August 22, 1979

City of Elizabeth City Hall Elizabeth, N.J.

()

Attn: Mr. Victor Vinegra

Dear Mr. Vinegra:

On August 14, 1979, Grab samples were taken from two manholes at the Phelps Dodge Copper Products Company, 720 S. Front Street, Elizabeth.

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Sampling was done at one-half hour intervals from 8:45 A.M. to 10:45 A.M. The samples were fixed in the field with nitric acid and were stored at 4°C. Sample points were:

> No. 1 - Manhole located in the intersection of South Front St., and Bayway Ave.

No. 2 - Manhole located inside of Phelps Dodge's fence on South Front St., adjacent to the truck scale.

Samples were tested for copper using procedures outlined in Standard Methods for the Examination of Water and Wastewater, 14th edition, with the following results in mg/1:

Sample . Time	No. 1	No. 2
0845	24.4	51.2
0915	21.2	36.8
0945	26.4	68.4
1015	14.4	22.8
1045	29.6	51.2

DGE000005

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On August 16, 1979, an automatic water sampler was installed in the manhole on Phelps Dodge's property adjacent to the truck scale. Samples were taken for a twanty-four hour period at half-hour intervals. Results of the analyses for copper were as follows:

Sample time	Copper mg/l	Sample time	Copper mg/l
0945	73.6	2145	148.0
1045	165.6	22.45	79.6
1145	76.8	2345	83.6
1245	53.2	2445	119.6
1345	56.8	0145	160.8
1445	85.6	0245	91.6
1545	13.2	0345	104.0
1645	82.8	0445	92.4
1745	96.4	0545	57.6
1845	84.0	0645	28.0
1945	94.4	0745	75.6

On August 20, 1979, large amounts of floating oil entered the Joint Meeting Treatment Plant at the influent from the Elizabeth Pumping Station. A Joint Meeting inspection crew traced the source of the oil to the Phelps Dodge Copper Products Co. Since a strike was in progress at Phelps Dodge, no attempt was made to enter the plant. Dr. Fred Bauder attempted to contact Mr. Kurt Behrsin, of Phelps Dodge who was not available at the time.

On August 21, 1979, a second incidence of oil occurred at the treatment plant. The inspection crew entered the Phelps Dodge property at approximately 2:30 P.M. and observed that the floating oil was indeed coming from the factory in such quantity as to cover the waste stream with a thick coating. Mr. Behrsin was contacted and shown the oil. He admitted that the oil was coming from Phelps Dodge. He stated that he would try to find the source of the oil and stop it. Follow-up investigations are scheduled by the Joint Meeting Enforcement group.

These investigations clearly indicate that the Phelps Dodge Copper Products Company continues to be in violation of the City of Elizabeth Ordinance number 1059 with respect to copper concentration in its plant effluent.



continued

In addition, the above Ordinance states that no floating oil is allowed to be discharged into a city sewer without permission of the City Engineer. Phelps Dodge is likewise in violation of this section of the Ordinance.

These continued violations must be stopped at once so as not to have further detrimental effects on our treatment facility. We would appreciate your cooperation in notifying Phelps Dodge of their continued violations and plans for cessation of same.

We will continue to monitor the effluent at Phelps Dodge and will keep you informed of any further developments. If you have any questions, please do not hesitate to contact us.

Very truly yours,

Michael J. Brinker, Jr. Executive Director

MJB:sg cc: George J. Minish, Esq. e : :

MAINTENANCE

IN THE MATTER OF AN OUTLET SEWER AND TREATMENT PLANT FOR CERTAIN MUNICIPALITIES IN EFSEX AND UNION COUNTIES

BOO SOUTH FIRST STREET

January 8, 1980

City of Elizabeth City Hall Elizabeth, N.J. 07201

Att: Mr. Victor Vinegra, City Engineer

Re: Phelps Dodge

Dear Mr. Vinegra:

Enclosed is a copy of a memo from A. Fornwald of our office regarding the above which is self-explanatory. Regarding discharges to the sewer during a "down-time" period around Christmas suggests a leaky system as we have noted before. To this date we have not received any information from Phelps Dodge via your office regarding their efforts to "clean up" any leaks. In addition we have not received as of this date a monthly progress report for January from Phelps Dodge as was promised.

Very truly yours,

Michael J. Brinker, Jr. Executive Director

MJB:sg Enc. cc: George J. Minish, Esq. Allen S. Fornwald

DGE000007

TO: Michael J. Brinker, Jr.

FROM: Allen S. Fornwald RE: Phelps Dodge DATE: January 3, 1980

> As part of our continuing effort to monitor Phelps Dodge, automatic water samplers were placed at the Phelps Dodge effluent line adjacent to their truck scale from December 17 to 18, 1979, and from December 26-27, 1979. Twenty-four samples were taken on each occasion. The plant was closed on December 26-27. For the December 17-18 sampling, every other sample was tested for total copper. For the December 26-27 sampling, every fourth sample was tested for total copper.

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The	results were as	follows:	Results are in	mg/1.
12/17/79 TIME	COPPER CONC.		12/26/79 TIME	COPPER CONC.
0900 1100 1300 1500 1700 1900 2100 2300 0100 0300 0500 0700	16.0 14.4 44.0 30.4 28.0 55.2 67.2 22.8 4.0 17.6 6.4 12.0		0900 1300 1700 2100 0100 0500	4.8 5.6 27.6 12.0 9.6 13.2
MAX. AVG. MIN.	67.2 26.5 4.0			27.6 12.1 4.8

The samples taken on December 26, 1979, were also tested for dissolved copper. The results in mg/l were as follows:

TIME	DISSOLVED	COPPER
0900 1300 1700 2100 0100 0500	1.6 4.4 27.6 9.0 5.6 8.2	
MAX. AVG. MIN.	27.6 9.4 1.6	

Phelps Dodge continues to be in violation of the Elizabeth Sever Ordinance. The data from December 26-27, while the plant was closed, suggest a leaky system. If this is the case, perhaps a large part of Phelps Dodges' problem could be resolved by proper maintenance and mood housekeeping. This is not a new suggestion. We have informed Phelps Dodge of this many times over the past years.

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We will continue to monitor Phelps Dodges' discharge on a routine basis and will keep you apprised of further developments.

Allen S. Fornwald

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ASF:jj

JOINT MEETING

MAINTENANCE

IN THE MATTER OF AN OUTLET SEWER AND TREATMENT PLANT FOR CERTAIN MUNICIPALITIES IN ESSEX AND UNION COUNTIES

SOO SOUTH FIRST STREET

To: Michael J. Brinker, Jr. From: Allen S. Fornwald Re: Phelps Dodge Date: November 4, 1980

Samples of Phelps Dodge effluent were taken from the sampling point adjacent to the truck scale from October 20-21, 1980. A composite sample was tested for heavy metals and several grab samples were tested for copper. The results, in mg/l are as follows:

Sample	<u>Cadmium</u>	Chromium	Copper	Nickel	Lead	Zinc
Composite	0.20	2.08	0.92	0.12	0,20	8.0
0.930			1.12			
1330			1.40			
1830			1.04			
2030			1.80			

These results indicate a significant decrease in copper in Phelps Dodges' effluent.

However, the results also show a substantial amount of Zinc in Phelps Dodges' effluent.

We cannot conclude that Phelps Dodge has solved its copper problem based on one sampling, but the results are promising.

We will continue to monitor Phelps Dodge for copper and zinc.

I will keep you informed of the results of our investigation.

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JOINT MEETING

MAINTENANCE

IN THE MATTER OF AN OUTLET BEWER AND TREATMENT PLANT FOR CERTAIN MUNICIPALITIES IN ESSEX AND UNION COUNTIES

SOO BOUTH FIRST STREET

March 23, 1981

Phelps Dodge Copper Products Co. 720 South Front Street Elizabeth, N.J. 07202

15 ·

Attn: Mr. K.R. Behrsin

Dear Sir:

The following is our laboratory analysis of a composite sample of your plant effluent taken from March 9 to 10, 1981.

The results are in mg/l unless otherwise noted.

pH 6.30 Standard Units	Total	Cadmium	0.04
Temperature 20° C	Total	Chromium	0.15
Total Organic Carbon 60	Total	Copper	31.70
Biochemical Oxygen Demand 15	Total	Nickel	0.08
Total Suspended Solids 130	Total	Lead	0.10
	Total	Zinc	0.15

Our analysis continued high levels of copper in your effluent.

Please advise us of the current status of your efforts to remove the copper from your effluent.

Very truly yours,

DGEUGUOC9

Állen Ś. Fornwald, Chief Officer, Industrial Surveillance & Pretreatment

TIERRA-B-016634

ASF:jj cc: Victor Vinegra, City Eng.



October 25, 1988

Phelps Dodge Copper Products Company P. O. Box 648 Elizabeth, New Jersey 07207

Attention: Mr. Thomas Wilson

Dear Mr. Wilson:

On August 31, 1988 there was a spill of sulfuric acid into the pretreatment system. This was noticed by Phelps Dodge personnel at approximately 7:30 a.m. on September 1, 1988. The discharge at sample location 02 was stopped and Joint Meeting was notified. We happened to have samplers installed at the time that the spill occured. Individual pH readings of the sample bottles indicated that the spill occured at approximately 4:45 p.m. on August 31, 1988. Phelps Dodge estimates that approximately 500 gallons of 10% sulfuric acid solution was discharged.

