

PRELIMINARY ASSESSMENT

IDEAL PLATING AND POLISHING COMPANY, INC.
BELLEVILLE, ESSEX COUNTY
EPA ID NO. NJD087280038

EDC000284



New Jersey Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
Bureau of Field Operations - Site Assessment Section

NARRATIVE

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PRELIMINARY ASSESSMENT REPORT

PART I: GENERAL INFORMATION

Site Name: Ideal Plating and Polishing Company, Inc.
AKa: Belleville Industrial Center
Address: 681 Main Street
Municipality: Belleville State: NJ Zip Code: 07109
County: Essex
EPA ID No.: NJD087280038
Block: 108 Lot: 20
Latitude: 40° 48' 24" Longitude: 74° 08' 26"
Acreage: 15 SIC Code: 3471 (Plating/Polishing)

Current Owner: Belleville Industrial Center
Mailing Address: 681 Main Street
City: Belleville State: NJ Zip Code: 07109
Telephone No.: (201) 751-0360
Block: 56 Lot(s): 5, 6, 7, 9, 31
Block: 108 Lot(s): 10, 12, 20, 50, 60, 62

Current Operator: Ideal Plating and Polishing Company, Inc.
Mailing Address: 681 Main Street, P.O. Box 100
City: Belleville State: NJ Zip Code: 07109

Owner/Operator History:

<u>NAME</u>	<u>OPERATOR OWNER</u>	<u>FROM</u>	<u>DATES TO</u>
Belleville Industrial Center	Owner	7/2/68	Present
Air Reduction Co. (A New York Corp.)	Owner	12/30/66	7/2/68
Cumberland Chemical Co. (A Delaware Corp.)	Owner	4/30/62	12/30/66
Textron Corp. (A Delaware Corp.)	Owner	3/23/60	4/30/62
Main Street Corporation	Owner	?	3/23/60

Surrounding Land Use (zoning, adjacent properties):

Mixed industrial/commercial/residential zoning. Residential units are directly adjacent to the site.

Distance to Nearest Residence: Adjacent
Direction: North

Population Density (residents per square mile): There are 10,230 residents per square mile per the 1990 census data.

DDC0000286

PART II: SITE OPERATIONS

Discuss all current and past operations at the site.

Ideal Plating and Polishing Company, Inc. (Ideal), is located within the Belleville Industrial Center (The Center). Ideal's 1992 annual corporate report lists Norman A. Cohen of 149 Kearny Avenue in Perth Amboy as its registered agent and Ronald Knigge as a corporate officer. The annual report for The Center confirms that it has been a New Jersey corporation since June 6, 1968 and that Lynn Clurman is a corporate officer and registered agent.

The blocks and lots which comprise The Center were formerly the site of an artificial leather and fabric dying factory called Federal Leather Co. Inc. (Federal). Based on the A. H. Mueller Co. Map dated 1906 and the State of New Jersey Industrial Directory for Essex County (NJID) dated 1931, the site was farmland owned by the Schaeffer family in 1906. According to "The History of Belleville", written by Richard Shafter, Federal founded the industrial site at the former Schaeffer property in 1916. The Mueller Map shows that Block 108, Lot 100 and 35 (now adjacent to Ideal) was being developed into the Sonnenborn Sons, Inc. "chemical works". The History of Belleville states that the Sonnenborn facility was involved in the production of paints, industrial finishes, white oil, petrolatums, floor hardeners and waterproofing agents. The book also states that the Federal facility was originally a leather tanning facility until it added the production of artificial leather in 1922. When the facility was destroyed during a 1924 fire, it was rebuilt and exclusively devoted to the production of artificial leather.

The 1938 Sanborn Company Insurance Map of Belleville shows that Federal covered all of Block 56, Lots 5, 6, 7, 9 and 31. The Sanborn Map shows that Federal contained a foundry, a wire rope factory, numerous solvent/fuel/naphtha tanks, a dye grinding shop, a lacquer storage facility, a varnishing and drying shop, a dope mixing shop, a chemical storage area, a dye house and a solvent recovery shop. A 1950 Sanborn Map of the Federal site documents that the facility had expanded into Block 108, Lots 10, 12, 20, 50, 60 and 62 by 1950, as supported by the New Jersey Department of Environmental Protection and Energy's (NJDEPE) Bureau of Field Operations - Site Assessment (BFO-SA) observations of aerial photographs dated April 7, 1951. The 1959 NJID lists Federal Industries, a Division of Textron Inc., at the same address as Federal and sharing the same company principals. The NJID indicated that Federal Industries produced the same products as Federal. By 1962, Federal was no longer listed in the NJID, and in 1963, Federal Industries became a division of Air Reduction Co. (ARC). In the 1964 NJID, another division of ARC, Airco Plastic Products, was operating at the same address as Federal Industries, and was listed as producing the same products plus injection molded vinyl parts. By 1967, Federal Industries was no longer listed in the NJID, and Airco Plastic Products was replaced by Airco Chemicals and Plastics. The 1968 deed for the property documents

DDC000287

that ARC sold the site to the Belleville Industrial Center.

During a July 19, 1993 site investigation by BFO-SA, Captain Vicari of the Belleville Fire Department (BFD) stated that he was aware of a number of fires at the Federal facility during the 1960s. He recalled one relatively serious fire which occurred in a drying room and was accelerated by volatile compounds used in the process. Captain Vicari also stated that methyl ethyl ketone was dumped by employees who used the substance to wash parts. Files to support Captain Vicari's recollections were not viewed by BFO-SA personnel. However, files from the 1980s documented spills and fires at the site as follows: a March 20, 1980 report of fire at Synfax Manufacturing Co. which involved a "isoparaffinic petroleum solvent"; a June 29, 1981 report of fire at Ideal Plating and Polishing Co. involving three polypropylene vats, one of which was empty (contents of other two not discussed); a June 13, 1983 report of fire involving a wooden structure 100 feet east of building #36. The report noted that "young boys" were seen playing in the facility.; a June 20, 1983 letter which states that a fire department task force had inspected The Center and that BFD personnel had issued violation notices to The Center; and, an October 7, 1987 report of a diesel fuel spill at The Center which was absorbed with two bags of Speedy Dry.

The Center leases buildings to a variety of industries. Some of the former or current tenants have files with BFO. A partial list of current and former tenants are as follows: Display Corp.; Synfax Mfg. Inc.; Helion Industries, Inc.; G.E. Richards Graphic Supply; Techna Corporation; Compustruct, Inc.; Renaissance Flowers; Sun Chemical; Hytest; Tech Finishing Co.; and, Costa's Cabinets. On January 2, 1991, two soil borings of twenty feet each were completed at The Center.

Ideal has operated at building #40 within The Center since February 1979. The 1990 Business Journal's Directory stated that Ideal had sales between one and five million dollars in 1990 and that the president of Ideal was Mr. Ron Knigge. The 1992 Corfacts Directory of Manufacturing noted that a related facility, called Independence Plating, is operated in Paterson and engaged in the electroplating of aerospace and computer parts. The noted directory also lists Ideal as providing electroplating services for aerospace and computer industries. The New Jersey Industrial Directory indicates that Mr. Knigge became president of Independence Plating in 1985.

DDC000288

The Right to Know survey submitted by Ideal on February 16, 1993 states that the company has ten employees. The noted survey lists hazardous substances stored on site in terms of daily averages by weight. A partial list of same is as follows:

<u>Material</u>	<u>Weight</u>	
Sodium Cyanide	100	- 1,000 lbs.
Cadmium Cyanide	100	- 1,000 lbs.
Copper Cyanide	10	- 100 lbs.
Silver Cyanide	10	- 100 lbs.
Potassium Cyanide	100	- 1,000 lbs.
Potassium Hydroxide	100	- 1,000 lbs.
Chromic Acid	10	- 100 lbs.
Acrylic Acid	100	- 1,000 lbs.
Hydrofluoric Acid	100	- 1,000 lbs.
Hydrochloric Acid	1,000	- 10,000 lbs.
Sulfuric Acid	100	- 1,000 lbs.
Phosphoric Acid	100	- 1,000 lbs.
Ethyl Diamine	10	- 100 lbs.
Methyl Alcohol	1,000	- 10,000 lbs.
Ammonium Fluoride	100	- 1,000 lbs.
Nickel Salts	1,000	- 10,000 lbs.

The NJDEPE's files on Ideal begin with the October 3, 1979 inspection of the facility by the Bureau of Air Pollution Control (BAP). Observations during that inspection led to the issuance of a December 17, 1979 Order to cease the use of air pollution control equipment without a certificate. In part, the Order noted the venting of a perchloroethylene vapor degreaser as a violation. On June 25, 1980, certificates were issued to Ideal by NJDEP. However, on January 26, 1984, Orders were again issued to Ideal by BAP for operating the vapor degreaser without the necessary certificate. Subsequent to observations during an August 10, 1984 field investigation by BAP personnel, an August 27, 1984 Notice of Prosecution (NOP) was issued to Ideal for the vapor degreaser violation. An October 5, 1984 investigation by BAP indicated that Ideal had substituted 1,1,1-trichloroethane in their degreaser.

DDC000289

After a March 8, 1985 letter from BAP disapproved Ideal's application to operate the perchloroethylene degreaser, an April 17, 1985 inspection by BAP revealed that Ideal had discontinued use of the degreaser and substituted an alkaline water based cleaning solution in its place. Inspections on November 11, 1991 and February 3, 1993 did not reveal violations by Ideal of air pollution regulations.

