

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

Report of Inspection

ECRA Case #88695

Date of Inspection 9/8/88

Inspection Category: Preliminary

Inspector: Mark Mayer

Industrial Establishment: Ashland Chemical Co.

Location: 221 Foundry Street
Newark City, Essex County

Individuals Involved: T.A. Goodwin, R.M. Anderson; Ashland
T.M. Gates; Consultant
Isadore E. Rubin, P.E.
Christopher Marraro, Esq.

NARRATIVE DESCRIPTION

The property is located at the southwesterly corner of the intersection of Foundry Street and Avenue P. The surrounding area contains dispersed industrial facilities. The Ashland facility is a chemical distributor terminal, where a variety of chemical products received by train and truck tankers are transferred to above ground storage tanks, and either repackaged in drums, or again shipped out in rail or truck tankers.

The terminal is divided into 2 parcels by the New Jersey Turnpike, which passes by high above the facility. An underpass allows rail and other vehicle traffic to pass between the two parts of the site. Ashland has filed an Initial Notice early in anticipation of a proposed turnpike widening, which will result in the razing of the entire western parcel, and part of the eastern parcel of the facility. Ashland proposes to raze the entire site, and reconstruct a consolidated, modern facility on what will remain of the eastern parcel. The nature of the operations of the new facility will be as at present. At the time of inspection, only 1 of 12 storage tanks on the western parcel were in use, and many tanks on the east parcel were also permanently idle.

The bulk of the site is unpaved, including the floors within the tank farm dikes. These floors are heavily stained and ponded, as are adjacent loading/unloading areas. The submitted Sampling Plan acknowledges that soil and ground water across the site is grossly contaminated, and identifies most significant contributions to this contamination. Others identified during the site inspection are listed under "Deficiencies Noted" below.

I arrived on-site at 10:30 a.m. There was a presentation in the Main Office covering the information presented above. We then inspected the entire site. I departed at 1:10 p.m. following a brief discussion back at the Main Office.

DEFICIENCIES NOTED

1. Underground Storage Tanks

The Site Evaluation Submission, Item 6.C., states four underground storage tanks were removed prior to May 7, 1986. However, Section 3.2.9 on page 46 of the Sampling Plan states that a fuel oil tank near the fire booster pump house in the southeasterly quadrant of the property is the only underground tank known to have existed. The following evidence of underground storage tanks was noted during the inspection:

- a) A pulled tank stored along the southerly property line on the east parcel;
- b) a pulled tank stored along the east wall of the "200 series" (westerly parcel) tank farm;
- c) what appeared to be a tank vent pipe on the easterly side of the pump house, building 11, on the east parcel.

2. Rail & Truck Transfer Areas

The following additional areas were noted during the inspection which are not depicted on Figure 17 of the Sampling Plan:

- a) Staining was noted on the soil surrounding a fuel oil pump located outside the northwest corner of the dike around tanks 151-153, in the southeasterly corner of the site.
- b) Staining was noted all along the railroad siding along the southerly property line of the east parcel. It was stated that this location was used for transfers from rail to truck tankers.
- c) Staining was noted on the soil between track #2 and the covered platform, and on the wall of the platform abutting the east side of the turnpike embankment, south of building 12. It was stated that truck tanker unloading and drumming occur on this platform.

3. Above Ground Tank Farms

- a) In the area of the removed tank farm in the northeast quadrant of the site, just north of building 2, there exists a diked elevated vertical tank labelled fuel oil which is not shown on any figures submitted.
- b) In the area of the removed tank farm adjacent to the fire booster pump house, building 17, in the southeast quadrant of the site, what appeared to be a sump was noted. The sump was a buried drum filled with water.

4. Drum Filling and Storage Rooms

The Sampling Plan calls Buildings 4 and 12 areas of "limited potential environmental concern" due to being enclosed, covered, and having impermeable floors. It was noted during the site inspection that pit trenches within these buildings have dirt floors, including the area in Building 12 where drumming takes place, and there is a high likelihood of spillage.

5. Miscellaneous

- a) West of the "200 Series" tank farm is an open parcel which at the time of the inspection contained parked tanker trailers, and a couple of removed above ground tanks coated with a deteriorated insulation which may contain asbestos. Discrepancies exist as to the amount of this parcel owned or used by Ashland. Most figures submitted show this area to be approximately 0.8 acres. Attachments 5A and B of the SES, however, reference only a 0.1 acre area.
- b) Extensive areas of deteriorated insulation was noted on pipes, tanks (see "a" above), and in the boiler room in the southwest corner of the drum room, Building 19, located on the west parcel. The consultant stated that all insulation has been assumed to potentially contain asbestos.
- c) The boiler room noted in item "b" contains a floor drain, the discharge point of which is unknown.

