GARFIELD MOLDING COMPANY, INC.

ECRA CASE 88439

SITE EVALUATION SUBMISSION

October 20, 1988

J. H. CROW COMPANY, INC.

216 Stiger Street
Hackettstown, N.J. 07840

Telephone (201) 852-4855
Fax No. (201) 852-5275

ECRA-002
12/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
INDUSTRIAL SITE EVALUATION ELEMENT
CN 028, TRENTON, N.J. 08625

ENVIRONMENTAL CLEANUP RESPONSIBILITY ACT (ECRA)

INITIAL NOTICE

SITE EVALUATION SUBMISSION (SES)

This is the second part of a two-part application form. This information must be submitted within 45 days following any applicable situation as specified at N.J.A.C. 7:26B-1.5 or any triggering event as specified at N.J.A.C. 7:26B-1.6. Please refer to the instructions and N.J.A.C. 7:26B-3.2 before filling out this form. Answer all questions. Should you encounter any problems in completing this form, we recommend that you discuss the matter with a representative from the Element. Submitting incorrect or insufficient data may cause processing delays and possible postponement of your transaction. Please call (609) 633-7141 between the hours of 8:30 a.m. and 4:30 p.m. to request assistance.

PLEASE PRINT OR TYPE

Date 10/20/88

1. Industrial Establishment

Name Garfield Molding Company, Inc.

Address 10 Midland Avenue

City or Town Wallington Zip Code 07057

Municipality Wallington County Bergen

A. Operational and Ownership History: *(Attach additional sheets if necessary)* See Attachment 1A.

Name	Owner/ Operator	From	To	Current Address

B. Brief description of past operation(s) conducted on site *(Attach additional sheets if necessary)*

See Attachment 1B

2. List all federal and state environmental permits applied for, or received, or both, at this facility *(Attach additional sheets if necessary)*

Check here if no permits are involved _____

A. New Jersey Bureau of Air Pollution Control

Permit Number	Certificate Number	Date of Approval or Denial	Reason for Denial (if applicable)	Expiration Date
051658		6/30/81	N/A	6/29/91
051659		7/13/81	N/A	7/12/91

B. New Jersey Pollutant Discharge Elimination System (NJPDES)

Number	Discharge Activity	Date Issued or Denied	Expiration Date	Body of Water Discharged Into
NJ0027146	DSW	1974?	Renewal Pending	Saddle River

C. United State Environmental Protection Agency (EPA) Identification Number and copy of the most recent generator Annual Report prepared pursuant to the New Jersey Hazardous Waste Regulations. *(If applicable)*

ID # NJD001270263

Is a copy of the Annual Report attached? X Yes (See Attachment # 2C) ____ No

D. Resource, Conservation, Recovery Act (RCRA) Permit # NJD0011427895

E. Bureau of Underground Storage Tank Registration Number(s) Submission Pending

F. All other federal, state, local governmental permits.

Agency Issuing Permit	Permit No.	Date of Approval or Denial	Expiration Date

3. Summary of Enforcement Actions for Violation of Environmental Laws or Regulations: See Attachment 3.

Check here if no enforcement actions are involved _____

A. Date of Action _____

Section of Law or Statute violated _____

Type of Enforcement Action _____

Description of the Violation _____

How was the violation resolved? _____

B. Date of Action _____

Section of Law or Statute violated _____

Type of Enforcement Action _____

Description of the Violation _____

How was the violation resolved? _____

4. Site Map

Is this map enclosed? X Yes (See Attachment # 4) _____ No

If No, state the reason _____

(Attach additional pages, if necessary)

5. Decription of Operations:

Is this report enclosed? X Yes (See Attachment # 5) ____ No

If No, state the reason _____

6. Description of Building Heating System:

A. How is the Industrial Establishment currently heated? (Oil, Gas, Electric) Gas

How long has the Industrial Establishment been heated by the above fuel/energy source: 7 years

B. Was the Industrial Establishment heated by fuel oil at any time: X Yes ____ No

Is information on the decommissioning of underground fuel oil tanks included with item No. 14 of this form?

____Yes X No If no, explain below: Underground fuel oil tank is still present on site.

C. Are the results of the Integrity Evaluation for Existing Underground Fuel Oil Tanks enclosed?

____Yes (See Attachment #_____) X No If no, state the reason Underground fuel oil tank is to be removed as part of site cleanup. Post excavation sampling will be done. Please see Attachment II, Sampling Plan.

7. Summary of Industrial Establishment Wastewater Discharges of Sanitary and/or Industrial Waste: See Attachment 7A

A. Discharge Period From	To	Discharge Type	Treatment By
_____	Present	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

B. If the Industrial Establishment discharges sanitary and/or industrial wastes to a publicly-owned treatment plant, provide the name/address of that facility.

Name Bergen County Utilities Authority Telephone # (201) 641-2552

Street Address P.O. Box 122

Municipality Little Ferry State NJ Zip Code 07643

	Date(s) of Discharge	Nature of Discharge
1.	1918? to present	Sanitary wastewater; cooling wastewater;
2.		boiler blowdown wastewater
3.		

8. Hazardous Substance and Waste Containment Description: *(Attach additional sheets if necessary)* See Attachment 8.

Type of Storage Unit	Date Installed	Area or Volumetric Capacity (include units)	Material Stored	Construction Type	Location Reference	Decommissioning or Sampling Reference

9. Hazardous Substance/Waste Inventory: See Attachment 9.

Material Name	Quantity (indicate units)	Location Reference	Storage Method Container Type/Size	Typical Annual Usage	To Remain on Site (Yes or No)

10. Discharge History of Hazardous Substances and Wastes:

A. Have there been any discharges of hazardous substances and wastes?
_____Yes (Complete Item B below) __X__No (Go to Item 10C)

B. Summary of Discharges and Resolutions

Description of Discharge Event	Response and Resolutions

C. Is this Industrial Establishment subject to Spill Prevention Control and Countermeasure (SPCC) per 40 CFR Part 112 or Discharge Prevention, Containment and Countermeasure (DPCC) Plan per NJAC 7:1E-4.1 requirements?

_____Yes __X__No A copy of the Plan(s) may be required at the discretion of the Department.

11. Sampling Plan Proposal

A. Is sampling proposed at the facility? __X__Yes (See Attachment #__11__) No_____

If sampling is not proposed, please explain below. *(Attach additional sheets if necessary)*

B. Is groundwater sampling proposed? _____Yes __X__No

Note: If groundwater sampling is proposed under the plan, you must complete ECRA Form 002A "Request for Hydrogeologic Assessment" and submit it with the application.

