_OK
2-Fluorabiphenyl	<u>81</u> %	43-116	<u> </u>
Terphenyl-d14	21 %	33-141	<u> 0ut</u>
Pheno I-d5	24 *	18 94	_0K
2-Fluorophenol	127 %	21-190	_0u1_
2,4,6-Tribromophenol	********* 10	T OETECTED *	********
-7.1.			

J - Indicates compound concentration found below HDL.

^{1 -} Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.

[.] W - Result exceeds specific ground water quality criteria.*

^{*} Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

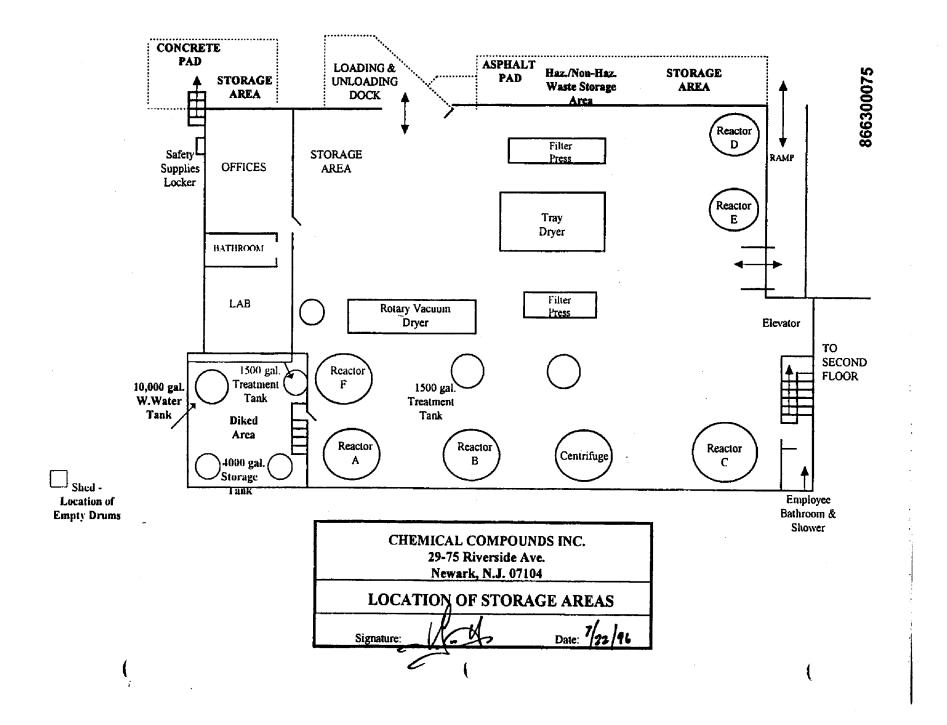
as 3-Hethylphenol and 4-Hethylphenol can not be separated by the method applied

866300073

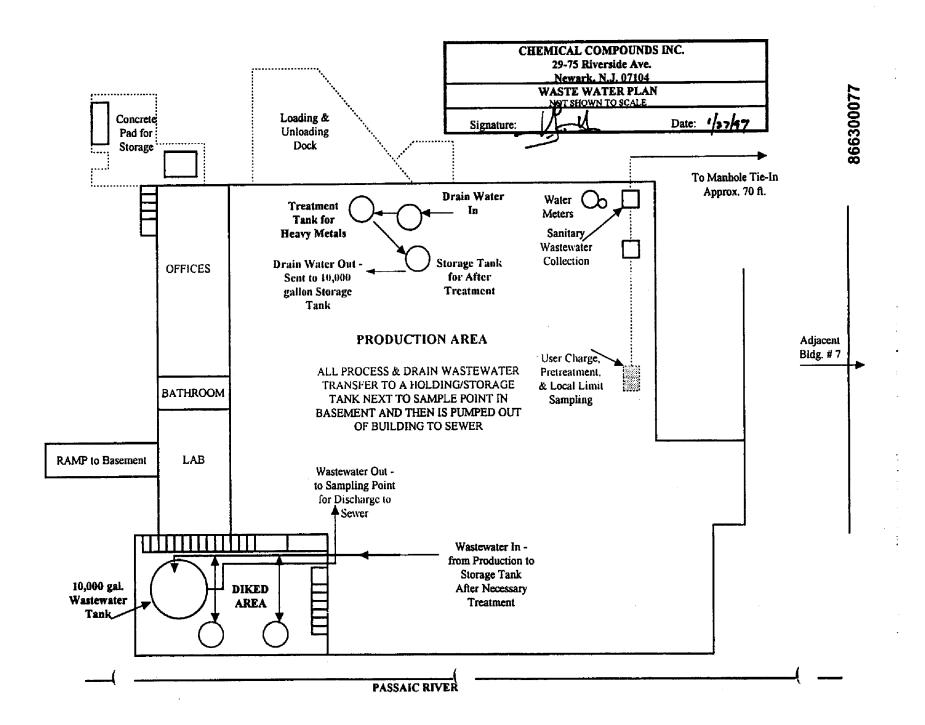
ACCREDITED LABORATORIES, INC. GENERAL CHEMISTRY AWALYSIS DATA

Case #: Sample #: CLient Name: Field Number:	2713 9507011 CCI RED#3			Matrix: Date Receiv	ved:	Agueous 05/19/9	
ANALYTES	RESULTS	MDL	UNITS	DILUTION FACTOR	METHOD (BLANK MDL	ANALYSIS DATE
Cyanide, Total	КО	0.01	ng/L	1.	МО	0.01	05/23/95











Jersey Department of Environmental Protection and Energy Division of Responsible Party Site Remediation Bureau of Emergency Response Region I

INVESTIGATION

aasi #1 92-01-07-1925

File #: 0714 PAC CODE: TFF

Date: 01/07/92 -

Invastigator: Natthew Garamone Christopher Gibbons

Time Arrived: 1115

Time Departed: 1400

Location: Chemical Compounds, Inc. Address: 29-75 Riverside Avenue

Newark, NJ

Enaronsible Party: Chemical Compounds, Inc. Mailing Address: 29-75 Riverside Avenue Newark, NJ

odation Phone #: 201-485-3211

Real of Dept. Rep: Bob Swales - Newark OEM Phone # : 201-733-3664

Drizin of Complaint: Oper, Piccitto - NJSP Phone # : 201-578-8173 Marine Bureau

ture of Complaint: Unknown liquid being discharged from pipe onto cond and into Passaic River at incident location.

lings: BER Region I responded to Newark to investigate the report the MUSP Marine Bureau at Newark Bay of the discharge of an analy, purple liquid from a pipe at the Chemical Compounds facility antering the Passaic River. MPO's Mundorff and Kirschner of the MUSP Marine Bureau at Newark Bay were investigating a complaint of a substantial discharge from Chemical Compounds' facility by and overs at the Napp-Grecco Company adjacent to the incident long tion. Mpols Mundorif and Kirschner reported to Investigators

and Gibbons that they had observed a hose line coming from the chemical Compounds building and discharging an and purple liquid onto the ground adjacent to the Passaic Rivers of the property between the facility and the river revealed stained area with a free-standing puddle of a dark purple stained area with a free-standing puddle of a dark purple stained area. spillage over the bulkhead and into the river at this location. Not have line was present in this area at the time of BER I's inspection, the Moddent location.

the fear of the property, near to the Napp Greco Complete an opening vith an exposed sanitary sewer line. There were free standing the seas of dark purple liquid in this area. According to Chemical expounds owners, Alberto Celleri and Harold Sullivan Thereactifies

FROM Robert C Matule. Esq Z018-198-L

MRR 69 '92 10: 49 TO 2014854876

has been experiencing problems with this sanitary line backing uplands was accempting to unclog it by pumping it out and snaking the line responding to Alberto Celleri, the large stained area of ground with a suidle of dark purple liquid, on the side of the facility next to the result of the floors of the process area being washed down by an employee. This puddle indicated positive by prager to accept acid and had a pH of 1.

lity has been producing red #3 and HC-blue #2 hair dyes. The dark liquid observed on the ground around the outside of the liquid from their processes in a 5,500 gallon capacity tanker in the rear of the facility. Disposal of this material is find the rear of the facility. Disposal of this material is chemical Wasta Management which manifests the wasta as a processes, the facility also disposed of waste methanol in processes, the facility also disposed of waste methanol through the processes, the facility also disposed of waste methanol through the processes. The facility also disposed of waste methanol through the processes. The facility waintains a tanker of methanol on-site with a capacity of 4,000 gallons for their system according to Mr. Celleri. The facility, however, has no need that the facility in their processes into

MPO's Mundorff and Kirschner went to Clara Maas Hospital in Belleville due to chemical exposure at the incident location. In addition, 8 substituted at the Napp-Greco Co. adjacent to the incident location of substituted at the Napp-Greco Co. adjacent to the incident location of substituted at the Napp-Greco Co. adjacent to the incident location of the substituted at the Machine Medical exposure at first Care Medical fice and the Division of Criminal Justice also performed an vestigation of this incident. Threstigators Garamone and Gibbons vestigation of this incident. Threstigators Garamone and Gibbons reconstituted a Nov to Chemical Compounds, Inc. for the discharge and the actill act. The facility contracted ENSI, Inc. of Newark to the actill act. The facility contracted ENSI, Inc. of Newark to samples for analysis of the stained areas of ground and standing liquid. The affected areas were covered with plastic and the need to remove any contaminated soil based on these

iclusions: BER Region I responded to Newark to investigate the by the NJSP Marine Bureau of the illegal dumping of an unknown discharge of an unknown, dark purple liquid containing acetic acid and acetic anhydride occurred onto the ground at the facility. The of Newark was hired by the facility to perform a clean-up. Was issued for this discharge and the incident is under a commission by both the State and the County.

866300080

FROM Robert C Matule, Esq T-861 F. P.

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presentations: This case will be referred to BFO-Metro for follow-up its discharge at the facility and to evaluate the hazardous waste Date

866300081

BISPCSPIES UI TOIS

NEWARK FIRE DEPARTMENT OFFICE OF HAZARDOUS MATERIALS 188 Mulberry Street Newark, New Jersey 07102

STANLEY J. KOSSUP
Director/Fire Chief

(201) 733-7506

Fax (201) 733-7468

Chemical Compounds 29-75 Riverside Avenue Newark, NJ 07104

January 10, 1992

attn: Mr. Harold Sullivan

On January 7, 1992, the Newark Fire Department's Hazardous Materials Unit responded to your facility, Chemical Compounds at, 29 Riverside Avenue. The complaint regarded unidentified liquid flowing from a hose line on the second floor of your building, down a set of exterior stairs, onto the ground and into the Passaic River.

This action is a violation of the City of Newark's Hazardous Materials Regulations. You are in violation of the following:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spilled hazardous materials.

Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

On January 7, 1992, you or one of your employees disconnected a hose line leading into a waste recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected earth, and into the Passaic River.

Section 10.1b It shall be unlawful to use or operate any bulk storage area or part thereof without:

> (b) providing for the segregation of potentially reactive chemicals which materials or which may react so as to form hazardous materials, and which present or cause a hazardous or dangerous condition.

It was noted that oxidizers, (M & T Chromic Acid) are stacked on top of corrosives. (Ethylene Cholorhydrin)

Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

> All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

> A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

An unqualified person disconnected the hose leading to the waste container. If the person was qualified he would have been required to know that the product he was discharging onto the ground was hazardous.

Section 15.1 In the event of fire, explosion, structural failure, leakage or other discharge relating to hazardous materials requiring notifications under Federal or State law, the permit holder shall also notify the Director.

> The permittee shall submit to the Director within ten days a copy of the written report pursuant to the Hazardous Substance Discharges: - Reports and Notices Act, N.J.S.A. 13:1K-15, and regulations promulgated thereunder.

The permittee shall also provide information to the Director relating to the ability of the permittee to contain and dispose of the hazardous material, the estimated time it will take to complete storage and disposal, the degree of hazard created and the quantity and type of material released. The Director may verify that the hazardous material is being contained and appropriately disposed.

The appropriate agencies were not notified when the spill, leak or discharge occurred. A private citizen reported this incident to the State Police.

- Section 17.1c Failure to abate, correct or rectify any noncompliance with the provisions of these Regulations any permit conditions or any provisions of the Hazardous Materials Management Plan with the time specified in the Notice of Noncompliance;
- Section 17.3 If the cause of the noncompliance is not abated, corrected, or rectified within the time specified in the Notice of Noncompliance, a Notice of Violation shall be issued.

The Notice of Violation shall be in writing and shall include a reference to the original Notice of Noncompliance, the unconditional right to a hearing and the remedial action to be undertaken.

Under conditions of imminent hazard the Director may issue a Notice of Violation without issuing a Notice of Noncompliance.

- Section 17.4 A request for a hearing by the permittee shall be given to the Director in writing, setting forth in particular any defense the permittee might have in regard to the alleged violations, and a brief statement of the factual matters in support thereof. The notice of the hearing date shall be given by the Director at least ten (10) days prior to the hearing date.
- Section 18.4 Every Permit holder shall insure that a qualified person shall be in charge at all times and at each and every place where hazardous materials operations are carried out. The qualified person shall remain on the premises as long as the manufacture, use processing, or handling of hazardous materials is being carried out and shall return to the premises when required under emergency circumstances. To be a qualified person, the individual shall be knowledgeable in the chemical and physical processes utilized by the Permit holder.

The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow the holder to pass through any manned emergency barricades and enter the permittee facility in the event of an emergency.

X

The person who placed the hose leading from the building to the ground and into the river did not remain on the premises.

•••

Section 20.2 Whenever in these Regulations any act is prohibited or is made or declared to be unlawful, or whenever in these Regulations the performance of any act is required or the failure to perform any act is made or declared to be unlawful, the commission of any such prohibited act or the failure to perform any such act, shall be punished by a fine or not more than \$1,000.00 per day per violation or by imprisonment for a term of not more than 90 days, or by any combination of such fine and imprisonment. Each day any violation of these Regulations continues shall be considered a separate offense.

You have been found to be in violation of five sections of the City of Newark's Hazardous Materials Regulations.

AA;lm



The first state of the second state of the sec

January 31, 1992

and the state of t

Ensi Inc. 194 Avenue L Newark, NJ 07105

Attn: Fred Virrazzi

Nytest is pleased to submit our Project No. 9218614

Log in No. 10997 on your sample (s) received: 1/09/92

Test sample (s) associated with this project will be retained for a period of thirty (30) days, unless otherwise instructed.

My staff is available to answer any questions concerning our report and we look forward to serving your future analytical needs.

Very truly yours,

Nytest Phvironmental Inc.

Remo Gigante

Exec. VP

RG: . Enc.

SHIPPED VIA: UPS RED

box 1518
60 seaview blvd., port washington, ny 11050 (516) 625-5500 fax (516) 625-1274

nytest environmental...

Sample Identification and Results

Log In No.: 10997

Sample No: 1 Lab Sample 10 No.: 1099701

	Max.	•	
Results	Allowable Laveis		Found
	*********		*********
ри а 20 С	2 - 12.5	•	4.35
Ignitabil <u>i</u> ty, F PM	140	-	> 212
Corrosivity, inches/year	0.250		< 0.01
Reactivity to Cyanide, PPN	-		< 1.0
Reactivity to Sulfide, PPH	-		< 1.0
Total Solids, %	•	•	49.3
Petroleum Hydrocarbons, PPH (Ory Wt.)	•		5350
PCS's ,PPH (Dry ut.)	•		< 2.0

NO = None Detected < = Less than

TECHNION INC. 250 Delawanna Avenue Clifton, New Jersey 07014 201-773-5013 FAX #= 201-773-4788

LAB DEP #: 07190

CLIENT: Chemical Compounds Inc.

CLIENT REF: 22592 MATERIAL: One (1) composite from

eleven (11) drums

DATE: 2-27-92 TECHNION REF: 16031

DATE RECEIVED: 2-25-92

LAB ID: 0122T

ANALYSIS REQ: RCRA Waste characteristics

The above samples were as received on 2-25-92 and analyzed as requested.

ANALYST: Sam Yart, Mara Fishman

CERTIFICATE OF ANALYSIS

TEST RESULTS:

All test results are as attached.

Respectfully submitted,

Laboratory Director

SB/sn 16031

TECHNION INC., 250 Delawanna Avenue Clifton, New Jersey 07014 Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE/TIME: 2-27-92/10:00

SAMPLE DATED: 2-25-92

SAMPLE I.D.: Composite

TEST RESULTS FOR TCLP METALS

METALS -	RESULTS	BLANK	MDL	MAX. ALLOWABLE LIMITS
Arsenic	N.D.	<0.01	0.01	5.0
Barium	N.D	<0.01	0.01	100.0
Cadmium	N.D.	<0.01	0.01	1.0
Chromium	N.D.	<0.01	0.01	5.0
Lead	N.D.	<0.01	0.01	5.0
Mercury -	N.D.	<0.002	0.002	0.2
Selenium	N.D.	<0.01	0.01	1.0
Silver	N.D.	<0.01	0.01	5.0

Test results are in mg/l, unless specified.

N.D.: Not Detected

M.D.L.: Minimum Detection Limit

TECHNION INC., 250 Delawanna Avenue Clifton, New Jersey 07014 Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

PERMITTED AND SOME OF THE PROPERTY OF THE

RUN DATE: 2-27-92

DATE SAMPLED: 2-25-92

SAMPLE I.D.: Composite

HAZARDOUS WASTE CHARACTERISTICS

WASTE CHARACTERISTICS	RESULTS	BLANK	MDL	MAX. ALLOWABLE LIMITS (ppm)
PCB (mg/l) Reactivity for CN-(mg HCN/): Reactivity for S-(mg H2S/l) Total Pet.Hydc.(TPHC)(mg/l) Ignitability (oF) Corrosivity as pH	N.D. 1) N.D. N.D. 3.0 t Ignitable 4.5	N.D. N.D. N.D. N.D. N/A	0.36 5.Q 10.0 0.10 N/A N/A	(mg/kg)5-50 250 500 30000 >140 2 <ph 12.5<="" <="" td=""></ph>

Test results are in mg/l, unless specified.

N/A: Not Applicable N.D.: Not Detected

MDL: Minimum Detection Limit

TECHNION INC., 250 Delawanna Avenue Clifton, New Jersey 07014 Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE: 2-26-92

DATE SAMPLED: 2-25-92

RESULTS FOR PH MEASUREMENTS

SAMPLE	ID	RESULTS	(unit
1. 2 3	-	5.2 5.1 4.9	
4 5 6	•	5.1 4.2 5.8	
7 8 9	· .	4.3 5.7 4.1	
10 11		4.2 4.2	

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GABRIEL M. AMBROSIO, ESQ. 464 Valley Brook Avenue P.O. Box 911 Lyndhurst, New Jersey 07071 (201) 933-8844 Attorneys for Plaintiff

richary A. MARGOLIS P.J. Ch

SUPERIOR COURT OF NEW JERSEY : CHANCERY DIVISION - ESSEX COUNTY

PASSAIC VALLEY SEWERAGE
COMMISSIONERS, a body politic :
and corporate of the state of
New Jersey, :

DOCKET NO: C-338-93

: Civil Action

Plaintiff, : CONSENT ORDER AND FINAL JUDGMENT

CHEMICAL COMPOUNDS, INC.,

Defendant.

v.

This matter having been opened to the Court by Gabriel M. Ambrosio, Esq. (John T. Ambrosio, Esq., appearing) on behalf of the plaintiff, the PASSAIC VALLEY SEWERAGE COMMISSIONERS ("PVSC"), alleging that the defendant, Chemical Compounds, Inc. ("Chemical Compounds"), violated the provisions of N.J.S.A. 58:14-1 et seq. by discharging pollutants in excess of Sewer Connection Permit No. 20407122 ("Permit"), the rules and regulations of the PVSC and the Categorical Pretreatment Regulations promulgated by the United States Environmental Protection Agency ("USEPA") at 40 C.F.R. § 414, and the defendant, without admitting any fact, liability or fault as to any or all of the allegations of the complaint, having consented to the entry of the within Consent Order and Final Judgment, and for good cause thus shown;

IT IS on this day of December 1994; ORDERED that:

Civil Penalties

1. Within 10 days of the date hereof, the defendant, Chemical Compounds, shall pay to the PVSC the sum of six-thousand dollars (\$6,000.00) (the "Settlement Amount") in settlement of all civil penalties that could have been assessed against the defendant for allegedly having violated the provisions of N.J.S.A. 58:14-1 et seq. by discharging pollutants in excess of the Categorical Pretreatment effluent limitations promulgated at 40 C.F.R. S 414 and incorporated by reference in the Permit between July 1, 1991 and the present, including, but not limited to, those alleged violations set forth in the complaint filed by the plaintiff in this action. All settlement payments shall be made payable to the "Passaic Valley Sewerage Commissioners."

Compliance Schedule

- 2. Chemical Compounds shall comply with the following schedule for the purpose of controlling and eliminating discharges in excess of the Lead, Zinc and Cyanide limitations of the § 414 Categorical Pretreatment Regulation and the Permit:
 - (a) Chemical Compounds shall immediately commence and implement a study program for the purpose of identifying possible raw materials and in-plant processes which may be the source of Lead and Zinc entering its wastewater system.

