NEW J. SEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES

INVESTIGATION MEMORANDUM

Persons Conducting Investigation Theo Ashie

Complaint No./~~NJPDES No~~ 50-079C

Date of Investigation 9-17-9C

Routing DW

Location of Incident CENTRAL STEEL Drum Compan
704 Doremus Avenue, NEWARK

Purpose of Investigation To investigate the discharge of pollutants to the surface waters of the State.

Persons Interviewed Neil Fischer, Secretary-Treasure
Central Steel Drum Company

Summary of Findings

The investigation revealed that there is a violation of N.J.S.A. 58:10A-1 et seq. at the facility. There was evidence of red paint spills around the incinerator area, and the spills ultimately ended up in the waters of the state. The drums used in the manufacturing process were not properly stored, and there were no retainer walls around the compressors so that there was evidence of discharge to the ground from the compressors. Also random spillage of oil and paint was seen all around the storage area. A notice of violation was issued for unpermitted discharge to the waters of the state and for poor housekeeping.

See attached; Industrial Survey
Industrial Stormwater non-file forms.

BB0000069

DWR-047
12/88

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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029
TRENTON, NEW JERSEY 08625

C # 50-07

NOTICE OF VIOLATION

DATE 9-17-90

METRO ENFORCEMENT ELEMENT
BUREAU OF REGIONAL ENFORCEMENT
TELEPHONE NO. (201) 669-3900

PCWS # _____ TYPE SUPPLY _____ NJPDES # _____ TYPE DISCH GW RCRA# _____
NAME OF FACILITY CENTRAL STEEL DRUM COMPANY
LOCATION OF FACILITY 704 DOREMUS AVE MUN. NEWARK COUNTY ESSEX
FACILITY REPRESENTATIVE AND TITLE NIEL FISCHER

You are hereby NOTIFIED that during an inspection of your facility on the above date, the following violations were noted and remedial actions are required:

DESCRIPTION OF VIOLATION/REMEDIAL ACTION: UNPERMITTED DISCHARGE TO THE SURFACE & GROUND WATERS OF THE STATE, AND POOR HOUSEKEEPING

The above noted violations are in violation of the following N.J. Statutes/Regulation, and will be recorded as part of the permanent enforcement history of your facility:

- [x] New Jersey Water Pollution Control Act (N.J.S.A. 58:10A-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Safe Drinking Water Act (N.J.S.A. 58:12A-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Water Supply Management Act (N.J.S.A. 58:1A-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Underground Storage of Hazardous Substance Act (N.J.S.A. 58:10A-21 et seq.) and appropriate Regulations.

Remedial action to correct the violations must be initiated immediately. Within five (5) calendar days of receipt of this Notice of Violation, you shall telephone the investigator issuing this notice at the above number with the corrective measures you have initiated to attain compliance. The issuance of this document serves as notice to you that the Department has determined that a violation has occurred and does not preclude the State of New Jersey or any of its agencies, from initiation of further administrative or judicial enforcement action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are subject to penalties of up to $25,000 per day.

Further enforcement action, which will require a written response, may be issued on these violation(s) and any additional violations found during the inspection.

Theo Achie
Investigator, Division of Water Resources, DEP
THEO ACHIE

Violation received by
NIEL FISHER

White - Original Canary - Bureau File Pink - Criminal Justice Goldenrod - Central File

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BB0000071

TIERRA-B-002628

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

SEP 12 1990

M E M O R A N D U M

TO: Colleen Kokas, Acting Section Chief
Bureau of State Case Management

FROM: David Paddock, Case Manager
Bureau of State Case Management

SUBJECT: Central Steel Drum
Newark, Essex County

On August 14, 1990, Paul Smith and I, both of the Division of Hazardous Waste Management, conducted a site inspection of the Central Steel Drum Site, 704 Doremus Avenue, Newark, New Jersey. The temperature was approximately 85°F and the skies were clear. We were accompanied on this site inspection by Michael Cisek of the Division of Environmental Quality who is dealing with this site in regard to air pollution issues.

We arrived at the site at approximately 11:00 a.m. and were met by Gerald Greenberg, Vice President of Central Steel Drum. Originally Mr. Greenberg was going to conduct the site inspection with us but he requested that Norman Cohen, Plant Manager, take us around instead. We had a videocamera and a 35 mm camera during this site inspection, which we used to record the site conditions and general operation.

Upon entry to the site I observed numerous drums in the temporary storage area which were not marked with the contents or accumulation dates. I informed Mr. Cohen about this situation and he stated that he would correct the problem immediately.

In the drum storage area I noticed that CSD had purchased a new piece of equipment and was operating it on a flat-bed trailer. This equipment is used to cut the tops off of the closed head drums to allow flame access in the incineration process. This equipment will remain outside until the operators work the "bugs" out of it; at that point it will be installed permanently within the cutting shed where the old equipment is now.

The drum storage area in general looks as it has on all my previous inspections, with absolutely no progress made toward remediating the numerous environmental concerns onsite. Spills of blue, green and red liquids were apparent on the ground throughout the drum storage area, but no

direct source was evident. The material seemed to seep and collect in puddles adjacent to piles of drums.

In the vicinity of the incinerator I observed an extremely large area of green liquid that appeared to be originating from the drum flipping operations. When I went to the east side of the drum flipping shed, I witnessed and photographed green liquid flowing directly from the drum flipping house.

The rolloff containers at the site were full and contained a gray/black ash. The doors on one of the rolloff containers stood open, allowing material to fall into a large puddle of liquid beneath it and eventually flow off of the site.

The sludge burner portion of the incineration process was shut down during this site inspection, therefore not allowing the full treatment of drum residue to occur. Conversations with Mr. Cisek of DEQ showed that the sludge burner had been shut down for a minimum of six weeks. Mr. Cisek also observed the continued release of fugitive emissions from CSD's incinerator stack along with the release of large amounts of fly ash from the incinerator itself. Mr. Cisek will handle these violations through a DEQ enforcement action. In addition to all of the above, Mr. Cisek and I observed a flash fire on the incinerator line, fueled by the drum residues. I was able to photograph this fire before it was extinguished.

At the rear of the maintenance garage on the south end of the site, Mr. Smith noted and videotaped a drainage pipe which originated from a wash sink in the garage and discharged directly onto the ground. This may have caused severe harm to the surrounding media depending on the material that was being discharged.

After the videotaping was completed, I again questioned Mr. Cohen about his status on labeling the drums in the drum storage area. He again said he would have the drums labeled immediately. Mr. Smith, Mr. Cisek and I left the site at 1:00.

sw

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

BBC0000085

MEMORANDUM

TO: Colleen Kokas, Section Chief
Bureau of State Case Management

13 MAR 1990

FROM: David Paddock, Case Manager
Bureau of State Case Management

SUBJECT: Site Inspection of Central Steel Drum
Newark, Essex County, New Jersey

Thomas Brady, a field inspector for the Division of Hazardous Waste Management, and myself arrived for a site inspection of Central Steel Drum (CSD) on February 27, 1990 at 11:30 a.m. It was 25-30° F, windy and cloudy. Upon our arrival to the Site we met with Neil Fischer, Production Manager for CSD, who proceeded to give us a tour of the Site and a general explanation of the operation. Mr. Fischer began the tour at the area where workers unload drums from incoming trailers. Tom and myself observed this operation for a short time and noticed that none of the workers unloading the drums checked to see if the drums were "empty". The term "empty" is defined as having one inch (1") of material or less remaining in the drum. When I questioned Mr. Fischer about how his workers check to ensure that the drums are "empty", he told me that they can tell by weight. This is not a sufficient method to guarantee that these drums are "empty". Mr. Fischer also gave me a form that he requests the drum suppliers to sign, asserting that the drum are "empty". Although this form may give CSD some assurance that the drums are "empty", it is CSD's ultimate responsibility to ensure that these drums are "empty". At the time of my site inspection CSD was not fulfilling that responsibility.

After the workers unload the drums from the trucks, they place them in a storage area if there are no orders for that type of drum, or if they have orders for that type of drum they place the drums on a chain conveyor to get processed and run through a drum incinerator. The processing includes taking the tops off the drums and removing any sharp edges. During our observation of this process we continually checked the drums to see if they were empty. Although throughout the entire site inspection we checked over 100 drums and found none to be full, it would be very difficult to check all the drums at the site because there are approximately 60,000 drums located here, with CSD processing 3,000 per day.

After the drums are processed, they are transported on a chain conveyor to the head of the drum incinerator. In the area where the chain conveyor enters the drum incinerator I noticed many areas where the soil was visibly contaminated with multi-colored liquids and puddles of frozen purple and pink liquids. There was no point source for this material, so I presumed that they were the result of continual drum spillages.

Tom and I observed the methods CSD uses to process drums through the incinerator. Based on our observations this is the worst area of the site in terms of environmental and health hazards. The chain conveyor carrying these drums leads to the beginning of the incinerator. At this point there is a worker inverting the drums onto the chain conveyor running into the incinerator, spilling material onto the floor as he does so. This spilled material runs off the concrete floor into a small collection pit or directly onto the ground on the outside of the incinerator. Tom and I observed a large pile of sludge at the point where this material was being spilled out. According to Mr. Fischer, the sludge that drops out while in the incinerator is caught by a drag chain on the conveyor and deposited at the head of the incinerator. There was a large pile of sludge here to assert his claim. While we were observing this operation I noticed that there was a young man standing in the collection pit, calf deep in the sludge, pushing the material around with a shovel. This man was wearing no protective gear, other than a pair of rubber boots, and his pants were coated with this material. Other remarkable observations were a pile of sludge, surrounded by a pink liquid, and a pile of smoldering incinerator ash that were both exposed to any precipitation, which would have caused run off onto the ground. In this area there was also a cement trough full of pink liquid that was now frozen.

The incinerator ash that is generated by the drum burning process is deposited into roll off containers located by the incinerator. When we were at the site two of these roll off's were full and a third was empty, but was not in a position where material could be deposited in it. The material in the roll off containers looked as if it was sludge and not incinerator ash. The material in these roll off containers is disposed of and sampled by City Sand & Landfill of Sumpter, Michigan. Neil Fischer supplied us with an incomplete listing of the ash sampling analysis; the analysis was only for EP Toxicity, lead, chromium and cadmium. A more complete constituent analysis is necessary to determine exactly what is in this waste, based on the fact that the range of wastes accepted at this site is very large.

After observing the drum incinerator operation Tom and I observed the remainder of their process line. The drums are brought in from the incinerator, blasted with steel shot to remove any paint or ash, reformed with automated equipment, leak tested, painted and stacked for shipping. We observed two types of wastes being generated through these processes; fly ash from the steel shot blasting and waste water from the paint process. The ash generated through the steel shot blasting is collected in individual roll off containers and sold to a steel recycler for its high iron content. Neil Fischer could not give Tom or I an explanation where the wastewater goes that is generated during the drum spraying and we did not question him any further.

After we had examined the entire drum reconditioning process Tom and I examined the remainder of the Site. Neil Fischer showed us the area where he stores the full drums that get accidentally shipped to the Site. The drums rest on a concrete pad and are supposedly retrieved by the manufacturer or facility where they originated. Mr. Fischer stated that none of the drums remain there for more than ninety (90) days, but there is no evidence to prove this (i.e. bills of lading, manifests). The drums were also not marked and dated as required under RCRA, but Mr. Fischer contends that he doesn't need to comply with this because he is storing the waste for less than ninety (90) days, and is therefore exempt from any RCRA TSD facility requirements.

Upon further inspection we found two (2) old engine mountings that were full of oil (approximately 100 gallons). Tom questioned the plant engineer, Paul Adamson, as to why that oil was there. Mr. Adamson could not tell us how long it was there or why it was there in the first place. Behind an adjacent building Tom and I found an old storage tank, partially concealed by drums. Neil Fischer didn't know how long the tank had been there or what the capacity was, but he told us that it had been used to store fuel oil.

Tom and I noticed that there was a long trench running the length of the main building covered with metal plates, with a trench running perpendicular to it, originating from within the main building. These trenches were full of a black oily substance. Mr. Fischer said that these were the drainage ditches for the buildings. These ditches discharged to a septic tank on the site, although Mr. Fischer, nor anyone else, knew how long it was there or who pumped and disposed of the contained wastes. Mr. Fischer did contend that the tank was pumped on a regular basis, but he couldn't tell us how often that was.