Enclosed please find data tabulations for samples of your plant effluent taken August 31 - September 2, 1988.

The data indicates that your plant effluent was in violation for the following:

Sample Location 01		
8/31 - 9/01/88		Total Copper
9/01 - 2/88		Total Copper
8/31/88		Oil and Grease
9/01/88	-	Oil and Grease

Sample Location 02 8/31/88 (1145-1615) - Total Copper 8/31 - 9/1/88 - Total Copper, Total Cadmium 9/01 - 2/88 - Total Copper, Total Cadmium 8/31/88 (1145) - 0il and Grease 9/01/88 (1137) - 0il and Grease (No Discharge) 8/31/88 (1145-1415) - pH 8/31 - 9/01/88 (1645-0715) - pH 9/1-2/88 (0745-0737)- pH (No Discharge) 9/2/88 (0737-1017) - pH

Please be advised that this letter serves as formal notice of the violations that occured during the hours of discharge.

DGE000016

Since 1898 a partnership of East Orange of Hillside or Irvington of Maplewood or Millburn or Newark or Roselle Park or South Orange or Summit or Union and West Orange. Also serving Elizabeth or Livingston or Orange and New Providence with Wastewater Treatment Facilities.

PHELPS DODGE COPPER PRODUCTS 48-94 BAYWAY AVENUE, ELIZABETH

• • •	SAMPLE LOCATION 01	
Sample Date	8/31-9/1/88	9/1-2/88
Sample Time	1130-1100	1204-1134
Sample Type	Composite	Composite
рН (S.U.)	6.35	6.55
Temperature (C)	26	27
BOD	23	NA
TSS	78	NA
Total Cadmium	0.093	0.080
Total Chromium	0.098	0.075
Total Copper	7.12*	7.60*
Total Nickel	0.067	0.038
Total Lead	0.056	0.102
Total Zinc	0.444	0.085
Total Silver	0.049	0.014

Asterisk (*) denotes a violation of facility's Permit



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PHELPS DODGE COPPER PRODUCTS 48-94 BAYWAY AVENUE, ELIZABETH

 $(\widehat{f}_{1},\widehat{f}_{2},\widehat{f}_{3})$

SAMPLE LOCATION 02

Sample Date	8/31-9/1/88	8/31/88	8/31-9/1/88	9/1/88	9/1/88	9/1-2/88
Sample Time	1145-1115	1145-1615	1645-1115	1045-1115	1137-1407	1137-1107
Sample Type	Composite	Composite	Composite	Composite	Composite	Composite
pH (S.U.)		See At	tached Table	for pH Data-		
Total Cadmium	3.37*	0.151	4.40*	8.05*	10.8*	1.65*
Total Chromium	0.174	0.016	0.230	0.417	0.526	0.125
Total Copper	368*	12.6*	485*	911*	1200*	165*
Total Nickel	0.224	0.044	0.196	0.327	0.476	0.214
Total Lead	0.432	0.208	0.557	0.791	1.03	0.936
lotal Zinc	0.270	0.058	0.324	0.523	0.643	0.290
Total Silver	. 0.065	0.015	0.024	0.029	0.054	0.014

NOTE: Asterisk (*) denotes a violation of the facility's Permit.

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HELPS DODGE COPPER PRODUCTS 48-94 BAYWAY AVENUE, ELIZABETH

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SAMPLE LOCATION 02

DATE	<u>TIME</u> p	H	DATE	TIME	рн	•
8/31/88	1145	10.00	9/1/88	1137	2.20*	ľ
8/31/88	1145-1215	9.46*	9/1/88	1137-1207	2.0*	
8/31/88	1245-1315	9.64*	9/1/88	1237-1307	1.9*	
8/31/88	1345-1415	9.70*	9/1/88	1337-1407	2.1*	
8/31/88	1445-1515	8.73	9/1/88	1437-1507	12.0*	
8/31/88	1545-1615	6.26	9/1/88	1537-1607	12.5*	
8/31/88	1645-1715	3.08*	9/1/88	1637-1707	12.6*	
8/31/88	1745-1815	2.81*	9/1/88	1737-1807	12.7*	
8/31/88	1845-1915	2.71*	9/1/88	1837-1907	12.5*	· · .
8/31/88	1945-2015	2.63*	9/1/88	1937-2007	12.6*	v -
8/31/88	2045-2115	2.59*	9/1/88	2037-2107	12.6*	5
8/31/88	2145-2215	2.54*	9/1/88	2137-2207	12.6*	זי
8/31/88	2245-2315	2.50*	9/1/88	2237-2307	12.7*	C C
8/31-9/1/88	2340-0015	2.46*	9/1-2/88	2337-0007	12.6*	ی'. ر
9/1/88	0045-0115	2.41*	9/2/88	0037-0137	12.7*	А
9/1/88	0145-0215	2.37*	9/2/88	0137-0237	12.7*	0
9/1/88	0245-0315	2.33*	9/2/88	0237-0337	12.7*	Z
9/1/88	0345-0415	2.28*	9/2/88	0337-0437	12.7*	
9/1/88	0445-0515	2.24*	9/2/88	0437-0537	12.7*	
9/1/88	0545-0615	2.21*	9/2/88	0537-0637	12.7*	
9/1/88	0645-0715	2.17**	9/2/88	0637-0737	12.7*	
9/1/88	0745-0815	2.15*	9/Ż/88	0737-0837	12.7*	
9/1/88	0845-0915	2.11*	9/2 / 88	0837-0937	12.7*	
9/1/88	0945-1015	2.10* 2.3	9/2/88	0937-1007	12.7*	
9/1/88	1045-1115	2.06*-	9/1/88	1137-1407	1.93*	
8/31-9/1/88	1145-1115	2.19*	9/1-2/88	1137-1007	12.58*	
			9/2/88	1017	12.0*	

Asterisk (*) denotes a violation of the facility's Permit

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PHELPS DODGE MAGNET WIRE COMPANY 48-94 Bayway Ave., Elizabeth

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COMPLIANCE SCHEDULE #3

Completion Date 12/12/88	Task <u>Description</u> Seal sewers F1, F2, F3, F4, E5, E4, E3, E2, A1, B1, 200 Accumulator, K3, Extrusion Holes, N, L	Report Due 12/26/88
1/3/89	a) Cease overflow to sewer from Oakite rinse tank-evaporate (no discharge) b) Housekeeping around machines, equipment, Hoffman, 13 Die Vaughn, etc. (no residue to sewer)	1/17/89 🗸
1/20/89	Installation of filter press to be completed and in full operation	2/3/89 / 2/2
1/30/89	Construction steam cleaning area	2/13/89 2/17
2/13/89	Installation of new pumps and heat exchanger for pickle tanks $Delayec^{C}$	2/27/89 4/21/8 9
2/15/89	Cleaning of the entire sewer system to be completed	3/1/89
3/1/89	Compliance with Joint Meeting Regulations and the Categorical Standards for 40 CFR Part 468	3/15/89 ~ 3/2
****	Final Compliance Report	5/30/89



July 23, 1990

Phelps Dodge Magnet Wire 48-94 Bayway Avenue Elizabeth, New Jersey 07207

Attention: Mr. Thomas Wilson

Re: Notice of Violation

Dear Mr. Wilson:

i:

The following is a tabulation of the laboratory data for samples taken at sample points 01 and 02 on June 14-15, 1990. The results are expressed as milligrams per liter unless otherwise noted. Asterisk (*) denotes a violation of the Non-Domestic Wastewater Discharge Permit (Permit).

Sample Location	01	01	02	02	02
Sample Date	6/14-15/90	6/14/90	6/14-15/90	6/14/90	6/15/90
Sample Time	0940-0910	0940	0950-0920	0950	0832
Sample Type	Comp	Grab	Сотр	Grab	Grab
pH (S.U.)	NA	6.60	NA	11.80 *	11.40 *
Temperature (°C)	NA	25	NA	27	NA
Total Cadmium	0.022	NA	0.051	NA	NA
Total Chromium	0.011	NA	0.063	NA	NA
Total Copper	0.582	NA	3.19 *	NA	NA
Total Nickel	0.036	NA	0.049	NA	NA
Total Lead	0.125	NA	0.218	NA	NA
Total Zinc	0.168	NA	0.049	NA	NA
Total Silver	0.004	NA	0.026	NA	NA
Oil/Grease	NA	35 *	NA	31 *	NA

Please note that your facility was in violation of the Permit for the following:

Location 02	
Copper	6/14-15/90
pH	6/14/90
PH	6/14/90
011/Greas	se 6/14/90
Oil/Greas	se 6/15/90

Since 1898 a partnership of East Orange - Hillside - Irvington - Maplewood - Millburn - Newark - Roselle Park - South Orange - Summit - Union and West Orange. Also serving Elizabeth - Livingston - Orange and New Providence with Wastewater Treatment Facilities.



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Please be advised that this letter serves as formal notice of the above violations.

Please notify this office, in writing, no later than August 1, 1990 of the status of the pretreatment system.

If you have any questions or require any further information regarding this matter, please do not hesitate to contact us.

Sincerely,

Carry J. Pull

Cathy L. Pullizzi Coordinator Industrial Pretreatment

CLP:hl

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ec: Marc Anthony Vaida, Esq.