- 2 -

- (b) On or before December 1, 1994, Chemical Compounds shall submit a First Interim Report to the PVSC detailing its compliance with the discharge limitations for Lead, Zinc and Cyanide. If the results of the First Interim Compliance Report indicate that no additional pretreatment control equipment is required, Chemical Compounds shall be in compliance with the limitations for the discharge of Lead and Zinc on or before December 1, If the results of the First Interim Compliance Report indicate that additional pretreatment control equipment is required to achieve compliance with the discharge limitations for Lead, Zinc and Cyanide, Chemical Compounds shall retain the services of a qualified environmental consultant who shall evaluate its existing wastewater pretreatment system and make necessary recommendations for the purposes of controlling and eliminating discharges in excess of the Lead, Zinc and Cyanide discharge limitations of the Permit.
- (c) In no event shall final compliance with the discharge limitations for Lead, Zinc and Cyanide be extended past April 1, 1995.

Progress Reports

3. Chemical Compounds shall submit to the PVSC monthly progress reports concerning its compliance with the requirements and obligations of this Order.

- 3 -

Final Report

4. Within ninety (90) days of completing the corrective action described in paragraph #2, the defendant shall submit to the PVSC a final report concerning its compliance with all applicable pretreatment standards.

Force Majeure

The completion date for the corrective action described in paragraph #2 or for the submission of any report required by this Order, shall be extended for the period of time that the defendant or its agent is prevented by a Force Majeure event from proceeding with the corrective action or submitting the required report. As used in this Order, a Force Majeure event shall mean an event which is beyond the reasonable control of the defendant including, but not limited to, such events as fire, explosion, inclement weather conditions (that create unforeseen delays), labor disputes, inability to obtain or unavoidable delay in the delivery of materials, inability to obtain or unavoidable delay in securing municipal approvals and/or work permits, inability to obtain or unavoidable delay in securing State approvals and/or Treatment Works Approval and unforeseen subsurface conditions. occurrence of a Force Majeure event causes or may cause delay in meeting any completion or submission date set forth above, defendant shall notify the PVSC in writing within ten (10) days of the occurrence of such event, the precise cause of the delay, the measures taken or to be taken by the defendant to prevent or minimize the delay, an estimate of the date by which such measures

- 4 -

will be completed or such report will be submitted, and an estimate of the duration of the delay. The defendant shall promptly implement all reasonable measures to prevent or minimize any such delays, prevent or minimize any adverse impact on the PVSC system as a result of such delays, and to comply with all requirements of this Order as soon as possible;

6. If the PVSC finds that: (a) the defendant has complied with the notice requirements of the preceding paragraph and; (b) the delay or anticipated delay has been or will be caused by a Force Majeure event, the PVSC shall extend the time for performance under this Order no longer than the delay resulting from the Force Majeure event. If the PVSC determines that: (a) the defendant did not comply with the notice requirements of the preceding paragraph or; (b) the event causing the delay does not constitute a Force Majeure event, failure to complete the corrective action under paragraph \$2 or to submit any report required hereunder shall be a violation of the requirements of this Order and subject the defendant to sanctions under the applicable statutes and regulations. The burden of establishing that any delay is caused by a Force Majeure event rests with the defendant;

General Provisions

7. The corrective action undertaken by the defendant pursuant to this Order shall constitute the penalty for any violations of the Categorical Pretreatment effluent limitations promulgated at 40 C.F.R. § 414 during the period covered by the compliance schedule. In the event that the defendant completes all

corrective action on or before the completion dates set forth in the compliance schedule, and as modified by any force Majeure event, any such exceedances experienced during this period shall not be subject to additional penalty.

- 8. The defendant further understands that any exceedance of the effluent limitation for discharges of Lead, Zinc and/or Cyanide experienced after the final completion date set forth in the compliance schedule, shall be subject to further enforcement proceedings and civil penalties.
- 9. Nothing in this Order shall preclude the PVSC from taking enforcement action against the defendant for matters not set forth herein or in the complaint.
- 10. All provisions of the Permit shall remain in full force and effect and are not modified by this Order. The defendant expressly understands that the compliance requirements contained in this Order do not modify any provisions of the Permit or any duties or liabilities of the defendant thereunder.
- 11. This Order shall be binding on the defendant, its assignees and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 12. Defendant shall perform all work conducted pursuant to this Order in accordance with prevailing professional standards.
- 13. This Order shall not relieve the defendant from obtaining and complying with all applicable federal, state and local permits, as well as all applicable statutes and regulations while carrying out the obligations imposed by this Order.

14. The obligations and civil penalties of this Order are imposed pursuant to the police powers of the State for the enforcement of law and the protection of public health, safety, welfare and are not intended to constitute a debt or debts which may be limited or discharged in a bankruptcy proceeding.

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- 15. In addition to the PVSC's statutory and regulatory rights to enter and inspect, the defendant shall allow the PVSC and its authorized representatives access to its facility at all times for the purpose of monitoring defendant's compliance with this Order;
- 16. The defendant shall make available to the PVSC all technical records and contractual documents maintained or created by the defendant or its contractors in connection with this Order.
- 17. The PVSC reserves the right to require the defendant to take additional actions as authorized by law should the PVSC determine that such actions are necessary to protect human health, the environment or the PVSC system. Nothing in this Order shall constitute a waiver of any statutory right of the PVSC to require the defendant to undertake such additional measures should the PVSC determine that such measures are necessary, subject to the defendant's rights under this Order, applicable statutes and regulations.
- 18. The defendant shall not construe any informal advice, guidance, suggestions or comments by the PVSC or by person(s) acting on behalf of the PVSC, as relieving the defendant of its obligation to obtain written approvals as may be required herein, unless such advice, guidance, suggestions or comments by the PVSC

shall be submitted in writing to the defendant.

- 19. The defendant shall give written notice of this Order to any successor in interest prior to transfer of ownership of the facility which is the subject of this Order and shall simultaneously verify to the PVSC that such notice has been given.
- 20. No modification or waiver of this Order shall be valid except by written amendment duly executed by the defendant and the PVSC.
- 21. The Court shall retain jurisdiction over the parties to this action solely for the purpose of enforcing the provisions of this Order.
- 22. The PVSC reserves the right to reopen this case in the event the Commissioners of the PVSC, at their next available public meeting, do not accept the recommendations of the chief counsel to enter into this Consent Order and Final Judgment.
- 23. This Order does not constitute, nor shall it be used as evidence of the findings of any fact or the admission of any facts, fault or liability on the part of the defendant, nor shall any of the alleged violations settled herein be utilized in any way as prior violations for the purposes of characterizing any other violations, alleged or actual, existing or hereinafter committed.

Hon. Harry A. Margolis, P.J.Ch.

... Ω ..

The undersigned hereby consent to the entry of the foregoing order, both as to substance and form.

GABRIEL M. AMBROSIO, ESQ.

Dated: -/2/94

John T. Ambrosio, Esq. Attorneys for the PVSC

CHEMICAL COMPOUNDS, INC.

Dated: 1//29/94

Authorized Signature

ALBERTO CELLERI

Print Name

PRESIDENT

Print Title & Position

JTA:ja Chemical Compounds.con

. 9 -



VIOLATION NOTICE HAZARDOUS MATERIALS REGULATIONS

CITY OF NEWARK.

1010 18th Apr., Newark, N.J. 07108 (201) 733-7495

3 NOTICE OF VIOLATION AN	D ORDER	□ NON C	OMPLIANCE	COURT	LACTION REQUIRED
EIT ENTIFICATIONS					
LOCATION: 29 Riverside /	200000000000000000000000000000000000000		Block:	Lot:	T
CWNER: Name Chemical Compo Address 29-75 Rivers: Town/State/Zip Newark, NJ THAT Permit #:	de Avenue 07104		Address 29-75	Riverside Av	venue 1104
Carrion Table					
DATE OF NOTICE:	COMPLIAN	CE DUE DATE:		DATE OF INSPECTIO	N:
21, 1990) governing hazar		* .			
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Scotion 10.1 B		2			
Section 12.2	*	, · · · · · · · · · · · · · · · · · · ·			
Section 15.1		•			
Section 18.4				•	•
It you have any questions o	oncerning this n	nattor, please	call: <u>(201) 733 - 74</u> 9	95	
Inspector /	Dal	8	Hazmat Officer	i.	Oate
Officer in Charge Fire P	revention & Safe	ity	Received by:		Date.

NEWARK FIRE DEPARTMENT

OFFICE OF HAZARDOUS MATERIALS 138 Mulberry Street Newark, New Jersey 07102

STANLEY J. KOSSUP

(201) 733-7506

Fax (201) 733-7468

Chemical Compounds 29-75 Riverside Avenue Newark, NJ 07104

January 10, 1992

attn: Mr. Harold Sullivan

On January 7, 1992, the Newark Fire Department's Hazardous Materials Unit responded to your facility, Chemical Compounds at, 29 Riverside Avenue. The complaint regarded unidentified liquid flowing from a hose line on the second floor of your building, down a set of exterior scairs, onto the ground and into the Passaic River,

This action is a violation of the City of Newark's Hazardous Materials Regulations. You are in violation of the following:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spilled hazardous materials.

Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

On January 7, 1992, you or one of your employees disconnected a hose line leading into the recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected eat of into the Passaic River.

866300108

078488418C

Section 10.1b It shall be unlawful to use or operate any bulk storage area or part thereof without:

(b) providing for the segregation of potentially reactive chemicals which materials or which may react so as to form hazardous materials, and which present or cause a hazardous or dangerous condition.

It was noted that oxidizers, (M & T Chromic Acid) are stacked on top of corrosives. (Ethylene Cholorhydrin)

Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

An unqualified person disconnected the hose leading to the waste container. If the person was qualified he would have been required to know that the product he was discharging onto the ground was hazardous.

Section 15.1 In the event of fire, explosion, structural failure, leakage or other discharge relating to hazardous materials requiring notifications under Federal or State law, the permit holder shall also notify the Director.

The permittee shall submit to the Director within ten days a copy of the written report pursuant to the Hazardous Substance Discharges: - Reports and Notices Act. N.J.S.A. 13:1K-15, and regulations promulgated thereunder.

The permittee shall also provide information to the Director relating to the ability of the permittee to contain and dispose of the hazardous material, the estimated time it will take to complete storage and disposal, the degree of hazard created and the quantity and type of material released. The Director may verify that the hazardous material is being contained and appropriately disposed.

The appropriate agencies were not notified when the spill, leak or discharge occurred.

- Section 17.1c Failure to abate, correct or rectify any noncompliance with the provisions of these Regulations any permit conditions or any provisions of the Hazardous Materials Management Plan with the time specified in the Notice of Noncompliance;
- Section 17.3 If the cause of the noncompliance is not abated, corrected, or rectified within the time specified in the Notice of Noncompliance, a Notice of Violation shall be issued.

