

~~George~~

Harold ←

To	AI
Subject	Sewage
Date	6/28/65

Today an investigator (SINCE C. HACKETT) for the Harbor Supervision Branch of the U.S. Army Engineers gave the brook and our effluent a thorough going over including the taking of samples. He found the trickle from our acid pond which gets into the brook.

He associated this with large amount of acid detected in river on Saturday and traced to brook. Could not talk him out of this! Am as sure as can be about these kind of things, that we did not acidify big portion of river (they found acid 75' from shore) if samples taken ~~now~~ today match river samples taken Sat we will

receive a citation. Even if not ours, will probably match as would guess it will test as sulfates as will our leak. If cited, we will have 30 days to correct (or to show cooperation and "probably" to be able to obtain an extension of time)

Very poor land fill makes walls of acid pit a nightmare for leakage. Will not be easy to correct. Also, must consider long term effect of seepage into ground. Does it get to in to brook underground? ~~Yes~~

Date _____ Signed _____

2

To	At
Subject	Date

Or is it collecting underground? We do not want our structures attacked by acid from below.

A problem of the future is the fact that an adverse effect of water recirculation is the loss of the considerable diluent effect of clean water on wastes.

Apparently, the hope from Air Pollution was correct - the area is getting attention from the Army Engineers. Hackett told me almost all water-front plants have been cited. They are very thorough, use a Polaroid

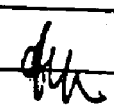
DUPLICATE

Signed

camera as well as a movie camera. Work from both a boat & with a shore patrol. Take samples, measure distance ~~etc~~, records times, etc

Color is another problem! Oil also (^{inquiries} solvents)

Any long term plans we make should include proper handling of our effluents.

Shaul 

Date	Signed
------	--------

CORPS OF ENGINEERS, U. S. ARMY
SUPERVISOR OF NEW YORK HARBOR
111 EAST 16TH STREET
NEW YORK, N. Y. 10003

IN REPLY REFER TO

NANSL
Case No. 65-294

11 January 1966

Alliance Color & Chemical Company
33 Avenue P
Newark, New Jersey

Gentlemen:

The Supervisor of New York Harbor is charged by the Congress of the United States with the responsibility of preventing obstruction or pollution of the navigable waters of New York Harbor or its tributaries.

On several occasions, commencing on 26 June 1965, and subsequent to that date, a discoloration has been observed in the tidal waters of Newark Bay adjacent to the Archer Daniels Midland Company's bulkhead located at 400 Doremus Avenue, Newark, New Jersey. Samples of the discolored tidal waters were obtained on each occasion and when tested disclosed they contained an acidic content with a pH factor in excess of allowable tolerance. Investigations disclosed that the materials, classified as a pollutant and a contravention of Federal Statutes (U.S.C. Title 33, Section 407), were discharging from a flume in the bulkhead of aforementioned property. The flume was covered by a flapper type covering which operated on an inshore to outfall velocity flow pressure principle. Continuation of the investigation disclosed that at least a portion of the pollutant originated at your facility and had been deposited into an earthen ditch, maintained as a mosquito control ditch by the Essex County Mosquito Extermination Commission, which traverses various other company owned properties and deposits its contents into aforementioned

NANSL
Case No. 65-294
Alliance Color & Chemical Co.

11 January 1966

flume. Samples obtained on 28 June 1965 from your plant facilities and immediately adjacent thereto, were analysed by the United States Customs Laboratory. The analysis report received indicates compatability as to content between the materials found in the tidal waters of Newark Bay and those stored and discharged from your facilities.

During our most recent inspection, conducted on 7 December 1965, acidic liquefied materials were again detected being deposited from the same flume into Newark Bay. Samples obtained from the terminus of the flume, at various locales along the mosquito control ditch and in the immediate vicinity of your plant facilities, when tested, all recorded a high acidic content. While inspecting the area three clay pipes, discharging liquid, were observed on your property. Samples of discharge from each ~~each~~ of these pipes were obtained and when tested disclosed they all contained a prohibited acidic content.

Under the provisions of Federal Statutes (U.S.C. Title 33, Section 407), it is unlawful to deposit, or cause, or permit to be deposited, material of any kind in any place where the material shall be liable to be carried to and deposited in any navigable water of the United States. Violators of this Statute are liable to prosecution.

