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Attorneys for Third-Party Defendant
W.C. Industries

Superior Court of New Jersey
Law Division: Essex County
Docket No. L-9868-05 (PASR)

NEW JERSEY DEPARTMENT OF)
ENVIRONMENTAL PROTECTION, THE)
COMMISSIONER OF THE NEW JERSEY)
ENVIRONMENTAL PROTECTION)
AGENCY, and THE ADMINISTRATOR)
OF THE NEW JERSEY SPILL)
COMPENSATION FUND,)

Plaintiffs,)

vs.)

OCCIDENTAL CHEMICAL)
CORPORATION, TIERRA SOLUTIONS,)
INC., MAXUS ENERGY CORPORATION,)
REPSOL YPF, S.A., YPF, S.A., YPF)
HOLDINGS, INC. and CLH HOLDINGS,)

Defendants)

MAXUS ENERGY CORPORATION and)
TIERRA SOLUTIONS, INC.,)

Third-Party Plaintiffs,)

vs.)

3M COMPANY)
A.C.C., INC.)
ACH FOOD COMPANIES, INC.,)
ACTIVE OIL SERVICE,)
ADCO CHEMICAL COMPANY,)

CIVIL ACTION

**INITIAL DISCLOSURE
STATEMENT OF W.C.
INDUSTRIES**

AGC CHEMICALS AMERICAS, INC.,)
ALDEN-LEEDS, INC.,)
ALLIANCE CHEMICAL, INC.,)
ALUMAX MILL PRODUCTS, INC.,)
AMCOL REALTY CO.,)
AMERICAN INKS AND COATINGS)
CORPORATION,)
APEXICAL, INC.,)
APOLAN INTERNATIONAL, INC.,)

ARKEMA, INC.,
ASHLAND INC.,
ASHLAND INTERNATIONAL HOLDINGS, INC.,
ASSOCIATED AUTO BODY & TRUCKS, INC.,
ATLAS REFINERY, INC.,
AUTOMATIC ELECTRO-PLATING CORP.,
AKZO NOBEL COATINGS, INC.,
BASF CATALYSTS LLC,
BASF CONSTRUCTION CHEMICALS INC.,
BASF CORPORATION,
BAYER CORPORATION,
BEAZER EAST, INC.,
BELLEVILLE INDUSTRIAL CENTER,
BENJAMIN MOORE & COMPANY,
BEROL CORPORATION,
B-LINE TRUCKING, INC.,
BORDEN & REMINGTON CORP.,
C.S. OSBORNE & CO.,
CAMPBELL FOUNDRY COMPANY,
CASCHEM, INC.,
CBS CORPORATION,
CELANESE LTD.,
CHEMICAL COMPOUNDS INC.,
CHEMTURA CORPORATION,
CLEAN EARTH OF NORTH JERSEY, INC.,
COSMOPOLITAN GRAPHICS CORPORATION,
CIBA CORPORATION,
COLTEC INDUSTRIES INC.,
COLUMBIA TERMINALS, INC.,
COMO TEXTILE PRINTS, INC.,
CONAGRA PANAMA, INC.;
CONOPCO, INC.,
CONSOLIDATED RAIL CORPORATION,
COOK & DUNN PAINT CORPORATION,
COSAN CHEMICAL CORPORATION,
COVANTA ESSEX COMPANY,
CRODA, INC.,
CRUCIBLE MATERIALS CORPORATION,
CURTISS-WRIGHT CORPORATION,
CWC INDUSTRIES, INC.,
DARLING INTERNATIONAL, INC.,
DAVANNE REALTY CO.,
DELEET MERCHANDISING CORPORATION,
DELVAL INK AND COLOR, INCORPORATED,
DILorenzo PROPERTIES COMPANY, L.P.,
E.I. DU PONT DE NEMOURS AND COMPANY,
EASTMAN KODAK COMPANY,