The Notice of Violation shall be in writing and shall include a reference to the original Notice of Noncompliance, the unconditional right to a hearing and the remedial action to be undertaken.

- Under conditions of imminent hazard the Director may issue a Notice of Violation without issuing a Notice of Noncompliance.
- Section 17.4 A request for a hearing by the permittee shall be given to the Director in writing, setting forth in particular any defense the permittee might have in regard to the alleged violations, and a brief statement of the factual matters in support thereof. The notice of the hearing date shall be given by the Director at least ten (10) days prior to the hearing date.
- Section 18.4 Every Permit holder shall insure that a qualified person shall be in charge at all times and at each and every place where hazardous materials operations are carried out. The qualified person shall remain on the premises as long as the manufacture, use processing, or handling of hazardous materials is being carried out and shall return to the premises when required under emergency circumstances. To be a qualified person, the individual shall be knowledgeable in the chemical and physical processes utilized by the Permit holder.

The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow the holder to pass through any manned emergency barricades and enter the permittee facility in the event of an emergency.

The person who placed the hose leading from the building to the ground and into the river did not remain on the premises.

Section 20.2 Whenever in these Regulations any act is prohibited or is made or declared to be unlawful, or whenever in these Regulations the performance of any act is required or the failure to perform any act is made or declared to be unlawful, the commission of any such prohibited act or the failure to perform any such act, shall be punished by a fine or not more than \$1,000.00 per day per violation or by imprisonment for a term of not more than 90 days, or by any combination of such fine and imprisonment. Each day any violation of these Regulations continues shall be considered a separate offense.

You have been found to be in violation of five sections of the City of Newark's Hazardous Materials Regulations.

Battalion Chief A. Apostolico

A:A:Im

NEWARK FIRE DEPARTMENT

Office of Hazardous Materials 188 Mulberry Street Newark, NJ 07102

Stanley J. Kossup Director/Fire Chief

(201) 733-7506

Fax (201) 733-7468

Chemical Compounds, Inc. 29 Riverside Avenue Newark, NJ 07104

January 31, 1992

ann: Mr. Harold Sullivan

On January 31, 1992, a reinspection was conducted at your facility on 29 Riverside Avenue. The purpose of this was to check on the violations issued on January 10, 1992. The conclusions of this reinspection are as follows:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spitled hazardous materials. Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

THIS VIOLATION HAS BEEN ABATED.

All internal drains in the building from the first floor have been re-piped, enabling them to drain into a 1,000 gallon tank located on the ground floor. After the material has been PII tested, it is pumped into a hazardous waste trailer.

Section 10.1b providing for the segregation of potentially reactive chemicals which are hazardous materials or which may react so as to form hazardous materials, and which reaction may present or cause a hazardous or dangerous condition.

THIS VIOLATION HAS BEEN ABATED.

The oxidizers, M & T chromic acid, have been relocated to a different location and are no longer stacked on top of corrosives, ethylene cholorhydrin.

Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

THIS VIOLATION HAS BEEN ABATED.

Mr. Sullivan explained that his employees have been trained on the unloading and transfer of hazardous materials. Mr. Sullivan also stated that in the event of a leak, spill or accident his employees will know what to do. I instructed Mr. Sullivan to send me a letter documenting this, to which he agreed:

Mr. Sullivan was also informed that flammable liquids with a flammable rating of three or more should be stacked no more than two drums high, as we found three drums stacked on top of each other in the front of the building during our reinspection.

Battalion Chief Anthony Apostolico

AA:lm

BUREAU OF EMERGENCY RESPONSE FIELD NOTICE OF VIOLATIONS RESPONSIBLE You are hereby NOTIFIED that during an investigation by DEP on the above date, the following violations of New Jersey Statute and/or Regulation were observed. This violation has been recorded as part of a permanent enforcement history file. In addition, this case is being forwarded to the appropriate Division with a recommendation that formal enforcement action be taken SPILL COMPENSATION AND CONTROL ACT X NJSA 58:10-23.11 POLLUTION AND OBSTRUCTION OF WATER NJSA 23:5-28 HAZARDOUS WASTEREGULATIONS days of receipt of this notice, you shall submit in writing, to the address and investigator indicated investigator 866300114



State of New Jersey Department of Environmental Protection and Energy

Division of Responsible Party Site Remediation

Metro Regional Office 2 Babcock Place West Orange, NJ 07052 Tel. # 609-669-3955 Fax. # 201-669-3993

Scott A. Weiner Commissioner

Karl J. Delaney Director

Chemical Compounds Inc. 29-75 Riverside Avenue Newark, NJ 07104 Attn: Alberto Celleri

26, 1992 February

Dear Mr. Celleri,

The New Jersey Department of Environmental Protection and Energy is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seg. to collect all costs Control Act, N.J.S.A. 58:10-23.11 et seg. to collect all costs associated with a discharge and incurred by the State in the removal of hazardous substances or mitigation of damages. Accordingly, of hazardous substances or mitigation of damages. Accordingly, oversight costs (salary, materials and indirect costs), in the amount of \$708.60 were incurred by the Department when the Bureau of \$708.60 were incurred by the Department when the Bureau of Emergency Response responded to an illegal dumping of acetic E

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge. Your payment of this amount merely been caused by the Bureau's interest in recovering its actual costs of the satisfies the Bureau's interest in recovering its actual costs of the above referenced response action.

You must submit a check to the Department payable to the "Treasurer, State of New Jersey" within 30 days after receipt of this notice. Please send your check and the white copy of attached form DEP-062A to:

New Jersey Department of Environmental Protection & Energy Bureau of Revenue CN 417 Trenton, NJ 08625-0417

You may contact Walter Janicek of the Bureau of Emergency Response at 201-669-3955 if you have any questions or require further information.

Very truly yours,

stanley Delikat

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EP-062A New Jerse 1/91 Check here If Revised Billing (ENFORCEMENT		Euelôà	Document # Date Rec'd	
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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY BUREAU OF EMERGENCY RESPONSE ADMINISTRATIVE COST RECOVERY WORK SHEET

CASE

PROJECT ACTIVITY # TFF

Case Name:	Chemica	al Compound	5	. I.D.N	O. <u>92-01-0</u>	<u>7-1025-3</u>	13
COST CALCUL	T ATION:	\$708.60					
RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	OVERTIME RATE	HOURS	AMOUNT
M. Garamone	1/7/92	52.20	4-0	208.80			
	1/7/92	52.20	3.5	182.70			
M. Garamone	1/9/92	52.20	2.0	104.40		-0-0-0	(Report)
M. Garamone	1/8/92	52.20	1.0	52.20			
M. Garamone	1/9/92	52.20	2.5	130.50			
			Total =	678.60			<u>-</u>
							
					·	-	

Equipment:

4 Drager Air sampling tubes - (Acetic Acid) - 4 x 7.50 ea/ = \$30.00

Subpoena Buces Tetum Superior Court of New Jersey

State of New Jersey	
County of Mercer	÷ ,
Custodian of Records	•
Chemical Compound, Inc.	
29-75 Riverside Avenue	
Newark, NJ	· · · · · · · · · · · · · · · · · · ·
TO: R.J.	Hughes Justice Complex
You are hereby commanded to appear at 25 M	iday muary 24th at 11:30 AM
an the City of Transfer	
to give evidence before the State Grand Jury and yo	
of witness fee and bring with you the following recor	ds:
See Attached Sched	lule "A"
·	
If you fall to appear and produce the said reco and you may be charged with contempt. WITNESS, the Bonorable Samuel D. Lens	
this 13th day of January	<u> </u>
Donald Period	Clerk of the Superior Court
	+0
	Blane
	7. Classen, DAG
	984-4470 1/7/92 and on 1/14/92
Received this subpoens at 122	, , , , , , , , , , , , , , , , , , ,
2129.75 Proviside Mrs Arwards 1 server	d it on the within named Harald Sullwan
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Custodial of Records Chemical Compound, Inc. 29-75 Riverside Avenue Newark, NJ

on the first of th

SCHEDULE A

- 1. In answer to this subpoena, the records shall:
 - a. Be delivered in the same condition and order as they are kept in the ordinary course of business:
 - a complete inventory shall accompany the records as to exactly what records are contained in each carton or envelope; and
 - c. the records shall be delivered in a secured carton or envelope as to protect the records and keep them in properorder.
 - The term "document" shall mean any ORIGINAL WRITING . d. (handwritten, typed or otherwise reproduced) formal or informal, in your possession, custody, or control, regardless of where located and includes, but is not limited to, contracts, agreements, communications, letters, telegrams, regulations, memoranda, surveys, studies, summaries, reports, manifests, brokerage agreements, bills of lading, test analysis results, notices, announcements, transcripts, field notes, weigh tickets, telephone memoranda, purchase orders, instructions, charges, manuals, brochures, photographs, schedules, price lists, messages, records, invoices, tape recordings, notes of interviews or communications, calendar entries, records of meetings, applications, newspaper and advertisements, video tapes, information retrieval systems, and any other method of electronic storage, and material prepared for circulation to any past or present division, affiliate, officer, director, employee or agent. In all cases where originals are not available "documents" also mean copies of original writings and non-identical copies thereof.

Without limitation of the term "control" as used in the preceding sentence, a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another source or public or private entity having actual possession thereof.

2. All documents reflecting the procedures or instructions for operating the centrifuge located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building \$17.

A CARLO CONTRACTOR OF THE CONT

3. All documents reflecting the procedures or instructions for the cleaning and draining of the centrifuge located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building \$17.

<u>and a section of the</u>

- 4. All documents or records reflecting the Chemicals or other substances which were either mixed in, processed by, or used in the centrifuge (located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building \$17) between December 1, 1991 and on or before January 7, 1992. Also included in this demand are documents reflecting the schedule that this unit is cleaned, including the date immediately prior to January 7, 1992.
- 5. All documents reflecting the disposal of waste for the period December 1, 1991 to January 8, 1992.

• : . .

6. All documents pertaining to discharges from Chemical Compound, Inc. or any of it's facilities, into the Passaic Valley Sewerage Authority, including but not limited to analysis, correspondence and operating procedures.



State of New Jersey

DEPARTMENT OF LAW AND PUBLIC SAFETY DIVISION OF CRIMINAL JUSTICE

ROBERT J. DEL TUFO ATTORNEY GENERAL RICHARD J. HUGHES JUSTICE COMPLEX TRENTON, NEW JERSEY 08625-0085 TELEPHONE: 809-864-8500 ROBERT T. WINTER

August 18, 1992

Jonathan H. Roth, Esq. 129 Washington Street P.O. Box 1779 Hoboken, NJ 087030

Dear Mr. Roth:

Enclosed please find copies of the draft Waiver of Indictment and Trial by Jury and Accusation prepared in accordance with your July 13, 1992 letter. Advise me if you have any changes and I will then file them and obtain a date with the Court for the plea.