ACTIONS REQUIRED ON THE PART OF THE APPLICANT

1. Underground Storage Tanks

Ashland's next submittal required by BEECRA shall include a clarification of the discrepancy regarding the number and location of underground tanks which exist or existed on-site. Include the source of the pipe/vent, item c.

- 2 thru 4. The location and extent of these additional areas of concern shall be shown on figures included with future submittals. Sampling and cleanup of these areas shall be conducted in accordance with written guidance to be provided by the NJDEP guidelines.

5. Miscellaneous

- a. Ashland's next submittal shall include a clarification of the discrepancy regarding the configuration of the westerly boundary of lands owned or utilized by Ashland.
- b. In that razing of the site will be done in conjunction with soil and ground water remedial activities, proper decontamination and disposal of structures and appurtenances, including, but not limited to such issues as asbestos containing material, shall be

addressed in any approvable Cleanup Plan. This shall require the identification of the location and quantity of asbestos containing material, collection and analysis of interior wipe and/or sediment samples for waste classification, etc. The name of the approved asbestos contractor shall be submitted to this office.

- c. Ashland's next submittal shall identify the location of the discharge point of the boiler room floor drain.

ACTIONS REQUIRED ON THE PART OF BEECRA

1. Review Sampling Plan; provide written comments upon completion of review.

Inspector/Case Manager Signature

Mark Mayer

Approved:

Elin Kier

, Supervisor

Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment

ANNUAL REPORT

by

Chief Engineer
S. A. LUBETKIN

to the

**PASSAIC VALLEY
SEWERAGE COMMISSIONERS**

FOR THE YEAR

1971

Violation & Elimination-Armour Industrial (continued)

Mr. Lubetkin confirmed Mr. Perrapato's visit and directive to halt pollution at once, in a letter to the company dated April 12, 1971.

Subsequent inspections by the river inspector during the entire week disclosed no further discharge.

On May 28, 1971, Mr. Gall wrote to Mr. Lubetkin, informing him that the tests referred to, only occur at five year intervals and that in the future all water from such tests shall be put into the sanitary sewer.

Violation & Elimination-Artic Ice and Fuel Co., 158 Semel Avenue, Garfield, New Jersey
February 17, 1971 (J. Perrapato)

Oil in Fleischer's Brook was traced to a catch basin on Semel Avenue, Garfield, by Inspector J. Perrapato. Investigation revealed that the oil had come from the tanks of the above company. On February 22, Mr. Lubetkin wrote to the company directing them to clean the catch basin before the oil was washed into the stream and to do whatever else was necessary to keep the oil from reaching the catch basins again. A copy of the letter was sent to the City of Garfield, with an accompanying letter, stating that since the catch basin is owned by Garfield, they are responsible to see that it is cleaned. Farfield did clean the catch basin in early March, 1971.

On March 2, 1971, the Commissioners received a reply from the company explaining that the oil spill was caused by vandals, who had broken into their property and pulled plugs from oil trucks. They also explained that this incident was reported to the Garfield police, which are now patrolling the plant.

Violation & Elimination-Ashland Chemical Company, 221 Foundry Street, Newark, New Jersey.
May 17 to June 11, 1971 (J. McLaughlin)

On May 17, 1971, Inspector J. McLaughlin sampled washings from this company, entering into the Roanoke Avenue Storm Sewer at Avenue P. Analysis of this sample indicated it was not only highly polluting, but contained flammable and explosive materials. The company was notified by Mr. Lubetkin on May 26, (copy to the City of Newark) to cease pollution at once, and they were warned against discharge to the sanitary sewer without proper pretreatment. Mr. M. Elias, Jr., District Manager, replied on May 28, informing that plans to permanently correct this situation were in the Engineering Department and would be sent to the Commissioners within two weeks. In the interim period, they would catch their liquid waste and have it disposed of by a reputable scavenger.

Violation & Elimination-Ashland Chemical Company, (continued)

Subsequent samples were bad, so Mr. Lubetkin telephoned Mr. Elias and was informed that the matter would be checked. In a letter dated June 11, Mr. Elias stated that the objectionable samples were caused by two outside tank wagon firms who pick up at the Ashland facilities. The outside trucking firms have been notified to cease this practice at once.

Mr. Elias met with Mr. Lubetkin and submitted plans to connect to the Newark sewer system through an oil separator system. Mr. Lubetkin informed them that the Commissioners had no objection to the system, but the City of Newark has final say on any connection of its system..

Inspection by the Commissioners' inspectors indicates that all truck washing operations have ceased at this location, pending the new sewer connection, thus the violation is eliminated.

As of the end of the year, the oil separator system has not been installed.