We continued looking around the site, without Neil Fischer escorting us. I pointed out the monitoring wells that were installed at the Site in 1984; at this time 2 of the 8 wells casings were broken and could not be sampled. During this part of the site walk I noticed oily sheens on the surfaces of puddles of rainwater, visibly contaminated soil in the drum storage area and more pools of frozen, multi-colored liquids. I also observed a concrete pad near the incinerator which CSD contests "contains the drum spillages and pumps them back into the drum incinerator". This concrete pad is not a sufficient method to contain any wastes because it is not enclosed, and I could not find the pump that CSD claimed was there. Mr. Fischer stated earlier in the site inspection that this pump was broken and even then they barely ever used it.

After we walked the site Tom asked Mr. Fischer for the manifests and incinerator ash sample analysis dating back to 1987. During Tom's check of the paperwork I was informed of some PCB removal that took place in 1988. Mr. Fischer said that J.M. Sorge, Inc. conducted some representative sampling of the site and found a pile of PCB contaminated soil. The contaminated soil was sent to CWM Services of Model City, N.Y. The Department was not informed of this action.

After Tom had checked the manifests and other paperwork he told Mr. Fischer that he would be in touch with him soon regarding possible

violations. I also informed Mr. Fischer that the Administrative Consent Order for the site will be issued shortly. We left the site at 3:45.

kj

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
METRO BUREAU OF REGIONAL ENFORCEMENT
2 BABCOCK PLACE
WEST ORANGE, NEW JERSEY 07052

November 5 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Neil Fischer, Secretary - Treasurer
Central Steel Drum Company
704 Doremus Avenue
Newark, NJ 07105

Re: The New Jersey Pollutant Discharge Elimination System
Central Steel Drum Company
Newark/Essex County

Dear Mr. Fisher:

An inspection of your facility was conducted on September 9, 1990 by a representative of this Division. During this inspection, it was learned that wash water from the drum cleaning operation and waste residue around the incinerator area are ultimately discharged to the surface waters of the State. This activity is governed by the New Jersey Pollutant Discharge Elimination System (NJPDES) Regulations, N.J.A.C. 7:14A-1 et seq. These regulations state: "No person shall discharge any pollutant except in conformity with a valid NJPDES permit." Our records indicate no such permit exists for your facility.

You are therefore directed to obtain a NJPDES permit for the discharge at your facility within thirty (30) days of receipt of this correspondence. Permit application forms can be obtained by contacting:

Mr. George Caporale, Chief
Bureau of Information Systems
Management Services Element
Division of Water Resources
P.O. Box CN-029
Trenton, NJ 08625

BB0000029

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Any questions concerning the completion of the application should be addressed to Mr. Caporale or the BIS staff, who may be reached at (609) 984-4425. The completed application must be sent to Mr. Caporale, with a copy of the cover letter to this writer.

Failure to comply with this directive may result in further enforcement action by this office, including the imposition of penalties, pursuant to N.J.S.A. 58:10A-10. Therefore, kindly devote your full attention to this matter. If you have any questions concerning this directive, please contact Theophilus N. Ashie at (201) 669-3900.

Very truly yours,

Janet Budesa Carroll
Acting Supervisor
Surface Water and
Sewer System Enforcement
Metro Bureau of
Regional Enforcement

E29:G25

c: Mr. George Caporale, BIS
Dr. Adewale Troutman, H.O.
Theodore Hayes, BGWDC

bc: Zaheer M. Hussain, Enforcement
James Lyko, Criminal Justice
Central File
Division of Hazard Wast Mgt., Metro Field Office
Gloria T. Grant

NUS CORPORATION
A Halliburton Company

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
EXECUTIVE SUMMARY

Central Steel Drum **Site Name**	NJD011482577 EPA Site ID Number
704 Doremus Avenue Newark, New Jersey **Address**	02-8511-15 TDD Number

SITE DESCRIPTION

Central Steel Drum, which currently occupies the site, recondition[s] steel drums received from various industries ranging from food to [illegible] manufacturing. The initial phase of reconditioning involves incineration; this is followed by sand blasting and repainting. Central Steel Drum has been in operation since 1951. Prior to this the site was occupied by a manufacturer which is now part of what is known as Inmont Chemical Corporation. The site occupies eight acres.

The NJDEP has closely followed site operations since 1980. Past methods of improper ash disposal include open piles and mixing of ash with on site fill. Ash is currently stored in roll off containers and is manifested under Resource Conservation and Recovery Act (RCRA) law. In addition, state inspection reports record residue from drums received being spilled on the ground.

The site is located in the industrial area on Newark Bay east of the NJ Turnpike and north of Newark International Airport. The site is situated on filled marsh land. The residential area begins 1.5 miles from the site (Ironbound section of Newark). On site drainage ditches feed into Newark Bay and groundwater recharges the industrially used Brunswick aquifer west-northwest of the site.

On February 6, 1986, a site inspection was conducted by NUS Corporation Region II FIT. Four soil, three groundwater, and one surface water sample were collected and analyzed for hazardous substance list (HSL) chemicals.

HAZARD RANKING SCORE: $S_M = 4.70$ ($S_{gw} = 3.28$ $S_{sw} = 7.44$ $S_a = 0$)

$S_{FE} = 0$

$S_{DC} = 0$

BB0000030

Prepared by: Daniel Caramagno
of NUS Corporation

Date: 2/14/86

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
NJ D0114825?

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
Central Steel Drum

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
704 Doremus Avenue

03 CITY
Newark

04 STATE | 05 ZIP CODE | 06 COUNTY | 07 COUNTY CODE | 08 CONG DIS
NJ | 07105 | Essex | 013 | 10

09 COORDINATES
LATITUDE: 4 0° 4 2' 3 0". N
LONGITUDE: 7 4° 0 7' 3 0". W

10 TYPE OF OWNERSHIP (Check one)
X A. PRIVATE _ B. FEDERAL _ C. STATE
_ D. COUNTY _ E. MUNICIPAL _ F. OTHER
_ G. UNKNOWN

III. INSPECTION INFORMATION

01 DATE OF INSPECTION: 2 / 5 / 86 (MONTH DAY YEAR)

02 SITE STATUS
X ACTIVE
_ INACTIVE

03 YEARS OF OPERATION
1951 (BEGINNING YEAR) / Current (ENDING YEAR) _ UNKNOWN

AGENCY PERFORMING INSPECTION (Check all that apply)
_ A. EPA X B. EPA CONTRACTOR NUS Corporation (Name of firm)
_ C. MUNICIPAL _ D. MUNICIPAL CONTRACTOR _____ (Name of firm)
_ E. STATE _ F. STATE CONTRACTOR _____ (Name of firm)
_ G. OTHER _____ (Specify)

05 CHIEF INSPECTOR	06 TITLE	07 ORGANIZATION	08 TELEPHONE NO.
Daniel Caramagno	Chemical Engineer	NUS Corporation	(201) 225-6160
09 OTHER INSPECTORS	**10 TITLE**	**11 ORGANIZATION**	**12 TELEPHONE NO.**
Rick Adkisson	Environmental Scientist	NUS Corporation	(201) 225-6160
Richard Pagano	Geologist	NUS Corporation	(201) 225-6160
Luke Darragh	Environmental Scientist	NUS Corporation	(201) 225-6160
Don Hessemer	Environmental Scientist	NUS Corporation	(201) 225-6160

13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE	15 ADDRESS	16 TELEPHONE NO.
Bruce Doremus	Environmental Consultant	Environics	(201) 272-3770
Alan Fischer	President	Central Steel Drum 704 Doremus Ave., Newark, NJ	(201) 344-9500

17 ACCESS GAINED BY (Check one)	18 TIME OF INSPECTION	19 WEATHER CONDITIONS
X PERMISSION _ WARRANT	0930	Cloudy, 35°F, slight breeze from the south

IV. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NO.
Diana Messina	U.S. EPA	(201) 321-6685

04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NO.	08 DATE
Daniel Caramagno				

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- _ A. SOLID
- _ B. POWDER, FINES
- X C. SLUDGE
- X D. OTHER Ash (Specify)
- _ E. SLURRY
- X F. LIQUID
- _ G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS Unknown
CUBIC YARDS Unknown
NO. OF DRUMS Unknown

03 WASTE CHARACTERISTICS [illegible]

- X A. TOXIC
- _ B. CORROSIVE
- _ C. RADIOACTIVE
- X D. PERSISTENT
- _ E. SOL[illegible]
- _ F. INFE[illegible]
- _ G. FLAM[illegible]
- _ H. IGNI[illegible]
- _ [illegible]
- _ [illegible]
- _ [illegible]
- _ [illegible]
- _ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	Unkrown		Ash fro[illegible] incineration operation [illegible] currently stored in roll off container and is manifested [illegible] RCRA [illegible]. Prior to this [illegible] stored in pile or spread [illegible] on site. Other substances [illegible] are [illegible] result of drum [illegible] being spilled on the ground. [illegible] potential source of [illegible] painting operations.
OLW	OILY WASTE	Unknown		
SOL	SOLVENTS	Unknown		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	Unknown		

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
MES	Lead	7439-92-1	Unknown	32,1[illegible]	[illegible]
MES	Zinc	7440-66-6	Unknown	[illegible]	[illegible]
OCC	1,1,2,2 Tetrachloroethane	127-18-4	Unknown	[illegible]	ug/kg
OCC	Ethylbenzene	100-41-4	Unknown	[illegible]	ug/kg
OCC	Xylenes	1330-20-7	Unknown	[illegible]	ug/kg
SOL	Toluene	108-88-3	Unknown	17	ug/kg
SOL	2-Hexanone	591-78-6	Unknown	5.[illegible]	ug/kg
PSD	Chlordane	57-74-9	Unknown	150000	ug/kg
SOL	Tetrachloroethene	127-18-4	Unknown	3900	ug/kg
PSD	4,4-DDE	72-55-9	Unknown	1[illegible]00	ug/kg
SOL	Methylene Chloride	75-09-2	Unknown	[illegible]15	ug/kg
SOL	2-Butanone	78-93-3	Unknown	3872	ug/kg
OCC	Isophorone	78-59-1	Unknown	340	ug/kg
OCC	4-Methyl-2-Pentanone	108-10-1	Unknown	[illegible]	ug/kg
OCC	Styrene	100-42-5	Unknown	[illegible]	ug/kg
SOL	Phenol	108-95-2	Unknown	[illegible]	ug/kg
OCC	4-Methyphenol	106-44-5	Unknown	<5.7	ug/kg
OCC	Benzo (b) Fluoranthene	205-99-2	Unknown	<20	ug/kg
SOL	1,2,4 Trichlorobenzene	120-82-1	Unknown	<2000	ug/kg
OCC	Napthalene	91-20-3	Unknown	<220	ug/kg
OCC	2-Methylnaphthalene	91-57-6	Unknown	<310	ug/kg
OCC	Phenanthrene	85-01-8	Unknown	<120	ug/kg
OCC	Fluoranthene	206-44-0	Unknown	<200	ug/kg
			Unknown	<310	ug/kg

SEE ATTACHMENT A

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	N/A		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (See specific references. e.g., state files, sample analysis, reports)

Malcolm Pirnie Preliminary Assessment of 3/5/85
Site Inspection 2/5/86 - NUS FIT Region II
U.S. EPA Contract Laboratory Program Sample Management Office. Analytical results of samples collected 2/5/86 by NUS Corporation FIT II

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
OCC	Pyrene	129-00-0	Unknown	<300	ug/kg
OCC	Chrysene	218-01-9	Unknown	<190	ug/kg
OCC	Benzo (b) Fluoranthene	205-99-2	Unknown	<550	ug/kg
OCC	Benzo (k) Fluoranthene	207-08-9	Unknown	<270	ug/kg
OCC	Benzo (a) Pyrene	50-32-8	Unknown	<310	ug/kg
SOL	1,1-Dichloroethene	75-35-4	Unknown	<2.4	ug/kg
SOL	1,1,1-Trichloroethane	71-55-2	Unknown	<3.5	ug/kg
OCC	Bromoform	75-25-2	Unknown	<2.4	ug/kg

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 X A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 0
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

NJDEP inspection found drum residue spill stains, improper ash disposal and poor housekeeping. Site inspection of 2/5/86 found spilled drums and stained soil. Groundwater use is industrial only. Site groundwater sampled on [illegible] contained numerous contaminants.

01. X B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 0
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

A drainage ditch leading to Newark Bay was found to contain an oily surface sheen. According to NJDEP [illegible] contained rusted drums and sludge deposits. Surface water is not used for drinking, therefore population [illegible] however, there are boating marinas in Jersey City for recreational vessels. Surface water sample [illegible] various contaminants.

