



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

Joseph M. Karas  
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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.

Sincerely,

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	_____	_____

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	YES	NO
Silver	_____	_____
Titanium	_____	_____
Zinc	_____	_____
Cyanide	_____	_____
PCBs	_____	_____
Basic Lead Carbonate (White Lead)	_____	_____

*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.*

i) Describe the chemical composition of these hazardous substances

*Still sludge would have consisted of 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 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.

*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 information was 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.

<i>Joseph Karas:</i>	<i>Assistant Counsel PPG Industries Inc., One PPG Place., Pittsburgh, PA 15272 412-434-241; No personal knowledge</i>
<i>Thomas Ebbert:</i>	<i>Environmental Engineering Associate PPG Industries, Inc., 4325 Rosanna Drive, Allison Park, PA 15101 412-492-5478; No personal knowledge</i>
<i>Greg Norman:</i>	<i>Process Technician PPG Industries, Inc., 151 Colfax Street, Springdale, PA 15144 412-274-3454; No personal knowledge</i>
<i>Bill Silvestri:</i>	<i>PPG's Cleveland Manager, Ohio facility; 216-671-0050 Questions 6, 8 &amp; 10;</i>
<i>Tom Price</i>	<i>PPG's C&amp;R Engineering Office, Allison Park, PA; 412-492-5477 Question 8;</i>
<i>Pat Racioppi</i>	<i>Retired: Florida; Question 5, 6, 8 &amp; 10</i>
<i>Tom Risch</i>	<i>Retired: Pittsburgh, PA; 412-487-6219 Questions 2, 5, 6, 8 &amp; 10.</i>

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

SEP 15 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.

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

**851860002**

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 18<sup>th</sup> 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.

851860003

**PRPs in Receipt of Notice Letters:**

<b>PRP</b>	<b>Legal Counsel</b>
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
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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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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

**851860004**

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
Roger Marcus, President Congoleum Corporation 3705 Quakerbridge Road Mercerville, New Jersey 08619	Russell Hewit, Esq. Dughi & Hewit 340 North Avenue Cranford, NJ 07016
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

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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

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

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

851860008

**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, lacquers, 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 river. Although my knowledge is limited regarding the use of these sewer lines, each building had floor drains that were covered by grates.
5. I have witnessed PPG employees sweeping residue, including spills of products and raw materials, down these floor drains.

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6. I have witnessed flooding of the Passaic River at the site on several instances where portions of the facility were underwater.

Willie Moore  
Willie Moore

STATE OF NEW JERSEY

COUNTY OF UNION

§  
§  
§

Before me, Jeffrey F. McDermott, a notary public, on this day personally appeared Willie Moore, known to me (or proved to me on the oath of Willie Moore) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this 26<sup>th</sup> day of September, 1994.

JEFFREY F. McDERMOTT  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires December 6, 1998

Jeffrey F. McDermott  
Notary Public

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

INVESTIGATION

**Case Number:** 93-10-05-0736

**PAC:**

**File:**

**Investigator:** Bruce F Doyle  
Joe Hoyle

**Time Arrived:** 0730

**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 #:**

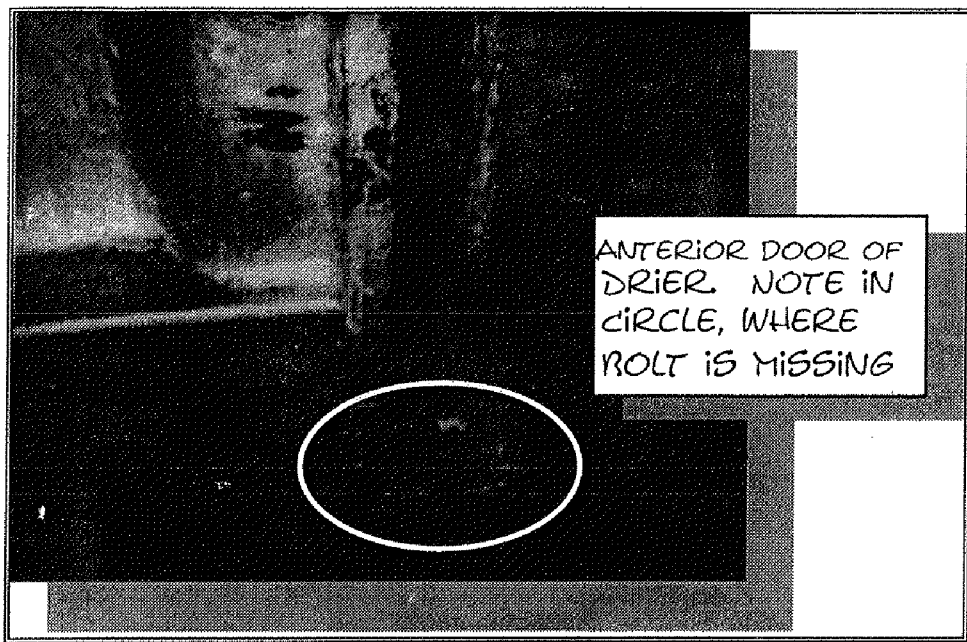
**Origin of Complaint:** Newark Fire Department Dispatch

**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

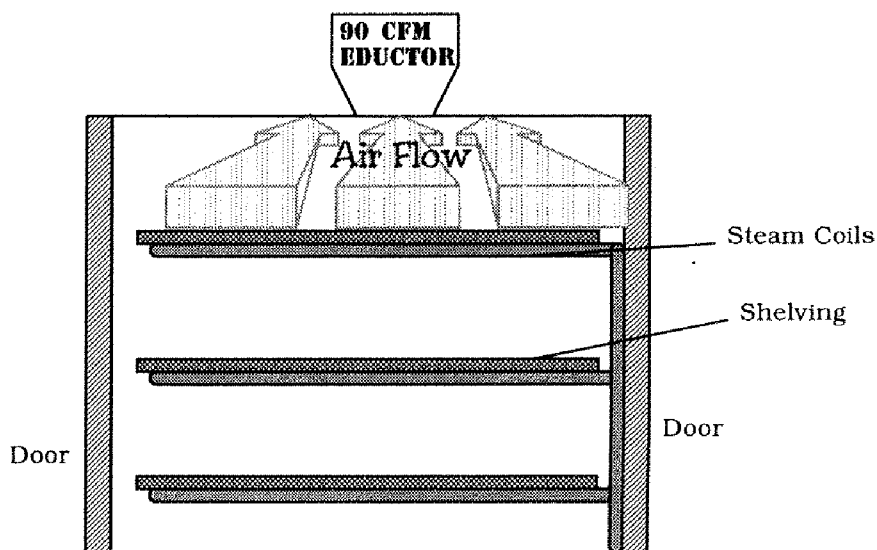
problem of the scope indicated by Chief Apostolico. Thus the area of investigation was broadened to the surrounding machinery. Next to the press, a large roughly cubic device was observed. This device was painted silver (recently) and appeared from its design to be a drier or cooker. The device was in 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 ( $C_{12}H_{19}N_3O_5$ ), 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). Whether 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 400°F. At this temperature, the 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 whether this was an effect of the reaction/decomposition or a contributing factor.

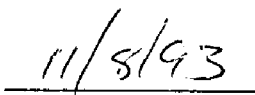
After conferring with Alberto Celleri and Chief Anthony Apostolico, Newark FD, it was determined that the cause of the incident required further investigation by the RP to determine the exact cause to thus prevent it from happening again. While the organic mass did not exit the facility, thereby falling 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.

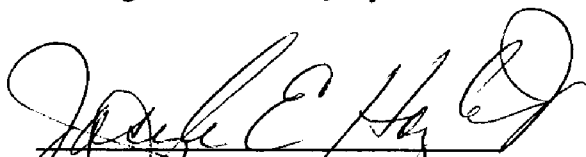
**Conclusions:** BER 1 responded to the report of a chemical fire in the vicinity of 29 Riverside Avenue in Newark, Essex County. The fire was reported to the DEPE by Newark FD who also requested assistance. Initially, the fire was believed to have originated from the combustion of an unknown liquid 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

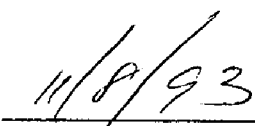
the damage to the apparatus. The fire was found soon enough in its course to preclude excessive damage of the facility however, the material did contaminated the main floor of the building. The material was found to be a Nitrated Aniline dye which would be expected to decompose to oxides of nitrogen 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 BFR.

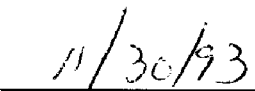
  
Investigator Bruce F. Doyle

  
Date

  
Investigator Joseph E. Hoyle

  
Date

  
Supervisor

  
Date

New Jersey Department of Environmental Protection  
COMMUNICATIONS CENTER NOTIFICATION REPORT

Received:10/05/93  
Operator:ROGER

TD Log # 16921  
Case # 93-10-5-1110-43

Notification Type: Other

Reported By B.DOYLE Affiliation NJDEPE-DRPSR-BER Phone  
Street Address Municipality State

Incident Location: Facility  
Site CHEMICALS COMPOUNDS INC Phone 201-850-1436  
Street Address Municipality County State  
29-75 RIVERSIDE AVE NEWARK ESSEX NJ  
Location Type Industrial Incident Date 10/05/93 Time 0700

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 Phone 201-850-1436  
Contact ALBERTO CELLERI Title PRES  
Street Address Municipality County State  
29-75 RIVERSIDE AVE NEWARK ESSEX NJ

OFFICIALS NOTIFIED

NAME	TITLE	PHONE	DATE	TIME
NJSP :				
MUNIC: NEWARK CITY		201-733-7400	10/05	
OTHER:				

Name	Affiliation	Method	Date	Time	T/M
1. B.DOYLE	DRPSR ER1	Office,Faxed	10/05	1110	T
2.					
3.					

COMMENTS

REFER 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

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

CHEMICAL FAMILY: Nitrated Aniline  
FORMULA: C12H19N3O5

\*\*\* HAZARDOUS INGREDIENTS \*\*\*

INGREDIENT:	PERCENT	TLV
HC Blue 2	90%	none est.

\*\*\* PHYSICAL DATA \*\*\*

APPEARANCE:	Odorless deep purple powder
SPECIFIC GRAVITY:	Not Applicable
BOILING POINT (DEG F):	Decomposes
VAPOR PRESSURE (mm Hg):	Not Applicable
SOLUBILITY IN WATER:	Slight
PERCENT VOLATILE BY VOLUME:	0.1 - 1.0
EVAPORATION RATE:	< 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 Giannotti

jpg/JG

c.c: AC/SG

ACF000019

TIERRA-B-004378



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:

	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	___	___
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.
  - 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

State of New Jersey \_\_\_\_\_:

County of Essex \_\_\_\_\_:

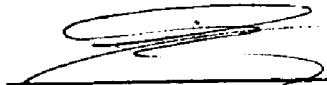
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, 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.

Alberto Celleri  
NAME (print or type)

President  
TITLE (print or type)

  
SIGNATURE

Sworn to before me this  
day of 29<sup>th</sup> Jan., 1997

  
Notary Public

EDUARDO M. ACOSTA  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Aug. 18, 1999

ACF000027

TIERRA-B-004386



**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.)

ACF000028

TIERRA-B-004387

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

Hazardous Material	Yes	No
2,3,7,8 Tetrachlorodibenzo-p-dioxin or other Dioxin Compounds		X
Acetic Acid	X	
Adipic Acid	X	
Aniline	X	
Benzene	X	
Benzo(a)anthracene		X
Benzoic Acid	X	
Benzy Chloride		X
Butyl Benzyl Phthalate		X
Chlorobenzene	X	
Chloroethylene		X
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		X
Pyrene		X
Tetrachlorobenzene		X
Tetrachloroethane		X
Tetrachloroethylene	X	
Trichloroethane		X
Trichloroethylene		X
Toluene	X	
Xylene	X	

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

4 (a).

CONFIDENTIAL

ACF000030

TIERRA-B-004389

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:

<b>Name</b>	<b>Title</b>	<b>Description of Responsibility</b>
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 Arvonnia, VA 23004	Oldover Corporation P.O. Box 68 Rt. 1, State Rd. 652 Arvonnia, 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

ACF000033

TIERRA-B-004392

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
Raw Materials  or  Laboratory Supplies	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
	Benzoic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
	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
	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
	Toluene	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 Data	By-Products found in the waste water stream: Aniline, Benzene, Benzoic Acid, Chlorobenzene, Chloroform, Ethyl Benzene, Methanol, Methylene Chloride Naphthalene, 2-NitroPhenol, Tetrachloroethylene, Toluene, Xylene, Lead, Zinc, Cyanide	55 gallon drum - Waste  400 - 4,000 gallon S/S Storage Tank  10,000 gallon S/S Storage Tank  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
Acetic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Duso Chemical	173 Smith Street Poughkeepsie, N.Y. 12602
Adipic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	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
Toluene	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	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
Acetic Acid	PCI Scientific Supply, Inc.	41 Plymouth Street Fairfield, N.J. 07004
Adipic Acid	J.T. Baker	89 Newbury Street Suite 103 Danvers, MA 01923
Benzoic Acid		
Chloroform		
Methylene Chloride		
Methanol	Fisher Scientific	711 Forbes Avenue Pittsburgh, PA 15219-4785
Toluene		
Xylene		

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 Arvonnia, 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 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 contaminants. 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 contaminants. 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 situation. 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 between 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 centrifuge which is used to remove the spent acid from his product to the CWM tanker located in the yard outside of the process area.

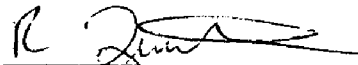
We then proceeded to the stairs outside of the process area where two 5000 gallon tank trailers are parked. Mr. Sullivan stated they pump their process wastewater to the tanker which is then shipped to Chemical Waste Management.

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 vacuum pump to pump the water into 55 gallon drums. When ENSI began pumping the wastewater, the Criminal Justice Officials felt that the situation was under control and left the facility.

RECOMMENDATION:

I recommend that Chemical Compounds be cited 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. Quintieri

RQ/mc

**FIELD NOTICE OF VIOLATIONS**

CASE NO. 92-01-07-1025 DATE 01/07/92  
CASE NAME CHEMICAL COMPOUNDS INC. ILLEGAL DUMPING  
INCIDENT LOCATION PASSAIC RIVER + RIVERSIDE AVE., NEWARK  
RESPONSIBLE PARTY ADDRESS CHEMICAL COMPOUNDS  
29-75 Riverside Ave., Newark N.J. 07104  
RESPONSIBLE PARTY REPRESENTATIVE AL CELLERI / HAROLD SULLIVAN

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.

- NJSA 58:10-23.11 c, e SPILL COMPENSATION AND CONTROL ACT
- NJSA 23:5-28 POLLUTION AND OBSTRUCTION OF WATER
- NJAC 7:26- \_\_\_\_\_ HAZARDOUS WASTE REGULATIONS
- \_\_\_\_\_
- \_\_\_\_\_

DESCRIPTION OF VIOLATION Discharge + non-notification of a discharge of a hazardous substance into the waters and onto the land of the State of N.J. pursuant to the stipulations of the Spill Compensation and Control Act of the State of N.J.

Within immediately days of receipt of this notice, you shall submit in writing, to the address and investigator indicated below, an account of the incident and corrective measures taken to attain compliance.

Investigator Matthew Garamone  
Address NJDEPE - Emergency Response Region I  
2 Babcock Pl., West-Orange N.J. 07052

New Jersey Department of Environmental Protection  
 COMMUNICATIONS CENTER NOTIFICATION REPORT

*vac*  
*Code*  
*TFF*

Received: 1/07/92  
 Operator: JIMH

TD Log # 322  
 Case # 92-1-7-1025-33

Notification Type: Other

Reported By Affiliation Phone  
 PICCITTO NJSP MARINE 201-578-8173  
 Street Address Municipality State

Incident Location: Other

Site NEXT TO Phone  
 Street Address Municipality County State  
 1500 MCCARTHER HWY NEWARK ESSEX NJ  
 Location Type Industrial Incident Date 1/07/92 Time 1016

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 INTO RIVER

Responsible Party Known

Party POLITICAL COMP. INC Phone  
 Contact Title  
 Street Address Municipality County State  
 MCCARTHER HWY NEWARK ESSEX NJ

OFFICIALS NOTIFIED

NAME	TITLE	PHONE	DATE	TIME
NJSP : OEM		609-882-2000	1/07	
MUNIC: NEWARK CITY	OPER 41	201-733-7400	1/07	1034
OTHER:				

Name	Affiliation	Method	Date	Time	T/M
1. C. GIBBONS	DRPSR ER1	Office	1/07	1030	T
2. <i>M. GARIMONTE</i>	OEP	Monitoring Faxed	1/07		T
3.	DFG	HQ1 Faxed	1/07		T

COMMENTS

New Jersey Department of Environmental Protection  
 COMMUNICATIONS CENTER NOTIFICATION REPORT

Received: 1/09/92  
 Operator: RICH

TD Log # 472  
 Case # 92-1-9-1027-18

Notification Type: Other

Reported By Affiliation Phone  
 INV VINCE CINO DIV CRIMINAL JUST. 908-686-0364  
 Street Address Municipality State

Incident Location: Facility  
 Site CHEMICAL COMPOUNDS INC Phone 201-485-3211  
 Street Address Municipality County State  
 29-75 RIVERSIDE AVE NEWARK ESSEX NJ  
 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  
 Contact ALBERTO CELLERI Title OWNER  
 Street Address Municipality County State  
 29-75 RIVERSIDE AVE NEWARK ESSEX NJ

OFFICIALS NOTIFIED

NAME	TITLE	PHONE	DATE	TIME
NJSP : OEM		609-882-2000	1/09	
MUNIC: NEWARK CITY		201-733-7400	1/09	
OTHER:				

Name	Affiliation	Method	Date	Time	T/M
1. CHRIS GIBBONS	DRPSR ER1	Office, Faxed	1/09	1028	T
2.	OEP	Monitoring Faxed	1/09		T
3.					

COMMENTS

RESP 16 ENROUTE @ 1039 HRS

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DUTY OFFICER NOTIFICATION REPORT

PAGE 1 OF 1  
Ac Code  
TFF

CASE NO. 92 - 01 - 07 - 1025  
(Yr) (Mo) (Day) (Time)

DATE 01 - 07 - 91 REC'D BY R-16 TIME \_\_\_\_\_  
(Mo) (Day) (Yr)

**INCIDENT REPORT BY:**  
 Name Operator Pichitto Phone 578-8173  
 Street \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_  
 Affiliation/Title \_\_\_\_\_

**INCIDENT LOCATION:** \_\_\_\_\_ Transportation \_\_\_\_\_ Facility \_\_\_\_\_ Other: \_\_\_\_\_  
 Name (Site): 1500 McCarter Highway Phone \_\_\_\_\_  
 Street \_\_\_\_\_  
 City Newark County Essex State \_\_\_\_\_ Zip Code \_\_\_\_\_  
 Date of Incident: 01 - 07 - 91 Time: 1016  
 (Mo) (Day) (Yr)

**IDENTITY OF SUBSTANCE(S) SPILLED, RELEASED, ETC.:** \_\_\_\_\_ Suspected \_\_\_\_\_ Unknown  
 Name of Substance(s) [Gas, Liquid, Solid]: unk liquid  
 Amount Released/Spilled \_\_\_\_\_ Actual \_\_\_\_\_ Potential \_\_\_\_\_ Estimated \_\_\_\_\_ Substance Contained Y (N) U  
 Type of Release/Spill: \_\_\_\_\_ Terminated \_\_\_\_\_ Continuo: \_\_\_\_\_ Intermittent \_\_\_\_\_ Hazardous Material Y N U

**INCIDENT DESCRIPTION:**  
 \_\_\_\_\_ Fire \_\_\_\_\_ Explosion \_\_\_\_\_ Air Rel \_\_\_\_\_ Spill \_\_\_\_\_ MVA \_\_\_\_\_ Derailment \_\_\_\_\_ Smoke/Dust  
 \_\_\_\_\_ Odors \_\_\_\_\_ Sewage \_\_\_\_\_ NJPDES \_\_\_\_\_ Noise \_\_\_\_\_ Wildlife \_\_\_\_\_ Illegal Dumping \_\_\_\_\_ Drums  
 \_\_\_\_\_ Equip Start-Up/Shutdown, Equip Fail/Upset, etc. \_\_\_\_\_  
 \_\_\_\_\_ Other (specify) \_\_\_\_\_

Injuries Y (N) U Public Exposure (Y) N U  
 Facility Evacuation Y (N) U Fire Department at Scene Y (N) U  
 Population Evacuation Y (N) U Police at Scene (Y) N U  
 Potable Water Source Y (N) U Assistance Requested (Y) N U  
 Contamination of \_\_\_\_\_ Air \_\_\_\_\_ Land \_\_\_\_\_ Water Precipitation Y N U  
 Receiving Water Passaic River Wind Direction/Speed \_\_\_\_\_

Location Type: \_\_\_\_\_ Residential \_\_\_\_\_ Industrial \_\_\_\_\_ Commercial \_\_\_\_\_ Rural \_\_\_\_\_ Sensitive Population (Hosp., School, Nurs. Home)

**STATUS AT INCIDENT SCENE** Dumping from pipe onto ground,

**RESPONSIBLE PARTY:** \_\_\_\_\_ Suspected \_\_\_\_\_ Unknown  
 Company Name Polymat (Company) Inc. Phone \_\_\_\_\_  
 Contact \_\_\_\_\_ Title \_\_\_\_\_  
 Street 1500 McCarter Highway  
 City Newark County Essex State \_\_\_\_\_ Zip Code \_\_\_\_\_

**OFFICIALS NOTIFIED (Name/Title):**  
 NJSP: \_\_\_\_\_ / \_\_\_\_\_ Phone \_\_\_\_\_ Date/Time \_\_\_\_\_ / \_\_\_\_\_ (T/M)

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:

Location: Chemical Compounds Inc.  
Address: 29-75 Riverside Avenue  
Newark, Essex County

Time Departed:

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.

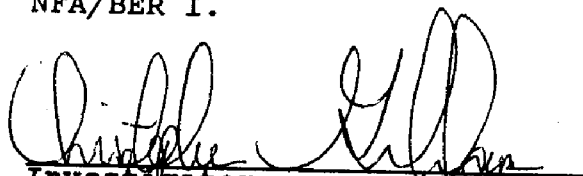
**Findings:** Inspector Gibbons responded to the above location to investigate illegal dumping from Chemical Compound Inc. (see report case numbers 92-01-07-1025 and 92-01-08-1147). This request for a response came from Investigator Vince Cino, DCJ who was notified by Napp Grecko Corp. of continuing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

**Recommendations:** This case was referred to OEP-Metro and DFG & W. NFA/BER I.

  
Investigator

1-15-92  
Date

\_\_\_\_\_  
Supervisor

\_\_\_\_\_  
Date

13A 8774

000036

KERBY, COOPER, ENGLISH, DANIS & GARVIN  
COUNSELLORS AT LAW

480 MORRIS AVENUE

SUMMIT, NEW JERSEY 07901-1583

908-273-1212

FAX 908-273-8922

RUSSELL T. KERBY, JR.  
JOHN W. COOPER  
JERRY FITZGERALD ENGLISH  
ARTHUR H. GARVIN III  
GARY F. DANIS, P.E.

RONALD J. TELL  
STEVEN S. GOLDENBERG  
OF COUNSEL

RICHARD C. MOSER  
1940-1992

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 Consent Order.

Very truly yours,



Stephen R. Geller

SRG:pbk  
cc: Harold Sullivan  
John Sabo  
Jerry Fitzgerald English  
Gary F. Danis

**Passaic Valley  
Sewerage Commissioners**

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NEWARK, N.J. 07105  
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Fax: (201) 344-2951

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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 Act (CWEA).  
TIERRA-B-004412

**RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS**

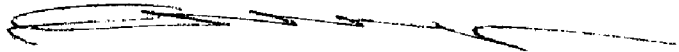
June 7, 1994

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



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

Passaic Valley  
Sewerage Commissioners

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(201) 344-1800  
Fax: (201) 344-2951

ROBERT J. DAVENPORT  
EXECUTIVE DIRECTOR

PETER G. SHERIDAN  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

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 ensue 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 <sup>that</sup> 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

A handwritten signature in cursive script that reads "Robert J. Davenport" followed by a circled number "44".

Robert J. Davenport  
Executive Director

RJD/mc

cc: Frank P. D'Ascensio  
Carmen DellaPia  
Andy Caltagirone  
Gabriel M. Ambrosio, Esq.  
City of Newark

**Passaic Valley  
Sewerage Commissioners**

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Fax: (201) 344-2951

ROBERT J. DAVENPORT  
EXECUTIVE DIRECTOR

PETER G. SHERIDAN  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

February 9, 1995 ✓

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

Certified Mail  
P 258 625 759

**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.

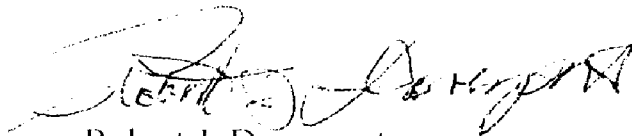
February 9, 1995

Page 3

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

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

A handwritten signature in black ink, appearing to read "Robert J. Davenport". The signature is written in a cursive style with a large initial "R".

Robert J. Davenport  
Executive Director

RJD/mc

cc: Frank P. D'Ascensio  
Gabriel M. Ambrosio, Esq.  
City of Newark  
Carmen DellaPia

INVESTIGATION

CASE #: 92-01-07-1025 DWM FILE #: 07-14-518  
 INVESTIGATOR: Greulich, Gary DATE: 3/11/92 TIME ARRIVED: 1  
 LOCATION: Chemical Compounds PROPERTY OWNER: Chemical Compounds  
 ADDRESS: 29-75 Riverside Ave MAILING ADDRESS: 29-75 Riverside Ave  
Newark County: Essex Newark, N.J. 07104  
 BLOCK: 614 LOT: 66 RESPONSIBLE PARTY: same  
 LOCATION TELEPHONE #: 485-3215 ADDRESS: \_\_\_\_\_  
 EPA ID #: \_\_\_\_\_  
 LOCAL HEALTH DEPT, REP: N/A TELEPHONE #: N/A  
 ORIGIN OF COMPLAINT: \_\_\_\_\_ TELEPHONE #: \_\_\_\_\_  
 NATURE OF COMPLAINT: Illegal dumping of unknown liquid  
 PHOTOGRAPHS TAKEN: N/A SAMPLE #: N/A  
 FINDINGS: \_\_\_\_\_

On Jan 10, 1992, in response to the above incident, this writer responded to Chemical Compounds to investigate the complaint of illegal dumping. Upon arrival at the site I was greeted by Mr. Harold Sullivan, President of Chemical Compounds. The following background information was detailed by Mr. Sullivan.

The sanitary line which the company presently uses for ~~normal~~ normal sanitary waste was plugged by the neighboring facility because of the unpleasant vapors which were emanating from the manhole behind his building. These odors came from the washing down of a small spill in the facility into the floor drains which discharge through the sanitary line. As a result of the sanitary line being unusable the company was unable to operate various pumps which pump the waste water (water-soluble acid) into a holding tank. Once the mixture is in this tank, it is gravity feed into one of two 5000 gallon tank wagons located on the side of the facility. The waste water mixture is disposed of under manifest as X-900 non-hazardous to Chemical Waste Management in Newark. As the workers

[Signature]  
Supervisor Signature

\_\_\_\_\_  
Investigator Signature

COPIES: White - DWM File Yellow - Local Health Dept. Pink - Investigator

INVESTIGATION

CASE # 92-01-07-1075

DATE: 3/11/92

FINDINGS AND SUMMARY:

were unable to use the pumps to put the material into the tank holding tank, a worker discharged the material onto the ground next to the tanker trucks. This discharge occurred prior to Mr. Sullivan arrival for the day.

In attempts to minimize the problems caused by the discharge 11 drums of liquid were generated by EUST from Newark and soil samples were taken to assess the soil conditions on the area of the discharge. The 11 drums of liquid will be disposed of through CWM, or to P&S C should the company get its permit, the drummed material is the same as their normal non hazardous material presently shipped to CWM.

To prevent this problem in the future the company is going to install a new connection for the sanitary line that does not run under the neighbors property and is applying for a permit to discharge their waste water (process) to PUSC. Upon review of the soil analysis there does not appear to be any remaining contamination, surficial, above their presently established acceptable levels. At the present time no further action is recommended for this incident

  
Supervisor Signature

  
Investigator Signature

COPIES:

White - DWM File

Yellow - Local Health Dept.

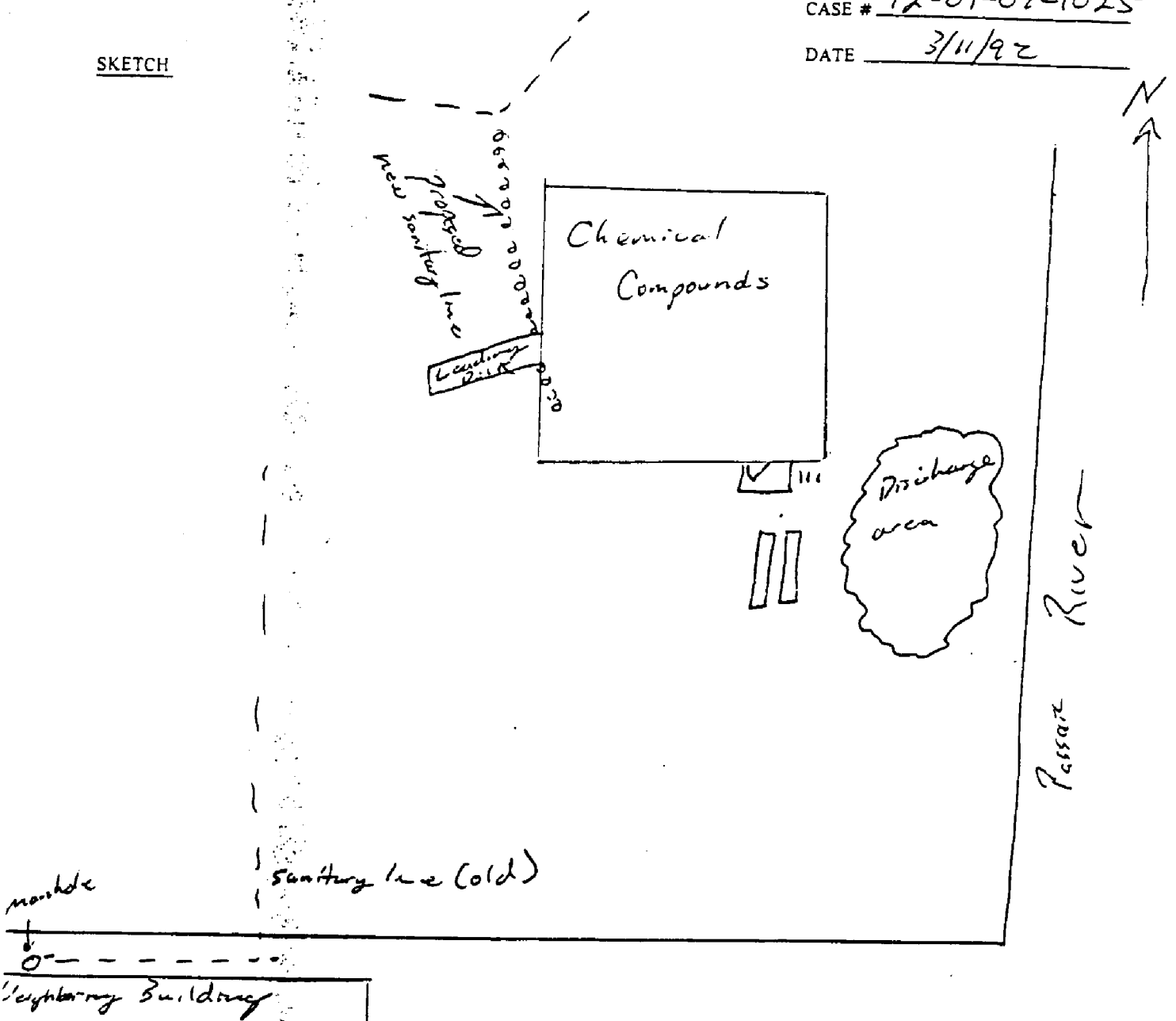
Pink - Investigator

INVESTIGATION

CASE # 92-01-07-1025

DATE 3/11/92

SKETCH



SCALE: Not to Scale

Include directional arrow.

\_\_\_\_\_  
Supervisor Signature

\_\_\_\_\_  
Investigator Signature

COPIES:

White - DWM File

Yellow - Local Health Dept.

Pink - Investigator

**From:**  
**Chemical Compounds Inc.**  
**29 - 75 Riverside Ave.**  
**Building # 17**  
**Newark, N.J. 07104**

**To:**  
**Ms. Amelia Wagner**  
**Office of Regional Counsel**  
**Emergency And Remedial Response Division**  
**U.S. Environmental Protection Agency**  
**290 Broadway, 17th Floor**  
**New York, N.Y. 10007-1866**

**845340001**



# 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 Giannotti  
jg./JG  
c.c: AC/SG

RECEIVED  
AUG 09 1996

845340002

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:

	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	---	---
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.
  - 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.

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\*\*\*\***

**845340012**



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:

<b>Name</b>	<b>Title</b>	<b>Description of Responsibility</b>
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

845340013

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

845340014

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
Raw Materials  or  Laboratory Supplies	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
	Benzoic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
	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
	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
	Toluene	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 Data	By-Products found in the waste water stream: Aniline, Benzene, Benzoic Acid, Chlorobenzene, Chloroform, Ethyl Benzene, Methanol, Methylene Chloride Naphthalene, 2-Nitrophenol, Tetrachloroethylene, Toluene, Xylene, Lead, Zinc, Cyanide	55 gallon drum - Waste  400 - 4,000 gallon S/S Storage Tank  10,000 gallon S/S Storage Tank  5,000 gallon Tanker Trucks - Waste

845340015

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.

845340016

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.

845340017

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 disburshed 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.

**845340018**

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.)

**845340019**

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
	Duso Chemical	173 Smith Street Poughkeepsie, N.Y. 12602
Adipic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	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
Toluene	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Xylene	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901

845340020



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

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

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	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 Flammable Liquids	Freehold Cartage Inc.	Systech Environmental 11397 County Rd. 176 Paulding, OH 45879

845340021

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 contaminants. 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 contaminants. 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.

845340022

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.

**845340023**

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey \_\_\_\_\_:

County of Essex \_\_\_\_\_:

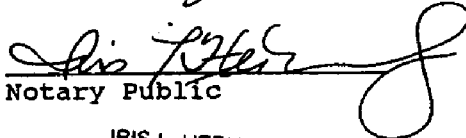
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, 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.

Alberto Celleri  
NAME (print or type)

President  
TITLE (print or type)

  
SIGNATURE

Sworn to before me this 8th  
day of August, 1996

  
Notary Public

IRIS L. HERNANDEZ  
NOTARY PUBLIC OF NEW JERSEY  
MY COMMISSION EXPIRES SEPT. 8, 1999

845340024

845340025



**DEED**

Industrial Development  
Associates

TO

Chemical Compounds, Inc.

Grantor.

Grantee.

Record and return to:

George Garrison, Esquire  
1115 Clifton Avenue  
Clifton, New Jersey 07015

845340026

# DEED

This Deed is made on July 1, 1985.

BETWEEN INDUSTRIAL DEVELOPMENT ASSOCIATES,  
141 Lanza Avenue  
Garfield, New Jersey

a corporation of the state of New Jersey  
having its principal office at 141 Lanza Avenue, Garfield, New Jersey  
referred to as the Grantor.

AND Chemical Compounds, Inc.

whose post office address is 10 Valley Road, Stanhope, New Jersey  
referred to as the Grantee.

The word "Grantee" shall mean all Grantees listed above

**Transfer of Ownership.** The Grantor grants and conveys (transfers ownership of) the property described below to the Grantee. This transfer is made for the sum of **One Hundred Ninety Five Thousand (\$195,000.00) Dollars and 00/100**

The Grantor acknowledges receipt of this money.

**Tax Map Reference.** (N.J.S.A. 46.15-21) Municipality of Newark

Block No. 614 Lot No. 66 Account No.

No property tax identification number is available on the date of this Deed. (check box if applicable.)

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

Being known and described as proposed lot "C" as laid out and described on a certain subdivision map entitled "Proposed Subdivision Lot 1 - Block 614 Newark Tax Map" prepared by Horrie, Macdonald & Watson, dated June 25, 1984, and filed in the Essex County Register's Office on February 4, 1985 as Map No. 1594. This conveyance is made subject to and along with the right of ingress and egress along, over and through the easement area laid out and provided for in the aforementioned subdivision map.

See Schedule A attached hereto for additional description.

Prepared by:

RECEIVED & RECORDED  
REGISTER'S OFFICE  
SEP 19 11 22 AM '85  
Essex County Register

845340027

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:

- (1) 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 feet to a point; thence:
- (3) North 51 degrees 15 minutes 40seconds West 100.00<sup>n</sup>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 B; 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 Map of the City of Newark

845340028



The conveyance of the foregoing easement 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 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 (5%) percent of the cost of snow removal, guard service, and exterior janitorial and maintenance service attributable 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 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 premises 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 Grantee 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.

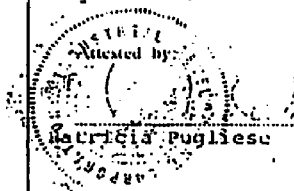
845340029

99-4936 DE 215

61

Promises by Grantor. The Grantor promises that the Grantor has done no act to encumber 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 rights 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 Grantor's proper corporate officers as of the date at the top of the first page. Its corporate seal is affixed



BY: INDUSTRIAL DEVELOPMENT ASSOCIATES, INC. INDUSTRIAL DEVELOPMENT CORPORATION General Partner

By: Anthony V. Pugliese, President

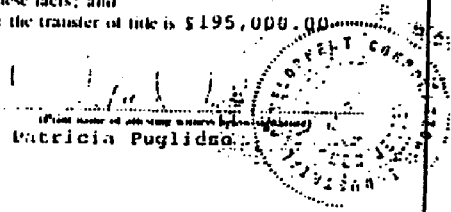
STATE OF NEW JERSEY, COUNTY OF Essex SS.

