AUG 0 8 1996

Mr. Gerald Borriello
President
Automatic Electro-Plating
185 Foundry Street
Newark, NJ 07105

Re: Diamond Alkali Superfund Site
Passaic River Study Area

Dear Mr. Borriello:

Under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), as amended, 42 U.S.C. §9601 et seq., 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.

EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the Passaic River Study Area ("Study Area"), a part of the Diamond Alkali Superfund Site. Sediments in the Study Area contain numerous hazardous substances, pollutants and contaminants that present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Pursuant to CERCLA, EPA is currently overseeing a Remedial Investigation/Feasibility Study being performed at the Study Area under an Administrative Order on Consent signed by Occidental Chemical Corporation.

Pursuant to Section 104(e) of CERCLA, EPA may request information from companies about their operations in and around the Study Area. You may have already received such an Information Request letter or you may expect to receive one. In addition, Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §9606(a) and §9607(a), allows EPA to notify parties of their potential liability and request that they 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. While to date, you may not have received any notice of potential liability from EPA concerning the Study Area, this does not preclude you from receiving such a notice in the future.

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EPA has scheduled a meeting for 10:00 AM on Thursday, August 29, 1996 to provide more information about the status of work concerning the Study Area to all those parties who have either received a Notice letter or a Request for Information letter. The meeting will be held in Room 305 on the Third Floor at 26 Federal Plaza, New York, New York. A list of addressees is attached to this letter. EPA encourages you to attend this meeting.

Please be advised that security at 26 Federal Plaza is very strict and that building guards may confiscate any item they consider to be a weapon. In the past, even small pocket knives such as "Swiss Army" knives have been taken from visitors. To clear security as quickly as possible, you should use the Duane Street entrance to 26 Federal Plaza.

If you have any questions concerning this meeting, please contact either Patricia Hick, Esq., at (212) 637-3137 or Amelia Wagner, Esq., at (212) 637-3141 of the Office of Regional Counsel of EPA or Mr. Lance Richman of the Emergency Response and Remedial Division at (212) 637-4409.

Sincerely yours,

Delmar Karlen, Jr., Chief
New Jersey Superfund Branch
Office of Regional Counsel

843610002

Mr. Robert Sauer
Vice President
Active Oil Service
110 Riverside Ave.
Newark, New Jersey 07104

Mr. George Parker, President
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07920-1002

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New York, New York 10121

President
North American Smelting Co.
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843610003

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843610004

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07080

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Kleer Kast
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843610005

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02903-4306

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Environment and Safety
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Harrison, New Jersey 07029

843610007

AUTOMATIC

AUTOMATIC ELECTRO - PLATING CORP.

185 FOUNDRY STREET, NEWARK, NEW JERSEY 07105

TELEPHONE: (201) 589-0344

FAX: (201) 589-0345

1) Since 1970

2) a. NO
b. NO
c. YES

3) Boric Acid (Not a toxic chemical)
Nickel Sulfate
Zinc Chloride (Not a toxic chemical)
Chromium as a chromate solution
Nickel Anodes
Silver
Zinc Anodes (Not a toxic chemical)

4) a. Electro-plating of steel components with a Zinc or Nickel finish.

b. During the plating process the chemicals listed in question #3 were consumed by depositing the Zinc & Nickel on customers components. Any excess chemicals were rinsed off the components and discharged to the sanitary sewer after treatment as expressed in 40CFR-413-14 Sub Part A.

I. Chemicals were combined in a plating solution to allow metals to ionize and plate onto customers components.

II. Trace amounts of substances were from plating solution, are dragged into rinse water, and discharged to sewer after treatment.

III. NO

5) Rinse waters from the plating processes are piped to a collection/ sampling pit.

a. Gerald Borriello

b. George Scott

b. NONE

c. All chemicals are stored in drums, carboys, and tanks within the confines of the facility.

d. We adjust the pH of the waste water with either caustic soda or sulfuric acid to 7.0 and discharge to the sewer. There is no other waste generated.

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AUTOMATIC ELECTRO-PLATING CORP.
Newark, New Jersey

6) (A) I. YES, since 1970
II. YES. Adjusted for pH
III. NO
IV. See P.V.S.C. reports.

(B) I. YES, since 1970
II. NONE

(C) I. Two common road troughs catching runoff from the surrounding area.
II. NONE
III. NONE
IV. Unlined
V. They flood during heavy rains. (See photo's).
VI. Since facility was built in early 1900's to the best of my knowledge.

(D) I. Storm sewers and catch basins are the same. There are no lagoons.
II. NONE
III. N/A
IV. NONE

(E) See enclosed diagram.

7) (A) See List. Three (3) years average
(B) Absolutely not.

8) NONE

9) (A) YES
I. YES
II. NO
(B) See List. 2-3 year average

10) See settlement of E.P.A. action.

11) See ECRA filing.

12) N/A

843610009

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.

GERALD BORRIELLO
NAME (print or type)

C.E.O.
TITLE (print or type)

SIGNATURE

Sworn to before me this 24th day of May, 1996

Notary Public

CAROL D. TARSE
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES MAR. 3, 1997

843610010

AUTOMATIC

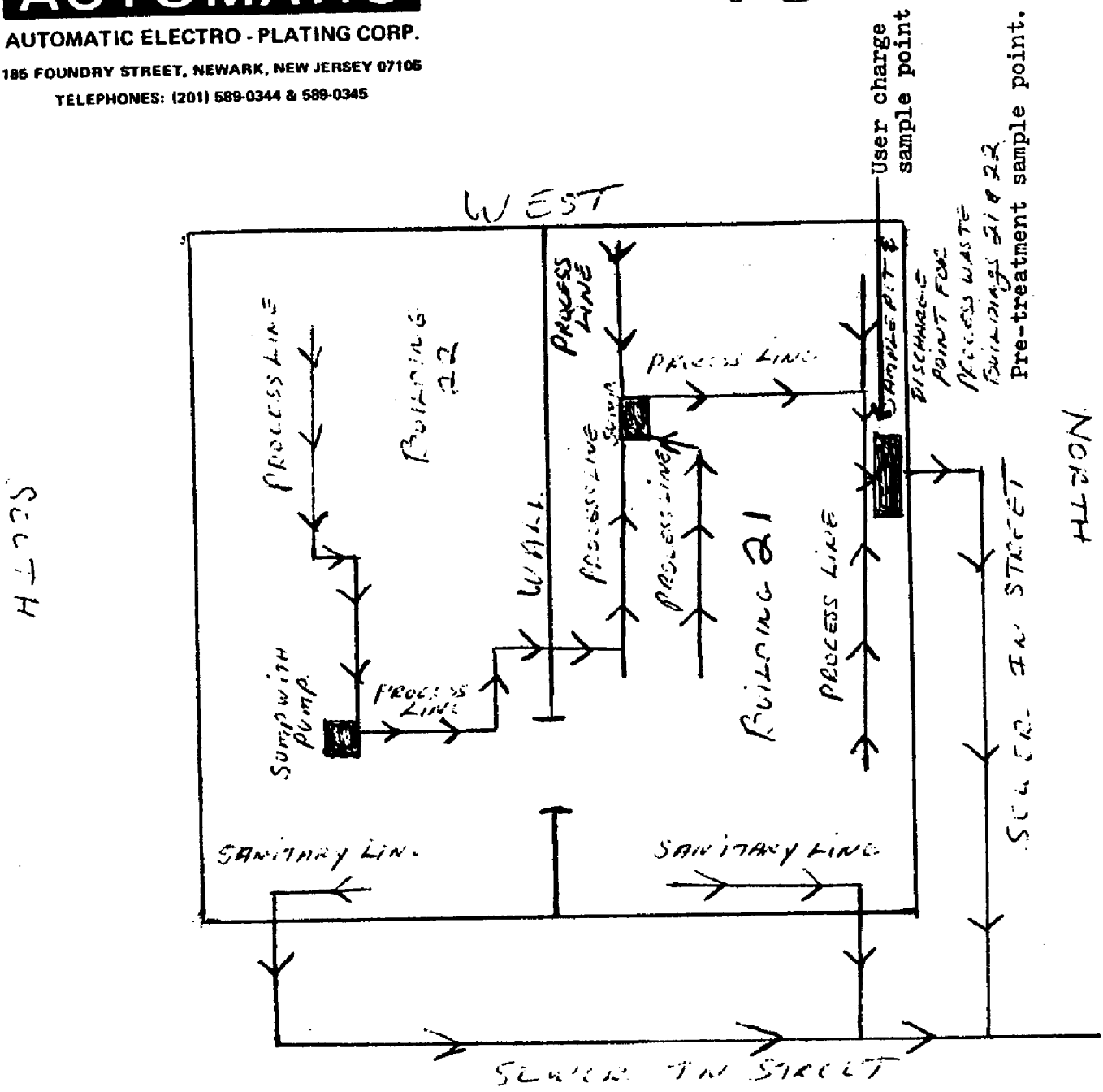
AUTOMATIC ELECTRO - PLATING CORP.

