

CWC INDUSTRIES, INC.  
MFRS. OF HOT STAMPING FOILS SINCE 1969

185 FOUNDRY ST.  
NEWARK, N.J. 07105

TELEPHONE (201) 344-1434  
FAX (201) 589-1617

MAY 30 1996

May 28, 1996

RECEIVED

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

Dear Mr. Richman:

In response to your recent "Request for Information" concerning discharges into the Passaic River, the following are our answers to the questions:

1) The address at 185 Foundry St. is the site of an industrial complex with at least ten to fifteen different buildings. I believe that most of the property on which the buildings are located on are owned by Norpak Corporation, which is located on 70 Blanchard St., Newark, NJ 07105.

Our first location of rental started in 1969 in building #36. Following this was our additional occupancy at building #18 in 1976, followed by building #17 in 1981. These three are denoted site location "A." See Figure 1. I believe that if searched into older records, other buildings existed within this complex but were torn down. In 1990, we moved out of these three buildings into buildings #39 and #39A where we are still currently situated. These buildings were not owned by Norpak Corporation. This location is denoted location "B." See Figure 1.

During the years 1969 to 1990, many other chemical companies occupied other buildings as well as the periods when we were not in these buildings. In addition to manufacturing, some distributed chemicals (such as regenerated or recovered chemical solvents). See Figure 2. Throughout our occupancy, there were also many buildings which were abandoned or not leased. By the middle to late 1980's, in addition to us, I believe that only buildings #1, #14, #21, and #29 were occupied. There were also other companies occupying land at 185 Foundry St. but not the buildings during these years. For example, there were drum cleaning operations in outside open space. Some of the space was used for trucks and their cargo of solvents.

The complex was easily accessible because it was opened and not fenced in. Because the industrial complex was deserted when nobody was working and because it was unlighted or poorly lighted at best at night, there was rampant dumping and vandalism. Along with household and industrial items, ..

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there was presumably dumping of hazardous materials by the drum and disposal by simple pouring. Dumping should be well documented by local authorities and the NJ Department of Environmental Protection. Dumping into the sewage has been caught and recorded by the Passaic Sewage Commission. The Newark Fire Department should have recorded reports of fires or smoke in some of these abandoned buildings where people were processing illegally. In many instances, we could also smell some unidentifiable foul odors.

2a) Our paperwork of the one time disposal was in 1990 with the location A. The EPA id number was NJD118868976. There were no other incidents of hazardous waste disposal in locations A or B.

We currently do not have hazardous waste. All paint from a leftover batch are blended with other leftover batches to make a third batch. The one time disposal occurred because apparently there was some contamination in the product which we decided not to reprocess. It was certainly possible to reprocess those drums, but we decided not to. Therefore, these drums were always "in process," but we decided to remove them.

2b) No

3) Yes. We have received and utilized toluene, methyl ethyl ketone, and methanol. We have also received v m & p naphtha, but it is different from naphthalene. Napthalene is an aromatic hydrocarbon while the former is aliphatic. None other from the list applies. We did not manufacture them, nor did we ever discharge or release them. We had a one time disposal. See 2a.

4a and b) The chemicals listed above and other hazardous substances were purchased and used, but not generated, produced, or manufactured.

5a) The one time disposal was arranged and managed by Peter Chan and I.

5b) The one time disposal was taken to S & W Waste, 105 Jacobus Av., South Kearny, New Jersey 07032.

5c) In each location A and B, the largest container used for storage is the 55 gallon drum. To transfer material from the 55 gallon drum to a smaller container, we employed pouring, scooping or pumping.

5d) See Figure 1 for storage locations in location A. and B. In location A, hazardous substances were stored in our outside storage area of building #18. In location B, hazardous substances are stored in our storage room. The floor areas of both storage locations are in tact.

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5e) I'm not familiar with a "containment dike." We did not change the pavement so as to contain spills.

5f) No

5g) No hazardous waste existed in locations A or B. See above for the one time disposal.

6a) No process waste waters in locations A or B were generated.

6b,c) I am not familiar with the terms "disposal drain," "sanitary sewer," "catch basin," and "lagoon." We are alarmed at the finding that there were high levels of volatile organic substances found in the drain in an EPA 1990 sample. HOWEVER, FROM OUR OPERATIONS, CATEGORICALLY NO SPILL OR PROCESS EFFLUENTS, EITHER DONE INTENTIONALLY OR NON-INTENTIONALLY, OF ANY HAZARDOUS MATERIAL WENT INTO ANY HOLE IN ANY GROUND.