12. Decontamination/Decommissioning Plan

A. Is the facility Decontamination/Decommissioning Plan enclosed?

X Yes (See Attachment # 12) ____ No

B. If no, specify why decontamination/decommissioning is not considered necessary.

13. Historical Data on environmental quality at the Industrial Establishment

A. Were sampling results obtained on Environmental Quality for the Industrial Establishment?

X Yes (See Attachment # 13) ____ No

B. If sampling results were obtained but are not part of this application, please explain below:

14. List any other information you are submitting or which has been formally requested by the Department: N/A

Description	Attachment #

FEE CHECKLIST

Include below a breakdown of the total fee submitted with this application. (See N.J.A.C. 7:26B-1.10 for the appropriate fees.)

Item	Amount ($)
1. Initial Notice Review	
i. Without Sampling Plan	
ii. With Sampling Plan that includes only underground storage tank analysis without groundwater monitoring	
iii. With Sampling Plan other than ii. above or iv. below	$2,750.00
iv. With Sampling Plan that includes any groundwater monitoring	
2. Sampling Data Review	
3. Negative Declaration Review	
4. Cleanup Plan Review	
5. Oversight of Cleanup Plan Implementation	
TOTAL FEE ENCLOSED	$ $2,750.00

ARE FEES ENCLOSED? X YES

CERTIFICATIONS:

A. The following certification shall be signed by the highest ranking individual at the site with overall responsibility for that site or activity. Where there is no individual at the site with overall responsibility for that site or activity, this certification shall be signed by the individual having responsibility for the overall operation of the site or activity.

I certify under penalty of law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-8.

Typed/Printed Name Bruce L. Bauer Title President

Signature Bruce L. Bauer Date Oct 12, 1988

Sworn to and Subscribed Before Me
on this 12th
Date of 10/12 19 88

Michael J. Boldon
Notary

MICHAEL J. BOLDON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 2, 1992

B. The following certification shall be signed as follows:

1. For a corporation, by a principal executive officer of at least the level of vice president;
2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
3. For a municipality, State, Federal or other public agency, by either a principal executive officer or ranking elected official.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, 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. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate, or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-8.

Typed/Printed Name Bruce L. Bauer Title President

Signature Bruce L. Bauer Date Oct 12, 1988

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Typed/Printed Name Joseph A. Dolan Title Vice President

Signature Joseph A. Dolan V/P Date 10-12-88

Sworn to and Subscribed Before Me
on this 12th
Date of 10 19 88

Michael J Boldon
Notary

MICHAEL J. BOLDON
NOTARY PUBLIC OF NEW JERSEY
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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, 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. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate, or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-8.

Typed/Printed Name Joseph A. Dolan Title Vice President

Signature Joseph A. Dolan V/P Date 10-12-88

Sworn to and Subscribed Before Me
on this 12th
Date of 10 19 88

Michael J Boldon
Notary

MICHAEL J. BOLDON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 2, 1992

GARFIELD MOLDING COMPANY, INC.

ECRA CASE 88439

SITE EVALUATION SUBMISSION

October 20, 1988

ATTACHMENT 1A

Industrial Establishment

History of Ownership and Operations

Attachment 1A

Garfield Molding Company, Inc.
ECRA Case 88439
Site Evaluation Submission
Attachment 1A

Industrial Establishment
Operational and Ownership History:

Name	Owner or Operator?	Property Owned	From	To	Principal Owner	Current Address
Garfield Molding Company, Inc.	Industry Operator	N/A	1978	Present	Bruce Bauer, President	Garfield Molding Company, Inc. P.O. Box 40 Garfield, NJ 07026
Elizabeth M. Watson (formerly Elizabeth Bauer)	Property Owner	Block 71, lot 1 & block 26A, lot 13	1963	Present	Elizabeth M. Watson	c/o Richard R. Ahsler 225 Millburn Avenue, Suite 208 Millburn, NJ 07041
Garfield Manufacturing Company, Inc.	Industry Operator	N/A	1957	1978	Fred W. Bauer and heirs	Corporation dissolved.
Garfield Manufacturing Realty Company, Inc.	Property Owner	Block 71, lot 1 & block 26A, lot 13	1957	1963	Fred W. Bauer	Corporation dissolved.
Garfield Manufacturing Company, Inc.	Property Owner	Block 71, lot 1 & block 26A, lot 13	1918	1957	Bunting Howell, et al.	Corporation dissolved.
Garfield Manufacturing Company, Inc.	Industry Operator	N/A	1917	1957	Bunting Howell, et al.	Corporation dissolved.
Hemming Manufacturing Company, Inc.	Industry Operator	N/A	1908	1917		Corporation dissolved.
Hemming Manufacturing Company, Inc.	Property Owner	Block 71, lot 1	1908	1957		Corporation dissolved.

ATTACHMENT 1B

Industrial Establishment

Brief Description of Past Operations

Since 1908 the industrial establishment on this site has been molding plastics or other materials for use in the electrical industry. At the present time parts of the property are leased to an automotive repair business (SIC 7538), and to a direct mail advertising service (SIC 7331).

ATTACHMENT 2C

Annual Reports for New Jersey Hazardous Waste Generator

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF HAZARDOUS WASTE
GENERATOR'S ANNUAL REPORT
FOR YEAR OF 1982

1. GENERATOR'S NAME Garfield Manufacturing Company 2. EPA ID NO. NJ-D001270263
3. ADDRESS 10 Midland Ave. Wallington, N.J. 07026 (P.O. Box 40 Garfield, N.J. 07026) Telephone Number 201-777-5700
4. TRANSPORTER'S NAME L & L Oil Service 5. EPA ID NO. NJ D0011427895
6. ADDRESS 740 Lloy Road Aberdeen, New Jersey 07747
7. FACILITY'S NAME L & L Oil Service 8. EPA ID NO. NJ D0011427895
9. ADDRESS 740 Lloy Road Aberdeen, New Jersey 07747

10. MANIFEST NO.	DESCRIPTION OF WASTE	DOT HAZ. CLASS	QUANTITY	UNITS	EPA WASTE TYPE	REJECTED
NJ-0063375	Used Oil	ORM-E	300	gal.	X-726	
NJ-0109668	Used Oil	ORM-E	300	gal.	X-726	
NJ-0120089	Used Oil	ORM-E	250	gal.	X-726	

* - PLACE AN "*" UNDER THE REJECTED COLUMN FOR THOSE MANIFESTS REJECTED BY FACILITY.