185 FOUNDRY STREET, NEWARK, NEW JERSEY 07105

TELEPHONES: (201) 589-0344 & 589-0345

SEWER LINES

6-E



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AUTOMATIC

AUTOMATIC ELECTRO - PLATING CORP.

185 FOUNDRY STREET, NEWARK, NEW JERSEY 07105

TELEPHONE: (201) 589-0344

FAX: (201) 589-0345

Pounds per year purchased -- 1994 7.A

Boric Acid	100 Lbs.
Nickel Sulfate	0
Zinc Chloride	440 Lbs.
Chromium from a chromate solution (1994)	
Luster-On 250A	450 Lbs.
Luster-On 25AB	460 Lbs.
	910 Lbs.
Nickel Anodes	250 Lbs.
Silver Nitrate	3 Lbs.
Zinc Anodes	23,000 Lbs.

843610012

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
LANCE R. MILLER, DIRECTOR
CN 028
Trenton, N.J. 08625-0028
(609) 633-1408
Fax # (609) 633-1454

RECEIVED
APR 3 1991

MEMORANDUM

TO: Linda Grayson, Chief
Bureau of Planning and Assessment

FROM: Doug Stuart, Acting Chief
Bureau of Compliance and Technical Services

SUBJECT: Responsible Party Investigation
Foundry Street Complex
(AKA Arkansas Chemical, Hummel Chemical)
185 Foundry Street, Newark, NJ

The Bureau of Compliance and Technical Services' Special Investigation Section has prepared the attached Responsible Party Investigation Summary for the subject case to assist the Bureau of Planning and Assessment in its site evaluation.

Please be advised that referenced key documents are maintained in this bureau's files. Should you have any questions in this matter, do not hesitate to contact me at (609) 633-0708.

lmc
c: Y. Yacoub, Chief, MBPO
P. Smith, Investigator, SIS/BCTS
B. Patterson, ECRA
RPIU File

843600011

FOUNDRY STREET COMPLEX
AKA ARKANSAS CHEMICAL AND HUMMEL CHEMICAL

SUMMARY

The Foundry Street Complex consists of six separate parcels of land, Lots 4 (Block 5005); Lot 5 (Block 5005); Lot 6 (Block 5005); Lot 10 (Block 5005); Lot 21 (Block 5005); and Lot 22 (Block 5005), see Attachment 1. The site is located in the Iron Bound Section of Newark and is situated between Foundry Street on the east, the former Manufacturas Railroad on the west, and Roanoke Avenue on the north. Bordering the southern portion of the site is the New Jersey Turnpike.

Approximately 30 small buildings are situated throughout the complex. The buildings are separated by narrow driveways which have strip-like drains in the middle of the lane. These drains are connected to an industrial sewer line on Roanoke Avenue and receive surface water run-off and industrial discharge from companies in the complex. The complex is easily accessible from numerous locations.

Historically, the Foundry Street Complex has been occupied by a variety of chemical manufacturing industries. One of the first known companies associated with the site was Central Dyestuff and Chemical Company (CDC), a New Jersey Corporation. CDC acquired the property in three different portions from Waldron Brothers Realty Company, Municipal Investment Company, and part of the premises known as Plum Point Lane duly vacated by the City of Newark. CDC manufactured color specialties which included oranges, fast reds, scarlets, browns, chrysoidine blacks, oil soluble colors, and a large variety of colors and dyes used for cakes, varnishes, inks, stains, straw, leather, etc.

On August 13, 1930, Central Dyestuff and Chemical Company merged with Consolidated Color and Chemical Company (CCC). The latter name was retained by the new corporation which continued to operate on site.

In January of 1936, Arkansas Company, Inc., a New York Corporation, executed a three year lease for space in buildings designated as #16, #24, #26, #27, #28, #32 and #35 with CCC. Consolidated Color and Chemical gave Arkansas the sole right and option to purchase the demised property. However, this option expired on October 31, 1938. After executing the lease with Arkansas, CCC changed their name to H.A. Metz & Company Inc., a New Jersey Corporation, on March 2, 1936. H.A. Metz & Company name was changed to Roanoke, Inc., a New Jersey Corporation, on May 24, 1937.

In January, 1939, Roanoke, Inc. sold the property which now consists of Lots 4, 5, 21 and 22 to Chemical Industries, Inc. for a sum of $10.00.

Prior to the sale of the premises, a ten year lease which became effective February 1, 1939, was negotiated between Arkansas Company, Inc., Chemical Industries, Inc. and Roanoke Inc. Arkansas Company's new lease still contained the right and option to purchase the premises which expired on November 1, 1943. Apparently, Arkansas and Chemical Industries, Inc. had negotiated the sale of the property before the November 1 deadline. The

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sale was finalized on December 27, 1943. The Newark Tax Map now designates this property as Lot 5 (Block 5005).

ARKANSAS COMPANY, INC.

Arkansas Company, Inc. (Arkansas Chemical) manufactured textile chemicals at the facility which included chelating agents, dye carriers, emulsifying agents, fire retardants, fungicides, resin finishes and water repellents.

In 1975, Arkansas was issued a Notice of Violation (NOV) by the U.S. EPA, Region II, for failure to implement a Spill Prevention Control and Countermeasure Plan for a 20,000 gallon storage tank containing No. 6 fuel oil. It is not known if any penalties were assessed against Arkansas for the violation.

Arkansas Chemical sold the property (Lot 5) to Galaxy, Inc. on February 23, 1978, but continued to operate on the premises as a tenant. The City of Newark foreclosed upon the property, for unpaid taxes, in September of 1983. Both Arkansas and Galaxy, Inc. subsequently filed for bankruptcy, under Chapter 11, in the United States Bankruptcy Court for the District of New Jersey.

Sometime thereafter, Arkansas Chemical ceased operations at the facility. NJDEP personnel discovered approximately 250 abandoned 55 gallon drums on the property during a site inspection on April 30, 1984. Labels found on the drums indicated that they contained benzene chloride, perchloroethylene, methanol, silane, isophorondiisocyanate, lactic acid and polyethylene glycol. Some of the drums were noted leaking their contents. Oil spillage was discovered on the rear portion of the property where open containers of petroleum products were stored.

The Division of Waste Management (DWM) issued a Directive Letter to Arkansas on September 21, 1984. Arkansas was directed pursuant to the Spill Compensation and Control Act, to immediately initiate remedial measures at the site which included: Securing access onto the site; listing all materials stored on site within fourteen days upon receipt of the directive; and properly removing and disposing of all containers and contaminated soil in accordance with Department regulation.

Howard S. Greenberg, registered agent for Arkansas, informed the NJDEP by letter dated October 3, 1984, that remedial contractors were being sought. A supplemental letter dated October 23, 1984, provided the names of potential contractors which included: Atlantic Remedial Constructors, Inc., Clean Venture, Inc. and Rollins Field Service, Inc. The letter also stated that Elson T. Killian Associates had been hired to oversee cleanup activities. A cleanup proposal was submitted by Clean Venture, Inc. in November, 1984.

Approximately 500 additional drums were discovered in building No. 28 during a subsequent inspection. Many of the drums were labeled for corrosive, flammable and poisonous materials. An unspecified number of five gallon pails were also found in an outdoor shed.

facility on September 19 and November 10, 1989. The sample results indicated that ground water was contaminated with VOCs, B/Ns, PHCs and priority pollutant metals. The concentrations detected exceeded ECRA action levels. However, the contamination appeared to be coming from an off site source.

As a result of potential off site contamination, five additional monitoring wells were installed at Sun Chemical. Ground water samples were collected from the eight monitoring wells on August 23, 1990. These samples contained elevated levels of VOCs, B/Ns, PHCs and priority pollutant metals.