The terms of the plea, pursuant to our recent discussions, are that Chemical Compounds, Inc. plead guilty to a fourth degree water pollution violation, N.J.S.A. 58:10A-10f(3), as contained in the enclosed. The State will accept a fine of \$5,000 for the offense and Chemical Compounds, Inc. will provide a check in the amount of \$1,760.85 payable to the Office of the State Environmental Prosecutor to be used to purchase a one page advertisement in the Gloucester Times conveying a positive environmental message. The defendant will not be identified in the advertisement.

As soon as I determine from you that this is satisfactory, I will schedule a date with the Court.

Very truly yours,

James W. Glassen

JWG/dk Enclosure

866300121

Care Alice (School) Care Alice (March 1988)

SUPERIOR COURT OF NEW JERSEY COUNTY OF ESSEX LAW DIVISION - CRIMINAL

v.)	WAIVER OF INDICTMENT AND TRIAL BY JURY
CHEMICAL COMPOUNDS, INC.)	
CHEMICAL COMPOUNDS,	INC., the above named defendant,
charged with unlawful discharg	e of a pollutant, contrary to
N.J.S.A. 58:10A-10f(3) and N.J	.S.A. 58:10A-6a, being advised
through its agents of the natu	re of the charges against them
and of their right to indictment	nt and trial by jury, hereby
waives prosecution by indictmen	nt and trial by jury and request:
to be tried by the Court.	-
Dated in Newark, New	Jersey, this day of
, 1992.	-
Signed and delivered in the presence of	CHEMICAL COMPOUNDS, INC.
· ·	By:
Reported By: James W. Glassen	Approved and accepted on this day of , 1992, in the presence of the defendants and in open court.
Deputy Attorney General	
	The Honorable Judge of the Superior Court
•	866300122

STATE OF NEW JERSEY

SUPERIOR COURT OF NEW JERSEY COUNTY OF ESSEX LAW DIVISION - CRIMINAL

STATE OF NEW JERSEY)

ACCUSATION

CHEMICAL COMPOUNDS, INC.)

cath with violating the Water Pollution Control Act and having in writing waived indictment and trial by jury and having requested that the Defendant be tried by Accusation by the Court, and the request having been granted;

DEPUTY ATTORNEY GENERAL JAMES W. GLASSEN, for the State of New Jersey, alleges that

COUNT ONE

(Unlawful Discharge of a Pollutant - Fourth Degree)
CHEMICAL COMPOUNDS, INC.

on or about January 7, 1992, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did negligently discharge a pollutant into a municipal treatment works, namely the Passaic Valley Sewerage Commission sewer system in the area of 29-75 Riverside Avenue, Newark, without possessing a valid industrial pretreatment permit issued by the Passaic Valley Sewerage Commission, that is, CHEMICAL COMPOUNDS, INC. did negligently release, spill, leak, pump, pour, emit, empty or dump into the Passaic Valley Sewerage Commission sewer system, which leads to the Passaic

Valley Sewerage Commission sewage treatment works, which then flows into waters of the State, a pollutant, namely industrial wastes, without possessing an industrial pretreatment program permit issued to CHEMICAL COMPOUNDS, INC. by the Passaic Valley Sewerage Commission, contrary to the provisions of N.J.S.A. 58:10A-10f, N.J.S.A. 58:10A-6a, and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

ROBERT J. DEL TUFO
ATTORNEY GENERAL OF NEW JERSEY

By: James W. Glassen Deputy Attorney General

- 2 -

LAW OFFICES

JONATHAN H. ROTH
129 Washington Street
P.O. Box 1779
Hoboken, New Jersey 07030

JONATHAN H. ROTH
Admitted in NJ, NY, MA

(201) 792-0870 Fax: (201) 659-1088 Of Counsel
MARISA Y. PARADISO
Admitted in NJ, NY, CO

August 28, 1992

Mr. Harold E. Sullivan, President Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, New Jersey 07104

Mr. Alberto Celleri Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, New Jersey 07102

Damon R. Sedita, Esq. Schwartz, Tobia & Stanziale 22 Crestmont Road Montclair, New Jersey 07042

RE: State of New Jersey v. Chemical Compounds, Inc./Draft
Waiver of Indictment and Trial by Jury and
Accusation

Gentlemen:

I enclose herewith correspondence from James W. Glassen, D.A.G. in addition to Draft Waiver of Indictment and Trial by Jury and Accusation. Kindly review the same and provide me with the benefit of your comments and/or questions as soon as possible. The terms of the plea are set forth in Mr. Glassen's letter and are as follows:

- Chemical Compounds, Inc. will plead guilty to a 4th Degree water pollution violation under N.J.S.A. 58:10A-10f(3) as contained in the enclosed;
- Chemical Compounds, Inc. will pay a \$5,000 fine and \$1,760.85 for an environmental advertisement in the Gloucester Times.

THE LAW OFFICES OF JONATHAN H. ROTH

Mr. Harold E. Sullivan, President Mr. Alberto Celleri Damon R. Sedita, Esq. August 28, 1992 Page 2

I look forward to hearing from you.

Very truly yours,

Jonathan H. Roth

JHR:slk Encs.

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DEPART	TIMENT OF LAW AND P	UBLIC SAFETY	
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State of New Jersey		MMONS	
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State of New Jersey Department of Environmental Protection and Energy Division of Responsible Party Site Remediation

CN 028 Trenton, NJ 08625-0028

Jeanne M. Fox Acting Commissioner Karl J. Delaney Director

November 30, 1993

Chemical Compounds Inc. 29-75 Riverside Avenue 07102 Newark, NJ

Attn: Alberto Celleri

Dear Mr. Celleri,

The New Jersey Department of Environmental Protection and Energy is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seg. to collect all costs associated with a discharge and incurred by the State in the removal of hazardous substances or mitigation of damages. Accordingly, of hazardous substances or mitigation of damages. Accordingly, oversight costs (salary, materials and indirect costs), in the amount of \$866.47 were incurred by the Department when the Bureau of \$866.47 were incurred by the Department when the Bureau of Emergency Response responded to a chemical fire at Chemical Compounds [Inc. on 10/5/93 in Newark, Essex County. DEPE case # 93-10-05-0736 & 93-10-05-1110.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge. Your payment of this amount merely satisfies the Bureau's interest in recovering its actual costs of the above referenced response action. above referenced response action.

You must submit a check to the Department payable to the "Treasurer, State of New Jersey" within 30 days after receipt of this notice. Please send your check and the white copy of attached form DEP-062A to:

New Jersey Department of Environmental Protection & Energy Bureau of Revenue CN 417 Trenton, NJ 08625-0417

You may contact Walter Janicek of the Bureau of Emergency Response at 201-669-3955 if you have any questions or require further information.

Sincerely,

Stanley Delikat, Chief Bureau of Emergency Response

866300129

New jersey is an Equal Opportunity Employer Recycled Paper

· ·	New Jer	sey Department of En	vironmen	tal Protection and	Energy	Date Rec'd
DEPE-062A Check here if Ro		ENFORCEM	NT IN	VOICE		Amount
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		20, 1003	<u>'</u> }		AMOUNT DUE:	\$866.47
DATE DUE: Make check payable to		30, 1993 ate of New Jersey	,	Mail to: NJDEPE CN 417,	Trenton, N.J. 08	625-0417
COPY DISTRIBU			low - Com	ouny Pink - Bure	au of Reventile Go	oldenrod - Division

to Jonathan Roth

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY BUREAU OF EMERGENCY RESPONSE ADMINISTRATIVE COST RECOVERY WORK SHEET

PAC # V35R

CASE NAME: Chemical Compounds

CASE # 93-10-05-0736

COST CALCULATION: \$866-47

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	O.T.	HOURS	AMOUNT
B. Doyle	r9/5/93	64.43	3.0'	193.29	104.03	0.5	52.01
J. Hoyle	10/5/93	60.66	3.0 ,	181.98	97.95	0.5	48.97
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Reg. Total = 375.27 O.T. Total = 100.98

REPORT:

B. Doyle > 10/5/93 64.43 257.72

Report Total = 257.72

EQUIPMENT:

Amount . Item: HazCat 75.00 50.00 7.50 OVA Drager Tubes

Equipment Total = 132.50

TOTAL AMOUNT DUE = \$866.47

FWE-00

Z

New Jersey Department of Environmental Protection and Energy Division of Facility Wide Enforcement: Metro Bureau of Water & Hazardous Waste Enforcement 2 Babcock Place, West Orange; N.J. 07052. (201) 669-3900



NOTICE OF VIOLATION

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ID NO. ND 108661737 DATE SEP. 14. 94
ENAME OF FACILITY CHEMICAL COMPOUNTS, Inc
LOCATION OF FACILITY 29-75 RIVERSIDE AT. NEWARK N. 207104
NAME OF OPERATOR ALBERTO CELLERI - PRESIDENT
and the second s
You are hereby NOTIFIED that during my inspection of your facility on the above date, the following
alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations
(N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded
as part of the permanent enforcement history of your facility.
1 2 (12)
DESCRIPTION OF VIOLATION 1 ACT: 26-9-3(a) 3- nc
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- 1. - 1(g)
Remedial action to correct these violations must be initiated immediately and be completed by
Oct. 14.94
shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures
you have taken to attain compliance. The issuance of this document serves as notice to you that a violation
has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further
administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations
of these regulations are punishable by penalties of up to \$50,000 per violation.
Out all additional to the second seco
1/9/11/11 21 hocher
Facility Receipt of Copy Opty Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

FWE-009.7

New Jersey Department of Environmental Protection and Energy Division of Facility Wide Enforcement Metro Bureau of Water & Hazardous Waste Enforcement 2 Babcock Place, West Orange, N.J. 07052. (201) 669-3900



NOTICE OF VIOLATION

ID NO. P 108661-737 NAME OF FACILITY CHEMICAL CON	DATE SEO. 14 9 4
NAME OF FACILITY CHEMICAL COL	MPOUNDS, Inc
LOCATION OF FACILITY 29-75 RIJERS	SIDE AV. NEWARK N) 07/04
NAME OF OPERATOR ALBERTO CEL	1-521 - PRESIDENT
NAME OF OPERATOR TO SERVE OF LEADER	
You are hereby NOTIFIED that during my inspection	of your facility on the above date, the following
alleged violation(s) of the Solid Waste Management	Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations
(N.J.A.C. 7:26-1 et seq.) promulgated thereunder we	re observed. These violation(s) have been recorded
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	n (15) days of receipt of this Notice of Violation, you
- bell submit in writing to the investigator issuing this	notice at the above address, the corrective measures
you have taken to attain compliance. The issuance of	f this document serves as notice to you that a violation
has occurred and does not preclude the State of New	v Jersey, or any of its agencies from initiating further
administrative or legal action, or from assessing pena	alties, with respect to this or other violations. Violations
of these regulations are punishable by penalties of up	p to \$50,000 per violation.
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Facility Receipt of Copy Only	Investigator, Division of Facility Wide Enforcement
	Department of Environmental Protection & Energy
	866300133