7a) None were generated.

7b) I'm not familiar with what connects to the Passaic River, but in our operations at locations A or B, there has never been any discharge of these substances into the ground or drain.

8) None of these incidents have occurred.

9a) Yes. I'm not sure from what overflow, but there were times when the much of the complex in location A was flooded. Building #36 was never flooded, but #18 (once or twice, but not entirely), the outside storage area, and some of building #17 were. See figure 3 for a great extent of flood diagram for location A. During the floods, there was never a discharge of our hazardous material. During the floods, there was never an incident when any 55 gallon drum or smaller drum overturned to spill hazardous materials as a result of floatation in the water. From figure 3, smaller cans were located in a storage hut. Within the storage hut, there were 3 or 4 levels of skids elevating the smaller cans above flood level. In addition, these smaller cans were also stacked such that the weight of the stacking prevented overturning in flooding. There was never an incident when the flood level exceeded the height or level of a container such that water would get into the container.

An careful analysis of the buildings around the complex should reveal similar chemical content around the bottom first 12 inches of the buildings in the flood area. This indicates that during flooding, water circulated and carried the chemicals throughout the entire complex. There were also instances during flooding when chemicals seem to be floating on the water. Location B has never been flooded.

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CH 30, Jan, 1930 09325

Form Approved. OMB No. 2050-0039. Expires 9-30-8

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	E. Generator's USE ONLY 1001108680763999	Manifest Date 10/09/99	P. Page 1 of 1	Information to the shaded areas is not required by Federal law.
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UNIFORM HAZARDOUS WASTE MANIFEST		Generator's Identification		Manifest Identification		Page 1 of 1		Information to the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>C&amp;W INDUSTRIES</b> <b>185 Foundry Street, Bldg #18</b> <b>Newark, NJ 07105</b>				6. US EPA ID Number <b>JD991291105</b>		A. State Manifest Document Number <b>NJA 0788989</b>			
4. Generator's Phone (201) 344-2434				8. US EPA ID Number		B. State Generator's ID <b>Same</b>			
5. Transporter 1 Company Name <b>S&amp;W WASTE, INC.</b>				9. US EPA ID Number		C. State Trans. ID <b>NJSHA-5-3002</b>			
7. Transporter 2 Company Name				10. US EPA ID Number		D. Transporter's Phone (201) 344-4004			
9. Designated Facility Name and Site Address <b>S &amp; W WASTE, INC.</b> <b>105 Jacobus Avenue</b> <b>South Kearny, N.J. 07032</b>				11. US EPA ID Number		E. State Trans. ID			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and HM Number) <b>FLAMMABLE LIQUID, NOS</b> <b>80 (DC01)</b> <b>Flammable Liquid</b> <b>UN1993</b>				12. Container No. Type <b>XX80MXX440G</b>		13. Total Quantity <b>0001</b>		14. Unit Wt/Vol <b>0001</b>	
15. Additional Description <b>VMP Naptha 25%, Isopropyl Alcohol 25%</b> <b>Methyl Ethyl Keytone &lt;10%</b> <b>Acetone &lt;10%, Water &lt;2%, Solvents &lt;0.5%</b> <b>Chlorinated Rubber &lt;1% LIQUID</b>				16. Handling Codes for Wastes Listed Above <b>15</b> <b>TC</b>		17. State of Origin <b>04</b>		18. State of Destination <b>04</b>	
19. Generator's Certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have selected the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of transportation, storage, or disposal which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I certify that I have selected the most appropriate waste management method that is available to me.				20. Generator's Signature <b>[Signature]</b>		21. Date <b>04/06/96</b>		22. Printed/Typed Name <b>JOHN G. HOGGB</b>	
23. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>JOHN G. HOGGB</b>				24. Signature <b>[Signature]</b>		25. Date <b>04/06/96</b>		26. Printed/Typed Name <b>JOHN G. HOGGB</b>	
27. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				28. Signature		29. Date		30. Printed/Typed Name	
31. Discrepancy Indication Space				32. Facility Owner or Operator <b>RECEIVED-PENDING-MANIFEST REVIEW &amp; QUALITY-CONTROL</b> <b>Carol Lynn Buckner</b>		33. Signature <b>[Signature]</b>		34. Date <b>04/06/96</b>	

cases of an emergency or spill immediately call the state fire emergency and the N.J. Dept. of Environmental Protection. (609) 292-5566 (day) (609) 292-7772 (night)