I CERTIFY that on July 1, 1986 Patricia Pugliese

- personally came before me and this person acknowledged under oath, to my satisfaction, that:
  - (a) this person is the secretary of Industrial Development Associates the corporation named in this Deed;
  - (b) this person is the attesting witness to the signing of this Deed by the proper corporate officer who is Anthony V. Pugliese, III the President of the corporation;
  - (c) this Deed was signed and delivered by the corporation as its voluntary act duly authorized by a proper resolution of its Board of Directors;
  - (d) this person knows the proper seal of the corporation which was affixed to this Deed;
  - (e) this person signed this proof to attest to the truth of these facts; and
  - (f) the full and actual consideration paid or to be paid for the transfer of title is \$195,000.00 (Such consideration is defined in N.J.S.A. 46:15-5)

Signed and sworn to before me on July 1, 1986

Henry Paper, an Attorney at Law of the State of New Jersey

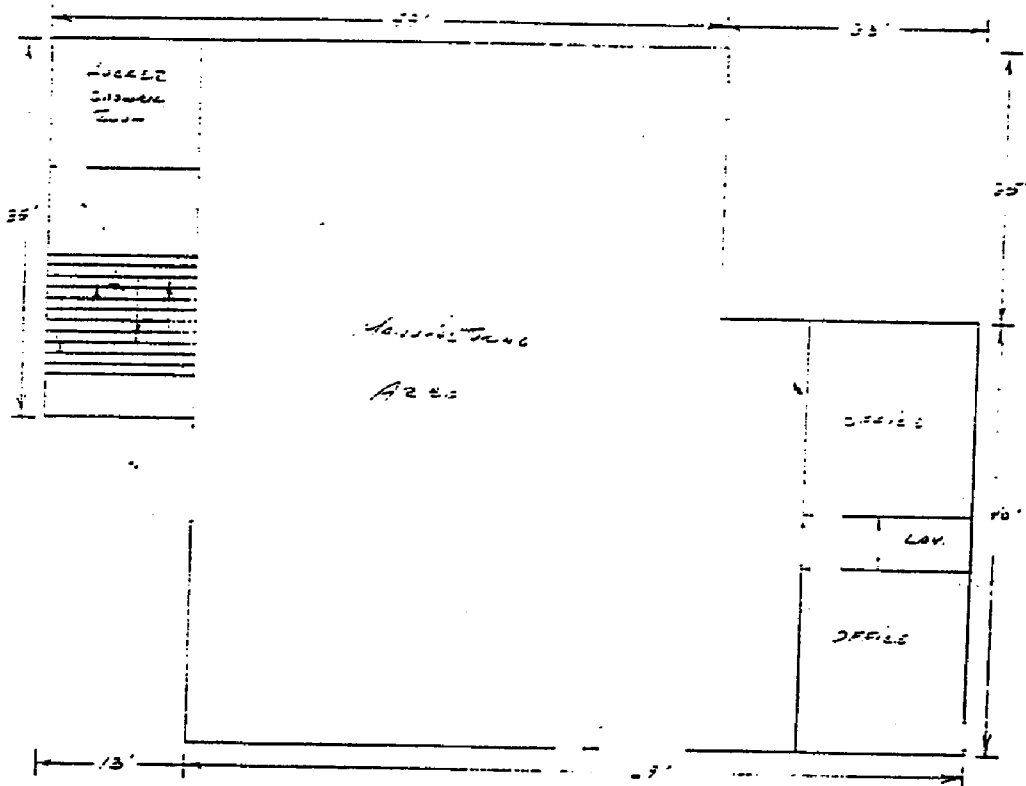


Patricia Pugliese

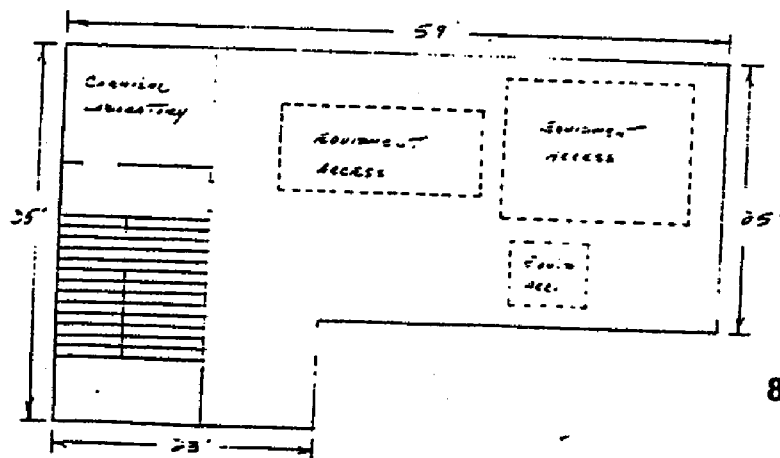
Prepared by: N.J.S.A. 46:15-11 (Print signer's name below signature)

845340030

DIAGRAM OF THE BUILDING



70' File



845340031



## CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park  
29-75 Riverside Avenue - Newark, New Jersey 07104  
201-875-1117

*END — Dec 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 covenant 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.

By Harold E. Sullivan  
Harold E. Sullivan  
President

845340032



**PASSAIC VALLEY SEWERAGE COMMISSIONERS  
SEWER CONNECTION PERMIT**

**PERMIT #**

20407122

(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.

[Redacted]

(herein, after referred to as the Permittee)  
is authorized to discharge from a facility located at

29-75 Riverside Avenue - Building #17

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.

**EFFECTIVE DATE**

07/20/92

**EXPIRATION DATE**

07/20/97

**PASSAIC VALLEY SEWERAGE COMMISSIONERS**

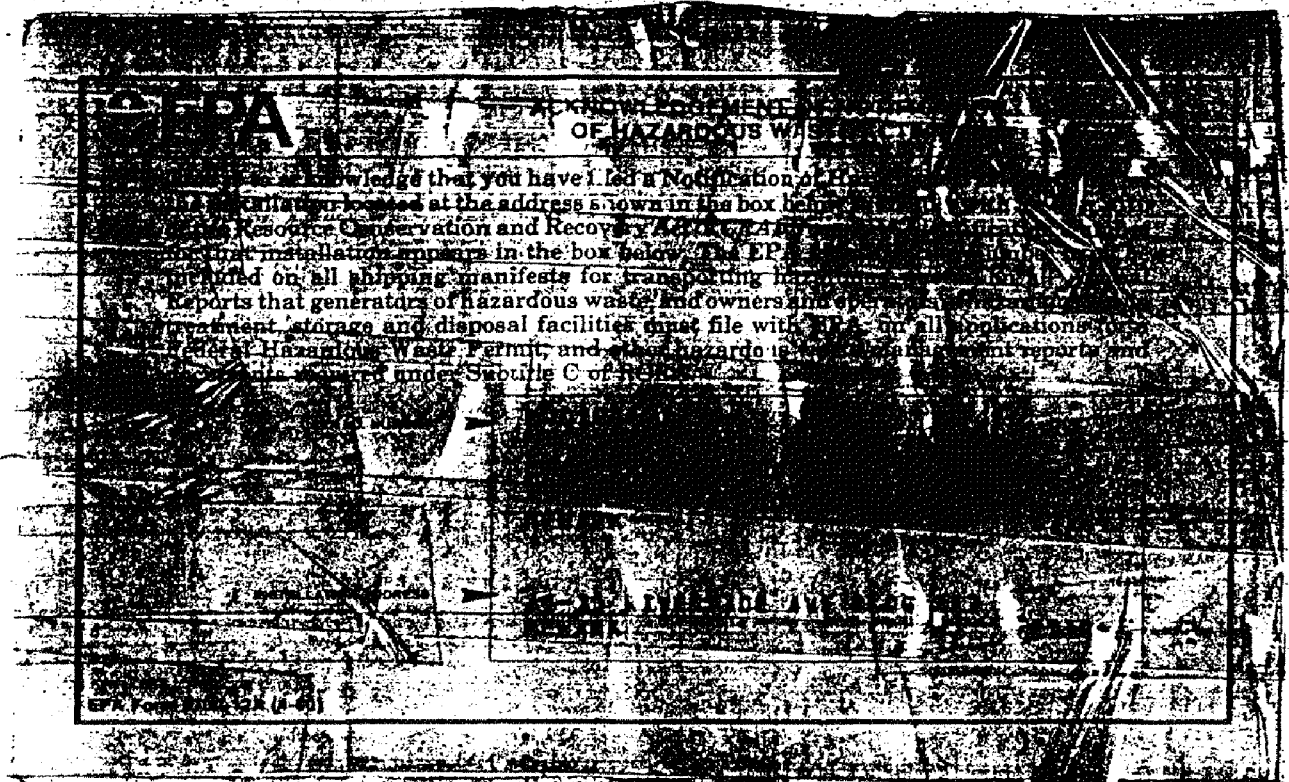
Rev: 02/96

BY:   
EXECUTIVE DIRECTOR

845340034

2

845340035



845340036





**845340037**

**PASSAIC VALLEY SEWERAGE COMMISSIONERS**

**SEWER CONNECTION PERMIT**

**PERMIT #**

20407122

(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.

[Redacted]

(herein, after referred to as the Permittee)  
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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

BY:   
**EXECUTIVE DIRECTOR**

**845340038**



**845340039**

**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 in-house 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) 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) Chloroform (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)

845340040

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)
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

845340041

ACCREDITED LABORATORIES, INC.  
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 3180  
 SAMPLE NUMBER 9508936  
 A FILE 03540  
 CLIENT NAME CCI  
 FIELD ID NDAPA

MATRIX Aqueous  
 DILUTION FACTOR 10  
 DATE EXTRACTED \_\_\_\_\_  
 DATE ANALYZED 06/28/95  
 ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
107028	Acrolein	U	61	78875	1,2-Dichloropropane	U	4.0
107131	Acrylonitrile	U	66	10061015	cis-1,3-Dichloropropane	U	4.0
74873	Chloromethane	550 W	20	79016	Trichloroethene	U	4.0
74839	Bromomethane	300 W	20	71432	Benzene	960 W	4.0
75014	Vinyl Chloride	U	20	124481	Dibromochloromethane	U	4.0
75003	Chloroethane	U	20	79805	1,1,2-Trichloroethane	U	4.0
75092	Methylene Chloride	U	10	10061026	trans-1,3-Dichloropropane	U	4.0
67641	Acetone	24000 W	18	110758	2-Chloroethylvinylether	U	20
75150	Carbon Disulfide	U	4.0	75252	Bromoform	U	4.0
75694	Trichlorofluoromethane	U	4.0	591786	2-Hexanone	110	9.0
75354	1,1-Dichloroethene	U	4.0	108101	4-Methyl-2-pentanone	68	7.0
75343	1,1-Dichloroethane	U	4.0	127184	Tetrachloroethene	U	4.0
156605	trans-1,2-Dichloroethene	U	4.0	79345	1,1,2,2-Tetrachloroethane	U	6.0
67663	Chloroform	31 W	4.0	108883	Toluene	1500 W	5.0
107062	1,2-Dichloroethane	U	4.0	108987	Chlorobenzene	68 W	4.0
78933	2-Butanone	1800	4.0	100414	Ethylbenzene	26	10
71556	1,1,1-Trichloroethane	U	4.0	100425	Styrene	U	4.0
56235	Carbon Tetrachloride	U	4.0	1330287	m,p-Xylene	37 W	28
8054	Vinyl Acetate	U	8.0	95476	o-Xylene	250 W	21
74	Bromodichloromethane	U	4.0	156592	cis-1,2-Dichloroethene	U	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethene-d4	101 %	76-114	OK
Toluene-d8	98 %	80-110	OK
Bromofluorobenzene	97 %	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.

845340042

ACCREDITED LABORATORIES, INC.  
GWA ORGANIC ANALYSIS DATA

CASE NUMBER 3180  
 SAMPLE NUMBER 9508936  
 DATA FILE 181194  
 CLIENT NAME CCI  
 FIELD ID MDAPA

MATRIX Aqueous  
 DILUTION FACTOR 58  
 DATE EXTRACTED 06/28/95  
 DATE ANALYZED 07/22/95  
 ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
108952	Phenol	300 J	500	59507	4-Chloro-3-methylphenol	U	1000
95578	2-Chlorophenol	U	500	88062	2,4,6-Trichlorophenol	U	500
95487	2-Methylphenol	U	500	95954	2,4,5-Trichlorophenol	U	500
108394	3,4-Methylphenol	U	500	51285	2,4-Dinitrophenol	U	2500
88755	2-Nitrophenol	450 J	500	100027	4-Nitrophenol	U	2500
105679	2,4-Dimethylphenol	U	500	534521	4,6-Dinitro-2-methylphenol	U	2500
120832	2,4-Dichlorophenol	U	500	87865	Pentachlorophenol	U	2500
111444	bis(-2-Chloroethyl)Ether	U	500	121142	2,4-Dinitrotoluene	U	500
541731	1,3-Dichlorobenzene	U	500	84662	Diethylphthalate	U	500
186467	1,4-Dichlorobenzene	U	500	7005723	4-Chlorophenyl-phenylether	U	500
100516	Benzyl Alcohol	U	1000	86737	Fluorene	U	500
95501	1,2-Dichlorobenzene	U	500	180016	4-Nitroaniline	U	2500
108601	bis(2-Chloroisopropyl)ether	U	500	86306	N-Nitrosodiphenylamine	U	500
621647	N-Nitroso-Di-n-propylamine	U	500	101953	4-Bromophenyl-phenylether	U	500
67721	Hexachloroethane	U	500	118741	Hexachlorobenzene	U	500
98953	Nitrobenzene	74 JW	500	85018	Phenanthrene	U	500
78591	Isophorone	U	500	120127	Anthracene	U	500
65850	Benzoic Acid	U	2500	84742	Di-n-Butylphthalate	U	500
111911	bis(-2-Chloroethoxy)Methane	U	500	206440	Fluoranthene	U	500
120821	1,2,4-Trichlorobenzene	U	500	129000	Pyrene	U	500
203	Naphthalene	U	500	85687	Butylbenzylphthalate	U	500
106478	4-Chloroaniline	U	1000	91941	3,3'-Dichlorobenzidine	U	1000
87683	Hexachlorobutadiene	U	500	56553	Benzo(a)Anthracene	U	500
91576	2-Methylnaphthalene	U	500	117817	Bis(2-Ethylhexyl)Phthalate	U	500
77474	Hexachlorocyclopentadiene	U	500	218019	Chrysene	U	500
91587	2-Chloronaphthalene	U	500	117840	Di-n-octyl phthalate	U	500
88744	2-Nitroaniline	800 J	2500	205992	Benzo(b)fluoranthene	U	500
131113	Dimethyl Phthalate	U	500	207089	Benzo(k)Fluoranthene	U	500
208968	Acenaphthylene	U	500	50328	Benzo(a)Pyrene	U	500
99092	3-Nitroaniline	870 J	2500	193395	Indeno(1,2,3-cd)Pyrene	U	500
83329	Acenaphthene	U	500	53703	Dibenzo(a,h)Anthracene	U	500
132649	Dibenzofuran	U	500	191242	Benzo(g,h,i)Perylene	U	500
606202	2,6-Dinitrotoluene	U	500	62759	N-Nitrosodimethylamine	U	500

SUBSTITUTE COMPOUNDS	RECOVERY	LIMITS	STATUS
Nitrobenzene-d5	42 %	35-114	OK
2-Fluorobiphenyl	49 %	43-116	OK
Terphenyl-d14	82 %	33-141	OK
Phenol-d5	42 %	10- 94	OK
2-Fluorophenol	34 %	21-100	OK
2,4,6-Tribromophenol	38 %	10-123	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.  
 \* 3-Methylphenol and 4-Methylphenol can not be separated by the method applied

845340043



# 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: PVSC MONITORING  
Lab Case Number: 10950 - 2904

HC BLUE #2

### MDL - METHOD DETECTION LIMIT

< = LESS THAN THE MDL

Lab ID: 2904-001  
Client ID: 001  
Matrix/Units: Aqueous - µg/L  
Percent Moisture: 100

Date Sampled: 12/26/95  
Time Sampled: 15:00  
Date Analyzed: 1/2/96

### VOLATILES Method 624

Compound	Conc.	Q	MDL	Compound	Conc.	Q	MDL
Chloromethane	<	10.0	10.0	Bromodichloromethane	<	10.0	10.0
Vinyl Chloride	<	10.0	10.0	2-Chloroethyl Vinyl Ether	<	10.0	10.0
Bromomethane	<	10.0	10.0	cis-1,3-Dichloropropene	<	10.0	10.0
Chloroethane	<	10.0	10.0	Toluene	<	10.0	10.0
Trichlorofluoromethane	<	10.0	10.0	trans-1,3-Dichloropropene	<	10.0	10.0
1,1-Dichloroethene	<	10.0	10.0	1,1,2-Trichloroethane	<	10.0	10.0
Methylene Chloride	<	20.0	20.0	Tetrachloroethene	<	10.0	10.0
trans-1,2-Dichloroethene	<	10.0	10.0	Dibromochloromethane	<	10.0	10.0
1,1-Dichloroethane	<	10.0	10.0	Chlorobenzene	<	10.0	10.0
Chloroform	18.8		10.0	Ethylbenzene	<	10.0	10.0
1,1,1-Trichloroethane	<	10.0	10.0	Total Xylenes	<	10.0	10.0
Carbon Tetrachloride	<	10.0	10.0	Bromoform	<	10.0	10.0
1,2-Dichloroethane	<	10.0	10.0	1,1,2,2-Tetrachloroethane	<	10.0	10.0
Benzene	<	10.0	10.0	1,3-Dichlorobenzene	<	10.0	10.0
Trichloroethene	<	10.0	10.0	1,4-Dichlorobenzene	<	10.0	10.0
1,2-Dichloropropane	<	10.0	10.0	1,2-Dichlorobenzene	<	10.0	10.0

### TOTAL CYANIDE Method 335.2

Lab ID: 2904-001  
Client ID: 001  
Matrix/Units: Aqueous - mg/L  
Percent Moisture: 100

Date Sampled: 12/26/95  
Time Sampled: 15:00  
Date Analyzed: 1/2/96

Result	MDL
1.00	0.05

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

*Michael H. Lefin*  
Michael H. Lefin, 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

New York Certified Lab # 11402

845340044





# 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

HC-BLUE #2

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### SEMIVOLATILES - BASE NEUTRALS

Method 625

Lab ID : 2903-01

Client ID : 001

Matrix/Units : Aqueous - µg/L

Percent Moisture: 100

Date Sampled : 12/26/95

Time Sampled : 15:00

Date Analyzed : 1/11/96

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-phenylether	< 100		100
1,3-Dichlorobenzene	< 100		100	4-Nitroaniline	< 100		100
1,4-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100		100
benzyl alcohol	< 100		100	1,2-Diphenylhydrazine/Azobenzene	< 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
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-Trichlorobenzene	< 100		100	Benzidine	< 100		100
Naphthalene	< 100		100	Pyrene	< 100		100
4-Chloroaniline	< 100		100	3,3'-Dimethylbenzidine	< 100		100
Hexachlorobutadiene	< 100		100	Butylbenzylphthalate	< 100		100
2-Methylnaphthalene	< 100		100	3,3'-Dichlorobenzidine	< 100		100
Hexachlorocyclopentadiene	< 100		100	Benzo[a]anthracene	< 100		100
2-Chloronaphthalene	< 100		100	Chrysene	< 100		100
2-Nitroaniline	< 100		100	bis(2-Ethylhexyl)phthalate	< 100		100
Dimethylphthalate	< 100		100	Di-n-octylphthalate	< 100		100
2,6-Dinitrotoluene	< 100		100	Benzo[b]fluoranthene	< 100		100
Acenaphthylene	< 100		100	Benzo[k]fluoranthene	< 100		100
3-Nitroaniline	< 100		100	Benzo[a]pyrene	< 100		100
Acenaphthene	< 100		100	Indeno[1,2,3-cd]pyrene	< 100		100
2,4-Dinitrotoluene	< 100		100	Dibenz[a,h]anthracene	< 100		100
Dibenzofuran	< 100		100	Benzo[g,h,i]perylene	< 100		100

= Qualifier

845340045

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# 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 : PVSC - MONITORING  
Lab Case Number : 10950 - 2903

*HC B10E #2*

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### SEMIVOLATILES - ACIDS Method 625

Lab ID : 2903-01  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture : 100

Date Sampled : 12/26/95  
Time Sampled : 15:00  
Date Analyzed : 1/11/96

Compound	Result	Q	MDL
Phenol	< 100		
2-Chlorophenol	< 100		100
2-Methylphenol	< 100		100
3-Methylphenol	< 100		100
Nitrophenol	< 100		100
2,4-Dimethylphenol	< 100		100
Benzoic acid	20400		100
2,4-Dichlorophenol	< 100		1000
4-Chloro-3-methylphenol	< 100		100
2,4,6-Trichlorophenol	< 100		100
2,4,5-Trichlorophenol	< 100		100
2,4-Dinitrophenol	< 100		100
4-Nitrophenol	< 100		100
4,6-Dinitro-2-methylphenol	< 100		100
Pentachlorophenol	< 100		100

### METALS EPA Series 200

Lab ID : 2903-01  
Client ID : 001  
Matrix/Units : Aqueous - mg/L  
Percent Moisture : 100

Date Sampled : 12/26/95  
Time Sampled : 15:00  
Date Analyzed : 1/11/96

Compound	Result	Q	MDL
Lead	< 0.04		0.04
Zinc	0.22		0.02

Q = Qualifier

845340046

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 989-5288

*fc 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

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### GENERAL ANALYTICAL

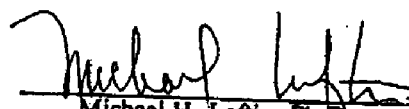
Lab ID : 2903-01  
Client ID : 001  
Matrix/Units : Aqueous - mg/L  
Percent Moisture: 100

Date Sampled : 12/26/95  
Time Sampled : 15:00

Compound (Method)	Result	Q	MDL	Date Analyzed
Biochemical Oxygen Demand (405.1)	18600		NA	1/2/96
Total Suspended Solids (160.2)	< 10.0		10.0	1/3/96

Q = Qualifier

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.

845340047

New Jersey Certified Lab# 14751

New York Certified Lab # 11402

ACCREDITED LABORATORIES, INC.  
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 2616  
SAMPLE NUMBER 9506616  
DATA FILE >09873  
CLIENT NAME CCI  
FIELD ID MWFA

MATRIX Aqueous  
DILUTION FACTOR 1.0  
DATE EXTRACTED \_\_\_\_\_  
DATE ANALYZED 05/24/95  
ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
107028	Acrolein	U	6.1	78875	1,2-Dichloropropane	U	.4
107131	Acrylonitrile	U	6.6	10061015	cis-1,3-Dichloropropene	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	U	.4
75092	Methylene Chloride	U	1.0	10061026	trans-1,3-Dichloropropene	U	.4
67641	Acetone	U	1.8	110758	2-Chloroethylvinylether	U	2.0
75150	Carbon Disulfide	U	.4	75252	Bromoform	U	.4
75694	Trichlorofluoromethane	U	.4	591786	2-Hexanone	U	.9
75354	1,1-Dichloroethane	U	.4	108101	4-Methyl-2-pentanone	U	.7
75343	1,1-Dichloroethane	U	.4	127184	Tetrachloroethane	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-Dichloroethane	U	.4	108907	Chlorobenzene	U	.4
78933	2-Butanone	U	.4	100414	Ethylbenzene	U	1.0
71556	1,1,1-Trichloroethane	U	.4	100425	Styrene	U	.4
56235	Carbon Tetrachloride	U	.4	1330207	m,p-Xylene	U	2.8
108054	Vinyl Acetate	U	.8	95476	o-Xylene	U	2.1
75274	Bromodichloromethane	U	.4	156592	cis-1,2-Dichloroethene	U	.4

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	102 %	76-114	OK
Toluene-d8	101 %	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.

845340048

ACCREDITED LABORATORIES, INC.  
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 7616  
 SAMPLE NUMBER 9506616  
 DATA FILE 7F1694  
 CLIENT NAME CCI  
 FIELD ID MMFA

MATRIX Aqueous  
 DILUTION FACTOR 5  
 DATE EXTRACTED 05/15/95  
 DATE ANALYZED 05/25/95  
 ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
108952	Phenol	U	50	95954	2,4,5-Trichlorophenol	U	250
95978	2-Chlorophenol	U	50	51285	2,4-Dinitrophenol	U	250
95487	2-Methylphenol	U	50	100027	4-Nitrophenol	U	250
108394	3&4-Methylphenol	U	50	534921	4,6-Dinitro-2-methylphenol	U	250
82755	2-Nitrophenol	600	50	87865	Pentachlorophenol	U	250
109679	2,4-Dimethylphenol	U	50	121142	2,4-Dinitrotoluene	U	50
120832	2,4-Dichlorophenol	U	50	94662	Diethylphthalate	U	50
111444	bis(2-Chloroethyl)Ether	U	50	7005723	4-Chlorophenyl-phenylether	U	50
941231	1,3-Dichlorobenzene	U	50	86737	Fluorene	U	50
106467	1,4-Dichlorobenzene	U	50	100016	4-Nitroaniline	U	250
100816	Benzyl Alcohol	U	50	86506	N-Nitrosodiphenylamine	U	50
95901	1,2-Dichlorobenzene	U	50	101953	4-Bromophenyl-phenylether	U	50
108091	bis(2-Chloroisopropyl)Ether	U	50	116741	Hexachlorocyclopentadiene	U	50
111647	N-Nitroso-Di-n-propylamine	U	50	95918	Phenanthrene	U	50
97101	Hexachloroethane	U	50	120127	Anthracene	U	50
95953	Nitrobenzene	U	50	84742	Di-n-Butylphthalate	U	50
95991	Isophorone	U	50	206440	Fluoranthene	U	50
95950	Benzoic Acid	U	250	129000	Pyrene	U	50
111911	bis(2-Chloroethoxy)Methane	U	50	85687	Butylbenzylphthalate	U	50
120821	1,2,4-Trichlorobenzene	U	50	91941	3,3'-Dichlorobenzidine	U	100
91203	Naphthalene	U	50	95953	Benzofluoranthene	U	50
106478	4-Chloroaniline	U	50	117817	Sis(2-Ethylhexyl)Phthalate	U	50
97683	Hexachlorobutadiene	U	50	218019	Chrysene	U	50
91576	2-Methylnaphthalene	U	50	117840	Di-n-octyl phthalate	U	50
97474	Hexachlorocyclopentadiene	U	50	295992	Benzo(b)Fluoranthene	U	50
91587	2-Chloronaphthalene	U	50	207089	Benzok(f)Fluoranthene	U	50
98744	2-Nitroaniline	U	250	90328	Benzofluoranthene	U	50
101113	Dimethyl Phthalate	U	50	191395	Indeno(1,2,3-cd)Pyrene	U	50
108968	Acenaphthylene	U	50	53703	Dibenzo(a,h)Anthracene	U	50
95092	5-Nitroaniline	U	250	191142	Benzo(g,h,i)Perylene	U	50
93329	Acenaphthene	U	50	62759	N-Nitrosodimethylamine	U	50
102649	Dibenzofuran	U	50	237329	2,4-Dinitrochlorobenzene	U	2500
606202	2,6-Dinitrotoluene	U	50	229715	2,5-Dinitrophenol	U	2500
95987	4-Chloro-3-methylphenol	U	50	38891	2,4,6-Trinitrophenol	U	2500
98961	2,4,6-Trichlorophenol	U	50				

SUBSTANCE	RECOVERY	LIMITS	STATUS
Nitrobenzene- <i>o</i>	52 %	35-114	OK
2-Fluorobiphenyl	70 %	43-116	OK
Terphenyl- <i>d</i> 14	68% %	33-141	OUT
Phenol- <i>o</i>	43 %	10- 94	OK
2-Fluorophenol	31 %	21-100	OK
2,4,6-Tribromophenol	16 %	10-123	OK

U - Indicates compound concentration found below MDL.  
 D - 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.  
 \*\* 3-Methylphenol and 4-Methylphenol can not be separated by the method applied

845340049

INDUSTRIAL CORROSION MANAGEMENT, Inc.

1152 Route 10  
Randolph, NJ 07869  
201-584-0330  
OCTOBER 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:	MATRIX	LAB NUMBER	DATE & TIME COLLECTED	AT LAB DATE
NPD ML's	Aqueous	220698	09/21/95 08:30	09/22/95

Supervisor/Manager Signature:

*Richard S. Levine (mc)*  
Richard S. Levine

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845340050

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 ACID FRACTION ANALYSIS BY GC/MS

Lab Number: 220698 Data File: >I7063  
 Client: CHEMICAL COMPOUNDS, INC.  
 Sample source: Waste water  
 Sample ID: NPE ML's  
 Sample date: 09/21/95 Extracted Date: 09/26/95  
 Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5  
 At lab date: 09/22/95 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	U	U	200
2-Nitrophenol	U	U	200
Phenol	U	U	200
2,4-Dimethylphenol	U	U	360
2,4-Dichlorophenol	U	U	200
2,4,6-Trichlorophenol	U	U	200
Pentachlorophenol	U	U	200
2,4-Dinitrophenol	U	U	200
1,6-Dinitro-2-methylphenol	U	U	720
1-Nitrophenol	U	U	200
1-Chloro-3-methylphenol	U	U	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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 MEG

②

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: 220698 Data File: >I7063  
 Client: CHEMICAL COMPOUNDS, INC.  
 Sample source: Waste water  
 Sample ID: NED ML's  
 Sample date: 09/21/95 Extracted Date: 09/26/95  
 Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5  
 At lab date: 09/22/95 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
N-Nitrosodimethylamine	U	U	200
bis(2-Chloroethyl) ether	U	U	200
1,3-Dichlorobenzene	U	U	480
1,4-Dichlorobenzene	U	U	460
1,2-Dichlorobenzene	U	U	480
bis(2-Chloroisopropyl) ether	U	U	240
N-Nitroso-di-n-propylamine	U	U	360
Hexachloroethane	U	U	580
Nitrobenzene	U	U	200
Isophorone	U	U	200
bis(2-Chloroethoxy)methane	U	U	200
1,2,4-Trichlorobenzene	U	U	460
Naphthalene	U	U	400
Hexachlorobutadiene	U	U	200
hexachlorocyclopentadiene	U	U	300
peroronaphthalene	U	U	400
Dimethyl phthalate	U	U	920
Acenaphthylene	U	U	300
2,6-Dinitrotoluene	U	U	200
Acenaphthene	U	U	380
2,4-Dinitrotoluene	U	U	200
Diethyl phthalate	U	U	460
4-Chlorophenyl phenyl ether	U	U	400
Fluorene	U	U	340
N-Nitrosodiphenylamine	U	U	200
1,2-Diphenylhydrazine (Azobenzene)	U	U	200
4-Bromophenyl phenyl ether	U	U	380
Hexachlorobenzene	U	U	380
Phenanthrene	U	U	180
Anthracene	U	U	160
Di-n-butylphthalate	U	U	500
Fluoranthene	U	U	120
Benidine	U	U	200
Pyrene	U	U	100
Butyl benzylphthalate	U	U	240
3,3'-Dichlorobenzidine	U	U	200
Benzo(a)anthracene	U	U	100
Chrysene	U	U	100
bis(2-Ethylhexyl)phthalate	U	U	600
Di-n-octylphthalate	U	U	200
Benzo(b)fluoranthene	U	U	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.
- IND: Indeterminable

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 MRRG



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: 220698 Data File: >I7063  
 Client: CHEMICAL COMPOUNDS, INC.  
 Sample source: Waste water  
 Sample ID: NPD ML's  
 Sample date: 09/21/95 Extracted Date: 09/26/95  
 Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5  
 At lab date: 09/22/95 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
Benzo(k)fluoranthene	U	U	140
Benzo(a)pyrene	U	U	100
Indeno(1,2,3-cd)pyrene	U	U	220
Dibenz(a,h)anthracene	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.
- IND: Indeterminable

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# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 889-5288

## 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 LIMIT** < - LESS THAN THE MDL

VOLATILES

Lab ID: 2640-01  
Client ID: 001  
Matrix/Units: Aqueous - µg/L  
Percent Moisture: 100

Date Sampled: 11/17/95  
Time Sampled: 11:30  
Date Analyzed: 11/28/95

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-Dichloropropene	< 50	50
Chloroethane	< 50	50	Toluene	< 50	50
Trichlorofluoromethane	< 50	50	trans-1,3-Dichloropropene	< 50	50
1,1-Dichloroethane	< 50	50	1,1,2-Trichloroethane	< 50	50
Methylene chloride	< 100	100	Tetrachloroethane	< 50	50
trans-1,2-Dichloroethane	< 50	50	Dibromochloromethane	< 50	50
1,1-Dichloroethane	< 50	50	Chlorobenzene *	2810	50
Chloroform	< 50	50	Ethylbenzene	< 50	50
1,1,1-Trichloroethane	< 50	50	Xylenes, total	49100	2000
Carbon tetrachloride	< 50	50	Bromoform	< 50	50
1,2-Dichloroethane	< 50	50	1,1,2,2-Tetrachloroethane	< 50	50
Benzene	< 50	50	1,3-Dichlorobenzene	< 50	50
Trichloroethene	< 50	50	1,4-Dichlorobenzene	< 50	50
1,2-Dichloropropane	< 50	50	1,2-Dichlorobenzene	169	50

\*Result from diluted Sample Analysis.

Continued on next page.

YELLOW #2 "PURE"

845340054

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# 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: INTERNAL MONITORING

Lab Case Number: 10950 - 2640

MDL = METHOD DETECTION LIMIT

< - LESS THAN THE MDL

### SEMIVOLATILES (BNA)

Lab ID: 2640-01 -

Client ID: 001

Matrix/Units: Aqueous - µg/L

Percent Moisture: 100

Date Sampled: 11/17/95

Time Sampled: 11:30

Date Analyzed: 11/28/95

Compound	Conc.	MDL	Compound	Conc.	MDL
3-Nitroaniline	< 100	100	Carbazole	< 100	100
Acenaphthene	< 100	100	Di-n-butylphthalate	< 100	100
2,4-Dinitrophenol	< 100	100	Fluoranthene	< 100	100
4-Nitrophenol	< 100	100	Benazidine	< 100	100
2,4-Dinitrotoluene	< 100	100	Pyrene	< 100	100
Dibenzofuran	< 100	100	3,3'-Dimethylbenzidine	< 100	100
Diethylphthalate	< 100	100	Butylbenzylphthalate	< 100	100
Fluorene	< 100	100	3,3'-Dichlorobenzidine	< 100	100
4-Chlorophenyl-phenylether	< 100	100	Benzo[a]anthracene	< 100	100
4-Nitroaniline	< 100	100	Chrysene	< 100	100
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
Hexachlorobenzene	< 100	100	Benzo[a]pyrene	< 100	100
Pentachlorophenol	< 100	100	Indeno[1,2,3-cd]pyrene	< 100	100
Phenanthrene	< 100	100	Dibenz[a,h]anthracene	< 100	100
Anthracene	< 100	100	Benzo[g,h,i]perylene	< 100	100

YELLOW #2 "PURE"

845340055

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07889

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 - 2640

**MDL - METHOD DETECTION LIMIT**

**< - LESS THAN THE MDL**

**SEMIVOLATILES (BNA)**

Lab ID: 2640-01  
Client ID: 001  
Matrix/Units: Aqueous - µg/L  
Percent Moisture: 100

Date Sampled: 11/17/95  
Time Sampled: 11:30  
Date Analyzed: 11/28/95

Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 100	100 bis(2-Chloroethoxy)methane	< 100	100
Phenol	< 100	100 Benzoic acid	< 500	500
Aniline	< 100	100 2,4-Dimethylaniline	< 100	100
bis(2-Chloroethyl)ether	< 100	100 2,4-Dichlorophenol	< 100	100
2-Chlorophenol	496	100 1,2,4-Trichlorobenzene	< 100	100
1,3-Dichlorobenzene	< 100	100 Naphthalene	< 100	100
1,4-Dichlorobenzene	< 100	100 4-Chloroaniline	< 100	100
Benzyl alcohol	< 100	100 Hexachlorobutadiene	< 100	100
1,2-Dichlorobenzene	< 100	100 4-Chloro-3-methylphenol	< 100	100
2-Methylphenol	< 100	100 2-Methylnaphthalene	< 100	100
bis(2-chloroisopropyl)ether	< 100	100 Hexachlorocyclopentadiene	< 100	100
4-Methylphenol	< 100	100 2,4,6-Trichlorophenol	< 100	100
N-Nitroso-di-n-propylamine	< 100	100 2,4,5-Trichlorophenol	< 100	100
2-Aminotoluene + 4-Aminotoluene	< 100	100 2-Chloronaphthalene	< 100	100
Hexachloroethane	< 100	100 2-Nitroaniline	5510	100
Nitrobenzene	259	100 Dimethylphthalate	< 100	100
Isochloro	< 100	100 2,6-Dinitrotoluene	< 100	100
2-Nitrophenol	3380	100 Acenaphthylene	< 100	100
2,4-Dimethylphenol	< 100	100		

Continued on next page.

Yellow #2 "PURE"

845340056

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07868

201 361-4252  
Fax: 201 989-5288

*YELLOW #4*

## ANALYTICAL DATA REPORT

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

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

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### VOLATILES Method 624

Lab ID : 2639-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture: 100

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/28/95

Compound	Conc.	Q	MDL	Compound	Conc.	Q	MDL
Chloroethane	< 50		50	Bromodichloromethane	< 50		50
Vinyl Chloride	< 50		50	2-Chloroethyl Vinyl Ether	< 50		50
Bromomethane	< 50		50	cis-1,3-Dichloropropene	< 50		50
Chloroethane	< 50		50	Toluene	< 50		50
Trichlorofluoromethane	< 50		50	trans-1,3-Dichloropropene	< 50		50
1,1-Dichloroethane	< 50		50	1,1,2-Trichloroethane	< 50		50
Methylene Chloride	< 100		100	Tetrachloroethane	< 50		50
trans-1,2-Dichloroethane	< 50		50	Dibromochloromethane	< 50		50
1,1-Dichloroethane	< 50		50	Chlorobenzene	< 50		50
Chloroform	53.1	2-b	50	Ethylbenzene	< 50		50
1,1,1-Trichloroethane	< 50	111	50	Total Xylenes	260		50
Carbon Tetrachloride	< 50		50	Bromoform	< 50		50
1,2-Dichloroethane -	7200*		200	1,1,2,2-Tetrachloroethane	< 50		50
Benzene	< 50		50	1,3-Dichlorobenzene	< 50		50
Trichloroethane	< 50		50	1,4-Dichlorobenzene	< 50		50
1,2-Dichloropropane	< 50		50	1,2-Dichlorobenzene	< 50		50

\* Results from diluted sample analysis.

### TOTAL CYANIDE Method 335.2

Lab ID : 2639-001  
Client ID : 001  
Matrix/Units : Aqueous - mg/L  
Percent Moisture: 100

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/28/95

Result	MDL
< 0.05	0.05

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

*Michael H. Lefini*  
Michael H. Lefini, 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

New York Certified Lab # 11402

845340057



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 889-5288

## ANALYTICAL DATA REPORT

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

*HC Yellow #4*

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

### MDL - METHOD DETECTION LIMIT

### SEMIVOLATILES - ACIDS Method 625

< = LESS THAN THE MDL

Lab ID : 2638-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture : 100 -

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/28/95

Compound	Result	Q	MDL
Phenol	< 100		100
2-Chlorophenol	< 100		100
2-Methylphenol	< 100		100
4-Methylphenol	< 100		100
2-Nitrophenol	< 100		100
2,4-Dimethylphenol	< 100		100
Benzoic acid	< 500		100
2,4-Dichlorophenol	< 100		500
4-Chloro-3-methylphenol	< 100		100
2,4,6-Trichlorophenol	< 100		100
2,4,5-Trichlorophenol	< 100		100
2,4-Dinitrophenol	< 100		100
4-Nitrophenol	< 100		100
4,6-Dinitro-2-methylphenol	< 100		100
Pentachlorophenol	< 100		100

### METALS EPA Series 200

Lab ID : 2638-001  
Client ID : 001  
Matrix/Units : Aqueous - mg/L  
Percent Moisture : 100

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/22/95

Compound	Result	Q	MDL
Lead	0.15		0.04
Zinc	0.53		0.02

Q = Qualifier

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

*Michael H. Leftin*  
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

New York Certified Lab # 11402

845340058



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 988-5288

## ANALYTICAL DATA REPORT

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

*HC Yellow #4*

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

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### SEMIVOLATILES - BASE NEUTRALS

Method 625

Lab ID : 2638-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture: 100

Date Sampled : 11/17/95  
Time Sampled : 11:50  
Date Analyzed : 11/28/95

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	*47600		400	4-Chlorophenyl-phenylether	< 100		100
1,3-Dichlorobenzene	< 100		100	4-Nitroaniline	< 100		100
1,4-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100		100
Benzyl alcohol	< 100		100	1,2-Diphenylhydrazine/Azobenzene	< 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
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-Trichlorobenzene	< 100		100	Benazidine	< 100		100
Naphthalene	< 100		100	Pyrene	< 100		100
4-Chloroaniline	< 100		100	3,3'-Dimethylbenzidine	< 100		100
Hexachlorobutadiene	< 100		100	Butylbenzylphthalate	< 100		100
2-Methylnaphthalene	< 100		100	3,3'-Dichlorobenzidine	< 100		100
Hexachlorocyclopentadiene	< 100		100	Benzo(a)anthracene	< 100		100
2-Chloronaphthalene	< 100		100	Chrysene	< 100		100
2-Nitroaniline	< 100		100	bis(2-Ethylhexyl)phthalate	107		100
Dimethylphthalate	< 100		100	Di-n-octylphthalate	< 100		100
2,6-Dinitrotoluene	< 100		100	Benzo(b)fluoranthene	< 100		100
Acenaphthylene	< 100		100	Benzo(k)fluoranthene	< 100		100
3-Nitroaniline	< 100		100	Benzo(a)pyrene	< 100		100
Acenaphthene	< 100		100	Indeno[1,2,3-cd]pyrene	< 100		100
2,4-Dinitrotoluene	< 100		100	Dibenzo(a,h)anthracene	< 100		100
Dibenzofuran	< 100		100	Benzo(g,h,i)perylene	< 100		100

Q = Qualifier

\* = Result from diluted analysis.

Continued on the next page.

New Jersey Certified Lab# 14751

New York Certified Lab # 11482

845340059



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 989-5288

## 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 LIMIT

< = LESS THAN THE MDL

### VOLATILES

Lab ID: 1719-002  
Client ID: 002  
Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

Compound	Conc.	MDL	Compound	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
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	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

### TENTATIVELY IDENTIFIED COMPOUNDS

Lab ID: 1719-002  
Client ID: 002  
Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

CAS#	COMPOUND	ESTIMATED CONCENTRATION	RETENTION TIME
	Unknown	146000	5.82

Continued on next page.

845340060

New Jersey Certified Lab# 14751.