The BFO Metro Field Office (BFO-M) hazardous waste file revealed that in 1980, Ideal had filed with the US Environmental Protection Agency (USEPA) as a generator of hazardous waste. The documents submitted to USEPA indicate that Ideal began operations on December 29, 1978 as an industrial electroplater "of electronic components, primarily precious metals such as Gold & Silver." At the time, Ideal reported that they generated wastes including spent non-halogenated solvents, xylene, methyl alcohol and cyanide plating baths. However, the documents also note that Ideal intended to phase out cyanide related effluent.

In a November 15, 1982 letter from BFO-M, Ideal was notified that it must submit a hazardous waste annual report for its activities as a hazardous waste treatment, storage and disposal facility. An inspection by BFO-M on April 30, 1986 revealed that Ideal discharged all of its wastes to Passaic Valley Sewerage Commissioners (PVSC) pursuant to a valid permit and therefore should not be subject to hazardous waste generator and treatment requirements. By memo dated May 18, 1988, NJDEP's Bureau of Hazardous Waste Engineering indicated that it was prepared to exempt Ideal from hazardous waste regulations if said facility was declared an industrial waste management facility pursuant to N.J.A.C. 7:14A-4 et seq. Ideal submitted a notice of exemption to NJDEP for the 1990 reporting period for hazardous waste activities due to a lack of waste generated. In a letter dated June 29, 1991, Ideal notified NJDEP and PVSC of the levels of hazardous waste found in their wastewater. By memo dated August 13, 1991, NJDEP concluded that Ideal should not be regulated pursuant to N.J.A.C. 7:26-1 et seq. The same memo describes the cyanide destruction treatment which all cyanide wastewaters from Ideal undergo prior to discharge to PVSC.

By letter dated September 14, 1992, BFO-SA requested that Ideal conduct an investigation of the facility and property it controls. By letter dated October 14, 1992, Ideal informed BFO-SA that there have been no discharges or violations at the facility and they would therefore not conduct an investigation.

On June 7, 1993, an inspection of Ideal was conducted by BFO-SA. Touring the site with BFO-SA was the Chemist for Ideal, Mr. Vincent Elkind, who described the origin and destination of waste streams produced by Ideal and who provided the undated portion of a Sanborn Map of the facility. Mr. Elkind stated that in terms of the waste stream produced by the facility, the predominant contaminants are tin, lead, copper and nickel. The minor components of the waste stream are zinc, cadmium, silver, gold and chromium. Per Mr.

DDC000290

Elkind, raw materials as noted above are mixed in open vats to produce numerous plating solutions, or pre-mixed solutions are simply added to the vats. Metallic parts are then dipped into the vats to achieve a plated product. As the parts are retrieved from the vats, solution is dripped on floors and various appurtenances to the production line. Any such dripping or other spills which do not evaporate will flow to a central trench which runs most of the length of building #40. The trench, which is partially filled with a fine, light colored precipitate from production, has never been inspected or cleaned since the start of operations according to Mr. Elkind. Limited probing of the trench with an auger indicated that the trench bottom was corroded but intact. Per Mr. Elkind, all waste solutions are discharged to the trench, which passes through a concrete pit prior to discharge to the Passaic Valley Sewerage Commissioner's facility (PVSC). In accordance with the PVSC discharge permit, the pit is sampled by automated devices for metals, pH, cyanide and other parameters. Mr. Elkind stated that Ideal was in compliance with the noted permit and that no other wastes are generated. This assertion is supported by Mr. Tom Mack, of PVSC, who stated that Ideal was not a problem facility.

Also observed during the noted inspection, in the southernmost portion of building #40, was an open drum of hydrochloric acid at a section of a badly corroded concrete floor which still seemed intact. BFO-SA personnel also observed a green solution which had flooded a section of the floor due to a spill of nickel solution from a ruptured drum. The spill had entered building 39A which contained a drum of potassium cyanide. Outside the facility, four full drums were observed at the site of a oil spill to macadam. Of the four drums, only one was marked. The noted drum, which was covered in oil, had "slushing oil" scrawled on it. At the southern extent of building #40, a spill of automotive waste oil to soil was observed at the fence which separates The Center from the railroad tracks. Oil filters were observed on both sides of the fence. Finally, a powder-like particulate was observed in a graveled lot between building #40 and a quonset hut.

During the July 19, 1993 inspection by BFO-SA, the graveled lot next to the quonset hut was observed again as were soils at other locations. It was noted that the soils in other locations contained a large amount of dry, very fine particulates with no cohesion. A conversation with Mr. Elkind and Mr. Thompson of Ideal during the July 19, 1993 inspection did not explain how Ideal obtained an underground storage tank number, although they speculated that it may be for the above noted concrete pit. Mr. Elkind stated that one of the courtyards between building #40 and building #42 could only be accessed by a window and that the large one was accessible by a door.

Inspection of the large courtyard revealed that it was graveled, but had 2 inches of leaf litter over most areas. A number of empty blue plastic jugs and numerous empty 5 gallon roof tar pails were strewn in the courtyard, some partially covered with leaf litter. One of the blue plastic jugs bore Ideal's name. Two unmarked drums

DDC000291

were observed next to a cast iron grated drain in the middle of the courtyard. A 1 inch diameter steel pipe was observed with it's discharge end oriented down through the grate. The pipe extended from the grate to the eastern wall of building #40 and extended hence along said wall towards the north end of building #40 for about 30 feet at which point it ended with a 90 degree turn upward and the last fitting being half of a union. Approximately 20 feet north of the end of the noted pipe, a larger steel pipe extended from Ideal and was oriented downward. Another pipe was observed extending from a building between Ideal and building #42. This pipe was 1 inch in diameter, was oriented downward and was discharging a colorless liquid with no odor. Five small test pits were dug by shovel in the courtyard. One was located in the drain and encountered 2 feet of leaf litter and soil before encountering a green/blue material and a tan, grease-like substance in the last 3 inches above the flat, hard bottom of the drain. Directly next to the drain, an empty 55 gallon drum lay on its side. Under the drum, the soil and gravel was observed to have a green/blue color. The other location where green/blue color was observed was near the door which led into Ideal. In one location examined, the leaf litter was absent and the soil was dry. The soil associated with this dry spot was powder-like and not cohesive.

During the July 19, 1993 inspection, BFO-SA personnel interviewed Mary Quartarolo, Property Manager for the Arbor Hills residential units adjacent to The Center. According to Ms. Quartarolo, the entire residential property is owned by 432 Owners Inc. which retains Ms. Quartarolo's employer, Wellsley Property Management, Inc. to manage the common grounds of the property. Ms. Quartarolo stated that the site was developed into apartments about 20 years ago and changed to privately owned co-ops about six years ago. The aerial photograph observations by BFO-SA revealed that condominiums were built on the Sonnenborn site between May 14, 1971 and 1974.

Finally, a sketch was viewed during the July 19, 1993 inspection. The sketch (a site plan for The Center) was dated July 10, 1968 and drawn by J. Thomas Camlet & Sons of Clinton, New Jersey. It depicted a pump house on the east side of Main Street and made the following statement: "agreement for use of Passaic River water four outlet sewers to Passaic River."

PART III: PERMITS

A. NJPDES

There is no NJPDES permit listed for this facility.

B. New Jersey Air Pollution Control Certificates

Plant ID No.: 05980
No. of Certificates: Two: 046977 & 046978
Equipment Permitted: Seven Exhaust Fans

DDC000292

C. BUST Registration

NJDEPE's Bureau of Underground Storage Tanks (BUST) records a tank registration number of 0150077 for Ideal, but records show that Ideal has no tanks. A BUST representative has explained that this is most likely due to the registration of non-regulated tank(s) by Ideal.

D. Other Permits

<u>Agency Issuing Permit</u>	<u>Type of Permit</u>	<u>Permit No.</u>	<u>Date Issued</u>	<u>Expiration Date</u>
Passaic Valley Regional Sewerage Commissioners	Industrial sewer discharge	01403600	10/20/86	Current

PART IV: GROUNDWATER ROUTE

A. HYDROGEOLOGY

Describe geologic formations and aquifer(s) of concern. Include interconnections, confining layers, discontinuities, composition and permeability.

The site lies within the Piedmont Plateau, of the Appalachian Province. The Piedmont Plateau becomes a plain as it approaches the Essex County area, and in the vicinity of Belleville, it falls to sea level. The subject site is approximately 1,100 feet from the Passaic River and lies on a slope of approximately 5 percent. It is between 20 and 60 feet in elevation above mean sea level. The site is located in Belleville, which rests on three layers of sedimentary rock of Triassic age which are collectively known as the Newark Group. The Brunswick Formation, which is the uppermost layer, is predominated by red shale but includes sandstone and conglomerate. Prior to the last set of glacial advances into New Jersey, faulting of the Newark group created numerous ridges. The erosion of these features produced a system of valleys. During the Pleistocene glacial advances, vast amounts of glacial and fluvial sediments were deposited in these valleys, creating the unconsolidated deposits which have been described along the Passaic river adjacent to Ideal. The sediments, which are composed of clay, sands, gravel and boulders, can be found in stratified or unstratified conditions. Overlying this glacial drift in some areas are recent alluvial deposits or meadow mat. At the site, BFO-SA personnel observed silt to very fine sands at the surface. These soils would tend to have a relatively low permeability.