01 X C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: 0
02 X OBSERVED (DATE: 2/5/86)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

In 1981 NJDEP inspection reported HNU readings in excess of 2000 ppm. Smoke from the incinerator was [illegible] violations have been cited by NJDEP. However, no air readings above background were observed on 2/5/86. Residential population is beyond one mile from the site.

01. _ D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

No potential exists.

01. X E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: 0
02 X OBSERVED (DATE: 2/5/86)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

Though site is three quarters fenced, back property is open to marsh and gate is open and unattended [illegible] No residences are within one mile, and only workers are possibly affected.

01 X F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: 8 (ACRES)
02 X OBSERVED (DATE: 2/5/86)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

NJDEP inspections found various stains on the ground and drums were found leaking their contents on the ground. Site inspection of 2/5/86 confirmed this.

01. _ G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

No potential exists as the source of drinking water for Newark is several miles distant.

01 X H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: 110
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
X POTENTIAL _ ALLEGED

Potential for exposure exists due to spills and contaminated soil.

01 _ I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: _____
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

No potential exists because the area within a mile radius of the site is industrial.

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

X J. DAMAGE TO FLORA — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 NARRATIVE DESCRIPTION

Low potential exists as area is industrial in nature. However contamination of Newark Bay life may occur as a result of drainage off site.

X K. DAMAGE TO FAUNA — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

Low potential exists as area is industrial in nature, though contamination of aquatic life may occur through site drainage.

X L. CONTAMINATION OF FOOD CHAIN — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

Low potential exists as surface drainage may contaminate life in Newark Bay.

X M. UNSTABLE CONTAINMENT OF WASTES — 02 X OBSERVED (DATE: 3/28/80) _ POTENTIAL _ ALLEGED
(Spills/runoff/standing liquids/leaking drums)
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Incinerator ash was formerly stored on an open concrete slab. Storage is now in roll off containers at slab area.

X N. DAMAGE TO OFFSITE PROPERTY — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

Drainage ditch passes other property in Newark Bay area.

X O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

Potential exists if heavy rains cause overflow and runoff.

X P. ILLEGAL/UNAUTHORIZED DUMPING — 02 X OBSERVED (DATE: 3/28/80) _ POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

NJDEP noted Central Steel Drum as operating a Treatment/Storage/Disposal (TSD) facility without proper authorization. Since that time Central Steel Drum has improved in their compliance to RCRA regulations. Sand pile noted on Site Reconnaissance 1/30/86 by NUS FIT.

III. DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None

III. TOTAL POPULATION POTENTIALLY AFFECTED: 110 (Central Steel Drum Employees Only)

IV. COMMENTS

Due to industrial setting the only direct exposure is to daily workers. Water use in area is either industrial or non-existent. Since the NJDEP investigations Central Steel Drum has made an effort to improve waste manifesting and incineration.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Malcolm Pirnie Preliminary Assessment of 3/5/85
Site Inspection 2/5/86 - NUS FIT Region II

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED (Check all that apply)	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
_ A. NPDES				
_ B. UIC				
X C. AIR State Permit	0067438	08/11/82		Permit for three boilers burning natural
X D. RCRA	NJD011482577	10/09/80		Generator ID Number
_ E. RCRA INTERIM STATUS				
_ F. SPCC PLAN				
_ G. STATE (Specify)				
_ H. LOCAL (Specify)				
_ I. OTHER (Specify)				
_ J. NONE				

III. SITE DESCRIPTION

01 Storage/Disposal (Check all that apply)	02 AMOUNT	03 UNIT OF MEASURE	04 TREATMENT (Check all that apply)	05 OTHER
_ A. SURFACE IMPOUNDMENT			X A. INCINERATION	_ A. OFF-SITE
X B. PILES		unknown	_ B. UNDERGROUND INJECTION	
_ C. DRUMS, ABOVE GROUND			_ C. CHEMICAL/PHYSICAL	
_ D. TANK, ABOVE GROUND			_ D. BIOLOGICAL	_ B. ON-SITE
_ E. TANK, BELOW GROUND			_ E. WASTE OIL PROCESSING	
_ F. LANDFILL			_ F. SOLVENT RECOVERY	
_ G. LANDFARM			_ G. OTHER RECYCLING/RECOVERY	
_ H. OPEN DUMP			_ H. OTHER	
X I. OTHER Roll off containers (Specify) Onsite fill	20	cu. yds. unknown	(Specify)	(Specify)

06 COMMENTS

Since the beginning of NJDEP inspections in 1980, Central Steel Drum has made an effort to conform to regulations concerning waste handling and incineration. Also, immediate area of site is heavily contaminated from past practices. The site inspection was conducted to determine the extent of contaminant release.

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)

_ A. ADEQUATE, SECURE _ B. MODERATE _ C. INADEQUATE, POOR X D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.

Drums received are "empty" for reprocessing. However on site inspection found several drum spills staining the ground. Waste is stored in two roll off containers and is manifested for disposal. Containers are on concrete slabs but slab is covered with mud and spilled material and is barely discernable. Ash was previously stored in piles and mixed with on site fill.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: X YES _ NO

02 COMMENTS

Site is fenced on three sides and is open to an area containing thick, tall grass. Gate is open during working hours and not guarded. As a result, entrance is easily obtained.

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Malcolm Pirnie Preliminary Assessment of 2/5/85
Site Inspection 2/5/86 - NUS FIT Region II

SITE INSPECTION REPORT
PART 5 - DEMOGRAPHIC, AND ENVIRONMENTAL DAT

01 STATE 02 SITE NUMBER
NJ D011483877

II. DRINKING WATER SUPPLY

01 TYPE OF DRINKING SUPPLY (Check as applicable)

	SURFACE	WELL
COMMUNITY	A. X	B. _
NON-COMMUNITY	C. _	D. _

02 STATUS

ENDANGERED	AFFECTED	MONITORED
A.	B. _	C. _
D. X	E. _	F. _

03 DISTANCE TO SITE
A. >3 (mi)
B. N/A (mi)

III. GROUNDWATER

01 GROUNDWATER USE IN VICINITY (Check one)

_ A. ONLY SOURCE FOR DRINKING _ B. DRINKING (Other sources available) COMMERCIAL, INDUSTRIAL, IRRIGATION (No other water sources available) X C. COMMERCIAL, INDUSTRIAL, IRRIGATION (Limited other sources available) _ D. NOT USED, UNUSEABLE

02 POPULATION SERVED BY GROUND WATER: 0

03 DISTANCE TO NEAREST DRINKING WATER WELL: N/A (mi)

04 DEPTH TO GROUNDWATER	05 DIRECTION OF GROUNDWATER FLOW	06 DEPTH TO AQUIFER OF CONCERN	07 POTENTIAL YIELD OF AQUIFER	08 SOLE SOURCE AQUIFER
3 (ft)	WNW	20 (ft)	2.0 x 10^7 (gpd)	_ YES X NO

09 DESCRIPTION OF WELLS (Including useage, depth, and location relative to population and buildings)

Wells are commercially owned and are west and northwest of site. Wells vary from 200-900 feet in depth and average about 350 ft. No drinking wells are present. Nearest down gradient well is on Delancey Street, Newark and is owned by Rutherford and Delancey Holding Corporation. The nearest well is one mile from the site. All the wells to the west of the site tap the Brunswick Aquifer which is charged by Newark Bay. Groundwater flow is away from Newark Bay because of heavy pumping conditions in Newark.

10 RECHARGE AREA

X YES NO COMMENTS: Newark Bay recharges aquifer of concern.

11. DISCHARGE AREA

X YES NO COMMENTS: Water recharges Brunswick Formation to the west.

IV. SURFACE WATER

01 SURFACE WATER USE (Check one)

X A. RESERVOIR, RECREATION DRINKING WATER SOURCE _ B. IRRIGATION, ECONOMICALLY IMPORTANT RESOURCES _ C. COMMERCIAL, INDUSTRIAL _ D. NOT CURRENTLY USED

02 AFFECTED/POTENTIALLY AFFECTED BODIES OF WATER

NAME:	AFFECTED	DISTANCE TO SITE
Passaic River		1.0 (mi)
Newark Bay		0.75 (mi)
Drainage Ditch (Ditch is deep and filled with water year round)	X	On site (mi)

V. DEMOGRAPHIC AND PROPERTY INFORMATION

01 TOTAL POPULATION WITHIN (Population figures are based on residential only)

ONE (1) MILE OF SITE	TWO (2) MILES OF SITE	THREE (3) MILES OF SITE
A. 0 NO. OF PERSONS	B. 53900 NO. OF PERSONS	C. 186900 NO. OF PERSONS

02 DISTANCE TO NEAREST POPULATION
1.5 (mi)

03 NUMBER OF BUILDINGS WITHIN TWO (2) MILES OF SITE
19900

04 DISTANCE TO NEAREST OFF-SITE BUILDING
<0.1 (mi)

05 POPULATION WITHIN VICINITY OF SITE (Provide narrative description of nature of population within vicinity of site. e.g., rural, village, densely populated urban area)

The immediate vicinity of the site contains industrial property. To the south is Newark International Airport (½ mile distance). To the west, at a distance of about 1.5 miles, is the densely populated Ironbound section of Newark. Newark Bay is east of the site. North of the site are several industrial complexes which contain marine facilities heavily served by commercial shipping.

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

II. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one)

X A. 10^{-6} - 10^{-8} cm/sec _ B. 10^{-4} - 10^{-6} cm/sec _ C. 10^{-4} - 10^{-3} cm/sec _ D. GREATER THAN 10^{-3} cm/sec

Soil is fill over marsh land with a clay lense over the aquifer of concern.

02 PERMEABILITY OF BEDROCK (Check one)

_ A. IMPERMEABLE (Less than 10^{-6} cm/sec) X B. RELATIVELY IMPERMEABLE (10^{-4} - 10^{-6} cm/sec) _ C. RELATIVELY PERMEABLE (10^{-2} - 10^{-4} cm/sec) _ D. VERY PERMEABLE (Greater than 10^{-2} cm/sec)

03 DEPTH TO BEDROCK: 40 (ft)

04 DEPTH OF CONTAMINATED SOIL ZONE: Unknown (ft)

05 SOIL pH: 6.8 - 7.6

06 NET PRECIPITATION: 14 (in)

07 ONE YEAR 24 HOUR RAINFALL: 2.75 (in)

08 SLOPE
SITE SLOPE: 0-1 %
DIRECTION OF SITE SLOPE: East
TERRAIN AVERAGE SLOPE: 0-1 %

09 FLOOD POTENTIAL

SITE IS IN 100 YEAR FLOODPLAIN _ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

10 DISTANCE TO WETLANDS (5 acre minimum)

ESTUARINE: A. 2.5 (mi)
OTHER: B. N/A (mi)

11 DISTANCE TO CRITICAL HABITAT (of endangered species)

[illegible] (mi)

ENDANGERED SPECIES: N/A

12 LAND USE IN VICINITY

DISTANCE TO:

COMMERCIAL/INDUSTRIAL	RESIDENTIAL AREAS: NATIONAL/STATE PARKS, FORESTS, OR WILDLIFE RESERVES	PRIME AG LAND	AGRICULTURAL LAND (AG LAND)
A. Adjacent (mi)	B. 1.5 (mi)	C. 3 (mi)	D. [illegible] (mi)

13 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

The site is located about one mile west of Newark Bay and North of Newark International Airport. The area is flat with less than 1% slope. The surrounding area is former wetland that has been filled in. Drainage "Streams" or ditches are located on site and lead into Newark Bay.

III. SOURCES OF INFORMATION (Cite specific references e.g., state files, sample analysis, reports)

William D. Nichols, Groundwater Resources of Essex County, New Jersey: Special Report 28, United States Geological Survey
Telecon with Sy Goodman - USDA, 4/3/85
Preliminary Report on the Geology and Groundwater Supply of Newark, New Jersey Area; Special Report #1 New Jersey Department of Conservation and Economic Development
Paul B. Dahlgren, Hydrogeologic Assessment for Central Streel Drum, Environics Inc.

II. SAMPLES TAKEN

SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 SAMPLES SENT TO	03 ESTIMATED DATE RESULTS AVAILABLE
GROUNDWATER	3	All Organics Sent To:	
SURFACE WATER	1	Environmental Testing and Certification Labs	
WASTE		284 Raritan Center Parkway	
AIR		Edison, NJ 08818	
RUNOFF			
SPILL		All Inorganics Sent To:	
SOIL	4	JTC Environmental Consultants Inc.	
VEGETATION		Four Research Place, Suite L-10	
OTHER		Rockville, Maryland 20850	

III. FIELD MEASUREMENTS TAKEN

01 TYPE	02 COMMENTS
Air	OVA, HNU used for checking air contamination for Health and Safety reasons. No readings above background except upon well opening.