New York Certified Lab # 11402





# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 989-5288

## 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 LIMIT

< = LESS THAN THE MDL

### BASE NEUTRALS ACIDS

Lab ID: 1719-002

Client ID: 002

Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 160.0	160.0 bis(2-Chloroethoxy)methane	< 160.0	160.0
Phenol	< 160.0	160.0 Benzoic acid	< 800.0	800.0
Aniline	< 160.0	160.0 2,4-Dimethylaniline	< 160.0	160.0
bis(2-Chloroethyl)ether	< 160.0	160.0 2,4-Dichlorophenol	< 160.0	160.0
2-Chlorophenol	< 160.0	160.0 1,2,4-Trichlorobenzene	< 160.0	160.0
1,3-Dichlorobenzene	< 160.0	160.0 Naphthalene	< 160.0	160.0
1,4-Dichlorobenzene	< 160.0	160.0 4-Chloroaniline	< 160.0	160.0
Benzyl alcohol	< 160.0	160.0 Hexachlorobutadiene	< 160.0	160.0
1,2-Dichlorobenzene	< 160.0	160.0 4-Chloro-3-methylphenol	< 160.0	160.0
2-Methylphenol	< 160.0	160.0 2-Methylnaphthalene	< 160.0	160.0
bis(2-chloroisopropyl)ether	< 160.0	160.0 Hexachlorocyclopentadiene	< 160.0	160.0
4-Methylphenol	< 160.0	160.0 2,4,6-Trichlorophenol	< 160.0	160.0
N-Nitroso-di-n-propylamine	< 160.0	160.0 2,4,5-Trichlorophenol	< 160.0	160.0
2-Aminotoluene +4-Aminotoluene	< 160.0	160.0 2-Chloronaphthalene	< 160.0	160.0
Hexachloroethane	< 160.0	160.0 2-Nitroaniline	< 160.0	160.0
Nitrobenzene	< 160.0	160.0 Dimethylphthalate	< 160.0	160.0
Isophorone	< 160.0	160.0 2,6-Dinitrotoluene	< 160.0	160.0
2-Nitrophenol	< 160.0	160.0 Acenaphthylene	< 160.0	160.0
2,4-Dimethylphenol	< 160.0	160.0		

Continued on next page.

845340061

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# 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

DNHA #13

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

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### BASE NEUTRALS ACIDS

Lab ID: 1719-002

Client ID: 002

Matrix/Units: Aqueous - µg/L

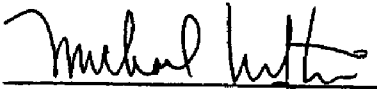
Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

Compound	Conc.	MDL	Compound	Conc.	MDL
3-Nitroaniline	< 160.0	160.0	Carbazole	< 160.0	160.0
Acenaphthene	< 160.0	160.0	Di-n-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-Nitroaniline	< 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
Hexachlorobenzene	< 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,b]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.

845340062

New Jersey Certified Lab#-14751

New York Certified Lab # 11402



# 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

YELLOW #5 Ba# 13

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

Lab ID: 1719-001  
Client ID: 001  
Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

VOLATILES					
Compound	Conc.	MDL	Compound	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
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	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

## TENTATIVELY IDENTIFIED COMPOUNDS

Lab ID: 1719-001  
Client ID: 001  
Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

CAS#	COMPOUND	ESTIMATED CONCENTRATION	RETENTION TIME
	Unknown	158000	5.76

Continued on next page.

845340063

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# 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

YELLOW 5, #13

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### BASE NEUTRALS ACIDS

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - µg/L

Date Sampled : 8/9/95

Time Sampled : 11:00

Date Analyzed : 8/15/95

Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 40.0	40.0 bis(2-Chloroethoxy)methane	< 40.0	40.0
Phenol	< 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-Chlorophenol	< 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
1,2-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
bis(2-chloroisopropyl)ether	< 40.0	40.0 Hexachlorocyclopentadiene	< 40.0	40.0
4-Methylphenol	< 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
Isophorone	< 40.0	40.0 2,6-Dinitrotoluene	< 40.0	40.0
2-Nitrophenol	< 40.0	40.0 Acenaphthylene	< 40.0	40.0
2,4-Dimethylphenol	< 40.0	40.0		

Continued on next page.

845340064

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 889-5288

## ANALYTICAL DATA REPORT

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

*Yellow #15, Ba #13*

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### BASE NEUTRALS ACIDS

Lab ID: 1719-001  
Client ID: 001  
Matrix/Units: Aqueous - µg/L

Date Sampled : 8/9/95  
Time Sampled : 11:00  
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 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.

845340065

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# 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: Internal Monitoring  
Lab Case Number : 10950 - 1439

NOPD

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### VOLATILES - (601/602)

Lab ID : 1439-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

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

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	Chlorobenzene	< 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 - µg/L

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. Leftini, 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

New York Certified Lab # 11402

845340066



# 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 - 1438

*NOPD*

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

Lab ID : 1438- 001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

Date Sampled : 7/7/95  
Time Sampled : 14:00  
Date Analyzed : 7/15/95

### BASE NEUTRALS

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-Dichlorobenzene	< 50.0	50.0	N-Nitrosodiphenylamine	< 50.0	50.0
Benzyl alcohol	< 50.0	50.0	1,2-Diphenylhydrazine/Azobenzene	< 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-Chloronaphthalene	< 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*  
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

New York Certified Lab # 11402

845340067



# 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 - 1438

NOPD

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### ACIDS

Lab ID : 1438- 001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

Date Sampled : 7/7/95  
Time Sampled : 14:00  
Date Analyzed : 7/18/95

Compound	Result	Q	MDL
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-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/Corrosivity

Lab ID : 1438- 001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

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

Michael H. Leftin, Ph.D.  
Laboratory Director

845340068

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

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



ACCREDITED LABORATORIES, INC.  
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 2713  
 SAMPLE NUMBER 9502011  
 TA FILE TA3114  
 CLIENT NAME CCI  
 FIELD ID RED43

MATRIX AQUEOUS  
 DILUTION FACTOR 10  
 DATE EXTRACTED \_\_\_\_\_  
 DATE ANALYZED 06/02/95  
 ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
107028	Acrolein	U	61	78879	1,2-Dichloropropane	U	4.0
107131	Acrylonitrile	U	66	10061815	cis-1,3-Dichloropropene	U	4.0
74873	Chloromethane	U	20	79816	Trichloroethene	U	4.0
74839	Bromomethane	U	20	71432	Benzene	U	4.0
75014	Vinyl Chloride	U	20	124481	Dibromochloromethane	U	4.0
75003	Chloroethane	U	20	79005	1,1,2-Trichloroethane	U	4.0
75092	Methylene Chloride	32 W	10	10061026	trans-1,3-Dichloropropene	U	4.0
67641	Acetone	U	18	118758	2-Chloroethylvinylether	U	20
75150	Carbon Disulfide	U	4.0	75252	Bromoform	U	4.0
75694	Trichlorofluoromethane	U	4.0	591786	2-Hexanone	U	9.0
75354	1,1-Dichloroethene	U	4.0	108101	4-Methyl-2-pentanone	U	7.0
75343	1,1-Dichloroethane	U	4.0	127184	Tetrachloroethene	U	4.0
156605	trans-1,2-Dichloroethene	U	4.0	79345	1,1,2,2-Tetrachloroethane	U	6.0
67663	Chloroform	41 W	4.0	108883	Toluene	17	5.0
107062	1,2-Dichloroethane	50 W	4.0	108907	Chlorobenzene	U	4.0
78933	2-Butanone	54	4.0	100414	Ethylbenzene	U	10
71556	1,1,1-Trichloroethane	U	4.0	100425	Styrene	U	4.0
135	Carbon Tetrachloride	U	4.0	1330207	m,p-Xylene	35	28
1094	Vinyl Acetate	U	8.0	95476	o-Xylene	U	21
14	Bromodichloromethane	31 W	4.0	156592	cis-1,2-Dichloroethene	U	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	101 %	76-114	OK
Toluene-d8	100 %	88-110	OK
Bromofluorobenzene	96 %	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.

845340069

ACCREDITED LABORATORIES, INC.  
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 2213  
SAMPLE NUMBER 9507011  
DATA FILE 9F1825  
CLIENT NAME CCI  
FIELD ID BEO#3

MATRIX Aqueous  
DILUTION FACTOR 5  
DATE EXTRACTED 05/24/95  
DATE ANALYZED 06/02/95  
ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
108952	Phenol	U	50	59507	4-Chloro-3-methylphenol	U	50
95578	2-Chlorophenol	U	50	88062	2,4,6-Trichlorophenol	U	50
95487	2-Methylphenol	U	50	95954	2,4,5-Trichlorophenol	U	250
108394	3&4-Methylphenol	U	50	51285	2,4-Dinitrophenol	U	250
88755	2-Nitrophenol	U	50	100827	4-Nitrophenol	U	250
105679	2,4-Dimethylphenol	U	50	534521	4,6-Dinitro-2-methylphenol	U	250
120832	2,4-Dichlorophenol	U	50	87865	Pentachlorophenol	U	250
111444	bis(2-Chloroethyl)Ether	U	50	121142	2,4-Dinitrotoluene	U	50
541731	1,3-Dichlorobenzene	U	50	84662	Diethylphthalate	U	50
106467	1,4-Dichlorobenzene	U	50	7005723	4-Chlorophenyl-phenylether	U	50
108516	Benzyl Alcohol	U	50	86737	Fluorene	U	50
95501	1,2-Dichlorobenzene	U	50	100016	4-Nitroaniline	U	250
108601	bis(2-Chloroisopropyl)ether	U	50	86306	N-Nitrosodiphenylamine	U	50
621647	N-Nitroso-Di-n-propylamine	U	50	101553	4-Bromophenyl-phenylether	U	50
67721	Hexachloroethane	U	50	118741	Hexachlorobenzene	U	50
98953	Nitrobenzene	U	50	85018	Phenanthrene	U	50
78591	Isophorone	U	50	120127	Anthracene	U	50
58850	Benzoic Acid	U	250	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	Naphthalene	U	50	85687	Butylbenzylphthalate	U	50
106478	4-Chloroaniline	U	50	91941	3,3'-Dichlorobenzidine	U	100
87683	Hexachlorobutadiene	U	50	56953	Benzo(a)Anthracene	U	50
91576	2-Methylnaphthalene	U	50	117817	Bis(2-Ethylhexyl)Phthalate	U	50
77474	Hexachlorocyclopentadiene	U	50	218019	Chrysene	U	50
91587	2-Chloronaphthalene	U	50	117840	Di-n-octyl phthalate	U	50
88744	2-Nitroaniline	100 J	250	205992	Benzo(b)fluoranthene	U	50
131113	Dimethyl Phthalate	U	50	207089	Benzo(k)Fluoranthene	U	50
288968	Acenaphthylene	U	50	50328	Benzo(a)Pyrene	U	50
99092	3-Nitroaniline	U	250	193395	Indeno(1,2,3-cd)Pyrene	U	50
83329	Acenaphthene	U	50	53783	Dibenzo(a,h)Anthracene	U	50
132649	Dibenzofuran	U	50	191242	Benzo(g,h,i)Perylene	U	50
646202	2,6-Dinitrotoluene	U	50	62759	N-Nitrosodimethylamine	U	50

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
Nitrobenzene-d5	59 %	35-114	OK
2-Fluorobiphenyl	81 %	43-116	UK
Terphenyl-d14	21 %	33-141	OUT
Phenol-d5	24 %	18- 94	OK
2-Fluorophenol	122 %	21-100	OUT
2,4,6-Tribromophenol	***** NOT DETECTED *****		

J - Indicates compound concentration found below MDL.  
! - 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.  
\*\* 3-Methylphenol and 4-Methylphenol can not be separated by the method applied

845340070

ACCREDITED LABORATORIES, INC.  
GENERAL CHEMISTRY ANALYSIS DATA

Case #: 2713  
Sample #: 9507011  
Client Name: CGI  
Field Number: RED/3

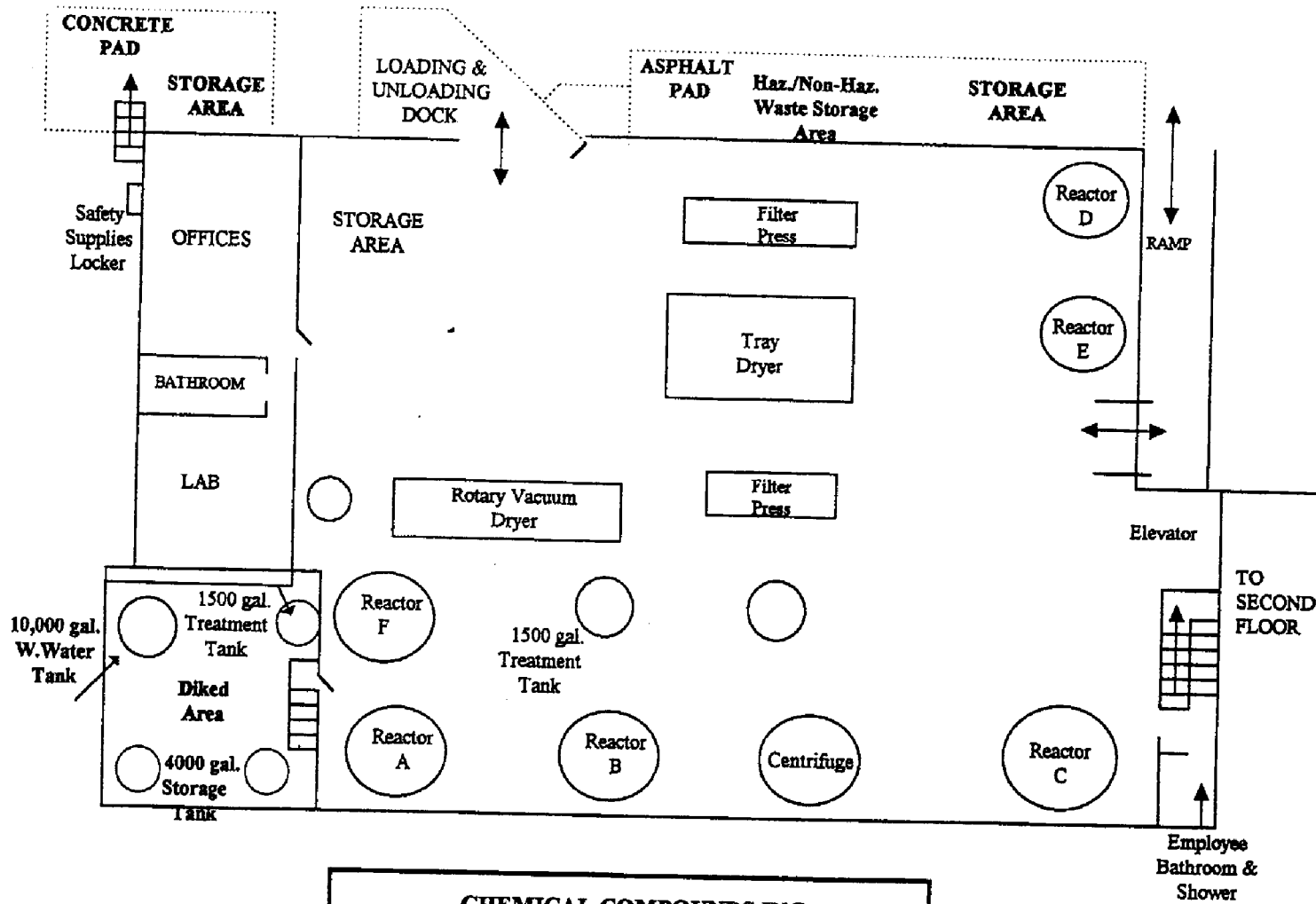
Matrix: Aqueous  
Date Received: 05/19/95

ANALYTES	RESULTS	MDL	UNITS	DILUTION FACTOR	METHOD BLANK RESULTS	MDL	ANALYSIS DATE
Cyanide, Total	ND	0.01	mg/L	1.	ND	0.01	05/23/95

845340071

51

845340072



**CHEMICAL COMPOUNDS INC.**  
 29-75 Riverside Ave.  
 Newark, N.J. 07104

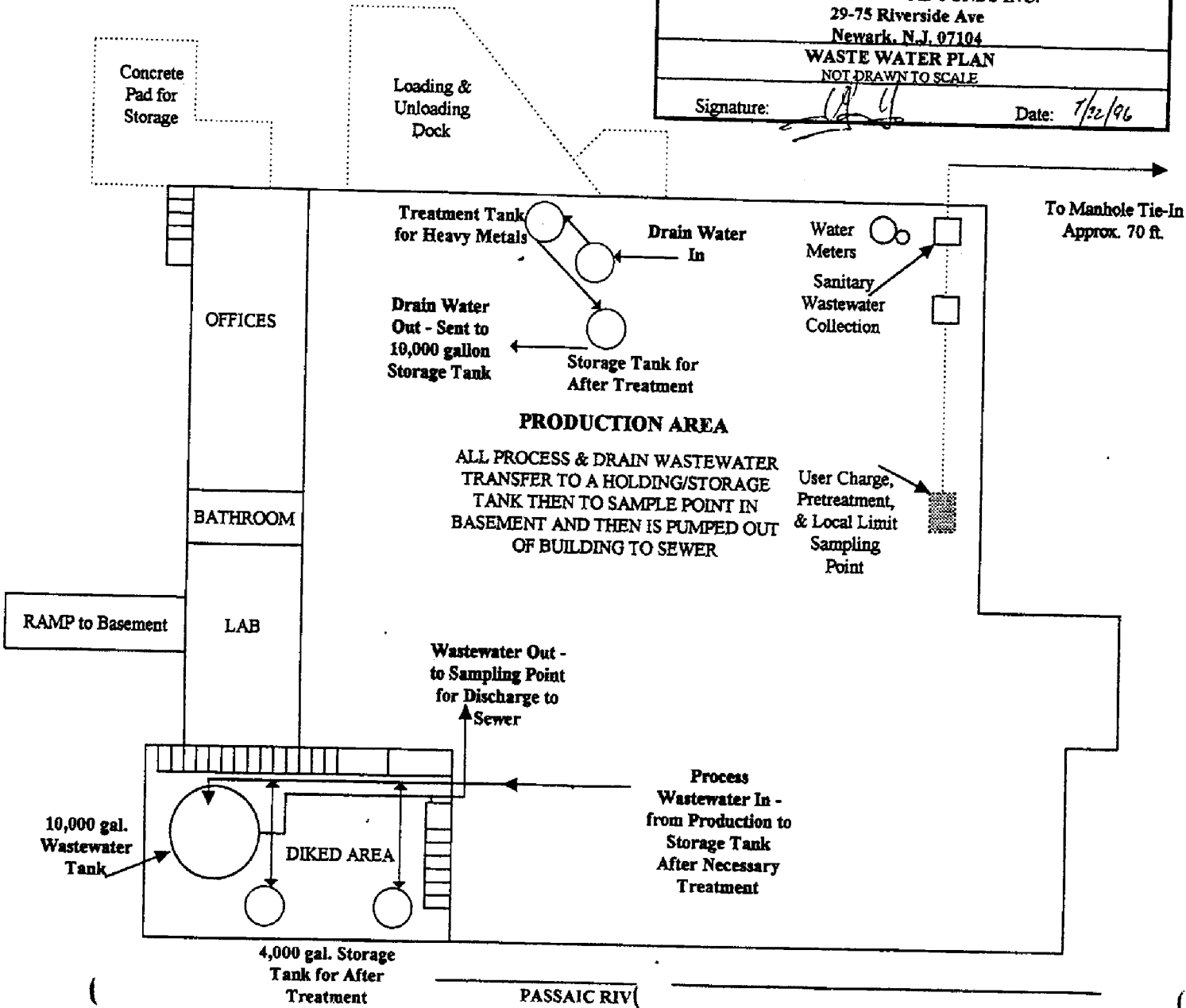
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**LOCATION OF STORAGE AREAS**

Signature: *[Handwritten Signature]* Date: 7/22/96

845340074

CHEMICAL COMPOUNDS INC.	
29-75 Riverside Ave	
Newark, N.J. 07104	
WASTE WATER PLAN	
NOT DRAWN TO SCALE	
Signature: <i>[Signature]</i>	Date: 7/22/96



845340075



845340076



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

INVESTIGATION

Case #: 92-01-07-1025

File #: 0714  
PAC CODE: TFF

Date: 01/07/92

Investigator: Matthew Garamone  
Christopher Gibbons

Time Arrived: 1115

Time Departed: 1400

Location: Chemical Compounds, Inc.  
Address: 29-75 Riverside Avenue  
Newark, NJ

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

Location Phone #: 201-485-3211

BER Dept. Rep: Bob Swales - Newark OEM Phone #: 201-733-3664

Origin of Complaint: Oper. Piccitto - NJSP Phone #: 201-578-8173  
Marine Bureau

I  
II  
Nature of Complaint: Unknown liquid being discharged from pipe onto ground and into Passaic River at incident location.

Findings: BER Region I responded to Newark to investigate the report of the NJSP Marine Bureau at Newark Bay of the discharge of an unknown, purple liquid from a pipe at the Chemical Compounds facility and entering the Passaic River. MPO's Mundorff and Kirschner of the NJSP Marine Bureau at Newark Bay were investigating a complaint of a suspected illegal discharge from Chemical Compounds' facility by employees at the Napp-Grecco Company adjacent to the incident location. MPO's Mundorff and Kirschner reported to Investigators Garamone and Gibbons that they had observed a hose line coming from the rear of the Chemical Compounds' building and discharging an unknown, purple liquid onto the ground adjacent to the Passaic River. An inspection of the property between the facility and the river revealed a large stained area with a free-standing puddle of a dark purple liquid with a strong odor of acetic acid. There were also signs of spillage over the bulkhead and into the river at this location. No hose line was present in this area at the time of BER I's inspection at the incident location.

III  
At the rear of the property, near to the Napp-Grecco Co., is an open pit with an exposed sanitary sewer line. There were free-standing puddles of dark purple liquid in this area. According to Chemical Compounds' owners, Alberto Celleri and Harold Sullivan, the facility

FROM Robert C Matulewicz 1-661 P.02  
MR 09 92 10:49 TO 2014854870

845340077

has been experiencing problems with this sanitary line backing-up and was attempting to unclog it by pumping it out and snaking the line. According to Alberto Celleri, the large stained area of ground with a puddle of dark purple liquid, on the side of the facility next to the Passaic River, was the result of the floors of the process area being washed down by an employee. This puddle indicated positive by Drager tests for acetic acid and had a pH of 1.

Chemical Compounds, Inc. manufactures hair dyes. In particular, the facility has been producing red #3 and HC-blue #2 hair dyes. The dark purple liquid observed on the ground around the outside of the facility is attributed to these two dyes. The facility stores its waste liquid from their processes in a 5,500 gallon capacity tanker located in the rear of the facility. Disposal of this material is through Chemical Waste Management which manifests the waste as a non-hazardous process liquid n.o.s. Prior to recycling methanol in their processes, the facility also disposed of waste methanol through Chemical Waste Management and had an EPA generator number assigned to the facility (NJED 198-66-1737). The facility maintains a tanker filled with methanol on-site with a capacity of 4,000 gallons for their processes. Floor drains at the facility discharge into the sanitary sewer system according to Mr. Celleri. The facility, however, has no permit from PVSC to discharge any material from their processes into 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 employees at the Napp-Greco Co. adjacent to the incident location sought medical attention for chemical exposure at First Care Medical Group in Kearny. Investigators from the Essex County Prosecutor's Office and the Division of Criminal Justice also performed an investigation of this incident. Investigators Garamone and Gibbons issued a NOV to Chemical Compounds, Inc. for the discharge and non-notification of a discharge of a hazardous substance pursuant to the spill act. The facility contracted ENSI, Inc. of Newark to perform a clean-up of all free-standing liquid on the property and to collect samples for analysis of the stained areas of ground and free-standing liquid. The affected areas were covered with plastic and the need to remove any contaminated soil based on these

conclusions: BER Region I responded to Newark to investigate the spill by the NJSP Marine Bureau of the illegal dumping of an unknown liquid into the Passaic River from the Chemical Compounds' facility. The discharge of an unknown, dark purple liquid containing acetic acid and acetic anhydride occurred onto the ground at the facility. ENSI, Inc. of Newark was hired by the facility to perform a clean-up. A permit was issued for this discharge and the incident is under a criminal investigation by both the State and the County.

845340078

FROM Robert C. Matulec, Ess 1-BER P. 201-991-5210 2014854878

Recommendations: This case will be referred to BFO-Metro for follow-up work regarding the removal of suspected contaminated soil affected by this discharge at the facility and to evaluate the hazardous waste disposal practices of the facility.

[Signature]  
Investigator

01/13/92  
Date

\_\_\_\_\_

\_\_\_\_\_ Date

\_\_\_\_\_

\_\_\_\_\_ Date

O

REC'D 09 07 10:51 AM 10 2013 4874  
PLANT MODEL 1 02/01/89

845340079

**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.

**845340080**

**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. X

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

**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. X

**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. X 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.

845340081

**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.

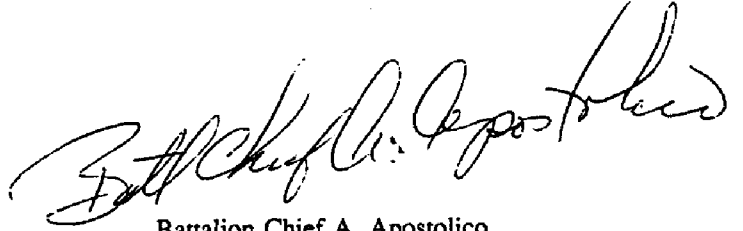
The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow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

845340082

**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

FAX 201 733-7506  
Vincent 733-7492  
Sadd

845340083

845340084





TOTAL ANALYTICAL SERVICES FOR A SAFE ENVIRONMENT

nytest environmental inc.

January 31, 1992

Ensi Inc.  
194 Avenue L  
Newark, NJ 07105

Attn: Fred Virrazzi

Nyttest 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,

Nyttest Environmental Inc.

*Remo Gigante*

Remo Gigante  
Exec. VP

RG:  
Enc.

SHIPPED VIA: UPS RED

845340085

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

# nytest environmental inc.

## Sample Identification and Results

Log In No.: 10997

Sample No: 1  
Lab Sample ID No.: 1099701

Results	Max. Allowable Levels	Found
pH @ 20 C	2 - 12.5	4.35
Ignitability, F PM	140	> 212
Corrosivity, inches/year	0.250	< 0.01
Reactivity to Cyanide, PPM	-	< 1.0
Reactivity to Sulfide, PPM	-	< 1.0
Total Solids, X	-	49.3
Petroleum Hydrocarbons, PPM (Dry Wt.)	-	5350
PCB's ,PPM (Dry WT.)	-	< 2.0

ND = None Detected  
< = Less than

00010

845340086

*Arnold Sullivan*

817-5715

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,

*Susan Baturay*

Susan Baturay, D.Sc.  
Laboratory Director

SB/sn  
16031

845340087

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

<u>METALS</u>	<u>RESULTS</u>	<u>BLANK</u>	<u>MDL</u>	<u>MAX. ALLOWABLE LIMITS</u>
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

845340088

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

<u>WASTE CHARACTERISTICS</u>	<u>RESULTS</u>	<u>BLANK</u>	<u>MDL</u>	<u>MAX. ALLOWABLE LIMITS (ppm)</u>
PCB (mg/l)	N.D.	N.D.	0.36	(mg/kg) 5-50
Reactivity for CN-(mg HCN/l)	N.D.	N.D.	5.0	250
Reactivity for S-(mg H <sub>2</sub> S/l)	N.D.	N.D.	10.0	500
Total Pet.Hydc. (TPHC) (mg/l)	3.0	N.D.	0.10	30000
Ignitability (oF)	Not Ignitable	N/A	N/A	>140
Corrosivity as pH	4.5	N/A	N/A	2 < pH < 12.5

Test results are in mg/l, unless specified.

N/A: Not Applicable  
N.D.: Not Detected  
MDL: Minimum Detection Limit

845340089

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

<u>SAMPLE ID</u>	<u>RESULTS (unit)</u>
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

845340090

TECHNION  
 Testing and Research Laboratory  
 200 Delaware Avenue  
 Clinton, New Jersey 07014  
 (201) 773-5013  
 FAX # (201) 773-4788

PAGE 1 OF 2

LAB ID #

PRODUCT NAME CHEMICAL COMPOUNDS

PROJECT NO. \_\_\_\_\_

COLLECTED BY (Name) Frank J. Jan

(Signature) Jim

CHAIN OF CUSTODY

Site Type Site ID

TSI FAL METAL DRUMS	
---------------------------	--

Sample No.	Date Spld	Time Spld	Sampling Point and Sampling Method Description	Sample Material	Analysis	Remarks
DRUM #1	2-24-92	1400	DRUMS # 1-11 GRABS	LIQUID		
DRUM #2	2-24-92		" " "			
DRUM #3	2-24-92		" " "			
DRUM #4	2-24-92		" " "			
DRUM #5	2-24-92		" " "			
DRUM #6	2-24-92		" " "			
DRUM #7	2-24-92		" " "			
DRUM #8	2-24-92		" " "			

RELINQUISHED BY	ORGANIZATION	DATE/TIME	RECEIVED BY	ORGANIZATION	DATE/TIME	REMARKS
<u>Harold Sullivan</u>	<u>CHEMICAL COMPOUNDS</u>	<u>2/24/92 1430</u>	<u>Frank J. Jan</u>	<u>TECHNION INC.</u>	<u>2/24/92 1430</u>	

845340091

Testing and Research Laboratory  
 200 Delaware Avenue  
 Camden, New Jersey 08104

LAB # 7

TEL (201) 773-5013  
 FAX (201) 773-4788

PRODUCT NAME Chemical Compounds

PROJECT NO. \_\_\_\_\_

COLLECTED BY (Name) Frank J. Green

(Signature) Frank J. Green

CHAIN OF CUSTODY

Site Type 55 GAL. DRUMS Site ID \_\_\_\_\_

Sample No.	Date Spld	Time Spld	Sampling Point and Sampling Method Description	Sample Material	Analysis	Remarks
DRUM #9	2-24-92	1406	DRUMS #1-11 GRABS	LIQUID		
DRUM #10	2-24-92		" " "			
DRUM #11	2-24-92		" " "			
DRUM COMPOSITE			GRABS FROM #1-11			RCA WASTE CLASSIFICATION

RELINQUISHED BY	ORGANIZATION	DATE/TIME	RECEIVED BY	ORGANIZATION	DATE/TIME	REMARKS
<u>Harold Sullivan</u>	<u>CHEMICAL COMPOUNDS</u>	<u>2/24/92 1430</u>	<u>Frank J. Green</u>	<u>TECHNION INC.</u>	<u>2/24/92 1430</u>	

845340092





845340094

FILED

DEC 5 1994

HARRY A. MARGOLIS  
P.J. Ch

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

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

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. § 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;

845340095

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 § 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.

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

5. 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. If the 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

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.

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.

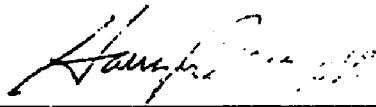
19. The defendant shall give written notice of this Order to any successor in interest prior to transfer of ownership of the facility which is the subject of this Order and shall simultaneously verify to the PVSC that such notice has been given.

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.

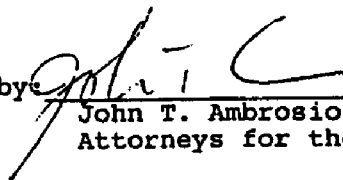


Hon. Harry A. Margolis, P.J.Ch.

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

GABRIEL M. AMBROSIO, ESQ.

Dated: 11/2/94

by   
John T. Ambrosio, Esq.  
Attorneys for the PVSC

CHEMICAL COMPOUNDS, INC.

Dated: 11/29/94

  
Authorized Signature

ALBERTO CELLERI  
Print Name

PRESIDENT  
Print Title & Position

JTA:ja  
Chemical Compounds.con

845340104

**VIOLATION NOTICE**  
**HAZARDOUS MATERIALS REGULATIONS**

CITY OF NEWARK  
FIRE DEPARTMENT

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

NOTICE OF VIOLATION AND ORDER TO TERMINATE       NON COMPLIANCE       COURT ACTION REQUIRED

IDENTIFICATION	
LOCATION: <u>29 Riverside Avenue</u>	Block: _____ Lot: _____
OWNER: Name <u>Chemical Compounds</u>	AGENT: Name <u>Harold Sullivan</u>
Address <u>29-75 Riverside Avenue</u>	Address <u>29-75 Riverside Avenue</u>
Town/State/Zip <u>Newark, NJ 07104</u>	Town/State/Zip <u>Newark, NJ 07104</u>
"HM" Permit #: _____	

ACTION		
DATE OF NOTICE: _____	COMPLIANCE DUE DATE: _____	DATE OF INSPECTION: _____
<p>TAKE NOTICE that you have been found to be in violation of the City of Newark Ordinance ( 6S&amp;FE amended March 21, 1990) governing hazardous materials:</p> <p>Section 8.4</p> <p>Section 10.1 B</p> <p>Section 12.2</p> <p>Section 15.1</p> <p>Section 18.4</p>		
If you have any questions concerning this matter, please call: <u>(201) 733 - 7495</u>		
Inspector <u>[Signature]</u> Officer in Charge Fire Prevention & Safety	Date _____	Hazmat Officer _____ Received by: _____ Date _____

**845340105**

**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) 733-7488

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 site recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected earth and into the Passaic River.

**845340106**

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 Chlorhydrin)

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.

845340107

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.

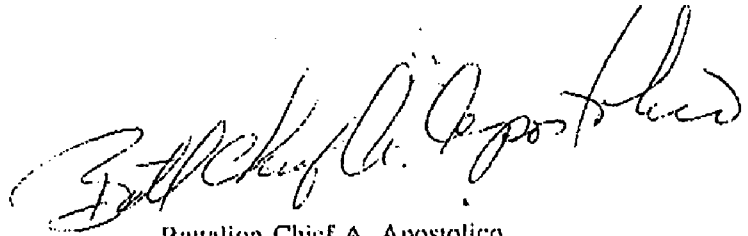
The person who placed the hose leading from the building to the ground and into the river did not remain on the premises.

845340108



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 of 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:fm

845340109

## **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

attn: 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 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.

### **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 chlorhydrin.

**845340110**

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

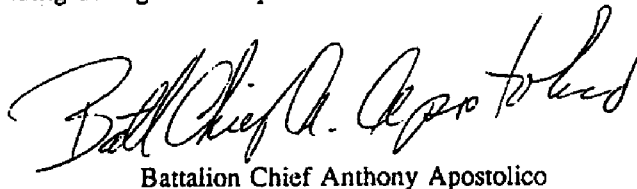
All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

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

845340111

845340112

DEC 116  
4/89

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

FIELD NOTICE OF VIOLATIONS

CASE NO. 92-0107-1025 DATE 01/07/92  
CASE NAME CHEMICAL COMPOUNDS INC. ILLEGAL DUMPING  
INCIDENT LOCATION PASSAIC RIVER + RIVERSIDE AVE, NEWARK  
RESPONSIBLE PARTY ADDRESS CHEMICAL COMPOUNDS  
29-75 Riverside Ave., Newark N.J. 07104  
RESPONSIBLE PARTY REPRESENTATIVE AL CELLERI / HAROLD SULLIVAN

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.

- NJSA 58:10-23.11 c, e SPILL COMPENSATION AND CONTROL ACT
- NJSA 23:5-28 POLLUTION AND OBSTRUCTION OF WATER
- NJAC 7-26 \_\_\_\_\_ HAZARDOUS WASTE REGULATIONS
- \_\_\_\_\_
- \_\_\_\_\_

DESCRIPTION OF VIOLATION Discharge + non-notification of a hazardous substance into the waters and onto the land of the State of N.J. pursuant to the regulations of the Spill Compensation and Control Act of the State of N.J.

Within immediately days of receipt of this notice, you shall submit in writing, to the address and investigator indicated below, an account of the incident and corrective measures taken to attain compliance.

Investigator Matthew Garamone  
Address NOJEP - Emergency Response Unit  
230 Newark Street - Newark, NJ 07102

COPIES: White - File Yellow - Investigator Pink - Responsible Party



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. Welner  
 Commissioner

Karl 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 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.

Very truly yours,

*Stanley DeJikat*  
 Stanley DeJikat

*T. No. 100-1000  
 OF STATE OF N.J.*

DEP-062A  
10/91

New Jersey Department of Environmental Protection and Energy

Check here if Revised Billing

**ENFORCEMENT INVOICE**

Document # \_\_\_\_\_  
Date Rec'd \_\_\_\_\_  
Amount \_\_\_\_\_

DIVISION B.P.S.R.

PROGRAM EMERGENCY RESPONSE

TYPE:  Fine/Penalty  Cost Recovery

FACILITY ID NO. \_\_\_\_\_

PROGRAM ID NO. 92-01-07-1025

Case/Company Name Chemical Compounds

Address 29-75 Riverside Avenue  
Newark, NJ 07104

Please identify appropriate category:

- County Authority:  Industrial
- Local  Regional  Commercial
- Private  Local  Other - Specify

DATE ASSESSED	DESCRIPTION	AMOUNT
2/7/92	ADMINISTRATIVE COST RECOVERY	\$708.60
DATE DUE: <u>March 31, 1992</u>	AMOUNT DUE:	\$708.60

Make check payable to: Treasurer, State of New Jersey

Mail to: NJDEPE, Bureau of Revenue  
CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

845340114

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

PROJECT ACTIVITY # TFE

Case Name: Chemical Compounds

CASE  
 I.D.NO. 92-01-07-1025-33

COST CALCULATION: \$708.60

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	OVERTIME RATE	HOURS	AMOUNT
M. Garamone	1/7/92	52.20	4.0	208.80	----	----	----
C. Gibbons	1/7/92	52.20	3.5	182.70	----	----	----
M. Garamone	1/9/92	52.20	2.0	104.40	----	----	(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			

Equipment:

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

845340115

1086

**Subpoena Duces Tecum  
Superior Court of New Jersey**

State of New Jersey )  
                                  ) SS  
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 Market St., 4th floor

In the City of Trenton on Friday  
January 24th at 11:30 AM

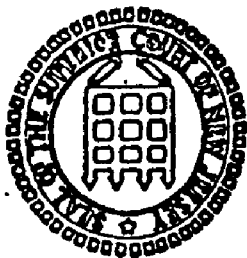
to give evidence before the State Grand Jury and you are ordered to appear without prepayment of witness fee and bring with you the following records: \_\_\_\_\_

See Attached Schedule "A"

If you fail to appear and produce the said records, a warrant may be issued for your arrest and you may be charged with contempt.

WITNESS, the Honorable Samuel D. Lenox, Jr., Judge of the Superior Court,

this 13th day of January, 1992.



*Donald E. Phelan*

Donald E. Phelan  
Acting Clerk of the Superior Court

*James W. Klassen*  
James W. Klassen, DAG  
(609) 984-4470

Received this subpoena at Trenton on 1/13/92 and on 1/14/92

at 29-75 Riverside Ave Newark I served it on the within named Harold Sullivan  
Dtdy 17  
by delivering a copy to him.

Date 1/14/92

*Leon L. Luzzell* 970  
State Supervisor  
Signature and Title

845340116



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

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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:
  - b. 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.
  - d. 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.

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.

845340117

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.
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.

845340118



State of New Jersey  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF CRIMINAL JUSTICE

ROBERT J. DEL TUFO  
ATTORNEY GENERAL

CN 085  
RICHARD J. HUGHES JUSTICE COMPLEX  
TRENTON, NEW JERSEY 08625-0085  
TELEPHONE: 609-984-6500

ROBERT T. WINTER  
DIRECTOR

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

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

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

WAIVER OF INDICTMENT AND  
TRIAL BY JURY

CHEMICAL COMPOUNDS, INC., the above named defendant, charged with unlawful discharge 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 indictment and trial by jury, hereby waives prosecution by indictment 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

CHEMICAL COMPOUNDS, INC.

By: \_\_\_\_\_

Reported By:

Approved and accepted on this  
day of                                    , 1992,  
in the presence of the  
defendants and in open court.

\_\_\_\_\_  
James W. Glassen  
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

845340121

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

*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:

1. 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.

845340123

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.