Three Violations & Eliminations-Atlantic Chemical Corporation, 10 Kingsland Road, Nutley, New Jersey .
April 13, 1971

(D . Miele, Jr.)

On April 13, about 12:50 P.M., this company received a delivery in a sealed Sea-Land container containing a cargo of 30-gallon steel drums containing water dispersable liquid pigment (yellow). When the seal was broken and the door opened, liquid material poured out and covered the ground, running in to the storm sewer. Investigation revealed that approximately 10 drums or 300 gallons of this pigment reached the ground. Three workers dipped up some material and washed some with a fire hose into the storm sewer. In reply to a letter sent to this company concerning this matter, management claims that as soon as they learned of the situation, they halted the hose-down and the remaining material was absorbed with saw-dust and sand and removed. Personnel were directed by management, that in the event of future spills, dry clean-up methods must be used and they claim a substantial supply of absorbent material is now readily accessible to that area.

August 11-13

(D. Miele, Jr.)

The heavy rains of August 11 washed red dye into 3rd. River. Mr. D. Zinger was told by Inspector D. Miele, Jr. to clean yard area, so that future rains will not pollute the river. Mr. Miele reported this was completed on Friday, August 13, 1971.

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SEYMOUR A. LUBETKIN
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CHARLES C. CARELLA
CHIEF COUNSEL

MRS. CHARLES T. SCHAEDEL
CLERK-TREASURER

June 15, 1976

009-315

Raymond Nesto
Manager Division of Sewers
20 Park Place
Newark, New Jersey 07102

Dear Mr. Nesto:

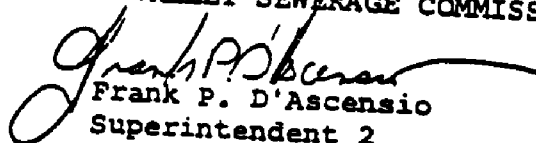
This letter is in reference to a pollution of the Passaic River which occurred on May 6, 1976 and which was caused by the Ashland Chemical Company, 221 Foundry Street, Newark, New Jersey. On that date a PVSC Inspector found personnel pumping material out of a catch basin on Avenue P. This catch basin flows into the Roanoke Avenue Storm Sewer, thence to the Passaic River. A sample which was analyzed by the PVSC Laboratory, was highly flammable and potentially explosive.

It appeared that the dangerous material came from the tank truck wash area where the tank trucks were brought for steam cleaning. Spills occurred when drivers disconnected hoses which had been connected from the steam cleaning equipment to the truck. This material then flowed into the catch basin thence Roanoke Avenue Storm Sewer.

Although Ashland Chemical is in the process of installing preventative measures you are hereby put on notice that this company has in the past allowed a flammable chemical to enter the City of Newark's Roanoke Avenue Storm Sewer.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS


Frank P. D'Ascensio
Superintendent 2

FPD:rv

Certified Mail

cc: S.A. Lubetkin
E. Moller

APR 26 1996

GENERAL NOTICE LETTER
URGENT LEGAL MATTER
EXPRESS MAIL - RETURN RECEIPT REQUESTED

Mr. David J. D'Antoni, President
Ashland Chemical Company
P.O. Box 2219
Columbus, OH 43216

Re: Diamond Alkali Superfund Site
Notice of Potential Liability for
Response actions in the Passaic River Study Area

Dear Mr. D'Antoni:

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"). By this letter EPA is notifying Ashland Chemical Company ("Ashland") of its potential liability relating to the Site pursuant to Section 107 of CERCLA.

Sediment in the Passaic River contain numerous hazardous substances, pollutants and contaminants. Investigations undertaken by EPA indicated that hazardous substances were being released from the former Ashland facility located at 221 Foundry Street 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, Ashland may be potentially liable for all response costs which the government may incur relating to the Passaic River Study Area.

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

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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 materials 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.

While EPA has the discretionary authority to invoke special notice procedures, EPA hereby notifies you that it will not utilize the special notice procedures contained in Section 122(e) of CERCLA, 42 U.S.C. §9622(e). EPA has concluded that use of the special notice procedures in Section 122(e) of CERCLA would delay the implementation of any RI/FS which is currently being performed at the Site to determine the extent of contamination and to evaluate possible actions to mitigate any adverse effects. EPA will determine at a subsequent time whether additional measures are required to mitigate releases from the Site in order to protect the public health, welfare, and the environment. The decision not to use the special notice procedures does not preclude you from entering into discussions with EPA regarding your participation in activities at the Site.

By this letter, EPA encourages you, as a PRP, to voluntarily participate in the EPA-approved activities underway at the Passaic River Study Area in conjunction with other PRPs. At the present time, the Occidental Chemical Corporation ("OCC") is performing an RI/FS at the Site under an Administrative Consent Order. OCC, through a successor, Maxus Energy Corporation, 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. Be advised that notice of your potential liability at the Site is being forwarded to OCC by EPA.