Mr. Charles P. Motta, your Plant Superintendent, was contacted on 28 June and 7 December 1965 and informed of the violations herein cited.

Immediate steps should be taken to insure no prohibited materials, of any kind, are deposited at any place, where such materials may be deposited in Newark Bay.

NANSL
Case No. 65-294
Alliance Color & Chemical Co.

11 January 1966

A reinspection will be conducted to insure compliance
with cited Federal Statute.

Very truly yours,



F. R. ULRICH
Major, Military Police Corps
Assistant Supervisor of
New York Harbor

January 20, 1966

F. R. Ulrich, Major, Military Police Corps
Assistant Supervisor of New York Harbor
Corps of Engineers, U. S. Army
111 East 16th Street
New York, New York 10003

Dear Major Ulrich:

Reference: NAVSL - Case No. 65-294

This will acknowledge your letter of 11 January 1966 and provide you with a remedy report. We appreciate your bringing this situation to our attention, and want you to know that both your investigations did, in fact, receive our careful and complete attention.

The June 1965 event was traced to a leak in a pit wall. Normal subsequent repair work failed to convince us that we had effected a long-term repair, and so to fully remedy this situation, a new enlarged acid collection system has been constructed and is now in service. We would not expect any repetition of the 28 June 1965 events.

The acidic materials disclosed in your December 1965 inspection were traced to a malfunctioning collection pump. This was restored to service promptly. New inspection and maintenance schedules were instituted and careful follow-up has indicated that the collection system is performing satisfactorily.

We welcome a re-inspection and look forward to your inspector's next visit, so that we may show him our facility properly operating.

.....continued.....

*P. R. Ulrich, Major, Military Police Corps
Corps of Engineers, U. S. Army*

*Page 2
January 20, 1966*

*Meantime, Major Ulrich, please be assured that you and
your department will have our fullest cooperation and know that we
understand the need to prevent pollution of New York Harbor waters.*

Sincerely,

ALLIANCE COLOR AND CHEMICAL CO.

*Frank W. May
General Manager*

FWM:ao

cc MHS

CPM/d → CM Lu → WAH → FWM

To: George
 Subject: U.S. Army Engineers
 Date: 1/12/66

Here is a letter covering both the complaint & previous reported. Will you have a copy photo'd for me?
 I judge this as their #1 "gentle" approach.

We should have careful guidance in handling. It can be answered over ground in so far as answering. Best long term range technique for having a special - in court is an answer. But - we must keep in mind the fundamental problem - everything (except what is acid for Adgt) goes to the book.
 RETURN TO

Doc. 26 (the firm) was the leading acid pit which we hope we have controlled. The other (Doc) was a pit of sulfur in an acid system. At least in this area which is agreed with the inspector at times.

The inspector told me that he was, the source is under a special job follow-up work through by a man who will be returning to me.

Date: _____ Signed: _____

To George

Subject U.S. Army Engineers

Date 12/22/65

This will record the 12/7/65 visitation as
feel sure a citation is going to result. (I told
you of this verbally.)

Investigator Hockett, accompanied by a Mr Young
of the N.J. Mosquito Commission sampled the brook from
ladder water up to our plant and said we were
cause of acid in the sewer.

That we convinced him that cause
was malfunction of our acid collection system,
and if so, citation (if it comes) should be
relatively easy to handle.

RETURN TO →

Signed

Handwritten signature

1/10/65. Received NANSU Car 65-294

Handwritten signature

Date

Signed

TO: George Shulman

DATE: August 5, 1968

FROM: C. P. Kotta

SUBJECT: Alliance Plant Effluent

For the past six months, the Alliance plant has had increasing disruption of production because of inundation from the drainage stream. The areas effected are: Bldg. 5, drying; Bldg. 4, first floor production; Bldg. 6, downstairs office, foreman locker room, and hourly employees lunch room; and front yard, shipping and receiving.

1. Investigation of flooding indicates the following causes:

1.1 Tide gate in Passaic River missing, or completely inoperative, and metal pipe corroded to the extent that a new tide gate, at this location, would not function properly, causing flooding during high tides and heavy rains.

1.2 Hydraulic dirt movements, by the turnpike, caused abnormal flows of water into the same drainage stream being used by Alliance. Because of the problem stated in (1), periodic flooding occurred.

