Hoechst Celanese

Chemical Group
Hoechst Celanese Corporation
Newark Terminal
354 Doremus Avenue
Newark, NJ 07105-4872
201 589 2705

January 11, 1994

NJDEPE
Bureau of Emergency Response
2 Babcock Place
West Orange, New Jersey 07052

BBA000010

Attention: Joseph E. Hoyle
Jerry Stanton

Dear Sirs:

This letter is in reference to the Acetic acid leak that took place on January 6, 1994 at the Hoechst Celanese Chemical Group, Inc., Newark Terminal located on 354 Doremus Avenue, Newark, New Jersey 07105.

As you requested during your site visit on January 6, 1994, attached is the following for your review:

* Chronology - Acetic Acid Incident
* Calculation - approximation of Acetic acid lost from leaking flange
* OHM Remediation Services Corporation (OHM) Project # 15642 Job Summary
* OHM map of sample location

Please contact me at (201)589-2705 if you have any questions.

Very truly yours,

Anne Coogan-Acevedo
Environmental, Health and Safety Representative

cc: NJ State Police Marine Bureau
Bldg. 400
Corbin Street
Port Newark, NJ 07114

Hoechst

Chronology - Acetic Acid Incident 1/6/94

0800 hours: Two Operators were working on freeing up frozen water line. Operators had to walk through area where leak subsequently occurred to access frozen water line. No leak was observed at this time, therefore the leak occurred sometime after 0800 hours.

0810 hours: A loader began loading an acetic acid blend at the east farm truck rack.

0812 hours: The same two operators working on a water line on tank 26 detected an odor of acetic acid. They inspected the area and found acetic acid coming from the flange on a valve attached to the acetic acid pier line. The line was in the pipe rack from the pier area opposite tank 18 and about 40 feet from where the operators were working. One of the operators announced the discovery of the acetic acid over the terminal radio system.

0814 hours: The main valve at the acetic acid tank was closed and the pump shut off.

0815 hours: The terminal emergency response team responded to the spill site and began using absorbent pillows and other spill control devices to contain the acetic acid and block its flow toward the Passaic River.

0825 hours: The New Jersey Department of Environmental Protection an Energy(NJDEPE) was called on the emergency hotline number. The DEP was given the details of the incident.
Case #94-1-6-0828-59, Operator #9

0835 hours: The U.S. Coast Guard Office in New York was notified of the incident.
Contact: Petty Officer Carey

0840 hours: The National Response Center was notified of the incident as a precautionary measure even though the RQ of 5000 pounds was not exceeded.
Contact: Petty Officer Mauldin
Case # 215446

0850 hours: Terminals Manager Chemical Group J.T. McMahon was notified.

0900 hours: A follow up call to the NJDEPE was made to inform them that the Acetic acid was being contained and that contractor personnel would clean up the residue.

0905 hours: OH Materials, Nick Dorovich the emergency clean up contractor was notified. He expected to have personnel at the terminal by 1100 hours.

0910 hours: Wendell Brough, Dallas ESHA was notified of the incident.

0915 hours: The Coast Guard called back and asked for a copy of the MSDS for acetic acid. One was faxed to attention Petty Officer Carey.

0930 hours: A calculation of the volume of material involved from dimensions of the liquid steam under the pipe rack gave us an estimate of 187 gallons of which approximately 50 percent was assumed to be water. Total acid involved then amounted to about 94 gallons.

1000 hours: NJ State Marine Police arrive on site - Officers John Salvato #9755 and Joseph DeMarino #9747.

1010 hours: NJDEPE Bureau of Emergency Response Joseph E. Hoyle and Jerry Stanton arrive on site.

1100 hours: Coast Guard arrived on site Pollution Investigator Scott Allen Carey.

starting 1100 hours: OH Materials personnel arrived and began clean up. pH samples were collected as requested by NJDEPE and Coast Guard.
and sampling.

1/7/94 Attempted to contact NJ State Marine to inform them of sampling results. Officers on patrol. Left message for them to return call.

ACETIC ACID CALCULATION

200' LONG

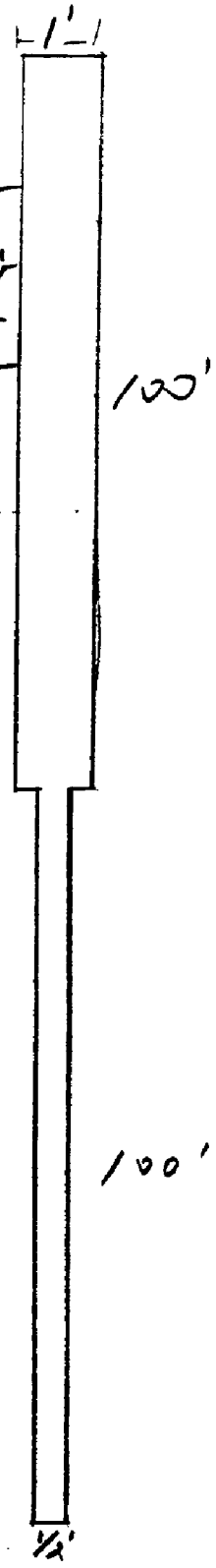
100' x 1' WIDE x 2" DEEP = 16.7 CU FT

100' x 1/2' WIDE x 2" DEEP = 8.3 CU FT

25 CU FT

2" DEEP (.167')

187 GALLONS



Spill File Prosecution

Edward J. Faille

Manthanol Alcohol Spill, Celanese Chemical Co. August 10, 1976
354 Doremus Avenue, Newark, New Jersey 07105
76-5-12-3

On May 12, 1976 Lt. McCurey U.S. Coast Guard called the hot line to inform us of a 60 - 70,000 gallon methanol alcohol spill at Celanese Chemical Company, 354 Doremus Avenue, Newark, New Jersey. The U.S. Coast Guard investigated this spill.

On May 13, 1976 John Vernam told me to check it on May 14, 1976.

On May 14, 1976 I arrived at Celanese Chemical Company. I met with Edgar F. Gold, Terminal Superintendent and he told me that a gasket in the manhead wasn't tightened correctly and 50,000 gallons of methanol alcohol ran out onto the ground and into a tributary of the Passaic River. This was noticed by a man working at the loading rack and he notified the shift supervisor. The shift supervisor turned a water spray on the manhead and had some maintenance men tighten the nuts and bolts under a water spray to stop anymore product from being lost. They recovered 20 - 25,000 gallons into a tank to be reclaimed. The other 25 - 30,000 gallon flowed into a ditch behind the Celanese tank farm and into the Passaic River. During my inspection I took samples of the stream and a sample of the product in the tank. Mr. Gold told me that the tank holds 800,000 gallon of product and they were going to set up a program to make sure that this doesn't happen again.

All:G6

76-5-11-3
DEP Case Number

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
OFFICE OF SPECIAL SERVICES
OIL AND HAZARDOUS MATERIALS SPILL REPORT

Initial Report ______ Initially | Investigation

Date of spill: 5-12-76	Time of spill: 1730 hrs.	5:30
Municipality: Newark N.J.	Type of material: methanol alcohol	
Receiving waters: Passaic R.	Quantity: 60,000 - 70,000 gallons	
Tributary to:	Source: Celanese Chemical Co.	
Reported by: Lt. McCurey	Location of spill: Celanese Chemical Co.	
Telephone: 212-264-8770	(street, road, etc.) 354 Doremus Ave. Newark	
Address: U.S.C.G.	Cause: tank overfill	
Affiliation: Governors Island	Date of report: 5-12-76	
	Time of report: 11:10 P.M.	

Report Summary:

Mr. Rolland, shift supervisor for Celanese called in this problem to the U.S.C.G. The alcohol that overflowed onto the ground was flushed into a tributary of the Passaic River by the Celanese fire department. U.S.C.G. investigating.

Report taken by: John Verman

Hot Line X

Investigation (on scene) (telephone)
Name of investigator:
Date of investigation:
Station:
Time:

Persons contacted:

Name	Affiliation	Telephone
1 John Forsterman	Celanese Co.	
2 Ed Field		
3 Boyd Braffett		

Samples: Yes___ No X Photos: Yes___ No X

Report of investigation and recommended containment and cleanup:

none

no personnel available to investigate. 5-12-76

Cleanup accomplished: Cost of cleanup:

5-13-76,
9/74 Assigned Ed Faille to investigate.