E. Marticorena, Elizabeth Engineer

J. Regenthal, Phelps Dodge

J. Saleh, Phelps Dodge

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MEMORANDUM

TO: Phelps Dodge File FROM: Cathy L. Pullizzi(JP) SUBJ: 1990 Phelps Dodge Violations - Sample Location 01 DATE: January 7, 1991

The following is a tabulation of the violations occuring at sample location 01 @ Phelps Dodge during 1990.

VIOLATIONS

<u>Copper Violations</u>		
Sample Date	<u>Copper (mg/l)</u>	TRC
3/14-15/90	1.75	Yes
9/4-5/90	1.58	Yes
9/5-6/90	1.32	Yes
9/6-7/90	1.65	Yes
11/15-16/90	1.87	Yes
12/5-6/90	1.43	Yes
12/19-20/90	2.26	Yes

Phelps Dodge was in violation of the Permit 33.3% of the time during 1990.

Significant Non-Compliance - Phelps Dodge meets the criteria for SNC due to the TRC violations (during a 6-month period 33% or more of the samples exceed the daily maximum limit by more than the TRC). During the time span of July -December 1990, 16 samples were taken. Phelps Dodge was in violation of the TRC on 6 occasions.

	<u>Oil/Grease Viola</u>	ions	
	Sample Date	<u>Oil/Grease (mg/l)</u>	TRC
	10/29/90	170	Yes
	10/30/90	150	Yes
	Phelps Dodge was	in violation of the Permit	11.8% of the
time	during 1990.		

Accidental Discharge

On May 26, 1990, Phelps Dodge discharged approximately 700 gallons of 10% sulfuric acid. The discharge occured when equipment failure caused a process tank in the pickling operation to overflow. The spill was reported (verbally & in writing) in the required time period. The JM Influent pH meter alarms did not go off (set to alarm @ 5.0 and 9.0). No treatment plant upsets were noted.

DGE000022

Since 1898 a partnership of East Orange = Hillside = Irvington = Maptewood = Millburn = Newark = Roselle Park = South Orange = Summit = Union and West Orange. Also serving Etzabeth : Uvingston = Orange and New Providence with Wastewater Treatment Facilities. Phelps Dodge (1/7/91 memo)

Late Report Violations

One report was submitted late (due 8/1/90 and received 8/2/90).

Failure to Submit Report Violations

Three reports have not been received to date. These are as follows:

<u>JM Letter</u>	Report/Response Due
11/2/90	11/16/90
11/6/90	11/19/90
12/3/90	12/15/90
F 1 1 1 1	

Significant Non-Compliance

The failure to provide reports within 30 days from the due date is considered to be SNC.

SUMMARY

1

Although Phelps Dodge did accomplish the recycling of their process wastewater and thereby achieve zero-discharge at sample location 02, they continue to remain in violation of the Joint Meeting Limitations for copper at sample location 01, and occasionaly violate for oil/grease at point 01. In addition, Phelps Dodge has not submitted three reports.

Phelps Dodge has achieved Significant Non-Compliance status as a result of copper violations and failure to submit reports.

It is extremely important that the copper be reduced to acceptable limits. The JM sludge cannot be classified as Class B due to the copper concentration and the petroleum hydrocarbon concentration in the sludge.

RECOMMENDATION

It is recommended that enforcement action be initiated against Phelps Dodge.

JOINT MEETING 500 South First Street Elizabeth, NJ 07202

201-353-1313

FAX 201-353-7925

Date: 1/7/90 Ruy Papperman To: From: Cathy Pullizzi

This transmission consists of 3 pages, this being page no. 1

Comments: Ray - here's a synopsis of Phelps Dodge-I recommend that we take action. What do you think ?

Cothy

Plups Dodg-

UVCLAS

JU MEP

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POLHER ONE AND FINAL. MINOR HYDROLIC FLUIDN PHELPS LUDGE COPPEN PRODUCT CO. EDICABETHN M.J. CUTPN N.Y. REPORT NUMBER CO1-75

1. STIUATION

A. IS09000 AUG 75 RECEIVED-REPUBL OF AN OIL SPILL AT THE PHELPS DOUGE COPPER PHODUCTS CO. IN ELICABETAN N.J. FROM A MA. LE WODAIS

THE PLANT ENGINEES.

B. AMOUNT SO GALLONS OF HYDROLIC FLUID

C. CAUSE OVERFLUE IN GIL WATER SEPERATOR SYSTEM DUE TO AN UNDSUALLY, LARGE AMOUNT OF WATER ENTERING THE SYSTEM CAUSING THE OIL AT THE TOP TO OVERFLOW AND ENTERED A STORM DRAIN WHICH ENTER THE ARTHUR XILL

PAGE TWO RUEDEEA0004 UNCLAS

2. ACTION TAKEN

A. 1810509 AUG 75 PS3 HAPKA AND HUS JURNSON ON SCENE

B. HALMATS OBSERVED 20-30 GALLONS OF OIL IN WATER CONTAINED BY BOOM. APPHOXIMATELY 5 GALLONS OF OIL WAS OBSERVED OUTSIDE OF BOOM TRAILING DOWN THE ARTHUR KILL WITH THE OUT GOING TIDE. C. COASTAL SERVICES CLEAN OF COMPANY WAS ON SCENE CONDUCTING

CLEANOP

STATED TRAT AT APPROXIMATELY OBSOQ AN UNUSUAL AMOUNT OF WATER ENTERED THE OIL WATER SEPERATOR SYSTEM CAUSING THE OIL AT THE TOP TO SISE

MAPIDLY AND OVERFLOW INTO A STORM DHAIN. THE WATER LEVEL WAS GUICKLY LOWERED AT THE OVERFLOW STOPPEDY THEY COASTAL SERVICES

SAS CALLED IN. 5. 11459 HAZMATS DEPARTED SCENE

DGE000030



PRINCETON AQUA SCIENCE 789 JERSEY AVENUE . NEW BRUNSWICK, NEW JERSEY 08002 . TELEPHONE (201) 840-8800

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April 2, 1979

Mr. John Conniff Phelps Dodge Copper Products Company 8ayway and South Front Streets Elizabeth, New Jersey 07207

Re: Industrial Waste Samples, P.O. BP49987

Dear Mr. Conniff:

Your samples received on March 9, 1979 have been analyzed. The results are on the enclosed table.

All determinations were done in accordance with <u>Standard Methods</u>, 14th Edition (1975). If there are any questions, please feel free to contact me.

An invoice is enclosed for the analytical work.

Very truly yours,

PRINCETON AQUA SCIENCE

Educa G. alinea Edna A. Alinea

Laboratory Manager

EAA:dls Enclosure

PAS #5101

DGE000032

TIERRA-B-016647

WATER ANALYSIS DATA SHE	ET
CompanyPhelps Dodge Copper Products Company	Job # 5101
	Date April 2, 1979
Address Bayway and South Front Street	RP 49987
City Elizabeth State NJ - Zip 07207	Invoice 4790
Construction of the second sec	Sample
To Attn. of: Mr. John Conniff	

REPORT OF ANALYSIS

	Main Sewer Water 3/8/79	Secondary Sewer Water 3/8/79
	Milligram	s/liter
рН	9.2	7.0
Turbidity, NTU	58	180
Total Solids	1102	236
Total Volatile Solids	168	78
Total Mineral Solids	934	158
Suspended Solids	228	110
Suspended Volatile Solids	106	74
Suspended Mineral Solids	122	36
011 & Grease - Floatable	69	82
- Emulsified	90	100
Chlorides	25	32
COD	371	260
BOD	39	29
Cadmium	0.014	0.020
Chromium, Irivalent	<0.05	<0.05
Chromium, Hexavalent	<0.01	<0.01
Leag	<0.03	0.000
mercury	0.002	<0.001
Lopper .	24.0	0.24
	<0.03	<u.ud 0.062</u.ud
NICKE!	<0.023	0.003
Cuanida	~0.0025	0.13
Arconir	-0.01	-0.01
Phonale	<u>ລ.006</u>	0.004
Chiorinated Hydrocarbons	ci).02	.0.02
VIIIVI IIIACCE IIJEI OCUI DUIIS		

Edna A. Alinea, Laboratory Manager

PRINCETON AQUA SCIENCE

789 JERSEY AVENUE . NEW BRUNSWICK, NEW JERSEY 08902 . TELEPHONE (201) 848-8600

PHELPS DODGE COPPER PRODUCTS CO.

Analysis of Samples Received 3/16/77

	Sample Number		
AParameter	Ø1 (Main)	#2 Secondary	
pN (units)	9.6	6.8	
Turbidity (J.T.U.)	130	240	
Total Solids	997	291	
Total Volatile Solids	113	168	
Total Mineral	884	123	
Suspended Solids	155	119	
Suspended Volatile	108	111	
Suspended Mineral	47	8	
011 & Grease			
Floatable Oils	22.5	49	
Emulsified Oils	66.6	67	
Chlorides	30	20	
Chemical Oxygen Demand	344	8240	
Biochemical Oxygen Demand	93	1700	
Cadium	0.04	0.07	
Chromium (Trivalent)	0.0	0.11	
Chromium (Hexavalent)	0.0	0.04	
Lecd	0.4	C. 4	
Mercury	0.0136	0.0063	
Copper	13.9	0.97	
Venedium	0.0	0.0	
Nickel	0.2	0.11	
Zinc	.53	.43	
Cyanide	0.0	9.0	
Argenic	¢\$0.001	0.012	
Chlorinated Hydrocarbons	a#0.001	0.001	
Phenols	A&0.002	v.093	

#All results expressed as mg/l except where noted. ##Less Than

We certify this to be the true results from the analysis of the above samples Celivered to our laborstory on March 16, 1917, Amelysis parformed in accordance with Standard Methods, 14th Edition (1975).