1.3 As recently as July 10 thru July 18, flooding was continuously bad, and not until the Mosquito Commission was forced to bring in their shovel and dig debris from the drainage stream behind Reffer Smelting, did the stream flow freely. This is the same area that required digging two years ago. This debris is not indigenous to Alliance, but is to the surrounding dumps. It is possible, however, that the suspended solids discharged from Alliance could add to the other debris at this location, thus adding to the obstruction.

2. The following information was obtained during our attempts to alleviate the stream blockage:

2.1 Mr. Amabile, Director, Essex County Mosquito Commission. The Urban Renewal Project is moving ahead with its program to make land available for industry and, starting July 15, 1968, drainage streams, South of Alliance, are being dug and directed to our drainage ditch, which will all feed through one discharge pipe leading under Doremus Avenue to the Passaic River and through the tide gate as indicated in 1.1. According to Mr. Amabile, due to the inoperative tide gate, plans for a new tide gate East of Doremus Avenue, in the drainage ditch, are under study and consideration.

2.2 Louis LaFera, contractor working on Avenue P, has indicated that an industrial sewer is already in Avenue P and storm sewers will be in shortly. By contacting Mr. Van Riper, City Engineer, Bureau of Sewerage, we can seek permission to tie into the Newark Sewerage System.

2.3 Mr. Berkowitz, of American Fat Rendering Plant behind Alliance, has incurred considerable losses because of the flooding condition. He is currently not hostile toward us, but was when he associated the color of the water flooding his plant to the color of the water in Alliance's acid pond. He has seen the problems as stated and now feels that we have a common problem. Mr. Berkowitz is starting litigation to recover his losses. from -be'

Observations:

For the past several years, Alliance has had to account to the Harbor Commission, Passaic Valley Sewerage Commission, City and State, and Air and Water Pollution Authorities for the color, pH, and odors of the drainage stream. Our present method of handling our acidic waste and color is inadequate and would not serve as a convincing method of neutralization of plant waste water.

It has also become apparant that the Mosquito Commission has not been caring for the drainage stream as in years past. They formerly cleared the stream every two years and serviced their "in stream" flood gates.

All agencies, listed above, are cognizant of Alliance's plant effluent discharged into the drainage stream and have been procrastinating, for the past several years, from applying any real pressure to Alliance. Other companies, feeding effluent to the same stream, have had pressure applied. A.D.K. Chemlime, Celanese and, to some extent, Reffer Smelting, have had to make some changes in their effluent discharges. Alliance built an acid pond. It is very difficult, however, to mask our continuous "red color" water that comes from our plant.

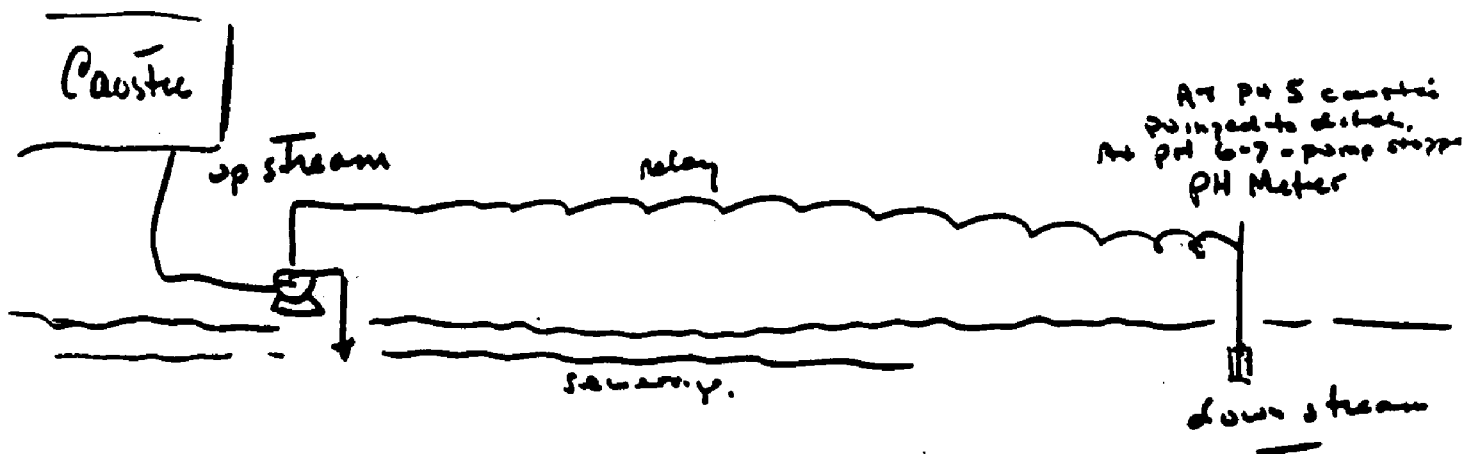
Sun Chemical has purchased the property adjacent to Alliance and the dumps behind Alliance and, from what I understand, plan to build a phthalocyanine blue unit.