State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section

866300135

CN 0	Manifest Section 28, Trenton; NJ 08625 Ich) lypewriter.)		Form Арр	roved. OMB	No. 2050-0039. Expires 8-
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Generator's Name and Mailing Address CHENICAL COMPOUNDS - 2175	RIVERSIDE !	IVE,	A. State M	JA	0765131
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5. Transporter 1 Company Name	USEPAID Numb Mブウムラザル4	a lieif			
7. Transporter 2 Company Name 8	US EPA ID Numb		D. Transpo	rter's Phone	CEANER AND
Designated Facility Name and Site Address	C. US EPA ID Numbe	111			
9. Designated Facility Name and Site Address ECOF10 — 2750 PAHARTAL T			F. Transpor	ter's Phone	(-)
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18. GENERATOR'S CERTIFICATION: I hereby declare that the content proper shipping name and are classified, packed, marked, and lab	nts of this consignment are ful	ly and accura	rely describ	ed above by	
according to applicable international and national government reg	jui stions. Isca to reduce the volume and to	nxicity of war	to conscited	to the deare	, a l nava datas mia adta ta
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Printed/Typed Name	Signature	·			Month Day Yes
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SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

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FROM CHEM WASTE NJ TO 9-49546

State of New Jersey

Department of Environmental Protection

Division of Hazardous Waste Management

Manifest Section

CN 023, Tranton, NJ 98625

use type or print in block letters. (Form designed t						va. 2000-2009. Exp	
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generatore US EPA IC		Manifest Decument No 1 alchal 1	of of	J la not	tion in the shadi required by	Feder
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15. Special Handling Instructions and Addition	al Information	1	* ;				
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18. GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, p	declare that the contents of	this consignment	t are fully and ac	curately	described above b	y ohway	٠. ٠.
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SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

7.	AUG-07-1996	15:41 FROM	CHEM WASTE NJ	of New Jersey			EV LT	1
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$\ \cdot\ $	18. GENERATOR'S CI	RTIFICATION: I heref	y declare that the contents packed, marked, and labels	of this consignment at d. and are in all respec	re tuity and accurately as in proper condition	described above to for transport by hi	ghway	-
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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 628, Trenton, NJ 08625 se on elite (12-pitch) typewriter.)

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Managament

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Manifest Section CN 028, Trenton, NJ 08625 elite (12-pitch) typewriter.) UNIFORM HAZARDOUS WASTE MANIFEST and Mailing Address

ALLER SIDE AND MENTS OF Generator's Name and Mailing Address jns N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7 j 72 (Night) Generator's Phone (30/1) DIC17 19 21021 Designated Facility Name and Sita Address En - white clay a rice G Shiff Facility & DE ふじずまた 光/年 M 7/D/0/2/7/2/16/79/0 HERSING PRIME 123 200/42 HERSING W.T. 07195 -13: --Total 12. Container 11. US DOT Description (Including Proper Shipping Name, Hezard Class, and ID Number) No. Туре فيتمرؤ بلد ترعق b. A T d. in case of an emergency or spill immediately call the state the energency occurred in Additional Descriptions for Materials Listed Above Special Handling Instructions and Additional Information IFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highly 16. GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, pa e volume and toxicity of weste generated to the degree i have determined to be , storage, or disposal currently available to me which minimizes the present and itor, I have made a good faith effort to minimize my weste generation and select nomically practicable and that I have selected the practicable method of treatment, are threat to human health and the environment; QR, if I am a small quantity general best waste management method that is available to me and that I can afford, Month Day 021101: HART 17. Transporter 1 Acknowledgement of Receipt of Materials Day . Month 1021/101913 18. Transporter 2 Acknowledgement of R Month Day Yes Signature Printed/Typed Name 19. Discrepancy Indication Space st except as noted in litera 20.; Factility Owner or Ope Printed/Type SIGNATURE AND INFORMATION MUST BE DEGIBLE ON ALL COPIES EPA Form 8700-27 (Rev. 9/85) Previous



State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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State of New Jersey

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Division of Hazardous Waste Management

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State of New Jersey

Department of Environmental Protection
Division of Hazardous Waste Management

Manifest Section, N. 19

CN 028 Trenton, NJ 0862517



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State of New Jersey

Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management AN 128 Trenton, NJ 08625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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3 — TSD MAIL TO - GENERATOR

State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 202 Transon, NJ 08625

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625

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3. Gener	stor's Name and Marting Address	LT 07104	E.	NJA	379023
4 Gener	EMICAL COMPOUNDS AVE., BLDG.17, Newark, B -75 RIVERSIDE AVE., BLDG.17, Newark, B ators Phone (201) A85-3312 6. USEPA			BANET	
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A GENERATOR COPY

State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028, Trenton, NJ 08625 use on ellis (12-pitch) typewriter.)

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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section CN 028. Trenton, NJ 08625

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3 - TSD MAIL TO - GENERATOR

State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section

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CN 028, Trenton, NJ 08625 Form Approved. OMB No. 2050-0039. Expires 9-30-Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.) 1. Generator's US EPA ID No. Manifest UNIFORM HAZARDOUS WASTE MANIFEST Document No. TINIT I MALE SITH 131 State Manifest Document Number Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG.17, NEWARK, HJ07104 the M.J. Dept. of Environmental Protection. (608) 292-5560 (Day) (408) 292-7172 (US EPA ID Number TE DIBI 9 9 2 0 2 6 8 US EPA (D Number ransporter 2 Company Name US EPA ID Number Designated Facility Name and Site Accress NEW JESSEY, Inc. CHEMICAL WASTE MANAGEMENT OF G. Stata Facility's ID 100 LISTER AVENUS MEWARK, NEW JERSEY 07105 [월] 기의 여용(9) 2[1] 6] 기 9[0 H. Facility's Phone 12. Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Quantity No. NON-HAZARDOUS DYE WASH NATER 915101010 NOT REGULATED BY ٥. C. CONTAINS WATER Additional Descriptions for Materials 108 AMMONIUM ACETATE AMMORIUM SULPATE 114 143 d10% 15. Special Handling Instructions and Additional Information call the state the 371 WORK ORDER NO.: PROFILE NO.: DECAL NO.: 16. GENERATOR'S CERTIFICATION: ! hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree i have determined to be economically practicable and that I have selected the oracicable enthod of treatment, storage, or disposal currently available to me which minimizes the present and economically practicable and that I have selected the oracicable and selection and selection and the environment, OR, if I am a small quantity generator. I have made a good faith effort to minimize my waste generation and selection span Day Year Signature : Printed Typec Name 1251 751 92 BARCLD E Transporter 1 Acknowledgement of Receipt of Materials Signature, Month Cay 1041 105018191<u>:</u> 70 18. Transporter 2 Acknowledgement of Receipt of Materials Month Day Year Signature Printed/Typed Name £ 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as Month Day Signature Printed/Typed Name

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

TIERRA-B-004756

3 - TSD MAILTO - GENERATOR

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section

	WASTE MANIFEST Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, N.	50710 4	B. State Gerurator's II	1878948
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9.	Designated Facility Name and Site Address CHRMICAL WASTE HANAGEMENT OF NEW JERSEY, 100 LISTER AVENUE HEWAPK, NEW JERSEY 07105 9 JD 0 8 921	- · · · · ·	F. Transporter's Phone G. State Facility's IO H. Facility's Phone (
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State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management Manifest Section ON Testing N.1 08625

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	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of classified, packed, marked, and labeled, and are in all respects in processing the contents of classified.	f this consignment are fully	and accurate	ely described	above by proper	shipping name and a	71.6
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State of New Jersey
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Manifest Section
CN 421, Trenton, NJ 08625-0421

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STATE OF ARKANSAS Department of Pollution Control and Ecology P. O. Box 8913 Little Rock, Arkansas 72219-8913

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16. GENERATOR'S CERTIFICATION: I hereby declare that the ciclassified, packed, marked, and labeled, and are in all rest government regulations and Arkansas state regulations. If I am a large quantity generator, i certify that I have a progra economically practicable and that I have selected the practic future threat to human health and the environment, OR, If I and the best waste human generit method that is available to me and printed/Typed Name.	in place to reduce the volumn and able method of treatment, storage, on a small quantity generator, I have not treat I can afford. Signature Sign	d toxicity of wir disposal curi	eate generate ently available uith effort to m	d to the degre	e I have determined to be
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State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
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State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
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State of New Jersey Department of Environmental Protection and Energy Hazardous Waste Regulation Program Manifest Section CN 028, Trenton, NJ 08625-0028

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OCCUPATIONAL HEALTH SURVEY REPORT

PREPARED FOR:

Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, NJ 07100

CONDUCTED BY:

Joseph N. Capuzzi
Occupational Health Specialist
CIGNA Loss Control Services

ACCOMPANIED BY:

Mr. Arturo Celleri Safety Manager

DATE OF SURVEY:

October 3, 1995

866300169

PLEASE READ CAREFULLY

This company has undertaken a survey of your premises, equipment, or operations (whichever is pertinent to the type of instructe applied for or provided) for the purpose of supporting the function of risk underwriting. Any recommendation or information provided is not intended as a substitute for advice from a safety appear or legal country you may retain for your own purposes. It is not intended to supplient any legal duty you may have to provide a safe country undertaken product or ensembles.

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INTRODUCTION

On October 3, 1995 an Occupational Health Survey was conducted at the given location to evaluate employee exposure to various airborne contaminates. An executive summary and results of the survey follow.

The data presented in this report reflect conditions as they existed on the day of the survey on which the air sampling was performed. Information, as supplied by plant contacts was relied upon to help in developing conclusions and in the evaluation of programs discussed in this report.

STANDARDS AND GUIDELINES

Standards/Exposure Limits for employee exposure to various materials evaluated during this survey are discussed under the Results heading, and also found in the Data Tables of this report (See Appendix I, Table I). Information on the sources and types of standards and guidelines are listed in Appendix II. Generally employee exposure results are compared to current Occupational Safety and Health Administration (OSHA) regulations/standards, called Permissible Exposure Limits (PEL), and can be found at 29 CFR 1910.1000, which are often called the Z tables. Where other accepted State-of-the-Art industrial hygiene practices or guidelines, such as the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV) are lower or differ in their approach the most current values for these guidelines have been used and noted. The use of these standards and guidelines are thought to give reasonable protection to the health and well being of employees exposed to these materials. Please see the Appendix section of this report for the results.