IV. PHOTOGRAPHS AND MAPS

01 TYPE X GROUND _ AERIAL

02 IN CUSTODY OF NUS Corporation - FIT II
(Name of organization or individual)

03 MAPS	04 LOCATION OF MAPS
X YES _ NO	NUS Corporation - FIT II Region Office

V. OTHER FIELD DATA COLLECTED (Provide narrative description)

Field Notebook #1864 filed under TOD #02-8511-15.

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Site Inspection, 2/5/86 - NUS FIT Region II

SITE INSPECTION
PART 7 - OWNER INFORMATION

II. CURRENT OWNER(S)

01 NAME	02 D + B NUMBER	08 NAME	09 D + B NUMBER
Central Steel Drum			
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE	10 STREET ADDRESS (P.O. Box, RFD#, etc.)	11 SIC CODE
704 Doremus Avenue			
05 CITY / 06 STATE	07 ZIP CODE	12 CITY / 13 STATE	14 ZIP CODE
Newark NJ	07105		

01 NAME	02 D + B NUMBER	08	09 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE	10 STREET ADDRESS (P.O. Box, RFD#, etc.)	11 SIC CODE
05 CITY / 06 STATE	07 ZIP CODE	12 CITY / 13 STATE	14 ZIP CODE

01 NAME	02 D + B NUMBER	08 NAME	09 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE	10 STREET ADDRESS (P.O. Box, RFD#, etc.)	11 SIC CODE
05 CITY / 06 STATE	07 ZIP CODE	12 CITY / 13 STATE	14 ZIP CODE

01 NAME	02 D + B NUMBER	08 NAME	09 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE	10 STREET ADDRESS (P.O. Box, RFD#, etc.)	11 SIC CODE
05 CITY / 06 STATE	07 ZIP CODE	12 CITY / 13 STATE	14 ZIP CODE

III. PREVIOUS OWNER(S) (List most recent first)

01 NAME	02 D + B NUMBER
Inter Chemical (Inmont)	
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE
1255 Broad Street	
05 CITY / 06 STATE	07 ZIP CODE
Clifton NJ	07015

01 NAME	02 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE
05 CITY / 06 STATE	07 ZIP CODE

01 NAME	02 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE
05 CITY / 06 STATE	07 ZIP CODE

IV. REALTY OWNER(S) (If applicable; list most recent first)

01 NAME	02 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE
05 CITY / 06 STATE	07 ZIP CODE

01 NAME	02 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE
05 CITY / 06 STATE	07 ZIP CODE

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Site Inspection 2/5/86 - NUS FIT Region II

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 8 - OPERATOR INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
NJ D011462577

I. CURRENT OPERATOR(S)			OPERATOR'S PARENT COMPANY (If applicable)		
NAME	02 D + B Number		10 NAME		11 D + B NUMBER
ame as current owner) STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE		12 STREET ADDRESS (P.O. Box, RFD#, etc.)		13 SIC CODE
CITY 06 STATE	07 ZIP CODE		14 CITY	15 STATE	16 ZIP CODE
YEARS OF OPERATION 09 NAME OF OWNER					

I. PREVIOUS OPERATOR(S) (List most recent first: Provide only if different from owner)			PREVIOUS OPERATOR'S PARENT COMPANIES (If applicable)		
NAME	02 D + B Number		10 NAME		11 D + B NUMBER
Same as previous owner) STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE		12 STREET ADDRESS (P.O. Box, RFD#, etc.)		13 SIC CODE
CITY 06 STATE	07 ZIP CODE		14 CITY	15 STATE	16 ZIP CODE
YEARS OF OPERATION 09 NAME OF OWNER					
NAME	02 D + B Number		10 NAME		11 D + B NUMBER
STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE		12 STREET ADDRESS (P.O. Box, RFD#, etc.)		13 SIC CODE
CITY 06 STATE	07 ZIP CODE		14 CITY	15 STATE	16 ZIP CODE
YEARS OF OPERATION 09 NAME OF OWNER					
NAME	02 D + B Number		10 NAME		11 D + B NUMBER
STREET ADDRESS (P.O. Box, RFD#, etc.)	04 SIC CODE		12 STREET ADDRESS (P.O. Box, RFD#, etc.)		13 SIC CODE
CITY 06 STATE	07 ZIP CODE		14 CITY	15 STATE	16 ZIP CODE
YEARS OF OPERATION 09 NAME OF OWNER					

IV. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Site Inspection 2/5/86 - NUS FIT Region II

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

II. ON-SITE GENERATOR

01 NAME		02 D + B NUMBER
Central Steel Drum		NJD011482577
03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE
704 Doremus Avenue		
05 CITY	06 STATE	07 ZIP CODE
Newark	NJ	07105

III. OFF-SITE GENERATOR(S)

01 NAME		02 D + B NUMBER	01 NAME		02 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE
05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

01 NAME		02 D + B NUMBER	01 NAME		02 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE
05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

IV. TRANSPORTER(S)

01 NAME		02 D + B NUMBER	01 NAME		02 D + B NUMBER
National Corporate Disposal					
03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE
68 East Main Street					
05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE
Bogota	NJ				

01 NAME		02 D + B NUMBER	01 NAME		02 D + B NUMBER
03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD#, etc.)		04 SIC CODE
05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Site Inspection 2/5/86 - NUS FIT Region II

II. PAST RESPONSE ACTIVITIES

01 ___ A. WATER SUPPLY CLOSED
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ B. TEMPORARY WATER SUPPLY PROVIDED
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ C. PERMANENT WATER SUPPLY PROVIDED
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ D. SPILLED MATERIAL REMOVED
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ E. CONTAMINATED SOIL REMOVED
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ F. WASTE REPACKAGED
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ G. WASTE DISPOSED ELSEWHERE
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ H. ON SITE BURIAL
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ I. IN SITU CHEMICAL TREATMENT
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ J. IN SITU BIOLOGICAL TREATMENT
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ K. IN SITU PHYSICAL TREATMENT
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ L. ENCAPSULATION
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ M. EMERGENCY WASTE TREATMENT
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ N. CUTOFF WALLS
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ O. EMERGENCY DIKING/SURFACE WATER DIVERSION
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ P. CUTOFF TRENCHES/SUMP
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.
01 ___ Q. SUBSURFACE CUTOFF WALL
04 DESCRIPTION

02 DATE: _____ 03 AGENCY: _____

Not applicable.

II. PAST RESPONSE ACTIVITIES

01 ___ R. BARRIER WALLS CONSTRUCTED 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ S. CAPPING/COVERING 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ T. BULK TANKAGE REPAIRED 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ U. GROUT CURTAIN CONSTRUCTED 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ V. BOTTOM SEALED 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ W. GAS CONTROL 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ X. FIRE CONTROL 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ Y. LEACHATE TREATMENT 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ Z. AREA EVACUATED 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ 1. ACCESS TO SITE RESTRICTED 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ 2. POPULATION RELOCATED 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

01 ___ 3. OTHER REMEDIAL ACTIVITIES 02 DATE: _____ 03 AGENCY: _____
04 DESCRIPTION

Not applicable.

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Site Inspection 2/5/86 - NUS FIT Region II

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
NJ D011483577

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY/ENFORCEMENT ACTION X YES _ NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

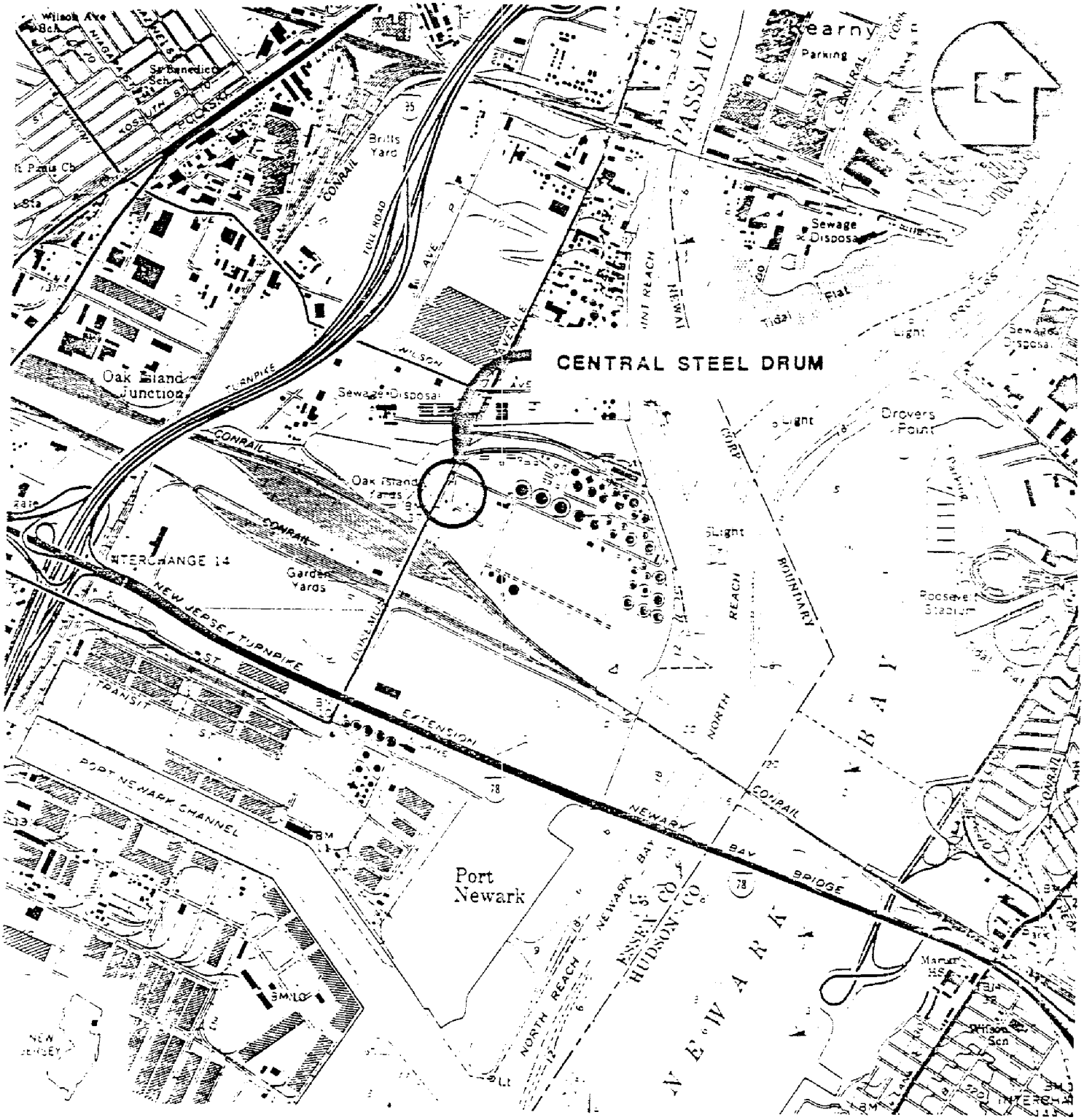
(1) 3/28/80 - Notice of Prosecution (NOP) to Central Steel Drum for improper ash disposal. CSD cited for illegally operating Treatment Storage Disposal facility (RCRA).

(2) Cited violations concerning incinerator emissions on February 8, 1982. Violations included capacity, past operation without a permit, and open burning.

(3) NJDEP-DWR required groundwater study in 1983.

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, report)

Telecon, Kevin Krouse of NJDEP - (201) 669-3960
Malcolm Pirnie, Preliminary Assessment of 3/5/85



(QUAD) ELIZABETH, N.J.

FIGURE A-1

SITE LOCATION MAP

CENTRAL STEEL DRUM, NEWARK, N.J.