The DWR, Bureau of Ground Water Control recommended that additional background sampling be conducted to verify off site sources of contamination in March of 1990. Recon Systems Inc. in an attempt to verify such sources, investigated the integrity of the drainage system (strip drains) and sewer system. Video inspection of the sewer system revealed that the sewer lines contained numerous cracks and separations between the pipes. The inspection also noted that the strip drains were connected to the sewer system on Sun's property.

On July 17, 1990, four sediment samples and one water sample was collected from catch basins and the sewer system on the property. The samples contained elevated levels of VOCs, B/Ns, organic acids, cyanides, and priority pollutant metals. Recon Systems Inc. investigative findings concluded that contamination could have migrated onto the facility through the drainage system and leaks in the sewer system.

It was also indicated that reoccurring flooding of the drainage system may have distributed past sources of contamination throughout the facility, resulting in the scattered pattern noted on the premises. Furthermore, "ground water contamination appeared to be a regional problem not directly attributable to Sun Chemical".

FLEET AUTO ELECTRIC

The western portion of Lot 22 is occupied by Fleet Auto Electric and Automatic Electro-Plating Inc. (AEP). Fleet Auto Electric rebuilds electrical parts (i.e. generators, alternators for cars) in building #29 which is located immediately adjacent, and on the west side of Sun Chemical (See Attachment 2). The company has operated in the building since the early seventies.

AUTOMATIC ELECTRO-PLATING CORPORATION

Automatic Electro-Plating (AEP), EPA ID #NJD002445500 conducts an electroplating business in buildings #19, #21 and #22 (See Attachment 2). AEP has occupied these buildings since April, 1971. Tennant Chemical Company once operated in building #21 during the sixties.

The company performs nickel and zinc plating which incorporates two automated methods: RACK (metal parts suspended from racks), building #21, and BARREL (metal parts are placed in a polypropylene barrel) building #22. Both procedures are dipped in the various plating solutions and rinses. AEP

stores their dry chemicals in building #19. The yard south of building #19 is used to store acid carboys.

Several processes are done to prepare the metal parts for plating. The parts are first cleaned with an alkaline solution which is followed by a water rinse. Next, the parts are placed in a mild acid bath for surface activation and once again rinsed with water. From this process, the parts are submerged either in the zinc or nickel solution. The zinc solution consists of zinc chloride, potassium chloride and boric acid. The nickel solution consists of nickel sulfate, nickel chloride and boric acid. After the plating is completed, the parts are rinsed with water a final time and air dried.

Spent plating solutions are discharged from two outlets into the outside drains surrounding the production building. The drains flow to a sewer connection located near the northeast corner of building #21. Prior to discharge, the pH of the effluent is adjusted (neutralized) in house before it is released to the Passaic Valley Sewerage Commission (PVSC) which regulates the discharge under permit #2040-1122. Automatic Electro-Plating's permit is effective until July 14, 1991.

In January of 1986, AEP was determined to be in violation of Sections 307 and 308 of the Clean Water Act, 33 U.S.C. Subsection 1317, and Subsection 1318. A Civil Action Suit (86-0920) was filed by the United States Environmental Protection Agency, Region II. Gerald Borriello, President of AEP, signed a Consent Decree on April 15, 1987 for settlement of the pending actions. A $100,000 penalty was paid for the violation by Automatic Electro-Plating.

A prospective acquisition of AEP stock by Gerald F. Mahoney and Sennody Volkov in 1989, initiated the Environmental Cleanup Responsibility Act (ECRA) pursuant to N.J.A.C. 7:26-B-1.6 (stock purchase and redemption agreement of controlling share of assets of an industrial establishment). Subsequently, a General Information Submission and Site Evaluation Submission were filed with the Bureau of Environmental Evaluation Cleanup and Responsibility Assessment (BEECRA) on November 30, 1989 and January 10, 1990 respectively. Both submissions were determined to be incomplete by the Industrial Site Evaluation Element (ISE).

The Earth Technology Corporation, consultant to Automatic Electro-Plating, submitted a ECRA Negative Declaration on April 6, 1990, but it was found to be deficient. A revised declaration submitted on April 18, 1990 was waved due to enforcement actions on the adjacent property. No sampling was originally proposed for the facility. However, Mr. Borriello stated during a site inspection on November 7, 1990, that the Department (presumably ECRA) is requiring him to investigate contamination on site through sampling.

LOT 6 AND 10, BLOCK 5005

The south-southeast portion of the Foundry Street Complex consists of Lots 6 and 10 (Block 5005). Ashland Chemical Company acquired the property from Lasp Realty, Inc. in June, 1968. The two parcels are referred to as the "West Plant" and lie adjacent to Arkansas Chemical. It should be noted that the Ashland facility is divided in half by the New Jersey Turnpike. The

SUBSTANCES DISCHARGED/ABANDONED:

The following contaminants were detected in sediment samples, soil samples, and surface water samples collected throughout the Foundry Street Complex by the Bureau of Planning and Assessment on October 14, 1988.

VOCs: Acetone, Benzene, 2-Butanone, Carbon Disulfide, Chlorobenzene, Chloroform, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,2-Dichloroethene, Ethylbenzene, Methylene Chloride, 4-Methyl-2-Pentanone, Tetrachloroethene, Toluene, 1,1,1-Trichloroethene, Vinyl Chloride

BNAs: Anthracene, Benzoic Acid, Benzo(a)Anthracene, Benzo(b) Fluoranthene, Benzo(k)Fluoranthene, Benzo (g,h,i) Perylene, Benzo(a)Pyrene, bis (2-Ethylhexyl) Phthalate, Butylbenzylphthalate, 4-Chloroaniline, 1,2 Dichlorobenzene, 1,3 Dichlorobenzene, 1,4 Dichlorobenzene, Dibenzo(a,h)Anthracene, Di-n-Butylphthalate, Di-n-Octylphthalate, 2,4-Dichlorophenol, Fluoranthene, Fluorene, Indeno (1,2,3,-c,d) Pyrene, 2-Methylnaphalene, Naphalene, 2-Nitroaniline, Phenanthrene, Phenol, Pyrene, 1,2,4-Trichlorobenzene, 2,4,6-Trichlorophenol

PESTICIDES:

Aldrin, Dieldrin, 4,4'DDT, Arcolor 1248

METALS: Antimony, Arsenic, Barium, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Silver, Vanadium, Zinc, Cyanide

843600016

DESCRIPTION OF SITE CONTAMINATION:

LOT 21 (BLOCK 5005)

Hummel Lanolin Corporation removed a 6,000 gallon underground storage tank, used to store fuel oil from the southwest corner of Lot 21 in 1985. The location of this former tank was a major environmental concern of Hummel Lanolin. As a result of this concern, Dames & Moore, consultants for Hummel Lanolin, installed six soil borings in the area of the former tank. Soil samples were collected at six inches above the saturation zone (approximately 5.0 - 5.5 feet in depth) and six inches below the base of the tank (approximately 10.0 - 10.5 feet in depth). It should be noted that ground water was encountered at a depth of five and one half feet.

All twelve samples were found to have petroleum hydrocarbons ranging in concentrations from 16 ppm to 1,720 ppm. Three samples analyzed for base neutral compounds revealed the presence of bis (2-ethylhexyl) phthalate, di-n-butyl phthalate, and napthalene. Other base neutral compounds were detected but could not be definitively identified. The two samples containing the highest concentrations of petroleum hydrocarbons were further analyzed to determine their constituents (fuel oil or wool grease). High concentrations of wool grease were detected in the sample taken from beneath the tank. The other sample, which was taken above the saturation zone revealed higher levels of fuel oil.

Six additional soil borings were made in the area of the former tank in March, 1987. The soil samples collected from these borings contained VOCs (i.e. benzene, toluene, 2-butanone, trichloroethane, 1,2-dichloropropane, xylene) semi volatiles (i.e. napthalene, fluoranthene, pyrene, chrysene, benzo(a)pyrene, phenanthrene), PHCs, and metals (i.e. cadmium, chromium, copper, lead, zinc).

Dames & Moore installed four monitoring wells (MW) in the vicinity of the former tank in July, 1987 to determine if ground water had been contaminated. During the installment of MW-1, a sludge like material with a septic odor, was encountered. On August 13, 1987, a soil boring was made approximately one foot from MW-1. The sludge material was not detected in the soil sample taken from the boring, however, a septic odor persisted. Contaminants detected in the sample included VOCs, B/Ns, pesticides and metals (arsenic, cadmium, lead and zinc).