JAG000213

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF HAZARDOUS WASTE
GENERATOR'S ANNUAL REPORT
FOR YEAR OF 1983

1. GENERATOR'S NAME Garfield Molding Company 2. EPA ID NO. NJ-D001270263
3. ADDRESS 10 Midland Ave Wallington, N.J. 07026 (P.O. Box 40 Garfield TELEPHONE (201) 777-5700
4. TRANSPORTER'S NAME None 5. EPA ID NO
5. ADDRESS
7. FACILITY'S NAME None 8. EPA ID NO
9. ADDRESS

10. MANIFEST NO	DESCRIPTION OF WASTE	DOT HAZ.CLASS	QUANTITY	UNITS	EPA WASTE TYPE	REJECTED
None (1983)						

No waste was manifested during 1983

1983

* - PLACE AN "*" UNDER THE REJECTED COLUMN FOR THOSE MANIFESTS REJECTED BY FACILITY.

JAG000214

ATTACHMENT 3

Summary of Enforcement Actions for Violation of

Environmental Laws or Regulations

A. Date of Action:
July 27, 1988

Section of Law or Statue Violated:
NJAC 7:14A-2.5a(9)iv.

Type of Enforcement Action:
Directive.

Description of Violation:
Failure to sample and file monitoring reports.

Resolution of Violation:
Sampling was completed as directed. Samples were taken on July 26, 1988. Results were submitted on August 17, 1988.

B. Date of Action:
July 27, 1988

Section of Law or Statue Violated:
NJAC 7:14A-2.5(2).

Type of Enforcement Action:
Directive.

Description of Violation:
Failure to submit renewal application for NJPDES permit within specified time.

Resolution of Violation:
Renewal application was submitted on August 17, 1988.

C. Date of Action:
July 27, 1988

Section of Law or Statue Violated:
Unspecified violation of NJPDES permit.

Type of Enforcement Action:
Directive.

Description of Violation:
"A discharge with a source that could not be identified was found and was flowing at the time of the inspection."

Resolution of Violation:
The discharge was identified and stopped. The Department of Environmental Protection was so notified on August 17, 1988.

D. Date of Action:
April 29, 1988

Section of Law or Statue Violated:
NJAC 7:14A-2.5(2).

Type of Enforcement Action:
Directive.

Description of Violation:
Failure to submit renewal application for NJPDES permit within specified time.

Resolution of Violation:
Renewal application was submitted on August 17, 1988.

E. Date of Action:
April 29, 1988

Section of Law or Statue Violated:
NJAC 7:14A-2.5a(9)iv.

Type of Enforcement Action:
Directive.

Description of Violation:
Failure to sample and file monitoring reports.

Resolution of Violation:
Sampling was completed as directed. Samples were taken on July 26, 1988. Results were submitted on August 17, 1988.

F. Date of Action:
April 29, 1988

Section of Law or Statue Violated:
Unspecified violation of NJPDES permit.

Type of Enforcement Action:
Directive.

Description of Violation:
"The facility has an unpermitted discharge of non-contact cooling water overflow."

Resolution of Violation:
The discharge was eliminated at the time of inspection on March 22, 1988, and this was reported to the Department on June 15, 1988.

G. Date of Action:
May 13, 1987

Section of Law or Statue Violated:
Unspecified violation of NJPDES permit.

Type of Enforcement Action:
Directive.

Description of Violation:
"Housekeeping throughout the facility is in need of improvement."

Resolution of Violation:
Housekeeping was and continues to be improved.

H. Date of Action:
May 13, 1987

Section of Law or Statue Violated:
Unspecified violation of NJPDES permit.

Type of Enforcement Action:
Directive.

Description of Violation:
Unpermitted discharge from wash sink in mixing room to storm drains.

Resolution of Violation:
The wash sink was disconnected and is no longer in use. This elimination of discharge was reported to the Department on June 4, 1987.

I. Date of Action:
May 13, 1987

Section of Law or Statue Violated:
Unspecified violation of NJPDES permit.

Type of Enforcement Action:
Directive.

Description of Violation:
Failure of facility to have copy of NJPDES permit on site at time of inspection.

Resolution of Violation:
A copy of the NJPDES permit was placed in the office on site. This correction was reported to the Department on June 4, 1987.

J. Date of Action:
June 30, 1986

Section of Law or Statue Violated:
NJAC 7:14A-2.5a(9)iv.

Type of Enforcement Action:
Directive.

Description of Violation:
Failure to sample and file monitoring reports.

Resolution of Violation:
In a letter of June 4, 1987, from J. H. Crow Company, Inc., to the Department we wrote:

> With reference to the NJPDES monitoring, we would appreciate it if we could meet with you on site. There is some confusion as to where samples should be taken. We would appreciate your help ...

Help from the Department was not forthcoming until our meeting on the site with Department representatives on June 15, 1988. Samples were taken on July 26, 1988, during the first storm after June 15. Results were submitted on August 17, 1988.

K. Date of Action:
March 31, 1981.

Section of Law or Statue Violated:
NJAC 7:27-8.3(a).

Type of Enforcement Action:
Notice of Prosecution with $600 penalty.

Description of Violation:
Construction, installation, or alteration of air pollution control equipment without a permit.

Resolution of Violation:
Issuance of Permit/Certificate Number 051659 was approved on July 13, 1981. A 75% rebate of the $600 penalty was granted by the Department in 1982.

L. Date of Action:
July 2, 1974

Section of Law or Statue Violated:
Unspecified violation of water pollution control regulations.

Type of Enforcement Action:
Directive from Passaic Valley Sewerage Commissioners.

Description of Violation:
Discharge of boiler blowdown into river causing pollution.

Resolution of Violation:
Boiler blowdown separator was installed, and wastewater was discharged into sanitary sewer. The installation was inspected on August 27, 1974. The inspector reported that it eliminated the violation.

ATTACHMENT 4

Site Map

SCALE 1:24 000

1 MILE
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS MEAN LOW WATER
THE RELATIONSHIP BETWEEN THE TWO DATUMS IS VARIABLE
SHORELINE SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER
THE MEAN RANGE OF TIDE IS APPROXIMATELY 4.2 FEET IN THE HUDSON RIVER
AND 5.1 FEET IN THE HACKENSACK AND PASSAIC RIVERS

ROAD CLASSIFICATION

Heavy-duty ——— Light-duty ———
Medium-duty ——— Unimproved dirt - - - - - -
Interstate Route U. S. Route State Route

QUADRANGLE LOCATION

WEEHAWKEN, N. J—N. Y.