Depth to aquifer of concern: 20 feet
Thickness of aquifer: Unknown
Direction of groundwater flow: East
Karst (Y/N): No
Wellhead Protection Area (Y/N): No

DDC000293

B. MONITORING WELL INFORMATION

Although two borings were completed at this site, there are no monitor wells installed at this site.

C. POTABLE WELL INFORMATION

Identify all public supply wells within 4 miles of the site:

<u>Water Company</u>	<u>Distance from site (miles)</u>	<u>Depth (feet)</u>	<u>Formation</u>
Bloomfield Town	2.7	380	Brunswick
Wallington Boro	3.6	400	"
Wallington Boro	3.5	503	"
Wallington Boro	3.5	504	"
Montclair Town	3.7	300	"
Montclair Town	3.8	300	"
Glen Ridge Water Department	3.3	400	"

Discuss private potable well use within 4 miles of the site. Include depth, formation and distance, if available.

Potable water within Belleville and Bloomfield is supplied by Newark which obtains its water from the Pequannock system of reservoirs. Potable water used in Glen Ridge and Montclair is from the above noted Montclair wells, which are within 4 miles of the subject site. Montclair also sells its treated water to the West Caldwell franchise of New Jersey American Water Company. Wallington Borough does not use its wells but has an agreement with The Passaic Valley Water Commission (PVWC). All PVWC water is derived from surface water. Mountainside Hospital in Glen Ridge also has a well which serves hospital staff and patients only. The well is approximately 350 feet deep.

<u>Distance (mile)</u>	<u>Population</u>
0 - 1/4	0
1/4 - 1/2	0
1/2 - 1	0
1 - 2	0
2 - 3	90,000
3 - 4	160,000

Discuss any evidence of contaminated drinking water or wells closed due to contamination.

The Bloomfield well noted above is reportedly not in use due to unacceptable cloudiness. The Montclair wells are impacted by an unknown source of volatile organic compounds, but analytical monitoring has demonstrated that Montclair's treatment system achieves regulatory quality standards. The Glen Ridge well is not in use due to trichloroethylene contamination. The Mountainside

DDC000294

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DDC000295

well is impacted by trichloroethylene at concentrations below regulatory quality standards. All wells in Wallington Borough have been shut down due to trichloroethylene and tetrachloroethylene contamination. The Superintendent of Public Works in Wallington Borough stated that local officials suspect the contamination originated from sites other than the subject site.

Identify industrial/irrigational wells within the vicinity of the site. Include depth, formation, distance and direction, if available.

There are numerous industrial wells in the vicinity of this site. See map 5, Water Withdrawal Points.

D. POTENTIAL

Discuss the potential for groundwater contamination, including any other information concerning the groundwater contamination route.

Due to the actual impacts noted above, this field was not assessed.

PART V: SURFACE WATER ROUTE

A. SURFACE WATER

Does a migration pathway to surface water exist (Y/N):

Yes. Run-off from this facility can enter the Passaic River via storm drains.

Flood plain: greater than 500 years Slope: Five percent

Does contaminated groundwater discharge to surface water?
Unknown.

Identify known or potentially contaminated surface water bodies. Follow the pathway of the surface water and indicate all adjoining bodies of water along a route of 15 stream miles.

The site is adjacent to the Passaic River which has received discharges from many industrial and domestic sources since the beginning of the industrial revolution. The 1968 site plan noted in Part II of this report indicates that there were discharges from The Center to the Passaic. The Passaic River extends south for approximately 8 miles prior to discharging to Newark Bay. The Passaic is adjoined by the Second River near the boundary between Belleville and Newark.

Identify drinking water intakes within 15 miles downstream (or upstream in tidal areas) of the site. For each intake identify the distance from the point of surface water entry, the name of the supplier and population served.

According to the March 1992 Surface Water Intake Locations by the

DDC000296

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According to the March 1992 Surface Water Intake Locations by the

DDC0000297

NJDEPE's Bureau of Safe Drinking Water, there are no downstream surface water intakes in the Passaic River.

Briefly discuss surface water or sediment sampling conducted in relation to the site. Discuss visual observations if analytical data is not available (include date of observation). Include surface water body, sampling date, sampling agency or company, contaminant.

This review did not discover surface water or sediments sampling relative to this site.

Discuss the potential for surface water contamination, include any additional information concerning the surface water route.

Surface water contamination may occur during fires due to runoff, or due to spills to the storm drain system.

B. SENSITIVE ENVIRONMENTS

Identify all sensitive environments, including wetlands, along the 15 stream-mile pathway from the site:

According to the United States Fish and Wildlife Service Wetlands Inventory maps, the subject section of the Passaic River has estuarine intertidal flats and sub-tidal open water.

PART VI: AIR ROUTE

Discuss observed or potential air release.

There are cyanides and acids at Ideal which pose an air release threat in the event of a fire. There are vapors of methyl alcohol and various plating solutions which are discharged to the atmosphere daily under the noted BAC certificates.

Populations that reside within 4 miles of the site.

<u>Distance (mile)</u>	<u>Population</u>
0 - 1/4	2,500
1/4 - 1/2	5,000
1/2 - 1	10,000
1 - 2	40,000
2 - 3	90,000
3 - 4	160,000

Identify sensitive environments and wetland acreage within 1/2 mile of the site.

The site, which is adjacent to the Passaic River, could pose a threat to riverine and estuarine inhabitants of the river and its tidal flats.

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PART VII: SOIL EXPOSURE

Describe soil type. Include soil series, makeup of the soil and permeability of the soil.

The surface soil in the Newark area is primarily comprised of glacially derived sediments. The soils at this site are tan to red and primarily a silt with very fine sand. This is indicative of weathered rock from the Brunswick Formation which has a low permeability.

Briefly discuss contaminants identified in the soil. Include sampling date, sampling agency or company, sample locations, depth and contaminant level.

There is no known soil sampling results.

If no soil sampling has been conducted, discuss areas of potentially contaminated soil, areas that are visually contaminated or results from soil gas surveys.

Surface soil has visual characteristics which indicate waste oil and plating bath spillage. In the case of the waste oil, automotive oil filters were observed in close proximity, supporting the conclusion that waste oil was discharged. In the case of the suspected plating bath discharges, the conclusion that discharges have occurred is based upon similar color and the presence of raw materials containers in the courtyard. The dust-like condition of the soil next to the quonset hut is suspected to be due to silt characteristics rather than indicative of sludge disposal.

Number of people that occupy residences or attend school or day care on or within 200 feet of the site: 600 people
Number of workers on or within 200 feet of the site: 150 workers

Does a subsurface gas threat exist? (Y/N): No. Relative to the materials used by Ideal, the potential for such a threat does not exist.

PART VIII: DIRECT CONTACT

Describe accessibility of the site (fencing, site security, evidence of unauthorized entry).

The site is active and completely fenced, but a gate to the railroad tracks was observed to be open during the July 19, 1993 inspection. Unauthorized access to the site is likely in light of the noted June 13, 1983 fire report which documented "young boys" on-site.

Number of on-site employees: Ten

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PART IX: FIRE AND EXPLOSION

Discuss all incidents on site which have involved a fire or explosion. Indicate the date of the incident and the materials involved.

There is one known incident of fire at Ideal as noted in Part II of this report as follows: June 29, 1981 report of fire at Ideal Plating and Polishing Co. involving three polypropylene vats, one of which was empty (contents of other two not discussed).

Discuss site conditions which indicate a potential exists for fire or explosion (reactivity, incompatibility, ignitability, storage practices, container condition).

The potential for fire is significant due to the presence of flammable substances and heating elements for plating solutions. This was the cause of the above noted 1981 fire.

PART X: ADDITIONAL CONSIDERATIONS

Discuss evidence of wildlife or vegetation that has been or could be potentially impacted by on-site operations. Include areas exhibiting stressed vegetation or damage to wildlife.

Aside from the potential surface water and estuarine species, the area (located in an industrial setting) has no wildlife, crop or forest environments to impact.

Determine if a contaminant on site displays bioaccumulative properties. Name all bioaccumulative substances that may impact the food chain.

There are no known bioaccumulative contaminants.

Discuss observed or potential damage to off-site property. Consider migration routes from the site to an off-site property via soil, air or runoff.

Aside from the threat of cyanide or other degeneration compounds to neighbors in the event of a fire or accident, Ideal does not pose a threat to damage off-site property via soil, air or runoff.

PART XI: PREVIOUS OR ONGOING REMEDIAL ACTIONS

Discuss for each media all previous and ongoing remedial activities at the site. Include why initiated, type of action, date and present status.

There have been no known remedial activities taken by Ideal.

DDC000300

PART XII: ENFORCEMENT ACTIONS

1. Type of enforcement activity: Order to cease operation of equipment without permit
Issuing agent: Bureau of Air Pollution Control
Date: December 17, 1979
Description of Violation: operation of equipment without permit
Followup activity: Certificates Issued
2. Type of enforcement activity: Order to cease operation of equipment without permit
Issuing agent: Bureau of Air Pollution Control
Date: January 26, 1984
Description of Violation: operation of equipment without permit
Followup activity: Process change by Ideal achieved compliance.
3. Type of enforcement activity: Notice of Prosecution for operating equipment without permit
Issuing agent: Bureau of Air Pollution Control
Date: August 27, 1984
Description of Violation: operation of equipment without permit
Followup activity: Penalty paid. No Further Action.