(NOT TO SCALE)

NUS CORPORATION

A Halliburton Company

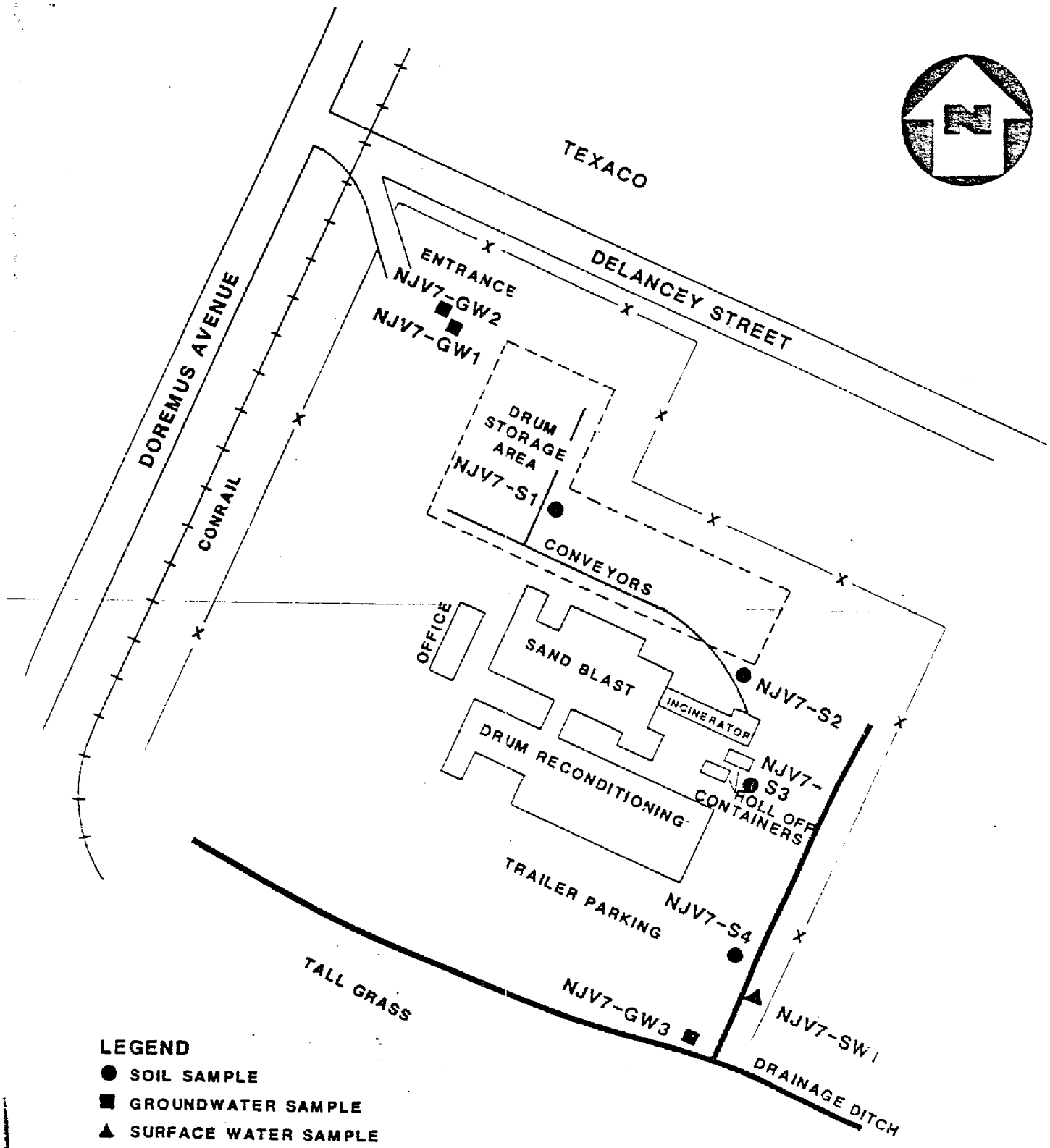


FIGURE A-2

SAMPLE LOCATION MAP

CENTRAL STEEL DRUM, NEWARK, N.J.

(NOT TO SCALE)

NUS CORPORATION
A Halliburton Company

TABLE 1

Sample Descriptions

Central Steel Drum

Newark, New Jersey

CASE #5507

Sample ID Number	Organic Traffic Report #	Inorganic Traffic Report #	Date	Time (Hours)	Sample Type	Sample Location
S1	BF590	MBF433	2/05/86	1108	Soil	Adjacent to conveye belt in drain staging area.
S2	BF591	MBF434	2/05/86	1126	Soil	Fifty feet from incir erator adjacent to conveyor belt.
S3	BF592	MBF435	2/05/86	1135	Soil	Adjacent to manifes waste storage on south side of incinerator.
S4	BF593	MBF436	2/05/86	1555	Soil	Adjacent to drainag ditch at southeast c of property.
GW1	BF583	MBF426	2/05/86	1235	Aqueous	Shallow well #102 b entrance.
GW2	BF584	MBF427	02/85/86	1400	Aqueous	Deep well #202 by entrance.
GW3	BF585	MBF428	2/05/86	1545	Aqueous	Deep well #204 at southeast corner of property.
SW1	BF589	MBF432	2/05/86	1500	Aqueous	Surface water from drainage ditch at southeast corner of property.
Blank-1	BF594	MBF437	2/05/86	N/A	Sample Blank	U.S. EPA Lab Edison, NJ.

ORGANIC DATA REPORTING QUALIFIERS

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of such flags must be explicit.

Value -If the result is a value greater than or equal to the detection limit, report the value.

U -Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g., 10U) based on necessary concentration/dilution actions. (This is not necessarily the instrument detection limit.) The footnote should read: U-Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample.

J -Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicates the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero. (e.g., 10J)

C -This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides $\geq$10 ng/ul in the final extract should be confirmed by GC/MS.

B -This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action.

Other -Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report.

Sample Number
BF590

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp. Case No: 5507

Lab Sample ID No: L1495V QC Report No: QV4400

Sample Matrix: Soil Contract No: 68-01-6766, 6788, 6789, 6790

Data Release Authorized By: C. Dwyer Date Sample Received: 2/6/86

Volatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/13/86

Date Analyzed: 2/13/86

Conc/Dil Factor: 1 pH 6.9

Percent Moisture: (Not Decanted) 21.0%

CAS Number		ug/l or ug/Kg (Circle One)	
74-87-3	Chloromethane	5.1 U	
74-83-9	Bromomethane	5.1 U	
75-01-4	Vinyl Chloride	5.1 U	
75-00-3	Chloroethane	5.1 U	
75-09-2	Methylene Chloride	100 B	CO
67-64-1	Acetone	180 B	CO
75-15-0	Carbon Disulfide	5.1 U	
75-35-4	1, 1-Dichloroethene	5.1 U	
75-34-3	1, 1-Dichloroethane	5.1 U	
156-60-5	Trans-1, 2-Dichloroethene	5.1 U	
67-66-3	Chloroform	5.1 U	
107-06-2	1, 2-Dichloroethane	5.1 U	
78-93-3	2-Butanone	5.1 U	
71-55-6	1, 1, 1-Trichloroethane	160	CO
56-23-5	Carbon Tetrachloride	5.1 U	
108-05-4	Vinyl Acetate	5.1 U	
75-27-4	Bromodichloromethane	5.1 U	

CAS Number		ug/l or ug/Kg (Circle One)	
78-87-5	1, 2-Dichloropropane	5.1 U	
10061-02-6	Trans-1, 3-Dichloropropene	5.1 U	
79-01-6	Trichloroethene	5.1 U	
124-48-1	Dibromochloromethane	5.1 U	
79-00-5	1, 1, 2-Trichloroethane	5.1 U	
71-43-2	Benzene	5.1 U	
10061-01-5	cis-1, 3-Dichloropropene	5.1 U	
110-75-8	2-Chloroethylvinylether	5.1 U	
75-25-2	Bromoform	5.1 U	
108-10-1	4-Methyl-2-Pentanone	5.1 U	
591-78-6	2-Hexanone	5.1 U	
127-18-4	Tetrachloroethene	5.1 U	
79-34-5	1, 1, 2, 2-Tetrachloroethane	5.1 U	
108-88-3	Toluene	8.6	
108-90-7	Chlorobenzene	5.1 U	
100-41-4	Ethylbenzene	7.1	
100-42-5	Styrene	5.1 U	
	Total Xylenes	56.8	CO

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of each flag must be explicit.

Value If the result is a value greater than or equal to the detection limit, report the value

U Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g., 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read: U-Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample

J Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero (e.g., 10J). If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J

C This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS

B This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action

Other Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report

Laboratory Name: ETC Corp

Case No: 5507

Sample Number: BF590

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: Low (Medium) (Circle One)

Date Extracted/Prepared: 2/25/86

Date Analyzed: 3/8/86 (MM)

Conc/Dil Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	23000 U
108-95-2	Phenol	46000 U
62-53-3	Aniline	23000 U
111-44-4	bis(-2-Chloroethyl)Ether	23000 U
95-57-8	2-Chlorophenol	46000 U
541-73-1	1, 3-Dichlorobenzene	23000 U
106-46-7	1, 4-Dichlorobenzene	23000 U
100-51-6	Benzyl Alcohol	23000 U
95-50-1	1, 2-Dichlorobenzene	23000 U
95-48-7	2-Methylphenol	46000 U
39638-32-9	bis(2-chloroisopropyl)Ether	23000 U
106-44-5	4-Methylphenol	46000 U
621-64-7	N-Nitroso-Di-n-Propylamine	23000 U
67-72-1	Hexachloroethane	23000 U
98-95-3	Nitrobenzene	23000 U
78-59-1	Isophorone	23000 U
88-75-5	2-Nitrophenol	46000 U
105-67-9	2, 4-Dimethylphenol	46000 U
65-85-0	Benzoic Acid	46000 U
111-91-1	bis(-2-Chloroethoxy)Methane	23000 U
120-83-2	2, 4-Dichlorophenol	46000 U
120-82-1	1, 2, 4-Trichlorobenzene	23000 U
91-20-3	Naphthalene	23000 U
106-47-8	4-Chloroaniline	23000 U
87-68-3	Hexachlorobutadiene	23000 U
59-50-7	4-Chloro-3-Methylphenol	46000 U
91-57-6	2-Methylnaphthalene	23000 U
77-47-4	Hexachlorocyclopentadiene	23000 U
88-06-2	2, 4, 6-Trichlorophenol	46000 U
95-95-4	2, 4, 5-Trichlorophenol	46000 U
91-58-7	2-Chloronaphthalene	23000 U
88-74-4	2-Nitroaniline	23000 U
131-11-3	Dimethyl Phthalate	23000 U
208-96-8	Acenaphthylene	23000 U
99-09-2	3-Nitroaniline	23000 U

CAS Number		ug/l or ug/Kg (Circle One)
83-32-9	Acenaphthene	23000 U
51-28-5	2, 4-Dinitrophenol	46000 U
100-02-7	4-Nitrophenol	46000 U
132-64-9	Dibenzofuran	23000 U
121-14-2	2, 4-Dinitrotoluene	23000 U
606-20-2	2, 6-Dinitrotoluene	23000 U
84-66-2	Diethylphthalate	23000 U
7005-72-3	4-Chlorophenyl-phenylether	23000 U
86-73-7	Fluorene	23000 U
100-01-6	4-Nitroaniline	23000 U
534-52-1	4, 6-Dinitro-2-Methylphenol	46000 U
86-30-6	N-Nitrosodiphenylamine (1)	23000 U
101-55-3	4-Bromophenyl-phenylether	23000 U
118-74-1	Hexachlorobenzene	23000 U
87-86-5	Pentachlorophenol	46000 U
85-01-8	Phenanthrene	23000 U
120-12-7	Anthracene	23000 U
84-74-2	Di-n-Butylphthalate	23000 U
206-44-0	Fluoranthene	23000 U
92-87-5	Benzidine	23000 U
129-00-0	Pyrene	23000 U
85-68-7	Butylbenzylphthalate	23000 U
91-94-1	3, 3'-Dichlorobenzidine	23000 U
56-55-3	Benzo(a)Anthracene	23000 U
117-81-7	bis(2-Ethylhexyl)Phthalate	17000 J
218-01-9	Chrysene	23000 U
117-84-0	Di-n-Octyl Phthalate	23000 U
205-99-2	Benzo(b)Fluoranthene (MS)	2000 J
207-08-9	Benzo(k)Fluoranthene	23000 U
50-32-8	Benzo(a)Pyrene	23000 U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	23000 U
53-70-3	Dibenz(a, h)Anthracene	23000 U
191-24-2	Benzo(g, h, i)Perylene	23000 U