(Bernard Obersky Laboratory Supervisoz Princeton Aque Science

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PRINCETON AQUA SCIENCE

789 Jersey Avenue • P.O. Box 151 • New Brunswick, New Jersey 08902 • Telephone (201) 840-8800

Harch 17, 1982

Mr. K.R. Behrsin Phelps Dodge Copper Products, Co. P.O. Box 648 Elizabeth, New Jersey 07207

Dear Mr. Behrsin:

Analysis of the wastewater samples from the main and secondary sewers collected March 2, 1982 has been completed. The results are presented in the attached table. An invoice for the analysis will follow.

The determinations were performed in accordance with Standard Methods 15th Edition (1980).

If you have any questions please feel free to contact me.

Very truly yours,

PRINCETON AQUA SCIENCE

Cola Corolla

John Cirello, Ph.D., P.E. Vice President

JC/mjs Enclosure

#5101

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Consulting Environmental Scientists & Engineers

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REPORT OF ANALYSIS

	Main Sewer (mg/l)	Secondary Sewer (mg/1)
pH (unit) Turbidity	6.7 150 260	6.1 853 1,800
Total Volatile Solids Total Mineral Solids Total Suspended Solids	118 152 32	1,300 467 660
Total Suspended Volatile Solids Total Suspended Mineral Solids Oil and Grease (Floatable)	16 16 *	410 250 7,150
Oil and Grease (Emulsified) Chlorides	73.4 38.5 256	9,290 21.0 2,720
80D Cadmium	22 0.008 <0.017	186 0.462 <0.017
Chromium (Hexavalent) Lead	<0.017 0.040 <0.001	0.214 0.289 <9.002
mercury Copper Vanadium	0.403 <0.150 <0.012	20.0 <0.150 0.182
NICKEI		

Zip_07207	BP 62328 1069 #: Date:3/2/82
T OF ANALYSIS	
Main Sewer (mg/1)	Secondary Sewer (mg/1)
0.028 0.011 <0.001	3.08 0.020 <0.001
0.009 <0.010 180	0.0013 <0.010 160
s according to Standar	d Methods procedure.
	Date: Auth.: Lot #: Invoice Sample D T OF ANALYSIS Main Sewer (mg/1) 0.028 0.011 <0.001 0.009 <0.010 180 s according to Standar

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RARITAN BAT PROJECT

Phelps Dedge Copper Products Corporation

INDUSTRIAL WASTES SURVEI H

I WAR STUTY OF THE TOTAL

1: Date of Meeting: January 4, 1966 2. Personnel Participating:

The following is a list of men participating in this conference, grouped by organization represented.

Phelps Dodge Copper Products Corporation

Mr. L. F. Buckman, Division Manager Mr. Robert Gigl, Works Manager Mr. Howard Stout, Technical Director Mr. Franklin Lange, Plant Engineer

Federal Water Pollution Control Administration

Raritan Bay Project

Mr. Richard T. Dewling, Chief, Operations Mr. Douglas Brackney, Supervisory Sanitary Engineer

3. Purpose:

This meeting was scheduled by a letter from Mr. Paul De Falco, Jr., Raritan Bay Project Director, directed to Mr. L. F. Buckman, Division Manager, Phelps Dodge Copper Products Corporation, Elizabeth, New Jersey. The purpose of this meeting was to discuss process wastes created by operation of this facility as it relates to Arthur Kill and Raritan Bay pollution.

GENERAL INFORMATION

4. Organization:

The Phelps Dodge Copper Products Corporation Plant is located at the eastern edge of Elizabeth, New Jersey, between the Arthur Xill and the New Jersey Turnpike. This facility presently employs approximately 950 people. The company's main executive and operating offices are located at 300 Park Avenue, New York City.

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Ser ka - TOTO CONTRACTOR OF THE PARTY OF THE Participation of the second 4.2 Products:

This plant produces essentially copper products in the following form: form

2 1 . Kata Manha Prairie to

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Hot rolled rods Dram wire, bare and tinned Flat wire and bus bar Stranded wire and the second and Pipe, tube, drawn rods and shapes

6. Rev Materials:

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Principal raw materials include:

Copper Tin Lead Zinc Nickel Non-ferrous metals Cable seal compound

For the most part, bulk copper bar is brought in by barge. Small quantities of this metal are brought in by truck and rail. All other raw materials are brought in by truck.

7. Capacity:

The capacity of this plan, is repo. .d to be more than one million pounds of copper per day. The conjuny does not wish to reveal exact capacities.

8. Operations:

Borr on Basically, this plant operates on a 16 hour, five day per week basis."""

Principal operations are cutlined below:

Hot Rolling - Wire bars or alloy billets are heated in a suitable furnace to 1,300 - 1,600°F; hot worked by forming rolls to a suitable. useable or marketable copper rod; and then furnished black or cleaned by pickling in a sulfuric acid solution and rinsed. Approximately 2,000 to 3,000 gpm of recirculated fresh cooling water is used in the process. Temperature of the cooling water, depending upon the time of the year, is 90 to 110°F. This process operates on a five day, two shift basis.

Billet Casting -- Copper scrap or ingot copper is melted in an induction type furnace. The melt is cast into water cooled molds forming

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billets. Recirculated fresh water 18 used for mold cooling at a rate of a supproximately 1,500 gpm. The temperature varies, depending upon the time of year, from about 90 to 120°F. The casting anop usually operates on a one shift, five day per week basis.

Extrusion Mill -Copper or alloyed billets are heated in a mutable furnace to a temperature of 1,300 - 1,700°F; discharged into the container of a 2,200 ton hydraulic extrusion press, and with a plunger attached to the hydraulic ram, forced through a suitable die for the forming of rod, tube, shell, or any regular or irregular shape that is presently extrudable. Occasionally a small amount of fresh water is used for quenching the finished product. The finished stock is pickled and cleaned before passing to other operations. The extrusion department usually operates on a one shift, five day per week basis.

NA SA

7 Å. 7 Å. Wire Drawing - Clean rod is passed through various types of machines which will cold reduce the cross section through dies. This cold work hardens the wire. In the reducing process it is necessary to anneal (re-soften) the wire when it becomes too hard for further reduction. The wire drawing machines have recirculating systems of drawing compounds which are generally soluble in water. These solutions are recirculated and only changed in cases of emergency. Wire is drawn in many sizes from drawn rod. These products are sold as is, or sent to other departments for further processing. The wire mills operate on a two shift, five day per week basis.

Cold Rolling - Cleaned wire from the wire mill or cleaned rectangles from the extrusion presses are cold reduced by mechanically working them through rolls which reduce this size. This size reduction also increases the hardness, and thus annealing may be needed, depending on the size and temper of the required material. These cold reducing flats are finished in all sizes and are sent out in rolls, colls, or cut to straight lengths as required by the customer. The volling mills operate on a two shift, five day per week basis.

Tinning This is a process for coating copper wire with tin or tin alloy. It is accomplished by passing the wire through a fluxing tank; through a molten tin bath at approximately 850°F; through a series of wipes to remove the excess tin and form a smooth coat; through cooling water; and then wound on take-up reels.

> This material is either shipped direct to the customer or else used elsewhere in the plant for further processing. This department usually operates two shifts, five days per week.

<u>Stranding</u> - This process merely mechanically twists small wire into cable to make the flexible equivalent of solid wire or bus bar. This material is either sold as is, or sent for further processing (insulating) elsewhere. This department normally operates two shifts, five days per week.

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Tube and Shape Drawing - Here, material from the attraction presses is mechanically reduced in size by pulling it through dies on draw benches. This drawing and rolling hardens the material, and depending upon the number of reductions and the physical characteristics required in processing, annealing may be necessary. The finished material from the draw benches may require mechanical straightening and hydrostatic testing. This department would normally operate on a one shift, five day per week basis.

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9. Vater Supply:

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Two sources of water are available, namely Arthur Kill and the municipal supply from the city of Elizabeth. Fresh water is used for drinking and sanitary purposes, and for makeup water in recirculating cooling systems used in the hot rolling, billet casting, tinning and cold rolling processes. Shall quantities are also occasionally used for quenching in the extrusion mill process. Approximately 5,500 gallons per day of fresh water are used by this installation.

Salt water from the Arthur Kill is used for cooling at a rate of 1.3 mgd. Two separate systems, one with a capacity of 500 gpm and the other 1,000 gpm are in use. The smaller quantity of salt water is pumped through copper coils for cooling the drawing solutions and for minor cooling throughout the plant. This water is used on a once through basis before being discharged to the city sever system. The remainder of the salt water, used in jacketed condensors for cooling process water in the hot rolling process, is discharged back to the Kill. This again is on a once through basis.

10. Severage:

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Approximately 25 percen: of the installation's sanitary wastes go to the city sever, while the remainder discharge directly to the Arthur Kill through any one of six : evers.