845340124



CHEMICAL COMPOUNDS, INC.  
2976 RIVERSIDE AVENUE  
NEWARK, NJ 07104

6235

September 9 19 92

66-2/212  
130

PAY  
TO THE  
ORDER OF

*TACELUM STAFF OF NJ*

\$ 5,000.00

Five thousand and 00/00 ..... DOLLARS



First Fidelity Bank, N.A., New Jersey  
Executive Office 130  
550 Broad Street  
Newark, N.J. 07102

*[Signature]*

FOR

⑈006235⑈ ⑆021200025⑆ 113 117266 1⑈

CHEMICAL COMPOUNDS, INC.  
2976 RIVERSIDE AVENUE  
NEWARK, NJ 07104

6236

September 9 19 92

66-2/212  
130

PAY  
TO THE  
ORDER OF

*ENVIRONMENTAL PROTECTION*

\$ 1,760.85

One thousand seven hundred sixty and 85/00 ..... DOLLARS



First Fidelity Bank, N.A., New Jersey  
Executive Office 130  
550 Broad Street  
Newark, N.J. 07102

*[Signature]*

FOR

⑈006236⑈ ⑆021200025⑆ 113 117266 1⑈

845340125

DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF STATE POLICE

MP 71647

Municipal Court of \_\_\_\_\_  
 Superior Court, Special Part  
of ESSEX County, New Jersey

Docket # \_\_\_\_\_ Receipt # \_\_\_\_\_ Amt. \$ \_\_\_\_\_  
State of New Jersey as **SUMMONS** 0700

County of ESSEX  
YOU ARE HEREBY SUMMONED TO APPEAR PERSONALLY BEFORE THIS COURT AT THE TIME AND PLACE SPECIFIED BELOW TO ANSWER THE FOLLOWING VIOLATION(S):

On	Date	Mo	Yr	Day	Hour	AM	PM	1045
Name	/First (Print)		Initial		Last			
CHEMICAL CONTAINERS INC								
Address								
2975 RIVERSIDE AVE								
City								
NEWARK								
State								
NJ								
Zip								
07102								
Telephone No.			Home			Business		
301 485 3211								
Operators Lic. No.						State		Exp. Date
Birth Date		Date		Mo	Yr	Eyes	Sex	Weight

DID UNLAWFULLY VIOLATE THE PROVISIONS OF  
N.J.S. 23:5-28 N.J.A.C. \_\_\_\_\_  
By committing the following violation(s) DID DRAIN CHEMICAL CONTAINERS INTO SEWER DRAIN  
At or Upon PASSAIC RIVER  
In the Municipality of NEWARK County of ESSEX

Doc. #	Exp. Date	
Reg. #		
Name		
Male		
Home		
City	State	Length
Port	Color	
Population	Type	Color

YOU ARE NOTIFIED THAT THE UNDERSIGNED WILL FILE A COMPLAINT IN THIS COURT CHARGING YOU WITH THE VIOLATION(S) SET FORTH ABOVE.

1/7/92 Date MPD Ken Penick Signature of Complainant 910 Badge No.

Identification F010-Newark Bay

NOTICE: IF YOU INTEND TO PLEAD NOT GUILTY AND TO CONTEST THE CHARGE SPECIFIED IN THIS SUMMONS, AT LEAST 3 DAYS PRIOR TO THE DATE FIXED FOR YOUR APPEARANCE IN COURT, YOU MUST NOTIFY THE CLERK, WHOSE ADDRESS AND TELEPHONE NUMBER IS SHOWN ON THE SUMMONS, OF YOUR INTENTION. IF YOU FAIL TO SO NOTIFY THE CLERK IT MAY BE NECESSARY FOR YOU TO MAKE TWO COURT APPEARANCES.

Court Appearance Required  **YOU WILL BE NOTIFIED**

Court Appearance \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_ at \_\_\_\_\_ M.

Address of Court \_\_\_\_\_  
Court Telephone 301-733-6520

**SUMMONS** (Form approved May 25, 1992, pursuant to Rules 1:32-3, 4:70-3(a) & 7:3-1(b).)

845340126



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 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 \$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.

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

DEPE-062A  
10

New Jersey Department of Environmental Protection and Energy

Document # \_\_\_\_\_  
Date Rec'd \_\_\_\_\_  
Amount \_\_\_\_\_

**ENFORCEMENT INVOICE**

Check here if Revised Billing

DIVISION R.P.S.R.  
PROGRAM EMERGENCY RESPONSE

TYPE:  Fine/Penalty  Cost Recovery

FACILITY ID NO. \_\_\_\_\_  
PROGRAM ID NO. 93-10-05-1110

Case/Company Name Chemical Compounds Inc.  
Address 29-75 Riverside Avenue  
Newark, NJ 07102

Please identify appropriate category:  
 County Authority:  Industrial  
 Local  Regional  Commercial  
 Private  Local  Other - Specify

DATE ASSESSED	DESCRIPTION	AMOUNT
11/12/93	ADMINISTRATIVE COST RECOVERY	\$866.47
DATE DUE: DECEMBER 30, 1993		AMOUNT DUE: \$866.47

Make check payable to: Treasurer, State of New Jersey

Mail to: NJDEP, Bureau of Revenue  
CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

845340128

13-3-93 - 11:30

*Sent 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  
93-10-05-1110

COST CALCULATION: \$866.47

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	O.T. RATE	HOURS	AMOUNT
B. Doyle	10/5/93	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
				Reg. Total =	375.27	O.T. Total = 100.98	

REPORT:

B. Doyle	10/5/93	64.43	4.0	257.72
Report Total =				257.72

EQUIPMENT:

Item:	Amount
HazCat	75.00
OVA	50.00
Drager Tubes	7.50

Equipment Total = 132.50

TOTAL AMOUNT DUE = \$866.47

845340129

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 RIVERSIDE AV. NEWARK, N.J. 07104  
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 N.J.A.C. 7:26-9.3(a)3 - no  
accumulation sheet date on containers  
9.7(c) - failing to describe the response actions  
9.7(e) - failing to describe arrangements with  
local authorities  
9.7(f) - no home addresses of emergency coordinators  
9.4(g)(i) - no job title for each position  
9.4(g)(ii) - no written job description  
9.4(g)(8) - no emergency drills conducted.

Remedial action to correct these violations must be initiated immediately and be completed by

OCT. 14. 94 Within fifteen (15) days of receipt of this Notice of Violation, you 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.

[Signature]  
Facility Receipt of Copy Only

[Signature]  
Investigator, Division of Facility Wide Enforcement  
Department of Environmental Protection & Energy

845340130

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) 689-3900



**NOTICE OF VIOLATION**

ID NO. NJ 108661-737 DATE SEP. 14. 94  
NAME OF FACILITY CHEMICAL COMPOUNDS, Inc  
LOCATION OF FACILITY 29-75 RIVERSIDE AV. NEWARK, NJ 07104  
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 NJAC 7:26-9.6(f)1 - failing to  
familiarize local authorities  
9.6(f)3 - no agreements with emergency contractor  
9.6(f)4 - failing to familiarize local hospital  
9.6(f)5 - no fire inspections

Remedial action to correct these violations must be initiated immediately and be completed by

OCT. 14. 94 Within fifteen (15) days of receipt of this Notice of Violation, you 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.

[Signature]  
Facility Receipt of Copy Only

[Signature]  
Investigator, Division of Facility Wide Enforcement  
Department of Environmental Protection & Energy

845340131



**845340132**



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

in block letters. (Form designed for use on site (12-pitch) typewriter.)

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

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5580 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ01101066117379901	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
Generator's Name and Mailing Address CHEMICAL COMPOUNDS - 2975 RIVERIDE AVE BLDG. 17 - NEWARK, NJ 07104				A. State Manifest Document Number <b>NJA 0765131</b>		
4. Generator's Phone (201) 495-2212				B. State Generator's ID		
5. Transporter 1 Company Name FREEHOLD CARTRIDGE INC.		6. US EPA ID Number NJ0104571361017		C. State Trans. ID S-2201-TAPPC		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone		
9. Designated Facility Name and Site Address ECOFIS - 3705 PATRIOT ST GREENSBORO, NC 27407				E. State Trans. ID		
				F. Transporter's Phone ( )		
				G. State Facility's ID		
				H. Facility's Phone ( )		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	13. Total Quantity	14. Unit (Wt/Vol)	15. Waste No.	
a. 2975 METAL FLAMMABLE LIQUID (F003)		1			E F 0 0 3	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above 11A - METANOL 10% 11B - WATER 70%				K. Handling Codes for Wastes Listed Above		
16. Special Handling Instructions and Additional Information A-12 ECO-009 JOB # C-0008						
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 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 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.						
Printed/Typed Name		Signature		Month Day Year		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
19. Discrepancy Indication Space GENERATOR DID NOT DATE				845340133		
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name		Signature		Month Day Year		



State of New Jersey  
 Department of Environmental Protection  
 Division of Hazardous Waste Management  
 Manifest Section  
 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 9-30-91

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <i>MTD11086617371990</i>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <i>Chemical Compounds, Inc. 89-75 Riverdale Ave Newark, NJ 07104</i>		4. Generator's Phone <i>(201) 485-3212</i>	A. State Manifest Document Number <i>NJA 0869094</i>	B. State Generator's ID Number <i>STATE</i>
5. Transporter 1 Company Name <i>Chemical Waste Management of New Jersey, Inc</i>		6. US EPA ID Number <i>MTD0997021681</i>	C. State Trans. ID <i>SI 0231</i>	D. Transporter's Phone <i>(201) 485-3212</i>
7. Transporter 2 Company Name		8. US EPA ID Number	E. State Trans. ID	F. Transporter's Phone
9. Designated Facility Name and Site Address <i>Chemical Waste Management of New Jersey, Inc 100 Lister Ave Newark, NJ 07105</i>		10. US EPA ID Number <i>MTD01892116790</i>	G. State Facility's ID	H. Facility's Phone
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. <i>Nonhazardous Dye Wash Water - Not regulated by HRCR</i>		1	1	1
b.				
c.				
d.				
Additional Descriptions for Materials Listed Above <i>3 - 55 L plastic drums, lined - 2 - 55 L plastic drums, lined - water 20% 26%</i>		K. Handling Codes for Wastes Listed Above <i>SD/101</i>		
15. Special Handling Instructions and Additional Information <i>CWM # K3525 (201) 850-1136 Wt # A26643 I11000 of 8 materials</i>				
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 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 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.				
Printed/Typed Name <i>HAROLD E. SULLIVAN</i>		Signature <i>Harold E. Sullivan</i>		Month Day Year <i>01/10/15/11</i>
17. Transporter 1 Acknowledgment of Receipt of Materials				
Printed/Typed Name <i>Robert Harrison</i>		Signature <i>Robert Harrison</i>		Month Day Year <i>02/10/15/11</i>
18. Transporter 2 Acknowledgment of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space <i>Section 1 and 15 email Sorry numbers added as per communication with Harold Sullivan 1/14/11 01/13/2011 to 3K123 3000000003</i>				
Printed/Typed Name <i>JOHN SAC... ..</i>		Signature <i>John Sac...</i>		Month Day Year <i>01/10/15/11</i>

In case of an emergency or spill, immediately call the state fire emergency or call the N.J. Dept. of Environmental Protection, (609) 292-5808 (day) / (609) 292-7772 (night)

EPA Form 8700-22 (Rev. 9/89) Previous editions are obsolete. SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

4 - TSD FACILITY COPY

845340134



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

Please type or print in block letters. (Form designed for use on office (12-pitch) typewriter.) Form Approved, OMB No. 2050-0038, Expires 9-30-87

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>NJ0108661737</b>	Manifest Document No. <b>494</b>	2. Page of <b>1</b>	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Chemical Components, Inc 275 Riverside Ave Newark, NJ 07104</b>		4. Generator's Phone <b>201 485-3262</b>		A. State Manifest Document Number <b>NJA 010866</b>	
5. Transporter 1 Company Name <b>Chemical Waste Management, Inc</b>		6. US EPA ID Number <b>ILD10912021681</b>		C. State Trans ID <b>15310331</b>	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone <b>201 485 3262</b>	
9. Designated Facility Name and Site Address <b>Chemical Waste Management of New Jersey, Inc 100 Lister Avenue, Newark, NJ 07102</b>		10. US EPA ID Number <b>NJ01051921167710</b>		E. State Drive ID <b>15310331</b>	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) <b>HM</b>		12. Containers	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. <b>NOT HAZARDOUS PER US DOT Dye Waste Water</b>		No. <b>001</b>	Type <b>TR</b>	<b>959996</b>	<b>2900</b>
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information <b>K32692 W/O# A26095-A-27398 NJ DECAC# 60706 IN CASE OF EMERGENCY CALL 485-5212</b>		K. Handling Codes for Wastes Listed Above <b>01/01</b>			
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 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 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.					
Printed/Typed Name <b>HAROLD E. SULLIVAN</b>		Signature <i>[Signature]</i>		Month Day Year <b>09/11/91</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>DAVID R. KAMM</b>		Signature <i>[Signature]</i>		Month Day Year <b>02/18/91</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>\$ 13 amended to 4943</b>					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 18. Printed/Typed Name <b>USAC 10P02</b>		Signature <i>[Signature]</i>		Month Day Year <b>09/11/91</b>	

In case of an emergency or spill immediately call the state or the emergency or 14, and the U.S. Dept. of Environmental Protection. (800) 268-5888 (NJ) (800) 296-7172 (other)

845340135



State of New Jersey  
 Department of Environmental Protection  
 Division of Hazardous Waste Management  
 Manifest Section  
 CN 026, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on efile (12-pBch) typewriter.) Form Approved, OMB No. 2050-0029, Expires 9-30-91

In and the N.J. Dept. of Environmental Protection, (609) 691-4848 (24hr) (609) 292-7172 (9am-11pm)  
 In case of an emergency or spill, immediately call the state the emergency ac

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC.</b> <b>27-75 RIDGERSIDE AVE NEWARK N.J 07104</b>		4. Generator's Phone: <b>(201) 485-3213</b>		A. State Manifest Document Number <b>NJA 0869037</b>	
5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT INC</b>		6. US EPA ID Number <b>01-121261211</b>		C. State Trans. ID <b>15121261211</b>	
7. Transporter 2 Company Name <b>0</b>		8. US EPA ID Number		D. Transporter's Phone	
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC.</b> <b>100 HUNTER PARKWAY SUITE 100 WATSONVILLE CA 94588</b>		10. US EPA ID Number		E. State Trans. ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type		13. Total Quantity Unit	
a. <b>NOT HAZARDOUS FOR U.S. DOT</b> <b>DYE WASTE WATER</b>		14. Unit <b>1105000</b>		15. Waste No. <b>15121261211</b>	
J. Additional Descriptions for Materials Listed Above <b>ALL HAZARDOUS WASTE</b>		K. Handling Codes for Wastes Listed Above <b>S01/T01</b>			
15. Special Handling Instructions and Additional Information <b>WG # A 28314</b>					
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 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 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.					
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name <b>HAROLD E SULLIVAN</b>		Signature <i>Harold E Sullivan</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name <b>GILBERT BOSTON</b>		Signature <i>Gilbert Boston</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space <b># 13 Non-hazardous 0997</b>					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 18.		Printed/Typed Name <b>WILLIAM C. PETERSON</b>		Signature <i>William C Peterson</i>	

EPA Form 6700-22 (Rev. 9/84) Previous editions are obsolete.

4 - TSD FACILITY COPY

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

845340136



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

Please type or print in block letters. (Form designed for use on either 12-pitch typewriter.)

Form Approved OMB No. 2080-0009 Expires 6-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address		4. Generator's Phone		A. State Manifest Document Number	
CHEMICAL COMPOUNDS INC 29-75 RIVERSIDE AVE - NEWARK NJ 07104		201-495-3212		NJ 088008	
5. Transporter 1 Company Name		6. US EPA ID Number		B. State Generator's ID	
CHEMICAL WASTE MGMT INC		17-1111999-2236181		SAME	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Trace ID	
				51709154	
9. Designated Facility Name and Site Address		10. US EPA ID Number		D. Transporter's Phone	
CHEMICAL WASTE MANAGEMENT INC 100 LISTER AVE. NEWARK NJ 07102		17-1111999-2236181		201-495-3212	
				E. State Trace ID	
				51709154	
				F. Transporter's Phone	
				201-495-3212	
				G. State Facility ID	
				51709154	
				H. Facility's Phone	
				201-495-3212	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	
HM		No. Type		Unit W/Vol	
NON HAZARDOUS DYE WASH WATER NOT REGULATED BY 49 CFR		1 11X40012 C		8190 L	
14. Additional Descriptions for Materials Listed Above		15. Handling Codes for Wastes Listed Above			
AMMONIUM ACETATE 10/13 AMMONIUM SULFATE 11/3 ACETIC ACID 12/7		SUSTAIN			
16. Special Handling Instructions and Additional Information		17. Decal 60731			
WATER 65% CHEMICAL WASTE MANAGEMENT W/D # A-28931					
18. 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. 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 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.		19. Printed/Typed Name		20. Signature	
		Harold E. Sullivan		Harold E. Sullivan	
		Month Day Year		10/1/91	
21. Transporter 1 Acknowledgment of Receipt of Materials		22. Printed/Typed Name		23. Signature	
		Herbert Doman		Herbert Doman	
		Month Day Year		10/6/91	
24. Transporter 2 Acknowledgment of Receipt of Materials		25. Printed/Typed Name		26. Signature	
		Month Day Year			
27. Discrepancy Indication Space		28. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.			
# is amended to 5245 About 60 gal left in tank					
29. Printed/Typed Name		30. Signature		31. Month Day Year	
Harold E. Sullivan		Harold E. Sullivan		10/1/91	

In case of an emergency or spill immediately call the state emergency center and the N.J. Dept. of Environmental Protection. (609) 292-6000 (day) (609) 292-7172 (night)

845340137



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

Form Approved OMB No. 2060-0038 Expires 6-30-91

Please type or print in block letters. (Form designed for use on 8 1/2" (13-pin) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJDA0186611737		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <i>Chemical Compounds 29-75 Livingston Avenue Bldg 17 Newark, NJ 07102-3212</i>		4. Generator's Phone No. 973-245-3212		5. Transporter 1 Company Name <i>Chemical Waste Management, Inc.</i>		6. Transporter 1 US EPA ID Number NJDA0186611737		7. State Manifest Document Number <b>NJDA 228360</b>	
8. Designated Facility Name and Site Address <i>Chemical Waste Management of New Jersey, Inc. 100 Lister Avenue Newark, NJ 07102</i>		9. Facility's US EPA ID Number NJDA0186611737		10. Facility's Phone No. 973-245-3212		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) NM <i>Non-Hazardous Dry Solids Containing Not Regulated by 49 CFR</i>		12. Containers No. Type <i>0011 TX 5000 G 1910</i>	
13. Special Handling Instructions and Additional Information <i>Decont 10715</i>		14. Handling Codes for Wastes Listed Above <i>SDX H01</i>		15. 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. 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 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.		16. Transporter 1 Acknowledgment of Receipt of Materials Printed/Typed Name: <i>Herbert Danieson</i> Signature: <i>Herbert Danieson</i> Month Day Year: <i>10/3/91</i>		17. Transporter 2 Acknowledgment of Receipt of Materials Printed/Typed Name: _____ Signature: _____ Month Day Year: _____	
18. Discrepancy Indication Space <i>Dr 3 amended to SD69</i>		19. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 18. Printed/Typed Name: <i>WISAC Roll-2</i> Signature: <i>WISAC Roll-2</i> Month Day Year: <i>10/3/91</i>		20. Facility Owner or Operator Signature		21. Facility Owner or Operator Signature		22. Facility Owner or Operator Signature	

In case of an emergency or spill immediately call the state the emergency occur and the N.J. Dept. of Environmental Protection. (609) 262-1388 (24hr) (609) 262-7172 (Night)

845340138



State of New Jersey  
 Department of Environmental Protection  
 Division of Hazardous Waste Management  
 Manifest Section  
 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. 2050-0029. Expires 9-30-

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5660 (Day) (609) 292-7172 (Night)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC 29-75 RIVERSIDE AVE NEWARK NJ 07102</b>		4. Generator's Phone (201) 455-3212		A. State Manifest Document Number <b>NJA 1228352</b>	
5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT</b>		6. US EPA ID Number		B. State Generator's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Trans. ID	
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF N.J. 100 LISTER AVE 410 WILSON AVE</b>		10. US EPA ID Number		D. Transporter's Phone (201) 465-8121	
				E. State Trans. ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (201) 465-9100	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type		13. Total Quantity	
a. <b>NOT HAZARDOUS PER US DOT DYE WATER</b>		1   15		570.00 G X 1900	
b.					
c.					
d.					
14. Additional Descriptions for Materials Listed Above <b>WASTE # 707 AMMONIUM ACETATE 107 AMMONIUM SULFATE 107 ACETIC ACID 107</b>		15. Special Handling Instructions and Additional Information <b>UNSAFE 3342X DE LAC #12856</b>		K. Handling Codes for Wastes Listed Above	
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 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 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.		Printed/Typed Name <b>DAVID E. SULLIVAN</b>		Signature <i>[Signature]</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name <b>Jack Fontey</b>		Signature <i>[Signature]</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space				845340139	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name		Signature	
				Month Day Year	





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

845340140

Form Approved OMB No. 2050-0039 Expires 8-30-91

Case type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection, (609) 292-5560 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <u>MTA1010661173200000</u>		2. Page 1 of 2 information in shaded areas not required by Federal law.	
3. Generator's Name and Mailing Address <u>CHEMICAL COMPANY INC.</u> <u>2975 RIVERSIDE AVE. NEWARK, N.J. 07102</u>		4. Generator's Phone (201) <u>485-3212</u>		5. Transporter 1 Company Name <u>WASTE MANAGEMENT</u>	
6. US EPA ID Number <u>MTA1010661173200000</u>		7. Transporter 2 Company Name		8. US EPA ID Number	
9. Designated Facility Name and Site Address <u>NEW JERSEY DEPARTMENT OF ENVIRONMENT &amp; NATURE</u> <u>100 WESTER AVE</u> <u>NEWARK, N.J. 07102</u>		10. US EPA ID Number <u>MTA1010661173200000</u>		11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	
a. <u>HAZARDOUS DYE WASH WATER</u>		12. Containers No. <u>001</u>		13. Total Quantity <u>150 G</u>	
b. <u>stock water</u>		14. Unit WV/Vol		15. Waste No.	
c. <u>WATER 465</u>		16. Handling Codes for Wastes Listed Above <u>201 H01</u>		17. Special Handling Instructions and Additional Information <u># 12863</u> <u>EMERGENCY CONTACT (201) 485-3212</u>	
18. 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. 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 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.					
19. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: <u>HAROLD E. SULLIVAN</u>		Signature: <u>Harold E. Sullivan</u>		Month Day Year: <u>10/1/91</u>	
20. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: <u>DAVID K. KAMM</u>		Signature: <u>David K. Kamm</u>		Month Day Year: <u>10/1/91</u>	
19. Discrepancy Indication Space <u>Volume in manifests amended to 490.7 gal (m) 2-10-92</u>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name: <u>ANISHA C. YORRIZ</u>		Signature: <u>Anisha C. Yorriz</u>		Month Day Year: <u>10/1/91</u>	





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-

2020 type or print in block letters. (Form designed for use on 6-line (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ1D110191611713710101016	Manifest Document No. 0101016	2. Page 1 of 1	Information in the shaded area is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE. NEWARK N.J. 07104				A. State Manifest Document Number NJ 1228361	
4. Generator's Phone (201) 485-3212		6. US EPA ID Number		B. State Generator's ID SAME	
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT		7. US EPA ID Number NJ1D1019191210216181		C. State Trans. ID NJ1228361	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (609) 426-5212	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT of NJ 100 LISTER AVE NEWARK, N.J. 07105		10. US EPA ID Number NJ1D1018912116171910		E. State Trans. ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	
a. NON HAZARDOUS Dye WASH WATER NOT REGULATED BY 49 CFR		No. Type		14. Unit Wt/Vol	
b. WATER 96.5% to 98%		1		150 010 G	
c.					
d.					
15. Additional Descriptions for Materials Listed Above 22 [4-12-11] (57)		K. Handling Codes for Waste		WASTE PROFILE R-32525	
16. Special Handling Instructions and Additional Information WORK ORDER # 33479 DECAL #					
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 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 practicable method of treatment, storage, or disposal currently available to me which minimizes the present or 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.					
Printed/Typed Name Harold E. Sullivan		Signature Harold E. Sullivan		Month Day 10/21/09	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day	
Printed/Typed Name					
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day	
Printed/Typed Name					
19. Discrepancy Indication Space				845340141	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 18.					
Printed/Typed Name		Signature		Month Day	

In case of an emergency or spill, please call the state for assistance.

EPA Form 8700-22 (Rev. 5/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

1 - TSD MAIL TO - TSD'S STATE



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

Please type or print in block letters. (Form designed for use on ellipse (12-pitch) typewriter.)

Form Approved OMB No. 2050-0035 Expires 9-3

In case of an emergency or spill immediately call the state the emergency occurred in or N.J. Dept. of Environmental Protection, (609) 292-5540 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ D10181661737090107		2. Page 1 of 1		Information in the shaded area is not required by Federal law.	
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE NEWARK NJ 07104		4. Generator's Phone (201) 485-3228		5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT		6. US EPA ID Number NJ D10181661737090107	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. SP 100 LISTER AVE. NEWARK N.J. 07105		10. US EPA ID Number NJ D10181661737090107	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
a. NON HAZARDOUS DYE WASH WATER WASH		XXVII		15010 B		G	
b.							
c.							
d.							
Additional Descriptions for Materials Listed Above 22. H <sub>2</sub> O - Hydroxyethyl		K. Handling Codes for Wastes Listed Above S001 P01					
15. Special Handling Instructions and Additional Information #A33537 #12852							
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 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 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.		Printed/Typed Name HAROLD SULLIVAN		Signature Harold Sullivan		Month Day Year 02/1/89	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name MIKE MAENZA		Signature Mike Maenza		Month Day Year 02/1/89	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 16.		Printed/Typed Name JULIAN TORRES		Signature Julian Torres		Month Day Year 02/1/89	



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

845340143

Please type or print in block letters. (Form designed for use on 8 1/2 x 11 (14-pitch) typewriter.)

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5550 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>NJID 10916173709018</b>	2. Manifest Document No. <b>018</b>	3. Page <b>1</b>	Information in the shaded area is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE. NEWARK, N.J. 07109</b>		4. Generator's Phone <b>201-445-3312</b>	5. US EPA ID Number	6. State Manifest Document No. <b>NJA 138019</b>	7. State Generator ID
6. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT, INC.</b>		7. Transporter 1 Phone <b>201-445-3312</b>	8. US EPA ID Number	9. State Transporter ID	10. Transporter's Phone
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT, NEW JERSEY 700 LISTON AVE. NEWARK, N.J. 07105</b>		10. US EPA ID Number	11. State Facility ID	12. Facility's Phone <b>201-445-3312</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	13. Total Quantity	14. Unit WVVol	15. Waste No.
a. <b>NON-HAZARDOUS PER U.S. DOT DYE WASTE WATER</b>		<b>4011</b>	<b>1100101010</b>	<b>5</b>	<b>X900</b>
b. <b>THIS IS MAIN DYE WASTE WATER WATER</b>					
c. <b>WATER</b>					
16. Additional Descriptions for Materials Listed Above <b>200 L - Hydrolytic, 1 liter - 2 - Nitro Acetic acid</b>		K. Handling Codes for Wastes Listed Above <b>SOD H01</b>			
17. Special Handling Instructions and Labels (Formaldehyde) <b>DECAL # 12852</b>		<b>WASTE FRAGILE 30612 - *PT K-3333</b>			
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 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 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.					
Printed/Typed Name <b>HAROLD E. SULLIVAN</b>		Signature <i>Harold E. Sullivan</i>		Month Day Year <b>10/21/1992</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>FRANK T. BARONE</b>		Signature <i>Frank T. Barone</i>		Month Day Year <b>10/21/1992</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>Items (4), (9), (10) &amp; 15 omitted per discussion with Harold Sullivan 2/20/92. # 13 amended to 4883</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>ANISHA C. PERAZ</b>		Signature <i>Anisha C. Peraz</i>		Month Day Year <b>10/29/92</b>	

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

*type info*

Form Approved OMB No. 2050-0039

HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MJD110181661173718889	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by 17:27(d)
Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC 25 RIVERSIDE AVE NEWARK, N.J. 07104		A. State Manifest Document Number NJA 1378946		B. State Generator's ID No. SI-MEN	
Phone (201) 485-3212		C. State Trans. ID No. NJ 10181661173718889		D. Transporter's Phone (201) 365	
Company Name WASTE MANAGEMENT NEW JERSEY		E. State Trans. ID No.		F. State Facility ID No.	
Name and Site Address WASTE MANAGEMENT OF NEW JERSEY R AVE. N.J. 07105		G. State Facility ID No.		H. State Facility Address	
10. US EPA ID Number		11. US EPA ID Number		12. Containers	
				No. Type	
HAZARDOUS DYE WASH WATER		Regulated by 49-CER		1010 11 0101010 6 X 9 10 10	
WATER - 65 70 70 76					
Materials Listed Above		K. Handling Codes for Waste (date)			
NITRUM ACETATE 107					
NITRUM SULFATE 117					
ACID 147					
ORDER # A-33808		PROFILE # K-32692		CK-32692	
Certification: I hereby declare that the contents of this consignment are fully and accurately described above by name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway, air, rail, water, and national government regulations.		Signature		Month Day Year	
Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Signature Space		Signature		Month Day Year	
Certification of receipt of hazardous materials covered by this manifest except as noted in Item 12.		Signature		Month Day Year	

845340144

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES



State of New Jersey  
Department of Environmental Protection  
Division of Hazardous Waste Management  
Manifest Section 1

CN 028, Trenton, NJ 08625

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In case of an emergency or spill immediately call the state the emergency occurred in and J. Dept. of Environmental Protection, (609) 292-5560 (Day), (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJDA1081616173700009	2. Manifest Document No. 22	3. Page No. 1	4. Information in the shaded area is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC 29-75 RIVERSIDE AVE NEWARK NJ 07104		5. State Manifest Document Number NJ A 1378945		6. State Generator ID	
4. Generator's Phone (201) 485-3212		7. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT INC		8. State Trans. ID SP 1930	
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT INC		6. Transporter 1 US EPA ID Number NJDA099202681		9. State Trans. ID SP 1930	
7. Transporter 2 Company Name MANAGEMENT		8. Transporter 2 US EPA ID Number		10. State Trans. ID	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTE AVE. NEWARK N.J. 07102		10. Facility US EPA ID Number NJDA0892116790		11. State Facility ID	
11. US DOT Descriptors (including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a	NON-HAZARDOUS PER U.S. DOT DYE WASTE WATER	0101	11051000	G X	9101
b	NOT REGULATED BY 41 CFR				
c					
d					
16. Additional Descriptions for Materials Listed Above ACETIC ACID SULFURIC ACID		17. Handling Codes for Wastes Listed Above S2 H01			
18. Special Handling Instructions and Additional Information DECAL # 12852		19. WASTE TRUCK # K 32012			
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, packaged, 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 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.					
Printed/Typed Name HAROLD E SULLIVAN		Signature <i>[Signature]</i>		Month Day Year 10 21 91	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name MIKE MAGNIZ		Signature <i>[Signature]</i>		Month Day Year 10 22 91	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
845340145					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name SUE...		Signature <i>[Signature]</i>		Month Day Year 10 22 91	



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-

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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ081661737100110	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE, BLDG. 12, NEWARK, NJ 07104</b>				A. State Manifest Document Number <b>NJA 1379017</b>	
4. Generator's Phone (201) 465-3212		5. Transporter 1 Company Name <b>Chemical Waste Management INC.</b>		6. US EPA ID Number NJ0809216790	B. State Generator's ID <b>SAME</b>
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVE., NEWARK, NEW JERSEY 07105</b>	10. US EPA ID Number NJ0809216790
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM a. <b>NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR</b>				12. Containers No. Type	13. Total Quantity
b. CONTAINS WATER - 65 to 70%				14. Unit Wt/Vol	15. Waste No.
J. Additional Descriptions for Materials Listed Above AMMONIUM ACETATE - 10% AMMONIUM SULFATE - 11% ACETIC ACID - 14% AMINES - 10%				K. Handling Codes for Wastes Listed Above S02/H01	
15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION WORK ORDER NO. <b>A-33808</b> PROFILE NO. <b>K32532</b> DECAL NO. <b>20257</b>					
15. 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. 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 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.					
Printed/Typed Name <b>Harold E. Sullivan</b>		Signature <i>[Signature]</i>		Month Day Year <b>10/31/92</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name <b>Vernon B. Hiles</b>		Signature <i>[Signature]</i>		Month Day Year <b>10/31/92</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>System 12 corrected to 2435</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name <b>[Name]</b>		Signature <i>[Signature]</i>		Month Day Year <b>1/21/93</b>	

In case of an emergency or spill immediately call the state emergency number (609) 292-5650 (Day) (609) 292-7172 (Night) N.J. Dept. of Environmental Protection.











State of New Jersey  
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In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 351606617575011	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE, BLDG.17, NEWARK, NJ 07104</b>				A. State Manifest Document Number <b>NJA 0869033</b>	
4. Generator's Phone (201) 485-3212				B. State Generator's ID <b>SAME</b>	
5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC.</b>		6. US EPA ID Number		C. State Trans. ID <b>61093111</b>	
7. Transporter 2 Company Name <b>SAME</b>		8. US EPA ID Number		D. Transporter's Phone <b>201-463-2121</b>	
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVE. NEWARK NJ 07102</b>		10. US EPA ID Number		E. State Trans. ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM <b>NON-HAZARDOUS DYE WASHWATER NOT REGULATED BY 49CFR</b>				12. Containers No. Type	13. Total Quantity Unit (Wt/Vol) Waste No.
14. Additional Descriptions for Materials Listed Above <b>WATER 95.54 to 98.05 2,2'-[[4-2(Hydroxyethyl)Amino]-2-Nitrophenyl]Imino]Diethanol THIS IS A HAIR DYE HC-BLUE NO.2</b>				K. Handling Codes for Wastes Listed Above <b>a. 500/101</b>	
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. 34070 WASTE PROFILE NO. K-32525 DRCAL NO. 12863</b>					
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 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 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.					
Printed/Typed Name <b>HAROLD E. GULLIVAN</b>			Signature		Month Day Year <b>10/26/95</b>
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>LUKE DATTENBERG</b>			Signature		Month Day Year <b>10/26/95</b>
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space <b>913 amended to 4604</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name <b>WISAT POITON</b>			Signature		Month Day Year <b>10/26/95</b>



State of New Jersey  
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Form Approved. OMB No. 2050-0039. Expires 9-30-94

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 028 1 03 5 01 73 70 3 1	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104</b>				A. State Manifest Document Number <b>NJA 1379022</b>	
4. Generator's Phone ( )				B. State Generator's ID	
5. Transporter 1 Company Name <b>SAMB</b> 433-3212				C. State Trans. ID	
6. US EPA ID Number				D. Transporter's Phone ( )	
7. Transporter 2 Company Name <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY</b>				E. State Trans. ID	
8. US EPA ID Number				F. Transporter's Phone ( )	
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY 100 LISTER AVENUE NEWARK, NEW JERSEY 07105</b>				G. State Facility's ID	
10. US EPA ID Number				H. Facility's Phone ( )	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <b>NON-HAZARDOUS DYE WASTE WATER NOT REGULATED BY 49CFR</b>		1	25	gals	1010
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above <b>2,2'-[[4-2[[Hydroxyethyl]Amino]-2-Nitrophenyl]Imino]Diethanol This is a Hair Dye HC-BLUE NO. 2</b>			K. Handling Codes for Wastes Listed Above		
a.			b.		
c.			d.		
16. Special Handling Instructions and Additional Information <b>WORK ORDER NO. 1-35022 WASTE PROFILE NO. K-32525 DEPAL NO. 12863</b>					
17. 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. 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 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.					
Printed/Typed Name <b>David E. Sullivan</b>		Signature <i>David E. Sullivan</i>		Month Day Year <b>10/4/14/92</b>	
18. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>845340150</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month Day Year	

NJ 1379022



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

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and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)  
In case of an emergency or spill immediately call the state the emergency occur

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <u>071040705</u>		Manifest Document No. <u>0010</u>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, Newark, NJ 07104</b>					A. State Manifest Document Number <b>NJA 1379023</b>			
4. Generator's Phone (201) <u>485-3312</u>		5. Transporter 1 Company Name <b>IRC</b>		6. US EPA ID Number		B. State Generator's ID <b>SI-ME</b>		
7. Transporter 2 Company Name <del>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY</del>					C. State Trans. ID <u>18 1033 31</u>			
8. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVENUE NEWARK, NEW JERSEY 07104 0705</b>		9. US EPA ID Number <u>071040705</u>		10. US EPA ID Number		D. Transporter's Phone (201) <u>465-2121</u>		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM					12. Containers No. Type		13. Total Quantity Unit Wt/Vol Waste No.	
a. <b>NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR</b>					66		500 500 500 500	
b.								
c.								
d.								
CONTAINS WATER - 65 to 73%								
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above			
a. <b>AMMONIUM ACETATE</b> - 108					SOD/10			
b. <b>AMMONIUM SULFATE</b> - 113								
c. <b>ACETIC ACID</b> - 143								
d. <b>AMINES</b> - 108								
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. A-3000 24008 PROFILE NO. K32592</b> <b>DECAL NO. 12850</b>								
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 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 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.								
Printed/Typed Name <b>HAROLD E. SULLIVAN</b>				Signature <i>[Signature]</i>		Month Day Year <b>11/21/92</b>		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Vernon Battles</b>				Signature <i>[Signature]</i>		Month Day Year <b>10/12/11/92</b>		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year		
19. Discrepancy Indication Space <b>845340151</b> <i>[Handwritten: 13 Nonhazardous to 3073]</i>								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>[Handwritten Name]</b>								
Signature <i>[Signature]</i>				Signature <i>[Signature]</i>		Month Day Year <b>11/21/92</b>		



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-

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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 0710 88 6 17 37 0 0 11		Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104</b>					A. State Manifest Document Number <b>NJA 137802</b>	B. State Generator's ID
4. Generator's Phone (201) 495-3212		5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT NJ</b>		6. US EPA ID Number II DD 09 9 20 26 8 1	C. State Trans. ID	D. Transporter's Phone
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Trans. ID		
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY 100 LISTER AVENUE NEWARK, NEW JERSEY 07105</b>					10. US EPA ID Number	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM					12. Containers No.	13. Total Quantity
a. <b>NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY RCRA</b>					14. Unit Wt/Vol	15. Waste No.
b. <b>WATER 96.58 to 98.08</b>					K. Handling Codes for Wastes Listed Above	
J. Additional Descriptions for Materials Listed Above <b>2,3'-[[4-2[HYDROXYETHYL]Aminol-2-Nitrophenyl]Dino]Diethanol This is a Hair Dye BC-BLUE NO. 2</b>						
15. Special Handling Instructions and Additional Information WORK ORDER NO. <u>A-36009</u> WASTE PROFILE NO. <u>X-32525</u> DECAL NO. <u>12552</u>						
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 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 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.						
Printed/Typed Name <b>Karold S. Sullivan</b>				Signature <i>Karold S. Sullivan</i>		Month Day Year 9 14 88
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Herbert D. Dawson</b>				Signature <i>Herbert D. Dawson</i>		Month Day Year 9 14 88
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year
19. Discrepancy Indication Space						<b>845340152</b>
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name				Signature		Month Day Year

In case of an emergency or spill immediately call the state the emergency occurred in: N.J. Dept. of Environmental Protection. (609) 292-5550 (Day) (609) 292-7172 (Night)



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

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In case of an emergency or spill immediately call the state emergency occurrence and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 0210060173700010	Manifest Document No.	2. Page 1 of	Informa No. 2050-0039. Expires 9-30-'89. Not valid in the spaced areas required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104</b>				A. State Manifest Document Number <b>NJA 13 9020</b>	
4. Generator's Phone (201) 485-3212		5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT INC.</b>		B. State Generator's ID Number <b>SAME</b>	
6. Transporter 1 US EPA ID Number IL D 0992021681		7. Transporter 2 Company Name		C. State Trans. ID. 510	
8. Transporter 2 US EPA ID Number		9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVENUE NEWARK, NEW JERSEY 07105</b>		D. Transporter's Phone (201) 465-2123	
10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		E. State Trans. ID. 201465-2123	
12. Containers No. Type		13. Total Quantity		14. Unit (Wt/Vol) Waste No.	
a. NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR		65 to 70A		6 3 1 7 7 0 5 0 0 0 0 0 X 3 0 0	
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
a. AMMONIUM ACETATE 100		b. AMMONIUM SULFATE 110		c. ACETIC ACID 140	
d. AMINES 100					
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. A36087 PROFILE NO. K-32692 DECAL NO. 90257</b>					
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 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 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.					
Printed/Typed Name <b>HAROLD V. SULLIVAN</b>		Signature <i>[Signature]</i>		Month Day Year 1 7 1 7 9	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>MANUEL PEREIRA</b>		Signature <i>[Signature]</i>		Month Day Year 1 0 2 8 9	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>SA 13 MANIFEST TO 44001</b> <span style="float: right;"><b>845340153</b></span>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>WALTER C. ROBERT</b>					
Signature <i>[Signature]</i>		Signature <i>[Signature]</i>		Month Day Year 1 0 2 8 9	



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

845340154

Form Approved OMB No. 2050-0039 Expires 9-90

Please type or print in block letters. (Form designed for use on 11x17 (12-pitch) typewriter.)