----- TSD MAIL TO - GENERATOR

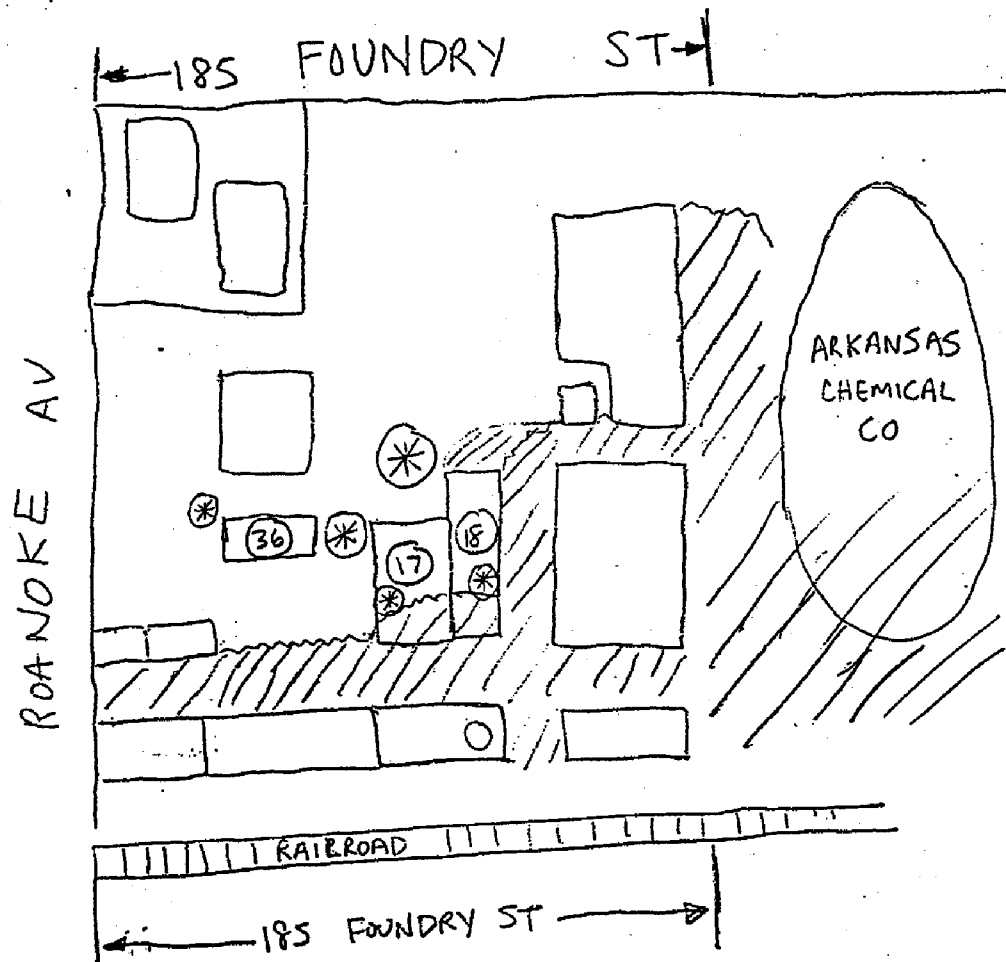
SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

- b) Dates unknown, but there was probably flooding as much as two to three times per year in location A.
- 10) None
- 11) See attached
- 12a) See the items referring to the New Jersey Environmental Responsibility Cleanup Act in question 14.
- 12b) See question 14
- 13a) Location A -no. Location B-yes.
- 13b) Location A- Norpak Corp.
- 13c) For location A, Appendix A (copy of our submittals to ECRA, dated in 1990) shows these companies. In location B, or buildings #39 and 39A, Hummel Lanolin operated prior to us.
- 14) See attached Negative Declaration.
- 15a) CWC Industries, Inc.
- 15b) Peter Chan (president) at 185 Foundry St., Newark, NJ 07105
- 15c) New Jersey
- 15d) Not available
- 15e) We also use Custom Foils Company. This name is used for selling our products.
- 15f and g) None
- 15h) CWC Industries, Inc. was incorporated in 1969.
- 15i) This company has always been owned in majority by the Chan family.
- 16) Name: Baldwin Chan  
Address: 185 Foundry St., Newark, NJ 07105  
Telephone: 201-344-1434  
Title and occupation: Chemist

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FIGURE 3: Flooded areas. This represents areas of ground...