A ground water sample was extracted from MW-2 on August 17, 1987. No significant levels (less than 1 ppm) of petroleum hydrocarbons and oil/grease were detected in the sample. It should be noted that no analysis for priority pollutants was performed on the sample. The presence of VOCs, B/Ns, and metals in soil samples would suggest possible leaching of these contaminants into the underlying ground water.

To further delineate the source of the sludge material, a sediment sample was collected from the base of a manhole located 60 feet from the facility on the southern portion of the property. The sediment sample contained VOCs, PHCs, and metals. These are the same types of contaminants present in the soil sample taken from the boring next to MW-1.

A composite soil sample was obtained from beneath a floor drain in the process building located near the area where the sludge material was discovered outside. The sample was taken at a depth of 20.5 - 26.3 inches and 26.1 - 32.5 inches. The sample contained VOCs, B/Ns, and metals below ECRA action level. The floor drains were determined not to be a source of the sludge through the concentrations detected in the soil sample.

In October, 1988, Dames & Moore collected a sediment sample (WC-1) and water sample (WC-2) from the drainage basin situated on the north side of the process building. The sediment sample contained methylene chloride (11,000 ppb), toluene (6,100 ppb), five B/Ns below method detection limits, and metals (i.e. cadmium, copper at 1,096 ppm, lead at 1,044 ppm, selenium, zinc at 3,746 ppm). The water sample contained low levels of cadmium and lead. However, both samples had elevated levels of total petroleum hydrocarbons.

LOT 22 (BLOCK 5005)

A preliminary ECRA investigation was performed at the Sun Chemical facility by Recon Systems, Inc. on October 14, 1986. Three (3) samples consisting of one soil sample from an unpaved area adjacent to a solid waste dumpster, one sediment sample from a drain located in the drive way south and adjacent to Sun, and one swipe sample of a oily substance on a boiler room floor were taken during the sampling episode.

The soil and sediment samples exceeded the Bureau of Industrial Site Evaluation cleanup levels for base neutral compounds and petroleum hydrocarbons. Base neutral compounds detected included napthalene, 2-methylnapthalene, di-n-butyl phthalate, bis (2-ethylhexyl) phthalate and unknown brominated compounds. Metals (i.e. antimony, arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc) were also present in both samples. PCBs were detected in the soil and swipe sample.

In August, 1989, three monitoring wells were installed at Sun Chemical to examine ground water quality. Two of the three wells (MW-1, MW-3) were placed on the west and north side of the facility respectively. While MW-2 was placed to the south of the facility. Ground water was determined to flow in a southeast direction and was reported to be influenced by tidal action.

Ground water samples were collected from the monitoring wells on September 19 and November 10, 1989. The samples from all three wells exceeded ECRA action levels for total B/Ns and VOCs. However, levels detected in MW-2 were lower than those levels detected in the other two monitoring wells (MW-1, MW-3). In addition MW-3 also exceeded action levels for PHCs, PCBs, and metals (i.e. arsenic, cadmium, lead, mercury, zinc).

Recon Systems, Inc. collected four (4) sediment samples and one water sample from Sun's sewer system on July 17, 1990. Sediment sample #1 was collected from the drainage system (strip drain) located in the driveway separating Sun and Arkansas Chemical where a second drain from Arkansas property connects into the first drain. The sample contained elevated levels for volatile organic compounds (VOC), base neutral compounds (B/N), organic acids, cyanide, phenol and priority pollutant metals (i.e. lead, mercury).

843600018

RESPONSIBLE PARTY:

Automatic Electro-Plating Corporation (Duns #00-244-5500)
185 Foundry Street
Newark, NJ 07105-4208
(201) 589-0344

Block 5005, Lot 22

Registered Agent:
J.J. Longley
426 Springfield Avenue
Summit, NJ 07901

Corporate Status:
Active; SIC 3471; Electro-Plating

Financial Status:
Sales $1,000,000 latest year 1989 (Dun & Bradstreet)

Principals:
President - Borriello, Gerald
260 Knoll Drive
Block: 2505 Lot: 7 (Park Ridge Borough, Bergen County)

Assessment:
$136,900 Land
$221,400 Improvements
$358,300 Total Assessment

CONCLUSIONS AND RECOMMENDATIONS:

Historically operations at the Foundry Street Complex have contributed to contamination through the handling of hazardous substances and contributory operations. Ellis R. Meeker's book entitled "New Jersey, A Historical, Commercial and Industrial Review", Commonwealth Publishing Company, 1906, indicates that Central Dyestuff and Chemical Company manufactured tar colors at their extensive plant at Plum Point Lane. This is substantiated by information obtained through a title and deed search. Part of the property making up the Foundry Street Complex was formerly known as Plum Point Lane.

According to the Encyclopedia of Chemical Technology products recovered from the fractional distillation of coal tar have been the traditional raw materials for the dye industry. Among the most important are benzene, toluene, xylene, naphthalene, anthracene, acenaphthene, pyrene, pyridine, carbozal, phenol and cresol. The reference further states that dye companies expanded their activities into the pharmaceutical field. Pharmaceuticals such as sulfa drugs were derived from compounds already in use as dye intermediates.

H.A. Metz & Company, Inc., successors to Consolidated Color and Chemical Company by virtue of name change, was identified to have once manufactured drugs at the Foundry Street Complex. This information was obtained from the Industrial Directory of New Jersey (1931) and Sanborn Fire Insurance Maps.

Hummel Lanolin Corporation and Sun Chemical Company have investigated their facilities located within the Foundry Street Complex for potential sources of contamination pursuant to the Environmental Cleanup Responsibility Act (ECRA). Extensive files are maintained relative to these activities with ECRA.

NOTE: ECRA File Numbers are Provided on Page 50

Ground water samples taken from eight monitoring wells installed throughout the Sun Chemical facility contained elevated levels of volatile organic compounds (VOCs), base neutral compounds (B/Ns), petroleum hydrocarbons (PHCs) and priority pollutant metals. Recon Systems Inc. determined that the flow of ground water in the vicinity of the facility is from the south in a radial direction. Arkansas Chemical and Ashland Chemical Company's Industrial Chemical and Solvents Division are situated upgradient of Sun Chemical.

Widespread contamination has been documented throughout the "West Plant" of Ashland's Industrial Chemical and Solvent Division. The west plant lies approximately 300 feet south of Sun Chemical. Contamination on this property has resulted from numerous spills, leaks, and poor house keeping practices associated with the 200 Series tank farm, drumming warehouse, and truck and rail car loading/unloading manifolds. The 200 Series tank farm was used to store products such as mineral spirits, napthalene, plasticizer, fuel oil, toluene and xylene. In addition, halogenated VOCs (i.e. 1,1-dichloroethane, 1,1,-trichloroethane, tetrachloroethane), aromatic VOCs (i.e. benzene, toluene, xylene) and petroleum distillates have been detected in ground water and soil samples collected from the West Plant. The highest

concentrations have been detected in the area of the former 200 Series tank farm. It should be noted that most of the West Plant is not paved.

Arkansas Chemical Company occupied the adjoining property to the south of Sun for approximately 47 years. It should be noted that Arkansas vacated the premises in 1984. The two companies are separated by a narrow driveway. Numerous storage tanks were maintained in the rear south-southwest corner of the property (Lot 5), adjacent to building #28. Arkansas used these tanks to store fuel oil, sulfuric acid, caustic soda, mineral oil, naptha and other products. In 1981, a NJDEP, Division of Hazard Management representative noted weep holes in a caustic tank. Spillage stained the ground below the tank and other tanks in the area.

In October, 1988, two soil samples were taken from the southwest corner of the facility behind the former tank house. Both samples were obtained from the same boring. The shallow sample (S-2) contained high concentrations of VOCs (i.e. xylene, toluene, tetrachloroethylene, chlorobenzene, ethylbenzene) and semi volatiles (i.e. napthalene, 2-methylnapthalene). Only tetrachloroethylene was present in the deep sample (S-3). This suggests that the contamination is the result of surface spillage which has not deeply penetrated into the ground. Spillage from petroleum products was observed on the ground in the rear (west side) of the property during an inspection in 1984. In addition naptha was stored in a tank near the sample location. Napthalene and 2-methylnapthalene were detected in the shallow soil sample. Spillage or leakage from the tank could have migrated from the tank to this area.