TIERRA-B-015568

CELANESE
CHEMICAL COMPANY

RECEIVED
AUG 13 11 0 ... 76

RECEIVED
JUN 1 1 1976
U.S.C.G. GROUP NEW YORK
GOVERNORS ISLAND N.Y.

NEWARK TERMINAL

May 27, 1976

DEPT. ...

Captain of the Port
United States Coast Guard
Governors Island
New York, New York

RE: Supplement to Letter from Mr. R.E. Larsen,
Dated May 17, 1976

Dear Sir:

Pursuant to a conversation between myself and VC 3 Lane on May 26, this letter is forwarded with further information concerning the methanol spill at this facility on May 12, 1976.

Laboratory analysis showed that traces of methanol were still evident in the drainage creek on the morning of May 13. Steps were taken to pump the water from the creek during the afternoon of May 13. Lack of an adequate storage site for the water dictated that the creek water be diluted to the point where the methanol did not present any hazard and then put into the sanitary sewer facilities. Sewerage flows to the Passaic Valley Sewerage Plant and it was subsequently learned from them that they do not have facilities for treating methanol. Therefore, as stated in the original letter, the 50M gallons that flowed to the drainage creek did subsequently flow to the Passaic River.

Should you need further explanation, please contact me at (201) 589-2705.

Very truly yours,

CELANESE CHEMICAL COMPANY

John J. Forstchen
Terminals Engineer

JJF:vgs

cc: E. F. Gold - Newark
W. D. Coble - Newark
D. A. Jenkins - New York
R. H. Maurer - CCTC
R. E. Larsen - Houston

Janice Katona, Division of Fish, Game and Shellfisheries

Karl Birns

Celanese Chemical Co.

O.H.M.P. # 76-5-12-3

On May 14, 1976 an investigation by this Department revealed that violations of NJSA 58:10-23.6 and 58:10-23.1 were committed by the subject company when a harmful quantity of methanol alcohol was discharged in such a manner as to allow flow or runoff into a tributary of the Passaic River. The State offered to settle this case for $2750.

Supporting correspondence is attached.

Karl F. Birns, Chief
Office of Special Services
Division of Water Resources

5758:T.A.:M

Enclosures

cc: Division of Fish, Game and Shellfisheries
Public Information Office

I hereby accept the attached check for $2750.

Janice Katona
Janice Katona

9/10/76
DATE

Corporation System
Corporation Trust Company
C T Low Technology, Inc.

LJ

JERSEY CITY, NEW JERSEY
(City) (State)

AUGUST 20, 1976
(Date)

TO: Manual Schultz, Gen Atty & Asst Secy
Celanese Corporation
1211 Avenue of the Americas
New York, N Y 10036

(XX) VIA CERTIFIED MAIL
( ) VIA CERTIFIED AIR MAIL
( ) VIA MESSENGER

RECEIVED

RE: PROCESS ~~SERVED~~ IN NEW JERSEY
(Jurisdiction)

FOR CELANESE CORPORATION DELAWARE
(Name of Company) (Domestic State)

Enclosed are copies of legal process served upon the statutory agent of the above company as follows:

1. Title of Action: STATE OF NEW JERSEY, DEPARTMENT OF ENVIRONMENTAL PROTECTION
TO: CELANESE CORPORATION

2. Document(s) ~~Served~~: RECEIVED: NOTICE OF VIOLATION AND OFFER OF SETTLEMENT

3. Court: -----

4. Nature of Action: Investigation by the Dept on 5/14/76 of Celanese Chemical Company in Newark, N.J. discloses violations of certain New Jersey Statutes.

5. On Whom Process was ~~Served~~: RECEIVED by certified mail:
THE CORPORATION TRUST COMPANY
Jersey City, N J

6. Date and Hour of Service: August 20, 1976

7. Appearance or Answer Due: Settlement may be made in amount of $2,750.00 within 15 days

8. Plaintiff's ~~Attorney~~: BY: Richard E. Bellis, Assistant Director
Monitoring, Surveillance and Enforcement Element
Division of Water Resources
P.O. Box 2809
Trenton, N J 08625

9. Remarks:

KINDLY ACKNOWLEDGE RECEIPT BY SIGNING
THE CARBON COPY AND RETURNING IT TO -----

Signed C T CORPORATION SYSTEM

Per Maryella Rivera
Maryella Rivera

Address 15 Exchange Place

Jersey City, N J 07302

NJ290-Y 2-75 (75M SETS)

CERTIFIED MAIL #191-375
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION
AND OFFER OF SETTLEMENT

O.H.M.P. Case 76-5-12-3

Corporation Trust Company
Registered Agent for
Celanese Corporation
15 Exchange Place
Jersey City, New Jersey

Gentlemen:

An investigation by this Department on May 14, 1976 of Celanese Chemical Company in Newark, New Jersey, disclosed that methanol alcohol was discharged in such a manner as to allow flow or runoff into the Passaic River via a drainage ditch.

The activity summarized above violates the following New Jersey Statutes:

N.J.S.A. 58:10-1 et seq.	Pollution of Potable Waters
*N.J.S.A. 58:10-23.6	Failure to Immediately Notify
*N.J.S.A. 58:10-23.1 et seq. and N.J.S.A. 23:5-28	Draining Deleterious Substances In Waters of the State

* asterisk designates applicable statute

The above cited statutory violations could result in civil penalty liability: $1,000 per day for violation of N.J.S.A. 58:10-1 ($3,000 per day for your subsequent violation of N.J.S.A. 58:10-1); $3,000 per day for failure to immediately notify the Department of the spill incident pursuant to N.J.S.A. 58:10-23.6; $6,000 per day for violating N.J.S.A. 23:5-28.

The Department is amenable to compromise and settle these violations for $2,750.00. Should you decide to settle this matter, payment must be made within fifteen (15) days of receipt of this letter. Payment must be forwarded to: Chief of Office of Special Services, Department of Environmental Protection, Division of Water Resources, P.O. Box 2809, Trenton, New Jersey 08625. Only checks or money orders drawn to the order of "New Jersey Department of Environmental Protection" will be accepted. Your cancelled check or money order receipt will serve as your receipt.

Should you decide not to accept our settlement offer or fail to forward payment within 15 days of receipt of this letter, this offer is rescinded, and this matter will be forwarded to the Office of the Attorney General with instruction to institute a legal action.

Acceptance of this settlement offer will not relieve you of the responsibility to properly remove the discharged material or relieve you of legal responsibility for future illegal discharges. Settlement will not terminate your obligation to reimburse persons, authorized by the Department pursuant to N.J.S.A. 58:10-23.5 and 23.7 to contain, remove, or mitigate the damage that resulted from the pollution incident.

If you wish to make any inquiries or discuss this settlement offer, contact Karl Birns, Chief, Office of Special Services, (609) 292-5560.

Very truly yours,

Richard E. Bellis, Assistant Director
Monitoring, Surveillance and Enforcement Element
Division of Water Resources

054548:A34:X

AUG 17 1976

Spill File Prosecution

Edward Faille

Methanol Alcohol Spill, Celanese Chemical Co. August 6, 1976
354 Doremus Avenue, Newark, N.J. 07105

76-5-12-3

On May 12, 1976 Celanese Chemical Company, 354 Doremus Avenue, Newark, N.J. 07105 had an estimated 30,000 gallon Methanol Alcohol spill into a drain ditch and into the Passaic River. Therefore I am recommending a Notice of Violation be issued to:

Corporation Trust Company
Registered Agent for
Celanese Corporation
15 Exchange Place
Jersey City, New Jersey

for the sum of $2,750.00 under N.J.S.A. 58:10-23.1 et seq. and N.J.S.A. 23:5-28 et seq., for discharging hazardous materials into the waters of the State.

The penalty of $2,750.00 was arrived at by using our revised penalty schedule guideline in the following manner.

A.	58:10-23.6 Non notification Medium spill hazardous material handler	$ 500.00
B.	23:5-28 58:10-23.1 Medium spill hazardous material handler	$5,000.00
		$5,500.00
C.	Excellent cooperation on clean up multiply by	0.50
	Total penalty	$2,750.00

All:G6

STREAM CONTAMINATION REPORT

ELIMINATED

District No.: 10 Report Date: 6/8/79 Inspector: Fiore/Cordasco

Company Name: CELANESE CHEMICAL CO., INC.