EPA requests your cooperation in this matter. If you are interested in participating in the ongoing response action you should notify EPA of your intentions to join with OCC. Notification should be in writing and should be delivered to EPA no later than fourteen (14) days after the date that you receive

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this letter. Your letter should be sent to:

Lance R. Richman, P.G.
U.S. Environmental Protection Agency
Emergency and Remedial Response Division
290 Broadway, Floor 19
New York, NY 10007-1866,

with a copy to Ms. Amelia Wagner, Esq., of the Office of Regional Counsel at the same address.

If EPA does not receive a written response from you in the time specified above, EPA will assume that you voluntarily decline to participate in any of the response actions taking place at the Site. EPA reserves the right to pursue its available enforcement options with regard to the site.

If you wish to discuss this matter further, please contact Mr. Lance R. Richman, P.G., of my staff at (212) 637-4409 or Ms. Wagner at (212) 637-3141. Please note that all communications from attorneys should be directed to Ms. Wagner.

Sincerely yours,

Kathleen Callahan, Director
Emergency and Remedial Response Division

Attachment

CC: Mr. Stephen W. Leermakers
Senior Litigation Counsel
Ashland Chemical Company

Ms. Carol Dinkins, Esq.
Vinson & Elkins, L.L.P.

Mr. Richard P. McNutt
Maxus Energy Corporation

bcc: A. Wagner, ORC-SUP

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ATTACHMENT

Contact for Maxus Energy Corporation:

Mr. Richard P. McNutt
Maxus Energy Corporation
1015 Belleville Turnpike
Kearny, New Jersey 07032

Counsel: Ms. Carol Dinkins, Esq.
Vinson & Elkins, L.L.P.
3700 Trammell Crow Center
2001 Ross Avenue
Dallas, Texas 75201-2916

PRPs in receipt of Notice Letters:

Mr. J. Roger Hirl
President and Chairman of the Board
Occidental Chemical Company
Occidental Tower
5005 LBJ Freeway
Dallas, Texas 75244

Brian C. Kelly, Esq.
Chris-Craft Industries, Inc.
600 Madison Avenue
New York, New York 10022

Counsel: Peter Simshauser, Esq.
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300 South Grand Avenue
Los Angeles, California 90071-3144

Mr. Robert D. McNeeley, President
Reilly Industries, Inc.
1510 Market Square Center
151 North Delaware Street
Indianapolis, IN 46204

Counsel: Jacqueline A. Simmons, Esq.
Reilly Industries, Inc.

Mr. John G. Breen, Chairman of the Board
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-1075

Counsel: Donald J. McConnell, Esq., Environmental Counsel
The Sherwin-Williams Company

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Robert L. Ball, President
Aluminum Corporation
Grievance Plaza, 29th Floor
Cleveland, OH 44114

Counsel: Lawrence A. Salibra II, Esq., Senior Counsel
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6060 Parkland Blvd.
Mayfield Hts., Ohio 44124

David J. D'Antoni, President
Ashland Chemical Company
P.O. Box 2219
Columbus, OH 43216

Counsel: Stephen W. Leermakers, Esq., Senior Litigation Counsel
Ashland Chemical Company
5200 Blazer Parkway
Dublin, Ohio 43017

Mr. Richard J. Mahoney, Chief Executive
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

Counsel: Peter H. Smith, Esq., Assistant Environmental Counsel
Monsanto Company

Mr. Maurice C. Workman, President
Benjamin Moore & Co.
51 Chestnut Ridge Road
Montvale, New Jersey 07645

Counsel: John T. Rafferty, Esq., General Counsel
Benjamin Moore & Co.

Mr. Edgar S. Woolard, Jr., Chairman
E.I. du Pont de Nemours and Company
1007 Market Street
Wilmington, Delaware 19898

Counsel: Bernard J. Reilly, Esq., Corporate Counsel
E.I. du Pont de Nemours and Company

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RICHARD F. IGLAR*

*ALSO ADMITTED IN N.Y.
**ALSO ADMITTED IN D.C.
***ALSO ADMITTED IN PA.
****ADMITTED IN MA. ONLY

January 28, 1994

ENVIRONMENTAL PROTECTION
AGENCY, REGION II
1994 JAN 31 PM 1:42
EARD SITE COMPLIANCE
BRANCH

FEDERAL EXPRESS

Mr. Lance R. Richman, P.G.
Emergency & Remedial Response Division
U. S. Environmental Protection Agency
26 Federal Plaza, Room 13-100
New York, NY 10278

Re - Request For Information
Diamond Alkali Superfund Site,
Passaic River Study Area

Dear Mr. Richman:

This letter refers to the Request for Information that was sent to Alliance Chemical, Inc. ("Alliance") dated December 16, 1993 with respect to the Diamond Alkali Superfund Site, Passaic River Study. Alliance has received an extension of time until January 28, 1994 to respond to the Request for Information.