In case of an emergency or spill immediately call the state emergency number for the N.J. Dept. of Environmental Protection, (609) 325-5560 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 01010961617319010970	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104</b>			A. State Manifest Document Number <b>NJA 1378947</b>		B. State Generator's ID
4. Generator's Phone (201) 4953212			C. State Trans. ID		D. State Generator's ID
5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT INC.</b>			E. State Trans. ID		F. State Generator's ID
7. Transporter 2 Company Name			8. US EPA ID Number		G. State Facility's ID
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY, Inc. 100 LISTER AVENUE NEWARK, NEW JERSEY 07105</b>			10. US EPA ID Number		H. Facility's Phone (201) 465-0100
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. <b>NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR</b>			0102	015101010	G X 9 0 10
b. <b>CONTAINS WATER - 65% to 70%</b>					
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
a. <b>AMMONIUM ACETATE - 108</b>			a. <b>502/101</b>		
b. <b>AMMONIUM SULFATE - 114</b>					
c. <b>ACETIC ACID - 148</b>					
d. <b>AMINES - 109</b>					
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO.: A-37113</b> <b>PROFILE NO.: 7-2259-247</b> <b>DECAL NO.: 12863</b>					
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 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 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.					
Printed/Typed Name <b>HAROLD E. SULLIVAN</b>			Signature <i>Harold Sullivan</i>		Month Day Year 12 5 92
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature <i>Jack Fanty</i>		Month Day Year 05 10 92
Printed/Typed Name <b>Jack Fanty</b>			Signature		Month Day Year
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Month Day Year
Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space <b>#13 amended to 5072 yellow</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name <b>T. W. O'NEAL</b>			Signature <i>T. W. O'Neal</i>		Month Day Year 12 5 92



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

845340155

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.)

In case of an emergency or spill immediately call the state the emergency occurred in - the N.J. Dept. of Environmental Protection. (609) 292-5566 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 001 006 617 37 000 011	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104</b>			A. State Manifest Document Number <b>NJA 1378948</b>		
4. Generator's Phone (201) 465-3212			B. State Generator's ID		
5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT INC.</b>			C. State Trans. ID <b>same</b>		
7. Transporter 2 Company Name			D. Transporter's Phone		
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY, INC. 100 LISTER AVENUE NEWARK, NEW JERSEY 07105</b>			E. State Trans. ID <b>201-465-3121</b>		
10. US EPA ID Number			F. Transporter's Phone		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM			G. State Facility's ID		
12. Containers No. Type			13. Total Quantity Unit Wt/Vol Waste No.		
a. NON-HAZARDOUS DYE WASTE WATER NOT REGULATED BY 49CFR			14. 1 12 0 30 0 3 X 9 0 0		
J. Additional Descriptions for Materials Listed Above <b>2,2'-[[4-[2-(Hydroxyethyl)Amino]-2-Nitrophenyl]Emino]Disthano] THIS IS A HAIR DYE DC HEUR NO. 2</b>			K. Handling Codes for Wastes Listed Above <b>50/10</b>		
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. 37121 WASTE PROFILE NO. K-3225 DECAL NO. 12850</b>					
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 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 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.					
Printed/Typed Name <b>ROBERT R. PHILLIPAN</b>			Signature <i>Robert R. Phillipan</i>		Month Day Year <b>10/5/1992</b>
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>MIKE MAENZA</b>			Signature <i>Mike Maenza</i>		Month Day Year <b>10/5/1992</b>
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>MARISOL CRUZ</b>					
Printed/Typed Name			Signature <i>Marisol Cruz</i>		Month Day Year <b>11/17/1991</b>

4-9794-001 (REV. 8/88)



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

845340156

3,886 gals received

Please type or print in block letters. (Form designed for use on 8 1/2" (12-pitch) typewriter.)

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

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7772 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ01108616173702710		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Chemical Compounds Inc 28-75 Riverside Ave. Newark NJ 07104		4. Generator's Phone (201) 425-9111		5. Transporter 1 Company Name Oldover Corporation		6. US EPA ID Number VA101041011519436		7. Transporter 2 Company Name	
8. Designated Facility Name and Site Address Oldover Corporation 47 RK 652 ARVON VA 23004		9. US EPA ID Number VA1010984443473		10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type	
13. Total Quantity 4000		14. Unit Wt/Vol G		15. Waste No. D001 F003		16. Additional Descriptions for Materials Listed Above METHANOL 40% XYLENE 5% ISOPROPYL ALCOHOL 40% ETHYL ACETATE 5%		17. Handling Codes for Wastes Listed Above S-02, T-18 Lightwt Aggregate not a kilo	
18. Special Handling Instructions and Additional Information PROFILE NUMBER 104B PC3-CCI729		19. EMERGENCY RESPONSE# (201) 485-3212 GUIDE# 27, TRAILER BECAL #45249 PRODUCT 13263		20. 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. 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 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.		21. Printed/Typed Name HAROLD E. SULLIVAN		22. Signature [Signature]	
23. Printed/Typed Name GEORGE PENZER		24. Signature [Signature]		25. Month Day Year 11/14/92		26. Printed/Typed Name		27. Signature	
28. Printed/Typed Name Marie C. Christian		29. Signature [Signature]		30. Month Day Year 11/14/92		31. Discrepancy Indication Space		32. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.	







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

10-14-93

1

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

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D 108661737	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Chemical Compounds 2975 Riverside Avenue Newark Attn: Peggy Schroeder NJ 07104		4. Generator's Phone ( ) 201-485-1717		A. State Manifest Document Number AR 06005	
5. Transporter 1 Company Name Tri-State Motor Transit Co.		6. US EPA ID Number M O D 0 9 5 0 3 8 9 9 8		B. State Generator's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID	
9. Designated Facility Name and Site Address Rineco 1007 Vulcan Rd.-Haskell Benton, AR 72015		10. US EPA ID Number A R D 9 8 1 0 5 7 8 7 0		D. State Facility's ID 501778-9089	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Waste Chloroform Mixture 6.1 UN1888 PGII		1	DM	55	G
b. Non-Regulated Material (Motor Oil)		1	DM	55	G
c. Non-Regulated Material (Dye)		3	DM	165	G
15. Special Handling Instructions and Additional Information New Jersey Transporter Hazardous ID # DEPE 50083 New Jersey Trailer ID # <u>DEPE 50083</u>		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 labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state 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 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.		17. Handling Codes for Waste Described Above EMERGENCY RESPONSE INFORMATION Peggy Schroeder 201-485-1717	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: ALBERTO CELLERI Signature: <i>[Signature]</i> Month Day Year: 12/1/93		18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: James M. Pearson Signature: <i>[Signature]</i> Month Day Year: 12/1/93		19. Discrepancy Indication Space 845340158	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest as noted in item 10. Printed/Typed Name: GARY VICE Signature: <i>[Signature]</i> Month Day Year: 12/1/93					

AR-8-83

GENERATOR

TRANSPORTER

SITE

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.  
 NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

**NON-HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No. NJ-D1-0-8-66-1-7-371		Manifest Document No. 06581	2. Page 1 of 1	
3. Generator's Name and Mailing Address Chemical Compounders 29-75 Riverside Ave. Newark, N.J. 07104				
4. Generator's Phone (201) 485-3211				
5. Transporter 1 Company Name Laidlaw Environmental Services		6. US EPA ID Number M-DD-9-8-05-5-46-5-3		
7. Transporter 2 Company Name		8. US EPA ID Number		
9. Designated Facility Name and Site Address Laidlaw Environmental Services 3527 Whiskey Bottom Road Laurel, Md. 20724		10. US EPA ID Number M-DD-9-8-0-5-5-46-5-3		A. Transporter's Phone (301) 953-9583
				B. Transporter's Phone
				C. Facility's Phone 301-953-9583
11. Waste Shipping Name and Description		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. NON-HAZARDOUS WASTE (NON-REGULATED MATERIAL)		13	715	Gal
b.				
c.				
d.				
D. Additional Descriptions for Materials Listed Above PROCESS WATER			E. Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information PROFILE NO. <u>6-CEM-001</u>  In case of Emergency contact: CHEM-TREC 1-800-424-9300				
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.				
Printed/Typed Name ALBERTO CELLERI		Signature <i>Alberto Celleri</i>		Month Day Year 4 12 94
17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name ERIC BLOTTENBERGER		Signature <i>Eric Blottenberger</i>		Month Day Year 6 4 94
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space  845340159				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19. SEC A SEC 7 CORRECTED SEC. 11, Ln 9 - CORRECTED AT LAUREL FACILITY 4/15/94 AT LAUREL FACILITY 4/15/94				
Printed/Typed Name TIMOTHY KESLAR		Signature <i>Timothy Keslar</i>		Month Day Year 10 4 94

GENERATOR

TRANSPORTER

FACILITY

ORIGINAL RETURN TO GENERATOR



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

*Shipped 5-27-94  
8:00  
(let for '94)*

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address General Dispensing, Inc. 19 Riverside Ave. Morwick, NJ 08851				A. State Manifest Document Number <b>NJA 1903150</b>	
4. Generator's Phone ( )		6. US EPA ID Number		B. State Generator's ID (Gen. Site Address)	
5. Transporter 1 Company Name Oldover Corporation		8. US EPA ID Number		C. State Trans. ID-NJDEPE Decal No.	
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone ( )	
9. Designated Facility Name and Site Address Oldover Corporation 901 S. Ocean Blvd. Avenel, NJ 07001				E. State Trans. ID-NJDEPE Decal No.	
				F. Transporter's Phone ( )	
				G. State-Facility's ID	
				H. Facility's Phone ( )	
11. US DOT Description (including Proper Shipping Name, Hazard Class or Division, HM ID Number and Packing Group)		12. Containers		13. Total Quantity	
a. 30 Waste Disposal... (Hazardous Waste)		No. Type		Unit Waste No.	
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Isopropyl Alcohol, Methyl Ethyl Trichloroacetate 5/1, T		K. Handling Codes for Wastes Listed Above			
b.		a.		c.	
15. Special Handling Instructions and Additional Information INC		b.		d.	
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 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 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.					
Printed/Typed Name <b>ALBERTO CELLERI</b>		Signature		Month Day Year 05 27 94	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name D.K. ...		Signature		Month Day Year 05 27 94	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space  <b>845340160</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172

GENERATOR

TRANSPORTER

FACILITY



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

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>NJD108661737</b>	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Chemical Compounds 2975 Riverside Ave. Newark</b>			Attn: <b>Peggy Schroeder NJ 07104</b>		A. State Manifest Document Number <b>AR 708983</b>
4. Generator's Phone <b>201-485-1717</b>	5. Transporter 1 Company Name <b>Maumee Express</b>		6. US EPA ID Number <b>NJD19181616073810</b>	B. State Generator ID No. <b>908-247-0320</b>	
7. Transporter 2 Company Name			8. US EPA ID Number	C. State Transporter ID No.	
9. Designated Facility Name and Site Address <b>Rineco 1007 Vulcan Rd. - Haskell Benton, AR 72015</b>			10. US EPA ID Number <b>ARD981057870</b>		D. Facility Phone <b>501-778-9089</b>
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. <b>7</b> Type <b>DM</b>	13. Total Quantity <b>1.825G</b>	14. Unit Wt/Vol
a. <b>Non-Regulated Material (Dye)</b>					Waste No. <b>NON-RCRA</b>
b.					
c.					
d.					
14. Additional Descriptions for Materials Listed Above <b>9309-8935</b>			15. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION Peggy Schroeder 201-485-1717</b>		
15. Special Handling Instructions and Additional Information			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 labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state 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 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.		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <b>Daniel Heath</b>		Month Day Year <b>10/7/12/94</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
19. Discrepancy Indication Space <b>845340161</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest as noted in Item 19.		Signature <b>RAY C. PEAGAN</b>		Month Day Year <b>07/15/94</b>	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.



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

*Shipped 8-19-94*  
*(Ind for 94)*

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039 Expires 9-30-95

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>NJD10866173705733</b>	Manifest of 1	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE. NENARK, N.J. 07104</b>			A. State Manifest Document Number <b>NJA 1903133</b>		
4. Generator's Phone (201) 485-3211			B. State Generator's ID (Gen. Site Address) <b>SAHE</b>		
5. Transporter 1 Company Name <b>OLDOVER CORP.</b>		6. US EPA ID Number <b>VAD040157436</b>	C. State Trans. ID-NJDEPE <b>7157</b> Decal No. <b>53098</b>		
7. Transporter 2 Company Name		8. US EPA ID Number	D. Transporter's Phone (804) 718-7781		
9. Designated Facility Name and Site Address <b>OLDOVER CORP. RT. 1 STATE RD. 652 ARYONIA, VA. 23004</b>		10. US EPA ID Number <b>VAD098443443</b>	E. State Trans. ID-NJDEPE Decal No.		
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) a. <b>X</b> <b>KG WASTE FLAMMABLE LIQUID, N.O.S., 3, (METHANOL, TOLUENE) UN1993, PG II</b>			12. Containers No. <b>001</b> Type <b>TTG</b>	13. Total Quantity <b>1850G</b>	14. Unit Wt/Vol <b>F 001 F 003 F 005</b>
J. Additional Descriptions for Materials Listed Above <b>METHANOL, TOLUENE, ISOPROPYL ALCOHOL, WATER, AND LIT 1,1,1-TRICHLOROETHANE LIQ.</b>			K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information <b>EMERGENCY PHONE (201) 485-3211</b> <b>GUIDE BOOK ID-27</b>					
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 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 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.					
Printed/Typed Name		Signature		Month Day Year <b>08/19/94</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year <b>08/17/94</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>845340162</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172





State of New Jersey  
Department of Environmental Protection and Energy  
Hazardous Waste Regulation Program  
Manifest Section  
CN 028, Trenton, NJ 08625-0028

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

Use type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ D 1 0 8 6 6 1 7 3 7		Manifest Document No. 2 1 4 3 4		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDERS 29-75 RIVERSIDE AVENUE BUILDING 17 NEWARK, NJ 07102</b>						A. State Manifest Document Number <b>NJA 1787118</b>			
4. Generator's Phone (908) 485-1717						B. State Generator's ID <b>S.H.M.C.</b>			
5. Transporter 1 Company Name <b>FRYBOLD CARTAGE INC.</b>						C. State Trans. ID <b>0265 64461</b>			
7. Transporter 2 Company Name						D. Transporter's Phone			
8. US EPA ID Number						E. State Trans. ID			
9. Designated Facility Name and Site Address <b>SYSTECH ENVIRONMENTAL 11397 COUNTY ROAD 176 PAULDING, OH 45879</b>						10. US EPA ID Number			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM						12. Containers No. Type		13. Total Quantity Unit Waste No.	
a. <b>RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. X (HEPTENE, XYLENE), J. UN1993, PG II</b>						0 0 1 1		9210	
b. <i>4% Heptane</i>									
c. <i>12% Xylene</i> <i>16% Heptane</i>									
d. <i>IPA (water) 25%</i>									
J. Additional Descriptions for Materials Listed Above <b>PROFILE #VA10590 ERG#27</b>						K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information <b>EMERGENCY CONTACT: CHEMTREC 1-800-424-9300 CALLER MUST IDENTIFY VAN WATERS &amp; ROGERS AS SHIPPER.</b>						<i>PLATE - T312-MT WJ.</i>			
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 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 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.									
Printed/Typed Name <b>ARTURO CELLERI</b>						Signature <i>Arturo Celleri</i>		Month Day Year <b>10 8 21 95</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>BILL MICHAEL</b>						Signature <i>Bill Michael</i>		Month Day Year <b>10 8 21 95</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space <b>845340164</b>									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>LISA A. MAINZ</b>						Signature <i>Lisa Mainz</i>		Month Day Year <b>10 8 21 95</b>	

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172





845340165

## 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

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#### 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 supplant any legal duty you may have to provide a safe premises, workplace, product or operation.

Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 1

## INTRODUCTION

On October 3, 1995 an Occupational Health Survey was conducted at the given location to evaluate employee exposure to various airborne contaminants. 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 revealed that on the day of the survey, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminants.

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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Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 2

## 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 ( $\text{mg}/\text{M}^3$ ) 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-nitroaniline (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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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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Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 7

## APPENDIX II

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**PLEASE READ CAREFULLY**

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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:

1. 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.
2. 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.

Substance	Units	OSHA Permissible Exposure Level (PEL) <sup>1</sup>			ACGIH Threshold Limit Value (TLV) <sup>2</sup>		
		8-Hr. <sup>3</sup>	STEL <sup>4</sup>	Ceiling <sup>5</sup>	8-Hr. <sup>3</sup>	STEL <sup>4</sup>	Ceiling <sup>5</sup>
ethylene oxide <sup>6</sup>	ppm	1	-	-	1,A2	-	-
methanol (skin)	ppm	200	-	-	200	250	-
nitric acid	ppm	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 Health 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).  
Action level 0.5 ppm.

- \*\*\*\*\* A1 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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Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 9

## 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.

**845340173**

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FILLED

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 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.

FIRST: The name of the corporation is:  
CHEMICAL COMPOUNDS, INC.

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 Jersey Statutes Annotated, Title 14A, entitled "Corporations, General"

FIFTH: The name and post office addresses of

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the incorporators and the number of shares 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:

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

SIXTH: The period of existence of this corporation 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.

EIGHTH: The number of Directors constituting the first Board of Directors shall be two and shall be:

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. Garrison*  
\_\_\_\_\_  
GEORGE L. GARRISON                      L.S.

WITNESS:

*Janice Bencella*  
\_\_\_\_\_





# **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 Giannotti  
jg./JG  
c.c: AC/SG

**866300001**

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:

	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	_____	_____
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.
- 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

State of New Jersey :

County of Essex :

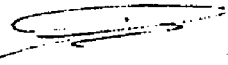
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, 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.

Alberto Celleri  
NAME (print or type)

President  
TITLE (print or type)

  
SIGNATURE

Sworn to before me this  
day of 29<sup>th</sup> Jan., 1997

  
Notary Public

TERESA M. COSTA  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Aug. 16, 1993

866300009

**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.)

**866300010**

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

Hazardous Material	Yes	No
2,3,7,8 Tetrachlorodibenzo-p-dioxin or other Dioxin Compounds		X
Acetic Acid	X	
Adipic Acid	X	
Aniline	X	
Benzene	X	
Benzo(a)anthracene		X
Benzoic Acid	X	
Benzy Chloride		X
Butyl Benzyl Phthalate		X
Chlorobenzene	X	
Chloroethylene		X
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		X
Pyrene		X
Tetrachlorobenzene		X
Tetrachloroethane		X
Tetrachloroethylene	X	
Trichloroethane		X
Trichloroethylene		X
Toluene	X	
Xylene	X	

866300011



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

**REDACTED**

**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)**

**866300012**

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**REDACTED**

**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)**

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**866300013**

**REDACTED**

**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)**

**866300014**

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**REDACTED**

**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)**

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**866300015**

**REDACTED**

**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)**

**866300016**

**REDACTED**

**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)**

**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.)**

**866300017**

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:

<b>Name</b>	<b>Title</b>	<b>Description of Responsibility</b>
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

866300018

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 Arvonnia, VA 23004	Oldover Corporation P.O. Box 68 Rt. 1, State Rd. 652 Arvonnia, 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

866300019



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
Raw Materials  or  Laboratory Supplies	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
	Benzoic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
	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
	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
	Toluene	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 Data	By-Products found in the waste water stream: Aniline, Benzene, Benzoic Acid, Chlorobenzene, Chloroform, Ethyl Benzene, Methanol, Methylene Chloride Naphthalene, 2-Nitrophenol, Tetrachloroethylene, Toluene, Xylene, Lead, Zinc, Cyanide	55 gallon drum - Waste  400 - 4,000 gallon S/S Storage Tank  10,000 gallon S/S Storage Tank  5,000 gallon Tanker Trucks - Waste

866300020

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.

866300021

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.

866300022

- 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.

**866300023**

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.)

**866300024**

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
	Duso Chemical	173 Smith Street Poughkeepsie, N.Y. 12602
Adipic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	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
Toluene	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Xylenc	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901

866300025

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

Laboratory Material Name	Supplier's Name	Supplier's Address
Acetic Acid Adipic Acid Benzoic Acid Chloroform Methylene Chloride Methanol Toluene Xylene	PCI Scientific Supply, Inc.  J.T. Baker  Fisher Scientific	41 Plymouth Street Fairfield, N.J. 07004  89 Newbury Street Suite 103 Danvers, MA 01923  711 Forbes Avenue 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	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 44115
Methanol, Xylene Waste Flammable Liquids	Freehold Cartage Inc.	Systech Environmental 11397 County Rd. 176 Paulding, OH 45879

866300026

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 contaminants. 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 contaminants. 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.

**866300027**



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.

**866300028**

**D**

**866300029**



**DEED**

Industrial Development  
Associates

TO

Chemical Compounds, Inc.

Grantor.

Grantee.

Record and return to:

George Garrison, Esquire  
1715 Clifton Avenue  
Clifton, New Jersey 07015

866300030



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 1594.

Being further described as follows:

BEGINNING at a point where the Northeastly 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:

- (1) 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 feet 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; thence:
- (5) South 36 degrees 52 minutes 20 seconds West 79.00 feet to a point in the Northeastly boundary line of Lot B; thence:
- (6) Along said Northeastly boundary line of Lot B, South 52 degrees 17 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 Map of the City of Newark

866300032

The conveyance of the foregoing easement for ingress and egress is made expressly subject to the Grantor'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 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 (5%) percent of the cost of snow removal, guard service, and exterior janitorial and maintenance service attributable 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 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 premises 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 Grantee 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.

866300033

4-1986 215

**Promises by Grantor.** The Grantor promises that the Grantor has done (or act to encumber 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 rights 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 Grantor's proper corporate officers as of the date at the top of the first page. Its corporate seal is affixed



BY: INDUSTRIAL DEVELOPMENT ASSOCIATES  
INDUSTRIAL DEVELOPMENT CORPORATION  
General Partner

By: Anthony V. Pugliese, President

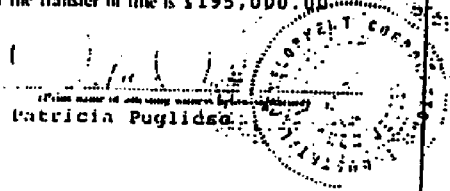
STATE OF NEW JERSEY, COUNTY OF ESSEX SS.

I CERTIFY that on July 1, 1986  
Patricia Pugliese

- personally came before me and this person acknowledged under oath, to my satisfaction, that:
- (a) this person is the secretary of Industrial Development Associates the corporation named in this Deed;
  - (b) this person is the attesting witness to the signing of this Deed by the proper corporate officer who is Anthony V. Pugliese, III the President of the corporation;
  - (c) this Deed was signed and delivered by the corporation as its voluntary act duly authorized by a proper resolution of its Board of Directors;
  - (d) this person knows the proper seal of the corporation which was affixed to this Deed;
  - (e) this person signed this deed to attest to the truth of these facts; and
  - (f) the full and actual consideration paid or to be paid for the transfer of title is \$195,000.00.

Signed and sworn to before me on July 1, 1986

Henry Papaz, an Attorney at Law of the State of New Jersey

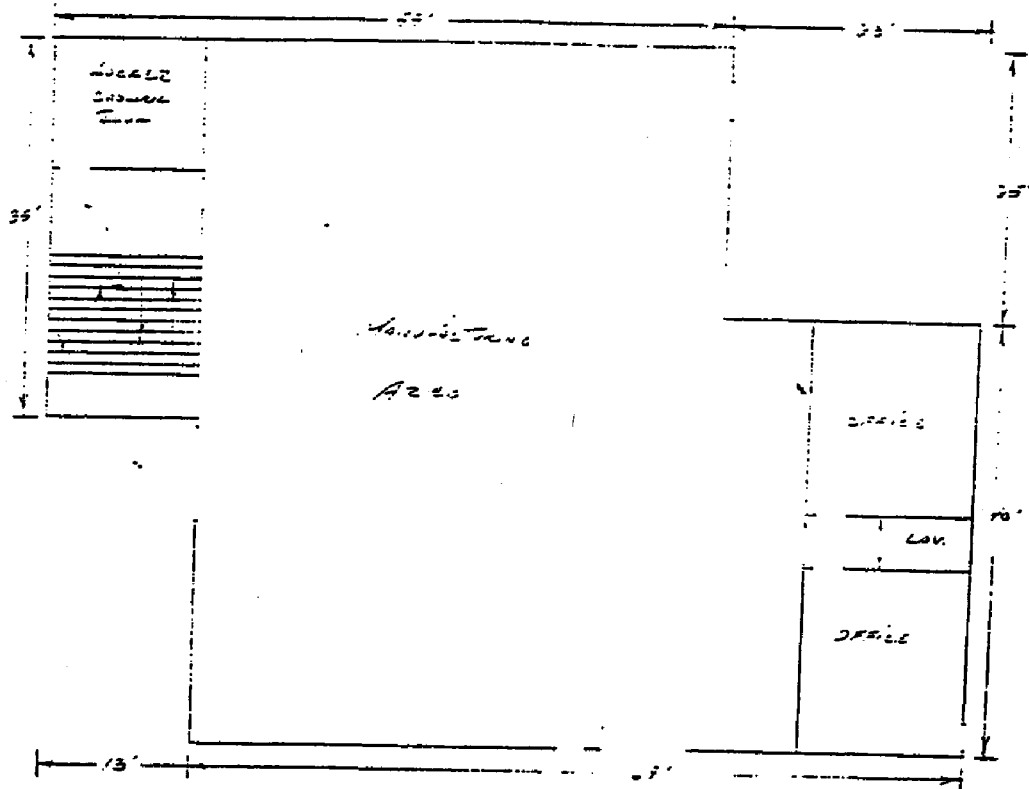


Patricia Pugliese

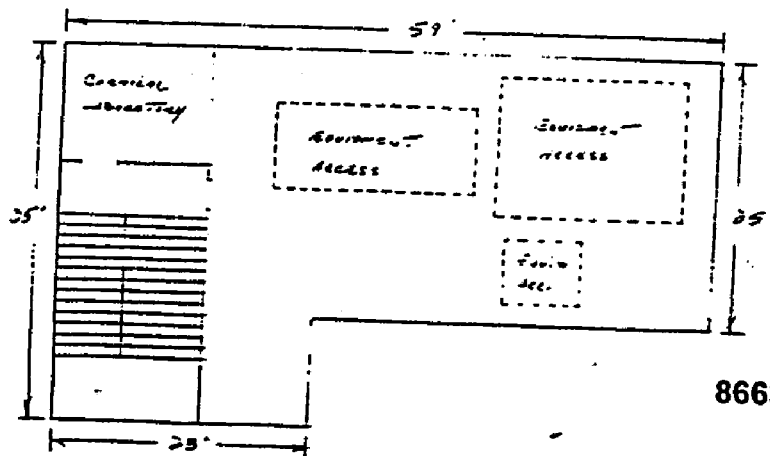
Prepared by: N.J.S.A. 46:15-11 (Print name of preparer below signature)

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DIAGRAM OF THE BUILDING



2nd fl



866300035





## CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park

29-75 Riverside Avenue • Newark, New Jersey 07104

201-735-2112

*END — Dec 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 covenant 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.

By

*Harold E. Sullivan*  
Harold E. Sullivan  
President

866300036

866300037



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE

I hereby acknowledge that you have filed a Notification of Hazardous Waste... at the address shown in the box below... The EPA... Reports that generators of hazardous waste, and owners and operators of treatment, storage and disposal facilities must file with EPA on all applications for Federal Hazardous Waste Permit, and other hazardous waste management reports and records required under Subtitle C of RCRA.

EPA Form 3000-12a (4-79)

866300038



**866300039**

PASSAIC VALLEY SEWERAGE COMMISSIONERS  
SEWER CONNECTION PERMIT

PERMIT #

20407122

(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.

[Redacted]

(herein, after referred to as the Permittee)  
is authorized to discharge from a facility located at

29-75 Riverside Avenue - Building #17

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.

EFFECTIVE DATE

07/20/92

EXPIRATION DATE

07/20/97

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Rev: 02/96

BY: EXECUTIVE DIRECTOR

866300040



**866300041**

**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 in-house 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) 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) Chloroform (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)

866300042

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)
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

866300043



ACCREDITED LABORATORIES, INC.  
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 3180  
 SAMPLE NUMBER 9508936  
 FILE 1A3540  
 CLIENT NAME CCI  
 FIELD ID NOAPA

MATRIX Aqueous  
 DILUTION FACTOR 10  
 DATE EXTRACTED \_\_\_\_\_  
 DATE ANALYZED 06/28/95  
 ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MOL	CAS #	COMPOUND	UG/L	MOL
107028	Acrolein	U	61	78875	1,2-Dichloropropane	U	4.0
107131	Acrylonitrile	U	66	10061015	cis-1,3-Dichloropropene	U	4.0
74873	Chloromethane	550 W	20	79016	Trichloroethene	U	4.0
74839	Bromomethane	300 W	20	71432	Benzene	960 W	4.0
75014	Vinyl Chloride	U	20	124481	Dibromochloromethane	U	4.0
75003	Chloroethane	U	20	79005	1,1,2-Trichloroethane	U	4.0
75092	Methylene Chloride	U	10	10061026	trans-1,3-Dichloropropene	U	4.0
67641	Acetone	24000 W	18	110758	2-Chloroethylvinylether	U	20
75150	Carbon Disulfide	U	4.0	75252	Bromoform	U	4.0
75694	Trichlorofluoromethane	U	4.0	591786	2-Hexanone	110	9.0
75354	1,1-Dichloroethene	U	4.0	108101	4-Methyl-2-pentanone	68	7.0
75343	1,1-Dichloroethane	U	4.0	127184	Tetrachloroethene	U	4.0
156605	trans-1,2-Dichloroethene	U	4.0	79345	1,1,2,2-Tetrachloroethane	U	6.0
67663	Chloroform	31 W	4.0	108883	Toluene	1500 W	5.0
107062	1,2-Dichloroethane	U	4.0	108907	Chlorobenzene	68 W	4.0
78933	2-Butanone	1800	4.0	100414	Ethylbenzene	26	10
71556	1,1,1-Trichloroethane	U	4.0	100425	Styrene	U	4.0
56235	Carbon Tetrachloride	U	4.0	1330207	m,p-Xylene	37 W	28
19054	Vinyl Acetate	U	8.0	95476	o-Xylene	250 W	21
74	Bromodichloromethane	U	4.0	156592	cis-1,2-Dichloroethane	U	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	101 %	76-114	OK
Toluene-d8	90 %	88-110	OK
Bromofluorobenzene	97 %	86-115	OK

J - Indicates compound concentration found below MOL.  
 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.

866300044

ACCREDITED LABORATORIES, INC.  
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 3180  
SAMPLE NUMBER 9508936  
DATA FILE 081194  
AGENT NAME CCI  
FIELD ID NOAPA

MATRIX Aqueous  
DILUTION FACTOR 50  
DATE EXTRACTED 06/28/95  
DATE ANALYZED 07/22/95  
ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
108952	Phenol	300 J	500	59507	4-Chloro-3-methylphenol	U	1000
95578	2-Chlorophenol	U	500	88062	2,4,6-Trichlorophenol	U	500
95487	2-Methylphenol	U	500	95954	2,4,5-Trichlorophenol	U	500
108394	3,4-Methylphenol	U	500	51285	2,4-Dinitrophenol	U	2500
88755	2-Nitrophenol	450 J	500	100027	4-Nitrophenol	U	2500
105679	2,4-Dimethylphenol	U	500	534521	4,6-Dinitro-2-methylphenol	U	2500
120832	2,4-Dichlorophenol	U	500	87865	Pentachlorophenol	U	2500
111444	bis(-2-Chloroethyl)Ether	U	500	121142	2,4-Dinitrotoluene	U	500
561731	1,3-Dichlorobenzene	U	500	84662	Diethylphthalate	U	500
106467	1,4-Dichlorobenzene	U	500	7005723	4-Chlorophenyl-phenylether	U	500
100516	Benzyl Alcohol	U	1000	86737	Fluorene	U	500
95501	1,2-Dichlorobenzene	U	500	100016	4-Nitroaniline	U	2500
108601	bis(2-Chloroisopropyl)ether	U	500	86306	N-Nitrosodiphenylamine	U	500
621647	N-Nitroso-Di-n-propylamine	U	500	101553	4-Bromophenyl-phenylether	U	500
67721	Hexachloroethane	U	500	118741	Hexachlorobenzene	U	500
98953	Nitrobenzene	74 JW	500	85018	Phenanthrene	U	500
78591	Isophorone	U	500	120127	Anthracene	U	500
65850	Benzoic Acid	U	2500	84742	Di-n-Butylphthalate	U	500
111911	bis(-2-Chloroethoxy)Methane	U	500	206440	Fluoranthene	U	500
20821	1,2,4-Trichlorobenzene	U	500	129000	Pyrene	U	500
203	Naphthalene	U	500	85687	Butylbenzylphthalate	U	500
106478	4-Chloroaniline	U	1000	91941	3,3'-Dichlorobenzidine	U	1000
37683	Hexachlorobutadiene	U	500	56553	Benzo(a)Anthracene	U	500
91576	2-Methylnaphthalene	U	500	117817	Bis(2-Ethylhexyl)Phthalate	U	500
77474	Hexachlorocyclopentadiene	U	500	218019	Chrysene	U	500
91587	2-Chloronaphthalene	U	500	117840	Di-n-octyl phthalate	U	500
88744	2-Nitroaniline	800 J	2500	205992	Benzo(b)fluoranthene	U	500
131113	Dimethyl Phthalate	U	500	207089	Benzo(k)fluoranthene	U	500
208968	Acenaphthylene	U	500	50328	Benzo(a)Pyrene	U	500
99092	3-Nitroaniline	870 J	2500	193395	Indeno(1,2,3-cd)Pyrene	U	500
83329	Acenaphthene	U	500	53703	Dibenzo(a,h)Anthracene	U	500
132649	Dibenzofuran	U	500	191242	Benzo(g,h,i)Perylene	U	500
606202	2,6-Dinitrotoluene	U	500	62759	N-Nitrosodimethylamine	U	500

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
Nitrobenzene-d5	42 %	35-114	OK
2-Fluorobiphenyl	49 %	43-116	OK
Terphenyl-d14	82 %	33-141	OK
Phenol-d5	42 %	10-94	OK
2-Fluorophenol	34 %	21-100	OK
2,4,6-Tribromophenol	30 %	10-123	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.  
3-Methylphenol and 4-Methylphenol can not be separated by the method applied

866300045



# 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: PVSC MONITORING  
Lab Case Number : 10950 - 2904

HC BLUE #2

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### VOLATILES

Method 624

Lab ID : 2904-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture: 100

Date Sampled : 12/26/95  
Time Sampled : 15:00  
Date Analyzed : 1/2/96

Compound	Conc. Q	MDL	Compound	Conc. Q	MDL
Chloromethane	< 10.0	10.0	Bromodichloromethane	< 10.0	10.0
Vinyl Chloride	< 10.0	10.0	2-Chloroethyl Vinyl Ether	< 10.0	10.0
Bromomethane	< 10.0	10.0	cis-1,3-Dichloropropene	< 10.0	10.0
Chloroethane	< 10.0	10.0	Toluene	< 10.0	10.0
Trichlorofluoromethane	< 10.0	10.0	trans-1,3-Dichloropropene	< 10.0	10.0
1,1-Dichloroethane	< 10.0	10.0	1,1,2-Trichloroethane	< 10.0	10.0
Methylene Chloride	< 20.0	20.0	Tetrachloroethane	< 10.0	10.0
trans-1,2-Dichloroethane	< 10.0	10.0	Dibromochloromethane	< 10.0	10.0
1,1-Dichloroethane	< 10.0	10.0	Chlorobenzene	< 10.0	10.0
Chloroform	18.8	10.0	Ethylbenzene	< 10.0	10.0
1,1,1-Trichloroethane	< 10.0	10.0	Total Xylenes	< 10.0	10.0
Carbon Tetrachloride	< 10.0	10.0	Bromoform	< 10.0	10.0
1,2-Dichloroethane	< 10.0	10.0	1,1,2,2-Tetrachloroethane	< 10.0	10.0
Benzene	< 10.0	10.0	1,3-Dichlorobenzene	< 10.0	10.0
Trichloroethane	< 10.0	10.0	1,4-Dichlorobenzene	< 10.0	10.0
1,2-Dichloropropane	< 10.0	10.0	1,2-Dichlorobenzene	< 10.0	10.0

### TOTAL CYANIDE

Method 335.2

Lab ID : 2904-001  
Client ID : 001  
Matrix/Units : Aqueous - mg/L  
Percent Moisture: 100

Date Sampled : 12/26/95  
Time Sampled : 15:00  
Date Analyzed : 1/2/96

Result

MDL

1.00

0.05

< 0.2

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

*Michael H. Lefin*  
Michael H. Lefin, 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

New York Certified Lab # 11402

866300046

01-15-1995 04:51PM FROM INTEGRATED ANALYTICAL LAB



# 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

HC-BLUE-F2

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

**MDL = METHOD DETECTION LIMIT** **< = LESS THAN THE MDL**

### SEMIVOLATILES - BASE NEUTRALS

Method 625

Lab ID : 2903-01  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture : 100

Date Sampled : 12/26/95  
Time Sampled : 15:00  
Date Analyzed : 1/11/96

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-phenylether	< 100		100
1,3-Dichlorobenzene	< 100		100	4-Nitroaniline	< 100		100
-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100		100
benzyl alcohol	< 100		100	1,2-Diphenylhydrazine/Azobenzene	< 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
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-Trichlorobenzene	< 100		100	Benazidine	< 100		100
Naphthalene	< 100		100	Pyrene	< 100		100
4-Chloroaniline	< 100		100	3,3'-Dimethylbenzidine	< 100		100
Hexachlorobutadiene	< 100		100	Butylbenzylphthalate	< 100		100
2-Methylphthalene	< 100		100	3,3'-Dichlorobenzidine	< 100		100
Hexachlorocyclopentadiene	< 100		100	Benzo[a]anthracene	< 100		100
2-Chlorophthalene	< 100		100	Chrysene	< 100		100
2-Nitroaniline	< 100		100	bis(2-Ethylhexyl)phthalate	< 100		100
Dimethylphthalate	< 100		100	Di-n-octylphthalate	< 100		100
2,6-Dinitrotoluene	< 100		100	Benzo[b]fluoranthene	< 100		100
Acenaphthylene	< 100		100	Benzo[k]fluoranthene	< 100		100
3-Nitroaniline	< 100		100	Benzo[a]pyrene	< 100		100
Acenaphthene	< 100		100	Indeno[1,2,3-cd]pyrene	< 100		100
2,4-Dinitrotoluene	< 100		100	Dibenz[a,h]anthracene	< 100		100
Dibenzofuran	< 100		100	Benzo[g,h,i]perylene	< 100		100

Q = Qualifier

866300047

New Jersey Certified Lab# 14751

New York Certified Lab # 11402



# 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 : PVSC - MONITORING  
Lab Case Number : 10950 - 2903

*HC BLUE #2*

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### SEMIVOLATILES - ACIDS Method 625

Lab ID : 2903-01  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture : 100

Date Sampled : 12/26/95  
Time Sampled : 15:00  
Date Analyzed : 1/11/96

Compound	Result	Q	MDL
Phenol	< 100		100
2-Chlorophenol	< 100		100
2-Methylphenol	< 100		100
4-Methylphenol	< 100		100
Nitrophenol	< 100		100
2,4-Dimethylphenol	< 100		100
Benzoic acid	20400		1000
2,4-Dichlorophenol	< 100		100
4-Chloro-3-methylphenol	< 100		100
2,4,6-Trichlorophenol	< 100		100
2,4,5-Trichlorophenol	< 100		100
2,4-Dinitrophenol	< 100		100
4-Nitrophenol	< 100		100
4,6-Dinitro-2-methylphenol	< 100		100
Pentachlorophenol	< 100		100

### METALS EPA Series 200

Lab ID : 2903-01  
Client ID : 001  
Matrix/Units : Aqueous - mg/L  
Percent Moisture : 100

Date Sampled : 12/26/95  
Time Sampled : 15:00  
Date Analyzed : 1/11/96

Compound	Result	Q	MDL
Lead	< 0.04		0.04
Zinc	0.22		0.02

Q = Qualifier

866300048



# Integrated Analytical Laboratories, Inc.

279 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 989-5288

*LC 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

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### GENERAL ANALYTICAL

Lab ID : 2903-01

Client ID : 001

Matrix/Units : Aqueous - mg/L

Percent Moisture: 100

Date Sampled : 12/26/95

Time Sampled : 15:00

Compound (Method)	Result	Q	MDL	Date Analyzed
Biochemical Oxygen Demand (405.1)	18600		NA	1/2/96
Total Suspended Solids (160.2)	< 10.0		10.0	1/3/96

Q = Qualifier

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.