Address: 304 Doremus Avenue, Newark

Name and Title of Person Contacted: Nicholas V. Bisonni, Terminal Engr.

Telephone No: 589-2705

Nature of Business: _____

Sampled - yes [X] no [ ] Date: 6/7/79 Time: 10:40 Temp.: 65

Polluting - yes [X] no [ ] Nature of Pollution: ph 12

Discharge to Storm Sewer - yes [ ] no [ ] NDPES Permit - yes [ ] no [ ]

Violation: Date: 6/7/79 Time: 10:00 Description:

Construction ditch was open up to Plum Creek - storm water pick up something alkaline

Weather: Clear Air Temp.: 75

Color: whitish Odor: none pH: 12 Test Paper

Turbidity: cloudy

Collection on Bank - Describe: none

Surface Scum, Foam or Oil: none

Distance Visible Downstream: Approximately 500' Ft.

Width across stream: Approximately 6' Ft.

REMARKS: The Terminal Enginger had construction drain ditch closed off to Plum Creek. This water will be pumped into sanitary sewer, with permission

At 10:15 a.m. Inspector Cordasco and I were radioed to answer citizen complaint about black material in Plum Creek, Newark. We arrived at 10:35 a.m. to investigate black color in Plum Creek at Celanese Chemical Co. and we found that someone opened construction drain ditch into Plum Creek.

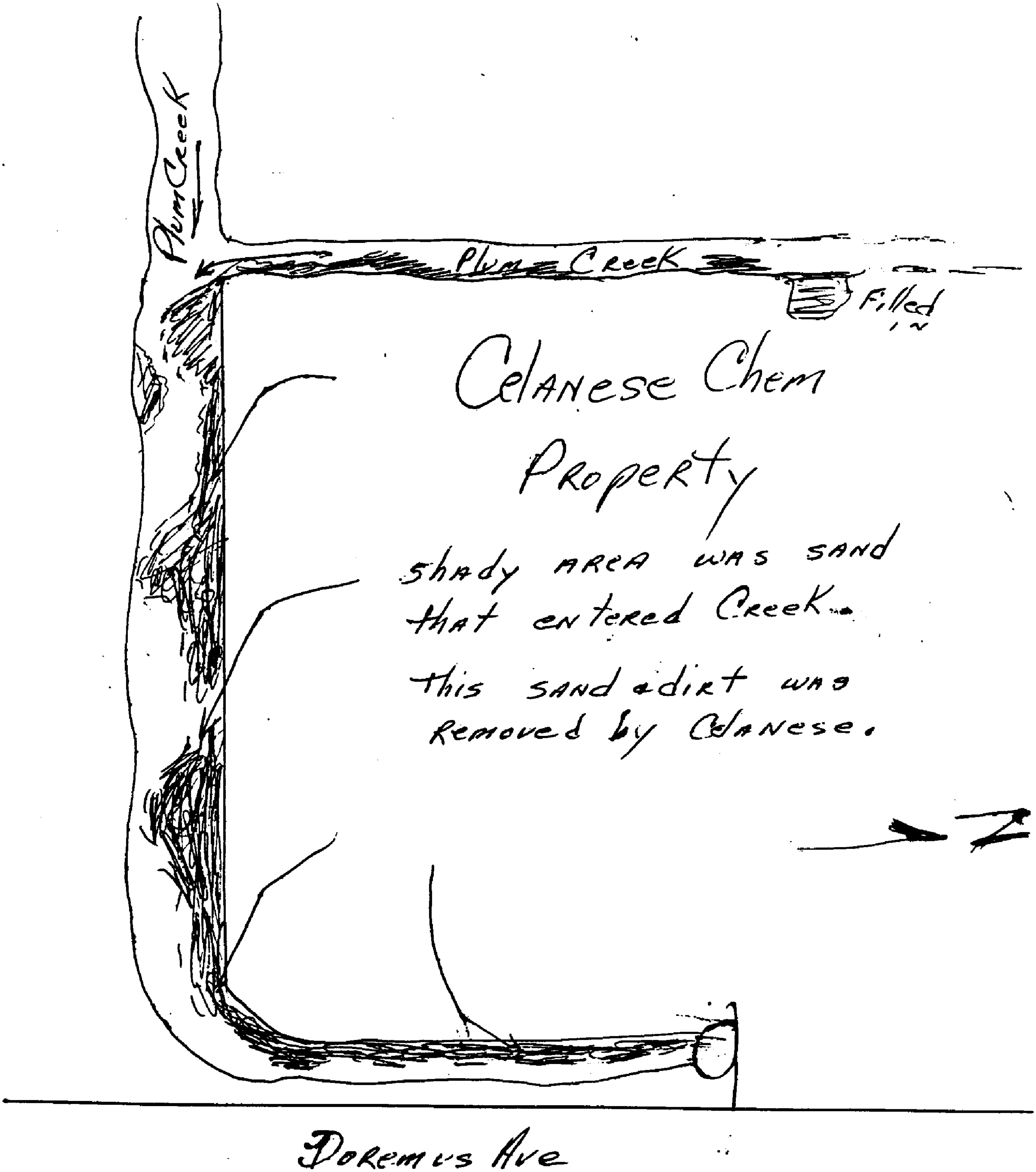
We took a sample and the ph was 12. We called for the Terminal Engineer Mr. Pisonni and he assured us that it was opened without his knowledge. He instructed the backhoe to fill in with dirt to stop flow from entering Plum Creek. He will meet with Frank D'Ascensio about pumping into sanitary sewer.

This pollution was eliminated. Report of black material is under investigation by State D.E.P.

Respectfully submitted,

Bill Fiore
River Inspector

Matthew Cordasco
River Inspector



River Inspector
Bill [illegible]

XXXXXXXXXXXXXXXXXXXX WATER RESOURCES

February 1, 1971

Mr. John Maher, Jr.
Assistant General Counsel
Celanese Chemical Company
245 Park Avenue
New York, New York 10017

Dear Mr. Maher:

Re: Water Pollution Abatement Order
Dated August 13, 1969
Celanese Chemical Company
City of Newark

Recent inspections by a representative of this office have determined that flow into the receiving ditch in question has ceased. Corrective measures undertaken by Celanese Chemical Company appear at this time to be sufficient to abate the conditions underwhich the August 13, 1969 Order was based.

Very truly yours,

Douglas M. Clark
Supervising Public Health Engineer

[illegible]

c.c.: Mr. [illegible] Cable, Jr.
Mr. Raymond Lukachis

NEW JERSE[illegible] STATE [illegible]ARTMENT OF ENVIRONMEN[illegible] PRO[illegible]TION
[illegible]FICE OF HAZARDOUS SUBSTANCES CON[illegible]OL

OIL AND HAZARDOUS MATERIALS SPILL REPORT

INITIAL REPORT

OHMP CASE NUMBER [illegible] 1-18-[illegible]

Date of spill: 1-18-80
Municipality: NEWARK
Receiving waters: PASSAIC R
Tributary to:
Reported by: E. GOLD
Telephone: 201-589-2705
Address:
Affiliation: TERMINAL SUPERINTENDENT CELANESE CHEM, INC

Time of spill: 0830
Type of material: METHYL ALCOHOL
Quantity: 500-900 g.
Source: CELANESE CHEMICAL, INC.
Location of spill: (street, road, etc.) 354 DOREMUS AVE, NEWARK
Cause: OPEN DRAIN ON PIPELINE
Date of report: 1-18-80
Time of report: 1050
Report taken by: [illegible]
Hot Line: ______

Initial Action

AGENCY	TELEPHONE No.	NOTIFIED YES	NOTIFIED NO
Coast Guard/EPA	800 424-8802	X	☐
Fish & Game	609 292-6685 201 236-2313	☐	☐
Basin Manager	609 292-0566(A) -0686(R) -0576(D) -0604(P) T. Harrington	X	☐
Shellfish Notified	609 292-0566	☐	☐

AGENCY	TELEPHONE No.	NOTIFIED YES	NOTIFIED NO
State Police CD/DC	609 882-2000	☐	☐
Solid Waste	609 292-9877	☐	☐
Air Pollution	609 292-6724	☐	☐
Pesticides Control	609 292-5890	☐	☐
Affected Water Supplies ______		☐	☐