It should be noted that the drainage system throughout the Foundry Street Complex is a major source of contamination. Sediment and surface water samples collected from the drainage system in October, 1988, contained high concentrations of VOCs, B/Ns, PHCs, PCBs and priority pollutant metals. The drainage system essentially consists of troughs embedded in the driveways which are connected to sewerlines. A site inspection conducted at the Foundry Street Complex on November 7, 1990, revealed that many sections of the drains had collapsed or were broken. Water observed in the drains had a petroleum sheen on its surface and a heavy residue existed on the bottom. It was also reported that the drains would frequently flood during periods of rain. Any contamination in the drains could be redistributed over other areas covered by the flood waters.

The drainage system connects to sewerlines located on the south side and to the northwest of Sun Chemical. The sewerline on the south side, transverses underneath the Sun facility. Both sewerlines are connected to an industrial sewerline on Norpak's property to the north. The industrial sewerline is connected to a city sewer on Roanoke Avenue. Four sediment samples were collected from the drainage system and sewerlines surrounding Sun Chemical on July 17, 1990. These samples contained elevated levels of VOCs, B/Ns, organic acids, unknown semi volatiles, and priority pollutant metals.

Recon Systems, Inc. video inspection of the sewerlines on the premises of Sun Chemical revealed numerous cracks and separations between the pipes. Any contamination entering the sewerline could escape through these openings into the surrounding soil.

Drains from Arkansas Chemical were discovered to flow directly from Building #26, #27 and #28 (See Attachment 4). The drains are connected to the drainage system in the driveway on the north side of the facility. Herman G. Wieland, Chief Chemist of Arkansas, stated in a Sewer Connection Application dated October 27, 1980 that the plant's effluent is neutralized in an outside tank and discharged into "city storm sewers via covered ditches". Waste water samples taken from Arkansas Chemical in October, 1981 contained trace concentrations of arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc. Mercury was detected in effluent samples taken in June and July, 1981. These contaminants have been detected in sediment samples taken from the drains throughout the Foundry Street Complex.

Division of Hazard Management personnel noted in 1981, that spillage from the process building (#28) could flow unobstructed into strip drains outside. It was also indicated that drains located in the shipping building (#27) flowed directly off the premises. In December, 1986, NJDEP personnel observed powder and resin on the floors of the process building. In addition, numerous fiber drums and lines on reactor/process vessels were leaking their contents. The roof was also noted to be leaking which could wash spillage into floor drains that flowed into the drainage system. Many of the products removed from Arkansas Chemical by the EPA were base neutral compounds, acids, cyanides, peroxides, flammables, halogenated organics, oxidizers and organics.

Automatic Electro-Plating Corporation (AEP) has operated an electroplating business on the western portion of Lot 22, adjacent to Sun Chemical, since 1972. The drainage system borders the facility on its north, west and south side, and receives point source discharge and surface water run-off from AEP. A sewerline on the east side is connected to a sanitary source at the facility. Elevated levels of VOCs and priority pollutant metals were detected in a sediment sample (Sediment #2) taken from a catch basin where the two sewerlines connect in July, 1990.

A flow diagram submitted by AEP to the Passaic Valley Sewerage Commission in January, 1989 shows process lines from buildings #21 and #22 discharge into the drain on the north side. High concentrations of arsenic, cadmium, chromium, copper, lead, mercury, silver and zinc were detected in a surface water sample (SW-4) taken from this drain on October 14, 1988.

This drain and the noted sewerline connect to one another at a catch basin situated near the corner of building #21. Elevated levels of VOCs, B/Ns, PCBs, organic acids, unknown semi volatile compounds and priority pollutant metals (i.e. cadmium, chromium, copper, lead, nickel, zinc) were detected in a sediment sample (Sediment #3) collected from this catch basin in July, 1990.

In January, 1989 Gerald Borriello, President of AEP, informed the Passaic Valley Sewerage Commission that his company does not discharge any cadmium, lead, silver or cyanide into the sewage system. Automatic Electro-Plating's ECRA General Information Submission (GIS) states that only nickel and zinc plating are conducted on site. These metals have been detected in sediment samples collected from the drainage system.

According to the Division of Environmental Quality (DEQ) Right to Know Survey dated November 10, 1988, Automatic Electro-Plating Corporation used materials containing chromium, copper, nickel, silver, zinc and cyanide. The GIS indicated that dry chemicals are stored in building #19. Samples SW-3 and SED-4 were obtained from the drain located on the west side of buildings #21 and #22, and adjacent to the chemical storage area on October 14, 1988. High concentrations of metals detected in these two samples suggest that run-off may be transporting spilled materials from the storage area into the drain.

Records obtained from the PVSC revealed that AEP once conducted chrome electro-plating (see file copy of AEP General Information Sewer Connection Application, 1980). An effluent sample taken on December 12, 1979, during "usual electro-plating" operations contained arsenic, cadmium, chromium, copper, lead, nickel and zinc.

In 1982, AEP informed the DWR that they are experimenting with nontoxic products such as cyanide free plating solutions, and chromium free passivities to reduce the discharge of chromium. Subsequently, AEP consistently failed to meet electro-plating discharge standards which initiated enforcement actions by the USEPA in 1986.

Another potential source of contamination may have originated from the Polychrome Corporation, Cellomer Division. Sun Chemical stated in their General Information Submission that Cellomer occupied the premises before 1967. Cellomer's address is listed as 185 Foundry Street in New Jersey Industrial Directories from 1964 through 1966. There is no information concerning the company's activities at the Foundry Street Complex.

In subsequent directories, the address was listed as 46 Albert Street, Newark. Cellomer manufactures alkyd resins at this location. Some products used include vegetable oils, polyols, phthalic anhydride, aliphatic and aromatic solvents. The company submitted to the PVSC a base line monitoring report (BMR) for process water samples taken during normal operations in June, 1988. The samples contained detectable levels of benzene, benzoic acid, methylene chloride, toluene, xylene, bis (2-ethylhexyl) phthalate, and di-n-butyl phthalate. These substances have been detected in soil and sediment samples taken from Sun Chemical.

In 1989, O'Brien & Gere Engineering, Inc. was retained to address compliance with waste water discharge regulations. A compliance monitoring report indicated that Cellomers regulated waste stream exceeded maximum concentration limits for toluene, ethylbenzene, and phenol. In addition, toluene and bis (2 ethylhexyl) phthalate were detected in the plant's effluent. O'Brien & Gere concluded that the company was not consistently complying with standards for phenol, bis (2 ethylhexyl) phthalate, ethyl benzene and toluene. These substances have been detected in ground water, surface water and sediment samples collected from the drains around Sun Chemical and Automatic Electro-Plating. Neither Sun Chemical or Automatic Electro-Plating are known to utilize these substances, therefore Polychrome's operation at Foundry Street are a likely source of this contamination. Polychrome's Cellomer Division name was changed to Reichhold Chemical Inc. in 1989.

Avon Drum Corporation has operated a drum brokerage on the northern portion of Lot 4, adjacent to Roanoke Avenue and west of the former Hummel Lanolin facility for approximately 20 years. Historical aerial photographs (EPI-IRC-6571, 6572, 6573) taken on September 6, 1978, revealed extensive drum storage along Roanoke Avenue where Avon Drum operates. The area appeared to be heavily stained.

High concentrations of VOCs (i.e. xylene, tetrachloroethene, toluene, ethylbenzene), semi volatiles (i.e. phenanthrene, di-n-butyl phthalate, fluoranthene, pyrene, benzo(a)anthracene), PCBs, and priority pollutant metals were detected in soil samples (S-12, S-13, S-14) collected from the facility on October 14, 1988. Two soil samples (S-10, S-11) taken at the perimeter of the facility contained significantly fewer contaminants at lower concentrations. This implies that contamination is directly associated with site operations (i.e. drum storage). Representatives from the Bureau of Compliance and Technical Services observed spillage throughout the facility on November 7, 1990. During this inspection, a solvent odor was encountered. Two operators at the Foundry Street Complex also stated that the company washes drums out on the premises. Consequently any remaining residues in the drums would be allowed to discharge onto the ground. There is no protective barrier (i.e. concrete, asphalt) at the facility.

Berg Chemical Co. and Conus Chemical conducted a chemical repackaging and distribution operation in buildings #5, #5A and #7 located on the west side of Lot 4 adjacent to the railroad tracks. Products handled at the facility included acids, alcohols, solvents, petroleum products, corrosives, reactives and flammables. A large inventory of these products were stored inside and outside of the buildings. The outside storage area lacked adequate spill prevention structures to prevent spillage from seeping into the ground. High levels of chloroform, 1,2-dichloroethene, trichloroethylene, tetrachloroethylene, 2-methylnapthalene, benzoic acid, phenthane, di-n-butyl phthalate, pyrene and butyl benzyl phthalate were detected in a soil sample (S-9) collected near the drum storage area on October 14, 1988.