Principal Processes:

Principal processes at this plant are hot rolling, billet casting, extrusion, wire drawing, cold rolling, tinning, stranding, and tube and shape drawing.

12. Waste Treatment:

This plant of the Phelps Dodge Corporation provides no ireatment of its industrial or domestic wastes. At the present time, there are six discharges going directly into the Arthur Kill. Outlined below is a brief description of the discharges into each sever.

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Billet casting with NAME AND THE OWNER WITH Vite Draving 1,2,3 1,2,3,4,5,6

Tinhing Domestic vastes Demiltra AnalyElcal Results:

At the request of the Interstate Sanitary Commission, the following analyses were performed on the raw discharges:

Stat 14215

	a service and a service of the servic Service of the service of the service Service of the service	Analysis,	pro		-	
No.	Sollide, SS	011	Cu.	Ra	Flow	
	119.4 149.3	48.7 46.5	0 11.8	6.8	72.4	
	47.7 179.0	13.0 48.2	0 74.6	7.3 5.5	8.8 50.2	
5 12 1 1 5 12 1 1 6	163.2 18.7	12.1 30.1	189.1 27.6	3.0 2.5	13.0 118.2	

The above listed analyses were run on composite samples collected over an eight hour period. Flows were measured with a V-notch weir. The flow figures reported are average discharges, and therefore, could be used in computing loads. Only the of these discharge points (4,5,6) are readily accessible for sampling.

WATER POLLUTION ABATEMENT PROGRAM

On November 5, 1955, Phelps Dodge received a letter from the Inter-State Sanitary Commission, advising them to set up an abatement program gapanets on the following basis: Diversion of all sewage to the city sewer system; consideration of a closed circulation system, or some other means to eliminate oil and fine copper solids from being discharged to the Arthur Kill; removal of all floating and settleable solids; and elimination of any precipitant which might form in the Arthur Kill as a direct result of any and the plant's discharges. The deadline set by I.S.C. for this abatement program is September, 1967.

On the basis of this request the plant has already taken steps to eliminate the discharge of domestic sevage, by moving to another location, their locker and toilet facilities. In addition, all recirculating systems which provide wash and cooling water for the rod mills are being extended and improved. Other inplant modifications designed

4/27/66

the kill are he the quantities of wastes being discharged being ulschargen to the milly stafe. a far interes of a 24. 2 8 Sel 9 1 Time was devoted to a discussion of collution parameters for study intil smithly Wastes are discharged to the city of ver, and industrial wastes eliminated. [Examination of the discharges should be made for, but not necessarily be limited to, the following: Oil BOD, COD, DO,

Chlorides mand copper - Testing for oll is recommended because soluble oils are used in drawing operations.

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SUPPLEMENTAL INFORMATION AND SUPPARIT It is apparent from the foregoing that considerable thought has been given to principal wastes sources at this plant. The Phelps Dodge Copper Products Corporation is to be commended for the inplant modifications already completed and for its future abatement program. The continuous collection of effluent data, however, are essential in documenting this and other implant improvements in order to demonstrate progress.

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JOINT MEETING of ESSEX AND UNION COUNTIES 500 South First Street Elizabeth, NJ 07202

NON-DOMESTIC WASTEWATER DISCHARGE PERMIT APPLICATION

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, . N	lote:	Please read all attached instr application. Please type or p	uctions prior to co rint.	ompleting this
SI	ECTION	A - GENERAL INFORMATION		• •
1.	. Fa	cility Name: PHELPS DODGE	SPECIALTY COPPER	PRODUCTS CO.
	<u>a</u> .	Operator Name: Phelps Dod	ge Specialty Cop	per Products Co.
	b.	Is the operator identified in Yes [X] No []	l.a., the owner of	the facility?
	- -	If no, provide the name and ad the contract and/or other docu responsibility for the facilit	dress of the operatiments indicating the y.	tor and submit a copy of he operator's scope of
•				
2.	Facil Stree	ity Address: t:48-94_Bayway		
-	City:	Elizabeth	State: <u>NJ</u>	Zip: <u>0720</u> 7
3	Busin Street	ess Mailing Address: or P.O. Box: <u>PO Box 6</u>	48	
(City:	Elizabeth	State:NJ	Zip: <u>0720</u> 7
4. D) esign Attacl	ated signatory authority of th h similar information for each	e facility: authorized represe	ntative]
N	ame:	James J. Szalay		· · · · · · · · · · · · · · · · · · ·
Ti	itle:	Environmental Coordinato	r	
Ad	dress	: <u>48-94 Bayway</u>		
Ci	ty:	Elizabeth	State: NJ	Zip: <u>0720</u> 7
Pho	one ∦:	908-351-3200 ext. 223		· · · · · · · · · · · · · · · · · · ·
Des	ignat	ed facility contact:	• • •	
Nam	e:	James J. Szalay	·····	
Titl	le: <u> </u>	Cnvironmental Coordinator		· · · ·
Phon	ne #:_	908-351-3200, ext. 223		
				UGE000047

SECTION B - BUSINESS ACTIVITY

If your facility employs or will be employing processes in any of the industrial categories or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), place a check beside the category of business activity (check all that apply).

Industrial Categories*

] Aluminum Forming

- | Asbestos Manufacturing
-] Battery Manufacturing
- | Can Making
- J Carbon Black
- Coal Mining
-] Coil Coating

X Copper Forming

Electric and Electronic Components Manufacturing

Electroplating

Feedlots .

Fertilizer Manufacturing

Foundries (Metal Molding and Casting)

Glass Manufacturing

| Grain Mills

j Inorganic Chemicals

Iron and Steel

| Leather Tanning and Finishing

| Metal Finishing

) Nonferrous Metals Forming

J Nonferrous Metals Manufacturing

] Organic Chemicals Manufacturing

J Paint and Ink Formulating

| Paving and Roofing Manufacturing

| Pesticides Manufacturing

] Petroleum Refining

| Pharmaceutical

| Plastic and Synthetic Materials Manufacturing

Plastics Processing Manufacturing

| Porcelain Enamel

Pulp, Paper, and Fiberboard Manufacturing

Rubber

| Soap and Detergent Manufacturing

] Steam Electric

| Sugar Processing

| Textile Mills

] Timber Products

A facility with processes inclusive in these business areas may be covered by the U.S. Environmental Protection Agency's (EPA) categorical pretreatment standards. These facilities are termed "categorical users".

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SECTION C - WATER SUPPLY

		CHECK as w	any as a Is It i	re appil: Metered?	cable)		
			Yes	No			
[]	X] Public Se	apply	_X				
. (] Private	lell	·	. <u></u>			
1 I.] Surface W	later ,					
[] Other (Sp	ecify):					
2. Nan	e on the wat	er bill:	Phelps	Dodge	· · · · · · · · · · · · · · · · · · ·	· ·	· · · · · · · · · · · · · · · · · · ·
Nam	e: City of	Elizabeth	Water	and Sew	or Utili	+	
					61-06111	ty	
Stro	eet: <u>50 Win</u>	field Scott	<u>. Plaza</u>				
City	: Elizab	eth		State:	N.T	Zij	. 07201
	Water service	e account num	her:	700-09			
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ь) (d (report vo)	ume in g	gallons).	Attach 1	water bill	s. Please
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Grand Total 5,069,125

If water source is not metered, indicate below the method of determining the volume(s).

PRODUCTION POUNDS FOR 1991

January	6,327,105
February	6,372,818
March	6,708,677
April	5,745,382
Мау	4,531,829
June	4,414,173
July	2,661,005
August	5,782,470
September	2,802,160
October	2,590,173
November	2,381,941
December	1,991,637
Total	52,309,370

21 working days/month

12 months per year

52, 309,370 x $\frac{1}{12} \times \frac{1}{21}$ = 207,577 average pounds per day

-												
				NC TCO	WATE	R METER	WATER	H20	т	OTAL -	DELTA	
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12/20/1	38 164118	800467	40008	590999	786	0	34	õ	1	765516	142139	
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2/21/89) 166878	10323/0	40,000	965049	786	0	· 34	.0	1	571010	-688252	
3/20/8	168608	1294213	12158	658328	785	0	34	.0	1	473757	-97253	
4/25/89	169828	912682	42918	568556	786	0	34	0	1	383985	-89772	-
5/19/89	171038	905201	44628	531151	786	0	34	Å	1	383985	0	
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11/27/8	9 178428	994973	400,00	635885	786	0	34	0	1	533605	-44886	
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1/22/90	180988	972530	43030	568556	786	0	34	0	1	204441	-411455	
2/22/90	182388	1047340	20420	531151	786	0	34	U	1	069783	-134658	
3/23/90	183286	673290	21100	281531	786	0	34	0	-	703214	-366569	
4/23/90	184208	688252	51678	224430	786	0	34	0	1	047340	344126	
5/21/90	184848	478784	51978	249240	786	0	34	0	•	778024	-269316	
6/22/90	185848	748100	52378	233210	786	. 0	34	0		830391	52367	
7/25/90	186488	478784	52778	23210	786	0	34	0		336645	-493746	
8/24/90	187188	523670	53188	00221	786	0	34	0		608953	272308	
9/24/90	187528	254354	53298	021011	786	0	- 34	.0	. t.	A41755	432402	
10/24/9	0 188032	.377042	\$3608	231311	786	0	34	0		OSOULE	11268-	
11/26/9	0 189024	742115	54008	299240	786	0	34	0		294278	-665809	1817,883
12/24/9	189904	658328	54398	291759	786		34	-		C12447	329164	
1272112	190104	149520	54578	134638	795		34			020163	306721	
2/26/91	1 90644	403974	54858	209460	796		34			007948	-112215	. 179,667
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125/91	192194	561075	55618	246873	700		34			112215	-697229) QT	
5122171	192954	568556	55940	240888	700 201		34			112213	353103) Rd	988,788
2124131	192054	74810	55990	37405	700		34			463310	-188521	
5/20/ 11	193654	448860	56012	16458	700		. 34			2/6/3/	-29924	- 417
1120131	193954	224430	56082	52367	100		34-			246813	-44886) at	5321001
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10123131	194568	127177	56338	74810	186		34			1286/3	0	
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17/7//91	193178	11,010									6 175	
12/24/9	194/28	0		0				ં વ ે વૈધા	$\Lambda = 2$	5,06	4,125	