Investigation (on scene) (telephone)
Name of investigator:
Date of investigation:
Station:
Time:

Persons contacted:

Name	Affiliation	Telephone
1		
2		
3		

Samples: Yes__ No__ Photos: Yes__ No__

Report of investigation and recommended containment and cleanup:

Memo in Spill File ☐

Celanese Chem, Inc took samples up & down stream, no analysis as yet.
SANDY HOOK USCG INVESTIGATING

OFFICE COPY

TIERRA-B-015579

FM COGARD COTP NEW YORK NY
TO ZEN/COGUARD NEW YORK NY
INFO ZEN/EPA REGION TWO EDISON NJ
COGARD NATIONAL RESPONSE CENTER WASHINGTON DC
ZEN/NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
CG ORNC
BT
UNCLAS//N16465//
TO MEP
POLREP ONE AND FINAL METHYL ALCOHOL MINOR DISCHARGE
CELANESE CHEMICAL 354 DOREMUS AVE NEWARK NEW JERSEY
PASSAIC RIVER PIN 80-1-18/4/2044
1. SITUATION
A. 181043R JAN 80 COTP RECEIVED REPRT FROM MR BOLL OF CELANESE CHEMICAL ABOUT A METHYL ALCOHOL SPILL OF APPROX 500 GALLONS
B. TIME OF OCCURRANCE 180830R JAN 80 DAY OFWEEKSHOUR OFDAY OF
C. LOCATION NEWARK L4045C742F
D. STATE NEW JERSEY NJ
E. WATERBODY PASSAIC RIVER 2CL
F. SOURCE ONSHORE PIPELINE 421
G. SOURCE ID NONE

PAGE TWO RUEDEEA7352 UNCLAS
H. CAUSED OPEN DRAIN WG
I. OPERATION UNKNOWN 99
J. MATEREAL METHYL ALCOHOL 2067
K. QUANTITY 00005P0G
L. AFFECTED RESOURCES UNKNOWN
M. NOTIFIER AA2
N. ANTICIPATED RESPONSE 1
O. OPFAC NUMBER 0536222
2. ACTION TAKEN
A. 181130R JAN 80 INVESTIGATORS ALLEN EAVES RAGONESE ARRIVED ON SCENE
B. 1135 MET WITH MR BORG ASST TERMINAL SUPPERVISER HE STATED THAT APPROX 500 GALLONS OF METHYL ALCOHOL CAME OUT OF AN OPEN PIPE ON TO THE FACILITY GROUNDS INTO A CATCH BASIN AND OUT A SEWER OUTFALL INTO THE WATER
C. INVESTIGATORS OBSERVED NO METHYL ALCOHOL OR FOREIGN MATERIAL IN WATER
D. INVESTIGATORS D/S
3. CASE CLOSED NO VIOLATION REPORT TO FOLLOW
4. NO VIOLATION OF FWPCA OR REFUSE ACT
BT
#7352

NNNN

80-1-18-2

EPA NJS DEP MAIL/DNP 182317R

CO/XO	✓	SNO	
OPS		PERS	
PSO	✓	A/N	
WPO		STA	
ENG		SUPP	

CELANESE
CHEMICAL COMPANY

NEWARK TERMINAL

January 21, 1980

N. J. Environmental Protection Agency
Office of Hazardous Substance Control
120 Route 156
Yardville, New Jersey 08620

Attention: Mr. Dennis Flaherty

Dear Mr. Flaherty:

Confirming our phone report of January 18, 1980 regarding a direct spill into the Passaic River of approximately 500 to 900 gallons of methyl alcohol;

1. Time of spillage 0800 - 0830
2. Product, methyl alcohol, is colorless and 100% miscible in water.
3. Shift supervisor was transferring product from shore tank to shore tank via hose connection between tank lines at pier in order to purge new pipeline.
4. Although he walked the new line to check for leaks he failed to notice a 3/4" low point drain valve under the pier piping; this had been opened by mechanical contractors to drain after hydrostatic testing of the new line and had not been closed.
5. Another employee, approaching the pier, had a "low angle" view and noticed the discharge; not being familiar with the system he contacted the yard operator who immediately climbed down and closed the valve.
6. Both the USCG Pollution Response office and N.J. EPA Div. of Water Resources were contacted in addition to our call to you.
7. The supervisor and mechanical contractors involved have been severely reprimanded for their part in this regrettable occurance and steps have been taken to ensure against any similar happening in the future.

CELANESE CHEMICAL COMPANY • 354 DOREMUS AVENUE, NEWARK, N. J. 07105 • TELEPHONE: 201—589-2705
A DIVISION OF CELANESE CORPORATION

50-1-18-2

8. Please advise should any further information be needed.

Very truly yours,

CELANESE CHEMICAL CO., INC.

E. F. Gold
Terminal Superintendent

EFG:vgs

cc: W. D. Coble - Newark
R. E. Larsen - Dallas
J. T. Sixeas - Newark
N. V. Bisonni - Newark
J. K. Stafford - Dallas

CELANESE
CHEMICAL COMPANY, INC.

NEWARK TERMINAL

January 20, 1981

81-1-14-10

Office of Hazardous Substances Control
120 Route 156
Yardville, New Jersey 08620

Attention: Mr. Bruce Comfort

Gentlemen:

Detailed below are the events and action taken during the cooling tower overflow and spill which occurred on 1/14/81, in the Celanese Newark Terminal, at 354 Doremus Avenue.

At 6:14 P.M. on 1/14/81, Bill Stuckey, Assistant Duty Officer for the U.S. Coast Guard, was notified by the Celanese Newark Terminal (Danny Walker, Terminal Manager) that a cooling water tower had overflowed due to a frozen make up water valve and had spilled cooling water into plum creek. Plum creek is located adjacent to the Celanese Newark facility. In addition to notifying the U.S. Coast Guard, Mr. Don Matzer, Trenton dispatch for NJDEP, was notified of the incident.

The spill of cooling tower water occurred on the AM of 1/13/81 and was not discovered until approximately 4:00 P.M. on 1/14/81. The cooling water spill was approximately 14,000 gallons of 20-30 ppm chromate ($CrO4^{-}$) in potable water, and about 2,000 gallons of this material made its way to plum creek. Since the ambient temperature was 13-14°F, the material immediately froze as a layer on an already completely frozen plum creek. Since the material in essence is water, it was extremely difficult to determine that a spill had even occurred. A frozen sample was taken from plum creek when the spill was suspected, and analytical analysis revealed 8 ppm chrome in a concentrated frozen section. Since this creek when flowing normally goes to the Passaic River, and even though the 8 ppm chrome was in the concentrated state, clean up operations of the surrounding ground area and plum creek were initiated.

CELANESE

Dirt around the cooling tower area was excavated and new dirt, rock, and gravel subsequently placed in the excavated area. The 2,000 gallons was cleaned up in plum creek by the physical cutting and removal of a 45' by 25' by 3' frozen area by utilizing ice cutting saws. The frozen sections were removed by using heavy equipment and subsequently placed in dump trucks. The final disposition of the frozen material was to allow the ice to thaw on facility concrete areas and drain to our effluent disposal POTW. This by the way is the normal disposal for the cooling tower blowdown and therefore presented a very simplistic disposal scheme. Final clean up operations were followed by chromate analysis of various sections of plum creek with a 0 chromate residual.

Thanks again to you and Richard Chapin (technical assistance for Emergency Respons of USEPA) for your assistance in this matter.

Very truly yours,

CELANESE CHEMICAL CO., INC.