3. I recommend the formation of:

- 3.1 In-plant pollution control committee. { in the name heard
- 3.2 Flow measurement information by the use of a Weir.
- 3.3 Samplings of waste water to provide needed information.
- 3.4 Prepare a study of the best system for waste water neutralization from current information, keeping in mind Sun Chemical's expansion plans and our final goal of connecting into industrial sewers and becoming isolated from flooding of the drainage ditch.

I suggest that we start action now toward a complete plant effluent neutralization system that will ultimately connect into the city industrial sewerage. An immediate temporary neutralization system should

be contemplated or provided to plant effluent now feeding the stream to preclude any confrontations with pollution authorities. It is my feeling that our effluent will be under scrutiny as soon as the Urban Renewal Project gets under way and a new tide gate is constructed. Also, we could be the subject of repercussion if and when American Refining litigation begins.



March 21, 1972

Mr. Sam Friscia
Director of Public Works
City Hall
920 Broad Street
Newark, New Jersey 07102

Dear Mr. Friscia:

I would like to call to your attention a surface water condition that exists around our chemical plant on Avenue P (Ironbound Section) that has caused our plant to shutdown in the past and now threatens to close our door again.

The problem is this: Our plant is surrounded by a drainage ditch (commonly referred to as Plum Creek) which collects run-off water from the Turnpike and surrounding properties and discharges into the bay. We are completely isolated from this creek, i.e., we do not discharge any water whatsoever into this creek, yet whenever this creek backs up the overflow empties into our plant resulting in emergency conditions which have often resulted in water damages to our stock and at times complete plant shutdowns. The shutdown causes a loss of production and business and results in unemployment for all our workers.

The only reason that Plum Creek backs up is that there are obstructions inhibiting the discharge of water to the bay. We have found that there are two areas where obstructions occur. (1) On the property of Revere Smelting where Plum Creek turns east and passes under a dirt roadway, and (2) under Avenue P. I have called the Department of Sewers on these occasions and most times they have tried to clear away the obstruction and let the creek subside, but on other occasions the response by the Department of Sewers has been delayed by equipment availability, manpower availability, the elements, or other reasons beyond my knowledge and as a result the condition previously described at our plant occurred. At this writing we have had a pending flooding condition existing at our plant since February 28th (over 3 weeks) with no apparent attempt to alleviate the same by the Department of Sewers despite at least seven (7) calls to their office.

I see no legitimate reason why our plant must continually face this flooding problem year in and year out when a solution is obvious - install a large obstruction-free (closed) passageway for the water to flow from the turnpike to the eastern side of Avenue P.

Mr. Sam Friscia

March 21, 1972

-2-

Another continuing effect of the flooding is that our plant waste water that is normally discharged into the Avenue P sewer system is pre-treated prior to entering the system. The extra heavy load of water from the creek pouring into our treatment facility has caused our treatment plant to become overloaded and at times unable to handle the flooding conditions.

I am quite anxious to learn what efforts are being taken by your department to remedy the above described situation. The company and the union would be appreciative of your efforts to see the above problem eliminated once and for all.

Very truly yours,

RICHARD D. LEONARD
Plant Manager

RDL:me

cc: Mr. Roger Altero
Department of Sewers
Broad Street
Newark, New Jersey

Mr. Al Zach
Chief Engineer
Department of Public Works
920 Broad Street
Newark, New Jersey



ALLIANCE CHEMICAL INC
A SUBSIDIARY OF PFISTER CHEMICAL INC
NEWARK, N. J. 07102

June 21, 1972

Mr. Sam Friscia
Director of Public Works
City Hall
920 Broad Street
Newark, New Jersey 07102

Dear Mr. Friscia:

Since the latter part of February our plant has been under constant threat of being over run with flood waters from the drainage ditch (Flum Creek) that borders our property. A letter to you (March 21, 1972) and a visit by yourself to our plant (May 18, 1972) has not given me any satisfaction that our problem will be rectified. I have been very patient todote, but at this writing my patience has run out.