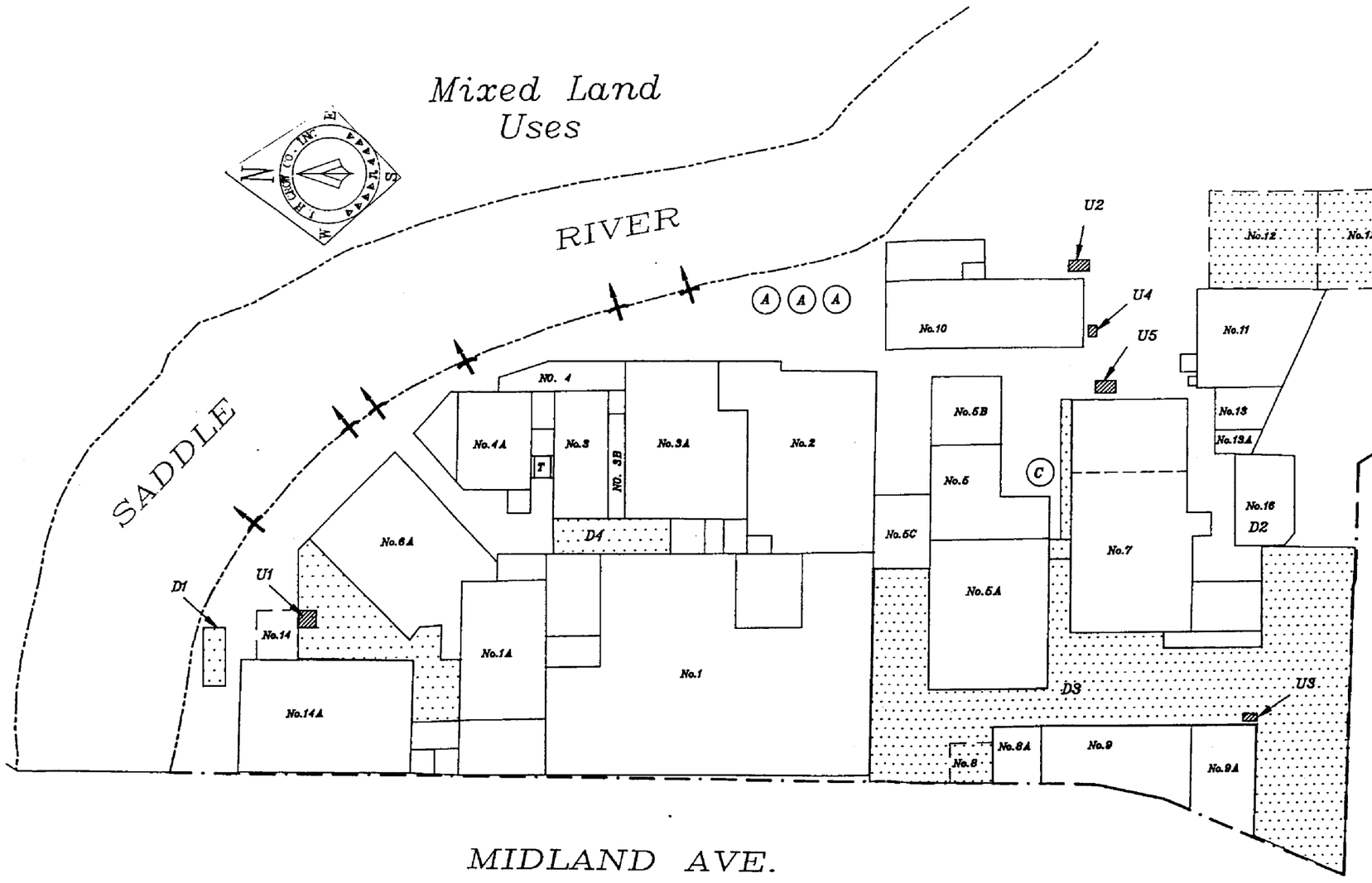
N4045—W7400/7.5

Revisions shown in purple compiled from aerial photographs taken 1976 and other sources. This information not field checked. Map edited 1981

1967
PHOTOREVISED 1981
DMA 6165 I SE-SERIES V822

GARFIELD MOLDING
WALLINGTON, NEW JERSEY
LOCATION OF SITE
J. H. CROW CO., INC. - PORT MURRAY, NJ

JAG000221
TIERRA-B-015886



Key

- Approximate Property Boundary
- Former Building
- Watercourse
- Pipe
- A = Cyclone dust collector
- C = Cistern
- D = Drum storage area
- Paved Area
- T = Transformer
- U = Underground Tank

0 100

Scale feet

ATTACHMENT 4

GARFIELD MOLDING
Wallington, N.J. 07057
SITE LAYOUT
J. H. CROW CO., INC. - PORT MURRAY, NJ

Attachment 4A

Garfield Molding Company, Inc.
ECRA Case 88439
Site Evaluation Submission
Attachment 4A

Usage of Buildings on Site

Bldg. No.	Present Use	From	To	Hazmat Use?	Historic Use	From	To	Hazmat Use?
1	Molding (press) & office & finishing	1908	1988	Yes	Press dept. & office & finishing rm.	1908	1988	Yes
1A	Mixing & blending rm.	191?	1988	Yes	Mixing dept. & blending rm.; laboratory	191?	19??	Yes
2	Finishing; drill presses & grinders	1918	1988	Yes	Finishing dept.	1918	1988	Yes
3	Mold storage vault	1920?	1988	No	Mold storage vault	1920?	1988	No
3A	Oven dept. (baking & high humidity)	1920	1988	Yes	Power house	19??	1920	Yes
3B	Mold storage annex	19??	1988	No	Mold storage annex	19??	1988	No
4	Boiler not in use	19??	1988	Yes	Hemit building	19??	19??	Yes
4A	Impregnation building	19??	1988	Yes	Impregnation building	19??	1988	Yes
5	Pipe shop	19??	1988	No	Pipe shop	19??	1988	No
5A	Power house (oil to 1981, gas with oil-standby to 1986, gas to 1988)	1957	1988	Yes	Power house	1957	1988	Yes
5B	Not in use	1957	1988	Yes	Boiler house (coal)	19??	1957	Yes
5C	Receiving & shipping (loading dock)	19??	1988	Yes				
6A	Storage of left-over asbestos	1983	1988	Yes	Mixing dept.	19??	19??	Yes
7	Direct mail advertising service	19??	1988	No	Shipping, receiving & inspection dept.	19??	1961	Yes
8	Building demolished	19??	1988	No	Gate house, clock house & switch room	19??	19??	No
8A	Storage of thermoset compounds	19??	1988	Yes	Transformers	19??	1949	Yes
9	Storage of thermoset compounds	19??	1988	Yes	Executive carriage house, then garage & lunch room	19??	19??	No
9A	Not in use	19??	1988	No	Laboratory	192?	193?	Yes
10	Automotive repair shop	19??	1988	Yes	Repair dept.	19??	19??	Yes
11	Vehicle parking	1957	1988	No	Coal storage	19??	1957	Yes
12	Building demolished; vehicle parking	19??	1988	No	Storage shed	19??	19??	Yes
12A	Building demolished; vehicle parking	19??	1988	No	Storage shed	19??	19??	Yes
13	Pipe storage	19??	1988	No	Steel storage	19??	1988	No
13A	Electrical motor storage	19??	1988	No	Motor room	19??	1988	No
14	Building demolished	19??	1988	No	Die shop, tool crib & locker room	19??	19??	Yes
14A	Tool & die shop; injection molding; heat treatment; toilet	19??	1988	Yes	Die shop	19??	1988	Yes Yes
16	Drum storage	19??	1988	Yes	Box shop	19??	19??	No
17	Sewer pump house	1918?	1988	No	Sewer pump house	1918?	1988	No

Hazmat Use? = Storage or usage of materials containing hazardous substances?