J. D. Walker
Terminal Superintendent

JDW:vgs

cc: W. D. Coble
W. H. Harrison
R. E. Larsen
J. K. Stafford
G. F. Houlihan Phil Roland Eddie Bodin
G. A. Rodenhousen

DATE 08 - 16 - 87 (Mo) (Day) (Yr) REC'D BY Jones via Marshall BER Region I @ 11:15 (Office)

INCIDENT REPORT BY:
Name Peter Aitord Phone 201-589-2705 ...
Street 354 Doremus Ave
City Newark. State
Affiliation/Title Celaneses Chemical Co

INCIDENT LOCATION: ___ Transportation ✓ Facility ___ Other
Name (Site): Celaneses Chemical Co Phone 201-589-2705
Street 354 Doremus Ave
City Newark County Essex State NJ Zip Code
Date of Incident: 08 - 16 - 87 (Mo) (Day) (Yr) Time: 08:30

IDENTITY OF SUBSTANCE(S) SPILLED, RELEASED, ETC.: ___ Known ___ Suspected ___ Unknown
Name of Substance(s) [Gas, Liquid, Solid]: Formic Acid
CAS Number:
Amount Released/Spilled Unk ___ Actual ___ Potential ___ Estimated
Substance Contained (Y/(N)/U)
Type of Release/Spill: ✓ Terminated ___ Continuous ___ Intermittent
Hazardous Material ((Y)/N)

NATURE OF INCIDENT: ___ Complaint ✓ ~~Munic.~~ Notification ___ Emergency ___ Sub. 20

INCIDENT DESCRIPTION:
___ Fire ___ Explosion ___ Air Rel ✓ Spill ___ MVA ___ Derailment ___ Smoke/Dust
___ Odors ___ Sewage ___ NJPDES ___ Noise ___ Illegal Dumping ___ Wildlife
___ Equip Start-up/Shutdown, Equip Fail/Upset, etc.
___ Other (specify)
Injuries (Y/(N)/U) Public Exposure (Y/(N)/U)
Facility Evacuation (Y/(N)/U) Police at Scene (Y/(N)/U)
Contamination of ___ Air ✓ Land ✓ Water Assistance Requested (Y/(N)/U)
Potable Water Source (Y/N/U) Wind Direction/Speed /
Receiving Water Plum Creek Precipitation (rain/snow)
Location Type: ___ Residential ✓ Industrial ___ Rural ___ Sensitive Population (Hosp., School, Nurs. Home)

STATUS AT INCIDENT SCENE Celanes is performing clean up and will perform water tests

RESPONSIBLE PARTY: ✓ Known ___ Suspected ___ Unknown
Company Name Celanese Chemical Co Phone 1-201-589-2705
Contact Peter Aitord Title Supervisor - Env + Safety
Street 354 Doremus Ave
City Newark County Essex State NJ Zip Code

OFFICIALS NOTIFIED (Name/Title):
NJSP: / Phone Date/Time / (T/M)
Local Health / Phone Date/Time / (T/M)
Local Munic: / Phone Date/Time / (T/M)
USEPA: / Phone Date/Time / (T/M)

INCIDENT REFERRED TO:
___ DEQ ___ DWR ___ DSWM ___ DHSM ___ DHWM ___ DOH ___ DFG ___ DPF ___ DCJ ___ DCR
Region: ___ Northern ___ Metro ___ Central ___ Southern ___ ER1 ___ ER2
1. Name/Affil Larry / ER Phone Date/Time / (T/M)
2. Name/Affil / Phone Date/Time / (T/M)
3. Name/Affil / Phone Date/Time / (T/M)

IMMEDIATE DEP RESPONSE (Y/N) [Emergency (Y/N) Enforcement (Y/N)]

COMMENTS

TIERRA-B-015585

1/17

Form DEP-061 B
3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

DUTY OFFICER UPDATE LOG

CASE NO. 87 (Yr) - 08 (Mo) - 16 (Day) - 1102 (Time)

TIME	UPDATE/COMMENTS
1525	UPDATE FROM A. LAWN DIDN'T NOTIFY FOR THREE HOURS, STREAM HAS BEEN THROUGH TIDE CYCLE. PH OF DOWN STREAM IS. RP WILL GET CONTRACTOR EITHER TONIGHT OR TOMORROW. ALAN STATED THERE ARE NO CHANGES OF MATERIAL GETTING OFF SITE. NO IMPACT. ADVISED ALAN TO TELL RP TO REFER CASE TO DHWM-NJ

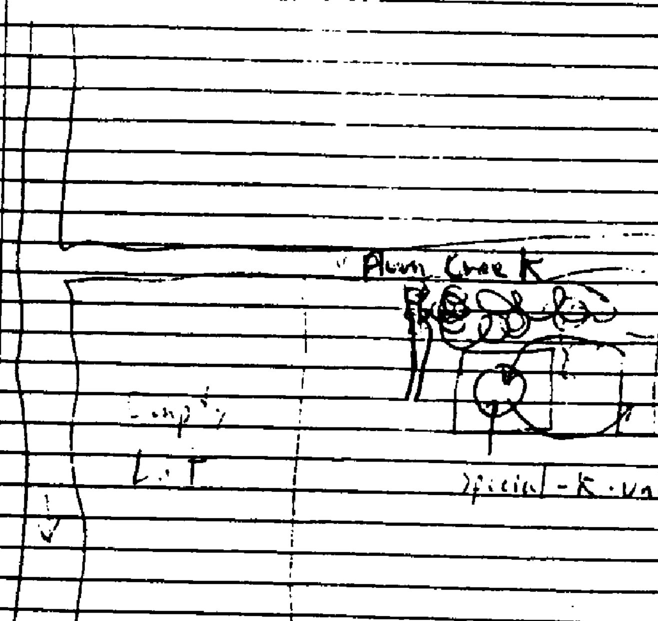
Form DEP-061 B
3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

DUTY OFFICER UPDATE LOG

CASE NO. 87 - 08 - 16 - 1102
(Yr) (Mo) (Day) (Time)

TIME	UPDATE/COMMENTS
1545	Latyn arrived on site. Met with Celanese Representatives Adam Spencer - Operations Supervisor and Peter Aitke - Lab Safety + Health Supervisor. Aitke stated that formic Acid was being used to [redacted] clean out a piece of equipment called a special-K-Unit. The product was being pumped from the tank truck, through the unit, then back to the tank truck. A fitting on the tank truck leaked causing [redacted] 150 gallons of formic Acid to spill. The area was immediately hosed down diluting the acid.
	Coast Guard arrived at 12:15 and asked to be updated.



New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Emergency Response

INVESTIGATION

Case #: 87-08-16-1102 File #: 07-14

Investigator: Alan Latyn Date: 8/16/87 Time Arrived: 1433 Time Departed: 1653

Location: Celanese Chemical Co. Property Owner:

Address: 354 Doremus Avenue Mailing Address:

Newark, NJ

Location Phone #: (201) 589-2705

Health Dept. Rep: Phone #:

Origin of Complaint: Peter Aitoro Phone #: (201) 589-2705

Nature of Complaint: Notification was received from Peter Aitoro - Environmental & Safety Supervisor, that the Celanese Chemical Company had 150 gallons of formic acid spilled during a clean up operation.

Findings:

1433 Hrs: Latyn arrived on site. Met with Celanese representatives Adam Spencer - Operations Supervisor, and Peter Aitoro - Lab Safety & Health Supervisor. Aitore stated that formic acid was being used to clean out a piece of equipment called the "Special-K-Unit." The product was being pumped from a tank truck, through the unit, and then back again. A fitting on the tank truck return line leaked, allowing 150 gallons for formic acid to spill. The area was immediately hosed down, thus diluting the acid. In the process some of the diluted acid entered Plum Creek.

1455 Hrs: Spencer, Aitore, and Latyn inspect spill area. An area approximately 15 x 40 foot around the tank had been affected. There wasn't any acid remaining, only contaminated soil. Latyn took pH readings upstream, downstream, and at the point where the acid entered the stream. All readings came up between 5½ and 6½. The creek had already been through a whole tidal cycle. No dead fish were observed in the creek.

Aitore stated that representatives from the U.S. Coast Guard arrived at 1215 hours, and asked to be contacted after the clean up was completed.

1530 Hrs: Latyn updated Trenton Dispatch and Lester Jones.

1535 Hrs: Latyn instructed Aitoro to call some contractors to do the clean up. Aitoro stated he would begin calling, but felt that none of the contractors would be able to respond until Monday morning.

1545 Hrs: Latyn secured site.

Conclusions:

The Celanese Chemical Company had 150 gallons of formic acid spilled during a clean up operation. Most of the product remained on site, but some acid did enter Plum Creek. The spill did not appear to have any impact on the creek.

Recommendations:

It is recommended that this case be referred to Hazardous Waste Management Metro's office for further action.