PART XIII: CONCLUSIONS AND RECOMMENDATIONS

Ideal has apparently contributed to soil contamination at The Center. The contamination appears to be limited to the courtyard, which is very isolated, and therefore the direct contact threat in this instance is very low. The apparent discharge to the courtyard drain would appear to be the most serious contamination threat.

However, it is suspected that more widespread contamination may exist at The Center and the neighboring Arbor Hills from the described industrial activities beginning at the early part of this century. It is therefore recommended that any site investigation sampling at Ideal proceed under a unified sampling event for The Center. It is also recommended that a Preliminary Assessment be conducted for the former L. Sonnenborn and Sons, Inc. site.

Submitted by: Nick Sodano
Title: Hazardous Site Mitigation Specialist II
NJDEPE, Bureau of Field Operations - Site Assessment Section
Date: July 28, 1993

DDC000301

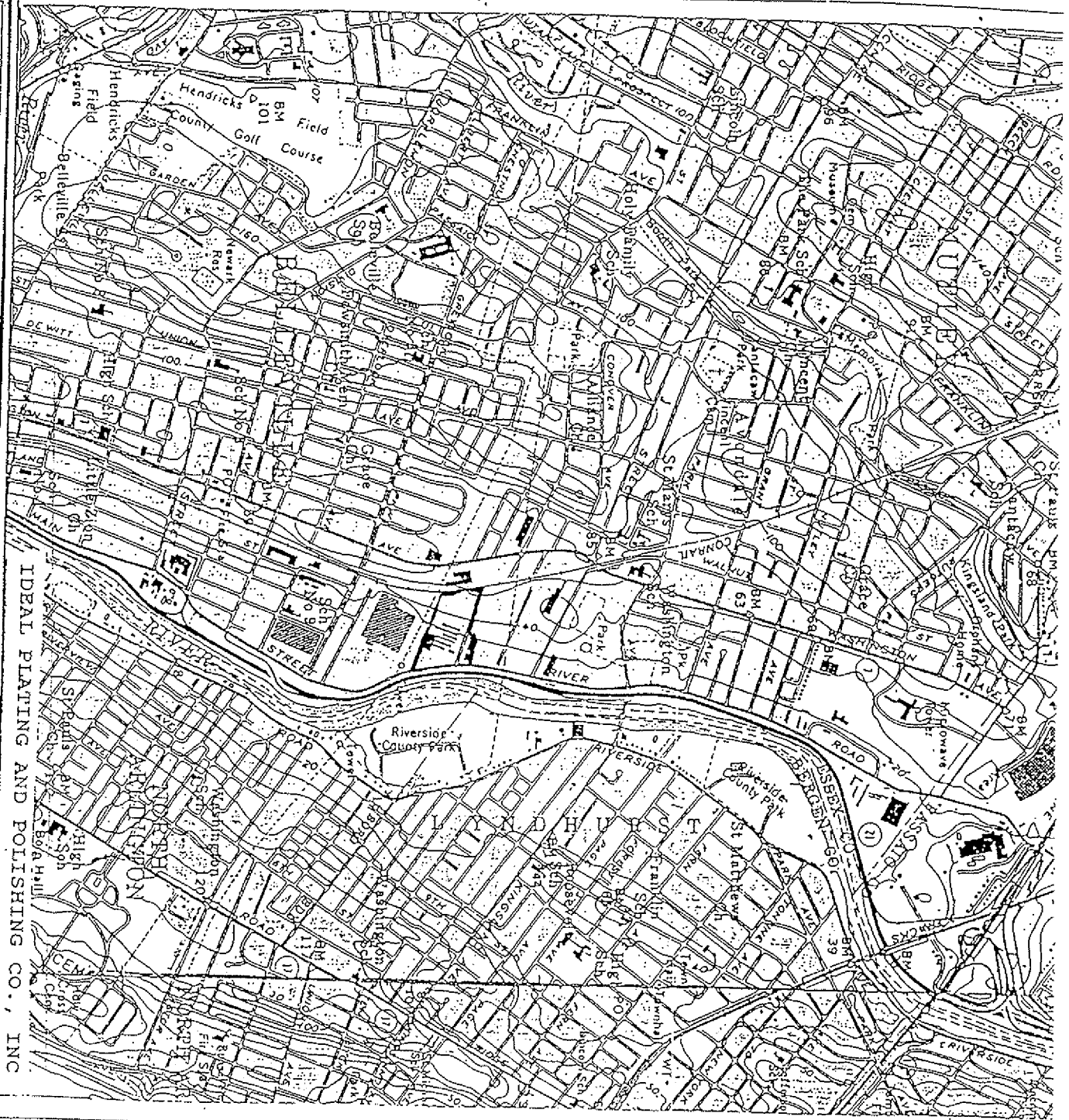
MAPS

DDC000302

SCALE 1:24000

IDEAL PLATING AND POLISHING CO., INC

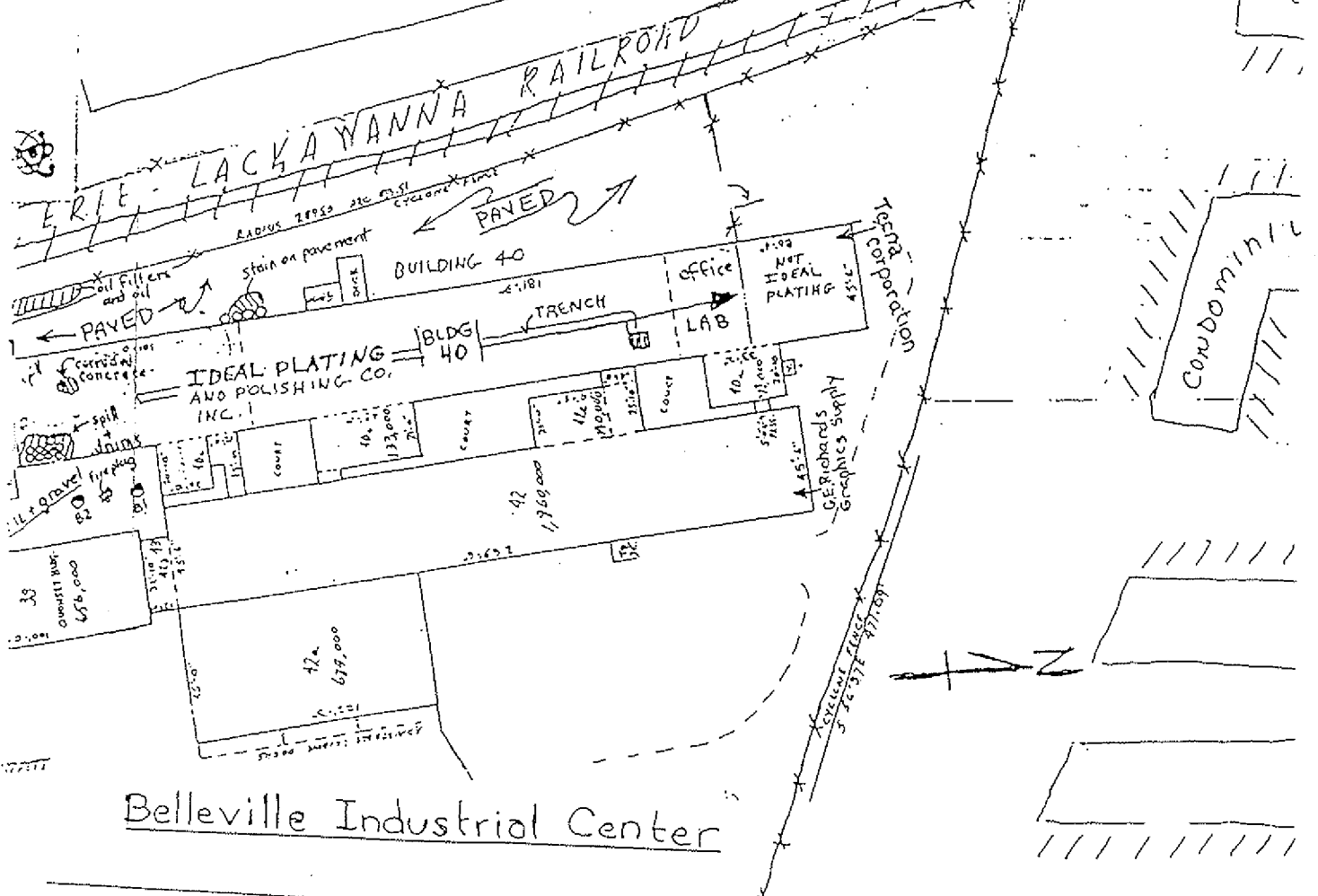
ORANGE N

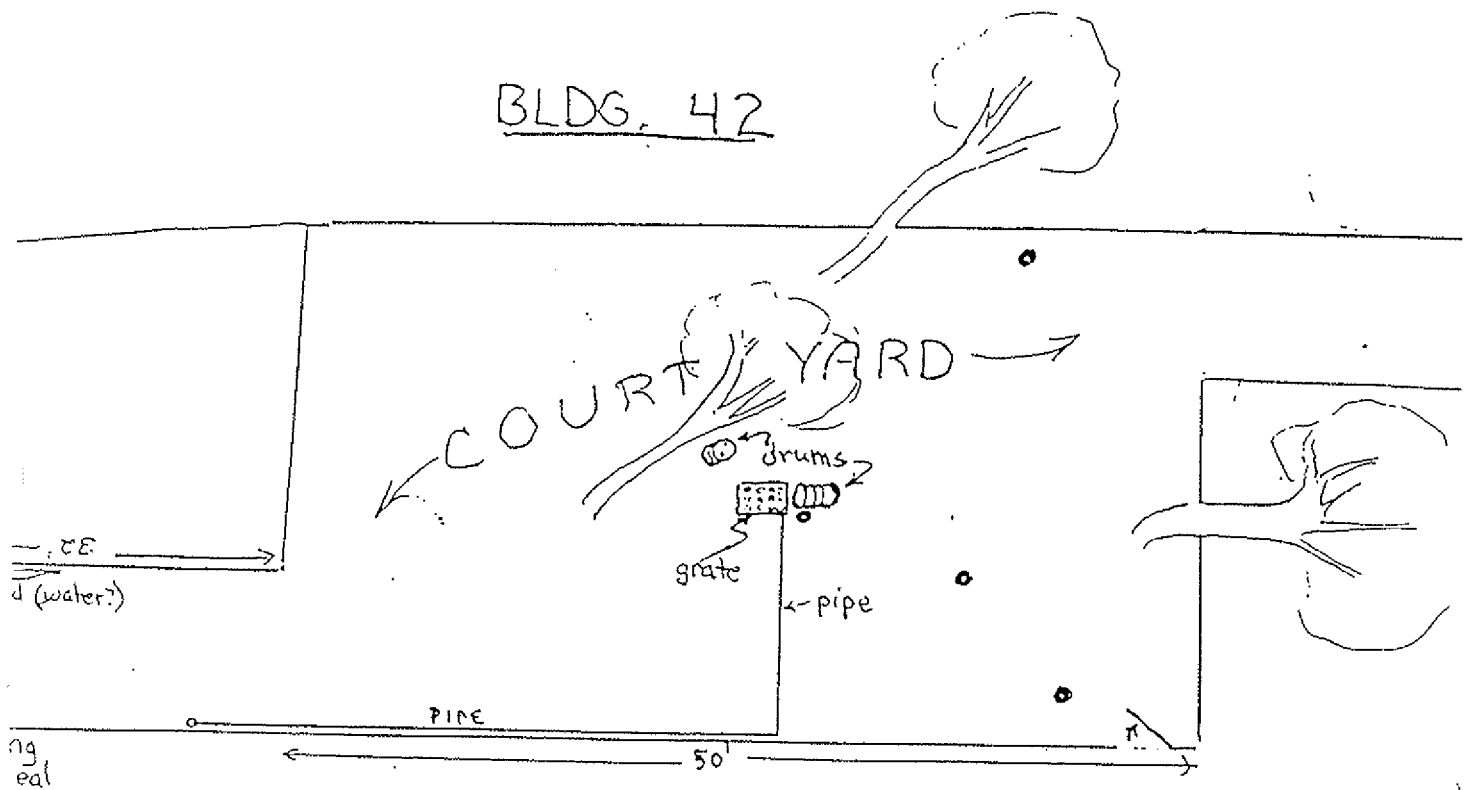


DDC000303

TIERRA-B-006825