ATTACHMENT 5

Description of Operations

A detailed description of all current and, to the extent available from diligent inquiry, all past operations and processes occurring at the industrial establishment designed to guide the Department step-by-step through plant operations, with particular emphasis on areas of the process stream where hazardous substances and wastes are or were generated, manufactured, refined, transported, treated, stored, handled or disposed, at the industrial establishment above and below ground. [NJAC 7:26B-3.2(c)5.]

Present Operations

The Garfield Molding Company is engaged in the molding of insulating parts for the electrical industry. Parts are made by cold molding, thermal transfer molding, or injection molding. These are all thermoset methods. Thermosetting materials are heated at some point in processing to give the material rigidity and strength.

In the cold molding process, solid components are blended, mixed with water, molded under pressure at ambient temperature, dried, and baked. The major ingredients are cement, clay, and fibrous materials. Prior to 1983, asbestos was used as a fiber fill. In 1983 the use of asbestos was discontinued in favor of wollastonite. The resultant product is an electrically

insulating ceramic which is then surface-finished by grinding and sand-blasting. The finished pieces may be dipped in paraffin for moisture protection.

In the thermal transfer process, granular molding compounds are first formed into tablets roughly resembling hockey pucks. The tabletted material is then forced into a mold under heat and pressure. Alternatively, the granular compounds are molded directly in a screw-driven injection press. The molding compounds are commercial premixes containing resins. (Resins are polymeric materials.) The premixes may also contain fiberglass, and/or various additives. Premixes currently in use are as follows:

Alkyd molding compounds

Base resins (homopolymers)

Melamine-formaldehyde resin

Melamine-phenol formaldehyde polymeric molding compounds

Phenol formaldehyde polymeric molding compounds

Polyester/alkyd polymeric molding compounds

Polyester molding compounds (styrene based)

Polyester molding compounds (vinyl toluene based)

Urea-formaldehyde molding compounds

Building locations are shown on the site plan in Attachment 4. The present and historic usage of buildings is tabulated in Attachment 4A. Raw materials are received at the loading dock

(5C). From there, they are distributed to the various locations where the materials are used. Buildings 8A and 9 are used for storage of raw materials.

The Building 1, 1A complex is the oldest part of the facility. Mixing of the ingredients for cold molding occurs in 1A. Building 1 houses the presses for the cold molding, injection molding, and thermal transfer molding operations.

Drying and baking of cold molded parts, or their curing in a high humidity room, occurs in Building 3A. Surface finishing is done in Building 2. Cold molded pieces are impregnated with hot paraffin in Building 4A.

Building 14A contains the tool and die shop. The building 5, 5A, 5B complex is the power house. Molds are stored in Building 3. Metal pipes are stored in Building 13. Electric motors are stored in Building 13A. Building 16 is used for drum storage. Building 11, a former coal storage area, is now roofless, and used for vehicle parking. Building 17 is the sewage pump house.

The remaining two buildings are rented to other establishments. Building 10 houses an automotive repair shop, and in Building 7 there is a bulk-mailing operation.

Three cyclone dust collectors are located at the rear of the property. These collectors service areas in the plant where dust may be generated.

Past Operations

Prior to 1945 cold molding was employed exclusively. In the early part of the century some molding materials were polymerized on site. Raw materials used included fish oil, toluene, and tars, or bitumen, such as uintaite. Furfural and formaldehyde have been used on site, but not in recent years. Tars and vegetable waxes were used to impregnate molded pieces. Prior to 1983, asbestos was used as a fiber fill.

In the past, the second story of Building 6A was employed for the storage of raw materials. These materials were then discharged from hoppers on the second floor to mixing vessels on the ground floor. This building housed the mixing process for the cold molding operation. Asbestos was handled in this building. Former uses of other buildings are given in Attachment 4A.

ATTACHMENT 7A

Summary of Industrial Establishment Wastewater Discharges of Sanitary and/or Industrial Waste

Attachment 7A

Garfield Molding Company, Inc.
ECRA Case 88439
Site Evaluation Submission
Attachment 7A

Wastewater Discharges:

Discharge Period From	To	Discharge Type	Discharge To	Treatment By
1918?	Present	Sanitary wastewater	Bergen County Utilities Authority treatment works	Public treatment works
1918?	Present	Non-contact cooling water	Bergen County Utilities Authority treatment works	Public treatment works
1918?	Present	Boiler blowdown wastewater	Bergen County Utilities Authority treatment works	Public treatment works
1988	Present	Humidity room condensate	Bergen County Utilities Authority treatment works	Public treatment works
1908	Present	Stormwater	Saddle River, and Passaic River	Environment
1960	1988	Humidity room condensate	Saddle River	Environment
?	1987	Wastewater from wash sink in mixing room	Saddle River	Environment
?	1981	Non-contact cooling water	Saddle River	Environment
1969	1974	Boiler blowdown wastewater	Saddle River	Environment
1908	1918?	Sanitary wastewater	Saddle River or Passaic River	Environment

JA5000279

ATTACHMENT 8

Hazardous Substance and Waste Containment Description

A description of the types, ages, dimension and locations of containers, tanks, surface impoundments, landfills, septic systems or any other structure, vessel, contrivance or unit that contain or previously contained hazardous substances and wastes. [NJAC 7:26B-3.2(c)8.]