Enclosed are the responses of Alliance. Alliance reserves the right to supplement its answers if additional information becomes available.

Please be advised that Roger Huth is no longer with the company and Richard E. Braun, Vice President, Operations, should be the contact for the company. Inquiries and correspondence from attorneys should be directed to this firm.

Very truly yours,


Fredi L. Pearlmutter

FLP/bjw
Enclosures
cc: Richard E. Braun
Patricia Hick (w.o. encl.)

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RESPONSE OF ALLIANCE CHEMICAL, INC.
TO
REQUEST FOR INFORMATION

Re: EPA Request for Information Dated December 16, 1993
Under 42 U.S.C. §9801 at seq. Diamond Alkali Superfund
Site, Passaic River Study

General Objection

Alliance Chemical, Inc. ("Alliance") is a wholly-owned subsidiary of Pfister Chemical, Inc. ("Pfister"). In 1965, Pfister acquired the stock of Alliance Chemical Co., Alliance Color & Chemical Co. and Plum Point Realty Corp., which owned and/or operated the site located at 309-327 Avenue P in Newark, NJ (the "Acquisition"). In June 1968, Alliance Chemical Co. and Plum Point Realty were merged into Alliance Color and Chemical and the name was changed to Alliance Chemical, Inc.

Alliance can and will respond to the questionnaire relating to the site located at 33 Avenue P in Newark, New Jersey for the time period subsequent to the Acquisition in 1965. Although Alliance will provide answers to the questionnaire with respect to information in its possession prior to that time period, Alliance cannot answer and is not answering on behalf of any of the predecessor corporations.

EPA describes the chemicals 2-chloro-1, 4-diethoxy-5-nitro benzene and 5-chloro-2, 4-dimethoxyaniline as hazardous substances. These substances are not defined as hazardous substances pursuant to §101.14 of CERCLA, 42 U.S.C. §9601 (14),

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or §1004 of RCRA, 42 U.S.C. §6903, and therefore Alliance objects to their characterization by EPA as hazardous substances. Nevertheless, where EPA has requested information specifically with respect to those compounds, Alliance is providing information on the basis that these substances are not hazardous substances.

QUESTIONS

1) During what years did your company operate at the facility designated above?

1965-Present.

2) Does your company have a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq. If your company has an EPA Identification Number, state it in your answer to this question.

Alliance's EPA ID Number is: NJD 045 794 791.

3) Did your company receive, utilize, manufacture, discharge, release or dispose of any materials containing the following substances:

Subject to the General Objection, Alliance responds as follows:

2,3,7,8 tetrachlorodibenzo-p-dioxin

or other dioxin compounds

no

2-chloro-1,4-diethoxy-5-nitro benzene

yes

5-chloro-2,4-dimethoxyaniline

yes

2-chloro-1,4-diethoxy-5-nitro benzene was manufactured at Alliance from 1965 to 1985.

5-chloro-2,4-dimethoxyaniline was manufactured at Alliance from 1976 until 1987.

4a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or

byproduct.

Alliance objects to this question as overly broad and unduly burdensome and seeks information which is not relevant. There may be some hazardous substances generated as by-products which are unknown.

Subject to these objections and the General Objection:

2-Chloro-1,4-diethoxy-5-nitro benzene, which is neither a CERCLA hazardous substance nor a RCRA hazardous waste, was manufactured by nitrating 2-chloro-1,4-diethoxy benzene in an aqueous system with 67% nitric acid. The product was isolated by filtration from the aqueous system and further reacted with morpholine to make a 2,5-diethoxy-4-morpholino nitro benzenene. The aqueous filtrate from the nitration was neutralized and combined with other process effluent prior to discharge. Both starting material and product are water insoluble.

5-Chloro-2,4-dimethoxyaniline, which is neither a CERCLA hazardous substance nor a RCRA hazardous waste, was manufactured from 5-nitro-1,2,4-trichlorobenzene. First, 5-chloro-2,4-dimethoxy nitrobenzene was made by the addition of a mixture of sodium hydroxide and methanol to 5-nitro-1,2,4-trichlorobenzene in methanol at reflux. The methanol was then distilled off and recovered for reuse and a mixture of sodium sulfide and sulfur (polysulfide) was added at reflux to reduce the nitro compound to the final product which, after cooling, was isolated by filtration from the aqueous reaction mixture. The filtrate was neutralized and discharged to the Passaic Valley Sewerage

Commission ("PVSC"), a POTW, along with other process effluent. The product was purified by dissolving in aqueous hydrochloric acid adding carbon for decolorization, clarifying and precipitating with caustic to a neutral pH. The filtrate was discharged to our effluent system which goes to PVSC. The carbon clarification cakes were disposed of in a chemically secure landfill with other clarification press cakes.