☒ - FLOODED AREAS FROM PERSPECTIVE OF PERSON STANDING AT (\*)  
(\*) indicates locations to which I have walked and observed the flooding.



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Thank you for your kind and careful consideration. If you have any further questions or need further assistance, please do not hesitate to contact me.

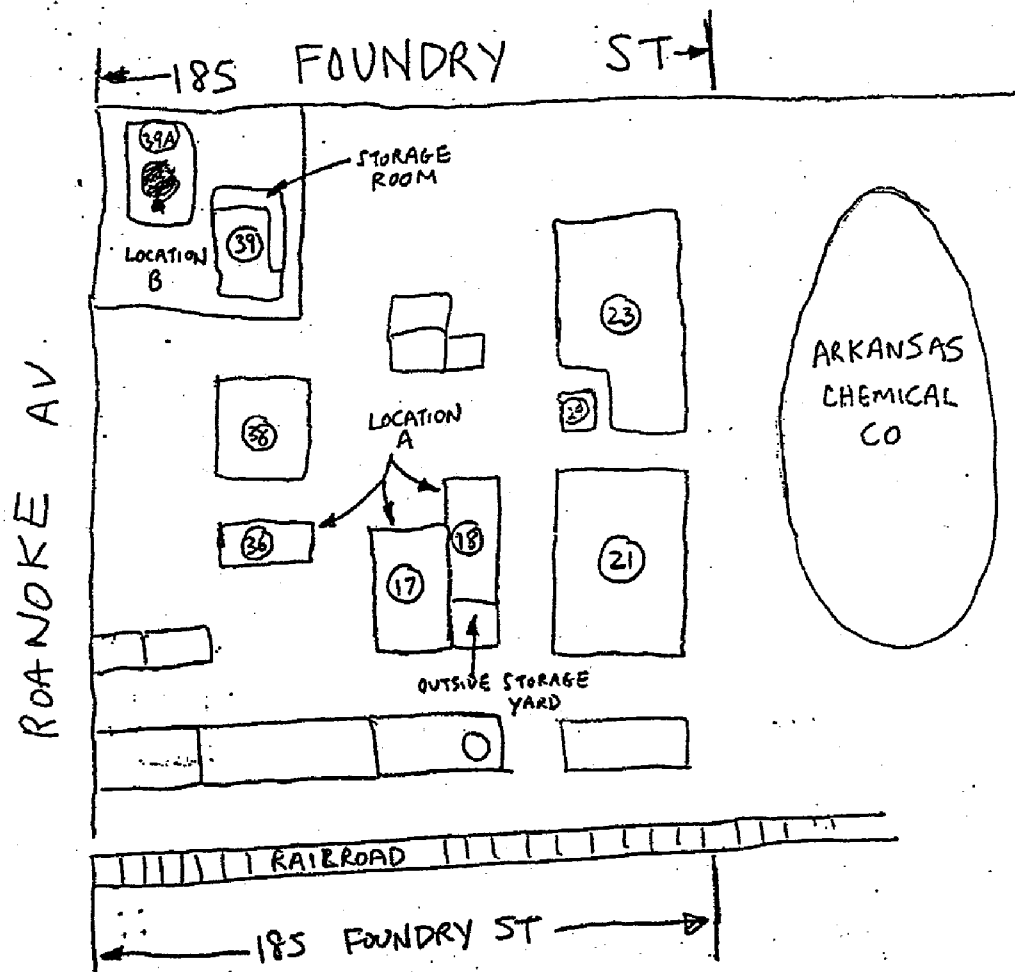
Sincerely,



Baldwin Chan  
Chemist

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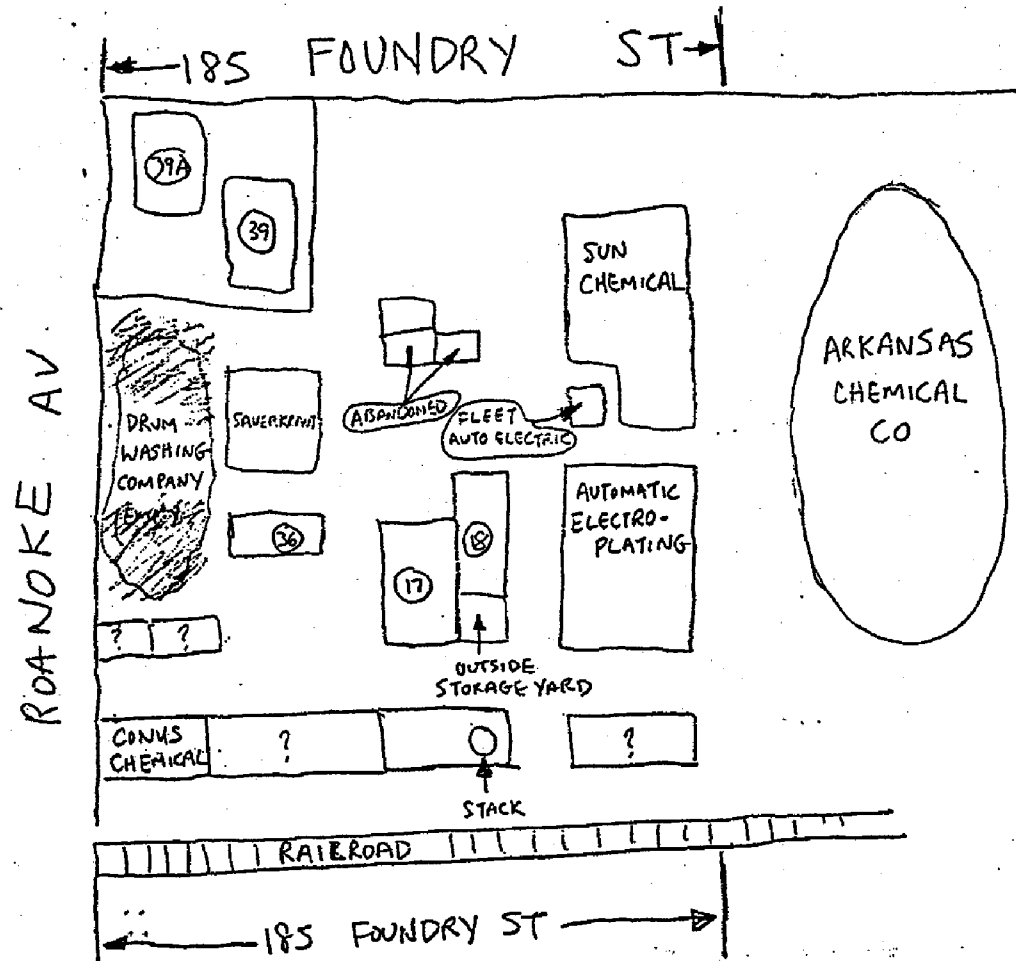
FIGURE 1: General sketch of 185 Foundry St. Not drawn proportionally correct, nor drawn to scale; I'm not sure if Arkansas Chemical Co is part of 185 Foundry St or not.



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FIGURE 2: Companies around 185 Foundry St. during our years of operation



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Appendix A

CWC Industries, Inc., a New Jersey Corporation  
ECRA-2 Site Evaluation Submission

Operational and Ownership History

<u>Name</u>	<u>Owner/ Operator</u>	<u>From</u>	<u>To</u>	<u>Current Address</u>