Attachment 8

Garfield Molding Company, Inc.
ECRA Case #88439
Site Evaluation Submission
Attachment 8

Hazardous Substance and Waste Containment Description:

Type of Storage Unit	Date Installed	Area or Units Volumetric Capacity	Material Stored	Construction Type	Location Reference	Decommissioning or Sampling Reference
Underground tank	1928	1,000 gal.	Mineral spirits	Steel	U1	U1
Underground tank	1960	1,000 gal.	Gasoline	Steel	U2	U2
Underground tank	1943	500 gal.	Gasoline	Steel	U3	U3
Underground tank	1968	250 gal.	Waste oil	Steel	U4	U4
Underground tank	1958	10,000 gal.	Fuel oil, no. 2	Steel	U5	U5
Drum storage	?	? sq. ft.	Furfural & isopropanol	Concrete pad	D1	D1
Drum storage	?	? sq. ft.	Miscellaneous wastes	Old building with concrete floor	D2	D2
Drum storage	?	? sq. ft.	Hydraulic oil	Outdoor paved area	D3	D3
Drum storage	?	? sq. ft.	?	Outdoor paved area	D4	D4

ATTACHMENT 9

Hazardous Substance/Waste Inventory

A completed and current inventory, description and location of hazardous substances and wastes generated, manufactured, refined, transported, treated, stored, handled or disposed at the industrial establishment above and below ground, and a description of the location, types and quantities of hazardous substances and wastes that will remain subsequent to the transfer or sale of the industrial establishment. [NJAC 7:26B-3.2(c)9.]

Attachment 9

Garfield Molding Company, Inc.
ECRA Case 88439
Site Evaluation Submission
Attachment 9

Hazardous Substance Inventory:

Trade Name	Material Name	Inv. Amt. Sep-88	Unit	Location Building No.	Storage Method Container Type	Size	Typical Annual Usage	Unit	To Remain on Site
Acetylene	Acetylene	1	lbs.	5	Cylinder		2	cyl.	No
Ammonia	Ammonia	?	gal.	?	Bottle	1/2 gal.	<10	gal.	No
Beetle Molding Cpds.	Urea-formaldehyde molding compound	500	lbs.	1	Barrel	250 lbs.	8,000	lbs.	No
Cutting oils	Cutting oils	?	lbs.	?	?	?	?	lbs.	No
Cyglas Molding Compounds	Polyester molding compound (vinyl toluene based)	0	lbs.	1	Carton	60 lbs.	1,500	lbs.	No
Durez 000118	Phenol formaldehyde polymeric molding compound	0	lbs.	9	Bag	50 lbs.	10,000	lbs.	No
Durez 000123	Phenol formaldehyde polymeric molding compound	1,000	lbs.	9	Bag	50 lbs.	40,000	lbs.	No
Durez 000152	Phenol formaldehyde polymeric molding compound	0	lbs.	9	Bag	50 lbs.	10,000	lbs.	No
Durez 000153	Phenol formaldehyde polymeric molding compound	0	lbs.	9	Bag	50 lbs.	6,000	lbs.	No
Durez 022257	Phenol formaldehyde polymeric molding compound	0	lbs.	9	Bag	50 lbs.	3,000	lbs.	No
Durez 029237	Phenol formaldehyde polymeric molding compound	600	lbs.	9	Bag	50 lbs.	3,000	lbs.	No
Fibercore Molding Compounds	Polyester molding compounds	200	lbs.	1	Carton	50 lbs.	4,000	lbs.	No
FM-3510 Black Phenolic Preforms	Phenol formaldehyde polymeric molding compound	50	lbs.	1	Carton	50 lbs.	1,000	lbs.	No
FM-5064 Black Phenolic Preforms	Phenol formaldehyde polymeric molding compound	50	lbs.	1	Carton	50 lbs.	100	lbs.	No
Fuel oil	Fuel oil	?	gal.	U5	Tank	10000 gal.	2,000	gal.	No
Gasoline	Gasoline	0	gal.	?	Can	5 gal.	?	gal.	No
Gearco SAE 80W90	Lubricant	5	gal.	5	Pail		50	gal.	No
Group I PLENCO, 02308 Black	Phenol formaldehyde polymeric molding compound	0	lbs.	1	Bag	50 lbs.	10,000	lbs.	No
Group I PLENCO, 04300 Black	Phenol formaldehyde polymeric molding compound	50	lbs.	9	Bag	50 lbs.	1,000	lbs.	No
Group I PLENCO, 04527 Black	Phenol formaldehyde polymeric molding compound	0	lbs.	1	Bag	50 lbs.	400	lbs.	No
Group I PLENCO, 07507 Black	Phenol formaldehyde polymeric molding compound	50	lbs.	1	Bag	50 lbs.	600	lbs.	No
Group III PLENCO	Melamine-phenol formaldehyde polymeric molding cpd.	0	lbs.	1	Drum	50 lbs.	200	lbs.	No
Hydraulic fluid	Hydraulic fluid	200	gal.	5	Tank	?	3,000	gal.	No
Isopropanol	Isopropanol	75	gal.	6	Drum	55 gal.	300	gal.	No
Lubricants	Lubricants	?	lbs.	?	?	?	?	lbs.	No
Mineral Spirits	Mineral spirits	55	gal.	6	Drum	55 gal.	150	gal.	No
Plaskon Reinforced Alkyd	Reinforced alkyd molding compound	10	lbs.	1	Carton	50 lbs.	400	lbs.	No
Premi-Glas	Glass reinforced unsaturated polyester molding cpd.	50	lbs.	?	Carton	50 lbs.	50	lbs.	No
Randac 1894 EX-L	Hydrocarbon waxes in solvent	100	lbs.	1	Pail	50 lbs.	200	lbs.	No
Valox Resin	Base resins (homopolymers)	31,000	lbs.	9, 4A	Drum	1000 lbs.	0	lbs.	No
Yield Aerosol	Aliphatic petroleum distillate	12	oz.	14A	Can	12 oz.	24	cans	No

IA0002233

ANNUAL REPORT

by

Chief Engineer

S. A. LUBETKIN

to the

PASSAIC VALLEY

SEWERAGE COMMISSIONERS

FOR OPERATIONS DURING

THE YEAR

1974

Violation and Elimination - Garfield Manufacturing Company, 10 Midland Avenue, Wallington, N. J. 07057
June 6 - August 24, 1974 (F. Cupo)

On June 6, 1974, Inspector Cupo made an inspection of this company. He discovered that one of four active pipes was covered with debris, making it impossible to sample. Two others were discharging and were sampled, and the fourth was a 2-inch boiler blowdown pipe which discharged at 7:00 A.M. for a short time. Also, there were three other visible, but inactive, pipes. The samples of the two cooling water discharges were satisfactory, but the boiler blowdown was polluting, and Inspector Cupo so informed Mr. J. Minaberry, Vice President, Mr. Lombardi, Plant Manager, and Mr. LaRose Jr., Safety Manager. He also told them they must uncover the outlet which was inaccessable to him so that he might sample the discharge. Mr. Cupo reported that they would comply with PVSC directions and that they intended to make corrections to the boiler blowdown about July 15, 1974, when the plant was shut down for vacation.