2-Methoxy-5-nitro benzenamine was manufactured from 1965 to around 1980 in the same manner as 5-chloro-2,4-dimethoxyaniline except the starting material was 2,4-dinitro chlorobenzene.

3,3'-Dimethoxy benzidine was manufactured from 1965 to around 1970 starting with o-nitro anisole. An alkaline zinc reduction to the hydrazo compound followed by a benzidine rearrangement produced the desired compound.

3,3'-Dimethyl benzidine was manufactured from 1965 to around 1970 starting with o-nitro toluene. An alkaline zinc reduction to the hydrazo compound followed by a benzidine rearrangement produced the desired compound.

Zinc compounds (manufactured from 1965-1970). Alliance manufactures light-sensitive diazo compounds which are stabilized as the zinc salt. 2-Chloro-1,4-diethoxy-5-nitro benzene described above is condensed with morpholine to yield 2,5-diethoxy-4-morpholino nitro benzene. This compound is then reduced in hydrochloric acid to the amine with zinc dust. The amine is then diazotized with sodium nitrite and the zinc stabilized diazo compound precipitated. The final product is

2,5-diethoxy-4-(4-morpholinyl)-benzenediazonium
tetrachlorozincate (2-)(2:1). The dibutoxy compound is
manufactured in the same way.

Zinc Carbonate and zinc hydroxide are currently produced as
part of Alliance's zinc recovery process where the insoluble zinc
compounds are precipitated from the effluent at an alkaline pH
with caustic soda or soda ash.

Upon information and belief, some of these compounds may
have been manufactured at this facility before Alliance acquired
it.

b) During what parts of the manufacturing processes identified
in the response to items (4)(a), above, were hazardous
substances, including, but not limited to, the substances listed
in item (3), generated? Describe the chemical composition of
these hazardous substances. For each process, what amount of
hazardous substances was generated per volume of finished
product? Were these hazardous wastes combined with wastes from
other processes? If so, wastes from what processes?

Subject to the General Objection, all of the products listed
in 4a) above except for the zinc carbonate, zinc hydroxide and 2-
chloro-1,4-diethoxy-5-nitro benzene were purified by dissolving
the product in acid, treating the solution with activated carbon
to remove color and reprecipitating the product. These carbon
clarification press cakes which contained small amounts of
product were collected and disposed of as solid waste. In
addition, the processes which produced the 3,3'-dimethoxy
benzidine and 3,3'-dimethyl benzidine produced a zinc oxide
slurry as a by-product from the alkaline zinc reduction. This
zinc oxide slurry was recovered and sent out to be recycled.

All carbon clarification press cakes were combined prior to

1988. After 1988, the light-sensitive diazo carbon clarification cakes were kept separate and disposed of as hazardous waste because they contained borderline quantities of cadmium which came from impurities in the zinc which was used for reduction.

See also responses to Questions 7a and 10.

5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3). Include information on the following:

Alliance Chemical objects to this question as overly broad and unduly burdensome and to the extent it requests information with respect to off-site storage, transportation and disposal, the request is not relevant. Subject to these objections and the General Objection, Alliance responds as follows:

- a) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

From 1970 until 1977 all solid waste was hauled off-site by:

D&J Trucking
310-336 Avenue P
Newark, NJ 07105

From 1978 until the present, hazardous waste has been manifested and disposed of pursuant to applicable hazardous waste regulations. See Annual Hazardous Waste Reports and manifests attached.

From 1978 until the present all RCRA non-hazardous clarification press cakes were disposed of at chemically secure landfills by various haulers (see manifests and bills of lading). Alliance discontinued using manifests at the request of NJDEPE

for non-hazardous wastes. Haulers used were:

R&R Sanitation Service
Randolph, NJ 07869
to SCA Chemical Services
Pinewood, SC

Wayne Disposal
49350 N. Service Drive
Belleville, MI 48111

Waste Conversion
2869 Sandstone Drive
Hatfield, PA 19440

- b) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

Alliance objects to this question to the extent it requests information with respect to off-site storage as irrelevant. Subject to this objection and the General Objection, Alliance responds as follows:

Most of the hazardous substances handled at Alliance over the years are raw materials. All hazardous substances are handled in accordance with applicable federal and state

regulations. Bulk items such as solvents, acids and alkalies are stored in diked tanks. Drum and bagged raw materials are stored in the warehouse or under an outside shed. Products that are classified as hazardous materials are stored in the warehouse, or in a cold room in the warehouse, or in a refrigerated container. Hazardous clarification press cakes or waste oil are stored in designated staging areas in the warehouse. From 1965-1970, a by-product stream of zinc oxide-water slurry recovered from the 3,3'-dimethoxy benzidine and 3,3'-dimethyl benzidine process was stored in 2 areas prior to shipping out for recycling. The first area was three agitated tanks adjacent to the manufacturing area and the second was a concrete lined above ground storage bin.