The ACGIH TLV's are included in this report as exposure standards because for many substances the ACGIH TLV's are more conservative than OSHA standards. The ACGIH TLV's are more conservative because they are based primarily on the prevention of disease. In contrast, OSHA Permissible Exposure Levels (PEL's) are required to take into account the economic feasibility of reducing exposures in affected industries, public notice and comment, and judicial review. The TLV's are guidelines that refer to the airborne concentration to which it is believed that nearly all workers may be repeatedly exposed, day after day, without adverse effect.

EXECUTIVE SUMMARY

Air sampling for ethylene oxide, xylene, nitric acid and methanol reveled that on the day of the survey, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminates.

Recommendations for the implementation of your respiratory protection and confined space programs and for the installation of an emergency eyewash/shower are being resubmitted. New recommendations for improved housekeeping and the use of eye protection are included with this report.

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PLEASE READ CAREFULLY

This company has undertaken a survey of your premises, equipment, or operations (whichever is portional to the type of incurance applied for or provided) for the purpose of supporting the function of risk underwriting. Any recommendation or information provided is not intended as a substitute for advice from a sufery apport or legal counsel you may retain for your own purposes. It is not intended to supplant any legal duty you may have to provide a note accomment of the provider of the provider and the provider and the provider and the provider and the provider and the provider as not intended to supplant any legal duty you may have to provide a note that intended to supplant any legal duty you may have to provide a note intended to supplant any legal duty you may have to provide a note in the provider and the

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METHODS

Air Sampling

Unless otherwise stated, samples were taken in the employees breathing zone to obtain samples indicative of the actual employee exposures. Gilian 513 and 113 air pumps provided the vacuum source. Pumps were calibrated prior to and after the samples collection and were checked for proper operation and flow were necessary and possible. No changes in flow rate were measured, unless noted in the comments section of the results section.

Air samples collected were analyzed by Environmental Health Laboratory in Macon, Georgia and Cromwell, CT which are accredited by the American Industrial Hygiene Association.

RESULTS

Air Contaminants

Table I presents the results of air sampling and analysis. Exposure concentrations are presented in milligrams per cubic meter (mg/M³) or parts per million in air (ppm) by employee and location. Also presented, are the applicable Threshold Limit Value (TLV) or the OSHA Permissible Exposure Levels (PELs).

DISCUSSION

Air Sampling

Chemical Compounds, Inc. is a manufacturer of dye intermediates for hair dyes. Various chemicals are reacted in 6 reactor vessels within the plant. Many different reactions take place, however, of major concern from an industrial hygiene standpoint is the reaction involving ethylene oxide. It is one of the more frequent reactions. Ethylene oxide (ETO) is a highly reactive gas or liquid that can affect the skin, eyes, lungs, and nerves. Ethylene oxide has been found to cause mutations and cancers in animals. Based on these reports and human epidemiological studies showing a higher than expected rate of several cancers, ethylene oxide is considered a suspected human carcinogen.

Nitrogen is introduced into the reactor vessel. The pressure in the vessel is then checked to assure the vessel is holding pressure and there are no leaks. ETO is then piped into the vessel from outside of the building. The ethylene oxide is reacted with 4-fluoro-3-nitroanaline (NFA) under pressure with potassium fluoride added as a catalyst to yield the dye intermediates, NHNFA.

Personal and area sampling for ethylene oxide indicated that employees are exposed to levels below both the OSHA Action Level of 0.5 ppm and the OSHA Permissible Exposure Level of 1 ppm as an 8 hour TWA.

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PLEASE READ CAREFULLY

This company has undertaken a survey of your pression, equipment, or operations (whichever is portinent to the type of insurance applied for or provided) for the purpose of supporting the function of risk underwriting. Any recommendation or information provided is not intended as a substitute for advice from a substitute for advice from a substitute for advice from a substitute for your own purposes. It is not intended to supplied any legal duty you may have to provide a sufe promise, averagines, product or operation.

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nical Compounds, Inc. November 9, 1995 Page 6

TABLE I

Sample	Location	Sample Period	Air Contaminant	Concentration	Units	Standard/ Guideline
QK#1	Carlos Molina/ Operator	10;24-2:51	ethylene oxide	< 0.21	ppm	l
QK#2	Area Sample/ at reactor	10:26-3:02	ethylene oxide	< 0.2	ppm	1
X#1	Petro Naranjo/ asst. operator	1:59-3:02	xylene	< 0.34	ppm	100
X#2	Petro Naranjo/ asst. operator	1;59-3;02	xylene	< 0.34	ppm	100
NA#1	Carlos Molina/ Operator	11:36-2:52	nitric acid	< 0.053	ppm	2
NA#2	Carlos Molina/ Operator	11:36-2:52	nitric acid	< 0.05	ppm	2
M#1	Petro Naranjo/ asst. operator	11:45-12:14	methanol	< 48	ppm	200

ti, dileggaritti. Milge tilggetgraftirtar storallerer til sette herte til saltest er tillta i kallinde som sal

APPENDIX II

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PLEASE READ CAREFULLY

This company has undertaken a survey of your pressions, equipment, or operations (whichever is pertinent to the type of immunes applied for or provided) for the purpose of supporting the function of risk underwriting. Any recommendation or information provided is not intended as a substitute for advice from a safety expect or legal cosmicity you may retain for your own purposes. It is not intended to supplient any legal duty you may have to provide a safe recoming workpaper, are about a commentation.

Standards and Guidelines

A listing of the appropriate health standards can be found in the following table. Included in this table are the following:

- Permissible Exposure Limits (Title 29 Code of Federal Regulations (CFR) Part 1910.1000). The PEL's represent the legal exposure limits set by the Federal (or State) Department of Labor/OSHA.
- The 1995 1996 Threshold Limit Values which are guidelines developed by American Conference of Governmental Industrial Hygienists (ACGIH) to protect the health and well being of workers.

For a complete listing and explanation of the use of the PEL's and TLV's, please consult the above documents/sources.

	OSHA	Permissible Level (PEI	•	ACĠII	Limit Value		
Substance	Units	8-Hr.³	STEL4	Ceiling	8-Hr.³	STEL ⁴	Ceiling ⁵
ethylene oxide ⁶	ppm	1		•	1,A2	_	-
methanol (skin)	bbar	200	-		200	250	-
nitric scid	bbur	2	-	•	2	4	-
xylene	ppm	100		-	100	150	•

1.	PEL	Permissible Exposure Limits, Title 29 Code of Federal Regulation Part 1910.100, Occupational Safety and
		Hoelth Administration
2	TLV	Threshold Limit Value published by the American Conference of Governmental Industrial Hygienists (1994-
		1995).
3.	8-Hour/10-Hour	The time-weighted average for an 8 or 10 hour work shift in a 40 hour work week.
4.	STEL	Short term exposure limit (15 minutes).
5.	Ceiling (C)	Ceiling limit, the concentration that should not be exceeded during any part of the working exposure.
6.	ETO	PEL found in the comprehensive OSHA Standard for Ethylene Oxide (29 CFR 1910.1047).
		Acrica level 0.5 mm

*****	Al	Confirmed Human Carcinogen:
	W.	
******	A2	Suspected Human Carcinogen;
*****	A3	Animal Carcinogon,
*****	Δ4	Not Classifiable as a Human Carcinogen
*****	A5	Not Suspected as a Human Carcinogen.
*****	NIC	notice of intended change.

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PLEASE READ CAREFULLY

This company has undertaken a survey of your premises, equipment, or operations (whichever is portionst to the type of inserance applied for or provided) he the purpose of supporting the function of risk underwiting. Any recommendation or information provided is not intended as a substitute for advice from a nafety expert or logal counsel you may retain for your own purposes. It is not intended to supplent any legal duty you may have to provide a safe prunises, workplace, product or operation.

APPENDIX III

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PLEASE READ CAREFULLY

This company has undertains a survey of your pression, equipment, or operations (whichever is pertinent to the type of insurance applied for or provided for the purpose of supporting the function of risk underwriting. Any recommendation or information provided is not intended as a substitute for advice from a safety expect or legal counsed you may retain for your even purposes. It is not intended to supplant any inguidant you may have to provide a safe annualization product or constitute.

METHODS TABLE

Analyte	Flow Rate (liters per minute)	Collection Media	Analysis	Analytical Method
ethylene oxide	0.1	Qazi Ketcham tube	Solvents by Gas Chromatography	FID;NIOSH 1501, S286 modified
methanol	0.178	silica gel tube	Solvents by Gas Chromatography	FID;NIOSH 2000
nitric scid	0.2	Orbo 53 tube	Anions by Ion Chromatography	Conductivity; NIOSH 7903
xylene	0.2	charcoal tube	Solvents by Gas Chromatography	FID;NIOSH 1501, S286 modified

FID = Flame.Ionization Detector.

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PLEASE READ CAREFULLY

This company has undertaken a survey of your promises, equipment, or operations (whichever is pertinent to the type of insurance applied for or provided) for the purpose of supporting the function of risk underwriting. Any recommendation or information provided is not intended as a substitute for advice from a nafety expert or legal counsel you may retain for your own purposes. It is not intended to ampliant any legal duty you may have to provide a antecounter, uncertaints, product or assertion.

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DONALD LAN

CERTIFICATE OF INCORPORATION

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CHEMICAL COMPOUNDS, INC.

THIS IS TO CERTIFY, that I, GEORGE L. GARRISON do hereby associate myself into a corporation under and by virtue of the provisions of an Act of the Legislature of the State of New Jersey entitled "An Act Concerning Corporations" (Revised Statutes of New Jersey, 1937, Title 14 and Title 14A) and the several supplements thereto and acts mandatory thereof and do hereby agree to take the number of shares of capital stock set opposite my name.

SECOND: The location of the principal office i: this State is at 1135 Clifton Avenue, Clifton, New Jersey 0701:

THIRD: The name of the agent therein and in charge thereof upon whom process against this corporation may be served is GEORGE L. GARRISON.

FOURTH: The purposes for which this corporation is formed are as follows: To engage in any activity within the purposes for which corporations may be organized under New Jers Statutes Annotated, Title 14A, entitled "Corporations, General"

FIFTH: The name and post office addresses of

the incorporators and the number of shar es subscribed for by them, the aggregate of such subscription being the total amount of capital stock with which this corporation will commence business, is as follows:

 $\underline{\text{SIXTH}}$: The period of existence of this corporatis unlimited.

SEVENTH: The total authorized capital stock of the corporation is two thousand five hundred (2500) shares of common stock without nominal or par value. All or any part of said shares of common stock, without nominal or par value, may be issued by the corporation from time to time and for such consideration as may be determined and fixed by the unanimous vote of the Board of Directors as provided by law.