On July 2, 1974, Mr. Lubetkin wrote to this company confirming that their boiler blowdown was polluting, and directing them to make accessable the covered outlet. Mr. Lubetkin also informed them that they must have a NPDES permit from the USEPA in order to discharge into the Passaic River.

Although no reply was received by PVSC, Inspector Cupo reported that he had questioned Mr. Bauer, a Vice-President, on July 22, and was told that the equipment delivery was causing the installation delay. He gave Inspector Cupo a copy of the report on a new Fulton Blowdown Separator, dated July 19, 1974, from the Fulton Boiler Works of Pulaski, New York.

On August 24, 1974, Mr. LaRose informed Inspector Cupo that the work was completed. On August 27, 1974 at 2:00 P.M., Mr. Cupo inspected the work and reported that the boiler blowdown installation was completed and is now being discharged through a separator, into the sanitary sewer, thus eliminating this violation.

Inspector Cupo also reported that the #3 outlet was now uncovered and it was sampled by him. Analysis showed the discharge satisfactory. Inspector Cupo reported that Mr. Bauer informed him that they had applied for a NPDES permit.

Industrial Site Evaluation Element
Bureau of Environmental Evaluation and Cleanup Responsibility Assessment
Environmental Cleanup Responsibility Act

Report of Inspection

ECRA Case #88439 Date of Inspection: 6/1/89
Inspection Category: Preliminary
Inspector: Bryan Moore

Industrial Establishment: Garfield Molding Co., Inc.

Location: 10 Midland Avenue
Wallington Boro, Bergen County

Individuals Involved: Mr. Bruce Bauer, Garfield Molding
Mr. Joseph Dolan, Garfield Molding
Ms. Anne Kruger, J.H. Crow
Mr. John Crow, J.H Crow

NARRATIVE DESCRIPTION

I arrived on site at 1:50pm and conducted a complete inspection of the facility. Operations on site include molding plastic and other materials for the electrical industry. Processes utilized on site include cold molding, thermal transfer molding, or injection molding. In the cold molding process, solid components are blended, mixed with water, molded into the desired product, dried and then baked. Major ingredients include cement, clay, and fibrous materials. Prior to 1983, asbestos was used as the fiber fill in this process. The end product is an electrically insulating ceramic which is surface-finished by grinding and sandblasting. Various premixes containing resins and other additives are used in the operations.

In the past, stormwater, humidity room condensate, wastewater from slop sink, non-contact cooling water, boiler blowdown, and sanitary wastewater were all discharged to the Saddle River. Several unpermitted discharges and other violations of the NJPDES-DSW have occurred during the historical operations.

The proposed sampling plan identifies eight potentials areas of environmental concern:

1. Three cyclone dust collectors and their associated dust piles.
2. A cistern which received non-contact cooling water and compressor blowdown.
3. Several exterior drum storage areas
4. Asbestos within the building
5. Several refuse piles
6. Several areas of surficial staining
7. Transformers
8. Five underground storage tanks.

I discussed my findings in an exit interview and departed the site at 3:55pm.

DEFICIENCIES NOTED

1. A preliminary review of the proposed sampling plan has found the proposed sampling unacceptable to address the areas of environmental concern. Composite sampling is not acceptable to this Department.

2. Several unpermitted discharges and other violations of the existing NJPDES-DSW permit have occurred during the historical operations of the facility.

3. It has been indicated that past industrial practices at the facility have included spreading waste oil on the unpaved driveways in an effort to control dust.

4. Historically, coal was used as the primary fuel source to heat the buildings. No further information has been provided.

5. Much of the machinery utilized on site is situated within concrete pits located inside the buildings. These pits were observed to contain lubricating oils. Drainage from these pits enters a concrete trough which ultimately empties into a common concrete sump.

6. Information addressing the plumbing/drainage system within the buildings has not been provided.

7. A suspected vent pipe was observed outside along Building #5 in the area of the cistern. It is unknown whether an additional underground storage tank is or was present in this area.

8. Aerial photos have not been provided to document past industrial practices at the site.

9. A concrete trench was observed along side of Building 5A. The trench was observed to be stained with an oily residue. This trench discharges to a catch basin located in the shipping/receiving area.

10. Within a small courtyard located between Building 14A and Building 1A, there was a pit covered with a steel plate and a discharge of a grayish dust which has impacted the soils within the area.

11. A catch basin was observed between Building 4A and Building 1A. This area has historically been used for drum storage.

12. A concrete pad was observed adjacent to the cyclone dust collectors.

13. A covered concrete pit was noted in the vicinity of Building 4 adjacent to the Saddle River.

14. Overhead pipes were observed between Building 2 and Building 5B and also between Building 5B and Building 7. The insulation covering these pipes was deteriorated.

15. A concrete pad was located along the southside of Building 5B.

16. Empty drums were stored outside of the former coal storage area (Building 11) and along the southwest corner of Building 16.

17. The floor of Building 16 was heavily soiled. A portion of the roof is missing which has allowed rain water to reach the floor.

18. A six-inch diameter pipe was observed along the southside of Building 7. Apparently this pipe extends down to the water table.

19. Two covered pits were observed in the area of the cistern; one located outside of the doors on the southside of Building 5 and the other located immediately adjacent to the cistern.

ACTIONS REQUIRED ON THE PART OF THE APPLICANT

1. A revised Sampling Plan, which meets all criteria of N.J.A.C 7:26B-3.2(c)11, shall be submitted to this Department within thirty (30) days of receipt of this letter and shall address all areas of concern at the site.

The recommended sampling to address the areas of environmental concern previously identified in the Sampling Plan shall be as follows:

a. Discrete soil samples of the dust piles shall be taken to identify the contaminants of concern. All of the dust piles shall be removed for proper disposal and the underlying soils shall be sampled for the contaminants of concern.
b. At a minimum, one sediment and one aqueous sample shall be taken from the cistern and four soil borings shall be completed within one foot of the cistern. Discrete soil samples from the borings shall be collected based upon the construction details of the cistern.
   It is also possible that a NJPDES-DGW permit will be required to address past industrial discharges to this cistern.
c. A minimum of four discrete samples (one from each side) should be taken within one foot of eachdrum storage pad and analyzed for the contaminants of concern.
d. A complete decommissioning/decontamination plan shall be developed for all interior areas and submitted to the Department for review.
e. The refuse piles located on site shall be addressed as in (a) above.
f. If the source of the surficial staining identified on site has been well documented, the visibly stained soils shall be removed for proper disposal and post-excavation samples shall be collected for the contaminants of concern to confirm the cleanup.

g. A minimum of four soil samples (one from each side) shall be collected within one foot of each transformer pad. All samples shall be analyzed for PHC and PCB.

h. If inactive, the five underground tanks shall be excavated along with any visibly contaminated soils and post-excavation samples shall be taken for the contaminants of concern.