An EPA inventory taken from drums located in the outside storage area included trichloroethylene, chloroethylene, naptha distillate, benzyl chloride, toluene and petroleum ether. Some of these substances were detected in the soil sample. In February, 1990 NJDEP, DHWM personnel reported that various spills of hazardous substances existed outside of the facility. It was also noted that soils were stained along the western portion (exterior) of Conus.

NJDEP representatives observed spillage throughout the inside of building #5 during a presampling site inspection in October, 1988. Conus stored a variety of hazardous substances in 55 gallon drums, fiber drums, fiber bags, small containers and above ground storage tanks. Spillage was also observed inside on subsequent inspections. Floor drains in building #5 were determined to curve towards the east side of the facility. This suggests that the drains may be connected to the drainage system location in the driveway outside. Any spillage resulting from repackaging could flow or be washed into the floor drains.

High concentrations of VOC (i.e. methylene chloride, 1,1-dichloroethene, 1,2 dichloroethene, 1,2 dichloroethane, 2-butanone, 1,1,1-trichloroethene, xylene, trichloroethylene, benzene, tetrachloroethylene, toluene, chlorobenzene), semi volatile (i.e. 1,2-dichlorobenzene, napthalene, 2-methylnapthalene, phenanthrene, fluorene, flouranthene, pyrene, butylbenzyl phthalate, bis (2-ethylhexyl) phthalate) pesticides, PCBs and priority pollutant metals were detected in a sediment sample collected from the drain situated between Conus (Building #5) and RFE Industries (Building #1) on October 14, 1988.

An inventory of hazardous materials found in building #5 included: Petroleum product residue, naptha sillate, kerosene, mineral spirits, n-butyl lactate, dry cleaning solution to name a few. Other potential sources of contamination detected on the west-northwest side of Lot 4 may have originated from operations conducted by Coronet Chemical Co., Grignard Chemical Co. Inc., Honig Chemical and Processing Co., Hummel Chemical, RFE Industries, Morrel Truck Services, and County Lift Truck Service.

Grignard Chemical Co. manufactured lubricating oils, cutting oils, cleaners and preservatives in building #7. This consisted of blending materials such as petroleum oil, alkaline additives, chlorinated hydrocarbons and diester compounds with non-hazardous components. Grignard's "Site Evaluation Submission" dated August 21, 1990 included a Hazardous Substance/Waste Inventory List (Appendix D). The list notes that Grignard used dichlorobenzene, dichloromethane, 1,1,1-trichloroethane and petroleum distillates. High concentrations of dichlorobenzene, 1,1,1-trichloroethane, and B/Ns were detected in sediment sample (SED-5) collected from the drain outside building #5 on October 14, 1988. Petroleum distillates with high molecular weights will be present in the base neutral fraction. Such compounds might be related to B/Ns contamination detected in the ditch.

The company has not manifested any hazardous waste from their facility between 1980 and 1989. Grignard reportedly received a shipment of PCB contaminated transformer oil from G&S Motor Equipment Company in 1981. According to Grignard's response to a "Request for Information" dated January 8, 1991, indicates they are no way related to G&S Motor Equipment Company. High concentrations of PCBs (Arcolor-1248) was detected in the previously noted sediment sample.

Another potential source of contamination is Coronet Chemical Company. The company reclaimed napthalene from spent teflon etching solutions in building #9 during the early eighties. Waste generated from the reclamation process was disposed in a dumpster. Leaking drums of napthalene were observed during RCRA inspections at the facility. The location of the dumpster and leaking drums are not known. However, discharges from either source could seep into the ground or migrate into the drain on the west side of Coronet Chemical.

Coronet Chemical was also developing a sodium dispersion to destroy PCBs. However, it is not known if the company inventory of hazardous substance included PCBs. It should be noted that high concentrations of napthalene and PCBs were detected in sediment sample (SED-5) collected on October 14, 1988. Coronet Chemical was evicted from the facility in 1986. Numerous drums containing metallic sodium were abandoned in building #4. This

building was used for storage. Inspection of the building in July, 1987 revealed that one of the drums had reacted.

Grignard identified Honig Chemical and Processing Co. as having operated in building #7 and #8 during the early seventies (1970-1975). This information was stated in Grignard's ECRA Site Evaluation Submission. In October, 1988 Gerald Berriello of Automatic Electro-Plating stated that Honig operated in a building next to Conus Chemical which exploded. It should be noted that building #13 was destroyed by an explosion in 1962. This is stated in a Newark, Division of Inspections Violation Report.

Honig manufactures organic chemicals at a facility located at 414 Wilson Avenue, Newark, NJ. According to the Division of Environmental Quality, Right to Know Survey, Honig Chemical uses the following hazardous substances: Arsenic trioxide, barium nitrate, benzene, chloroform, dichloromethane, lead nitrate, mercury chloride, mercury acetate, mercury metal, petroleum spirits, pyridine, silver nitrate and toluene. High concentrations of arsenic, barium, lead, mercury and silver were present in a soil sample (S-6). The sample was taken on the west side of building #15 where it was once attached to building #13. High concentrations of acetone, barium, benzene, chloroform, toluene and pyrene were detected in sediment sample (SED-5) collected from the drain between building #1 and building #5.

Hummel Chemical is also believed to have operated on the west side of the Foundry Street Complex according to Howie Levy of Fleet Auto Electric. This information was obtained during a presampling site inspection in October, 1988.

Hummel Chemical Co. Inc. address is listed as 185 Foundry Street in New Jersey Industrial Directories from 1966-1970. A "Request for Information" was issued to Hummel Croton Inc. (HCI), successors of Hummel Chemical, on December 7, 1990. HCI's response dated December 28, 1990 verified that Hummel Chemical operated at the Foundry Street Complex until April of 1968.

The company supplied chemicals to the pyrotechnic industry. Most of the items handled were purchased from other companies in truckloads, rail car, and less than truckload quantities. It should be noted that only the west side of the Foundry Street Complex is serviced by a rail siding. HCI claims that most of the chemicals were shipped out in their original container without being opened. Hummel Chemical also grinded nitrates on the premises. Such operations at the HCI facility in South Plainfield has contributed to soil contamination. Airborne particulate generated by the grinding process would accumulate around ventilators on the roof. Subsequently particulate would wash off the roof from rain and onto the surrounding grounds.

Soil samples (S-7, S-8) taken on the west side of building #5 and #7 contained high concentrations of antimony, cadmium, chromium, copper, lead, mercury, nickel and zinc. HCI indicated that Hummel Chemical handled antimony sulfide and zinconium powder. They may have also handled copper oxide, copper oxychloride, lead chromate, lead dioxide, lead oxide, zinc dust, zinc oxide at the site in Newark. These products are used at the South Plainfield facility.

Hummel Chemical was also a producer of Class III organic chemicals at the Foundry Street Complex according to a USEPA publication entitled "Dioxins" (EPA 600/2-80/197) November, 1980. These organic chemicals are precursor of dioxins. Compounds identified included 2,4-dinitrophenoxyethanol, 3,5-dinitrosalicyclic acid, hexachlorobenzene and picric acid. On October 14, 1988, four soil samples were collected from the Foundry Street Complex and analyzed for the 2, 3, 7, 8 TCDD dioxin isomer. However, none of these samples were taken from areas where Hummel Chemical is believed to have operated.

The ground in a small yard, approximately 50 x 20 feet, situated between Morrel Truck Service (Building #9) and County Lift Truck Service (Building #14) was saturated with oil during a site inspection by the Bureau of Compliance and Technical Services (BCTS) Special Investigation Section personnel on November 7, 1990. In addition, there was evidence of a recent spill where speedy dry had been applied. Spillage was also observed around the drain in the driveway which separates the two facilities from Conus Chemical. The yard contained an assortment of oily/greasy truck parts (i.e. engines, rears, transmissions). These parts were laying directly on the ground without any type of barrier. It should be noted that Morrel repairs trucks and County Lift operates a forklift rental business. Spillage in the yard can penetrate underlying soils or be washed into the drain when it rains.