I was promised a letter on May 18th stating your intentions on the above matter. Five weeks later there has still been no letter. I was told that the construction to alleviate the water condition would be completed in June or July 1972. Todote it has not started.

I am responsible for the production activities of this Division and responsible to take steps to keep production going especially when I can see impending disaster on the horizon. In dealing through your office with Messrs. Al Zack, Roger Altero and Van Reiper I have no confidence that any action will be taken in time to prevent this disaster.

This letter should reach your desk on Friday June 23rd. Should I not receive any correspondence by June 26th, outlining the positive steps the city will take to correct the problem caused by their poor design I shall have to take my cause to higher authorities. I am hoping that the letter will not be necessary.

Very truly yours,

Richard D. Leonard
Plant Manager

June 27, 1972

The Honorable Kenneth Gibson
The Mayor of the City of Newark
Newark City Hall
920 Broad Street
Newark, New Jersey 07102

Dear Mr. Mayor:

I am appealing to your office for assistance to alleviate a problem that has been plaguing our plant for many years - the threat of being inundated by waters backing up into our plant from a drainage ditch (Plum Creek) that borders our property. I am writing to you because my previous contacts with the Department of Sewers and the Director of Public Works and his Staff has only resulted in empty promises and no action.

During the rainy season of 1971 we were forced to shutdown our entire operation three times and sustained considerable property damage and loss of wages to our 50 employees. The cause of these problems is a recently installed, underdesigned drainage pipe under Avenue P. This pipe is now blocked and water from Plum Creek cannot escape to the bay and has no other route, but to back up into our plant.

I have been promised relief by the above departments on over 25 different occasions since February 1972, but to date nothing has been done to make our situation any less critical. At this writing the Plum Creek has overflowed its boundaries and is only a few feet from running over into our property.

It is my responsibility to keep this division operating and I am appealing to your office to see that proper steps are taken to ease our situation.

Very truly yours,

Richard D. Leonard
Plant Manager

JAMES J. McMAHON
CHAIRMAN
DOMINIC W. CUCCINELLO
VICE CHAIRMAN
CARMINE T. PERRAPATO
BENJAMIN W. GORDON
SAMUEL L. BIBER
COMMISSIONERS

PASSAIC VALLEY SEWERAGE COMMISSIONERS
790 BROAD STREET
NEWARK N. J. 07102

SEYMOUR A. LUBETKIN
CHIEF ENGINEER
THOMAS E. DURKIN, JR.
ATTORNEY
MRS. CHARLES T. SCHAEDEL
CLERK-TREASURER

December 18, 1969

R.D.C.

Pfister Chemical Inc.
Ridgefield, New Jersey 07657

Attention: Mr. Judson H. Merl, Plant Engineer

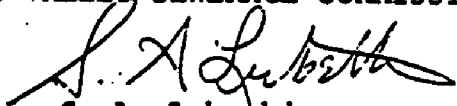
Dear Mr. Merl;

A sample taken from your Newark plant of your discharge to Plum Creek on December 10, 1969, was found to be flammable and had a explosimeter reading of 80 per cent. This is a dangerous sample and will not be allowed to be discharged into the sewer when you have completed your connection.

Please determine the source of this material so that it may be isolated from the material you intend to put in the Newark Sewer.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS


S. A. Lubetkin,
Chief Engineer

SAL:mr

c.c. to: Commrs. McMahon,
Gordon,
Cuccinello
Perrapato
Biber
Attorney, T. Durkin, Jr.
Messrs. Goldberg
Barcellona,
Cuccinello

Certified Mail

CORPS OF ENGINEERS, U. S. ARMY
SUPERVISOR OF NEW YORK HARBOR
111 EAST 16TH STREET
NEW YORK, N. Y. 10003

IN REPLY REFER TO

NANSL
Case No. 65-294

9 March 1966

Alliance Color & Chemical Co.
33 Avenue P
Newark, New Jersey 07105

Gentlemen:

Reference is made to our letter of 11 January 1966 and your letter of reply dated 20 January 1966 concerning the illegal discharge of acid into Newark Bay in violation of Federal Statutes (U.S.C. Title 33, Section 407).