PATHMARK SUPERMARKET



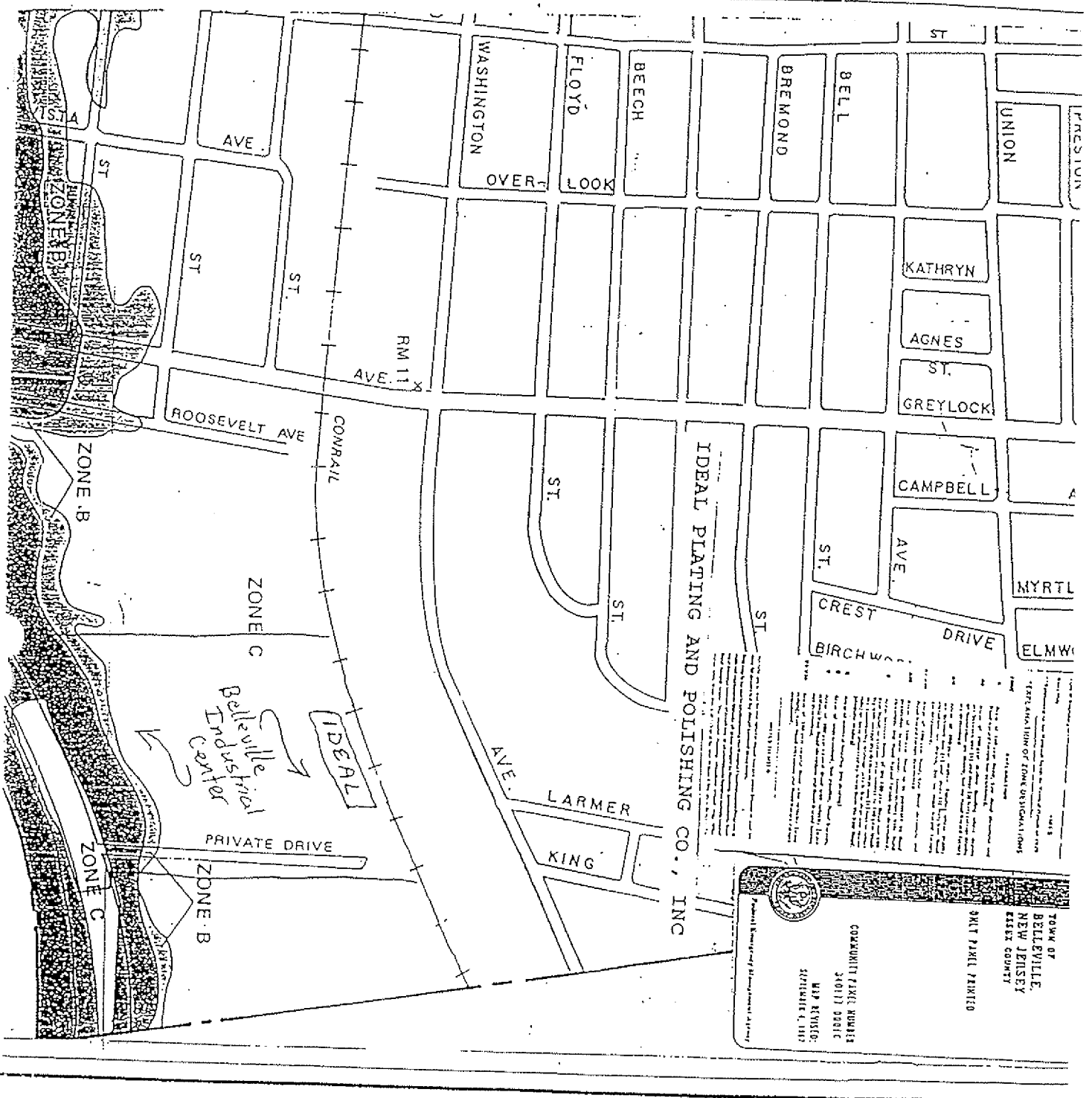


SKETCH OF THE COURTYARD AT
BLDG. 40 - IDEAL PLATING AND POLISHING
7-19-93 INSPECTION

DDC000305



DDC000306

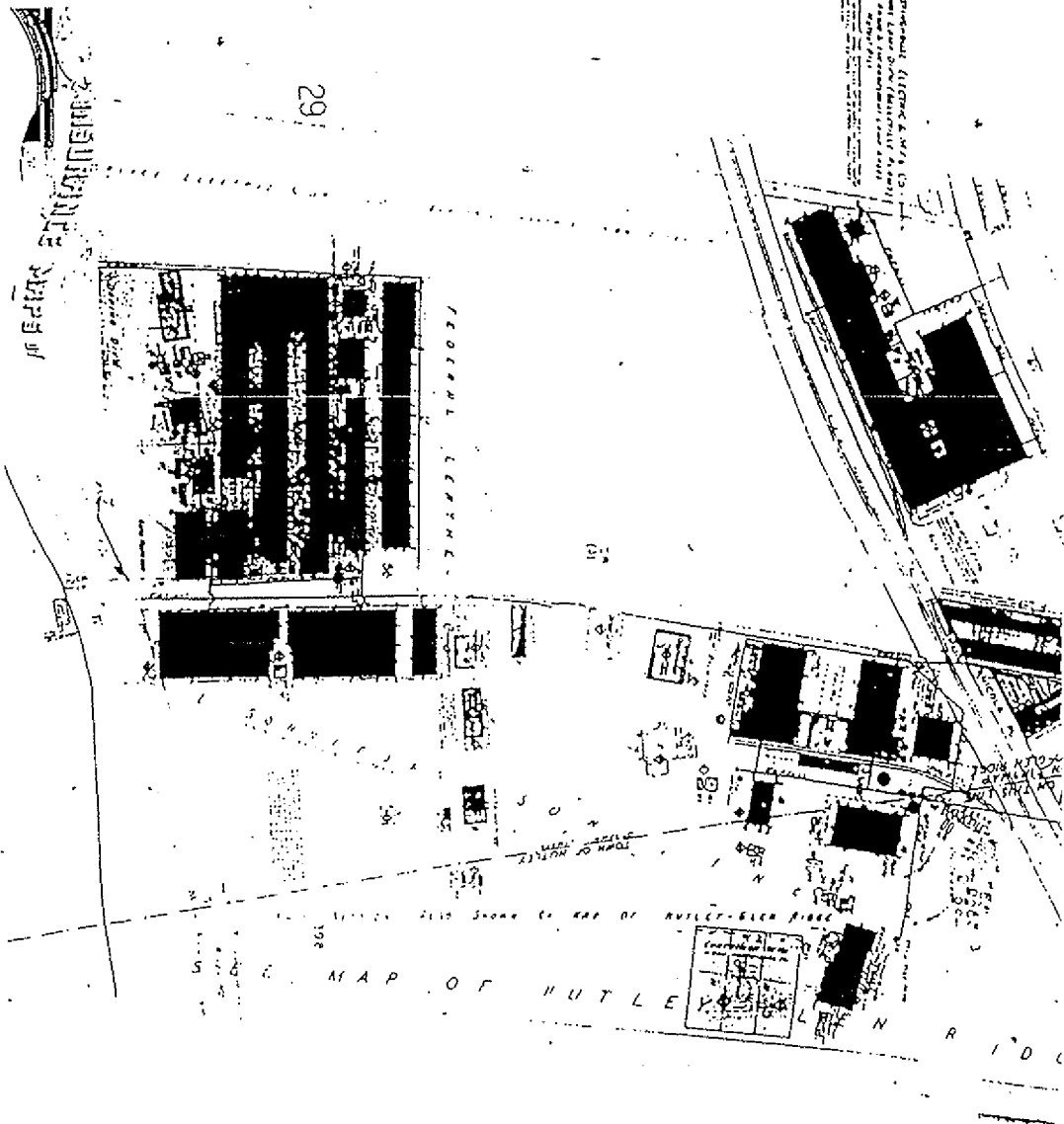


DDC0000307



NEW JERSEY

BELLEVILLE



DDC000308

Population: 30,000

Prevailing Winds:—Northwest

PAVING:—46 miles of paved streets.

GRADES:—Slightly rolling.

WATER FACILITIES

Municipally owned. Supply obtained from City of Newark. (For detailed report on facilities see Newark, N. J., Vol. 1). System divided into high and low services. Low Service supplied through two 12" connections from the City of Newark's Belleville Reservoir, elevation 186', capacity 14,000,000 gallons. High Service supplied through six 6" or 8" connections from Macopin Intake (42" reducing to 86") and the Newark 86" high service main. Section south of Newark Ave. (Silver Lake) supplied directly from City of Newark distribution system.

56 miles of 4" to 16" water pipe. 498 double and triple hydrants. Average daily consumption 2,000,000 gallons. Average pressure 60 lbs. Pressure at Belleville and Washington Aves. 84 lbs.

FIRE DEPARTMENT

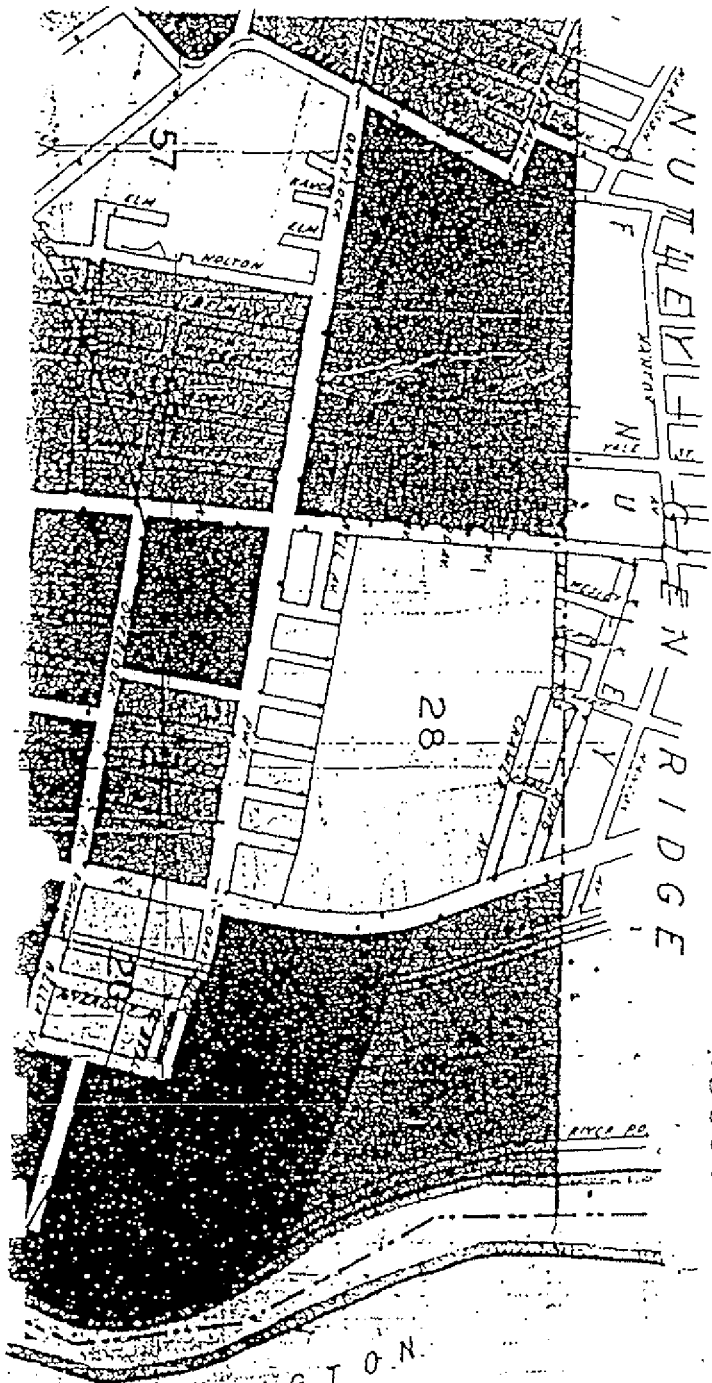