866300049

New Jersey Certified Lab# 14731

New York Certified Lab # 11402

ACCREDITED LABORATORIES, INC.  
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 2616  
SAMPLE NUMBER 9506616  
DATA FILE >09873  
CLIENT NAME CCI  
FIELD ID MMFA

MATRIX Aqueous  
DILUTION FACTOR 1.0  
DATE EXTRACTED \_\_\_\_\_  
DATE ANALYZED 05/24/95  
ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
107028	Acrolein	U	6.1	78875	1,2-Dichloropropane	U	.4
107131	Acrylonitrile	U	6.6	10061015	cis-1,3-Dichloropropene	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	U	.4
75092	Methylene Chloride	U	1.0	10061026	trans-1,3-Dichloropropene	U	.4
67641	Acetone	U	1.8	110758	2-Chloroethylvinylether	U	2.0
75150	Carbon Disulfide	U	.4	75252	Bromoform	U	.4
75694	Trichlorofluoromethane	U	.4	591786	2-Hexanone	U	.9
75354	1,1-Dichloroethane	U	.4	108101	4-Methyl-2-pentanone	U	.7
75343	1,1-Dichloroethane	U	.4	127184	Tetrachloroethane	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-Dichloroethane	U	.4	108907	Chlorobenzene	U	.4
78933	2-Butanone	U	.4	100414	Ethylbenzene	U	1.0
71556	1,1,1-Trichloroethane	U	.4	100425	Styrene	U	.4
56235	Carbon Tetrachloride	U	.4	1330207	m,p-Xylene	U	2.8
108054	Vinyl Acetate	U	.8	95476	o-Xylene	.8	2.1
75274	Bromodichloromethane	U	.4	156592	cis-1,2-Dichloroethene	U	.4

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	102 %	76-114	OK
Toluene-d8	101 %	88-110	OK
Bromofluorobenzene	101 %	86-115	OK

J - Indicates compound concentration found below MDL.  
U - Indicates compound analyzed for but not detected.

S - 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.

866300050

ACCREDITED LABORATORIES, INC.  
GMA ORGANIC ANALYSIS DATA

CASE NUMBER 2616  
SAMPLE NUMBER 4586616  
DATA FILE 3F1694  
CLIENT NAME CCI  
FIELD ID NINFA

MATRIX Aqueous  
DILUTION FACTOR 5  
DATE EXTRACTED 05/15/95  
DATE ANALYZED 05/25/95  
ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MOL	CAS #	COMPOUND	UG/L	MOL
108952	Phenol	U	50	95954	2,4,5-Trichlorophenol	U	250
95578	2-Chlorophenol	U	50	51285	2,4-Dinitrophenol	U	250
45487	2-Methylphenol	U	50	100027	4-Nitrophenol	U	250
108394	3,4-Methylphenol	U	50	534521	4,6-Dinitro-2-methylphenol	U	250
38755	2-Nitrophenol	600	50	37865	Pentachlorophenol	U	250
109579	2,4-Dimethylphenol	U	50	121142	2,4-Dinitrotoluene	U	50
120832	2,4-Dichlorophenol	U	50	94662	Diethylphthalate	U	50
101444	bis(-2-Chloroethyl)Ether	U	50	7095723	4-Chlorophenyl-phenylether	U	50
441711	1,3-Dichlorobenzene	U	50	86737	Fluorene	U	50
106467	1,4-Dichlorobenzene	U	50	100316	4-Nitroaniline	U	250
100916	benzyl Alcohol	U	50	86366	N-Nitrosodiphenylamine	U	50
10591	1,2-Dichlorobenzene	U	50	101553	4-Bromophenyl-phenylether	U	50
108501	bis(-2-Chloroethoxy)Ether	U	50	100741	Hexachlorobenzene	U	50
101647	N-Nitroso-Di-n-propylamine	U	50	25012	Phenanthrene	U	50
57001	Hexachloroethane	U	50	100127	Anthracene	U	50
49969	Nitrobenzene	U	50	84742	Di-n-Butylphthalate	U	50
10891	Isophorone	U	50	206440	Fluoranthene	U	50
10850	Benzoic Acid	U	250	109000	Pyrene	U	50
101911	bis(-2-Chloroethoxy)Methane	U	50	89587	Butylbenzylphthalate	U	50
100821	1,2,4-Trichlorobenzene	U	50	91941	2,3-Dichlorobenzodioxane	U	250
10205	Naphthalene	U	50	36555	Benzo(a)Anthracene	U	50
106478	4-Chloroaniline	U	50	117817	Bis(2-Ethylhexyl)Phthalate	U	50
10563	Hexachlorocyclopentadiene	U	50	219019	Chrysene	U	50
10576	2-Methylnaphthalene	U	50	117840	Di-n-octyl phthalate	U	50
10474	Hexachlorocyclopentadiene	U	50	295992	Benzo(b)Fluoranthene	U	50
10597	2-Chloronaphthalene	U	50	207069	Benzo(k)Fluoranthene	U	50
28724	2-Nitroaniline	U	250	50328	Benzo(a)Pyrene	U	50
101113	Dimethyl Phthalate	U	50	193395	Indeno(1,2,3-cd)Pyrene	U	50
108968	Acenaphthylene	U	50	53703	Dibenz(a,h)Anthracene	U	50
44092	3-Nitroaniline	U	250	191242	Benzo(g,h,i)Perylene	U	50
13329	Acenanthrene	U	50	62759	N-Nitrosodimethylamine	U	50
102549	Dibenzofuran	U	50	237329	2,4-Dinitrochlorobenzene	U	2500
606202	2,6-Dinitrotoluene	U	50	229715	2,5-Dinitrophenol	U	2500
109507	4-Chloro-3-methylphenol	U	50	38891	2,4,6-Trinitrophenol	U	2500
32962	2,4,6-Trichlorophenol	U	50				

ORGANIC COMPOUNDS	RECOVERY	LIMITS	STATUS
Nitrobenzene-ob	22 %	35-114	OK
2-Fluorobiphenyl	20 %	45-116	OK
Terphenyl-g14	682 %	33-141	OUT
Phenol-d5	43 %	10- 94	OK
2-Fluorophenol	31 %	21-100	OK
2,4,6-Tribromophenol	16 %	10-123	OK

U - Indicates compound concentration found below MDL.  
- Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.  
M - 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-Methylphenol and 4-Methylphenol can not be separated by the method applied

866300051



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

SAMPLE ID:	MATRIX	LAB NUMBER	DATE & TIME COLLECTED	AT LAB DATE
NED ML's	Aqueous	220698	09/21/95 08:30	09/22/95

Supervisor/Manager Signature:

*Richard S. Levine (nc)*  
Richard S. Levine

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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 ACID FRACTION ANALYSIS BY GC/MS

Lab Number: 220698 Data File: >I7063  
 Client: CHEMICAL COMPOUNDS, INC.  
 Sample source: Waste water  
 Sample ID: NPD ML's  
 Sample date: 09/21/95 Extracted Date: 09/26/95  
 Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5  
 At lab date: 09/22/95 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	U	U	200
2-Nitrophenol	U	U	200
Phenol	U	U	360
2,4-Dimethylphenol	U	U	200
2,4-Dichlorophenol	U	U	200
2,4,6-Trichlorophenol	U	U	200
Pentachlorophenol	U	U	200
2,4-Dinitrophenol	U	U	720
2,6-Dinitro-2-methylphenol	U	U	200
4-Nitrophenol	U	U	200
4-Chloro-3-methylphenol	U	U	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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 MEG

②

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: 220698 Data File: >I7063  
 Client: CHEMICAL COMPOUNDS, INC.  
 Sample source: Waste water  
 Sample ID: NPD ML's  
 Sample date: 09/21/95 Extracted Date: 09/26/95  
 Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5  
 At lab date: 09/22/95 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
N-Nitrosodimethylamine	U	U	200
bis(2-Chloroethyl) ether	U	U	200
1,3-Dichlorobenzene	U	U	480
1,4-Dichlorobenzene	U	U	460
1,2-Dichlorobenzene	U	U	480
bis(2-Chloroisopropyl) ether	U	U	240
N-Nitroso-di-n-propylamine	U	U	360
Hexachloroethane	U	U	580
Nitrobenzene	U	U	200
Isophorone	U	U	200
bis(2-Chloroethoxy) methane	U	U	200
1,2,4-Trichlorobenzene	U	U	460
Naphthalene	U	U	400
Hexachlorobutadiene	U	U	200
achlorocyclopentadiene	U	U	300
loronaphthalene	U	U	400
Dimethyl phthalate	U	U	920
Acenaphthylene	U	U	300
2,6-Dinitrotoluene	U	U	200
Acenaphthene	U	U	380
2,4-Dinitrotoluene	U	U	200
Diethyl phthalate	U	U	460
4-Chlorophenyl phenyl ether	U	U	400
Fluorene	U	U	340
N-Nitrosodiphenylamine	U	U	200
1,2-Diphenylhydrazine (Azobenzene)	U	U	200
4-Bromophenyl phenyl ether	U	U	380
Hexachlorobenzene	U	U	180
Phenanthrene	U	U	180
Anthracene	U	U	160
Di-n-butylphthalate	U	U	500
Fluoranthene	U	U	120
Benzidine	U	U	200
Pyrene	U	U	100
Butyl benzylphthalate	U	U	240
3,3'-Dichlorobenzidine	U	U	200
Benzo (a) anthracene	U	U	100
Chrysene	U	U	100
bis(2-Ethylhexyl) phthalate	U	U	600
Di-n-octylphthalate	U	U	100
Benzo (b) Fluoranthene	U	U	200

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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 MRC

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: 220698 Data File: >I7063  
 Client: CHEMICAL COMPOUNDS, INC.  
 Sample source: Waste water  
 Sample ID: NPD ML's  
 Sample date: 09/21/95 Extracted Date: 09/26/95  
 Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5  
 At lab date: 09/22/95 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
Benzo(k) fluoranthene	U	U	140
Benzo(a)pyrene	U	U	100
Indeno(1,2,3-cd)pyrene	U	U	220
Dibenz(a,h)anthracene	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.
- IND: Indeterminable

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866300055



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07868

201 361-4252  
Fax: 201 889-5288

## 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 LIMIT

< = LESS THAN THE MDL

**VOLATILES**

Lab ID: 2640-01-  
Client ID: 001  
Matrix/Units: Aqueous - µg/L  
Percent Moisture: 100

Date Sampled: 11/17/95  
Time Sampled: 11:30  
Date Analyzed: 11/28/95

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-Dichloropropene	< 50	50
Chloroethane	< 50	50	Toluene	< 50	50
Trichlorofluoromethane	< 50	50	trans-1,3-Dichloropropene	< 50	50
1,1-Dichloroethane	< 50	50	1,1,2-Trichloroethane	< 50	50
Methylene chloride	< 100	100	Tetrachloroethane	< 50	50
trans-1,2-Dichloroethane	< 50	50	Dibromochloromethane	< 50	50
1,1-Dichloroethane	< 50	50	Chlorobenzene *	2810	50
Chloroform	< 50	50	Ethylbenzene	< 50	50
1,1,1-Trichloroethane	< 50	50	Xylenes, total	*49100	2000
Carbon tetrachloride	< 50	50	Bromoform	< 50	50
1,2-Dichloroethane	< 50	50	1,1,2,2-Tetrachloroethane	< 50	50
Benzene	< 50	50	1,3-Dichlorobenzene	< 50	50
Trichloroethane	< 50	50	1,4-Dichlorobenzene	< 50	50
1,2-Dichloropropene	< 50	50	1,2-Dichlorobenzene	169	50

\*Result from diluted Sample Analysis.

Continued on next page.

YELLOW #2 "PURE"



# 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: INTERNAL MONITORING  
Lab Case Number: 10950 - 2640

MDL = METHOD DETECTION LIMIT < - LESS THAN THE MDL

**SEMIVOLATILES (BNA)**

Lab ID: 2640-01 -  
Client ID: 001  
Matrix/Units: Aqueous - µg/L  
Percent Moisture: 100

Date Sampled: 11/17/95  
Time Sampled: 11:30  
Date Analyzed: 11/28/95

Compound	Conc.	MDL Compound	Conc.	MDL
3-Nitroaniline	< 100	100 Carbazole	< 100	100
Acenaphthene	< 100	100 Di-n-butylphthalate	< 100	100
2,4-Dinitrophenol	< 100	100 Fluoranthene	< 100	100
4-Nitrophenol	< 100	100 Benzidine	< 100	100
2,4-Dinitrotoluene	< 100	100 Pyrene	< 100	100
Dibenzofuran	< 100	100 3,3'-Dimethylbenzidine	< 100	100
Diethylphthalate	< 100	100 Butylbenzylphthalate	< 100	100
Fluorene	< 100	100 3,3'-Dichlorobenzidine	< 100	100
4-Chlorophenyl-phenylether	< 100	100 Benzo[a]anthracene	< 100	100
4-Nitroaniline	< 100	100 Chrysene	< 100	100
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
Hexachlorobenzene	< 100	100 Benzo[a]pyrene	< 100	100
Pentachlorophenol	< 100	100 Indeno[1,2,3-cd]pyrene	< 100	100
Phenanthrene	< 100	100 Dibenz[a,h]anthracene	< 100	100
Anthracene	< 100	100 Benzo[g,h,i]perylene	< 100	100

YELLOW #2 "PURE"



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07069

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 - 2648

MDL - METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### SEMIVOLATILES (BNA)

Lab ID: 2640-01  
Client ID: 001  
Matrix/Units: Aqueous - µg/L  
Percent Moisture: 100

Date Sampled: 11/17/95  
Time Sampled: 11:30  
Date Analyzed: 11/28/95

Compound	Conc.	MDL	Compound	Conc.	MDL
N-Nitrosodimethylamine	< 100	100	bis(2-Chloroethoxy)methane	< 100	100
Phenol	< 100	100	Benzoic acid	< 500	500
Aniline	< 100	100	2,4-Dimethylaniline	< 100	100
bis(2-Chloroethyl)ether	< 100	100	2,4-Dichlorophenol	< 100	100
2-Chlorophenol	496	100	1,2,4-Trichlorobenzene	< 100	100
1,3-Dichlorobenzene	< 100	100	Naphthalene	< 100	100
1,4-Dichlorobenzene	< 100	100	4-Chloroaniline	< 100	100
Benzyl alcohol	< 100	100	Hexachlorobutadiene	< 100	100
1,2-Dichlorobenzene	< 100	100	4-Chloro-3-methylphenol	< 100	100
2-Methylphenol	< 100	100	2-Methylsaphthalene	< 100	100
bis(2-chloroisopropyl)ether	< 100	100	Hexachlorocyclopentadiene	< 100	100
4-Methylphenol	< 100	100	2,4,6-Trichlorophenol	< 100	100
N-Nitroso-di-n-propylamine	< 100	100	2,4,5-Trichlorophenol	< 100	100
2-Aminotoluene + 4-Aminotoluene	< 100	100	2-Chlorophthalene	< 100	100
Hexachloroethane	< 100	100	2-Nitroaniline	5510	100
Nitrobenzene	259	100	Dimethylphthalate	< 100	100
Isophorone	< 100	100	2,6-Dinitrotoluene	< 100	100
2-Nitrophenol	3380	100	Acenaphthylene	< 100	100
2,4-Dimethylphenol	< 100	100			

Continued on next page.

Yellow #2 "PURE"

New Jersey Certified Lab # 14751

New York Certified Lab # 11402

866300058



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 989-5288

*YELLOW #4*

## ANALYTICAL DATA REPORT

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

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

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### VOLATILES Method 624

Lab ID : 2639-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture: 100

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/28/95

Compound	Conc. Q	MDL	Compound	Conc. Q	MDL
Chloroethane	< 50	50	Bromodichloromethane	< 50	50
Vinyl Chloride	< 50	50	2-Chloroethyl Vinyl Ether	< 50	50
Bromoethane	< 50	50	cis-1,3-Dichloropropane	< 50	50
Chloroethane	< 50	50	Toluene	< 50	50
Trichlorofluoroethane	< 50	50	trans-1,3-Dichloropropane	< 50	50
1,1-Dichloroethane	< 50	50	1,1,2-Trichloroethane	< 50	50
Methylene Chloride	< 100	100	Tetrachloroethane	< 50	50
trans-1,2-Dichloroethane	< 50	50	Dibromochloromethane	< 50	50
1,1-Dichloroethane	< 50	50	Chlorobenzene	< 50	50
Chloroform	53.1	50	Ethylbenzene	< 50	50
1,1,1-Trichloroethane	< 50	50	Total Xylenes	260	50
Carbon Tetrachloride	< 50	50	Bromoform	< 50	50
1,2-Dichloroethane -	7200*	200	1,1,2,2-Tetrachloroethane	< 50	50
Benzene	< 50	50	1,3-Dichlorobenzene	< 50	50
Trichloroethane	< 50	50	1,4-Dichlorobenzene	< 50	50
1,2-Dichloropropane	< 50	50	1,2-Dichlorobenzene	< 50	50

\* Results from diluted sample analysis.

### TOTAL CYANIDE Method 335.2

Lab ID : 2639-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture: 100

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/28/95

Result	MDL
< 0.05	0.05

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

*Michael H. Loftin*  
Michael H. Loftin, 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 # 14731

New York Certified Lab # 11402

866300059





# 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

*HC Yellow #4*

Project Name : PVSC - MONITORING  
Lab Case Number : 10998 - 2638

**MDL = METHOD DETECTION LIMIT**

**< = LESS THAN THE MDL**

### SEMIVOLATILES - ACIDS Method 625

Lab ID : 2638-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L  
Percent Moisture: 100 -

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/28/95

Compound	Result	Q	MDL
Phenol	< 100		100
2-Chlorophenol	< 100		100
2-Methylphenol	< 100		100
4-Methylphenol	< 100		100
2-Nitrophenol	< 100		100
2,4-Dimethylphenol	< 100		100
Benzoic acid	< 500		500
2,4-Dichlorophenol	< 100		100
4-Chloro-3-methylphenol	< 100		100
2,4,6-Trichlorophenol	< 100		100
2,4,5-Trichlorophenol	< 100		100
2,4-Dinitrophenol	< 100		100
4-Nitrophenol	< 100		100
4,6-Dinitro-2-methylphenol	< 100		100
Pentachlorophenol	< 100		100

### METALS EPA Series 200

Lab ID : 2638-001  
Client ID : 001  
Matrix/Units : Aqueous - mg/L  
Percent Moisture: 100

Date Sampled : 11/17/95  
Time Sampled : 11:30  
Date Analyzed : 11/22/95

Compound	Result	Q	MDL
Lead	0.15		0.04
Zinc	0.53		0.02

Q = Qualifier

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

*Michael H. Leftin*  
Michael H. Leftin, Ph.D.  
Laboratory Director

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New Jersey Certified Lab# 14731

New York Certified Lab # 11402

866300060



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

201 361-4252  
Fax: 201 989-5288

## ANALYTICAL DATA REPORT

for

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

Project Name : PVSC - MONITORING  
Lab Case Number : 18950 - 2638

*HC Yellow #4*

MDL - METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### SEMIVOLATILES - BASE NEUTRALS

Method 625

Lab ID : 2638-001

Client ID : 001

Matrix/Units : Aqueous - µg/L

Percent Moisture: 100

Date Sampled : 11/17/95

Time Sampled : 11:30

Date Analyzed : 11/28/95

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	*47600		400	4-Chlorophenyl-phenylether	< 100		100
1,3-Dichlorobenzene	< 100		100	4-Nitroaniline	< 100		100
1,4-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100		100
Benzyl alcohol	< 100		100	1,2-Diphenylhydrazine/Azobenzene	< 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
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-Trichlorobenzene	< 100		100	Benazidine	< 100		100
Naphthalene	< 100		100	Pyrene	< 100		100
4-Chloroaniline	< 100		100	3,3'-Dimethylbenzidine	< 100		100
Hexachlorobutadiene	< 100		100	Butylbenzylphthalate	< 100		100
2-Methylnaphthalene	< 100		100	3,3'-Dichlorobenzidine	< 100		100
Hexachlorocyclopentadiene	< 100		100	Benzo[a]anthracene	< 100		100
2-Chloronaphthalene	< 100		100	Chrysene	< 100		100
2-Nitroaniline	< 100		100	bis(2-Ethylhexyl)phthalate	107		100
Dimethylphthalate	< 100		100	Di-n-octylphthalate	< 100		100
2,6-Dinitrotoluene	< 100		100	Benzo[b]fluoranthene	< 100		100
Acenaphthylene	< 100		100	Benzo[k]fluoranthene	< 100		100
3-Nitroaniline	< 100		100	Benzo[a]pyrene	< 100		100
Acenaphthene	< 100		100	Indeno[1,2,3-cd]pyrene	< 100		100
2,4-Dinitrotoluene	< 100		100	Dibenz[a,h]anthracene	< 100		100
Dibenzofuran	< 100		100	Benzo[g,h,i]perylene	< 100		100

Q - Qualifier

\* - Result from diluted analysis.

Continued on the next page.

866300062



# 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

DNHA = #13

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

VOLATILES				
Compound	Conc.	MDL Compound	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
Chloroethane	< 100	100 Toluene	< 100	100
Trichlorofluoromethane	< 100	100 trans-1,3-Dichloropropene	< 100	100
1,1-Dichloroethane	< 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

Lab ID: 1719-002  
Client ID: 002  
Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

## TENTATIVELY IDENTIFIED COMPOUNDS

Lab ID: 1719-002  
Client ID: 002  
Matrix/Units: Aqueous - µg/L

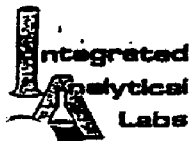
Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

CAS#	COMPOUND	ESTIMATED CONCENTRATION	RETENTION TIME
	Unknown	146000	5.82

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New Jersey Certified Lab#14751

New York Certified Lab # 11402



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

866300063  
201 361-4252  
Fax: 201 989-5288

## 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 LIMIT

< = LESS THAN THE MDL

### BASE NEUTRALS ACIDS

Lab ID: 1719-002  
Client ID: 002  
Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 160.0	160.0 bis(2-Chloroethoxy)methane	< 160.0	160.0
Phenol	< 160.0	160.0 Benzoic acid	< 800.0	800.0
Aniline	< 160.0	160.0 2,4-Dimethylaniline	< 160.0	160.0
bis(2-Chloroethyl)ether	< 160.0	160.0 2,4-Dichlorophenol	< 160.0	160.0
2-Chlorophenol	< 160.0	160.0 1,2,4-Trichlorobenzene	< 160.0	160.0
1,3-Dichlorobenzene	< 160.0	160.0 Naphthalene	< 160.0	160.0
1,4-Dichlorobenzene	< 160.0	160.0 4-Chloroaniline	< 160.0	160.0
Benzyl alcohol	< 160.0	160.0 Hexachlorobutadiene	< 160.0	160.0
1,2-Dichlorobenzene	< 160.0	160.0 4-Chloro-3-methylphenol	< 160.0	160.0
2-Methylphenol	< 160.0	160.0 2-Methylnaphthalene	< 160.0	160.0
bis(2-chloroisopropyl)ether	< 160.0	160.0 Hexachlorocyclopentadiene	< 160.0	160.0
4-Methylphenol	< 160.0	160.0 2,4,6-Trichlorophenol	< 160.0	160.0
N-Nitroso-di-n-propylamine	< 160.0	160.0 2,4,5-Trichlorophenol	< 160.0	160.0
2-Aminotoluene + 4-Aminotoluene	< 160.0	160.0 2-Chloronaphthalene	< 160.0	160.0
Hexachloroethane	< 160.0	160.0 2-Nitroaniline	< 160.0	160.0
Nitrobenzene	< 160.0	160.0 Dimethylphthalate	< 160.0	160.0
Isophorone	< 160.0	160.0 2,6-Dinitrotoluene	< 160.0	160.0
2-Nitrophenol	< 160.0	160.0 Acenaphthylene	< 160.0	160.0
2,4-Dimethylphenol	< 160.0	160.0		

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866300064



# 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

DNHA #13

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### BASE NEUTRALS ACIDS

Lab ID: 1719-002

Client ID: 002

Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

Compound	Conc.	MDL	Compound	Conc.	MDL
3-Nitroaniline	< 160.0	160.0	Carbazole	< 160.0	160.0
Acenaphthene	< 160.0	160.0	Di-n-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-Nitroaniline	< 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
Hexachlorobenzene	< 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#-14731

New York Certified Lab # 11402

TIERRA-B-004663



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

866300065  
201 361-4252  
Fax: 201 989-5288

## ANALYTICAL DATA REPORT

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

Yellow #5 Ba# 13

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### VOLATILES

Lab ID: 1719-001  
Client ID: 001  
Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95  
Time Sampled: 11:00  
Date Analyzed: 8/15/95

Compound	Conc.	MDL Compound	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
Chloroethane	< 100	100 Toluene	< 100	100
Trichlorofluoromethane	< 100	100 trans-1,3-Dichloropropene	< 100	100
1,1-Dichloroethane	< 100	100 1,1,2-Trichloroethane	< 100	100
Methylene chloride	< 200	200 Tetrachloroethane	< 100	100
trans-1,2-Dichloroethane	< 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
Trichloroethane	< 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  
Date Analyzed: 8/15/95

CAS#	COMPOUND	ESTIMATED CONCENTRATION	RETENTION TIME
	Unknown	158000	5.76

Continued on next page.

New Jersey Certified Lab#-14751

New York Certified Lab # 11402

866300066



# 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

Yellow 5, #13

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### BASE NEUTRALS ACIDS

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 40.0	40.0 bis(2-Chloroethoxy)methane	< 40.0	40.0
Phenol	< 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-Chlorophenol	< 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
1,2-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
bis(2-chloroisopropyl)ether	< 40.0	40.0 Hexachlorocyclopentadiene	< 40.0	40.0
4-Methylphenol	< 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
Isophorone	< 40.0	40.0 2,6-Dinitrotoluene	< 40.0	40.0
2-Nitrophenol	< 40.0	40.0 Acenaphthylene	< 40.0	40.0
2,4-Dimethylphenol	< 40.0	40.0		

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New Jersey Certified Lab# 14751

New York Certified Lab # 11402

TIERRA-B-004665



# Integrated Analytical Laboratories, Inc.

866300067

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

*YELLOW #15, Bc #13*

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

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### BASE NEUTRALS ACIDS

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - µg/L

Date Sampled : 8/9/95

Time Sampled : 11:00

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 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.

New York Certified Lab # 11402





# Integrated Analytical Laboratories, Inc.

866300068

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*

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

### VOLATILES - (601/602)

Lab ID : 1439-001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

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

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	Chlorobenzene	< 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 - µg/L

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*  
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

New York Certified Lab # 11402



# Integrated Analytical Laboratories, Inc.

273 Franklin Road  
Randolph, N.J. 07869

866300069  
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*

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

Lab ID : 1438- 001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

Date Sampled : 7/7/95  
Time Sampled : 14:00  
Date Analyzed : 7/15/95

### BASE NEUTRALS

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-Dichlorobenzene	< 50.0	50.0	N-Nitrosodiphenylamine	< 50.0	50.0
Benzyl alcohol	< 50.0	50.0	1,2-Diphenylhydrazine/Azobenzene	< 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-Chloronaphthalene	< 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. Lefin*  
Michael H. Lefin, 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

New York Certified Lab # 11402

866300070



# 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 - 1438

NOPD

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

Lab ID : 1438- 001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

Date Sampled : 7/7/95  
Time Sampled : 14:00  
Date Analyzed : 7/13/95

Compound	Result	Q	MDL
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-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/Corrosivity

Lab ID : 1438- 001  
Client ID : 001  
Matrix/Units : Aqueous - µg/L

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

  
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

New York Certified Lab # 11402

TIERRA-B-004669

ACCREDITED LABORATORIES, INC.  
VOLATILE ORGANIC ANALYSIS DATA

866300071

CASE NUMBER 2713  
SAMPLE NUMBER 9502011  
LAB FILE JA3114  
CLIENT NAME CCI  
FIELD ID RED#3

MATRIX Aqueous  
DILUTION FACTOR 10  
DATE EXTRACTED \_\_\_\_\_  
DATE ANALYZED 06/02/95  
ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
107028	Acrolein	U	61	78875	1,2-Dichloropropane	U	4.0
107131	Acrylonitrile	U	66	10061015	cis-1,3-Dichloropropene	U	4.0
74873	Chloromethane	U	20	79016	Trichloroethene	U	4.0
74839	Bromomethane	U	20	71432	Benzene	U	4.0
75014	Vinyl Chloride	U	20	124481	Dibromochloromethane	U	4.0
75003	Chloroethane	U	20	79005	1,1,2-Trichloroethane	U	4.0
75092	Methylene Chloride	32 W	10	10061026	trans-1,3-Dichloropropene	U	4.0
67641	Acetone	U	18	110758	2-Chloroethylvinylether	U	20
75150	Carbon Disulfide	U	4.0	75252	Bromoform	U	4.0
75694	Trichlorofluoromethane	U	4.0	591786	2-Hexanone	U	9.0
75354	1,1-Dichloroethene	U	4.0	108101	4-Methyl-2-pentanone	U	7.0
75343	1,1-Dichloroethane	U	4.0	127184	Tetrachloroethene	U	4.0
156605	trans-1,2-Dichloroethene	U	4.0	79345	1,1,2,2-Tetrachloroethane	U	6.0
67663	Chloroform	41 W	4.0	108883	Toluene	17	5.0
107062	1,2-Dichloroethane	50 W	4.0	108907	Chlorobenzene	U	4.0
78933	2-Butanone	54	4.0	100414	Ethylbenzene	U	10
71556	1,1,1-Trichloroethane	U	4.0	100425	Styrene	U	4.0
135	Carbon Tetrachloride	U	4.0	1330207	m,p-Xylene	35	28
1094	Vinyl Acetate	U	8.0	95476	o-Xylene	U	21
14	Bromodichloromethane	31 W	4.0	156592	cis-1,2-Dichloroethene	U	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	101 %	76-114	OK
Toluene-d8	100 %	88-110	OK
Bromofluorobenzene	96 %	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.

866300072

ACCREDITED LABORATORIES, INC.  
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 2213  
 SAMPLE NUMBER 9542011  
 DATA FILE >F1875  
 CLIENT NAME CCI  
 FIELD ID RED#3

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

CAS #	COMPOUND	UG/L	MOL	CAS #	COMPOUND	UG/L	MOL
108952	Phenol	U	50	59507	4-Chloro-3-methylphenol	U	50
95578	2-Chlorophenol	U	50	88062	2,4,6-Trichlorophenol	U	50
95487	2-Methylphenol	U	50	95954	2,4,5-Trichlorophenol	U	250
108394	3,4-Methylphenol	U	50	51285	2,4-Dinitrophenol	U	250
88755	2-Nitrophenol	U	50	100027	4-Nitrophenol	U	250
105679	2,4-Dimethylphenol	U	50	534521	4,6-Dinitro-2-methylphenol	U	250
120832	2,4-Dichlorophenol	U	50	87865	Pentachlorophenol	U	250
111444	bis(2-Chloroethyl)Ether	U	50	121142	2,4-Dinitrotoluene	U	50
541731	1,3-Dichlorobenzene	U	50	84662	Diethylphthalate	U	50
106467	1,4-Dichlorobenzene	U	50	7005723	4-Chlorophenyl-phenylether	U	50
100516	Benzyl Alcohol	U	50	86737	Fluorene	U	50
95501	1,2-Dichlorobenzene	U	50	100016	4-Nitroaniline	U	250
108601	bis(2-Chloroisopropyl)ether	U	50	86386	N-Nitrosodiphenylamine	U	50
621647	N-Nitroso-Di-n-propylamine	U	50	101553	4-Bromophenyl-phenylether	U	50
67721	Hexachloroethane	U	50	118741	Hexachlorobenzene	U	50
98953	Nitrobenzene	U	50	85018	Phenanthrene	U	50
78591	Isophorone	U	50	120127	Anthracene	U	50
98950	Benzoic Acid	U	250	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	Naphthalene	U	50	85687	Butylbenzylphthalate	U	50
106478	4-Chloroaniline	U	50	91941	3,3'-Dichlorobenzidine	U	100
87683	Hexachlorobutadiene	U	50	56553	Benzo(a)Anthracene	U	50
91576	2-Methylnaphthalene	U	50	117817	Bis(2-Ethylhexyl)Phthalate	U	50
77474	Hexachlorocyclopentadiene	U	50	218019	Chrysene	U	50
91587	2-Chloronaphthalene	U	50	117840	Di-n-octyl phthalate	U	50
88744	2-Nitroaniline	100 J	250	205992	Benzo(b)fluoranthene	U	50
131113	Dimethyl Phthalate	U	50	207089	Benzo(k)Fluoranthene	U	50
208968	Acenaphthylene	U	50	50328	Benzo(a)Pyrene	U	50
99092	3-Nitroaniline	U	250	193395	Indeno(1,2,3-cd)Pyrene	U	50
83329	Acenaphthene	U	50	53703	Dibenzo(a,h)Anthracene	U	50
132649	Dibenzofuran	U	50	191242	Benzo(g,h,i)Perylene	U	50
606202	2,6-Dinitrotoluene	U	50	62759	N-Nitrosodimethylamine	U	50

## SURROGATE COMPOUNDS

Nitrobenzene-d5  
 2-Fluorobiphenyl  
 Terphenyl-d14  
 Phenol-d5  
 2-Fluorophenol  
 2,4,6-Tribromophenol

## RECOVERY

52 %  
 81 %  
 21 %  
 24 %  
 122 %

## LIMITS

35-114  
 43-116  
 33-141  
 18- 94  
 21-100

## STATUS

OK  
 OK  
 OUT  
 OK  
 OUT

\*\*\*\*\* NOT DETECTED \*\*\*\*\*

J - Indicates compound concentration found below MDL.  
 J - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.  
 \* - 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-Methylphenol and 4-Methylphenol can not be separated by the method applied

866300073

ACCREDITED LABORATORIES, INC.  
GENERAL CHEMISTRY ANALYSIS DATA

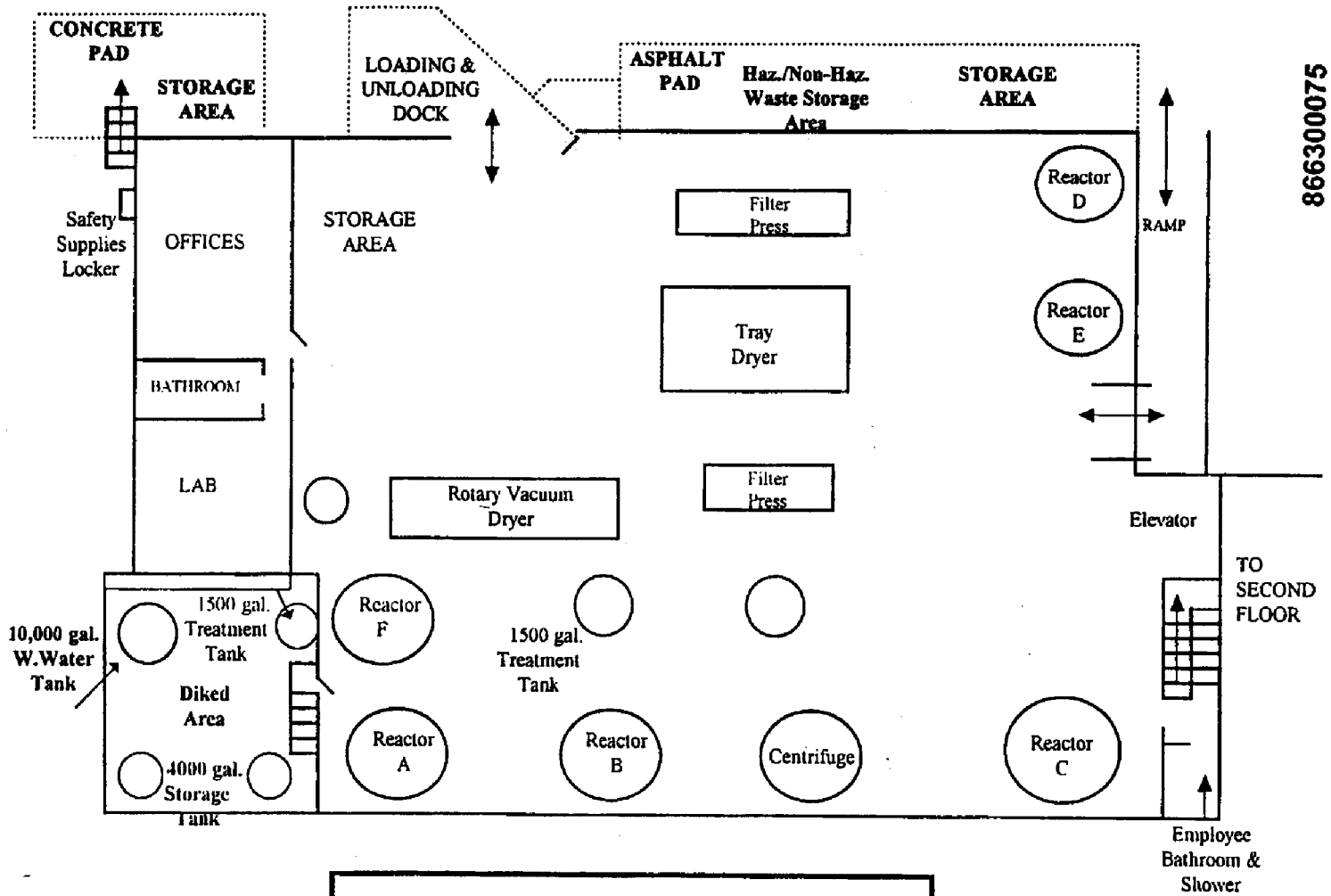
Case #: 2713  
Sample #: 9507011  
Client Name: CCY  
Field Number: RED/5

Matrix: AQUEOUS  
Date Received: 05/19/95

ANALYTES	RESULTS	MDL	UNITS	DILUTION FACTOR	METHOD BLANK		ANALYSIS DATE
					RESULTS	MDL	
Cyanide, Total	ND	0.01	mg/L	1.	ND	0.01	05/23/95



**866300074**



866300075

<b>CHEMICAL COMPOUNDS INC.</b> 29-75 Riverside Ave. Newark, N.J. 07104	
<b>LOCATION OF STORAGE AREAS</b>	
Signature: <i>[Handwritten Signature]</i>	Date: 7/22/96



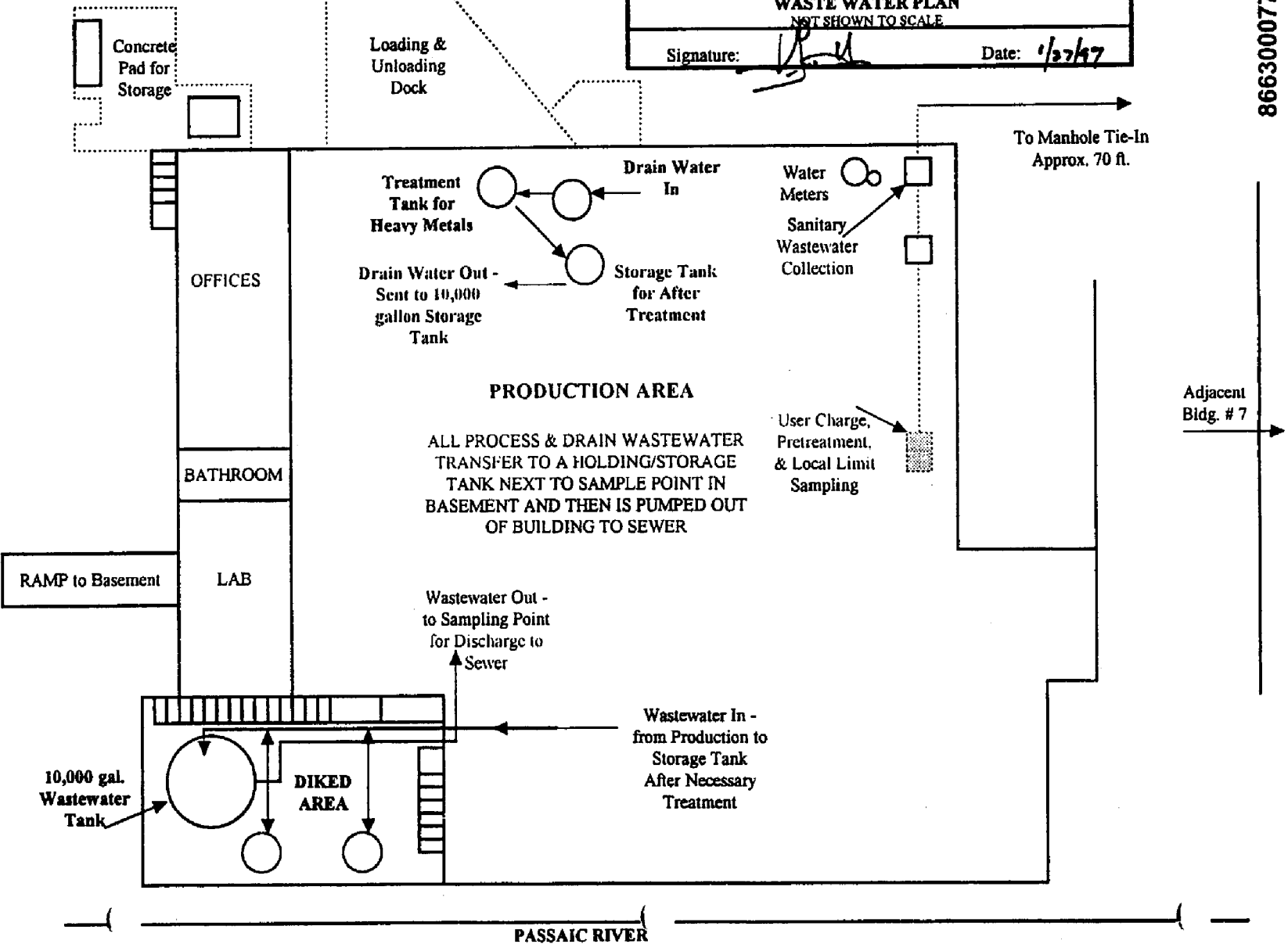


866300076

**CHEMICAL COMPOUNDS INC.**  
 29-75 Riverside Ave.  
 Newark, N.J. 07104

**WASTE WATER PLAN**  
 NOT SHOWN TO SCALE

Signature: *[Signature]* Date: 1/27/77



866300077



866300078

866300079

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

INVESTIGATION

Case #: 92-01-07-1025

File #: 0714  
PAC CODE: TFF

Date: 01/07/92

Investigator: Matthew Garamone  
Christopher Gibbons

Time Arrived: 1115

Time Departed: 1400

Location: Chemical Compounds, Inc.  
Address: 29-75 Riverside Avenue  
Newark, NJ

Responsible Party: Chemical Compounds, Inc.  
Mailing Address: 29-75 Riverside Avenue  
Newark, NJ

Location Phone #: 201-405-3211

Responsible Dept. Rep: Bob Swales - Newark OEM Phone #: 201-733-3664

Origin of Complaint: Oper. Piccitto - NJSP Marine Bureau Phone #: 201-578-8173

I  
II  
Nature of Complaint: Unknown liquid being discharged from pipe onto ground and into Passaic River at incident location.