1. Chemical Industries, Inc.	Owner	1/30/39	5/17/62	Unknown
2. KEM Realty Co.	Owner	5/17/62	10/8/76	70 Blanchard St. Newark, NJ 07105
3. Jorco Investing Corp.	Owner	10/8/76	11/30/76	70 Blanchard St. Newark, NJ 07105
4. Norpak Corp.	Owner	11/30/76	Present	70 Blanchard St. Newark, NJ 07105
5. CWC Industries, Inc.	Operator	bldg. 36 1969 bldg. 18 1976 bldg. 17 1981	1990 1990 1990	185 Foundry St. Newark, NJ 07105
6. RDS	Operator	bldg. 17 Unknown	1972	Unknown
7. LaBar	Operator	bldg. 17 1972	1975	Unknown
8. National Gasohol	Operator	bldg. 17 Unknown	Unknown	Unknown
9. Essex Chemical	Operator	bldg. 17 Unknown	1981	Unknown
10. King Aromatic	Operator	bldg. 18 1972	1975	Unknown

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000001-04720 FROM PSI DRY 01-08-80

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Appendix A (continued)

In regard to building 36, neither Norpak Corporation ("Norpak"), the current property owner nor CWC Industries, Inc. ("CWC"), the former tenant, has information concerning past operations.