Partly paid consisting of 1 chief, 2 battalion chiefs, 2 lieutenants and 19 men. 20 volunteers. 8 stations.

1 Day-Elder service truck with 284 cu. yd. capacity. 1 Day-Elder hose wagon with one 85 gallon chemical tank, 200' hose and 1,100' 2 1/2" hose. 1 Day-Elder hose wagon with one 150 gallon booster tank, 200' hose and 1,100' 2 1/2" hose. 1 Beagrave 750 gallon per minute pump with one 80 gallon booster tank, 200' hose and 1,100' 2 1/2" hose. 1 American-Lafayette 600 gallon per minute pump with one 100 gallon booster tank, 200' hose and 1,000' 2 1/2" hose. 1 Beagrave 600 gallon per minute pump with one 100 gallon booster tank, 200' hose and 1,000' 2 1/2" hose. 8,000' 2 1/2" hose in reserve.

Gamewell fire alarm system. 69 boxes. Headquarters located at Fire Station No. 1 at 117 William St. in one-story brick addition. Alarm also by telephone.

No Fire Limit. No Fire-Resistive Roofing Ordinance.

NDC0000309



... openings in the roof and floor with wired glass.

Second stories.

Self-closing traps.

(15) Ground.

Vertical steam.

Gasol.

Electric plant.

Sprinklers.

Chemical sprinklers.

Sprinklers in part of building only.

Fire alarm.

Stand pipe.

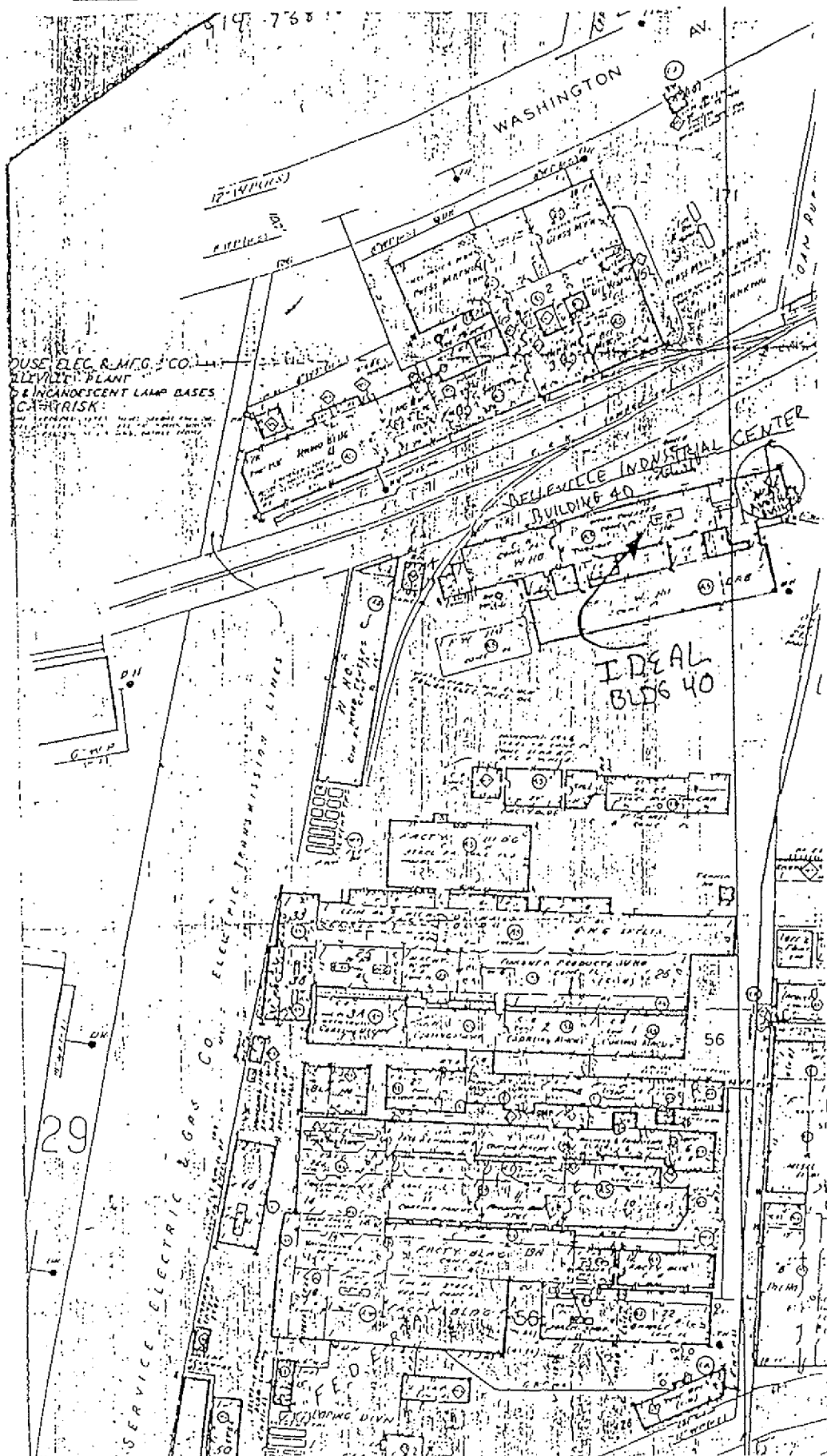
Fire engine.