(1)-Cannot be separated from diphenylamine

Laboratory Name: _____

Case No: 5107

Sample Number: BF59C

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/12/87

Date Analyzed: 3/29/87

Conc/Dil Factor: (1) 50

CAS Number		ug/l or ug/Kg (Circle One)
319-84-6	Alpha-BHC	150U
319-85-7	Beta-BHC	150U
319-86-8	Delta-BHC	730U
58-89-9	Gamma-BHC (Lindane)	150U
76-44-8	Heptachlor	290U
309-00-2	Aldrin	290U
1024-57-3	Heptachlor Epoxide	1900U
959-98-8	Endosulfan I	530U
60-57-1	Dieldrin	760U
72-55-9	4,4'-DDE	590U
72-20-8	Endrin	1000U
33213-65-9	Endosulfan II	590U
72-54-8	4,4'-DDD	150U
7421-93-4	Endrin Aldehyde	1700U
1031-07-8	Endosulfan Sulfate	3600U
50-29-3	4,4'-DDT	290U
72-43-5	Methoxychlor	4500U
53494-70-5	Endrin Ketone	5900U
57-74-9	Chlordane	150000
8001-35-2	Toxaphene	17000U
12674-11-2	Aroclor-1016	9000U
11104-28-2	Aroclor-1221	7300U
11141-16-5	Aroclor-1232	840U
53469-21-9	Aroclor-1242	6200U
12672-29-6	Aroclor-1248	4500U
11097-69-1	Aroclor-1254	2300U
11096-82-5	Aroclor-1260	2400U

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s _____ or W_s 75 ; V_t 1000 V_i 3

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp.
Lab Sample ID No: L1496V
Sample Matrix: Soil
Lab Release Authorized By: A. Dunn

Case No: 5507
QC Report No: QV440C
Contract No: 68-01-6766, 6788, 6789, 6790
Date Sample Received: 2/5/86

Volatile Compounds

Concentration: (Low) Medium (Circle One)
Date Extracted/Prepared: 2/13/86
Date Analyzed: 2/13/86
Conc/Dil Factor: 1 pH 7.6
Percent Moisture: (Not Decanted) 38.7

CAS Number		ug/l or ug/Kg (Circle One)
74-87-3	Chloromethane	6.5U
74-83-9	Bromomethane	6.5U
75-01-4	Vinyl Chloride	6.5U
75-00-3	Chloroethane	6.5U
75-09-2	Methylene Chloride	95.8B
67-64-1	Acetone	120.8B
75-15-0	Carbon Disulfide	6.5U
75-35-4	1, 1-Dichloroethene	6.5U
75-34-3	1, 1-Dichloroethane	6.5U
156-60-5	Trans-1, 2-Dichloroethene	6.5U
67-66-3	Chloroform	6.5U
107-06-2	1, 2-Dichloroethane	6.5U
78-93-3	2-Butanone	560
71-55-6	1, 1, 1-Trichloroethane	6.5U
56-23-5	Carbon Tetrachloride	6.5U
108-05-4	Vinyl Acetate	6.5U
75-27-4	Bromodichloromethane	6.5U

CAS Number		ug/l or ug/Kg (Circle One)
78-87-5	1, 2-Dichloropropane	6.5U
10061-02-6	Trans-1, 3-Dichloropropene	6.5U
79-01-6	Trichloroethene	6.5U
124-48-1	Dibromochloromethane	6.5U
79-00-5	1, 1, 2-Trichloroethane	6.5U
71-43-2	Benzene	6.5U
10061-01-5	cis-1, 3-Dichloropropene	6.5U
110-75-8	2-Chloroethylvinylether	6.5U
75-25-2	Bromoform	6.5U
108-10-1	4-Methyl-2-Pentanone	6.5U
591-78-6	2-Hexanone	6.5U
127-18-4	Tetrachloroethene	6.5U
79-34-5	1, 1, 2, 2-Tetrachloroethane	6.5U
108-88-3	Toluene	56 Esq
108-90-7	Chlorobenzene	6.5U
100-41-4	Ethylbenzene	6.7
100-42-5	Styrene	6.5U
	Total Xylenes	30

Data Reporting Qualifiers

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U	Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g., 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read: U-Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample
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C	This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS
B	This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action
Other	Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report

Laboratory Name: ETC Corp.

Case No: 5507

Sample Number: BF591

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: Low **Medium** (Circle One)

Date Extracted/Prepared: 2/25/86

Date Analyzed: 3/4/86

Conc/Dil Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	30000U
108-95-2	Phenol	60000U
62-53-3	Aniline	30000U
111-44-4	bis(-2-Chloroethyl)Ether	30000U
95-57-8	2-Chlorophenol	80000U
541-73-1	1, 3-Dichlorobenzene	30000U
106-46-7	1, 4-Dichlorobenzene	30000U
100-51-6	Benzyl Alcohol	30000U
95-50-1	1, 2-Dichlorobenzene	30000U
95-48-7	2-Methylphenol	60000U
39638-32-9	bis(2-chloroisopropyl)Ether	30000U
106-44-5	4-Methylphenol	6000U
621-64-7	N-Nitroso-Di-n-Propylamine	30000U
67-72-1	Hexachloroethane	30000U
98-95-3	Nitrobenzene	30000U
78-59-1	Isophorone	30000U
88-75-5	2-Nitrophenol	60000U
105-67-9	2, 4-Dimethylphenol	60000U
65-85-0	Benzoic Acid	60000U
111-91-1	bis(-2-Chloroethoxy)Methane	30000U
120-83-2	2, 4-Dichlorophenol	60000U
120-82-1	1, 2, 4-Trichlorobenzene	30000U
91-20-3	Naphthalene	30000U
106-47-8	4-Chloroaniline	30000U
87-68-3	Hexachlorobutadiene	30000U
59-50-7	4-Chloro-3-Methylphenol	60000U
91-57-6	2-Methylnaphthalene	(TBN) ~~66~~ 30000U
77-47-4	Hexachlorocyclopentadiene	30000U
88-06-2	2, 4, 6-Trichlorophenol	60000U
95-95-4	2, 4, 5-Trichlorophenol	60000U
91-58-7	2-Chloronaphthalene	30000U
88-74-4	2-Nitroaniline	30000U
131-11-3	Dimethyl Phthalate	30000U
208-96-8	Acenaphthylene	30000U
99-09-2	3-Nitroaniline	30000U

CAS Number		ug/l or ug/Kg (Circle One)
83-32-9	Acenaphthene	30,000U
51-28-5	2, 4-Dinitrophenol	60000U
100-02-7	4-Nitrophenol	60000U
132-64-9	Dibenzofuran	30000U
121-14-2	2, 4-Dinitrotoluene	30000U
606-20-2	2, 6-Dinitrotoluene	30000U
84-66-2	Diethylphthalate	30000U
7005-72-3	4-Chlorophenyl-phenylether	30000U
86-73-7	Fluorene	30000U
100-01-6	4-Nitroaniline	30000U
534-52-1	4, 6-Dinitro-2-Methylphenol	60000U
86-30-6	N-Nitrosodiphenylamine (1)	30000U
101-55-3	4-Bromophenyl-phenylether	30000U
118-74-1	Hexachlorobenzene	30000U
87-86-5	Pentachlorophenol	60000U
85-01-8	Phenanthrene	30000U
120-12-7	Anthracene	30000U
84-74-2	Di-n-Butylphthalate	30000U
206-44-0	Fluoranthene	30000U
92-87-5	Benzidine	30000U
129-00-0	Pyrene	30000U
85-68-7	Butylbenzylphthalate	30000U
91-94-1	3, 3'-Dichlorobenzidine	30000U
56-55-3	Benzo(a)Anthracene	30000U
117-81-7	bis(2-Ethylhexyl)Phthalate	30000U
218-01-9	Chrysene	30000U
117-84-0	Di-n-Octyl Phthalate	30000U
205-99-2	Benzo(b)Fluoranthene	30000U
207-08-9	Benzo(k)Fluoranthene	30000U
50-32-8	Benzo(a)Pyrene	30000U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	30000U
53-70-3	Dibenz(a, h)Anthracene	30000U
191-24-2	Benzo(g, h, i)Perylene	30000U

(1)-Cannot be separated from diphenylamine

Laboratory Name: _____

Case No: 5507

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/12/86

Date Analyzed: 3/29/86

Conc/(Dil) Factor: 10

CAS Number		ug/l or ug/Kg (Circle One)
319-84-6	Alpha-BHC	35 U
319-85-7	Beta-BHC	35 U
319-86-8	Delta-BHC	130 U
58-89-9	Gamma-BHC (Lindane)	35 U
76-44-8	Heptachlor	70 U
309-00-2	Aldrin	70 U
1024-57-3	Heptachlor Epoxide	460 U
959-98-8	Endosulfan I	130 U
60-57-1	Dieldrin	140 U
72-55-9	4,4'-DDE	1100
72-20-8	Endrin	250 U
33213-65-9	Endosulfan II	140 U
72-54-8	4,4'-DDD	35 U
7421-93-4	Endrin Aldehyde	410 U
1031-07-8	Endosulfan Sulfate	370 U
50-29-3	4,4'-DDT	70 U
72-43-5	Methoxychlor	1100 U
53494-70-5	Endrin Ketone	1400 U
57-74-9	Chlordane	49000
8001-35-2	Toxaphene	4000 U
12674-11-2	Aroclor-1016	2100 U
11104-28-2	Aroclor-1221	1700 U
11141-16-5	Aroclor-1232	200 U
53469-21-9	Aroclor-1242	1500 U
12672-29-6	Aroclor-1248	1100 U
11097-69-1	Aroclor-1254	550 U
11096-82-5	Aroclor-1260	580 U

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s _____ or W_s 30.81 V_t 1000 V_i 3

Sample Number
BF592

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp.
Lab Sample ID No: L1497V
Sample Matrix: Soil
Data Release Authorized By: C. Dwyer

Case No: 5507
QC Report No: BV4406
Contract No: 68-01-6766, 6788, 6789, 679
Date Sample Received: 2/6/86

Volatile Compounds

Concentration: Low (Medium) (Circle One)
Date Extracted/Prepared: 2/14/86
Date Analyzed: 2/14/86
Conc/Dil Factor: 1 pH 6.9
Percent Moisture: (Not Decanted) 40.7

CAS Number		ug/l or ug/Kg (Circle One)
74-87-3	Chloromethane	6700 U
74-83-9	Bromomethane	6700 U
75-01-4	Vinyl Chloride	6700 U
75-00-3	Chloroethane	6700 U
75-09-2	Methylene Chloride 49,000	B ~~35,000 B~~
67-64-1	Acetone 92,000 B	~~51,000 B~~
75-15-0	Carbon Disulfide	6700 U
75-35-4	1, 1-Dichloroethene	6700 U
75-34-3	1, 1-Dichloroethane	6700 U
156-60-5	Trans-1, 2-Dichloroethene	6700 U
67-66-3	Chloroform	6700 U
107-06-2	1, 2-Dichloroethane	6700 U
78-93-3	2-Butanone	6700 U
71-55-6	1, 1, 1-Trichloroethane	6700 U
56-23-5	Carbon Tetrachloride	6700 U
108-05-4	Vinyl Acetate	6700 U
75-27-4	Bromodichloromethane	6700 U

CAS Number		ug/l or ug/Kg (Circle One)
78-87-5	1, 2-Dichloropropane	6700 U
10061-02-6	Trans-1, 3-Dichloropropene	6700 U
79-01-6	Trichloroethene	6700 U
124-48-1	Dibromochloromethane	6700 U
79-00-5	1, 1, 2-Trichloroethane	6700 U
71-43-2	Benzene	6700 U
10061-01-5	cis-1, 3-Dichloropropene	6700 U
110-75-8	2-Chloroethylvinylether	6700 U
75-25-2	Bromoform	6700 U
108-10-1	4-Methyl-2-Pentanone	6700 U
591-78-6	2-Hexanone	6700 U
127-18-4	Tetrachloroethene	3900
79-34-5	1, 1, 2, 2-Tetrachloroethane	6700 U
108-88-3	Toluene	92,000
108-90-7	Chlorobenzene	6700 U
100-41-4	Ethylbenzene	38,000
100-42-5	Styrene	33,000
	Total Xylenes	190,000

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of each flag must be explicit.

Blue — If the result is a value greater than or equal to the detection limit, report the value.

U — Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g. 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read U - Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample.

J — Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero (e.g. 10J). If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J.

C — This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS.

B — This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action.

Other — Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report.