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BASIS OF AVERAGE GPD WATER USAGE

Restructured: New Business Plan initiated on August 1, 1991

- (A) Work force cut by 60%
- (B) Departments and machines eliminated
- (C) Water usage radically reduced

Working days:

August 199122 working days + 1 working weekend =24 daysSeptember 199121 working days + 1 working weekend =23 daysOctober 199123 working days + 1 working weekend =25 daysNovember 199121 working days + 1 working weekend =23 daysDecember 199122 working days + 1 working weekend =24 daysTotal=119 days

Based on attached water bills:

Water consumption for August - December 1991 = 1,056,317 gallons

Average GPD = $\frac{1,056,317}{119}$ = 8,877

= 9,000 GPD

SECTION C (CONT'D)

List average water usage on premises: [New facilities may estimate] 4.

Туре	Indicate Average Water Usage (GPD)	Indicate Estimated (E) or Measured (M)	Discharge Location Sanitary (San) Storm (St)
			•
a. contact cooring water	0		No
b. Non-contact cooling water	2,000	E	Discharge_
	1 000		No
c. Boiler feed	1,000	<u> </u>	_Discharge
d Process	4,000	Е	NO Discharge
	• .		Combined
e. Sanitary	2,000	E	Sewer
	0	• •••	
r. Air pollution control	<u> </u>	£i	· · · ·
g. Contained in product	0	· · · · · · · · · · · · · · · · · · ·	·
h. Plant and equipment washdown	0		
i Invigation and lawn watering	0		. •
1. IIIgation and Iawa watering			
j. Other	0	<u> </u>	
	•		
	9 000		

k. Total of A-J ,

SECTION D - SEWER INFORMATION

1. a. For an existing business:

Is the building presently connected to the public sanitary sewer system?

[X] Yes

- [] No: Have you applied for a sanitary sewer hookup? [] Yes [] No
- b. For a new business:

(i). Will you be occupying an existing vacant building (such as in an industrial park)?[] Yes [] No

(ii). Have you applied for a building permit if a new facility will be constructed? [] Yes [] No

(iii). Will you be connected to the public sanitary sewer system?
[] Yes [] No

2. List size, descriptive location, and flow of each facility sewer which connects to the sewer system. (Attach additional sheets if necessary).

		*
Sewer Size	Descriptive Location of Sewer Connection or Discharge Point	Average Flow (GPD)
24"	Plant sanitary & storm	_2,000
· . . ,		
8	<u>Alleyway along weatherproof</u> building - storm only	<u>N11, exce</u> pt storm
8"	Old boiler room and storm	<u>Nil, except</u> storm
Unknown	Main administration building sanitary/storm/laboratory	Unknown
Unknown	Weatherproof building sanitary	Unknown
Unknown	Shipping building sanitary	Unknown
Unknown	Old foremen's lockerroom sanitar	V Unknown

TIERRA-B-016667

SECTION E - WASTEWATER DISCHARGE INFORMATION

Does (or will) this facility discharge any wastewater other than from 1. restrooms to the sewer?

[X] Yes If the answer to this question is "yes", complete the remainder of the application.

- If the answer to this question is "no", skip to Section I. [] No
- Provide the following information on wastewater flow rate. Please make 2. photocopies of this page and complete for each of the discharge locations. [New facilities may estimate]
 - Hours/Day Discharged (e.g., 8 hours/day): -a'.

M 16 T 16 W 16 Th 16 F 16 SAT 8* SUN 0

Hours of Discharge (e.g., 9 a.m. to 5 p.m.): *as needed 8 AM - 4:30 PM* b.

250 GPH

5,000 GPD

2,000 GPD

M 8-12AM T 8-12AM W 8-12AM TH 8-12AM F 8-12AM SAT SUN

- c. Peak hourly flow rate (GPD)
- d. Maximum daily flow rate (GPD)
- e. Annual daily average (GPD)
- If batch discharge occurs or will occur, indicate: 3. [New facilities may estimate]

Number of batch discharges per day a. '

Average discharge per batch _____ (GPD) b.

Time of batch discharges ______ at ______ at c.

(hours of day)

____ gallons/minute Flow rate d.

e. Percent of total discharge

4. Schewatic Flow Diagram - For each major activity in which wastewater is or will be generated, draw a diagram of the flow of materials, products, water, and wastewater from the start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum daily volume of each wastestream [new facilities may estimate]. If estimates are used for flow data this must be indicated. Number each unit process having wastewater discharges to the sever. Use these numbers when showing the unit processes in the building layout in Section H. This drawing must be certified by a State Registered Professional Engineer.

See attached drawing certified by Dames & Moore showing estimated volumes.

Facilities that checked activities in question 1 of Section B are considered Categorical Industrial Users and should skip to question 6.

5. For Non-Categorical Users Only: List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each plant process. Include the reference number from the process schematic that corresponds to each process. [New facilities should provide estimates for each discharge]. Please attach additional sheets if necessary.

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
<u> </u>	<u> </u>	 	·····	······
,			·	······································
		· · · · · · · · · · · · · · · · · · ·		
	<u></u>		. <u> </u>	······
		·····	·	

ANSWER QUESTIONS 6 & 7 IF YOU ARE SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS

6. For Categorical Users: Provide the wastewater discharge flows for each of your processes or proposed processes. Include the reference number from the process schematic that corresponds to each process. [New facilities should provide estimates for each discharge]. Please attach additional sheets if necessary.

<u>No</u>	Regulated Process Pickle System Cooling System Lubricating System	Average <u>Flow (GPD)</u> <u>3.000</u> <u>200</u> <u>250</u>	Maximum <u>Flow (GPD)</u> <u>4,000</u> <u>200</u> <u>1,000</u>	Type of Discharge <u>(batch, continuous, none)</u> <u>None-recycled through</u> RO <u>None- recycled through</u> RC <u>None - evaporated</u>
No.	Unregulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge , (batch, continuous, none)
No.	Dilution Boiler Blowdown Sanitary	Average Flow (GPD) 250 2,000	Maximum Flow (CPD) 1,000 2,500	Type of Discharge (batch, continuous, none) None-evaporated continuous
	······			

7.

For Categorical Users Subject To Total Toxic Organic (TTO) Requirements: Provide the following (TTO) information.

- a. Does (or will) this facility use any of the toxic organics that are listed under the TTO standard of the applicable categorical pretreatment standards published by EPA?
 - [] Yes [X] No
- b. Has a baseline monitoring report (BMR) been submitted which contains TTO information?

[] Yes [X] No

c. Has a toxic organics management plan (TOMP) been developed?

[] Yes, (Please attach a copy)
[X] No

8. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current:	Flow Metering	[] Yes	[X] No	[]	N/A
	Sampling Equipment	[_X] Yes	[] No	[]	N/A
Planned:	Flow Metering	[] Yes	[X] No	{ . }	N/A
	Sampling Equipment	[X] Yes	[] No	[]	N/A

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

Monitoring periodically the waste stream at sample point 01 for metals, pH.

9. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Consider production processes as well as air or water pollution treatment processes that may affect the discharge.

[] Yes [X] No, (skip question 10)

10. Briefly describe these changes and their effects on the wastewater volume and characteristics: (Attach additional sheet if needed.)

11. Are any materials or water reclamation systems in use or planned?

- [X] Yes
 [] No, (skip question 12)
- 12. Briefly describe recovery process, substance recovered, percent recovered, and the concentration in the spent solution. Submit a flow diagram for each process: (Attach additional sheets if needed.)

A reverse osmosis unit is utilized to purify and recycle process.

wastewater. The RO concentrate is evaporated with the resultant

concentrate shipped to off-site permitted treatment facilities.

SECTION F - CHARACTERISTICS OF DISCHARGE

All current industrial users are required to submit monitoring data for each discharge point. <u>EACH discharge point</u> must be analyzed for all parameters listed in Tables 1 and 2 (see Appendix A). A description of each discharge point that requires sampling has been attached to your cover letter.

Analysis is to be performed by a laboratory certified in the State of New Jersey to perform wastewater analysis.

Please refer to the Instructions section for remaining instructions.

New dischargers should use the tables to indicate what pollutants will be present or are suspected to be present in proposed wastestreams.