EDEN WOOD CORPORATION,
ELAN CHEMICAL COMPANY, INC.,
EM SERGEANT PULP & CHEMICAL CO.,
EMERALD HILTON DAVIS, LLC,
ESSEX CHEMICAL CORPORATION,
EXXON MOBIL
F.E.R. PLATING, INC.,
FINE ORGANICS CORPORATION,
FISKE BROTHERS REFINING COMPANY,
FLEXON INDUSTRIES CORPORATION,
FLINT GROUP INCORPORATED,
FORT JAMES CORPORATION,
FOUNDRY STREET CORPORATION,
FRANKLIN-BURLINGTON PLASTICS, INC.,
GARFIELD MOLDING COMPANY, INC.,
GENERAL CABLE INDUSTRIES, INC.;
GENERAL DYNAMICS CORPORATION,
GENERAL ELECTRIC COMPANY,
GENTEK HOLDING LLC,
GIVAUDAN FRAGRANCES CORPORATION,
G. J. CHEMICAL CO.,
GOODY PRODUCTS, INC.,
GORDON TERMINAL SERVICE CO. OF N.J., INC.,
HARRISON SUPPLY COMPANY,
HARTZ MOUNTAIN CORPORATION,
HAVENICK ASSOCIATES L.P.,
HEXCEL CORPORATION,
HEXION SPECIALTY CHEMICALS, INC.,
HOFFMANN-LA ROCHE INC.,
HONEYWELL INTERNATIONAL INC.,
HOUGHTON INTERNATIONAL INC.,
HUDSON TOOL & DIE COMPANY, INC,
HY-GRADE ELECTROPLATING CO.,
ICI AMERICAS INC.,
INNOSPEC ACTIVE CHEMICALS LLC,
INX INTERNATIONAL INK CO.,
ISP CHEMICALS INC.,
ITT CORPORATION,
KEARNY SMELTING & REFINING CORP.,
KAO BRANDS COMPANY,
KOEHLER-BRIGITT STAR, INC.,
LINDE, INC.,
LUCENT TECIINOLOGIES, INC.,
MACE ADHESIVES & COATINGS COMPANY, INC.,
MALLINCKRODT INC.,
MERCK & CO., INC.,
METAL MANAGEMENT NORTHEAST, INC.,

MI HOLDINGS, INC.,
MILLER ENVIRONMENTAL GROUP, INC.,
MORTON INTERNATIONAL, INC.,
N L INDUSTRIES, INC.,
NAPPWOOD LAND CORPORATION,
NATIONAL FUEL OIL, INC.,
NATIONAL-STANDARD, LLC,
NELL-JOY INDUSTRIES, INC.,
NESTLE U.S.A., INC.,
NEW JERSEY TRANSIT CORPORATION,
NEWS AMERICA, INC.,
NEWS PUBLISHING AUSTRALIA LIMITED,
NORPAK CORPORATION,
NOVELIS CORPORATION,
ORANGE AND ROCKLAND UTILITIES, INC.,
OTIS ELEVATOR COMPANY,
PRC-DESOTO INTERNATIONAL, INC.,
PASSAIC PIONEERS PROPERTIES COMPANY,
PFIZER INC.,
PHARMACIA CORPORATION,
PHELPS DODGE INDUSTRIES, INC.,
PHILBRO, INC.,
PITT-CONSOL CHEMICAL COMPANY,
PIVOTAL UTILITY HOLDINGS, INC.,
PPG INDUSTRIES, INC.,
PRC-DESOTO INTERNATIONAL, INC.,
PRAXAIR, INC.,
PRECISION MANUFACTURING GROUP, LLC,
PRENTISS INCORPORATED,
PROCTER & GAMBLE MANUFACTURING COMPANY,
PRYSMIAN COMMUNICATIONS CABLES AND
SYSTEMS USA LLC,
PSEG FOSSIL LLC,
PUBLIC SERVICE ELECTRIC AND GAS COMPANY,
PURDUE PHARMA TECHNOLOGIES, INC.,
QUALA SYSTEMS, INC.,
QUALITY CARRIERS, INC.,
RECKITT BENCKISER, INC.,
REICHHOLD, INC.,
REVERE SMELTING & REFINING CORPORATION,
REXAM BEVERAGE CAN COMPANY,
ROMAN ASPHALT CORPORATION,
ROYCE ASSOCIATES, A LIMITED PARTNERSHIP,
R.T. VANDERBILT COMPANY, INC.,
RUTHERFORD CHEMICALS LLC,
S&A REALTY ASSOCIATES, INC.,
SCHERING CORPORATION,