On several occasions, during the month of February 1966, inspections revealed that acid was still being deposited into the bay. We are aware that you are attempting to correct the situation, however, investigation disclosed that action taken to date had not completely negated the pollution.

Expeditious correction is of primary importance since the materials deposited have been found to be excessively acidic and injurious to navigation.

A reinspection will be conducted to insure compliance with the cited Federal Statute.

Very truly yours,



F. R. ULRICH
Major, Military Police Corps
Assistant Supervisor of
New York Harbor

*Please return
this or a Xerox for Howard file*

*Rec'd 3/11/66
F*



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

JUN 19 2002

**GENERAL NOTICE LETTER
CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

Mr. Alan R. Bendelius, President
Alliance Chemical, Inc.
Linden Avenue
Ridgefield, New Jersey 07657

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

Dear Mr. Bendelius:

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 ("CERCLA"), as amended, 42 U.S.C. §9601 *et seq.*

EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the Passaic River Study Area which is part of the Diamond Alkali Superfund Site ("Site") located in Newark, New Jersey. By this letter, EPA is notifying Alliance Chemical, Inc. ("Alliance") of its potential liability relating to the Site pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a). Under CERCLA, PRPs include current and past owners of a facility, as well as persons who arranged for the disposal or treatment of hazardous substances at the Site, or the transport of hazardous substances to the Site.

Sediment in the Passaic River contain numerous hazardous substances, pollutants and contaminants. Based on information that EPA has evaluated during the course of its investigation of the Site, EPA believes that hazardous materials were being released from Alliance's facility located at 309-327 Avenue P in Newark, New Jersey, into the Passaic River Study Area. Hazardous substances, pollutants and contaminants released from the facility into the Passaic River Study Area present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, Alliance may be potentially liable for all response costs which the government may incur relating to the Passaic River Study Area.

840570001

Internet Address (URL) • <http://www.epa.gov>

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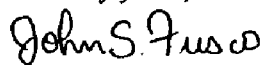
Under Sections 106 (a) and 107(a) of CERCLA, 42 U.S.C. §9606(a) and §9607(a) and other laws, potentially responsible parties ("PRPs") may be obligated to implement response actions deemed necessary by EPA to protect public health, welfare or the environment, and may be liable for all costs incurred by the government in responding to any release or threatened release at the Site. If response actions are performed by EPA rather than by the PRPs, those PRPs may be subject to legal action pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a), to recover public funds expended by EPA in response to the release and threatened release of hazardous substances at the Site. Such actions and costs may include, but need not be limited to, expenditures for conducting a Remedial Investigation/Feasibility Study ("RI/FS"), a Remedial Design/Remedial Action, and other investigation, planning, response, oversight, and enforcement activities. 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.

For your information, some RI/FS work has been performed in the Study Area by Tierra Solutions, Inc. ("TSI"), formerly known as Chemical Land Holdings, Inc., pursuant to certain contractual arrangements with the Occidental Chemical Corporation, under an Administrative Order on Consent. TSI can be contacted at the addresses listed in the Attachment to this letter. Other PRPs who have received Notice letters are also listed in the Attachment. This list represents EPA's findings on the identities of PRPs to date. Inclusion on, or exclusion from, the list does not constitute a final determination by EPA concerning the liability of any party for the release or threat of release of hazardous substances at the Site. Be advised that notice of your potential liability at the Site is being forwarded to OCC by EPA.

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

If you wish to discuss this further, please contact Mr. Winfield at (212) 637-4362 or Ms. Reddy at (212) 637-3106. Please note that all communications from attorneys should be directed to Ms. Reddy.

Sincerely yours,


George Pavlou, Director
Emergency and Remedial Response Division

Attachment

840570002

cc: Fredi L. Pearlmutter, Esq.
Cooper, Rose & English, LLP

Paul W. Herring, Esq.
Andrews & Kurth

Mr. Richard P. McNutt
Tierra Solutions, Inc.