RFE Industries occupies building #1 which abuts Roanoke Avenue on its north side. On November 7, 1990 approximately ten 55 gallon drums were observed by BCTS personnel in the driveway outside of building #1. Upon closer inspection of the drums, it was discovered that some of the drums had been turned over to allow any remaining contents to drain out. The contents of these drums flowed into a large pool of water in the driveway. The drums were marked "Proprietary Solvent Mix #100" contained denatured ethyl alcohol. Such practice by RFE Industries has contributed to on-site contamination. Other types of materials handled are unknown.

C.W.C. Industries, Inc. stored raw materials (i.e. isopropanol, methyl ethyl ketone, toluene, V.M.P. naptha, methanol) and process residues in a small fenced yard located adjacent to the south side of building #17 and the west side of building #18. On November 7, 1990 staining was observed on the concrete throughout the yard and on the east side of building #18. The concrete in the yard contained many fractures. Any spilled or leaking substance could penetrate the underlying soil through the fractures or migrate into a drain located outside the fence. No diking exits around the storage yard.

High levels of VOCs (i.e. 1,1-dichloroethane, 1,2-dichloroethane, trichloroethylene, benzene, 4-methyl-2-pentanone, toluene, chlorobenzene) were present in a surface water sample collected from the south side of building #17 on October 14, 1988. An active flow was noted in the drain during the sampling. C.W.C. uses toluene. The company applies solvent based surface coatings to polyesters. It is not known if any floor drains are connected to the drainage system or if process effluents is discharged into the drain.

Contamination (i.e. VOCs, B/Ns, priority pollutant metals) detected on the property of Hummel Lanolin Corporation (HLC) may have originated from two sources. An industrial sewer line runs underneath the property before connecting to a city sewerline on Roanoke Avenue. The industrial sewer receives discharge and run-off from the Foundry Street Complex. In July, 1987, a black sludge-like material with a septic odor was encountered during the installation of monitoring wells near the sewerline. The sludge material contained VOCs, PHCs, and metals. A sediment sample collected from a manhole on the sewerline, located upgradient of the facility, contained VOCs, PHCs, and metals. Similar contaminants (i.e. VOCs, PHCs, metals) were present in a sludge sample taken from a basin on the north side of HLC process building. The sludge had back flowed into the basin from the industrial sewerline. It should be noted that the basin is located downgradient of where contamination was detected. Priority pollutant metals (i.e. cadmium, chromium, copper, lead, nickel, zinc) detected in the sludge are used by Automatic Electro-Plating located upgradient of HLC.

Dames & Moore, consultants for HLC, determined that ground water in the vicinity of the former underground storage tank flowed in a east-southeast direction in July, 1987. Soil borings made in the vicinity of the tank contained elevated levels of B/Ns (i.e. napthalene, fluoranthene, chrysene, pyrene, benzo(a)pyrene, phenanthrene). High concentrations of base neutral compounds were detected in five soil samples collected from Avon Drum on October 14, 1988. Avon Drum is located adjacent and hydraulically upgradient of Hummel Lanolin Corporation. HLC did not use any VOCs, B/Ns, or priority pollutant metals in their operations.

Kem Realty purchased Lot 4 in May, 1962. Anthony A. Coraci, Vincent J. Coraci and Mary Coraci were the incorporators of Kem according to the Certificate of Incorporation. A deed between Kem Realty and Hummel Lanolin dated February 28, 1964, identified Vincent Coraci as the President of Kem.

In April, 1976, Kem Realty merged with several companies including Norpak Corporation to form Torco Investment Corporation. Torco's name was subsequently changed to Norpak Corporation by a Certificate of Amendment to a Certificate of Incorporation. Norpak's and Torco Investment Corporation's address are both listed as 70 Blanchard Street, Newark.

By Certificate of Merger dated December 31, 1980, Norpak merged with Norpak Specialties Corporation, Leeds Enterprises, and Abar International Corporation forming ACC Transitional Investing Corporation. Anthony A. Coraci is listed as the registered agent for Norpak Specialties, Leeds, and Abar. A Certificate of Incorporation for ACC Transitional Investing Corporation identifies Anthony A. Coraci, Vincent J. Coraci and Mary Coraci as the first Board of Directors.

ACC conveyed Lot 4 to Norpak on November 11, 1981. A.A. Coraci is currently the President of Norpak Corporation, 70 Blanchard Street, Newark, New Jersey. Therefore, Norpak Corporation, Anthony A. Coraci, Vincent J. Coraci and Mary Coraci have owned Lot 4 since 1962 and subsequently leased out space in buildings on the premises. Numerous discharges have occurred on the property as a result of tenants on site. Norpak and its officers have not made any attempts to remediate contamination on site.

The City of Newark, Division of Inspections issued a Certificate of Occupancy to Essex Chemical for 185 Foundry Street on November 7, 1971. Peter Chan of C.W.C. Industries stated that Essex Chemical once operated in building #17 during a presampling inspection on October 7, 1988. Essex Chemical manufactures inorganic chemicals at a facility on Doremus Avenue. The Division of Environmental Quality, Right to Know Survey indicated that Essex Industrial Chemical uses: Acetone, chloroform, chromium oxide, chromium and compounds, lead nitrate, lead and compounds, and silver nitrate. These substances have been detected in a sediment sample (SED-5) collected from the drain outside of building #5.

ABC Demolition Company was evicted from building #15 by Norpak in October, 1989. The company renovated old buildings and disposed debris from their projects on the property. On November 2, 1989, approximately 13 x 55 gallon drums were observed around the exterior of building #15. Subsequent inspection of the interior of the building discovered additional drums. The Bureau of Compliance and Technical Services, Special Investigation Section determined through their investigation that Norpak, the property owner, was the only viable responsible party (Norpak/ABC Demolition file).

Ace Chemical Corporation was identified as having operated at the Foundry Street Complex according to a Newark, Department of Health and Welfare, Division of Inspections list of "Hazardous Waste Addresses" dated March 12, 1979. Apparently, no certificate of occupancy was issued for this operation by the City of Newark. No other information is known about the company's operations at the Foundry Street Complex.

Tennant Chemical Corporation and Weston Chemical Corporation were also identified as site operators through "Application for Building Permits" issued by the City of Newark. Both companies manufactured chemicals. No other information is known about their operations. Arkansas Company, Inc., Central Dyestuff and Chemical Company, Chemical Industries, Inc., Consolidated Color and Chemical Company, Coronet Chemical Company, Galaxy Inc., H.A. Metz Company, Inc., Ohmlac Paint and Refinishing Company, Tenant Chemical Corporation, and Weston Chemical Corporation have been determined to be dissolved.

Ashland Chemical Company, Automatic Electro-Plating Corporation, Avon Drum Corporation, Berg Chemical Company, Inc., C.W.C. Industries, Inc., Conus Chemical Company, Inc., County Lift Truck Service, Morrel Truck Service, and RFE Industries have been identified as primary responsible parties. The City of Newark, Foundry Street Corporation, Norpak Corporation, and Torco Investment Corporation have also been identified as primary responsible parties for being the owners of the contaminated property located on Lots 4, 5, and 22 (Block 5005).

Essex Chemical Company, Fleet Auto Electric, Grignard Chemical Company, Inc., Honig Chemical and Processing Corporation, Hummel Croton Inc., and Reichhold Chemical Company are potential responsible parties. These companies once operated at the Foundry Street Complex and used substances similar to those detected on site. However only limited or no information exists concerning their activities at the subject site.

Ashland Chemical Company (Case #88695), Hummell Lanolin Corporation (Case #86732) and Sun Chemical Company (Case #86960) have initiated actions to investigate and remediate contamination detected at their facilities pursuant to the Environmental Cleanup Responsibility Act (ECRA). Other ECRA investigations at the Foundry Street Complex include: Automatic Electro-Plating Corporation (Case #85708), Berg Chemical Company, Inc. (Case #90289), C.W.C. Industries, Inc. (Case #90598), Conus Chemical Company, Inc. (Case #90217), Grignard Chemical Company, Inc. (Case #90624).

It is recommended that information provided in this report should be used as a tool to assist in the evaluation of ongoing ECRA investigations (i.e. Berg Chemical, CWC Industries, Inc., Conus Chemical, Grignard Co., Inc.). This may be valuable in determining sampling locations and sampling plans at the noted facilities.

Site investigations conducted by Sun Chemical and Hummel Lanolin Corporation have indicated that ground water is contaminated at the Foundry Street Complex. Therefore all responsible parties and potential responsible parties identified in this investigation should be held jointly and severely liable for contamination of ground water pursuant to the Spill Compensation and Control Act. Their handling of hazardous substances and contributory operations (i.e. storage, processing) have contributed to contamination as noted in this report. It is recommended that an Administrative Consent Order be drafted and issued to the identified responsible parties to address the ground water contamination.