Findings: BER Region I responded to Newark to investigate the report by the NJSP Marine Bureau at Newark Bay of the discharge of an unknown, purple liquid from a pipe at the Chemical Compounds facility entering the Passaic River. MPO's Mundorff and Kirschner of the NJSP Marine Bureau at Newark Bay were investigating a complaint of a suspected illegal discharge from Chemical Compounds' facility by employees at the Napp-Grecco Company adjacent to the incident location. MPO's Mundorff and Kirschner reported to investigators Garamone and Gibbons that they had observed a hose line coming from the rear of the Chemical Compounds' building and discharging an unknown, purple liquid onto the ground adjacent to the Passaic River. Inspection of the property between the facility and the river revealed a large stained area with a free-standing puddle of a dark purple liquid with a strong odor of acetic acid. There were also signs of spillage over the bulkhead and into the river at this location. No hose line was present in this area at the time of BER I's inspection at the incident location.

At the rear of the property, near to the Napp-Grecco Company, is an open pit with an exposed sanitary sewer line. There were free-standing puddles of dark purple liquid in this area. According to Chemical Compounds' owners, Alberto Celleri and Harold Sullivan, the facility

FROM Robert C Matute/ESS 1-B&I-P-32

MAR 09 '92 10:49:10 2014854870

has been experiencing problems with this sanitary line backing-up and was attempting to unclog it by pumping it out and snaking the line. According to Alberto Celleri, the large stained area of ground with a puddle of dark purple liquid, on the side of the facility next to the Passaic River, was the result of the floors of the process area being washed down by an employee. This puddle indicated positive by Drager for acetic acid and had a pH of 1.

Chemical Compounds, Inc. manufactures hair dyes. In particular, the facility has been producing red #3 and HC-blue #2 hair dyes. The dark purple liquid observed on the ground around the outside of the facility is attributed to these two dyes. The facility stores its waste liquid from their processes in a 5,500 gallon capacity tanker in the rear of the facility. Disposal of this material is through Chemical Waste Management which manifests the waste as a non-hazardous process liquid n.o.s. Prior to recycling methanol in their processes, the facility also disposed of waste methanol through Chemical Waste Management and had an EPA generator number assigned to the facility (#NJ0108-06-1737). The facility maintains a tanker of methanol on-site with a capacity of 4,000 gallons for their processes. Floor drains at the facility discharge into the sanitary sewer system according to Mr. Celleri. The facility, however, has no permit from PVSC to discharge any material from their processes into the sanitary line.

MPD's Mundorff and Kirschner went to Clara Maas Hospital in Belleville due to chemical exposure at the incident location. In addition, 8 employees at the Napp-Greco Co. adjacent to the incident location sought medical attention for chemical exposure at First Care Medical Group in Kearny. Investigators from the Essex County Prosecutor's office and the Division of Criminal Justice also performed an investigation of this incident. Investigators Garamone and Gibbons issued a NOV to Chemical Compounds, Inc. for the discharge and non-notification of a discharge of a hazardous substance pursuant to the RCRA act. The facility contracted ENSI, Inc. of Newark to perform a clean-up of all free-standing liquid on the property and to collect samples for analysis of the stained areas of ground and free-standing liquid. The affected areas were covered with plastic to prevent the need to remove any contaminated soil based on these findings.

Conclusions: BER Region I responded to Newark to investigate the report by the NJSP Marine Bureau of the illegal dumping of an unknown liquid into the Passaic River from the Chemical Compounds' facility. The discharge of an unknown, dark purple liquid containing acetic acid and/or acetic anhydride occurred onto the ground at the facility. ENSI, Inc. of Newark was hired by the facility to perform a clean-up. A citation was issued for this discharge and the incident is under a criminal investigation by both the State and the County.

866300080

Recommendations: This case will be referred to BFO-Metro for follow-up work regarding the removal of suspected contaminated soil affected by this discharge at the facility and to evaluate the hazardous waste disposal practices of the facility.

[Signature]  
Investigator

01/13/92  
Date

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

866300081

**NEWARK FIRE DEPARTMENT**

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

**(201) 733-7506**

**STANLEY J. KOSSUP**

*Director/Fire Chief*

**Fax (201) 733-7488**

---

**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.

**866300082**

**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. X

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

**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. X

**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.

866300083



**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.

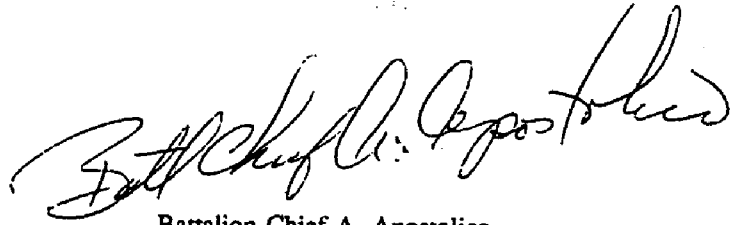
The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow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

866300084

**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

FAX 201 Vincent Blvd.  
733-7506  
733-7492

866300085



866300086

866300087

TOTAL ANALYTICAL SERVICES FOR A SAFE ENVIRONMENT



nytest environmental inc.

January 31, 1992

Ensi Inc.  
194 Avenue L  
Newark, NJ 07105

Attn: Fred Virrazzi

Nyttest 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,

Nyttest Environmental 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 inc.

## Sample Identification and Results

Log In No.: 10997

Sample No: 1  
Lab Sample ID No.: 1099701

Results	Max. Allowable Levels	Found
pH @ 20 C	2 - 12.5	4.35
Ignitability, F PM	140	> 212
Corrosivity, inches/year	0.250	< 0.01
Reactivity to Cyanide, PPM	-	< 1.0
Reactivity to Sulfide, PPM	-	< 1.0
Total Solids, %	-	49.3
Petroleum Hydrocarbons, PPM (Dry wt.)	-	5350
PCB's ,PPM (Dry wt.)	-	< 2.0

ND = None Detected  
< = Less than

00010

866300088



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

<u>METALS</u>	<u>RESULTS</u>	<u>BLANK</u>	<u>MDL</u>	<u>MAX. ALLOWABLE LIMITS</u>
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

866300090

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

<u>WASTE CHARACTERISTICS</u>	<u>RESULTS</u>	<u>BLANK</u>	<u>MDL</u>	<u>MAX. ALLOWABLE LIMITS (ppm)</u>
PCB (mg/l)	N.D.	N.D.	0.36	(mg/kg) 5-50
Reactivity for CN-(mg HCN/l)	N.D.	N.D.	5.0	250
Reactivity for S-(mg H <sub>2</sub> S/l)	N.D.	N.D.	10.0	500
Total Pet.Hydc. (TPHC) (mg/l)	3.0	N.D.	0.10	30000
Ignitability (oF)	Not Ignitable	N/A	N/A	>140
Corrosivity as pH	4.5	N/A	N/A	2 < pH < 12.5

Test results are in mg/l, unless specified.

N/A: Not Applicable

N.D.: Not Detected

MDL: Minimum Detection Limit

866300091



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

<u>SAMPLE ID</u>	<u>RESULTS (unit)</u>
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

866300092

TECHNION,  
 Testing and Research Laboratory  
 200 Delawanna Avenue  
 Clinton, New Jersey 07014  
 (201) 773-5013  
 FAX #: (201) 773-4788

PAGE 1 of 2  
 LAB ID #

PRODUCT NAME CHEMICAL COMPOUNDS PROJECT NO. \_\_\_\_\_

COLLECTED BY (Name) Frank J. Jr. (Signature) Jim

CHAIN OF CUSTODY

Site Type Site ID  
 55 FAL METAL DRUMS

Sample No.	Date Spid	Time Spid	Sampling Point and Sampling Method Description	Sample Material	Analysis	Remarks
DRUM #1	2-24-92	1400	DRUMS # 1-11 GRABS	LIQUID		
DRUM #2	2-24-92		" " "			
DRUM #3	2-24-92		" " "			
DRUM #4	2-24-92		" " "			
DRUM #5	2-24-92		" " "			
DRUM #6	2-24-92		" " "			
DRUM #7	2-24-92		" " "			
DRUM #8	2-24-92		" " "			

RECEIVED BY	ORGANIZATION	DATE/TIME	RECEIVED BY	ORGANIZATION	DATE/TIME	REMARKS
<u>Harold Sullivan</u>	<u>CHEMICAL COMPOUNDS</u>	<u>2/24/92 1430</u>	<u>Frank J. Jr.</u>	<u>TECHNION INC</u>	<u>2/24/92 1430</u>	

866300093

Testing and Research Laboratory  
 200 Delaware Avenue  
 Camden, New Jersey 07901

TEL: (201) 775-5013  
 FAX: (201) 775-4788

LAB #

PRODUCT NAME Chemical Compounds

PROJECT NO.

COLLECTED BY (Name) Frank J. Green

(Signature) Frank J. Green

CHAIN OF CUSTODY

Site Type Site ID

55 GAL DRUMS	
-----------------	--

Sample No.	Date Spld	Time Spld	Sampling Point and Sampling Method Description	Sample Material	Analysis	Remarks
DRUM #9	2-24-92	1406	DRUMS #1-11 GRABS	LIQUID		
DRUM #10	2-24-92		" " "			
DRUM #11	2-24-92		" " "			
DRUM COMPOSITE			GRABS FROM #1-11		RCRA WASTE CLASSIFICATION	

RELINQUISHED BY	ORGANIZATION	DATE/TIME	RECEIVED BY	ORGANIZATION	DATE/TIME	REMARKS
<u>Harold Sullivan</u>	CHEMICAL Compounds	2/24/92 1430	<u>Frank J. Green</u>	TECHNION INC.	2/24/92 1430	

866300094





866300096

FILED

DEC 5 1994

HARRY A. MARGOLIS  
P.J. Ch

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

SUPERIOR COURT OF NEW JERSEY  
: CHANCERY DIVISION - ESSEX COUNTY

PASSAIC VALLEY SEWERAGE  
COMMISSIONERS, a body politic :  
and corporate of the state of :  
New Jersey, :  
Plaintiff, :  
v. :  
CHEMICAL COMPOUNDS, INC., :  
Defendant. :

DOCKET NO: C-338-93  
Civil Action  
CONSENT ORDER AND  
FINAL JUDGMENT

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;

866300097

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 § 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.



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

5. 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. If the 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

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.

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.

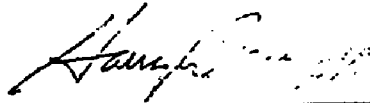
19. The defendant shall give written notice of this Order to any successor in interest prior to transfer of ownership of the facility which is the subject of this Order and shall simultaneously verify to the PVSC that such notice has been given.

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.

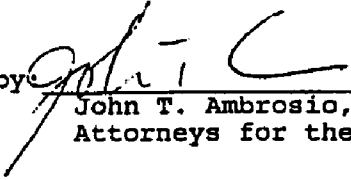


Hon. Harry A. Margolis, P.J.Ch.

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


GABRIEL M. AMBROSIO, ESQ.

Dated: 2/2/94

by   
John T. Ambrosio, Esq.  
Attorneys for the PVSC

CHEMICAL COMPOUNDS, INC.

Dated: 11/29/94

  
Authorized Signature

ALBERTO CELLERI  
Print Name

PRESIDENT  
Print Title & Position

JTA:ja  
Chemical Compounds.con

866300106

**VIOLATION NOTICE**  
**HAZARDOUS MATERIALS REGULATIONS**

CITY OF NEWARK  
FIRE DEPARTMENT

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

NOTICE OF VIOLATION AND ORDER  
TO TERMINATE

NON COMPLIANCE

COURT ACTION REQUIRED

**IDENTIFICATION**

LOCATION: 29 Riverside Avenue

Block: \_\_\_\_\_

Lot: \_\_\_\_\_

OWNER:

Name Chemical Compounds

AGENT:

Name Harold Sullivan

Address 29-75 Riverside Avenue

Address 29-75 Riverside Avenue

Town/State/Zip Newark, NJ 07104

Town/State/Zip Newark, NJ 07104

"Hazard" Permit #: \_\_\_\_\_

**ACTION**

DATE OF NOTICE: \_\_\_\_\_

COMPLIANCE DUE DATE: \_\_\_\_\_

DATE OF INSPECTION: \_\_\_\_\_

TAKE NOTICE that you have been found to be in violation of the City of Newark Ordinance ( 6S&FE amended March 21, 1990) governing hazardous materials:

Section 8.4

Section 10.1 B

Section 12.2

Section 15.1

Section 18.4

If you have any questions concerning this matter, please call: (201) 733 - 7495

Inspector

Date

Hazmat Officer

Date

*[Signature]*  
Officer in Charge Fire Prevention & Safety

Received by:

Date

866300107



**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 the recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected ground into the Passaic River.

866300108

2014854870

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 Chlorhydrin)

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. Private citizen reported this incident to the State Police.

866300109

2014534870

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.

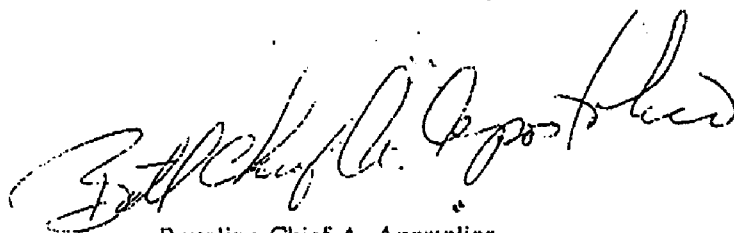
The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow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

866300110

**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:lm

866300111

## 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

attn: 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 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.

### **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 chlorhydrin.

866300112

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

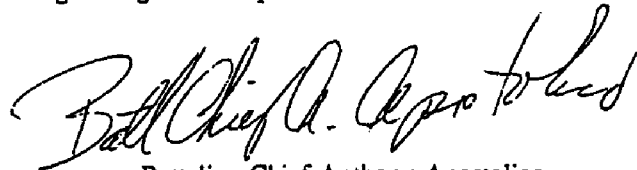
All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

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

866300113

DEQ-116  
4789

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

FIELD NOTICE OF VIOLATIONS

CASE NO. 92-01-07-1025 DATE 01/07/92  
CASE NAME CHEMICAL COMPOUNDS - ILEGAL DUMPING  
INCIDENT LOCATION PASSAIC RIVER - RIVERSIDE AVE - NEWARK  
RESPONSIBLE PARTY ADDRESS CHEMICAL COMPOUNDS  
29-75 Riverside Ave, Newark, N.J. 07104  
RESPONSIBLE PARTY REPRESENTATIVE AL CELLERT / HAROLD SULLIVAN

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.

- NJSA 58:10-23.11 C E SPILL COMPENSATION AND CONTROL ACT
- NJSA 23:5-28 POLLUTION AND OBSTRUCTION OF WATER
- NJAC 7-26 HAZARDOUS WASTE REGULATIONS
- 
- 

DESCRIPTION OF VIOLATION Discharge + non-notification of a discharge of a hazardous substance into the water and onto the land of the State of N.J. in violation of the provisions of the Spill Compensation and Control Act of the State of N.J.

Within immediately days of receipt of this notice, you shall submit in writing, to the address and investigator indicated below, an account of the incident and corrective measures taken to attain compliance.

Investigator Matthew Brammer  
Address NO DEP Emergency Response  
29-75 Riverside Ave Newark, NJ 07104

COPIES: White - File Yellow - Investigation Pink - Responsible Party

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

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 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.

Very truly yours,

*Stanley Delikat*  
 Stanley Delikat

*T. Weiner  
 OF STATE OF N.J.*



DEP-062A  
10/91

New Jersey Department of Environmental Protection and Energy

Check here if Revised Billing

**ENFORCEMENT INVOICE**

Document # \_\_\_\_\_  
Date Rec'd \_\_\_\_\_  
Amount \_\_\_\_\_

DIVISION B.P.S.R.

FACILITY ID NO. \_\_\_\_\_

PROGRAM EMERGENCY RESPONSE

TYPE:  Fine/Penalty  Cost Recovery

PROGRAM ID NO. 92-01-07-1025

Case/Company Name Chemical Compounds  
Address 29-75 Riverside Avenue  
Newark, NJ 07104

Please identify appropriate category:  
 County Authority  Industrial  
 Local  Regional  Commercial  
 Private  Local  Other -

DATE ASSESSED	DESCRIPTION	AMOUNT
2/7/92	ADMINISTRATIVE COST RECOVERY	\$708.60
DATE DUE: <u>March 26, 1992</u>	AMOUNT DUE:	\$708.60

Make check payable to: Treasurer, State of New Jersey

Mail to: NJDEPE, Bureau of Revenue  
CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

866300116

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

PROJECT ACTIVITY # TFF

Case Name: Chemical Compounds

CASE  
 I.D.NO. 92-01-07-1025-33

COST CALCULATION: \$708.60

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	OVERTIME RATE	HOURS	AMOUNT
M. Garamone	1/7/92	52.20	4.0	208.80	----	----	----
C. Gibbons	1/7/92	52.20	3.5	182.70	----	----	----
M. Garamone	1/9/92	52.20	2.0	104.40	----	----	(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			

Equipment:

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

866300117

1086

**Subpoena Duces Tecum  
Superior Court of New Jersey**

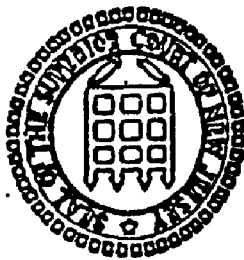
State of New Jersey )  
County of Mercer ) SA

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

TO: \_\_\_\_\_ R.J. Hughes Justice Complex  
25 Market St., 4th floor  
You are hereby commanded to appear at \_\_\_\_\_  
Friday  
In the City of Trenton on January 24th at 11:30 AM  
to give evidence before the State Grand Jury and you are ordered to appear without prepayment  
of witness fee and bring with you the following records: \_\_\_\_\_  
See Attached Schedule "A"

If you fail to appear and produce the said records, a warrant may be issued for your arrest  
and you may be charged with contempt.

WITNESS, the Honorable Samuel D. Lenox, Jr., Judge of the Superior Court,  
this 13th day of January, 1992.



Donald E. Phelan  
Donald E. Phelan  
Acting Clerk of the Superior Court

James W. Klassen  
James W. Klassen, DAG  
(609) 984-4470

Received this subpoena at Trenton on 1/17/92 and on 1/14/92  
at 29-75 Riverside Ave Newark I served it on the within named Harold Sullivan  
Bldg. 17  
by delivering a copy to him

Date 1/14/92

Sam L. Klassen  
DAG  
Signature and Title

866300118

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:
  - b. 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.
  - d. 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.

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.

866300119

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.
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 its facilities, into the Passaic Valley Sewerage Authority, including but not limited to analysis, correspondence and operating procedures.

866300120



State of New Jersey  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF CRIMINAL JUSTICE

ROBERT J. DEL TUFO  
ATTORNEY GENERAL

CH 086  
RICHARD J. HUGHES JUSTICE COMPLEX  
TRENTON, NEW JERSEY 08625-0086  
TELEPHONE: 609-964-8500

ROBERT T. WINTER  
DIRECTOR

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

New Jersey Is An Equal Opportunity Employer

866300121

TIERRA-B-004720



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

STATE OF NEW JERSEY            )  
                                  )  
                                  )  
                                  )  
                                  )  
                                  )  
CHEMICAL COMPOUNDS, INC.    )

ACCUSATION

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

866300123



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

**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:

1. 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.

866300125

THE LAW OFFICES OF JONATHAN H. ROTH

Mr. Harold E. Sullivan, President  
Mr. Alberto Calleri  
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.

866300126

TIERRA-B-004725

**CHEMICAL COMPOUNDS, INC.**  
 2976 RIVERSIDE AVENUE  
 NEWARK, NJ 07104

6235

September 9 19 92 65-2/212  
130

PAY TO THE ORDER OF TREASURY STATE OF NJ \$ 5,000.00

Five thousand and 00/100 ..... DOLLARS

**FIRST FIDELITY** First Fidelity Bank, N.A., New Jersey  
 Executive Office 130  
 550 Broad Street  
 Newark, N.J. 07102

FOR \_\_\_\_\_ *[Signature]*

⑈006235⑈ ⑆021200025⑆ 113 117266 1⑈

**CHEMICAL COMPOUNDS, INC.**  
 2976 RIVERSIDE AVENUE  
 NEWARK, NJ 07104

6236

September 9 19 92 65-2/212  
130

PAY TO THE ORDER OF ENVIRONMENTAL PROTECTION \$ 1,760.85

One thousand seven hundred sixty and 85/100 ..... DOLLARS

**FIRST FIDELITY** First Fidelity Bank, N.A., New Jersey  
 Executive Office 130  
 550 Broad Street  
 Newark, N.J. 07102

FOR \_\_\_\_\_ *[Signature]*

⑈006236⑈ ⑆021200025⑆ 113 117266 1⑈

866300127

DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF STATE POLICE

MP 71647

Municipal Court of \_\_\_\_\_  
 Superior Court, Special Part  
of ESSEX County, New Jersey

Docket # \_\_\_\_\_ Receipt # \_\_\_\_\_ Art. S. \_\_\_\_\_  
State of New Jersey vs. **SUMMONS** 0760

County of ESSEX  
YOU ARE HEREBY SUMMONED TO APPEAR PERSONALLY BEFORE THIS COURT AT THE TIME AND PLACE SPECIFIED BELOW TO ANSWER THE FOLLOWING VIOLATION(S):

On	Date	Mo	Yr	Day	Hour	AM	PM	
	<u>7-17-82</u>	<u>7</u>	<u>1982</u>	<u>10:45</u>	<u>10:45</u>	<u>X</u>		<u>1045</u>
Name	First (Print)		Initial		Last			
	<u>CHEMICAL COMPANY'S INC</u>							
Address	<u>2975 RIVERSIDE AVE.</u>							
City	<u>NEWARK</u>				State	<u>NJ</u>		
Telephone No.	Home		Business					
	<u>301-487-3211</u>							
Operators Lic. No.			State	Exp. Date				
Birth Date	Day	Mo	Yr	Eyes	Sex	Weight	Height	

DID UNLAWFULLY VIOLATE THE PROVISIONS OF  
N.J.S. 23:5-28 N.J.A.C. \_\_\_\_\_  
By committing the following violation(s) DID DRIVE OPERATOR COMPROMISED AUTO BEHIND RED LIGHT  
At or Upon PASSAIC RIVER  
In the Municipality of NEWARK County of ESSEX

Doc. #	Exp. Date	
Reg. #		
Name	Make	
Home City	State	Length
Port	Color	
Propulsion	Type	Color

YOU ARE NOTIFIED THAT THE UNDERSIGNED WILL FILE A COMPLAINT IN THIS COURT CHARGING YOU WITH THE VIOLATION(S) SET FORTH ABOVE.

1/7/82 Date MPD Ken Zwickler Signature of Complainant 940 Badge No.

Identification F010-Newark Bay

NOTICE: IF YOU INTEND TO PLEAD NOT GUILTY AND TO CONTEST THE CHARGE SPECIFIED IN THIS SUMMONS, AT LEAST 3 DAYS PRIOR TO THE DATE FIXED FOR YOUR APPEARANCE IN COURT, YOU MUST NOTIFY THE CLERK WHOSE ADDRESS AND TELEPHONE NUMBER IS SHOWN ON THE SUMMONS OF YOUR INTENTION. IF YOU FAIL TO DO NOTIFY THE CLERK IT MAY BE NECESSARY FOR YOU TO MAKE TWO COURT APPEARANCES.

Court Appearance Required  **YOU WILL BE NOTIFIED**  
Court Appearance \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_ at \_\_\_\_\_ M.  
Address of Court \_\_\_\_\_  
Court Telephone 301-223-6520

**SUMMONS** (Form approved May 25, 1982, pursuant to Rules 1:32-3, 4:70-3(a) & 7:3-1(b))

866300128



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 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 \$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.

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 Department of Environmental Protection and Energy

DEPE-062A

Check here if Revised Billing

**ENFORCEMENT INVOICE**

Document # \_\_\_\_\_  
Date Rec'd \_\_\_\_\_  
Amount \_\_\_\_\_

DIVISION R.P.S.R.

PROGRAM EMERGENCY RESPONSE

TYPE:  Fine/Penalty  Cost Recovery

FACILITY ID NO. \_\_\_\_\_

PROGRAM ID NO. 93-10-05-1110

Case/Company Name Chemical Compounds Inc.  
Address 29-75 Riverside Avenue  
Newark, NJ 07102

Please identify appropriate category:  
 County Authority:  Industrial  
 Local  Regional  Commercial  
 Private  Local  Other - Specify

DATE ASSESSED	DESCRIPTION	AMOUNT
11/12/93	ADMINISTRATIVE COST RECOVERY	\$866.47
DATE DUE:	DECEMBER 30, 1993	AMOUNT DUE: \$866.47

Make check payable to: Treasurer, State of New Jersey

Mail to: NJDEPE, Bureau of Revenue  
CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

866300130

12-3-93 - 11:30

*Sent 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  
93-10-05-1110

COST CALCULATION: \$866.47

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	O.T. RATE	HOURS	AMOUNT
B. Doyle	10/5/93	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

Reg. Total = 375.27

O.T. Total = 100.98

REPORT:

B. Doyle 10/5/93 64.43 4.0 257.72

Report Total = 257.72

EQUIPMENT:

Item:	Amount
HazCat	75.00
OVA	50.00
Drager Tubes	7.50

Equipment Total = 132.50

TOTAL AMOUNT DUE = \$866.47

866300131



FWE-009  
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. 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 RIVERSIDE AV. NEWARK, N.J. 07104

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 N.J.A.C. 7:26-9.3(a)3 - no  
accumulation slt rt date on containers  
9.7(c) - failing to describe the response actions  
9.7(e) - failing to describe arrangements with  
local authorities  
9.7(f) - no home addresses of emergency coordinators  
9.4(a)6i - no job title for each resident  
9.4(a)6ii - no written job description  
9.4(b)8 - no emergency drills conducted.

Remedial action to correct these violations must be initiated immediately and be completed by

OCT. 14. 94

Within fifteen (15) days of receipt of this Notice of Violation, you 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.

[Signature]  
Facility Receipt of Copy Only

[Signature]  
Investigator, Division of Facility Wide Enforcement  
Department of Environmental Protection & Energy

866300132

EWE-009  
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. 07052  
(201) 669-3900



**NOTICE OF VIOLATION**

ID NO. NJ 108661-737 DATE SEP 14 94  
NAME OF FACILITY CHEMICAL COMPOUNDS, Inc  
LOCATION OF FACILITY 29-75 RIVERSIDE AV. NEWARK, NJ 07104  
NAME OF OPERATOR ALBERTO PELLERi - 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 NJAC 7:26-9.6(f)1 - failure to  
familiarize local authorities  
9.6(f)3 - no agreements with emergency contractor  
9.6(f)4 - failure to familiarize local authorities  
9.6(f)5 - no file inspections

Remedial action to correct these violations must be initiated immediately and be completed by

Oct. 14, 94 Within fifteen (15) days of receipt of this Notice of Violation, you 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.

[Signature]  
Facility Receipt of Copy Only

[Signature]  
Investigator, Division of Facility Wide Enforcement  
Department of Environmental Protection & Energy

866300133



866300134

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

866300135

in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0038. Expires 6-30-

In case of an emergency or spill immediately call the state the emergency occurred in (609) 292-5558 (D-17) (609) 292-7172 (H-944)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJSD110191617137492017	Manifest Document No. 0765131	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
Generator's Name and Mailing Address CHEMICAL COMPOUNDS - 2775 RIVERVIEW AVE. ELSE 17 - NEWARK, NJ 07104			A. State Manifest Document Number <b>NJA 0765131</b>		
4. Generator's Phone (201) 495-3212	5. Transporter 1 Company Name FREEHOLD CARTRIDGE INC.		6. US EPA ID Number NJTD05412611017	B. State Generator's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Trans. ID 3-22931-1046	
9. Designated Facility Name and Site Address ECOFIO - 2750 PATRIOT ST GREENSBORO, NC 27407			10. US EPA ID Number NCSID970113131	D. Transporter's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. 24 METAL FLAMMABLE LIQUID (F003) UN1220			XXI	100	6
J. Additional Descriptions for Materials Listed Above METAL 80% WATER 20%			K. Handling Codes for Wastes Listed Above F003		
15. Special Handling Instructions and Additional Information A-12 ECC-009 JOB# C-0008 120F-001					
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 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 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.					
Printed/Typed Name			Signature		Month Day Year
17. Transporter 1 Acknowledgement or Receipt of Materials Printed/Typed Name: JOHN DANIELIC Signature: [Signature] Month Day Year: 10/13/90					
18. Transporter 2 Acknowledgement or Receipt of Materials Printed/Typed Name: Signature: Month Day Year:					
19. Discrepancy Indication Space (b) 11/1-2013 - Actually received 2,777 gallons GENERATOR DID NOT DATE					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name: THOMAS A. [Signature] Month Day Year: 10/13/90					





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

Form Approved, OMB No. 2000-0032, Expires 9-30-91

Please type or print in block letters. (Form designed for use on either (12-pitch) typewriter.)

In case of an emergency or spill immediately call the state emergency ac. and the N.J. Dept. of Environmental Protection. (609) 663-4800 (Day) (609) 262-7172 (Night)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC.</b> 27-75 RIVERSIDE AVE NEWARK N.J. 07102		1. Generator's US EPA ID No. NJ00114916471717171717		A. State Manifest Document Number <b>NJA-8869052</b>	
4. Generator's Phone (201) 485-3213		5. Transporter 1 Company Name <b>INC</b>		B. State Generator ID <b>8869052</b>	
6. Transporter 2 Company Name <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC.</b>		7. Transporter 1 US EPA ID Number NJ00114916471717171717		C. State Trans. ID 151131211	
8. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC.</b> 100 WATER AVENUE SUITE 100 WILMINGTON NJ 08401		9. Transporter 2 US EPA ID Number NJ00114916471717171717		D. Transporter's Phone (609) 485-3213	
10. US EPA ID Number NJ00114916471717171717		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM <b>NOT HAZARDOUS FOR U.S. DOT</b> <b>DYE WASTE WATER</b>		E. State Trans. ID 151131211	
12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
15. Additional Descriptions for Materials Listed Above <b>ALL HAZARDOUS WASTE</b> <b>ALL HAZARDOUS WASTE</b> <b>ALL HAZARDOUS WASTE</b>		16. Handling Codes for Wastes Listed Above <b>S01/K01</b>		17. Waste No.	
18. 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. 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 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.					
Printed/Typed Name <b>HAROLD E. SULLIVAN</b>		Signature <i>Harold E. Sullivan</i>		Month Day Year 10/09/96	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>GILBERT BUCK</b>		Signature <i>Gilbert Buck</i>		Month Day Year 10/09/96	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name <b>GILBERT BUCK</b>		Signature <i>Gilbert Buck</i>		Month Day Year 10/09/96	
19. Discrepancy Indication Space <b># 13 NIM 10110 007</b>					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>GILBERT BUCK</b>		Signature <i>Gilbert Buck</i>		Month Day Year 10/09/96	

EPA Form 8700-22 (Rev. 8/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

4 - TSD FACILITY COPY

866300137



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

Form Approved OMB No. 2060-0038 Expires 9-30-97

Please type or print in block letters. (Form designed for use on 8 1/2" x 11" typewriter.)

In case of an emergency or spill immediately call the state like emergency center and the N.J. Dept. of Environmental Protection. (609) 262-6000 (D-01) (609) 292-7175 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ010108441737801025	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC 29-75 MIKERSIDE AVE NEWARK NJ 07104			A. State Manifest Document Number NJ A 088028		B. State Generator's ID 3442	
4. Generator's Phone (201) 485-3212			C. State Trans. ID 1517193150		D. Transporter's Phone (908) 426-1111	
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT			E. State Trans. ID 1517193150		F. Transporter's Phone (908) 426-1111	
6. Transporter 2 Company Name			G. State Facility ID 1517193150		H. Facility's Phone (908) 426-1111	
7. Transporter 3 Company Name			I. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers	
8. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT INC 100 LISTER AVE. NEWARK NJ 07105			10. US EPA ID Number NJ010108441737801025		13. Total Quantity 11	
9. Designated Facility Name and Site Address			11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		14. Unit L	
10. US EPA ID Number			12. Containers		15. Waste No.	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) NON HAZARDOUS DYE WASH WATER NOT REGULATED BY 49 CFR			12. Containers No. Type		13. Total Quantity 11	
12. Containers			13. Total Quantity		14. Unit	
13. Total Quantity			14. Unit		15. Waste No.	
14. Unit			15. Waste No.		K. Handling Codes for Wastes Listed Above	
15. Waste No.			K. Handling Codes for Wastes Listed Above		L. Special Handling Instructions and Additional Information WATER 65% Decal 60731 CHEMICAL WASTE MANAGEMENT W/D # A-28831	
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 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 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.			Printed/Typed Name Harold E. Sullivan		Signature Harold E. Sullivan	
17. Transporter 1 Acknowledgement of Receipt of Materials			Printed/Typed Name Herbert Downey		Signature Herbert Downey	
18. Discrepancy Indication Space #1 is amended to 5245 About 60 gal left in Tank			Printed/Typed Name AUSA C 1002		Signature AUSA C 1002	
19. Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18.			Printed/Typed Name		Signature	

EPA Form 8700-22 (Rev. 8/86) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

866300138



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

Form Approved OMB No. 2050-0038 Expires 6-30-91

Please type or print in block letters. (Form designed for use on 11x17 (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <i>Chemical Concepts 24-75 Riverside Avenue Bldg 17 Newark, NJ 07102-3242</i>		1. Generator's US EPA ID No. <i>ATT000186611737</i>		4. State Manifest Document Number <i>NJ A 228360</i>	
5. Transporter 1 Company Name <i>Chemical Waste Management, Inc.</i>		6. US EPA ID Number <i>HT00019211671910</i>		7. State Manifest ID No. <i>HT00019211671910</i>	
7. Transporter 2 Company Name		8. US EPA ID Number		8. Transporter's Phone No.	
9. Designated Facility Name and Site Address <i>Chemical Waste Management of New Jersey, Inc. 100 Lister Avenue Newark, NJ 07105</i>		10. US EPA ID Number <i>HT00019211671910</i>		9. State Facility ID No.	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) <i>Non-Hazardous Dry Waste in Tank Not Regulated by HRCFR</i>		12. Containers No.	13. Total Quantity	14. Unit W/Vol	15. Waste No.
			<i>001 TX 5000 E</i>	<i>3910 0</i>	
16. Special Handling Instructions and Additional Information <i>Special Handling Instructions: Do not handle with bare hands. Use appropriate PPE. Do not eat, drink, or smoke in the area.</i>		17. Handling Codes for Wastes Listed Above <i>SD 10</i>			
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 labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: <i>Ricky Sabanovic</i> Signature: <i>Ricky Sabanovic</i> Month Day Year: <i>11/14/91</i>					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: <i>Herbert Donelson</i> Signature: <i>Herbert Donelson</i> Month Day Year: <i>11/03/91</i>					
19. Discrepancy Indication Space <i>Dr 3 amended to SD69</i>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name: <i>ALISA KOPPEL</i> Signature: <i>ALISA KOPPEL</i> Month Day Year: <i>10/21/91</i>					

In case of an emergency or spill, immediately call the state fire emergency center. (609) 292-5568 (24 hr) (609) 292-7172 (night)





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

EPA Approved, OMB No. 2050-0038, Expires 6-30-97

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

In case of an emergency or spill immediately call the state or emergency etc

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ01008661737	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Chemical Components Inc 47-15 Hillside Ave Newark, NJ 07104		4. Generator's Phone (201) 415-3242		State Manifest Document Number NJ-88864	
5. Transporter 1 Company Name Chemical Waste Management Inc		6. US EPA ID Number ILD109921021681		State Title ID NJ-10-301	
7. Transporter 2 Company Name		8. US EPA ID Number		State Title ID NJ-10-301	
9. Designated Facility Name and Site Address Chemical Waste Management of New Jersey, Inc 100 Lister Avenue, Newark, NJ 07105		10. US EPA ID Number NJ0005921167910		State Title ID NJ-10-301	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. NOT HAZARDOUS per US DOT Dye Waste Water		No. Type	001 TT 050906	2.900	
b.					
c.					
d.					
Additional Descriptions for Materials Listed Above Cyanide waste 10% Sulfate waste Dye waste		K Handling Codes for Wastes Listed Above D0101			
15. Special Handling Instructions and Additional Information K32692 W/O # A26095-A-27398		NJ DECAC# 60706 In case of emergency call 485-5242			
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 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 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.					
Printed/Typed Name Harold F. Sullivan		Signature Harold F. Sullivan		Month Day Year 09/11/91	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name David K. Kaman		Signature David K. Kaman		Month Day Year 02/21/91	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space \$ 13 Unreported to 4943					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name USAC Lopez					
Signature USAC Lopez		Signature USAC Lopez		Month Day Year 09/11/91	

EPA Form 8700-22 (Rev. 8/89) Previous editions are obsolete.