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Laboratory Name: [illegible]

Case No: S 07

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: Low Medium (Circle One)

Date Extracted/Prepared: 2/25/86

Date Analyzed: 3/4/86

Conc/Dil Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	30000 U
108-95-2	Phenol	60000 U
62-53-3	Aniline	30000 U
111-44-4	bis(-2-Chloroethyl)Ether	30000 U
95-57-8	2-Chlorophenol	60000 U
541-73-1	1, 3-Dichlorobenzene	30000 U
106-46-7	1, 4-Dichlorobenzene	30000 U
100-51-6	Benzyl Alcohol	30000 U
95-50-1	1, 2-Dichlorobenzene	30000 U
95-48-7	2-Methylphenol	60000 U
39638-32-9	bis(2-chloroisopropyl)Ether	30000 U
106-44-5	4-Methylphenol	60000 U
621-64-7	N-Nitroso-Di-n-Propylamine	30000 U
67-72-1	Hexachloroethane	30000 U
98-95-3	Nitrobenzene	30000 U
78-59-1	Isophorone	30000 U
88-75-5	2-Nitrophenol	60000 U
105-67-9	2, 4-Dimethylphenol	60000 U
65-85-0	Benzoic Acid	60000 U
111-91-1	bis(-2-Chloroethoxy)Methane	30000 U
120-83-2	2, 4-Dichlorophenol	60000 U
120-82-1	1, 2, 4-Trichlorobenzene	30000 U
91-20-3	Naphthalene	30000 U
106-47-8	4-Chloroaniline	30000 U
87-68-3	Hexachlorobutadiene	30000 U
59-50-7	4-Chloro-3-Methylphenol	60000 U
91-57-6	2-Methylnaphthalene	30000 U
77-47-4	Hexachlorocyclopentadiene	30000 U
88-06-2	2, 4, 6-Trichlorophenol	60000 U
95-95-4	2, 4, 5-Trichlorophenol	60000 U
91-58-7	2-Chloronaphthalene	30000 U
88-74-4	2-Nitroaniline	30000 U
131-11-3	Dimethyl Phthalate	30000 U
208-96-8	Acenaphthylene	30000 U
99-09-2	3-Nitroaniline	30000 U

CAS Number		ug/l or ug/Kg (Circle One)
83-32-9	Acenaphthene	30000 U
51-28-5	2, 4-Dinitrophenol	60000 U
100-02-7	4-Nitrophenol	60000 U
132-64-9	Dibenzofuran	30000 U
121-14-2	2, 4-Dinitrotoluene	30000 U
606-20-2	2, 6-Dinitrotoluene	30000 U
84-66-2	Diethylphthalate	30000 U
7005-72-3	4-Chlorophenyl-phenylether	30000 U
86-73-7	Fluorene	30000 U
100-01-6	4-Nitroaniline	30000 U
534-52-1	4, 6-Dinitro-2-Methylphenol	60000 U
86-30-6	N-Nitrosodiphenylamine (1)	30000 U
101-55-3	4-Bromophenyl-phenylether	30000 U
118-74-1	Hexachlorobenzene	30000 U
87-86-5	Pentachlorophenol	60000 U
85-01-8	Phenanthrene	30000 U
120-12-7	Anthracene	30000 U
84-74-2	Di-n-Butylphthalate (BN)	30000 U
206-44-0	Fluoranthene	30000 U
92-87-5	Benzidine	30000 U
129-00-0	Pyrene	30000 U
85-68-7	Butylbenzylphthalate (BN)	30000 U
91-94-1	3, 3'-Dichlorobenzidine	30000 U
56-55-3	Benzo(a)Anthracene	30000 U
117-81-7	bis(2-Ethylhexyl)Phthalate	120000
218-01-9	Chrysene	30000 U
117-84-0	Di-n-Octyl Phthalate (BN)	30000 U
205-99-2	Benzo(b)Fluoranthene	30000 U
207-08-9	Benzo(k)Fluoranthene	30000 U
50-32-8	Benzo(a)Pyrene	30000 U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	30000 U
53-70-3	Dibenzo(a, h)Anthracene	30000 U
191-24-2	Benzo(g, h, i)Perylene	30000 U

(1)-Cannot be separated from diphenylamine

Case No: [illegible]

BF592

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/12/87

Date Analyzed: 3/29/87

Conc/(Dil) Factor: 10

CAS Number		ug/l or (ug/Kg) (Circle One)
319-84-6	Alpha-BHC	36U
319-85-7	Beta-BHC	36U
319-86-8	Delta-BHC	130U
58-89-9	Gamma-BHC (Lindane)	36U
76-44-8	Heptachlor	72U
309-00-2	Aldrin	72U
1024-57-3	Heptachlor Epoxide	470U
959-98-8	Endosulfan I	130U
60-57-1	Dieldrin	190U
72-55-9	4,4'-DDE	150U
72-20-8	Endrin	260U
33213-65-9	Endosulfan II	150U
72-54-8	4,4'-DDD	36U
7421-93-4	Endrin Aldehyde	420U
1031-07-8	Endosulfan Sulfate	900U
50-29-3	4,4'-DDT	72U
72-43-5	Methoxychlor	1100U
53494-70-5	Endrin Ketone	1500U
57-74-9	Chlordane	410U
8001-35-2	Toxaphene	4110U
12674-11-2	Aroclor-1016	>2000U
11104-28-2	Aroclor-1221	1800U
11141-16-5	Aroclor-1232	>10U
53469-21-9	Aroclor-1242	15000U
12672-29-6	Aroclor-1248	1100U
11097-69-1	Aroclor-1254	570U
11096-82-5	Aroclor-1260	600U

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s _____ or W_s 30.81 ; V_t 1000 V_i 3

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Form 1

1/85

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp. Case No: 5507

Lab Sample ID No: L1498V QC Report No: QV4400

Sample Matrix: Soil Contract No: 68-01-6766, 6788, 6789, 6790

Data Release Authorized By: C. Dwyer Date Sample Received: [illegible]

Volatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/13/86

Date Analyzed: 2/13/86

Conc/Dil Factor: 1 pH 7.1

Percent Moisture: (Not Decanted) 29.2

CAS Number		ug/l or ug/Kg (Circle One)	
74-87-3	Chloromethane	5.6 U	
74-83-9	Bromomethane	5.6 U	
75-01-4	Vinyl Chloride	5.6 U	
75-00-3	Chloroethane	5.6 U	
75-09-2	Methylene Chloride	120.8 B	CO
67-64-1	Acetone	180.8 B	CO
75-15-0	Carbon Disulfide	5.6 U	
75-35-4	1, 1-Dichloroethene	5.6 U	
75-34-3	1, 1-Dichloroethane	5.6 U	
156-60-5	Trans-1, 2-Dichloroethene	5.6 U	
67-66-3	Chloroform	5.6 U	
107-06-2	1, 2-Dichloroethane	5.6 U	
78-93-3	2-Butanone	110.8	CO
71-55-6	1, 1, 1-Trichloroethane	5.6 U	
56-23-5	Carbon Tetrachloride	5.6 U	
108-05-4	Vinyl Acetate	5.6 U	
75-27-4	Bromodichloromethane	5.6 U	

CAS Number		ug/l or ug/Kg (Circle One)	
78-87-5	1, 2-Dichloropropane	5.6 U	
10061-02-6	Trans-1, 3-Dichloropropene	5.6 U	
79-01-6	Trichloroethene	5.6 U	
124-48-1	Dibromochloromethane	5.6 U	
79-00-5	1, 1, 2-Trichloroethane	5.6 U	
71-43-2	Benzene	5.6 U	
10061-01-5	cis-1, 3-Dichloropropene	5.6 U	
110-75-8	2-Chloroethylvinylether	5.6 U	
75-25-2	Bromoform	5.6 U	
108-10-1	4-Methyl-2-Pentanone	5.6 U	
591-78-6	2-Hexanone	5.6 U	
127-18-4	Tetrachloroethene	5.6 U	
79-34-5	1, 1, 2, 2-Tetrachloroethane	5.6 U	
108-88-3	Toluene	50.5	CO
108-90-7	Chlorobenzene	5.6 U	
100-41-4	Ethylbenzene	17.8	CO
100-42-5	Styrene	12.8	CO
	Total Xylenes	74.8	CO

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of each flag must be explicit.

If the result is a value greater than or equal to the detection limit, report the value

U — Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g., 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read: U-Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample

J — Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero. (e.g., 10J). If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J.

C — This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS

B — This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action

Other — Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report

Case No: 250

Sample Number: BF593

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2-26-86

Date Analyzed: 3-5-86

Conc/Dil Factor: 1

Moisture (%) 29.2%

CAS Number		ug/l or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	820 U
108-95-2	Phenol	1600 U
62-53-3	Aniline	820 U
111-44-4	bis(-2-Chloroethyl)Ether	820 U
95-57-8	2-Chlorophenol	1600 U
541-73-1	1, 3-Dichlorobenzene	820 U
106-46-7	1, 4-Dichlorobenzene	820 U
100-51-6	Benzyl Alcohol	820 U
95-50-1	1, 2-Dichlorobenzene	820 U
95-48-7	2-Methylphenol	1600 U
39638-32-9	bis(2-chloroisopropyl)Ether	820 U
106-44-5	4-Methylphenol	1600 U
621-64-7	N-Nitroso-Di-n-Propylamine	820 U
67-72-1	Hexachloroethane	820 U
98-95-3	Nitrobenzene	820 U
78-59-1	Isophorone	820 U
88-75-5	2-Nitrophenol	1600 U
105-67-9	2, 4-Dimethylphenol	1600 U
65-85-0	Benzoic Acid	1600 U
111-91-1	bis(-2-Chloroethoxy)Methane	820 U
120-83-2	2, 4-Dichlorophenol	1600 U
120-82-1	1, 2, 4-Trichlorobenzene	220 J
91-20-3	Naphthalene	310 J
106-47-8	4-Chloroaniline	820 U
87-68-3	Hexachlorobutadiene	820 U
59-50-7	4-Chloro-3-Methylphenol	1600 U
91-57-6	2-Methylnaphthalene	120 J
77-47-4	Hexachlorocyclopentadiene	820 U
88-06-2	2, 4, 6-Trichlorophenol	1600 U
95-95-4	2, 4, 5-Trichlorophenol	1600 U
91-58-7	2-Chloronaphthalene	820 U
88-74-4	2-Nitroaniline	820 U
131-11-3	Dimethyl Phthalate	820 U
208-96-8	Acenaphthylene	820 U
99-09-2	3-Nitroaniline	820 U

CAS Number		ug/l or ug/Kg (Circle One)
83-32-9	Acenaphthene	820 U
51-28-5	2, 4-Dinitrophenol	1600 U
100-02-7	4-Nitrophenol	1600 U
132-64-9	Dibenzofuran	820 U
121-14-2	2, 4-Dinitrotoluene	820 U
606-20-2	2, 6-Dinitrotoluene	820 U
84-66-2	Diethylphthalate	820 U
7005-72-3	4-Chlorophenyl-phenylether	820 U
86-73-7	Fluorene	820 U
100-01-6	4-Nitroaniline	820 U
534-52-1	4, 6-Dinitro-2-Methylphenol	1600 U
86-30-6	N-Nitrosodiphenylamine (1)	820 U
101-55-3	4-Bromophenyl-phenylether	820 U
118-74-1	Hexachlorobenzene	820 U
87-86-5	Pentachlorophenol	1600 U
85-01-8	Phenanthrene	200 J
120-12-7	Anthracene	820 U
84-74-2	Di-n-Butylphthalate	150 J
206-44-0	Fluoranthene	310 J
92-87-5	Benzidine	820 U
129-00-0	Pyrene	300 J
85-68-7	Butylbenzylphthalate	600 J
91-94-1	3, 3'-Dichlorobenzidine	820 U
56-55-3	Benzo(a)Anthracene	820 U
117-81-7	bis(2-Ethylhexyl)Phthalate	3500 B
218-01-9	Chrysene	190 J
117-84-0	Di-n-Octyl Phthalate	820 U
205-99-2	Benzo(b)Fluoranthene	150 J
207-08-9	Benzo(k)Fluoranthene	270 J
50-32-8	Benzo(a)Pyrene	210 J
193-39-5	Indeno(1, 2, 3-cd)Pyrene	820 U
53-70-3	Dibenz(a, h)Anthracene	820 U
191-24-2	Benzo(g, h, i)Perylene	820 U