Recovery of administrative costs charged to this case (Project Activity Code JNK and JNM) should be an objective of Department actions. Contact this bureau regarding information or questions on the subject case file.

INVESTIGATOR:

Paul Smith
Environmental Specialist
NJDEP-Division of Hazardous Waste Management
Bureau of Compliance and Technical Services
Special Investigations Section
401 East State Street
Trenton, NJ 08625
(609) 633-0700

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

JUN - 8 2006

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

George Scott, President and Chairman
Automatic Electro Plating Corp.
185 Foundry Street, Suite 3
Newark, NJ 07105

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

Dear Mr. Scott:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release and/or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq. EPA is seeking your cooperation in an innovative approach to environmental remediation and restoration activities for the Lower Passaic River.

EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the six-mile stretch of the river known as the Passaic River Study Area, which is part of the Diamond Alkali Superfund Site ("Site") located in Newark, New Jersey. Based on the results of previous CERCLA remedial investigation activities and other environmental studies, including a reconnaissance study of the Passaic River conducted by the United States Army Corps of Engineers ("USACE"), EPA has further determined that contaminated sediments and other potential sources of hazardous substances exist along the entire 17-mile tidal reach of the Lower Passaic River. Thus, EPA has decided to expand the area of study to include the entire Lower Passaic River and its tributaries from Dundee Dam to Newark Bay ("Lower Passaic River Study Area").

By this letter, EPA is notifying Automatic Electro Plating Corp. of its potential liability relating to the Site pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Under CERCLA, potentially responsible parties ("PRPs") include current and past owners and operators of a facility, as well as persons who arranged for the disposal or treatment of hazardous substances at the Site, or the transport of hazardous substances to the Site.

In recognition of our complementary roles, EPA has formed a partnership with USACE and the New Jersey Department of Transportation-Office of Maritime Resources ("OMR") ["the governmental partnership"] to identify and address water quality improvement, remediation, and restoration opportunities in the 17-mile Lower Passaic River Study Area. This governmental partnership is consistent with a national Memorandum of Understanding ("MOU") executed on July 2, 2002 between EPA and USACE. This MOU calls for the two agencies to cooperate, where appropriate, on environmental remediation and restoration of degraded urban rivers and related resources. In agreeing to implement the MOU, the EPA and USACE will use their existing statutory and regulatory authorities in a coordinated manner. These authorities for EPA include CERCLA, the Clean Water Act, and the Resource Conservation and Recovery Act. The USACE's authority stems from the Water Resources Development Act ("WRDA"). WRDA allows for the use of some federal funds to pay for a portion of the USACE's approved projects related to ecosystem restoration.

For the first phase of the Lower Passaic River Restoration Project, the governmental partners are proceeding with an integrated five-to-seven-year study to determine an appropriate remediation and restoration plan for the river. The study will involve investigation of environmental impacts and pollution sources, as well as evaluation of alternative actions, leading to recommendations of environmental remediation and restoration activities. The study is being conducted pursuant to CERCLA and WRDA.

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were released from the Automatic Electro Plating Corp. facility located at 185 Foundry Street in Newark, New Jersey, into the Lower Passaic River Study Area. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, Automatic Electro Plating Corp. may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

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

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

Enclosed is a list of the other PRPs who have received notices of potential liability. This list represents EPA's findings on the identities of PRPs to date. We are continuing efforts to locate additional PRPs who have released hazardous substances, directly or indirectly, into the Lower Passaic River Study Area. Exclusion from the list does not constitute a final determination by EPA concerning the liability of any party for the release or threat of release of hazardous substances at the Site. Please be advised that notice of your potential liability at the Site may be forwarded to all parties on this list as well as to the Natural Resource Trustees.

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

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

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

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

Written notification should be provided to EPA and Mr. Hyatt documenting your intention to join the Group and settle with EPA no later than 30 calendar days from your receipt of this letter. The result of any agreement between EPA and your Company as part of the Group will need to

be memorialized in an Administrative Order on Consent. Your written notification to EPA should be mailed to:

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

Pursuant to CERCLA Section 113(k), EPA must establish an administrative record that contains documents that form the basis of EPA's decision on the selection of a response action for a site. The administrative record file and the Site file are located at EPA's Region 2 Superfund Records Center, at 290 Broadway, New York, NY, on the 18th floor. You may call the Records Center at (212) 637-4308 to make an appointment to view the administrative record and/or the Site file for the Diamond Alkali Site, Passaic River.

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

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at **www.epa.gov.** In addition, the EPA Small Business Ombudsman may be contacted at **www.epa.gov/sbo.** Finally, EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act, which is enclosed with this letter.

Inquiries by counsel or inquiries of a legal nature should be directed to Ms. Flanagan at (212) 637-3136. Questions of a technical nature should be directed to Elizabeth Butler, Remedial Project Manager, at (212) 637-4396.

Sincerely yours,

Ray Basso, Strategic Integration Manager
Emergency and Remedial Response Division

Enclosures 6-06

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

JUN - 8 2006

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

Gerald Boriello, President
Foundry Street Corporation
260 Knoll Drive
Park Ridge, NJ 07656

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

Dear Mr. Boriello:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release and/or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq. EPA is seeking your cooperation in an innovative approach to environmental remediation and restoration activities for the Lower Passaic River.

EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the six-mile stretch of the river known as the Passaic River Study Area, which is part of the Diamond Alkali Superfund Site ("Site") located in Newark, New Jersey. Based on the results of previous CERCLA remedial investigation activities and other environmental studies, including a reconnaissance study of the Passaic River conducted by the United States Army Corps of Engineers ("USACE"), EPA has further determined that contaminated sediments and other potential sources of hazardous substances exist along the entire 17-mile tidal reach of the Lower Passaic River. Thus, EPA has decided to expand the area of study to include the entire Lower Passaic River and its tributaries from Dundee Dam to Newark Bay ("Lower Passaic River Study Area").

By this letter, EPA is notifying Foundry Street Corporation of its potential liability relating to the Site pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Under CERCLA, potentially responsible parties ("PRPs") include current and past owners and operators of a facility, as well as persons who arranged for the disposal or treatment of hazardous substances at the Site, or the transport of hazardous substances to the Site.

In recognition of our complementary roles, EPA has formed a partnership with USACE and the New Jersey Department of Transportation-Office of Maritime Resources ("OMR") ["the governmental partnership"] to identify and address water quality improvement, remediation, and restoration opportunities in the 17-mile Lower Passaic River Study Area. This governmental partnership is consistent with a national Memorandum of Understanding ("MOU") executed on July 2, 2002 between EPA and USACE. This MOU calls for the two agencies to cooperate, where appropriate, on environmental remediation and restoration of degraded urban rivers and related resources. In agreeing to implement the MOU, the EPA and USACE will use their existing statutory and regulatory authorities in a coordinated manner. These authorities for EPA include CERCLA, the Clean Water Act, and the Resource Conservation and Recovery Act. The USACE's authority stems from the Water Resources Development Act ("WRDA"). WRDA allows for the use of some federal funds to pay for a portion of the USACE's approved projects related to ecosystem restoration.

For the first phase of the Lower Passaic River Restoration Project, the governmental partners are proceeding with an integrated five-to-seven-year study to determine an appropriate remediation and restoration plan for the river. The study will involve investigation of environmental impacts and pollution sources, as well as evaluation of alternative actions, leading to recommendations of environmental remediation and restoration activities. The study is being conducted pursuant to CERCLA and WRDA.

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were released from the Automatic Electro Plating Corporation facility located at 185 Foundry Street in Newark, New Jersey, into the Lower Passaic River Study Area. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, Foundry Street Corporation, as owner of the facility at 185 Foundry Street leased and operated by Automatic Electro Plating Corporation, may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at the Site may be substantially limited. If you believe, and can document, that you fall within that category, please inform Sarah Flanagan and William Hyatt in writing at the addresses identified below in this letter. You will be asked to submit financial records including

federal income tax returns as well as audited financial statements to substantiate such a claim.

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

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

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

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

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The result of any agreement between EPA and your Company as part of the Group will need to be memorialized in an Administrative Order on Consent. Your written notification to EPA should be mailed to:

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Sincerely yours,

R. Basso

Ray Basso, Strategic Integration Manager
Emergency and Remedial Response Division

Enclosures 6-06