Case No. 87-08-16-1102 ERI

Alan Latyn — Investigator/Author — 8-18-87 — Date

M. Allen — Supervisor — 8/21/87 — Date

APPENDIX F

Question #13A:
DESCRIPTION OF KNOWN SPILLS
for
Celanese Chemical Company, Inc.
Newark Terminal
Newark, New Jersey

ECRA Case No. 86973

June, 1987

Prepared by

ENVIRON Corporation
210 Carnegie Center, Suite 201
Princeton, New Jersey 08540

During the operation of the Celanese facility, accidental discharges of chemical products have occurred. Discharges resulting from equipment failure or operator error are carefully evaluated by Celanese, and appropriate measures are taken to prevent reoccurrences. Although it is not possible to prevent all equipment failures or to eliminate human error, Celanese has sought to minimize environmental contamination through the construction of lined cement dikes around many of the aboveground storage tanks and the installation of catch pans and sumps in tank car and tank truck loading and unloading areas. Other preventive measures include a rigorous maintenance program and safety meetings with operators and supervisors. The program for preventing environmental contamination is detailed in the Discharge Prevention, Countermeasure and Control Plan (DPCC) which is included in Appendix G.

The history of spills and accidental discharges at the facility was constructed based upon interviews with Celanese personnel and a review of plant spill report records. Celanese has kept detailed spill records since 1981. Celanese has kept these internal records in an effort to improve safety and control product loss.

The general practice for cleanup of spills has been to place sorbent material on the area following remedy of the spill source. Sorbent material is then drummed, and disposed of in an appropriate manner. In the following paragraphs, recorded spills are discussed according to the

area in which they occurred. In most cases, Celanese followed standard cleanup procedures; however, in cases where action was taken beyond the usual procedures, such actions are described. A summary of all spills described in this appendix is provided in Table 13A.1. This list includes spills of Celanese products which are not considered to be hazardous substances under ECRA. Spills are also shown on Figure 13A.1. In cases where spills may have resulted in environmental contamination, reference is made to the appropriate section of the Sampling Plan (Appendix E) where the item is addressed. (Spill locations shown on the map are based on available records; in some cases, exact locations can not be precisely defined, because spills were recorded by general area. For instance, records for spills in the tank truck loading areas do not specify exactly where in the areas the spill occurred.)

West Farm

1. West Farm Tank Car Loading Area and Pipe Rack (North)

The rail car loading area is currently underlain by fiberglass catch pans located between and on both sides of the railroad tracks. Runoff from the catch pans drains to nearby sumps which are connected to the sewer system. Prior to installation of the runoff control system in the early 1980s, the area under the tracks was unpaved, and operators placed catch pans under rail cars during loading operations. This area is being addressed as AEC 2 in the Sampling Plan.

a) On July 9, 1985, approximately 60 gallons of acrylic acid discharged through a faulty valve on a tank truck which was being loaded from a tank car. The valve was closed and the discharge was immediately stopped.

b) On November 23, 1983, approximately two gallons of heptanoic acid discharged from a faulty expansion joint located on the overhead pipe bridge at the west end of the loading rack. The joint was immediately repaired, and the acid was diluted with water and pumped into a tank truck. The area under the pipe rack is paved; however, an area of eroded asphalt where residues of the material could have drained is addressed as AEC 3 in the Sampling Plan.

2. Main Cooling Tower

On February 13, 1982, approximately 100 gallons of water overflowed from the cooling tower. It was recorded that the water, which was a dilute chromate solution, drained westward to Plum Creek. This drainage area west of the cooling tower is addressed as AEC 17 in the Sampling Plan.

3. Undiked Tank Farm (North)

a) On March 9, 1982, approximately 150 gallons of pelargonic acid discharged through a broken pipe leading to Tank 57. The acid immediately solidified on the cold ground (the melting point of pelargonic acid is 54.5°F), and was collected by maintenance workers with shovels. The material was drummed and disposed of as hazardous waste.

b) On May 12, 1976, approximately 10,000 gallons of methanol discharged from Tank 40. A significant quantity of the material immediately volatilized, and some of the product reportedly drained into Plum Creek. The area of the methanol discharge is addressed as AEC 16 in the Sampling Plan.

c) Sometime in 1970 or 1971, approximately 10,000 gallons of ethylene glycol reportedly discharged from pipes on a concrete pad between Tank 54 and Tank 55. The area immediately adjacent to the pad and the nearby drainage area are addressed as AECs 19 and 20, respectively, in the Sampling Plan.

4. West Farm Tank Truck Loading Area and Pipe Rack

Seven spills have been recorded at the truck loading rack since 1981. The entire area has been covered with acid-resistant concrete paving since the early 1980s and the area is curbed and sloped to direct spills into drains connected to a collection sump which

discharges to the sewer system. Prior to 1983, the area was paved with asphalt, as indicated in the site paving diagram (Figure 10.4, Appendix B). The entire truck loading area is addressed as AEC 23 in the Sampling Plan.

a) On December 11, 1985, a loading rack pipe which contained ethylene glycol was accidentally cut. Less than five gallons of ethylene glycol discharged before the leak was stopped and the line was repaired.

b) On October 26, 1983, approximately 50 gallons of vinyl acetate discharged through a cracked valve in a tank car which was being loaded. The operator responded by closing the valve on the vinyl acetate supply line.

c) On August 2, 1983, approximately one gallon of isobutyl acetate was accidentally discharged when a valve was being checked.

d) On July 3, 1983, approximately five gallons of n-butyl alcohol were discharged when the drain valve on a tank truck was accidentally left open during loading. The valve was immediately closed, preventing further discharge of the material.

5. Diked Tank Farm (North)

Four incidents have been recorded within the diked tank farm located north of the warehouse (W-3). The areas where the spills occurred have been paved with concrete since 1984. The diked areas

tracks. Runoff from the catch pans drains to nearby sumps which are connected to the sewer system. Prior to installation of the runoff control system in 1983, the area under the tracks was unpaved, and operators placed catch pans under rail cars during loading operations. This area is being addressed as AEC 22 in the Sampling Plan.

a) On February 13, 1985, approximately 550 gallons of 50% formaldehyde solution discharged at the loading rack when a full rail car was accidentally connected to a fill hose.

b) On September 28, 1984, approximately 100 gallons of ethyl acrylate discharged from a leaking flange of a railroad car which was being unloaded. A catch pan was placed under the flange, and the material was pumped into a tank truck.

c) On March 17, 1982, approximately 80 gallons of vinyl acetate discharged through a crack in a 2-inch diameter loading hose. The hose was subsequently replaced.

7. Undiked Tank Farm (South)

On April 28, 1984, a gasket on the check valve on Tank 62 failed, allowing 300 gallons of formaldehyde to discharge toward Plum Creek. The valve was locked, and the leak stopped. Subsequently, similar gaskets on other tanks were inspected. In

addition, a runoff channel to Plum Creek located near Tank 63 was filled with soil following the incident. The area of the formaldehyde discharge is addressed as AEC 32 in the Sampling Plan.

8. Formaldehyde Ion Exchange Building

In the five years during which the West Farm Formaldehyde Ion Exchange (F.I.E.) Building (W-9) has operated, four spills have been recorded within the building. Drainage from the F.I.E. Building is controlled by sumps which are connected to the sewer system. Sampling within the building related to spills is not proposed in the Sampling Plan because the floor is entirely covered with concrete and spills would drain into the sump associated with the sewer.

a) On September 19, 1985, approximately five gallons of 50% formaldehyde solution discharged in the F.I.E. Building through a cracked hose. The material was promptly cleaned up by the operator and the hose was replaced.

b) On September 13, 1985, approximately five gallons of 50% formaldehyde solution discharged in the F.I.E. Building through a cracked hose. The hose was subsequently replaced.

c) On December 13, 1984, approximately 1,500 gallons of 50% formaldehyde solution discharged to the sewer system from the F.I.E. unit because a valve was left open accidentally.

d) On April 25, 1984, approximately 400 gallons of 50% formaldehyde solution discharged to the sewer system from the F.I.E. unit because of an improper valve setting.

9. Methanol Oxidation Process Unit (W-7)

On August 26, 1985, approximately 80 gallons of Dowtherm fluid discharged from the Methanol Oxidation (M.O.) Unit because a valve accidentally left in the closed position caused an overpressurization of the exchange compartment. The area around the M.O. unit is addressed by AEC 31 in the Sampling Plan.