Sarah Hurley, Esq.
Robinson & Cole LLP

840570003

Contacts for Tierra Solutions, Inc. (f/k/a Chemical Land Holdings, Inc.):

Technical	Legal Counsel
Richard P. McNutt Tierra Solutions, Inc. Two Tower Center Blvd., 10 th Floor East Brunswick, New Jersey 08816 Telephone: 732-246-5849	Paul W. Herring, Esq. Andrews & Kurth L.L.P. 1717 Main Street, Suite 3700 Dallas, Texas 75201 Telephone: 214-659-4504

PRPs in Receipt of Notice Letters:

PRP	LEGAL COUNSEL
J. Roger Hirl President and Chairman of the Board Occidental Chemical Co. Occidental Tower 5005 LBJ Freeway Dallas, TX 75244	Paul W. Herring, Esq. Andrews & Kurth L.L.P. 1717 Main Street, Suite 3700 Dallas, Texas 75201 Telephone: 214-659-4504
President Chris-Craft Industries, Inc.* 767 Fifth Avenue, 46th Floor New York, NY 10153	Peter Simshauser, Esq. Skadden, Arps, Slate, Meagher & Flom 300 South Grand Avenue Los Angeles, CA 90071-3144
President Reilly Industries, Inc.* 1510 Market Square Center 151 North Delaware Street Indianapolis, IN 46204	General Counsel Reilly Industries, Inc.
Chairman of the Board The Sherwin-Williams Company* 101 Prospect Avenue, N.W. Cleveland, OH 44115-1075	Environmental Counsel The Sherwin-Williams Company
President Alcan Aluminum Corporation* 100 Erieview Plaza, 29th Floor Cleveland, OH 44114	Senior Counsel Alcan Aluminum Corporation 6060 Parkland Blvd. Mayfield Hts., OH 44124

840570004

<p>President Ashland Chemical Company* P.O. Box 2219 Columbus, OH 43216</p>	<p>Senior Litigation Counsel Ashland Chemical Company 5200 Blazer Parkway Dublin, OH 43017</p>
<p>Chief Executive Monsanto Company 800 N. Lindbergh Blvd. St. Louis, MO 63167</p>	<p>Assistant Environmental Counsel Monsanto Company</p>
<p>President Benjamin Moore & Co.* 51 Chestnut Ridge Road Montvale, NJ 07645</p>	<p>General Counsel Benjamin Moore & Co.</p>
<p>Chairman E.I. du Pont de Nemours and Company 1007 Market Street Wilmington, DE 19898</p>	<p>Corporate Counsel E.I. du Pont de Nemours and Company</p>
<p>Vice President of Operations 360 North Pastoria Environmental Corp. 1100 Ridgeway Avenue Rochester, NY 14652-6280</p>	
<p>President Eastman Kodak Company 343 State Street Rochester, NY 14650</p>	<p>General Counsel Eastman Kodak Company</p>
<p>President Bayer Corporation 100 Bayer Road Pittsburgh, PA 15205-9741</p>	<p>General Counsel Bayer Corporation</p>
<p>President Otis Elevator Company* North American Operations 10 Farm Springs Road Farmington, CT 06032</p>	<p>General Counsel Otis Elevator Company</p>
<p>President Public Service Electric & Gas Company* P.O. Box 570 Newark, NJ 07101-0570</p>	<p>General Environmental Counsel Public Service Electric & Gas Company</p>

840570005

President Lucent Technologies, Inc. 600 Mountain Avenue Murray Hill, New Jersey 07974	Ralph McMurry, Esq. Hill, Betts & Nash LLP 1 Riverfront Plaza, Suite 327 Newark, NJ 07102-5401
President Alliance Chemical, Inc. Linden Avenue Ridgefield, New Jersey 07657	Fredi L. Pearlmutter, Esq. Cooper, Rose & English, LLP 480 Morris Avenue Summit, New Jersey 07901-1527

* Indicates PRPs who have joined the Passaic River Watch Group.