George Moncayo

7 Berard Boulevard Oakdale, Long Island, N.Y. 11769

Anna Maria Moncayo

7 Berard Boulevard Oakdale, Long Island, N.Y. 11769

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 16th day of November, 1981.

GEORGE L. GERRISON

L.S

WITNESS:

STATE OF NEW JERSEY)

GOUNTY OF PASSAIC)

November, 1981, before me, a Notary Public of the State of New Jersey, personally appeared GEORGE L. GARRISON who, I am satisfied, is the person named in and who executed the foregoinertificate, and I, having first made known to him the content thereof, he did acknowledge that he signed, sealed and deliver the same as his voluntary act and deed.

JANICE A. INNELLA
A NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 9, 1985



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

SEP 1 5 2003

GENERAL NOTICE LETTER CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Alberto Celleri, President Chemical Compounds Inc. 10 Baldwin Court Roseland, New Jersey 07086

RE: Diamond Alkali Superfund Site

Notice of Potential Liability for

Response Actions in the Lower Passaic River, New Jersey

Dear Mr. Celleri:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release and/or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9601 et seq. Accordingly, EPA is seeking your cooperation in an innovative approach to environmental remediation and restoration activities for the Lower Passaic River.

EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the six-mile stretch of the river, known as the Passaic River Study Area, which is part of the Diamond Alkali Superfund Site ("Site") located in Newark, New Jersey. Based on the results of previous CERCLA remedial investigation activities and other environmental studies, including a reconnaissance study of the Passaic River conducted by the United States Army Corps of Engineers ("USACE"), EPA has further determined that contaminated sediments and other potential sources of hazardous substances exist along the entire 17-mile tidal reach of the Lower Passaic River. Thus, EPA has decided to expand the Study to include the areal extent of contamination to which hazardous substances from the six-mile stretch were transported; and those sources from which hazardous substances outside the six-mile stretch have come to be located within the expanded Study Area.

By this letter, EPA is notifying Chemical Compounds Inc. ("Chemical Compounds") of its potential liability relating to the Site pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a). Under CERCLA, potentially responsible parties ("PRPs") include current and past owners of a facility, as well as persons who arranged for the disposal or treatment of hazardous substances at the Site, or the transport of hazardous substances to the Site.

Internet Address (URL) • http://www.epa.gov
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In recognition of our complementary roles, EPA has formed a partnership with USACE and the New Jersey Department of Transportation-Office of Maritime Resources ("OMR") ["the governmental partnership"] to identify and to address water quality improvement, remediation, and restoration opportunities in the 17-mile Lower Passaic River. This governmental partnership is consistent with a national Memorandum of Understanding ("MOU") executed on July 2, 2002 between EPA and USACE. This MOU calls for the two agencies to cooperate, where appropriate, on environmental remediation and restoration of degraded urban rivers and related resources. In agreeing to implement the MOU, the EPA and USACE will use their existing statutory and regulatory authorities in a coordinated manner. These authorities for EPA include CERCLA, the Clean Water Act, and the Resource Conservation and Recovery Act. The USACE's authority stems from the Water Resources Development Act ("WRDA"). WRDA allows for the use of some federal funds to pay for a portion of the USACE's approved projects related to ecosystem restoration.

For the first phase of the Lower Passaic River Project, the governmental partners are proceeding with an integrated five- to seven-year study to determine an appropriate remediation and restoration plan for the river. The study will involve investigation of environmental impacts and pollution sources, as well as evaluation of alternative actions, leading to recommendations of environmental remediation and restoration activities. This study is being conducted by EPA under the authority of CERCLA and by USACE and OMR, as local sponsor, under WRDA. EPA, USACE, and OMR are coordinating with the New Jersey Department of Environmental Protection and the Federal and State Natural Resource Trustee agencies. EPA, USACE, and OMR estimate that the study will cost approximately \$20 million, with the WRDA and CERCLA shares being about \$10 million each. EPA will be seeking its share of the costs of the study from PRPs.

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were being released from Chemical Compounds' facility located at 29-75 Riverside Avenue in Newark, New Jersey, into the Lower Passaic River. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, Chemical Compounds may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

Enclosed is a list of the other PRPs who have received Notice letters. This list represents EPA's findings on the identities of PRPs to date. We are continuing efforts to locate additional PRPs who have released hazardous substances, directly or indirectly, into the Passaic River. Inclusion on, or exclusion from, the list does not constitute a final determination by EPA concerning the liability of any party for the release or threat of release of hazardous substances at the Site. Be advised that notice of your potential liability at the Site is being forwarded to all parties on this list.

We request that you consider becoming a "cooperating party" for the Lower Passaic River Project. As a cooperating party, you, along with many other such parties, will be expected to fund EPA's share of the study costs. Upon completion of the study, it is expected that CERCLA and WRDA processes will be used to identify the required remediation and restoration programs, as well as the assignment of remediation and restoration costs. At this time, the commitments of the cooperating parties will apply only to the study. For those who choose not to cooperate, EPA may apply the CERCLA enforcement process, pursuant to Sections 106 (a) and 107(a) of CERCLA, 42 U.S.C. §9606(a) and §9607(a) and other laws.

Pursuant to CERCLA Section 113(k), EPA must establish an administrative record that contains documents that form the basis of EPA's decision on the selection of a response action for a site. The administrative record files, which contain the documents related to the response action selected for this Site are located at EPA's Region 2 office (290 Broadway, New York) on the 18th floor. You may call the Records Center at (212) 637-4308 to make an appointment to view the administrative record for the Lower Passaic River Project.

EPA will be holding a meeting with all PRPs on October 29, 2003 at 10:00 AM in Conference Room 27A at the Region 2 office. At that meeting, EPA will provide information about the actions taken to date in the Lower Passaic River, as well as plans for future activities. After the presentation, PRPs will be given the opportunity to caucus, and EPA will return to answer any questions that might be generated during the private session. Please be advised that due to increased security measures, all visitors need to be registered with the security desk in the lobby in order to gain entry to the office. In order to ensure a smooth arrival, you will need to provide EPA with a list of attendees no later than October 15, 2003.

EPA recommends that the cooperating parties select a steering committee to represent the group's interest as soon as possible, since EPA expects a funding commitment for the financing of the CERCLA share of the \$20 million study by mid-November 2003. If you wish to discuss this further, please contact Ms. Alice Yeh, Remedial Project Manager, at (212) 637-4427 or Ms. Kedari Reddy, Assistant Regional Counsel, at (212) 637-3106. Please note that all communications from attorneys should be directed to Ms. Reddy.

Sincerely yours,

George Pavlou, Director

Emergency and Remedial Response Division

Enclosure

cc:

Jim Giannotti

Chemical Compounds Inc

PRPs in Receipt of Notice Letters:

PRP	Legal Counsel
J. Roger Hirl President and Chairman of the Board Occidental Chemical Co. Occidental Tower 5005 LBJ Freeway Dallas, Texas 75244	Paul W. Herring, Esq. Andrews & Kurth L.L.P. 1717 Main Street, Suite 3700 Dallas, Texas 75201
Joseph Gabriel Vice President of Operations 360 North Pastoria Environmental Corp. 1100 Ridgeway Avenue Rochester, New York 14652-6280	Philip Sellinger, Esq. Sills Cummis Zuckerman One Riverfront Plaza Newark, NJ 07102
Robert Ball, President Alcan Aluminum Corporation 100 Erieview Plaza, 29th Floor Cleveland, Ohio 44114	Lawrence Salibra, Esq. Alcan Aluminum Corporation 6060 Parkland Blvd. Mayfield Hts., OH 44124
Mark Epstein, President Alden Leeds Inc. 55 Jacobus Ave. Kearny, New Jersey 07032	Eric Aronson, Esq. Whitman Breed Abbott & Morgan One Gateway Center Newark, NJ 07102
Alan Bendelius, President Alliance Chemical, Inc. Linden Avenue Ridgefield, New Jersey 07657	Fredi L. Pearlmutter, Esq. Cooper, Rose & English, LLP 480 Morris Avenue Summit, New Jersey 07901-1527
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Gary Cappeline, President Ashland Specialty Chemical Co. 5200 Blazer Parkway Dublin, Ohio 43017	Stephen Leermakers, Esq. Ashland Specialty Chemical Co. 5200 Blazer Parkway Dublin, OH 43017
Klaus Peter Loebbe, President BASF Corporation 3000 Continental Drive North Mount Olive, New Jersey 07828	Nan Bernardo, Esq. and Nancy Lake Martin, Esq. BASF Corporation 3000 Continental Drive North Mount Olive, NJ 07828

Joseph Akers, Vice President Bayer Corporation 100 Bayer Road Pittsburgh, Pennsylvania 15205-9741	Gerard Hickel, Esq. Bayer Corporation 100 Bayer Road Pittsburgh, PA 15205-9741
Yvan Dupay, President Benjamin Moore & Co. 51 Chestnut Ridge Road Montvale, New Jersey 07645	Arthur Schulz, Esq. Environmental Counsel 4910 Massachusetts Ave., N.W. Suite 221 Washington, DC 20016
Alberto Celleri, President Chemical Compounds Inc. 10 Baldwin Court Roseland, New Jersey 07086	Jim Giannotti Chemical Compounds Inc. 29-75 Riverside Avenue Newark, NJ 07104
President Chris-Craft Industries, Inc. 767 Fifth Avenue, 46th Floor New York, New York 10153	Brian Kelly, Esq. Chris-Craft Industries, Inc. 767 Fifth Avenue, 46th Floor New York, NY 10153
John Guffey, President Coltec Industries, Inc. 3 Coliseum Centre 2550 West Tyvola Road Charlotte, North Carolina 28217	John R. Mayo, Esq. Coltec Industries, Inc. 430 Park Avenue New York, NY 10022
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Martin Benante, Chairman Curtiss-Wright Corp. 4 Becker Farm Road Roseland, New Jersey 07068	James Maher, Esq. Curtiss-Wright Corp. 4 Becker Farm Road Roseland, NJ 07068
Antonio Perez, President Eastman Kodak Company 343 State Street Rochester, New York 14650	Elliot Stern, Esq. Eastman Kodak Company 343 State Street Rochester, NY 14650
Edgar Woolard, Chairman E.I. du Pont de Nemours & Co. 1007 Market Street Wilmington, Delaware 19898	Bernard J. Reilly, Esq. Corporate Counsel E.I. du Pont de Nemours & Co. 1007 Market Street Wilmington, DE 19898

David Weisman, CEO Elan Chemical Company 268 Doremus Ave. Newark, New Jersey 07105	Jeffrey Schwartz, Esq. Sarber Schlesinger Satz & Goldstein One Gateway Center Newark, NJ 07102
Al Reisch, President E M Sergeant Pulp & Chemical Co. Inc. 6 Chelsea Road Clifton, New Jersey 07102	None
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