6a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3), did the waste stream connect to a sanitary sewer and if so, during what years? Were they treated before being discharged to the sanitary sewer and if so, how? If the waste waters were not discharged to the sanitary sewer, where did they discharge and during what years?

Subject to the General Objection, Alliance responds as follows:

The process effluent waters discharged from the facility were not hazardous under RCRA because they were not a characteristic waste, nor did they come from a listed process; nor were there listed materials dumped into the effluent. Therefore, the effluent stream was not hazardous. The process effluent was connected to the PVSC sanitary sewer system from 1970 on. From 1965 to 1970, the process effluent discharged to a drainage ditch (Plum Creek) which flowed to the Passaic River.

Prior to discharge the effluent was neutralized.

b) For floor drains or other disposal drains at the facility, did the waste stream connect to a sanitary sewer and if so, during what years? Were they treated before being discharged to the sanitary sewers and if so, how? If the floor drains or other disposal drains were not discharged to the sanitary sewer, where did they discharge and during what years.

Floor drains were combined with process effluent and treated as in a) above.

c) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so during what years? If catch basins or lagoons existed, were they lined or unlined? Where was the discharge of any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years?

Since Alliance has operated the facility, storm sewers and catch basins have always existed at the facility. Most of the discharges are combined with the process effluent and treated as in a) above. An unlined lagoon existed from 1965 until 1979 and was part of the effluent system which was neutralized prior to discharge. From 1965 until 1970, as part of the effluent system, the lagoon discharged to the drainage ditch as explained in a) above. From 1970 until 1979 the lagoon discharged to the sanitary sewer system (PVSC).

d) Please supply diagrams of any waste water collection or disposal systems on the property.

See attached diagrams showing the lagoon discharging to the drainage ditch prior to 1970, and to PVSC from 1970 until 1979, and the present day system.

7a) For each hazardous substance, including, but not limited to, the substances listed in item (3), identified in the response to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.

Alliance objects to this question as vague, overly broad and unduly burdensome. There may be some hazardous substances generated as by-products which are unknown. Alliance further objects to the characterization of its products as hazardous substances generated during operation of the facility.

Subject to these objections and the General Objection, Alliance responds as follows: (All numbers approximate on an average annual basis)

2-Chloro-1,4-diethoxy-5-nitro benzene	(product)		
	'65-'85	130,000	lbs/yr
5-Chloro-2,4-dimethoxyaniline	(product)		
	'76-'87	15,000	lbs/yr
2-Methoxy-5-nitro benzenamine	(product)		
	'65-'85	80,000	lbs/yr
3,3'-Dimethoxy benzidine	(product)		
	'65-'70	200,000	lbs/yr
3,3'-Dimethyl benzidine	(product)		
	'65-'70	20,000	lbs/yr
Zinc Compounds (light-sensitiv diazos)	(product)		
	'65-'90	105,000	lbs/yr
Zinc Compounds (Fast Color Salts)	(product)		
	'65-'87	160,000	lbs/yr
Zinc Carbonate-zinc hydroxide	1992-on	25	tons/year
Zinc oxide slurry	1965-1971	120	tons/year
Non-hazardous press cakes	1965-on	50	tons/year
Hazardous press cakes	1989-1991	125	tons/year
Waste oil		5-10	drums/year

See attached documents.

b) Was any hazardous substance, including, but not limited to, the substances listed in response to item (3), identified in responses to item (4), above, disposed of in the Passaic River or discharged to the Passaic River? If yes, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred.

During the years 1965-1970, when Alliance's effluent, after

being neutralized, was discharged to the drainage ditch (Plum Creek) which leads to the Passaic River, there were occasional leaks and excursions in pH which resulted in acidic effluent being discharged. The amount and frequency of material discharged is unknown. After 1970, all effluent was discharged to the POTW (PVSC). See attached documentation.

8) Please identify any leaks or spills that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3), was released on the property of the facility or discharged to the Passaic River. Provide any documents or information relating to these incidents.