Drank of the High Pressure Fire Service of the High Pressure Fire Service.

24

(36) Under page number.

Page 3108



DDC000310

PART XIV: POTENTIALLY RESPONSIBLE PARTIES

<u>NAME</u>	<u>OWNER/OPERATOR/ KNOWN DISCHARGER</u>	<u>CURRENT ADDRESS</u>
Ronald Knigge	Operator Known Discharger	681 Main Street Box 100 Belleville, NJ 07109
Lynn Clurman	Owner	681 Main Street Belleville, NJ 07109

000000311

CARMINE T. PERRAPATO
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THOMAS J. CIFELLI
VICE CHAIRMAN

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BEN W. GORDON
SEPH M. KEEGAN
RLES A. LAGOS
COMMISSIONERS

PASSAIC VALLEY SEWERAGE COMMISSION

600 WILSON AVENUE
NEWARK, N.J. 07105
(201) 344-1800

SEYMOUR A. LUBETKIN
CHIEF ENGINEER

CHARLES C. CARELLA
CHIEF COUNSEL

MRS. CHARLES T. SCHAEDEL
CLERK-TREASURER

July 27, 1977

RECEIVED

AUG 2 1977

INTERSTATE SANITATION
COMMISSION

Passaic Valley Sewerage Commissioners
600 Wilson Avenue
Newark, New Jersey 07105

Re: Bi-Monthly Report
May and June 1977

Gentlemen:

The following is my report which covers the months
of May and June 1977, and consists of three parts:

Part I: Special Reports

#1 - The Passaic River
May-June 1977 Page 1

#2 - A Potpourri of
Problems Page 8

Part II: Pollution violations
that were eliminated
during the month, toge-
ther with a report on
how elimination occurred Page 14

Part III: Pollution violations that
were still discharging at
the end of the month into
the streams under the
jurisdiction of the PVSC,
together with a report on
what is being done to
abate such pollution Page 30

DDC0000080

848660004

Violation and Elimination - Allied Textile Printers
Corp., 1 Van Houten Street, Paterson, New Jersey
May 24 - May 31, 1977 (T. Costello)

While making a routine inspection of the West Broadway overflow outlet at 11:30 A.M. on May 25, 1977, Inspector Costello observed an oily film in the Passaic River. He traced it upstream to Allied Textile, and met with Mr. Harold Mueller, Plant Engineer. Mr. Mueller explained that the plant sewage pumps failed electrically at 9:00 P.M. on May 24, and the wet well overflowed allowing sewage to run down the bank and into the river. When Mr. Mueller was contacted by plant personnel, he proceeded to the plant where he corrected the failure by 11:00 P.M., stopping the overflow. Although the violation was eliminated the oily film was visible along the bank until May 31, 1977.

Violation and Elimination - Belleville Industrial Park,
(Helion Industries), 681 Main Street, Belleville, New Jersey
April 20 - June 10, 1977 (D. DeMarco)

On April 20, 1977, while making routine checks in his district, Inspector DeMarco observed a white colored liquid flowing down a driveway at the Belleville Industrial Park, and into a storm sewer catch basin on Main Street, thence to the Passaic River. Checking further, he found that the liquid was overflowing from a manhole in front of Helion Industries.

Inspector DeMarco then met with Mr. Bernard Slater, Plant Engineer for the Industrial Park, and was informed that the manhole was over a storm sewer which was blocked. Mr. Slater was told that this was an illegal discharge since this material should not have ever been discharged into a storm sewer. Further investigation revealed that the internal building sewer line was connected to the storm sewer. Mr. Slater was directed to repipe the building sewer line to the sanitary sewer and he agreed to do this.

Inspector DeMarco then met with Mr. Vincent Esposito, Plant Manager of Helion Industries, and when he was informed of the situation Mr. Esposito stated he would not use the sewer until it was reconnected to the sanitary sewer. Although subsequent investigations showed that Helion was not polluting, this violation was carried until the sewer connection was made.

The illegal connection was confirmed on May 3, by putting dye into the floor drain and seeing it appear in the storm drain. Although Mr. Slater had promised to make the connection to the sanitary sewer in April, Mr. Lubetkin was forced to write to Mr. Ellis of the Belleville Industrial Center on May 19 and direct him to make the modifications promised. The material was delivered in May, and a sump with a pump was installed to pump the industrial waste to the sanitary sewer via 20 feet of 14" pipe. The storm sewer connection was sealed as of June 10, 1977.

DDC000081

848660005

May 7th, 1926.

Report to J. R. Van Duyne, Chief Engineer.

FEDERAL LEATHER COMPANY, Nutley, N.J.
Owners of Nutley Laundry.

Mr. Plansoen reports that the Town of Belleville at first agreed to pay cost of sewer, to take care of his plant, but later stated that no funds were available. However he is going to build the sewer at his own expense. He will start digging next week.

This firm is still polluting the River.

Joseph J. Murray.
Div. Eng.

STREAM CONTAMINATION REPORT

District No. 6 Date: 4/20/77 Time: _____
Weather: Clear
Company Name: BELLEVILLE INDUSTRIAL CENTER
Address: 681 Main St., Belleville, N.J.
Name & Title of Person Contacted: Mr. Abram Ellis, Pres.
Telephone: 751-0300
Nature of Business: Industrial complex
No. of Outlets: (1) One to Passaic River
Method of Waste Disposal: Sanitary Sewer X Combined Sewer _____
Storm Sewer, River or Ditch _____
If NPDES Permit is Required: Draft Permit: _____ Final Permit: _____
Violation: Waste water into storm sewer to Passaic River
1. Color _____
2. Odor _____
3. Turbidity _____
4. Estimated Flow (G.P.M.) _____
5. Collection on Banks _____
6. Surface Scum, Foam or Oil _____
7. Approximate Distance Extending into Stream or River; Width Upstream of
Downstream _____
8. pH Reaction with Test Paper _____ Sample Taken Yes
9. Why Sample Not Taken _____

(Complete narrative on reverse side)

DDC000082

848660006

While making a routine inspection I noticed large puddles of water coming down the driveway from the Industrial Center and going into the catch basin on Main St., Belleville, N.J.. My investigation revealed that the storm sewer was blocked up and the water was coming out of a catch basin in front of Bldg. 11 of the Industrial Complex, this water had a white cast to it. I contacted Mr. Sernie Slater, plant Engineer and he informed me that there must be a blockage into the storm sewer and that he would have this un-blocked as soon as possible. I questioned him about the discoloration in the water, (white) and he informed me that there is a possibility that Bldg. 11, occupied by the Helion Industries Inc. was discharging their tank washing into a catch basin in the plant that empties out into the storm sewer that leads out into the Passaic River. He told me that he would have this catch basin in the plant connected to the nearby sanitary sewer. He promised me that this will be done by Tues. 4/26/77. That afternoon the blockage of debris was removed from the catch basin and there was no overflow onto the street.

I will continue to see if this discharge is running only clean water.

D. M. O. M. M.
Don M. Marco
River Inspector

DDC0000083

848660007

PASSAIC VALLEY SEWERAGE COMMISSIONERS
DEPARTMENT OF SANITATION CONTROL

F. Cupo

LABORATORY REPORT

HELVON

STANDARD METHODS OF ANALYSIS

INDUSTRIES

RESULTS EXPRESSED IN MILLIGRAMS PER LITER (mg/l)

DATE OF SAMPLE 4/21/77 TIME 1:45p.m. SAMPLE No. D-268

SAMPLE OF Belleville Industrial Center - 681 Main St. Belleville Overflow

of Storm Sewer Catch Basin into Storm. TAKEN BY D. DeMarco/L. Cuccinelli
Sewer on Main St. Empties into Passaic River.