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866300140



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

866300141

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-

In case of an emergency or spill immediately call the state the emergency occurred (the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ ID 1101816611787121361	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC 29-75 RIVERSIDE AVE NEWARK NJ 07107			A. State Manifest Document Number <b>NJA 1228362</b>		B. State Generator's ID
4. Generator's Phone (201) 485-3212			C. State Trans. ID		D. Transporter's Phone (201) 465-3112
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT			6. US EPA ID Number		E. State Trans. ID
7. Transporter 2 Company Name			8. US EPA ID Number		F. Transporter's Phone
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF N.J. 100 LISTER AVE 110 WALKER ST NEWARK NJ 07102			10. US EPA ID Number		G. State Facility's ID
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM			12. Containers No.	13. Total Quantity	14. Unit (Wt/Vol) Waste No.
a. NOT HAZARDOUS PER US DOT DYE WATER			1	50	6 X 900
b. WATER 707					
14. Additional Descriptions for Materials Listed Above AMPHIPHILIC SURFACTANT			K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information UNO #33422 DECAT #12956					
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 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 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.					
Printed/Typed Name HARVEY S. LINDA		Signature		Month Day Year 10/13/1992	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name JACK FORTY		Signature		Month Day Year 10/13/1992	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name		Signature		Month Day Year	







State of New Jersey  
Department of Environmental Protection  
Division of Hazardous Waste Management  
Manifest Section  
CN1028 Trenton, NJ 08625

866300144

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In case of an emergency or spill immediately call the state the emergency occurred: N.J. Dept. of Environmental Protection, (609) 292-5500 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>MD101816611757009171</b>	2. Page <b>1</b> of <b>1</b>	3. Information in the shaded area is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL CORPORATION, INC. 2975 RIVERSIDE AVE. NEWARK NJ 07104</b>		4. Generator's Phone <b>(201) 485-3222</b>	5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT &amp; LOGISTICS, INC.</b>	6. US EPA ID Number <b>MD101816611757009171</b>
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT &amp; LOGISTICS, INC. 100 LISTER AVE. NEWARK N.J. 07105</b>		10. US EPA ID Number <b>MD101816611757009171</b>	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) <b>NON HAZARDOUS DYE WASH WATER HM</b>	12. Containers No. Type
14. Additional Descriptions for Materials Listed Above <b>22.4 L - Hydroxyethyl - Water 96.5% to 98.0%</b>		K. Handling Codes for Wastes Listed Above <b>507 P 1</b>		
15. Special Handling Instructions and Additional Information <b>Waste # A34537 # 12852</b>		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 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 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.		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Harold Sullivan</b>		Signature <b>Harold Sullivan</b> Month Day Year <b>03/1/89</b>		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Mike Maenza</b>		Signature <b>Mike Maenza</b> Month Day Year <b>03/1/89</b>		
19. Discrepancy Indication Space <b>13 amended to 2/305</b>		20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>William Lee</b> Signature <b>William Lee</b> Month Day Year <b>03/1/89</b>		



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

Please type or print in block letters. Form designed for use on 6 1/2 (12-pitch) typewriter.

N.J. Dept. of Environmental Protection, (609) 292-5560 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>MD 109161173702108</b>	2. Manifest Document No.	3. Page(s) of <b>1</b>	4. Information in the shaded area is required by Federal law, especially for Federal
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC 29-75 RIVERSIDE AVE. NEWARK, N.J. 07102</b>		5. Generator's Phone ( ) <b>201 485-3212</b>	6. State Manifest Document No. <b>NJ 109161173702108</b>	7. State Generator ID	
4. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT, INC</b>		8. Transporter 1 US EPA ID Number <b>IL D0992012681</b>	9. State Transporter ID	10. Transporter's Phone ( ) <b>708-365-3212</b>	
7. Transporter 2 Company Name		8. Transporter 2 US EPA ID Number	9. State Transporter ID	10. Transporter's Phone ( )	
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT - NEWARK DISPOSAL 700 LISTER AVE. NEWARK, N.J. 07102</b>		10. US EPA ID Number <b>MD 109161173702108</b>	11. State Facility ID	12. Facility's Phone ( ) <b>973-910-9100</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <b>NON-HAZARDOUS PER U.S. DOT DYE WASTE WATER</b>		101	101	5	1000
b. <b>THIS IS PAID SYSTEM #2 WATER</b>					
J. Additional Descriptions for Materials Listed Above <b>2,2,4,4-Tetrahydroxyethyl-2-nitroacetone Acetic acid</b>		K. Heading Codes for Wastes Listed Above <b>SOD H01</b>			
L. Special Handling Instructions (see Appendix A for format) <b>DECAL # 12852</b>		Waste Profile <b>32692-K-32692</b>			
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 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 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.					
Printed/Typed Name <b>Harold E. Sullivan</b>		Signature <i>Harold E. Sullivan</i>		Month Day Year <b>12/21/1992</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>FRANK T. BARONE</b>		Signature <i>Frank T. Barone</i>		Month Day Year <b>12/21/1992</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>Includes (4), (9), (10) + 15 amended per discussion with Harold Sullivan 2/20/92 # 13 Amended to 10/19/93</b>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>ANISA C. PERAZ</b>		Signature <i>Anisa C. Peraz</i>		Month Day Year <b>12/21/1992</b>	

USEPA Form #700-27 (Rev. 6/88) Previous editions are obsolete.







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

866300147

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

N.J. Dept. of Environmental Protection, (609) 292-5560 (Day), (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ D 1081616173718009	2. Manifest Document No.	3. Page No.	4. Information in the shaded area is required by Federal Law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC 29-75 RIVERSIDE AVE NEWARK NJ 07104		5. State Manifest Document Number NJ A 8945		6. State Generator ID	
4. Generator's Phone (201) 485-3212		7. US EPA ID Number		8. State Transfer ID	
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT INC		9. US EPA ID Number NJ D 0919202681		10. State Transfer ID	
7. Transporter 2 Company Name MANAGEMENT		8. US EPA ID Number		9. State Transfer ID	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC 100 LISTE AVE. NEWARK N.J 07105		10. US EPA ID Number NJ D 08192116790		11. State Facility ID	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. NON-HAZARDOUS PER U.S. DOT DIVE WASTE WATER		0101	1105000	G X 190	
b. NOT REGULATED BY 49 CFR					
c.					
d.					
16. Additional Descriptions for Materials Listed Above WATER 70 L ACETIC ACID 100 L ACETIC ACID 100 L ACETIC ACID 100 L		17. Handling Codes for Wastes Listed Above S1 H01			
15. Special Handling Instructions and Additional Information D. J. # 33000 DECAL # 12852		18. WASTE PROFILE # K 32012			
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, packaged, 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 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.		Printed/Typed Name HAROLD E SULLIVAN		Signature [Signature]	Month Day Year 12 23 97
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name MIKE MAENZA		Signature [Signature]	Month Day Year 02 25 98
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name [Name]		Signature [Signature]		Month Day Year 02 25 98	





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

866300148

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

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N.J. Dept. of Environmental Protection, (609) 292-5540 (Day) (609) 292-7172 (Night)

In case of an emergency or spill immediately call the state the emergency occurred in

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 01081661737010	Manifest Document No. 010	2. Page 1 of 1	Information in the shaded area is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE, BLDG. 12, NEWARK, NJ 07104</b>				A. State Manifest Document Number <b>NJA 1379017</b>	B. State Generator's ID <b>SAME</b>
4. Generator's Phone <b>201 485-3212</b>				C. State Trans. ID <b>01031</b>	D. Transporter's Phone <b>201 485-3212</b>
5. Transporter 1 Company Name <b>Chemical Waste Management INC.</b>				6. US EPA ID Number <b>0108080501</b>	E. State Trans. ID <b>01031</b>
7. Transporter 2 Company Name				8. US EPA ID Number	F. Transporter's Phone
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVE., NEWARK, NEW JERSEY 07105</b>				10. US EPA ID Number <b>NJD089216790</b>	G. State Facility's ID <b>010</b>
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) <b>HM</b>				12. Containers No.	13. Total Quantity
a. <b>NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR</b>				14. Unit Wt/Vol	15. Waste No.
b. <b>CONTAINS WATER - 65 to 70%</b>				K. Handling Codes for Wastes Listed Above <b>S02 H01</b>	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above	
a. <b>AMMONIUM ACETATE - 100</b>				b. <b>S02 H01</b>	
c. <b>AMMONIUM SULFATE - 110</b>				c. <b>S02 H01</b>	
d. <b>ACETIC ACID - 140</b>				d. <b>S02 H01</b>	
e. <b>AMINES - 100</b>				e. <b>S02 H01</b>	
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. A-33808      PROFILE NO. K32532 DECAL NO. 20253</b>					
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 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 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.					
Printed/Typed Name <b>HAROLD E. SULLIVAN</b>		Signature <i>[Signature]</i>		Month Day Year <b>10/31/92</b>	
17. Transporter 1 Acknowledgment of Receipt of Materials Printed/Typed Name <b>Vernon Battles</b>		Signature <i>[Signature]</i>		Month Day Year <b>10/31/92</b>	
18. Transporter 2 Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space <b>Section 13 amended to 2435</b>					
Printed/Typed Name <b>[Name]</b>		Signature <i>[Signature]</i>		Month Day Year <b>1/7/93</b>	



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

866300149

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

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In case of an emergency or spill immediately call the state the emergency occurred!  
(the N.J. Dept. of Environmental Protection, (609) 262-5589 (Day) (609) 862-7172 (Night))

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. 4-3-91-00-0000-0000-0000	Manifest Document No.	2. Page 1 of 1	Information in its shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE, BLDG.17, Newark, NJ 07104</b>			A. State Manifest Document Number <b>NJA 1379018</b>		B. State Generator's ID <b>SAME</b>
4. Generator's Phone 201-435-3212	5. Transporter 1 Company Name <i>Chemical Waste Management Inc</i>		6. US EPA ID Number	C. State Trans. ID 01010000000000000000	D. Transporter's Phone 201-465-2112
7. Transporter 2 Company Name <i>SAME CHEMICAL WASTE MANAGEMENT INC</i>			8. US EPA ID Number	E. State Trans. ID 01010000000000000000	F. Transporter's Phone 201-465-2112
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY 100 LISTER AVE., NEWARK, NEW JERSEY 07102</b>			10. US EPA ID Number 1-33-01-0-19-11-5-79-5		G. State Facility's ID
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol Waste No.
a. NON-HAZARDOUS DYE WASTE WATER NOT REGULATED BY 49CFR			0 0 1	44 0 0 0 0 0	X 9 0 0
J. Additional Descriptions for Materials Listed Above WATER 51 to 53.03 2,2'-[1,4-2 (Hydroxyethyl)Amino]-2-Nitrophenyl]Emino]Diethanol This is a Hair Dye RC-BLUE NO. 2			K. Handling Codes for Wastes Listed Above S03 H01		
15. Special Handling Instructions and Additional Information WORK ORDER NO. <u>A-33973</u> WASTE PROFILE NO. <u>K-32525</u> DECAL NO. <u>16845 12855</u>					
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 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 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.					
Printed/Typed Name <b>Harold E. Sullivan</b>		Signature <i>Harold E. Sullivan</i>		Month Day Year 10/2/79	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name <b>Vernon Bowler</b>		Signature <i>Vernon Bowler</i>		Month Day Year 10/2/79	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name <b>Jack Feisty</b>		Signature <i>Jack Feisty</i>		Month Day Year 10/31/79	
19. Discrepancy Indication Space <i>Section 13 amended to 1304</i>					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name <b>WISAC KOTAS</b>		Signature <i>WISAC KOTAS</i>		Month Day Year 10/19/79	



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

866300150

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

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The N.J. Dept. of Environmental Protection, (609) 292-5566 (Day) (609) 942-7172 (Night)

In case of an emergency or spill immediately call the state the emergency occurred

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. 071095		Manifest Document No. 866300150		Page 1 of 1		Information in the shaded area is not required by Federal law.			
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-79 RIVERSIDE AVE, BLDG. 17, Newark, NJ 07104						A. State Manifest Document Number <b>NJA 1379018</b>					
4. Generator's Phone (201) 435-3212				6. US EPA ID Number NAME							
5. Transporter 1 Company Name Chemical Waste Management Inc						C. State Trans. ID					
7. Transporter 2 Company Name SAME CHEMICAL WASTE MANAGEMENT						D. Transporter's Phone (201) 465-2122					
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF NEW JERSEY 100 LISTER AVE. NEWARK, NEW JERSEY 07105						10. US EPA ID Number 201-465-9100					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) NON-HAZARDOUS DYE WASTE/WATER NOT REGULATED BY 49CFR						12. Containers No. Type		13. Total Quantity		14. Unit (Lit./Vol) Waste No.	
J. Additional Descriptions for Materials Listed Above 2,2'-[1,4-2-(Hydroxyethyl)Amino]-2-Nitrophenyl]Imino]Diethanol This is a Hair Dye RC-BLUE NO. 2						K. Handling Codes for Wastes Listed Above S01 H01					
15. Special Handling instructions and Additional Information WORK ORDER NO. A-33873 WASTE PROFILE NO. K-32525 DECAL NO. 12845 12855											
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 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 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.											
Printed/Typed Name Harold E. Sullivan				Signature <i>[Signature]</i>		Month Day Year 10/2/79					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Vernon Ballia				Signature <i>[Signature]</i>		Month Day Year 10/2/79					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Jack Easty				Signature <i>[Signature]</i>		Month Day Year 10/3/79					
19. Discrepancy Indication Space Section 13 amended to 1304											
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name THOMAS R. POPE				Signature <i>[Signature]</i>		Month Day Year 10/19/79					





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

866300152

Form Approved. OMB No. 2050-0039. Expires 6-30-91

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE, BLDG. 17, NEWARK, NJ 07104		4. Generator's Phone (201) 495-3212	6. US EPA ID Number	A. State Manifest Document Number NJ A 0869033	B. State Generator's ID SAME
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC.		7. Transporter 1 Company Name	8. US EPA ID Number	C. State Trans. ID 610931	D. Transporter's Phone 201 465-2121
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVE. NEWARK, NJ 07102		10. US EPA ID Number	12. Containers	E. State Trans. ID	F. Transporter's Phone
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR		12. Containers	13. Total Quantity	G. State Facility's ID	H. Facility's Phone
J. Additional Descriptions for Materials Listed Above WATER 95 SA to 99 95 2,2'-[[[4-(2-Hydroxyethyl)Amino]-2-Nitrophenyl]Imino]Diethanol THIS IS A HAIR DYE HC-BLUE NO. 2		K. Handling Codes for Wastes Listed Above S0/H0			
15. Special Handling Instructions and Additional Information WORK ORDER NO. 34070 WASTE PROFILE NO. K-32525 DECAL NO. 12963					
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 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 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.					
Printed/Typed Name HAROLD E. GULLIVAN		Signature		Month Day Year 10/26/87	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name LUKE DATTAN		Signature		Month Day Year 10/26/87	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space #13 amended to 4600					
20. Facility Owner or Operator: Certification of receipt of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name RICHARD COLE		Signature		Month Day Year 10/26/87	

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5566 (Day) (609) 292-7172 (Night)



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

866300153

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

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104</b>						A. State Manifest Document Number <b>NJA 1379022</b>							
4. Generator's Phone ( )						B. State Generator's ID							
5. Transporter 1 Company Name <b>435-3212</b>						C. State Trans. ID							
6. US EPA ID Number						D. Transporter's Phone ( )							
7. Transporter 2 Company Name						E. State Trans. ID							
8. US EPA ID Number						F. Transporter's Phone ( )							
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY 100 LISTER AVENUE NEWARK, NEW JERSEY 07102</b>						G. State Facility's ID							
10. US EPA ID Number						H. Facility's Phone ( )							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>NON-HAZARDOUS DYE WASTE WATER NOT REGULATED BY 49CFR</b>						3		43		47		3	
b.													
c.													
d.													
J. Additional Descriptions of Materials Listed Above <b>2,2'-[[4-(2-Hydroxyethyl)amino]-2-Nitrophenyl]imino]Diethanol This is a Hair Dye HC-BLEED NO. 7</b>						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. 3-35082 WASTE PROFILE NO. X-32525 DETAIL NO. 12863</b>													
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 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 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.						Printed/Typed Name <b>David E. Sullivan</b>		Signature <i>David E. Sullivan</i>		Month Day Year <b>10 14 92</b>			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name <b>George E. Sullivan</b>		Signature <i>George E. Sullivan</i>		Month Day Year <b>10 14 92</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name		Signature		Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Printed/Typed Name		Signature		Month Day Year			

[Initial] 2117-227 (Rev. 9/88) (Print) (Once per form) (Once per container)

NJ 1379022



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

866300154

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.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <u>071001001</u>	Manifest Document No. <u>0010</u>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, Newark, NJ 07104</b>		4. Generator's Phone ( <u>201</u> ) <u>485-3313</u>	6. US EPA ID Number	A. State Manifest Document Number <b>NJA 1379023</b>	B. State Generator ID
5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC</b>		7. Transporter 2 Company Name	8. US EPA ID Number	C. State Trans. ID	D. Transporter's Phone
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVENUE NEWARK, NEW JERSEY 07102-0705</b>		10. US EPA ID Number	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	E. State Trans. ID	F. Transporter's Phone
GENERATOR	a.	NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR	12. Containers No. <u>20</u>	13. Total Quantity <u>2000</u>	Unit <u>gals</u>
	b.				
	c.				
	d.				
	e.	CONTAINS WATER - 65 to 70%			
J. Additional Descriptions for Materials Listed Above		AMMONIUM ACETATE - <u>100</u>	AMMONIUM SULFATE - <u>110</u>	ACETIC ACID - <u>140</u>	AMINES - <u>100</u>
K. Handling Codes for Wastes Listed Above		<u>S0010</u>			
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. A-30000 24008</b> <b>DECAL NO. 12850</b>		<b>PROFILE NO. K32592</b>			
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 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 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.					
Printed/Typed Name <b>THOMAS E. SULLIVAN</b>		Signature <i>Thomas E. Sullivan</i>		Month Day Year <u>10/12/92</u>	
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Vernon Battles</b>		Signature <i>Vernon Battles</i>		Month Day Year <u>10/12/92</u>
	18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year
FACILITY	19. Discrepancy Indication Space <u>13 Discrepancy to 30730</u>				
	20. Facility Owner/Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>USIA</b>		Signature <i>USIA</i>		Month Day Year <u>10/12/92</u>

In case of an emergency or spill immediately call the state the emergency occur and the N.J. Dept. of Environmental Protection. (609) 292-6500 (day) (609) 292-7172 (night)



State of New Jersey  
Department of Environmental Protection  
Division of Hazardous Waste Management  
Manifest Section  
CN 02B, Trenton, NJ 08625

866300155

Form Approved, OMB No. 2050-0039, Expires 9-30-85

Please type or print in block letters. (Form designed for use on ellipse (12-pitch) typewriter.)

M.J. Dept. of Environmental Protection, (609) 292-5560 (Day) (609) 292-7172 (Night)

In case of an emergency or spill immediately call the state emergency number

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ 01 01 01 86 6 1 7 47 0 0 2 1 1		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104		6. US EPA ID Number		A. State Manifest Document Number NJ 137002		B. State Generator's ID		C. State Trans. ID	
4. Generator's Phone (201) 495-3212		7. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT NJ		8. US EPA ID Number		D. Transporter's Phone		E. State Trans. ID	
5. Transporter 2 Company Name		9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF NEW JERSEY 100 LISTER AVENUE NEWARK, NEW JERSEY 07105		10. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM a. NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY RCRA b. c. d. WATER 96.58 to 98.04		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
J. Additional Descriptions for Materials Listed Above 2,2' - [(4-2 (HYDROXYETHYL)AMINO)-2-NITROPHENYL]IMINO]DIETHANOL THIS IS A Hair Dye - RC-BLUE NO. 2		K. Handling Codes for Wastes Listed Above		16. Special Handling Instructions and Additional Information WORK ORDER NO. A-36009 DECR NO. 12552 WASTE PROFILE NO. X-32525		17. 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. 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 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.		Printed/Typed Name Signature Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials		19. Discrepancy Indication Space		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Signature Printed/Typed Name Month Day Year	





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

866300156

Form Approved. GSA

Please type or print in block letters. (Form designed for use on 11lb (12-pitch) typewriter.)

In case of an emergency or spill immediately call the state emergency number (609) 292-5540 (Day) (609) 282-7172 (Night)

1. Generator's US EPA ID No. <b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		Manifest Document No.	2. Page 1 of	Information is not law in the shaded areas required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE., BLDG. 17, NEWARK, NJ 07104</b>		A. State Manifest Document Number <b>NJA 13</b>		
4. Generator's Phone ( ) <b>908 485 3212</b>	5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT INC.</b>	US EPA ID Number <b>IL ID 0992021681</b>	B. State Generator's ID Number <b>9020</b>	
7. Transporter 2 Company Name	8. US EPA ID Number	C. State Trans. ID		
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVENUE NEWARK, NEW JERSEY 07105</b>	10. US EPA ID Number	D. Transporter's Phone ( )		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. <b>NON-HAZARDOUS DYE WASH WATER NOT REGULATED BY 49CFR</b>				
b.				
c.				
d.				
e. <b>CONTAINS WATER 65 to 70%</b>				
f. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		
g. <b>AMMONIUM ACETATE 10%</b>		S01 H01		
h. <b>AMMONIUM SULFATE 11%</b>				
i. <b>ACETIC ACID 14%</b>				
j. <b>ANINES 10%</b>				
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. A36057 PROFILE NO. K-32692</b> <b>DECAL NO. 40257</b>				
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 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 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.				
Printed/Typed Name <b>Harold E. Sullivan</b>		Signature	Month Day Year <b>1 21 79</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>MANUEL DE DEINA</b>		Signature	Month Day Year <b>1 21 79</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature	Month Day Year	
19. Discrepancy Indication Space <b>13 items listed to 4401</b>				
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>WALTER POTER</b>		Signature	Month Day Year <b>1 21 79</b>	

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES





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

866300158

Form Approved OMB No. 2050-0039 Expires 9-30-93

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

In case of an emergency or spill immediately call the state the emergency occurred in  
NJ Dept. of Environmental Protection (609) 292-5540 (Day) (609) 292-7172 (Night)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ 001 88 6 1 7 3 7 0 3 0 0 1	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVH., BLDG. 17, NEWARK, NJ 07104</b>		4. Generator's Phone (201) 195-3212	5. Transporter 1 Company Name <b>CHEMICAL WASTE MANAGEMENT INC.</b>	6. US EPA ID Number	A. State Manifest Document Number <b>NJA 1878948</b>
9. Designated Facility Name and Site Address <b>CHEMICAL WASTE MANAGEMENT OF NEW JERSEY, INC. 100 LISTER AVENUE NEWARK, NEW JERSEY 07105</b>		10. US EPA ID Number NJ 001 98 1 92 1 6 7 1 9 0	7. Transporter 2 Company Name	8. US EPA ID Number	B. State Generator's ID <b>STATE</b>
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM <b>NON-HAZARDOUS DYE WASTE WATER NOT REGULATED BY 49CFR</b>		12. Containers No. Type	13. Total Quantity	Unit (W/Vol)	Waste No.
J. Additional Descriptions for Materials Listed Above <b>2,2'-[[4-(2-Hydroxyethyl)Amino]-2-Nitrophenyl]Imino]Diethano-</b> <b>THIS IS A HIGH DYE RC-BEUSE NO. 1</b>		K. Handling Codes for Wastes Listed Above <b>30/10</b>			
15. Special Handling Instructions and Additional Information <b>WORK ORDER NO. 37/21 WASTE PROFILE NO. K-3225</b> <b>DTCAL NO. 12850</b>					
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 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 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.					
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name <b>MIKE MAENZA</b>		Signature <i>[Signature]</i>	Month Day Year <b>10/5/1992</b>
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of Receipt of Hazardous Materials Covered by this Manifest except as noted in Item 19.					
Printed/Typed Name <b>MARISOL CRUZ</b>		Signature <i>[Signature]</i>		Month Day Year <b>10/5/1992</b>	

3-999-001 (REV. 8/88)



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

866300159

3,886 gals received

Use type or print in block letters. (Form designed for use on 6 1/2 (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (800) 282-5560 (Day) (609) 292-7172 (Night)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>VA10110191611700719</b>		Manifest Document No. <b>19</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>CHEMICAL COMPOUNDS INC</b> <b>28-75 RIVERSIDE AVE.</b> <b>NEWARK, NJ 07104</b>						A. State Manifest Document Number <b>NJA 0936735</b>							
4. Generator's Phone <b>(201) 425-9111</b>						B. State Generator's ID <b>S011</b>							
5. Transporter 1 Company Name <b>Oldover Corporation</b>				6. US EPA ID Number <b>VA1010140111519436</b>		C. State Trans. ID <b>MSDBR5171157</b>							
7. Transporter 2 Company Name						D. Transporter's Phone <b>(856) 792-7131</b>							
9. Designated Facility Name and Site Address <b>Alford Corporation</b> <b>SP RK 652</b> <b>SPVON 124 VA 23004</b>						E. State Trans. ID <b>MSDBR5171157</b>							
10. US EPA ID Number <b>VA101019314131443</b>						F. Transporter's Phone <b>(856) 792-7131</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>RM WASTE FLAMMABLE LIQUID N.O.S.</b>						No.		4000				<b>0001</b>	
b. <b>FLAMMABLE LIQUID UN193</b>						Type		gals		gals		<b>0003</b>	
c. <b>METHANOL, ISOPROPYL ALCOHOL</b>								11:45 gal		9.31		<b>053860</b>	
d.												<b>051151</b>	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
<b>METHANOL 40%</b>						<b>9-C1-T-18 Light wt Aggregate</b>							
<b>XYLENE 5%</b>													
<b>ISOPROPYL ALCOHOL 40%</b>													
<b>ETHYL ACETATE 5%</b>													
15. Special Handling Instructions and Additional Information													
<b>PROFILE NUMBER 1048</b>						<b>EMERGENCY RESPONSE# (201) 485-3212</b>							
<b>PO#-CCI729</b>						<b>GUIDE# 27, TRAILER BECAL #45249</b>							
						<b>PHONE 43263</b>							
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 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 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.													
Printed/Typed Name <b>BAROLD W. SITI 1114</b>						Signature <i>[Signature]</i>						Month Day Year <b>10/1/91</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <b>GEORGE BENZER</b>						Signature <i>[Signature]</i>						Month Day Year <b>10/1/91</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 15.													
Printed/Typed Name <b>Maria C. Christian</b>						Signature <i>[Signature]</i>						Month Day Year <b>10/1/91</b>	





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

866300161

12-14-93

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>NJDI08661737</b>	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Chemical Compounds 2975 Riverside Avenue Newark</b>		Attn: <b>Peggy Schroeder NJ 07104</b>		State Manifest Document Number <b>AR 06 4003</b>	
4. Generator's Phone <b>201-485-1717</b>	5. Transporter 1 Company Name <b>Tri-State Motor Transit Co.</b>		6. US EPA ID Number <b>MOD095038998</b>	7. State Manifest Document Number <b>AR 06 4003</b>	
7. Transporter 2 Company Name		8. US EPA ID Number		9. State Manifest Document Number	
9. Designated Facility Name and Site Address <b>Rineco 1007 Vulcan Rd. -Haskell Benton, AR 72015</b>		10. US EPA ID Number <b>ARD981057870</b>		11. State Manifest Document Number <b>501-78-9089</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Waste Chloroform Mixture 6.1 UN1888 PGII		1	DM	55G	NON-RCRA
b. Non-Regulated Material (Motor Oil)		1	DM	55G	NON-RCRA
c. Non-Regulated Material (Dye)		13	DM	165G	NON-RCRA
d.					
17. Additional Classification for Material (See 49 CFR 173.13)		18. Additional Classification for Material (See 49 CFR 173.13)		19. Handling Codes for Hazardous Waste (See 49 CFR 173.13)	
<b>9309-11419 SERG#55</b>		<b>9309-8935</b>		<b>Load# 3553</b>	
15. Special Handling Instructions and Additional Information <b>New Jersey Transporter Hazardous ID # DEPE 50083 New Jersey Trailer ID # DEPE 50083</b>		EMERGENCY RESPONSE INFORMATION <b>Peggy Schroeder 201-485-1717</b>			
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 labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state 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 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.		17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: <b>ALBERTO CELLERI</b> Signature: <i>[Signature]</i> Month Day Year: <b>12 1 493</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: <b>JAMES M. PEARSON</b> Signature: <i>[Signature]</i> Month Day Year: <b>12 1 493</b>		19. Discrepancy Indication Space			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest as noted in item 19. Printed/Typed Name: <b>GARY VILE</b> Signature: <i>[Signature]</i> Month Day Year: <b>12 1 1993</b>					

AH-8-83

GENERATOR

TRANSPORTER

RECEIVER

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.  
 NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT, ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

866300162

**NON-HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No. N.J.D1 0-8-66-I-7-37 Manifest Document No. 0659 2. Page 1 of 1

3. Generator's Name and Mailing Address Chemical Compounders  
29-75 Riverside Ave.  
Newark, N.J. 07104

4. Generator's Phone (201) 485-3211

5. Transporter 1 Company Name Laidlaw Environmental Services 6. US EPA ID Number M.DD-9-8-05-5-46-5-3

7. Transporter 2 Company Name \_\_\_\_\_ 8. US EPA ID Number \_\_\_\_\_

9. Designated Facility Name and Site Address Laidlaw Environmental Services  
3527 Whiskey Bottom Road  
Laurel, Md. 20724 10. US EPA ID Number M.DD-9-80-5-5-46-53

A. Transporter's Phone (301) 953-9583  
B. Transporter's Phone \_\_\_\_\_  
C. Facility's Phone 301-953-9583

11. Waste Shipping Name and Description	12. Containers		13. Total Quantity	14. Unit Wt/Vol
	No.	Type		
a. <u>NON-HAZARDOUS WASTE (NON-REGULATED MATERIAL)</u>	<u>13</u>	<u>DF</u>	<u>715</u>	<u>Gal</u>
b. _____	_____	_____	_____	_____
c. _____	_____	_____	_____	_____
d. _____	_____	_____	_____	_____

D. Additional Descriptions for Materials Listed Above PROCESS WATER

E. Handling Codes for Wastes Listed Above \_\_\_\_\_

15. Special Handling Instructions and Additional Information PROFILE NO. 6-CEM-001

In Case of Emergency contact: CHEM-TREC 1-800-424-9300

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name ALBERTO CELLERI Signature [Signature] Month 12 Day 12 Year 94

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name ERIC BLOTTENBERGER Signature [Signature] Month 12 Day 12 Year 94

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

19. Discrepancy Indication Space \_\_\_\_\_

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19. SEC. II, LAQ-CORRECTED AT LAUREL FACILITY 4/15/94 AT LAUREL FACILITY 4/15/94

Printed/Typed Name TIMOTHY KESLAR Signature [Signature] Month 10 Day 15 Year 94

GENERATOR  
TRANSPORTER  
FACILITY

ORIGINAL RETURN TO GENERATOR

MAIL TO OR CALL 1-800-368-3000

866300163



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

Shipped 5-27-94 8:00 (let for '94)

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

UNIFORM HAZARDOUS WASTE MANIFEST. Includes sections for Generator's Name and Mailing Address, Generator's Phone, Transporter 1 and 2 Company Names, Designated Facility Name and Site Address, US DOT Description, Containers, Handling Codes, and Generator's Certification.

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172

GENERATOR

TRANSPORTER

ACTIVITY





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

866300164

1

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

Please print clearly. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD108661737</b>	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Chemical Compounds 2975 Riverside Ave. Newark</b>		Attn: Peggy Schroeder <b>NJ 07104</b>		A. State Manifest Document Number <b>AR 708989</b>	
4. Generator's Phone <b>201-485-1717</b>		6. US EPA ID Number		C. State Transporter ID Number <b>165-99478</b>	
5. Transporter 1 Company Name <b>Maumee Express</b>		8. US EPA ID Number <b>NJD198161071380</b>		E. State Transporter ID Number <b>308-271-0520</b>	
7. Transporter 2 Company Name		10. US EPA ID Number		G. State Transporter ID Number	
9. Designated Facility Name and Site Address <b>Rineco 1007 Vulcan Rd.-Haskell Benton, AR 72015</b>		10. US EPA ID Number <b>ARD981057870</b>		H. Facility Phone <b>501-778-9089</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. <b>7</b> Type <b>DM</b>	13. Total Quantity <b>39.5G</b>	14. Unit WT/Vol	Waste No.
a. <b>Non-Regulated Material (Dye)</b>					<b>NON-RCRA</b>
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above <b>9309-8935</b>		K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION</b> <b>Peggy Schroeder</b> <b>201-485-1717</b>			
If no alternate TSD facility, return to generator.		Load # <b>516</b>			
15. Special Handling Instructions and Additional Information					
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 labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state 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 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.					
Printed/Typed Name <b>Peggy Schroeder</b>		Signature <i>Peggy Schroeder</i>		Month Day Year <b>07/12/94</b>	
17. Transporter 1 Acknowledgment of Receipt of Materials Printed/Typed Name <b>Daniel Heath</b>		Signature <i>Daniel Heath</i>		Month Day Year <b>07/12/94</b>	
18. Transporter 2 Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 18. Printed/Typed Name <b>RAUL C. PEACAN</b>		Signature <i>Raul C. Peacan</i>		Month Day Year <b>07/15/94</b>	

AR 2 94

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.  
 NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.



866300165

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

Shipped 8-19-94  
End of 8:00

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-

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ010866173703733	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE. NEWARK, N.J. 07104			A. State Manifest Document Number NJ A 1903133		
4. Generator's Phone (201) 485-3211			B. State Generator's ID (Gen. Site Address) SAFE		
5. Transporter 1 Company Name OLDOVER CORP.		a. US EPA ID Number VAD040157436		C. State Trans. ID-NJDEPE 7157	
7. Transporter 2 Company Name		8. US EPA ID Number		Decal No. 53098	
9. Designated Facility Name and Site Address OLDOVER CORP. RT. 1 STATE RD. 652 ARVONIA, VA. 23004			10. US EPA ID Number VAD0918443443		
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) a. X RW WASTE FLAMMABLE LIQUID, N.O.S., 3, (METHANOL, TOLUENE) UN1993, PG II			12. Containers No. Type		13. Total Quantity 14. Unit Wt/Vol 15. Waste No.
			001 TTG 1250 G		D001 F003 F005
J. Additional Descriptions for Materials Listed Above METHANOL, TOLUENE, ISOPROPYL ALCOHOL, WATER AND LIT E.I. TRICHLOROETHANE LIT			K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information EMERGENCY PHONE (201) 485-3211 GUIDE BOOK ID-27					
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 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 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.					
Printed/Typed Name		Signature		Month Day Year 08/19/94	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year 08/19/94	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name		Signature		Month Day Year	

In case of an emergency or spill, immediately call the state the emergency or call in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172



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

866300166

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-

Printed in and the N.J. Dept. of Environmental Protection and Energy. (609) 282-7172  
 Only call the state the emergency.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ130110161617131745920	Manifest Document No. 45920	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Chemical Compounds, Inc. 29-75 Riverside Avenue Newark, NJ 07104			A. State Manifest Document Number <b>NJA 2028013</b>		
4. Generator's Phone (201) 485-3211			B. State Generator's ID (Gen. Site Address)		
5. Transporter 1 Company Name Frank's Vacuum Truck Service, Inc.		6. US EPA ID Number h h h h h h h h h h		C. State Trans ID-NJDEPE 0501115	
7. Transporter 2 Company Name		a. US EPA ID Number		D. Transporter's Phone 0606111	
9. Designated Facility Name and Site Address Research Oil Company 2655 Transport Road Newark, NJ 07104		10. US EPA ID Number		E. State Trans ID-NJDEPE 0501115	
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, HM ID Number and Packing Group) Hazardous Waste Solid, n.o.s. (Chlorobenzene), 9, MA3077, PGIII, RC(D001, R002)			12. Containers No. Type	13. Total Quantity	14. Unit (WV) Waste No.
d. X Hazardous Waste Solid, n.o.s. (Chlorobenzene), 9, MA3077, PGIII, RC(D001, R002) (Yellow)			0.02	110LG	F 0 0 2
X Hazardous Waste Solid, n.o.s. 9, MA3077, PGIII, RC(D001) (Hh) white			0.0174	55G	3 0 2 1
J. Additional Descriptions for Materials Listed Above vac (a) RD 6125-11 vac (b) RD 6126-11 ERG 31			K. Handling Codes for Wastes Listed Above S101		
15. Special Handling Instructions and Additional Information Emergency 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 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 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.					
Printed/Typed Name ARTURO CELERI		Signature <i>Arturo Celeri</i>		Month Day Year 10/31/95	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name HERBERT W. DODGE		Signature <i>Herbert W Dodge</i>		Month Day Year 10/31/95	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name SHAKER ALTAHIM		Signature <i>Shaker Altahim</i>		Month Day Year 10/31/95	

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.  
 3 - TSD MAIL TO GENERATOR

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

NJ 2028013



State of New Jersey  
Department of Environmental Protection and Energy  
Hazardous Waste Regulation Program  
Manifest Section  
CN 028, Trenton, NJ 08625-0028

866300167

Use type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-74

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ1010181661717	Manifest Document No. 21434	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDERS 29-75 RIVERSIDE AVENUE BUILDING 17 NEWARK, NJ 07102			A. State Manifest Document Number NJ 1787118	B. State Generator's ID No.	
4. Generator's Phone (908) 485-1717			C. State Trans. ID 0265100401		D. Transporter's Phone (908) 462-1001
5. Transporter 1 Company Name WREPHOLD CARTAGE INC			E. State Trans. ID		F. Transporter's Phone
7. Transporter 2 Company Name			G. State Facility's ID		H. Facility's Phone
9. Designated Facility Name and Site Address SYSTECH ENVIRONMENTAL 11397 COUNTY ROAD 176 PAULDING, OH 45079			10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. RQ WASTE FLAMMABLE LIQUIDS, N.O.S. X (HEPTENE, XYLENE), J, UN1993, PG II			15. No.	16. Type	17. Waste No.
b. 4% Heptane					
c. 12% Xylene					
d. 16% Heptane					
e. 18% Heptane					
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
PROVIDE VMI 8590 HRC 27					
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT: CHEMTREC 1-800-424-9300 CALLER MUST IDENTIFY VAN WATERS & ROGERS AS SHIPPER. PLATE - T312-MT WJ.					
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 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 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.					
Printed/Typed Name ARTURO CELLERI		Signature <i>Arturo Celleri</i>		Month Day Year 10 8 21 95	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name BILL MICHAM		Signature <i>Bill Micham</i>		Month Day Year 10 8 21 95	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name LISA A. MANZ		Signature <i>Lisa A. Manz</i>		Month Day Year 10 7 27 95	

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172

866300168



## 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

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#### 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 supplant any legal duty you may have to provide a safe premises, workplace, product or operation.

Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 1

## INTRODUCTION

On October 3, 1995 an Occupational Health Survey was conducted at the given location to evaluate employee exposure to various airborne contaminants. 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 revealed that on the day of the survey, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminants.

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.

866300170

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### PLEASE READ CAREFULLY

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Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 2

## 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 ( $\text{mg}/\text{M}^3$ ) 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-nitroaniline (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.

866300171

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#### PLEASE READ CAREFULLY

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Chemical Compounds, Inc.  
 Newark, 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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Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 7

## APPENDIX II

866300173

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**PLEASE READ CAREFULLY**

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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:

1. 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.
2. 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.

Substance	Units	OSHA Permissible Exposure Level (PEL) <sup>1</sup>			ACGIH Threshold Limit Value (TLV) <sup>2</sup>		
		8-Hr. <sup>3</sup>	STEL <sup>4</sup>	Ceiling <sup>5</sup>	8-Hr. <sup>3</sup>	STEL <sup>4</sup>	Ceiling <sup>5</sup>
ethylene oxide <sup>6</sup>	ppm	1	-	-	1A2	-	-
methanol (skin)	ppm	200	-	-	200	250	-
nitric acid	ppm	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 Health 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).  
Action level 0.5 ppm.

- \*\*\*\*\* A1 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.

866300174

**PLEASE READ CAREFULLY**

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Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 9

## APPENDIX III

866300175

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**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 supplant any legal duty you may have to provide a safe premises, workplace, product or operation.

Chemical Compounds, Inc.  
Newark, NJ  
November 9, 1995  
Page 10

**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.

866300176

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NOV 23 1981

DONALD LAN  
SECRETARY OF STATE

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 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.

FIRST: The name of the corporation is:  
CHEMICAL COMPOUNDS, INC.

SECOND: The location of the principal office in this State is at 1135 Clifton Avenue, Clifton, New Jersey 07011.

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 Jersey Statutes Annotated, Title 14A, entitled "Corporations, General"

FIFTH: The name and post office addresses of

the incorporators and the number of shares 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:

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

SIXTH: The period of existence of this corporation 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.

EIGHTH: The number of Directors constituting the first Board of Directors shall be two and shall be:

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. Garrison*  
\_\_\_\_\_  
GEORGE L. GARRISON L.S.

WITNESS:

*Javier Buncella*  
\_\_\_\_\_

866300179







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

SEP 15 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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TIERRA-B-004780

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.

851640002

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 18<sup>th</sup> 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

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**PRPs in Receipt of Notice Letters:**

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