Counsel: Sarah Hurley, Esq.
Robinson & Cole LLP
695 East Main Street
Stamford, CT 06904-2305

840570006

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>Mr. Alan R. Bendelius, Pres. Alliance Chemical, Inc Linden Avenue Ridgefield, NJ 07657</p>	<p>B. Received by (Printed Name)</p>	<p>C. Date of Delivery</p>
<p>2. Article Number 7001 0360 0000 1582 0089 <i>(Transfer from service label)</i></p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
	<p>3. Service Type</p> <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

840570007

JAMES J. McMAHON
CHAIRMAN
DOMINIC W. CUCCINELLO
VICE CHAIRMAN
SERVINO T. FERRAPATO
BENJAMIN W. GORDON
SAMUEL L. FISER
COMMISSIONERS

PASSAIC VALLEY SEWERAGE COMMISSIONERS
700 BROAD STREET
NEWARK, N. J. 07102

SEYMOUR A. ROBERTS
SP. ASSESSOR
THOMAS E. JEROME
ATTORNEY
MRS. CHARLES J. SCHWARTZ
SECRETARY

June 26, 1988

Pfister Chemical, Inc.
Alliance Division
33 Avenue P
Newark, New Jersey 07105

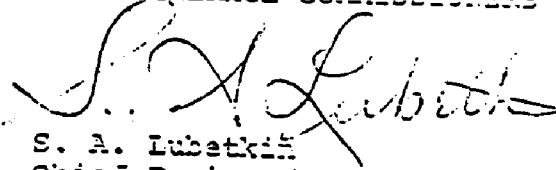
Gentlemen:

This is to inform you that polluting material in the Passaic River has been traced to your plant. The discharge of this material violates New Jersey Statutes on water pollution and you are hereby directed to cease polluting at once.

Please inform the Commissioners by return mail as to what you are doing to halt this pollution and a time schedule indicating when the pollution will be eliminated.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS


S. A. Lubetkin
Chief Engineer

SAL/kz

Certified Mail

cc: Commrs. Gordon and McMahon
Messrs. Andolino, Barcellona,
Cuccinello, and Goldberg

WEEKLY RESUME

Cards made ✓
Board up to
date ✓

5/21/79 - 5/25/79

Follow
up

5/21/79 Tomaro/Mc Laughlin
INDUSTRIAL ELECTRIC SERVICE CO.
259-263 Goffle Road
Hawthorne

Violation/Elimination - 4" pipe sealed -
wash solution collects in pit and pumped
into sanitary sewer

INSP.

5/21/79 Cordasco/Parr
MOUNTAIN SIDE HOSPITAL
Bay Ave. & Highland Ave.
Glen Ridge

Greenish colored substance observed
emanating from 18" outlet into Third
River - traced to hospital - coming
from hospital storm sewer and entering
Third River

INSP.

5/22/79 Fiore/Colello
ALLIANCE CHEMICAL INC. ✓
33 Avenue P
Newark

Special

Routine inspection found a ph of 1 -
which is entering sanitary sewer -
Contacted F. D'Ascensio, Industrial
Department, who will take over from
here

Report
of 7/19

5/22/79 Cordasco, Parr, Cupo
WASHINGTON STREET
Orange

Special - meeting held - reference to
construction of new storm line -
during construction, flow to be diverted
to sanitary line

INSP.

5/23/79 Sventy/De Marco
REECHAM INC. ✓
65 Industrial So. Clifton
Another problem - Found
violation

while

Violation/Elimination - Heavy rains
carried runoff from dumpster into yard
catch basin thence Mc Donald Brook -
area cleaned

INSP.

5/23/79 Fiore/Colello
ALEXACRAFT IND.
527 Avenue P
Newark

at this company -
Special - Routine inspection revealed
55 gallon drums in Plum Creek -
Drums were inspected by state agencies -
and are to be taken away

Follow
up

5/23/79 Tomaro/Mc Laughlin
REDMOND INDUSTRIES
1901 rte. 209
Fairlawn

Violation/Elimination - Waste line
is now connected into sanitary sewer

Called

5/23/79 Sventy/De Marco
SCEP PROS. CHEMICALS
Styertown Rd.
Clifton

Suds mixed with rain water flowing from
property - sample polluting

Called

5/23/79 Parr/Cordasco
WEASEL BROOK
Clifton

Violation/Elimination - Sudsy foam
along south bank of brook - sample
polluting

INSP.

5/24/79 Perrepatto/Fleming/Cupo
CONTINENTAL CHEMICAL CO. ✓
270 Clifton Blvd.
Clifton

Violation/Elimination - This company
was the cause of Weasel Brook pollution -
Heavy rains carried shampoo base -
from property to street storm drain
thence Weasel Brook