TOTAL SOLIDS		TURBIDITY (J.T.U.)	
TOTAL VOLATILE		pH	215 mlf
TOTAL MINERAL		FLAMMABLE	8.1 eb
SUSPENDED SOLIDS	123 jm	EXPLOSIMETER (PERCENT)	
SUSPENDED VOLATILE	47 jm	ORTHOPHOSPHATE (DISSOLVED)	
SUSPENDED MINERAL	76 jm	TOTAL PHOSPHATES	
DISSOLVED SOLIDS		TEMPERATURE °F	70
SETTLEABLE SOLIDS (ml/L)		COLIFORMS PER ml	
TOTAL NITROGEN		FECAL COLIFORMS PER 100 ml	
AMMONIA NITROGEN		THRESHOLD ODOR NUMBER	
ORGANIC NITROGEN		GREASE AND OIL	
NITRATE NITROGEN		TOTAL ORGANIC CARBON	110 eb
NITRITE NITROGEN			
CHLORIDES AS CHLORINE	10 mlf		
ALKALINITY AS CaCO ₃			
CHEMICAL OXYGEN DEMAND	341 mlf		
BIOCHEMICAL OXYGEN DEMAND			
CHLORINE DEMAND			
CHLORINE RESIDUAL			

DESCRIPTION:

Cloudy Gray Turbid Liquid
Gray Suspended Matter
Gray Sediment
No Odor

REMARKS:

Reg

DDC000084

Alexander S. Goldberg
ALEXANDER S. GOLDBERG
DIRECTOR OF SANITATION CONTROL

848660008

STREAM CONTAMINATION REPORT

District No. 6 Date: 4/28/77 Time: 1:30 P.M.
Weather: Clear
Company Name: BRIDGEMAN INDUSTRIAL CENTER
Address: 681 Main St., Holleville, N.J.
Name & Title of Person Contacted: M. Bernie Slater, Plant Engineer
Telephone: 751-0300
Nature of Business: Industrial Pollution
No. of Outlets: _____
Method of Waste Disposal: Sanitary Sewer _____ Combined Sewer _____
Storm Sewer, River or Ditch _____
If NPDES Permit is Required: Draft Permit: _____ Final Permit: _____
Violation: Waste water into storm sewer to Passaic River
1. Color _____
2. Odor _____
3. Turbidity _____
4. Estimated Flow (G.P.M.) _____
5. Collection on Banks _____
6. Surface Scum, Foam or Oil _____
7. Approximate Distance Extending into Stream or River; Width Upstream of
Downstream _____
8. pH Reaction with Test Paper _____ Sample Taken _____
9. Why Sample Not Taken _____

(Complete narrative on reverse side)

DDC000085

848660009

Spoke to Mr. Slater, Plant Engineer, and he informed me that he expects to have a plumber in this week, Friday 4/29/77 to route out the storm sewer line to make sure that it doesn't block up. Also he told me that he would have the catch basin at the Halion Industries Inc., Bldg. 11, which occasionally, once or twice a week, discharges their waste water from their tumbling machine into the catch basin that empties out into the storm sewer disconnected, and place the pipe to the sanitary sewer which is a short distance away. This he expects to have completed by the end of next week. I also told him to check if the complex has a permit for constant discharge from this complex into the storm sewer which empties out into the Passaic River at Main St.

Will sample the storm sewer next week, have to make arrangements to lift up the heavy catch basin in the driveway of this complex.

Don De Marco
Don De Marco
River Inspector

DDC000086

848660010

STREAM CONTAMINATION REPORT

6

5/3/77

10:30 A.M.

District No. _____ Date: Clear Time: _____
 Weather: _____
 Company Name: BELLEVILLE INDUSTRIAL CENTER (HELION IND)
 Address: 681 Main St., Belleville, N.J.
 Name & Title of Person Contacted: Mr. Bernie Slater, Plant Engineer
 Telephone: 751-0360
 Industrial Telephone: _____
 Nature of Business: _____
 No. of Outlets: _____
 Method of Waste Disposal: Sanitary Sewer _____ Combined Sewer _____
 Storm Sewer, River or Ditch _____
 If NPDES Permit is Required: Draft Permit sewer to Pass Final Permit
 Violation: _____
 1. Color _____
 2. Odor _____
 3. Turbidity _____
 4. Estimated Flow (G.P.M.) _____
 5. Collection on Banks _____
 6. Surface Scum, Foam or Oil _____
 7. Approximate Distance Extending into Stream or River; Width Upstream of
 Downstream _____
 8. pH Reaction with Test Paper _____ Sample Taken _____
 9. Why Sample Not Taken _____

(Complete narrative on reverse side)

DDC0000087

848660011

101
BELLEVILLE INDUSTRIAL CENTER

(HELION INC.)

On Tuesday 5/6/77, at approx. 10:30 A.M., myself and Ass't. Supt. Cuccinello met with Mr. Bernie Slater, Plant Engineer of the above named complex, and we proceeded to dye test the floor drain in Bldg. 11 of the Helion Industries Inc. This drain into which this company empties out its wash water, from a holding tank, goes into a catch basin and empties out into a 6 inch storm sewer line that comes out to the main storm sewer line in the driveway and this empties out into the Passaic River.

Mr. Slater said that he would have to get a plumbing contractor in this coming week, and have this drain rerouted to the sanitary sewer.

DDC

14 15

Dom De Marco
Dom De Marco
River Inspector

1518

1518

DDC0000088

848660012

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CHARLES A. LAGOS
COMMISSIONERS

PASSAIC VALLEY SEWERAGE COMMISSIONERS

600 WILSON AVENUE
NEWARK, N.J. 07105
(201) 344-1800

SEYMOUR A. LUBETKIN
CHIEF ENGINEER

CHARLES C. CARELLA
CHIEF COUNSEL

MRS. CHARLES T. SCHAEDEL
CLERK-TREASURER

May 19, 1977

Mr. Abe Ellis
Belleville Industrial Center
681 Main Street
Belleville, New Jersey 07109

Dear Mr. Ellis:

This will confirm Passaic Valley Sewerage Commissioners' inspector's report to you, that the discharge from the Belleville Industrial Center, taken on April 20, 1977, which entered into the storm sewer catch basin and, then, into the Passaic River was polluting. The investigation revealed that the polluting material emanated from Helion Industries, Inc., within your complex. This is to inform you that this material must be diverted from the storm sewer to halt the pollution. I am also enclosing herewith, a copy of a letter sent to Helion Industries together with a copy of a letter of theirs, dated May 11, 1977, which is self-explanatory. The PVSC does not want to get involved with an internal problem concerning the cost of relocating such sewer. However, it is absolutely essential that the pollution be halted at once, and, as the owner of the property, you are hereby directed to make any modifications required to halt this pollution.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

S. A. Lubetkin,
Chief Engineer

SAL/lpg

CERTIFIED MAIL

cc: C. C. Carella, Esq.
Helion Industries, Inc.
Mr. F. D'Ascensio

DDC000091

848660015

WATER CONTAMINATION REPORT

District No. 6 Date: 5/20/77 Time: 11:00 A.M.
Weather: Clear
Company Name: BELLEVILLE INDUSTRIAL CENTER (HELION IND.)
Address: 681 Main St., Belleville, N.J.
Name & Title of Person Contacted: Mr. Bernie Slater, Plant Engineer
Telephone: 751-0360
Nature of Business: Industrial Complex
No. of Outlets:
Method of Waste Disposal: Sanitary Sewer X Combined Sewer
Storm Sewer, River or Ditch
If NPDES Permit is Required: Draft Permit: Final Permit:
Violation: Waste water into storm sewer to Passaic River

1. Color
2. Odor
3. Turbidity
4. Estimated Flow (G.P.M.)
5. Collection on Banks
6. Surface Scum, Foam or Oil
7. Approximate Distance Extending into Stream or River; Width Upstream of
Downstream
8. pH Reaction with Test Paper Sample Taken
9. Why Sample Not Taken

(Complete narrative on reverse side)

DDC000092

848660016

On 5/20/77-spoke to Mr. Bernie Slater, Plant Engineer of this Complex, and he informed me that he ordered a sump pump and pipe to be installed at the Helion Indus. Inc. Building #11. He expected to start work to eliminate the pollution this coming week.

Dom De Marco
River Inspector

DDC000093

848660017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

FEB 14 2006

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

Lynn Clurman, President
Belleville Industrial Center
681 Main St.
Building 43
Belleville, NJ 07109

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

Dear Mr. Clurman:

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

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

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

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

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

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were released from the former Helion Industries, Inc. operations located at 681 Main Street in Belleville, New Jersey, into the Lower Passaic River Study Area. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, the Belleville Industrial Center may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely yours,



Ray Basso, Strategic Integration Manager
Emergency and Remedial Response Division

Enclosure



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**

James P. Blake
Vice President and General Counsel
The BOC Group, Inc.
575 Mountain Avenue
Murray Hill, NJ 07974

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

Dear Mr. Blake:

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 The BOC Group, Inc. of its potential liability relating to the Site pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Under CERCLA, potentially responsible parties ("PRPs") include current and past owners and operators of a facility, as well as persons who arranged for the disposal or treatment of hazardous substances at the Site, or the transport of hazardous substances to the Site.

In recognition of our complementary roles, EPA has formed a partnership with USACE and the New Jersey Department of Transportation-Office of Maritime Resources ("OMR") ["the governmental partnership"] to identify and 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 Air Reduction Company facility located at 681 Main Street in Belleville, New Jersey, into the Lower Passaic River Study Area. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, The BOC Group, Inc. as successor to the Air Reduction Company, Inc., 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.

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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

Enclosure 6-06