In regard to building 17: RDS was engaged in furnishing services; LaBar was engaged in furnishing trucking services; National Gasohl was engaged in the manufacturing of alcohol based fuel; Essex Chemical was engaged in the warehousing and wholesale distribution of chemicals.

In regard to building 18: King Aromatic was engaged in the manufacturing of fragrances; metal plating operations were conducted at the premises prior to occupancy by King Aromatic.

This information was provided by Norpak and supplemented by CWC.

In order to complete the required due diligence investigation of prior operators and operations conducted at the premises, CWC contacted the Newark Fire Department, the Newark Tax Assessors Office and the Newark Health Department for information regarding prior operations at the premises. The municipal agencies had no information regarding prior operations at the premises.

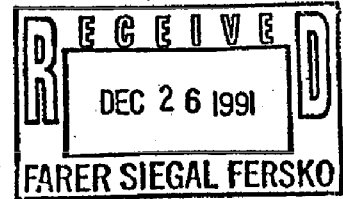


State of New Jersey  
Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation

CN 028  
Trenton, NJ 08625-0028  
Tel. # 609-633-1408  
Fax. # 609-633-1454

Scott A. Weiner  
Commissioner

Karl J. Delaney  
Director



David B. Farer  
Farer, Siegal, Fersko  
600 South Avenue West  
Westfield, NJ 07091

DEC 23 1991

RE: Industrial Establishment: CWC Industries, Inc.  
Location: 90-126 Roanoke Ave., Buildings 17, 18, and 36  
Newark City, Essex County  
Block: 5005 Lot: 4 (Leasehold Portion)  
ECRA Case #90598  
Transaction: Cessation of Operations  
Negative Declaration by operator dated November 7, 1991

Dear Mr. Farer:

Pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection and Energy (NJDEPE) by the Environmental Cleanup Responsibility Act (ECRA), (N.J.S.A. 13:1K-6 et seq.) and duly delegated to the Assistant Director of the Industrial Site Evaluation Element pursuant to N.J.S.A. 13:1B-4, the referenced Negative Declaration is hereby approved. This approval is based upon information provided in your Initial Notice as well as NJDEPE investigation of the site.

Please be advised that this Negative Declaration approval is for the leasehold portion of the above referenced facility only. It does not include the areas of environmental concern being addressed under ECRA Case #90624, #90271 and #90289 at the above referenced property.

Additionally, this approval does not include the drum storage area inside the former CWC Industries, Inc.'s leasehold portion of building #17, which is not associated with the operations of CWC Industries, Inc., and is currently a part of the EPA-Approved Drum Removal Program being implemented on the adjacent tenants leasehold located at the above referenced property.

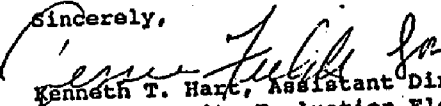
It is recognized that limited quantities of hazardous substances, specifically 100 linear feet of asbestos containing material (ACM), will remain on the property. The ACM as specified in your Initial Notice, considered complete by this office on 12/13/90, is acceptable under the provisions of ECRA.

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Recycled Paper

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This approval shall be limited to the above referenced transaction only and shall not restrict or prohibit the NJDEPE or any other agency from taking regulatory action under any other statute, rule or regulation. By issuing this Negative Declaration, NJDEPE continues to reserve all rights to pursue any penalties allowable under the law for violations of the ECRA statute or regulations associated with this transaction.

Sincerely,

  
Kenneth T. Hart, Assistant Director  
Industrial Site Evaluation Element

c: Dr. Adewale Troutman, Newark Division of Health  
Norpak Corporation, Property Owner  
Peter Chan, CWC Industries, Inc.

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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-dinitrosalicylic 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 exists 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.

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