East Farm

10. Diked Tank Farm

The entire diked East Tank Farm, with the exception of the diked area around Tanks 35 and 11, is currently paved with concrete. The floor of the East Tank Farm was paved area-by-area in 1984 and 1985. Diked areas where spills occurred on unpaved ground are addressed as AECs 42, 44, 45, and 46 in the Sampling Plan. Areas where spills discharged on concrete dike floors are not addressed because cleanup prevented environmental contamination.

a) On November 9, 1985, approximately three gallons of methanol spilled from the pipeline between Tanks 15 and 16 and ignited by static electricity. The material completely burned off as a result of the fire. The methanol spilled because a check valve failed; the check valve was repaired following the incident.

b) On August 29, 1985, approximately twenty gallons of 50% formaldehyde solution were discharged into the containment dike for Tank 14 when a hose coupling failed. The hose coupling was subsequently repaired.

c) On June 6, 1985, approximately 317 gallons of isopropyl acetate discharged to the paved floor of the containment dike when Tank 7 was accidentally overfilled.

d) In 1985, before the concrete floor was installed within this dike, approximately 2,000 gallons of No. 6 fuel oil discharged from Tank 21. Approximately 125 tons of contaminated soil were removed from the area around the tank and sent to SCA Chemical Services in Model City, New York. Manifests for the waste are included in this appendix.

e) On March 29, 1984, approximately 300 gallons of No. 6 fuel oil were released when Tank 21 was accidentally overfilled.

f) In approximately 1962, following a period of long inactivity, a mass balance of the contents of Tank 35 was performed. A discrepancy of approximately 20,000 gallons of Celanese Solvent 601 (CS601) was noted. CS601 is believed to have been a mixture of methyl ethyl ketone and various aldehyde compounds.

g) On October 19, 1984, before the concrete floor was installed within this dike, Tank 13 overflowed and discharged approximately 7,600 gallons of 50% formaldehyde solution into the surrounding containment dike. Celanese notified NJDEP, the City of Newark, and the National Response Center of the spill on the morning of October 19. Approximately 5,500 gallons of formaldehyde solution which had pooled within the containment dike was pumped into tank trucks within five hours of discovery of the spill. In addition, areas of the containment dike in which material had pooled were flushed with water and the resulting liquid (approximately 5,000 gallons of 5% formaldehyde solution) was transferred to an empty storage tank for formaldehyde reclamation.

Following the spill, test holes were dug around the containment dike to the water table, which was observed 2-3" below ground surface, and water samples were collected. Reported formaldehyde concentrations in the samples ranged from 0.04-2.00%.

On October 20, 1984, UN Envirosystems, an approved disposal company, excavated approximately 115 tons of soil from the area around the tanks. Soil was excavated to the water table in an area of approximately 1,000 square feet. Manifests for disposal of the contaminated soil are included in this appendix.

Trenches were constructed near the containment dike and collected ground water was pumped to the sewer.

11. Old Formaldehyde Ion Exchange Building (B-5)

Three spills have been recorded in the East Farm Formaldehyde Ion Exchange (F.I.E.) Building (B-5) since 1981. The building has been inoperative since 1984; however, while the building was in use, normal operating wastes discharged into the sewer system through floor drains connected to the sump located south of the building. Areas around the building where discharges may not have been completely contained by the sumps will be addressed as AEC 48 in the Sampling Plan.

a) On October 27, 1983, approximately 1,200 gallons of 50% formaldehyde solution discharged from the filter press on the F.I.E. unit when a disc failed. The disc was subsequently repaired.

b) On February 1, 1983, approximately 150 gallons of 50% formaldehyde solution discharged from the F.I.E. unit when a clogged pipe induced the failure of a rupture disc. The spill was pumped off the floor, the pipe was promptly cleared, and the disc was replaced.

c) On October 20, 1982, approximately 362 gallons of 50% formaldehyde solution discharged from a rupture valve

outside from the F.I.E. unit. The valve was subsequently repaired. Some of the spilled formaldehyde solution reportedly drained into the sump south of the building.

12. Undiked Tanks (17, 18, and 19)

a) On April 5, 1986, approximately 10,500 gallons of 31% formaldehyde solution discharged through the scrubber vent for Tank 18 when the tank was accidentally overfilled. It was recorded that the discharge drained into the nearby sewer connected to the sewer system. The area around the scrubber vent is addressed as AEC 50 in the Sampling Plan.

b) On July 31, 1985, approximately 100 gallons of 50% formaldehyde solution discharged from a defective valve on the pipeline near Tank 18. The valve was promptly repaired. The area where the discharge may have drained is addressed as AEC 49 in the Sampling Plan.

13. East Farm Tank Car Loading Area and Pipe Rack

The rail car loading area is currently contained by fiberglass catch pans located between and on both sides of the railroad tracks. Runoff from the catch pans drains to nearby sumps which are connected to the sewer system. Prior to installation of the runoff control system in 1983, the area under the tracks was unpaved, and

operators placed catch pans under rail cars during loading operations. The loading area is addressed as AECs 55 and 56 in the Sampling Plan.

a) On January 6, 1986, a truck collided with the containment dike wall near Tank 1. The truck's fuel drain valve cracked, resulting in the discharge of approximately 20 gallons of diesel fuel to the surrounding asphalt. Approximately 15 gallons of fuel were recovered and pumped into an empty tank. Sorbent pads used to recover the remainder of the spilled material were placed in a 55-gallon drum and were disposed of as hazardous waste.

b) On October 22, 1985, approximately 10 gallons of 45% formaldehyde solution were accidentally discharged near the loading rack from a hose which had developed a pinhole leak. The hose was promptly replaced.

c) On April 16, 1984 approximately 5 gallons of propionic acid discharged from a valve in the rail car loading area when a gasket failed. The gasket was subsequently replaced.

d) On November 18, 1983, a tank truck fuel line broke when a truck driver attempted to maneuver around a tank car at the end of the loading rack. Approximately 3 gallons of diesel fuel spilled. The remaining contents of the truck's fuel tank were transferred to a nearby empty tank.

e) On February 11, 1982, approximately 400 gallons of ethyl acetate discharged from a cracked hose as a tank car was being unloaded. The hose was immediately replaced. The spill was supposedly contained in the area around the scrubber building.

f) In 1980, 5,000 gallons of acrylic acid spilled from a rail tank car in the loading area. Four dump trucks full of soil were removed off-site.

14. East Farm Tank Truck Loading Area and Pipe Rack

Two spills have been recorded in the truck loading area since 1981. The area is drained by a nearby sump connected to the sewer system. The truck loading area is addressed as AEC 58 in the Sampling Plan.

a) On April 22, 1983, approximately 30 gallons of ethyl acetate leaked from a cracked valve on a tank truck. Most of the material drained into caustic cans which were placed under the valves. However, it was estimated that 5-10 gallons of material were not collected in the cans.

b) On October 4, 1982, approximately five gallons of acetic anhydride were discharged from a faulty valve on a tank truck which was being loaded.

15. Drumming Area, East Farm Warehouse (B-1)

Celanese maintained a drumming operation in Building B-1 until January, 1987. Materials which were stored in the aboveground tanks were drummed on a concrete floor in the warehouse. Because the entire area is covered by a concrete floor and floor drains are connected to the sewer system, spills did not discharge to the environment. Thus, sampling related to these spills is not proposed in the Sampling Plan.

a) On September 14, 1983, approximately 10 gallons of ethyl acrylate accidentally discharged in the warehouse from an overfilled drum.

b) On July 21, 1983, approximately 20 gallons of vinyl acetate were discharged in the warehouse from a hose which cracked while a sample was being collected.

16. Pipeline to Loading Dock

In the late 1970s, a molten sulfur pipeline attached to Celanese's dock ruptured. This pipeline was owned and operated by Essex Chemical Company, Celanese's neighbor to the north. Operation of the pipeline was discontinued after the spill. The molten material froze (the melting point of sulfur is approximately 115°C) as it discharged into the Passaic River.