See attached monitoring data

	In my form of unchauster treatment (see list helow) practiced at this
1.	facility?
•	Lul Yor
2.	Is any form of wastewater treatment (or change to an existing wastewater
	treatment) planned for this facility within the next three years?
	[] Yes, describe:
	[X] NO
	much the second and for treating unotowater
•	Treatment devices or processes used or proposed for treating wastewater
	or sludge (check as many as appropriate).
	[] Air Floatation
	[] Centriruge
	[A] Chlendarbian
	[] Chlorination
	y Cyclone
- 1	A) Flitration
. L r	f flow equalization type:
ľ	Crease trap
- L) Crinding filter
r	J Gilizing Iller
r i	Jon exchange
ł	X Neutralization of correction
ſ	1 Ozonation
i i	XI Reverse osmosis
i.	l Screen
ř	Sedimentation
ř	Septic tank
i.	Solvent separation
Ľ	Spill protection
ſ	l Sump
[[
[[[i Biological freatment, type:
[[[) Biological treatment, type:] Rainwater diversion or storage-
[[[[]	<pre>/ Biological treatment, type:] Rainwater diversion or storage-' / Other chemical treatment, type:</pre>
[[[[[<pre>Biological treatment, type:</pre>

•

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4. Description

Describe the pollutant loadings, flow rates, design capacity, physical size, and operating procedures of each treatment facility checked above.

Waste stream from pickle rinse is pH adjusted, sent through clarifier for precipitation, through filter press, through sand filter, through reverse osmosis with the permeate (treated water) fed to the boiler condensate makeup tank and the concentrate (containing contaminants) fed to the fluid evaporators with ultimate off-site disposal.

- 5. Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by-product disposal method, waste and by-product volumes, and design and operating conditions. See attachment - W2 CAD Drawing
- 6.

7.

Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.

None		· · · · · · · · · · · · · · · · · · ·
······································		· · · ·
<u></u>		
, <u></u> , <u>_</u> , <u></u>	· · · · · · · · · · · · · · · · · · ·	
Do you have a tre	eatment operator? [X] Yes []	No
if Yes,) Name:	James Szalay	· -
Title	: Environmental Coordinator	· · · · · · · · · · · · · · · · · · ·
Phone	908-351-3200	
Is thi	s operator licensed [] Yes {X) No
(if Ye	s,): license classification	
	license number	• • •

8. Do you have a manual on the correct operation of your treatment equipment?
 [X] Yes [] No

9. Do you have a written maintenance schedule for your treatment equipment? [X] Yes [] No

SECTION H - FACILITY OPERATIONAL CHARACTERISTICS

•

)n						
Work Days	[x] Mon.	{ X } Tues.	(X) Wed.	[X] · Thur.	[X] Fri.	(X) Sat.	ĺ _X Sun.	
Shifts		•						
day:	_2	_2	2	2		*	*	
lst	46	46	46	46		*		
Empl's per 2nd	3	3		3		* *	*	
shift 3rd				•		*	*	
Shift Ist	<u>8 AM -</u>	4:30 PM				*	*	
start ind 2nd	<u>4 PM -</u>	<u>l2 midni</u>	ght			*	*	
nd imes: 3rd	· · · · · · · · · · · ·					<u>.</u>	• 	
	1			*Sat	& Sun	dependent	t upon p	roduc
Indicate	whether th	ne business	activity	is: loa	ad - ove	rtime		
600/mumo		, .				· . ·		
COMMENTS:			•					
COMMENTS:			· · · · · · · · · · · · · · · · · · ·		· · · ·			
LOMMENTS: Indicate wh	ether the	facility d	ischarge	is:				
Indicate wh	ether the nuous thro	facility d ugh the ye	ischarge : ar, or	is:				
Indicate wh [X] Contin [Seasor activi	ether the nuous thro nal - Circ lty occurs	facility d ugh the ye le the mon :	ischarge ar, or ths of the	is: year dur	ing which	the busine	255	
Indicate wh [X] Contin [Seasor activi] F	ether the nuous thro hal - Circ ity occurs M A	facility d ugh the ye le the mon : M	ischarge ar, or ths of the J J	is: year dur A	ing which S (the busine N	ess D	
Indicate wh [X] Contin [] Seasor activi J F COMMENTS:	ether the nuous thro hal - Circ lty occurs M A	facility d ugh the ye le the mon : M	ischarge ar, or ths of the J J	is: yeardur A	ing which S (the busine) N	ess D	
Indicate wh [X] Contin [] Season activi J F COMMENTS:	ether the nuous thro hal - Circ ity occurs M A	facility d ugh the ye le the mon : M	ischarge ar, or ths of the J J	is: year dur A	ing which S (the busine	ess D	
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Indicate wh [X] Contin [] Season activi J F COMMENTS:	ether the nuous thro hal - Circ lty occurs M A	facility d ugh the ye le the mon : M	ischarge ar, or ths of the J J	is: year dur A	ing which S (the busine) N	ess D	

N 1

- 4. Does operation shut down for vacation, maintenance, or other reasons?
 - [x] Yes, indicate reasons and period when shutdown occurs:

[] No

5. List types and amounts (mass or volume per day) of raw materials used or planned for use (attach list if needed):

Copper rod and billets - 220,000 pounds per day

6. List types and quantity of chemicals used or planned for use (attach list if needed). Copies of Material Safety Data Sheets will be reviewed during the Annual Inspections of your facility. (if available) for all chemicals identified:

Chemical

Quantity

Sulphuric Acid

Hydrogen peroxide

10% sulphuric acid sol'n

50% sodium hydroxide

Zinc chloride 50%

ADL drawing solution

Rich Cool Coolant

<u>500 gal. max.</u> 500 gal. max. 7,500 gal. max.

3,000 Lbs

200 gal.

15,000 Gal. max. (94% water)

20,000 Gal. max. (99.6% water)

7. Building Layout - Draw to scale the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), public sewers, and each facility sewer line connected to the public sewers. Number each sewer and show existing and proposed sampling locations. This drawing must be certified by a State Registered Professional Engineer.

A blueprint or drawing of the facilities showing the above items may be attached in lieu of submitting a drawing on this sheet.

Previously submitted to Joint Meeting.

SECTION I - SPILL PREVENTION

 Do you have chemical storage containers, bins, or ponds at your facility? [X] Yes [] No See attachment

If yes, please give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to a sewer or storm drain. Indicate if buried metal containers have cathodic protection.

- Do you have floor drains in your manufacturing or chemical storage area(s)?
 Yes [X] No If yes; Where do they discharge to?
- 3. If you have chemical storage containers, bins, or ponds in manufacturing area, could an accidental spill lead to a discharge to: (check all that apply).
 - [] an onsite disposal system
 - | public sanitary sewer system (e.g. through a floor drain)
 - [] storm drain
 - [] to ground

L

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] No

- other, specify:
- [x] not applicable, no possible discharge to any of the above routes
- 4. Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or slug discharges from entering the Joint Meeting's collection systems?
 - Yes [Please enclose a copy with the application]
 - * [X] N/A, Not applicable since there are no floor drains and/or the facility discharge(s) only domestic wastes.
- 5. Please describe below any previous spill events and remedial measures taken to prevent their reoccurrence.

Packing in a liquid system failed causing a minor discharge of coolant solution. The packing was repaired. A release of drawing solution occurred when the evaporator dike leaked. The dike was sealed, tested and a storage tank gravity feeding the evaporators was demolished to prevent a reoccurrence.

*See discussion on floor drains in Section I #1 notes. Daily inspection of all critical process tanks are completed every shift and cocumented by engineering and/or manufacturing personnel. In addition, the Security Guards monitor critical tank system during their scheduled rounds.

SECTION J - NON-DISCHARGED WASTES

- 1. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?
 - [X] Yes, please describe below [] No, skip the remainder of Section J

[]			
Waste Generated	Quantity (per year)		Disposal Method
<u>Copper Hydroxide</u>	_10,000_Lbs	•	Off site

Sludges	10,000 gal.	Off site
Waste Oil Mixture	20,000 gal.	Off site
Zinc Chloride Flux	500 Lbs.	Off_site

- Indicate which wastes identified above are disposed of at an off-site 2. treatment facility and which are disposed of on-site.
- If any of your wastes are sent to an off-site centralized waste 3. treatment facility, identify the waste and the facility. See attachment
- If an outside firm removes any of the above checked wastes, state the 4. name(s) and address(s) of all waste haulers:
 - a. Environmental Management Strategies 209 N. Center Drive

N. Brunswick, NJ 08902

Permit No. (if applicable):

Permit No. (if applicable):

Have you been issued any Federal, State, or local environmental permits? 5.

[X] Yes [] No

If yes, please list the permit(s): Air permits for tin pots 1856/57 and two atmospheric evaporators. Boiler stack permits for #1 and

#2 boilers,

SECTION K - AUTHORIZED SIGNATURES

Compliance certification:

1. Are all applicable Federal, State, or local pretreatment standards and requirements being met on a consistent basis?

Yes [X] No [] Not yet discharging []

2. If No:

- a. What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.
- b. Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note that if the Joint Meeting issues a permit to the applicant, it may establish a schedule for compliance different from the one submitted by the facility.

Milestone	Activity				Comple	etion D	ate	
							· .	· · · ·
							<u> </u>	
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CERTIFICATION STATEMENT / AUTHORIZED REPRESENTATIVE STATEMENT

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

In consideration of the granting of this permit, the undersigned agrees:

I. To furnish any additional information (including reports) relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the Joint Meeting.