Subject to the General Objection, Alliance responds as follows:

During the period 1966 to 1970, there were some minor discharges and pH excursions in the neutralized effluent going to the drainage ditch (Plum Creek) which leads to the Passaic River. See the accompanying documentation. In 1970, when Alliance hooked up to PVSC, there were no further discharges of effluent to the drainage ditch.

9) Provide the date of any leaks or spills of any hazardous substances, including, but not limited to, the substances listed in response to item (3), on the property or into the waste water discharge system at the facility. Provide details of the ultimate disposal of any contaminated materials.

Subject to the General Objection, Alliance responds as follows:

In 1987, there was a small spill of No. 4 fuel oil on to the ground by the fuel oil tank. The contaminated earth was removed

and disposed of as hazardous waste. See accompanying documentation.

10) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

Alliance objects to this question as overly broad and unduly burdensome and to the extent it requests information with respect to off-site handling, transportation and disposal, the request is not relevant. Subject to these objections and the General Objection, Alliance responds as follows:

See accompanying documents.

11) Provide all other documents pertaining to the results of any analyses of groundwater, surface water, ambient air, and any other environmental media performed at the facility.

Alliance objects to this question as overly broad and unduly burdensome. Subject to these objections and the General Objection, Alliance responds as follows:

Alliance has entered into a Memorandum of Agreement ("MOA") with the New Jersey Department of Environmental Protection and Energy to perform a remedial investigation at its facility. No analytical information has yet been obtained under the MOA.

See also attached documentation.

12) Provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.

Upon information and belief, Alliance Chemical Co. was founded in 1947, and the company was owned by Harold Rose and Harold Coward. In 1965 Alliance Chemical Co. was acquired by Pfister Chemical, Inc. located in Ridgefield, NJ 07657. Alliance Chemical, Inc. is a wholly-owned subsidiary of Pfister Chemical, Inc. See question 13.

13) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.

Corporate matters have been held to be outside the statutory authorization set forth in CERCLA or RCRA. See United States v. Charles George Trucking Co., Inc., 624 F. Supp. 1185 (D. Mass. 1986), aff'd 823 F.2d 685 (1st Cir. 1987). Accordingly, Alliance objects to this question. Subject to this objection and the General Objection, Alliance responds as follows:

a) State the legal name of your company.

Alliance Chemical, Inc.

b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.

Alan R. Bendelius, President
Alliance Chemical, Inc.
Linden Avenue
Ridgefield, NJ

c) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey

State of Incorporation : New Jersey
Agent for Service of Process: Frank Spill
Alliance Chemical, Inc.
Linden Avenue
Ridgefield, NJ 07657

- d) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.

Alliance has been unable to locate a copy of its Certificate of Incorporation.

- e) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.

Alliance Chemical, Inc. is a wholly owned subsidiary of

Pfister Chemical, inc.
P.O. Box 15
Ridgefield, NJ 07657

Pfister acquired Alliance in 1965.

- f) Identify any predecessor organization and the dates that such company became part of your company.

Alliance Chemical Co.
Alliance Color & Chemical Co.
Plum Point Realty Corp.

The stock of the above three companies was acquired by Pfister Chemical, Inc. in 1965.

- g) Identify any other companies which were acquired by your company or merged with your company.

In June 1968, Alliance Chemical Co. and Plum Point Realty were merged into Alliance Color and Chemical, Co. and the name was changed to Alliance Chemical, Inc.

- h) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified the responses to items (11)(e), (f), and (g), above.

The request with respect to Pfister Chemical is not relevant to the scope of this inquiry. The information with respect to Alliance Chemical Co., Alliance Color & Chemical Co. and Plum Point Realty Corp. is unknown.

- i) Identify all previous owners or parent companies, address, and the date change in ownership occurred.

Upon information and belief:

Alliance Chemical Co.
Alliance Color & Chemical Co.
Plum Point Realty Corp.

were previously owned by: Harold Rose and Harold Coward (addresses unknown).

See also answers to Question 13 (f) & (g)

14) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the response. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding.

The following persons have worked together in responding to all questions and have personal knowledge of the responses:

Richard E. Braun
Vice-President, Operations
Alliance Chemical, Inc.
Linden Avenue
Ridgefield, NJ 07657
(201) 945-5400

William Henning
Plant Manager
Alliance Chemical, Inc.
309-327 Avenue P
Newark, NJ 07105

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey

County of Bergen :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

RICHARD E. BRAUN

NAME (print or type)

VICE PRESIDENT OPERATIONS

TITLE (print or type)

Richard E. Braun

SIGNATURE

Sworn to before me this
27 day of January, 1994

Geraldine Stempinski

Notary Public

GERALDINE M. STEMPINSKI
Notary Public of New Jersey
My Commission Expires Jan. 22, 1995

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