Table 13A.1: Summary of Spills

West Farm

Spill Identification	Date	Material	Approximate Volume (Gallons)
1a	7/9/85	Acrylic Acid	60
1b	11/23/83	Heptanoic Acid	2
2	2/13/82	Cooling Water	100
3a	3/9/82	Pelargonic Acid	150
3b	5/12/76	Methanol	10,000
3c	1970-1971 *	Ethylene Glycol	10,000
4a	12/11/85	Ethylene Glycol	<5
4b	10/26/83	Vinyl Acetate	50
4c	8/2/83	Isobutyl Acetate	1
4d	7/3/83	N-butyl Alcohol	5
5a	7/1/85	Acetic Acid	60
5b	4/28/82	Methyl Acrylate	250
5c	2/17/82	Acetic Acid	300
5d	9/8-9/14/81 *	2-Ethylhexyl Acrylate	1,700
6a	2/13/85	50% Formaldehyde	550
6b	9/28/84	Ethyl Acrylate	100
6c	3/17/82	Vinyl Acetate	80
7	4/28/84	Formaldehyde	300
8a	9/19/85	50% Formaldehyde	5
8b	9/13/85	50% Formaldehyde	5
8c	12/13/84	50% Formaldehyde	1,500
8d	4/25/84	50% Formaldehyde	400
9	8/26/85	Dowtherm Fluid	80

* Spill occurred at some time during the time period listed.

Table 13A.1: Summary of Spills (continued)

East Farm

Spill Identification	Date	Material	Approximate Volume (Gallons)
10a	11/9/85	Methanol	3
10b	8/29/85	50% Formaldehyde	20
10c	6/6/85	Isopropyl Acetate	317
10d	1985 *	No. 6 Fuel Oil	2,000
10e	3/29/84	No. 6 Fuel Oil	300
10f	1962 **	Celanese Solvent 601	20,000
10g	10/19/84	50% Formaldehyde	7,600
11a	10/27/83	50% Formaldehyde	1,200
11b	2/1/83	50% Formaldehyde	150
11c	10/20/82	50% Formaldehyde	362
12a	4/5/86	31% Formaldehyde	10,500
12b	7/31/85	50% Formaldehyde	100
13a	1/6/86	Diesel Fuel	20
13b	10/22/85	45% Formaldehyde	10
13c	4/16/84	Propionic Acid	5
13d	11/18/83	Diesel Fuel	3
13e	2/11/82	Ethyl Acetate	400
13f	1980 *	Acrylic Acid	5,000
14a	4/22/83	Ethyl Acetate	30
14b	10/4/82	Acetic Anhydride	5
15a	9/14/83	Ethyl Acrylate	10
15b	7/21/83	Vinyl Acetate	20
16 ***	Late 1970s	Molten Sulfur	Unknown

* Spill occurred at some time during the time period listed.
** Spill occurred at approximately this date.
*** Spill consisted of Essex Chemical materials being unloaded at the Celanese dock.

NEW JERSEY STATE POLICE

3. Station/Unit	4. Code	5. Area Code, Phone Number and Extension	6. Prosecutor's Case Number	7. Uniform Case Number
Newark Bay Station	F010	201-578-8173		F0109292

8. Crime/Incident	9. NJSA	9. Weather	9. Domestic Violence	10. Bias Incident	11. Gang
Pollution (Chemical)	23:5-28	Clear	Yes: No: X	Yes: No: X	Yes: No: X

Date & Time	12. Between	13. Hour	14. Day of Week	15. Month	16. Date	17. Year
	At: X	3:20 PM	Mon	02	04	06	92

18. Crime/Incident Location: Passaic River Behind 354 Doremus Ave.

19. Municipality	20. County	21. Code	22. Type of Premises	23. Code	24. Weapons/Tools	25. Code
Newark	Essex	0714	Open Country	20	N/A	N/A

26. Victim (First, Middle, Last): State Of New Jersey

27. Victim's Complete Address / Area Code, Phone Number and Extension:

28. Social Security Number	29. D.O.B.	30. Sex	31. Race Code	32. Victim's Employer, City, State / Area Code, Phone Number and Extension

33. Person Reporting Crime/Incident: MPO Russell J. Langill #9706

34. Complete Address and Phone Number:

35. Date and Time Reported: 04-06-92, 3:20 PM

36. Modus Operandi/How Committed: A pipe leak, caused product to flow into the Passaic River.

37. Vehicle	38. Year	39. Make and Model	40. Body Type	41. Color	42. Registration No. & State	43. V.I.N. or Distinguishing Marks

VALUE STOLEN PROPERTY	44. Currency	45. Jewelry	46. Furs	47. Clothing	48. Motor Vehicle	49. Miscellaneous	50. Total Value Stolen	51. Total Value Recovered
	N/A	N/A	N/A	N/A	N/A	N/A		

52. Alarm Number/Type	53. Technical Services	54. Technician	55. Technician's Agency	56. Chemical Lab. Number	57. Ballistics Lab. Number

58. Alcohol Involved	59. Other Drugs Involved
Yes: No: Unk. X	Yes: No: Unk. X

60. Evidence: None X

	Yes	No
NJSP - SBTS		
Retained		
Returned		
Destroyed		

61. Items of:

	Yes	No
Arrest Report Pending		X
Prop./Veh. Report Pend.		X
Agency Pending		X
Evidence Pending		X

62. MV Summons/Warning Number / Status Number

63. VCCB Information and Phone Number Provided (1-800-242-0801): Yes: No: N/A: X

64. No. Arrest/Summ.	65. Adult	66. Juvenile	67. Status Crime	68. Status Case	69. DO Case Number	70. Accident Case Number
1	1	0	Admin Cl.	Court		

List Arrested/Summoned — List and Identify Additional Victims — Describe Perpetrators/Suspects — Date Action Taken. Include Findings and Observations of Investigator — Physical Evidence Found — Where, by Whom — Disposition and Technical Services Performed — Interview of Victims, Witnesses, Persons Contacted — Suspects — Attach Victim Property Loss Report — Attach Statements — Court Action — AS NCIC Entry/Inquiries — Prisoner Disposition.

71. Name/Address of Arrested/Summoned / 72. Criminal Complaint Warrant/Summons No. / 73. Age / 74. Sex / 75. Race Code / 76. D.O.B.

Hoechst Celanese, 354 Doremus Ave. Newark N.J. 07105, MP 91081

On the above date and time, MPO Mueller #9666 and the undersigned, were detailed to the scene, ref pollution. While at the scene, the undersigned spoke with George J. Drahos, Safety/Health Environmental Analyst, who stated that a pipe leaked out Butyl Acrylate into the Passaic River, spilling an unknown amount of product into the Passaic River. The pipe was shut down and flushed out. During the investigation I could smell an odor in the air, the undersigned spoke to Mr. Drahos about the smell, he stated that the small was from the pipe being flushed out. The undersigned then observed the pipe where the product was leaking from which had stopped prior to this officer arriving on scene, I did not notice any product in the water at that time. The undersigned then advised Mr. Drahos that his Co. was in violation of 23:5-28 and was issued summons # MP 91081.

77. Officer's Name / Print or Type	78. Page	80. Date of Report	81. Badge or Badge Number
MPO Russell J. Langill #9706	1 of 1	04-09-92	EMT 9536

Signature: X MPO Russell J. Langill #9706

82. | 83.

S.P. 310 (Rev. 1/91) (S.O.P. D7)

BBA000044

TIERRA-B-015608

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

Henry Benz, President
Hoescht Celanese Chemicals, Inc.
Route 202-206
P.O.Box 2500
Somerville, New Jersey 08876

RE: Diamond Alkali Superfund Site
Notice of Potential Liability for
Response Actions in the Lower Passaic River, New Jersey

Dear Mr. Benz:

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 Hoescht Celanese Chemicals, Inc. ("Hoescht Celanese") 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 Hoescht Celanese's facility located at 354 Doremus 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, Hoescht Celanese may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

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

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

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

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

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

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

Sincerely yours,

George Pavlou, Director
Emergency and Remedial Response Division

Enclosure

cc: Anne Conley-Pitchell, Esq.
Hoescht Celanese Corp.

PRPs in Receipt of Notice Letters:

PRP	Legal Counsel
J. Roger Hirl President and Chairman of the Board Occidental Chemical Co. Occidental Tower 5005 LBJ Freeway Dallas, Texas 75244	Paul W. Herring, Esq. Andrews & Kurth L.L.P. 1717 Main Street, Suite 3700 Dallas, Texas 75201
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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
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