2. To accept and abide by all provisions of the Joint Meeting Regulations and the Municipal Sewer Use Ordinance, and of all other pertinent Ordinances or Regulations that may be adopted in the future.

3. To operate and maintain any wastewater pretreatment facilities, as may be required as a condition of the acceptance into the wastewater treatment system of the industrial wastes involved, and subject to amendments to the Permit (including, but not limited to, Compliance Schedules).

4. To cooperate at all times with the Joint Meeting and its representatives in their inspecting, sampling and study of the industrial wastes, and any facilities provided for pretreatment.

5. To notify the Joint Meeting immediately in the event of any accident, or ther occurrence that occasions the contribution to the wastewater treatment system of any wastewater or prohibited substances not covered by this permit.

<u>James J. Szalay</u> Name(s)	Environmental Coordinator Títle
Janes J. Szaly Signature	$\frac{4/22}{Date}$ 908-351-3200 x 223 Phone
	· · · · · · · · · · · · · · · · · · ·
FOR JOINT	MEETING USE ONLY
Inspection/Permit Fee \$	Paid
Application Approved (Date)	Effective Date of Permit
igned	Title

JOINT MEETING

Section I #1

Sulfuric acid storage - one pallet with secondary containment in extrusion department - no sewer drain access.

Sulfuric acid solution storage tank - 7,500 gal. rubber lined tank located next to storeroom building in a diked area - no sewer drain access.

Hydrogen peroxide - one pallet with secondary containment in extrusion department - no sewer drain access.

50% solution hydroxide - in 700 Lb. plastic drums stored within diked waste treatment area - no sewer drain access.

50% zinc chloride - in 30 gal. DOT plastic drums stored within the storeroom building below grade - no sewer drain access.

Two ADL Drawing Solution Storage Tanks -1 - 10,000 gal., 1 - 5,000 gal., in a diked area - no sewer drain access.

Rich cool coolant solution system with three sumps totalling 20,000 gal. - no sewer drain access.

Note: All tank systems have been fitted with an elaborate hinlevel alarm system and spring loaded water addition values to eliminate the possibility of chemical spills. Every floor drain inside the manufacturing building with a remote possibility of receiving a chemical spill has been permanently sealed off.

OFF SITE WASTE LOCATIONS - SECTION J # 3

FOR JOINT MEETING

TSOF NAME	TSDF ID	ADDRESS	CITY_STATE_ZIP	WASTE STREAM
NICHIGAN DISPOSAL, INC.	NID000724831	49350 NO. I94 SERVICE DRIVE	BELLEVILLE, MI 48111	COPPER HYDROXIDE, SLUDGES
RENTECH	NJD980536577	1800 CARNAN STREET	CANDEN, NJ 08105	WASTE OIL MIXTURE
RENIECH (PA.)	PAD067098822	550 INDUSTRIAL DRIVE	LEWISBERRY, PA 17339	ZINC CHLORIDE FLUX





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TIERRA-B-016685

JOINT MEETING of ESSEX AND UNION COUNTIES 500 South First St. Elizabeth, N.J. 07202

INDUSTRIAL SEWER CONNECTION/ NON-DOMESTIC WASTEWATER DISCHARGE PERMIT APPLICATION

To the Joint Meeting of Essex and Union Counties:	
The undersigned, being the Phelps Dodge Copper Prods. Co.	of the
Owner/Tenant	
property located at 48-94 Bay Way, Elizabeth, N. J. 07207	
does hereby request a permit touse	_an industrial
Connect /IIco	
Connectyose	
sewer connection serving Phelps Dodge Copper Prods. Co.	, which
sewer connection serving Phelps Dodge Copper Prods. Co. Company Name	, which
sewer connection serving <u>Phelps Dodge Copper Prods. Co.</u> Company Name company is engaged in <u>Manufacturing Copper Rod and Wire</u>	, which

at said location.

ENCLOSURES

- A plan of the property showing accurately all sewers and drains now existing is attached hereunto as Exhibit "A".
- Plans and specifications covering any work proposed to be performed under this permit is attached hereto as Exhibit "B".
- 3. A complete schedule of all process waters and industrial wastes produced or expected to be produced at said property, including a description of the character of each waste, the daily volume and maximum rate of discharge, representative analyses, and compliance with any applicable Pretreatment Standard or requirements, is attached hereunto as Exhibit "C".
- 4. The name and address of the person or firm who will perform the work covered by this permit is

Phelps Dodge Copper Prods. Co. (address above)

In consideration of the granting of this permit, the undersigned agrees:

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TIERRA-B-016686

- 1. To furnish any additional information relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the Joint Meeting.
- 2. To accept and abide by all provisions of the Joint Meeting Regulations and the Municipal Sewer Use Ordinance, and of all other pertinent Ordinances or Regulations that may be adopted in the future.
- 3. To operate and maintain any wastewater pretreatment facilities, as may be required as a condition of the acceptance into the wastewater treatment system of the industrial wastes involved, in an efficient manner at all times, and at no expense to the Joint Meeting.
- 4. To cooperate at all times with the Joint Meeting and its representatives in their inspecting, sampling and study of the industrial wastes, and any facilities provided for pretreatment.
- 5. To notify the Joint Meeting immediately in the event of any accident, or other occurrence that occasions the contribution to the wastewater treatment system of any wastewater or prohibited substances not covered by this permit.

Date: March 18.85

Signed K.K.De

Title Engineering Manager

For Joint Meeting Use Only

\$ Inspection/Permit Fee Paid

Application Approved and Permit Granted:

Date:

Signed____

EXHIBIT "A" - P. D. Drawing #J-341-B (attached)

EXHIBIT "B"

Phelps Dodge Copper Products Co. plans to expand the present effluent collecting and neutralizing tank system to incorporate dual sandfilters to maintain compliance parameters.

Specifics can be supplied later.

EXHIBIT "C"

Boiler feed water,

None contact cooling water for various heat exchangers for the Wire Drawing Machines and Flat Wire Rolling Mills.

Makeup water for the Fire Protection System, Makeup water for Recirculating Systems such as Wire Mill equipment and Extrusion System.

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Total discharge for the above

54,750 Gal./Day

Effluents prior to discharge are neutralized, tested daily for PH and total copper concentration

JOINT MEETING INDUSTRIAL INSPECTION REPORT

Facility Name: PHELPS DODGE COPPER I.D.# 0120 Date: 10/1/85 Time: 0920 or Location:
Street: BAYWAY
Town: ELIZABETH, N.J. Phone: 351-3200
Inspector: J.KRAUS, A. MALANGA Person Contacted: KURT BEHRSIN Position:
Weather Conditions: Clear I Rain I Snow I
Wind Direction: SE Temp: 74°F Speed 5-8 MPH
Inspection Observations: Odors: On Site // Yes /X/ No Off Site // Yes /X/ No
Source:
Leaks, Spills: On Site / Yes / No Off Site / Yes / No
Source:
Overall Housekeeping: Poor // Fair / Good // Excellent //
Monitoring System: Air // Yes // No
Water // Yes // No
Pretreatment System: 🖉 Yes /// No
Description: Electrolytic recovery of copper from Acid
pickling process. Overflow treated with soda Ash & for
PH adjustment
Number of Outfalls rive (one process outfall)
Description: 1. (Process) Treated water from
& reid pickling (2) hon-contact
3. cooling water (3) Boiler blow-down.
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Inspector's Signature

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Samples Gathered: // Yes // No Number
Photos: / Yes / No No. Location:
1
2
3
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5
Observations and/or Other Comments. The purpose of the inspection
tour was to try to pin-point the source of the
high copper concentrations found in the manhole
near the truck scale. This monhole is the JM sampling
point and the last manhale before the BAyway
interceptor. A BMR, recently submitted by Phelps
Dodge, showed that the facility is in compliance
with the categorical standards at the point source
but out of compliance at the manhole.
Mr. Kurt Behrsin Accompanied is on the tour.
He showed us how All contact and non-contract
cooling water is recirculated in the cold rolling, drawing
ind extruding operations. No leakage or spillage was
detected. The only water wasted is from the acid
pickling operation (which is also recirculated until
such time as the pickling solution becomes useless

Inspector's Signature

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Observations and/or other comments

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saturation with copped. This pickling waste to duc sulfuric -tl neid treated And Anelectr through Solution 15 Fun Su narged tANK to hold 129 150 a rser with ASh Soda tcal inpe Fre rage -90 gpd. his rate 04 70 Aqua tested Science hac by Princeston which source it Cor that ie not the the manhole. the JULTING high copper investigation, Mr. Behrsin CXD lained AT Aim the east building At one time the -to larger Dickling impling point oused the older and waste discharged perAtion untrented thint this Probable 50 years. 14 Very sout is created the sluda rich waste COL DEAring noticed by PAS recen during A SAMPLING OPERAtion It is there recomended that JM test the (C point discovered WASte SAmpling upstream sludge-bearing Pateral to See indge he source theory is CODDEr. niah further the sludge 1t is reconner that correct, this pipe fürther to prevent be removed oeacl t he. SANITAR ing Copper to

Inspector's signature

• Facility Plan - Show locations of Process equipment Pretreatment equipment, outfalls, etc.

	(see attached)
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Inspectors Signature

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