2. Additional information, including materials discharged and their ultimate discharge point(s), shall be provided for all historical unpermitted discharges. All discharges to the environment shall be addressed in the revised Sampling Plan.

3. All areas where this practice was historically practiced shall be shown on a scaled site map and shall be addressed in the revised Sampling Plan.

4. Additional information, including past disposal practices of the coal ash, shall be provided in the revised Sampling Plan.

5. The oil collection system shall be described in detail and all trenching and sumps shall be visually inspection. Photodocumentation to this effect shall be provided. If the integrity of this system has been compromised, sampling shall be proposed in the revised Sampling Plan.

6. All floor drains, slop sinks, non-contact cooling water systems, etc. including their discharge points shall be shown on a scaled site map.

7. The suspected vent pipe shall be traced. If an additional underground tank is located in this area, it shall be addressed in the revised Sampling Plan.

8. Historical aerial photos shall be provided.

9. The source of the oily residue shall be determined and the integrity of the trench and catch basin documented. If its integrity has been compromised or the catch basin discharges to the environment, it shall be addressed in the revised Sampling Plan.

10. The origin of this grayish dust shall be provided and the historical use of the covered pit shall be documented. If appropriate, sampling in this area shall be proposed.

11. A sediment sample shall be collected from this catch basin and analyzed for the contaminants of concern. All sediment from the catch basin shall be removed for proper disposal and its integrity visually inspected.

12. The historical use of this concrete pad shall be provided.

13. The historical use of this pit shall be provided.

14. A sample of this insulation shall be collected and analyzed for asbestos.

15. The historical use of this concrete pad shall be provided.

16. These areas shall be addressed in the revised Sampling Plan.

17. At a minimum, the floor of this building shall be cleaned and all washwater, residue, etc. shall be drummed for proper disposal.

18. Historical use of this pipe shall be fully documented.

19. Historical use of these two pits shall be fully documented and information on the construction details of these pits shall be provided.

ACTIONS REQUIRED ON THE PART OF BEECRA

1. Once submitted, review information and prepare an appropriate response.

Inspector/Case Manager Signature Bryan Moore

Approved: Lois Arbegast, Supervisor
Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment

Form HWM-004
3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
5th Fl., 401 E. State St., Trenton, N.J. 08625

NOTICE OF VIOLATION

ID NO. NJD001270263 DATE 9/21/89

NAME OF FACILITY Garfield Molding Company Inc.

LOCATION OF FACILITY 10 Midland Ave, Wallington, N.J. 07057

NAME OF OPERATOR Mr Bruce Bauer - President

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following 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 and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-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.S.A. 58: 23:11(c) Facility did discharge hazardous substance (motor oil) into soil which could impact waterways of State of N.J. N.J.S.A. 23:11(e) Facility failed to notify N.J.D.E.P. as to such release

Remedial action to correct these violations must be initiated immediately and be completed by 10/2/89. 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 $25,000 per violation.

Daniel J. Bungaro
Investigator, Division of Waste Management
Department of Environmental Protection

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

FEB 14 2006

GENERAL NOTICE LETTER
URGENT LEGAL MATTER
PROMPT REPLY NECESSARY
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Charles Murray, President
Garfield Molding Company, Inc.
10 Midland Avenue
Wallington, NJ 07057

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

Dear Mr. Murray:

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 area of study to include the entire Lower Passaic River and its tributaries from Dundee Dam to Newark Bay ("Lower Passaic River Study Area").

By this letter, EPA is notifying the Garfield Molding Company, Inc. 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 and operators 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.

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 Restoration 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. The study is being conducted pursuant to CERCLA and WRDA.

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were released from Garfield Molding Company's facility located at 10 Midland Avenue in Wallington, New Jersey, into the Lower Passaic River Study Area. 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, the Garfield Molding Company 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.

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at the Site may be substantially limited. If you believe, and can document, that you fall within that category, please inform Ms. Reddy and Mr. Hyatt in writing at the addresses identified in this letter. You will be asked to submit financial records including federal income tax returns as well as audited financial statements to substantiate such a claim.

Please note that, because EPA has a potential claim against you, you must include EPA as a creditor if you file for bankruptcy. You are also requested to preserve and retain any documents now in your Company's or its agents' possession or control, that relate in any manner to your facility or the Site or to the liability of any person under CERCLA for response actions or response costs at or in connection with the facility or the Site, regardless of any corporate document retention policy to the contrary.

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 Lower Passaic River Study Area. 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 may be forwarded to all parties on this list as well as to the Natural Resource Trustees.

We request that you become a "cooperating party" for the Lower Passaic River Restoration Project. As a cooperating party, you, along with many other such parties, will be expected to fund the CERCLA study. 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.

You may become a cooperating party by participating in the Cooperating Parties Group ("Group") that has already formed to fund the CERCLA study portion of the Lower Passaic River Restoration Project.

We strongly encourage you to contact the Group to discuss your participation. You may do so by contacting:

William H. Hyatt, Esq.
Common Counsel for the Lower Passaic River Study Area Cooperating Parties Group
Kirkpatrick & Lockhart LLP
One Newark Center, 10th Floor
Newark, New Jersey 07102
(973) 848-4045
whyatt@kl.com

Written notification should be provided to EPA and Mr. Hyatt documenting your intention to join the Group and settle with EPA no later than 30 calendar days from your receipt of this letter. The result of any agreement between EPA and your Company as part of the Group will need to be memorialized in an Administrative Order on Consent. EPA's written notification should be mailed to:

Kedari Reddy, Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway - 17th Floor
New York, New York 10007-1866

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 along with the Site file are located at EPA's Region 2 office located at 290 Broadway, New York, NY on the 18th floor. You may call the Records Center at (212) 637-4308 to make an appointment to view the administrative record and/or the Site file for the Diamond Alkali Site, Passaic River.

As you may be aware, the Superfund Small Business Liability Relief and Brownfields Revitalization Act became effective on January 11, 2002. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at http://www.epa.gov/swerosps/bf/sblrbra.htm and review EPA guidances regarding these exemptions at http://www.epa.gov/compliance/resources/policies/cleanup/superfund.

Inquiries by counsel or inquiries of a legal nature should be directed to Ms. Reddy at (212) 637-3106. Questions of a technical nature should be directed to Elizabeth Butler, Remedial Project Manager, at (212) 637-4396.

Sincerely yours,

R. Basso

Ray Basso, Strategic Integration Manager
Emergency and Remedial Response Division

Enclosure