SEQUA CORPORATION,)
SETON COMPANY,)
DSIEMENS WATER TECHNOLOGIES)
CORP.)
SINGER SEWING COMPANY)
SPECTRASERV, INC.,)
STWB, INC.,)
SUN CHEMICAL CORPORATION,)
SVP WORLDWIDE, LLC,)
TATE & LYLE INGREDIENTS)
AMERICAS, INC.,)
TEVA PHARMACEUTICALS USA, INC.,)
TEVAL CORP.,)
TEXTRON INC.,)
THE DIAL CORPORATION,)
THE DUNDEE WATER POWER AND)
LAND COMPANY,)
THE NEWARK GROUP, INC.,)
THE OKONITE COMPANY, INC.,)
THE SHERWIN-WILLIAMS COMPANY,)
THE STANLEY WORKS,)
THE VALSPAR CORPORATION,)
THIRTY-THREE QUEEN REALTY INC.,)
THREE COUNTY VOLKSWAGEN)
CORPORATION,)
TIDEWATER BALING CORP.,)
TIFFANY & CO.,)
TIMCO, INC.,)
TRIMAX BUILDING PRODUCTS, INC.,)
TROY CHEMICAL CORPORATION, INC.,)
UNIVERSAL OIL PRODUCTS COMPANY,))
V. OTTILIO & SONS, INC.,)
VELSICOL CHEMICAL CORPORATION,))
VEOLIA ES TECHNICAL SOLUTIONS,)
L.L.C.,)
VERTELLUS SPECIALTIES INC.,)
VITUSA CORP.,)
VULCAN MATERIALS COMPANY,)
W.A.S. TERMINALS CORPORATION,)
W.A.S. TERMINALS, INC.,)
W.C. INDUSTRIES,)
WHITTAKER CORPORATION,)
WIGGINS PLASTICS, INC.,)
ZENECA INC.,)
Third-Party Defendants.)
_____)

In accordance with Case Management Order VIII, W.C. Industries hereby provides its Initial Disclosure Statement.

a. The name, address and telephone number, as may be known of each individual likely to have discoverable information, along with the subjects of that information, that relates to any alleged discharge or release of pollutants, contaminants and/or hazardous substance ("Pollutants") into Newark Bay Complex (as these terms are defined in the Second Amended Complaint and the Third-Party Complaints) from the site(s) and/or properties with which the disclosing party is associated in the Third-Party Complaint ("Alleged Discharges").

RESPONSE: No one is known to this third party Defendant who has any such information.

b. The name, address and telephone number, as may be known, of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses (unless the use would be solely for impeachment).

RESPONSE: Samuel Cohen
25 Sutton Place South
New York, NY 10022
212-753-9071

c. The name, address and telephone number, as may be known, of any and all past or present owners, lessees or operators at the site(s) and/or properties with which it is associated in the Third-Party Complaint and the dates of such ownership, lease or operation, as may be known.

RESPONSE: The name "Woburn Chemicals" was purchased by W.C. Industries from an entity owned by Karl H. Reimold.

d. With respect to any individual identified pursuant to paragraph (a), (b) or (c) above, (or any other individual known to have material knowledge of an alleged discharge or release of a Pollutant at or from a site and/or property, or into the Newark Bay Complex), any known inability to testify due to age, infirmity, or incompetency within 12 months following the date of the Initial Disclosure.

RESPONSE: Karl H. Reimold is likely to be deceased.

e. A description by category and location (or copy at the discretion of the Third-Party Defendant) of all documents or electronically stored information that the disclosing party has in its possession, custody, or control with respect to Alleged Discharged including disclosure of the extent to which such documents or electronically stored information may fall within the Excepted Information.

RESPONSE: W.C. Industries has no documents relating to claims made in this case.

Third-Party Defendant reserves the right to supplement this Initial Disclosure Statement as additional information is obtained through investigation and discovery.

Gelman Gelman Wiskow & McCarthy LLC
Attorneys for Third-Party Defendant

By: 

Barry A. Cohen

Dated: April 21, 2010

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Third-Party Defendants)

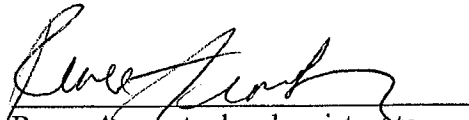
CIVIL ACTION

Certification of Service

Renee Aronesty, of full age, hereby certifies as follows:

1. On this date, I caused one copy of W.C. Industries' Third-Party Initial Disclosure and its Response to the ESI Initial Questionnaire in the above-captioned matter by either email or regular mail for those party representatives who have not provided an email address.

Dated: April 21, 2010


Renee Aronesty, legal assistant to
Barry A. Cohen, Esq.