(1)-Cannot be separated from diphenylamine

Case No: 507

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/12/86

Date Analyzed: 3/29/86

Conc/Dil Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)
319-84-6	Alpha-BHC	2.9 U
319-85-7	Beta-BHC	2.9 U
319-86-8	Delta-BHC	10 U
58-89-9	Gamma-BHC (Lindane)	2.9 U
76-44-8	Heptachlor	5.8 U
309-00-2	Aldrin	5.8 U
1024-57-3	Heptachlor Epoxide	3.8 U
959-98-8	Endosulfan I	11 U
60-57-1	Dieldrin	15 U
72-55-9	4,4'-DDE	1300
72-20-8	Endrin	21 U
33213-65-9	Endosulfan II	12 U
72-54-8	4,4'-DDD	2.9 U
7421-93-4	Endrin Aldehyde	34 U
1031-07-8	Endosulfan Sulfate	72 U
50-29-3	4,4'-DDT	5.8 U
72-43-5	Methoxychlor	89 U
53494-70-5	Endrin Ketone	120 U
57-74-9	Chlordane	33 U
8001-35-2	Toxaphene	330 U
12674-11-2	Aroclor-1016	180 U
11104-28-2	Aroclor-1221	150 U
11141-16-5	Aroclor-1232	17 U
53469-21-9	Aroclor-1242	120 U
12672-29-6	Aroclor-1248	90 U
11097-69-1	Aroclor-1254	1900 ~~450~~
11096-82-5	Aroclor-1260	48 U

S 4/16/86

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s _____ or W_s .8U ; V_t 1000 V_i 3

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Sample Number
BF583

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp.
Case No: 5507
Lab Sample ID No: 1469V
QC Report No: OV4372
Sample Matrix: WATER
Contract No: 68-01-6766, 6788, 6789, 6790
Data Release Authorized By: C. Dwyer
Date Sample Received: 2/6/86

Volatile Compounds

Concentration: (Low) Medium (Circle One)
Date Extracted/Prepared: 02-08-86
Date Analyzed: 02-08-86
Conc/Dil Factor: 1 pH
Percent Moisture: (Not Decanted)

CAS Number		ug/l or ug/Kg (Circle One)
74-87-3	Chloromethane	4.0U
74-83-9	Bromomethane	4.0U
75-01-4	Vinyl Chloride	4.0U
75-00-3	Chloroethane	4.0U
75-09-2	Methylene Chloride	2.1BJ
67-64-1	Acetone	16B
75-15-0	Carbon Disulfide	4.0U
75-35-4	1, 1-Dichloroethene	4.0U
75-34-3	1, 1-Dichloroethane	4.0U
156-60-5	Trans-1, 2-Dichloroethene	4.0U
67-66-3	Chloroform	4.0U
107-06-2	1, 2-Dichloroethane	4.0U
78-93-3	2-Butanone	4.0U
71-55-6	1, 1, 1-Trichloroethane	4.0U
56-23-5	Carbon Tetrachloride	4.0U
108-05-4	Vinyl Acetate	4.0U
75-27-4	Bromodichloromethane	4.0U

CAS Number		ug/l or ug/Kg (Circle One)
78-87-5	1, 2-Dichloropropane	4.0U
10061-02-6	Trans-1, 3-Dichloropropene	4.0U
79-01-6	Trichloroethene	4.0U
124-48-1	Dibromochloromethane	4.0U
79-00-5	1, 1, 2-Trichloroethane	4.0U
71-43-2	Benzene	4.0U
10061-01-5	cis-1, 3-Dichloropropene	4.0U
110-75-8	2-Chloroethylvinylether	4.0U
75-25-2	Bromoform	4.0U
108-10-1	4-Methyl-2-Pentanone	4.0U
591-78-6	2-Hexanone	4.0U
127-18-4	Tetrachloroethene	4.0U
79-34-5	1, 1, 2, 2-Tetrachloroethane	4.0U
108-88-3	Toluene	4.0U
108-90-7	Chlorobenzene	4.0U
100-41-4	Ethylbenzene	4.0U
100-42-5	Styrene	4.0U
	Total Xylenes	1.4J

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used Additional flags or footnotes explaining results are encouraged However, the definition of each flag must be explicit.

Value If the result is a value greater than or equal to the detection limit, report the value

U Indicates compound was analyzed for but not detected Report the minimum detection limit for the sample with the U (e g 10U) based on necessary concentration/dilution action (This is not necessarily the instrument detection limit) The footnote should read U- Compound was analyzed for but not detected The number is the minimum attainable detection limit for the sample

J Indicates an estimated value This flag is used either when estimating a concentration for tentatively identified compounds where a 1 1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero (e g , 10J) If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J

C This flag applies to pesticide parameters where the identification has been confirmed by GC/MS Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS

B This flag is used when the analyte is found in the blank as well as a sample It indicates possible/probable blank contamination and warns the data user to take appropriate action

Other Other specific flags and footnotes may be required to properly define the results If used, they must be fully described and such description attached to the data summary report

Laboratory Name: ETC Corp.

Case No: 5507

Sample Number: BF583

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 2/11/86

Conc/Dil Factor: 1

CAS Number		(ug/l) or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	20U
108-95-2	Phenol	40U
62-53-3	Aniline	20U
111-44-4	bis(-2-Chloroethyl)Ether	20U
95-57-8	2-Chlorophenol	40U
541-73-1	1, 3-Dichlorobenzene	20U
106-46-7	1, 4-Dichlorobenzene	20U
100-51-6	Benzyl Alcohol	20U
95-50-1	1, 2-Dichlorobenzene	20U
95-48-7	2-Methylphenol	40U
39638-32-9	bis(2-chloroisopropyl)Ether	20U
106-44-5	4-Methylphenol	40U
621-64-7	N-Nitroso-Di-n-Propylamine	20U
67-72-1	Hexachloroethane	20U
98-95-3	Nitrobenzene	20U
78-59-1	Isophorone	20U
88-75-5	2-Nitrophenol	40U
105-67-9	2, 4-Dimethylphenol	40U
65-85-0	Benzoic Acid	40U
111-91-1	bis(-2-Chloroethoxy)Methane	20U
120-83-2	2, 4-Dichlorophenol	40U
120-82-1	1, 2, 4-Trichlorobenzene	20U
91-20-3	Naphthalene	20U
106-47-8	4-Chloroaniline	20U
87-68-3	Hexachlorobutadiene	20U
59-50-7	4-Chloro-3-Methylphenol	40U
91-57-6	2-Methylnaphthalene	20U
77-47-4	Hexachlorocyclopentadiene	20U
88-06-2	2, 4, 6-Trichlorophenol	40U
95-95-4	2, 4, 5-Trichlorophenol	40U
91-58-7	2-Chloronaphthalene	20U
88-74-4	2-Nitroaniline	20U
131-11-3	Dimethyl Phthalate	20U
208-96-8	Acenaphthylene	20U
99-09-2	3-Nitroaniline	20U

CAS Number		(ug/l) or ug/Kg (Circle One)
83-32-9	Acenaphthene	20U
51-28-5	2, 4-Dinitrophenol	40U
100-02-7	4-Nitrophenol	40U
132-64-9	Dibenzofuran	20U
121-14-2	2, 4-Dinitrotoluene	20U
606-20-2	2, 6-Dinitrotoluene	20U
84-66-2	Diethylphthalate	20U
7005-72-3	4-Chlorophenyl-phenylether	20U
86-73-7	Fluorene	20U
100-01-6	4-Nitroaniline	20U
534-52-1	4, 6-Dinitro-2-Methylphenol	40U
86-30-6	N-Nitrosodiphenylamine (1)	20U
101-55-3	4-Bromophenyl-phenylether	20U
118-74-1	Hexachlorobenzene	20U
87-86-5	Pentachlorophenol	40U
85-01-8	Phenanthrene	20U
120-12-7	Anthracene	20U
84-74-2	Di-n-Butylphthalate	20U
206-44-0	Fluoranthene	20U
92-87-5	Benzidine	20U
129-00-0	Pyrene	20U
85-68-7	Butylbenzylphthalate	20U
91-94-1	3, 3'-Dichlorobenzidine	20U
56-55-3	Benzo(a)Anthracene	20U
117-81-7	bis(2-Ethylhexyl)Phthalate	20U
218-01-9	Chrysene	20U
117-84-0	Di-n-Octyl Phthalate	20U
205-99-2	Benzo(b)Fluoranthene	20U
207-08-9	Benzo(k)Fluoranthene	20U
50-32-8	Benzo(a)Pyrene	20U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	20U
53-70-3	Dibenz(a, h)Anthracene	20U
191-24-2	Benzo(g, h, i)Perylene	20U

(1)-Cannot be separated from diphenylamine

Laboratory
Case No: 5507

Sample Number
BF583

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 3/26/86

Conc/(Dil) Factor: 1

CAS Number		(ug/l) or ug/Kg (Circle One)
319-84-6	Alpha-BHC	0.017 u
319-85-7	Beta-BHC	0.017 u
319-86-8	Delta-BHC	0.062 u
58-89-9	Gamma-BHC (Lindane)	0.017 u
76-44-8	Heptachlor	0.035 u
309-00-2	Aldrin	0.035 u
1024-57-3	Heptachlor Epoxide	0.23 u
959-98-8	Endosulfan I	0.063 u
60-57-1	Dieldrin	0.090 u
72-55-9	4,4'-DDE	0.070 u
72-20-8	Endrin	0.12 u
33213-65-9	Endosulfan II	0.070 u
72-54-8	4,4'-DDD	0.017 u
7421-93-4	Endrin Aldehyde	0.20 u
1031-07-8	Endosulfan Sulfate	0.43 u
50-29-3	4,4'-DDT	0.035 u
72-43-5	Methoxychlor	0.53 u
53494-70-5	Endrin Ketone	0.70 u
57-74-9	Chlordane	0.20 u
8001-35-2	Toxaphene	2.0 u
12674-11-2	Aroclor-1016	1.1 u
11104-28-2	Aroclor-1221	0.87 u
11141-16-5	Aroclor-1232	0.10 u
53469-21-9	Aroclor-1242	0.73 u
12672-29-6	Aroclor-1248	0.53 u
11097-69-1	Aroclor-1254	0.27 u
11096-82-5	Aroclor-1260	0.29 u

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 1000 or W_s _____ V_t 10,000 V_i 3

Sample Number
BF584

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp.
Case No: 5507
Lab Sample ID No: L1491V
QC Report No: OV4372
Sample Matrix: WATER
Contract No: 68-01-6766, 6788, 6789, 6790
Data Release Authorized By: C. Dunya
Date Sample Received: 2/6/86

Volatile Compounds

Concentration: (Low) Medium (Circle One)
Date Extracted/Prepared: 2-8-86
Date Analyzed: 2-8-86
Conc/Dil Factor: 1 pH
Percent Moisture: (Not Decanted)

CAS Number		ug/l or ug/Kg (Circle One)
74-87-3	Chloromethane	4.0U
74-83-9	Bromomethane	4.0U
75-01-4	Vinyl Chloride	4.0U
75-00-3	Chloroethane	4.0U
75-09-2	Methylene Chloride	6.2B
67-64-1	Acetone	30 B
75-15-0	Carbon Disulfide	4.0U
75-35-4	1, 1-Dichloroethene	4.0U
75-34-3	1, 1-Dichloroethane	4.0U
156-60-5	Trans-1, 2-Dichloroethene	4.0U
67-66-3	Chloroform	4.0U
107-06-2	1, 2-Dichloroethane	4.0U
78-93-3	2-Butanone	4.0U
71-55-6	1, 1, 1-Trichloroethane	4.0U
56-23-5	Carbon Tetrachloride	4.0U
108-05-4	Vinyl Acetate	4.0U
75-27-4	Bromodichloromethane	4.0U

CAS Number		ug/l or ug/Kg (Circle One)
78-87-5	1, 2-Dichloropropane	4.0U
10061-02-6	Trans-1, 3-Dichloropropene	4.0U
79-01-6	Trichloroethene	4.0U
124-48-1	Dibromochloromethane	4.0U
79-00-5	1, 1, 2-Trichloroethane	4.0U
71-43-2	Benzene	4.0U
10061-01-5	cis-1, 3-Dichloropropene	4.0U
110-75-8	2-Chloroethylvinylether	4.0U
75-25-2	Bromoform	4.0U
108-10-1	4-Methyl-2-Pentanone	17.0
591-78-6	2-Hexanone	6.3
127-18-4	Tetrachloroethene	4.0U
79-34-5	1, 1, 2, 2-Tetrachloroethane	4.0U
108-88-3	Toluene	4.0U
108-90-7	Chlorobenzene	4.0U
100-41-4	Ethylbenzene	2.5J
100-42-5	Styrene	4.0U
	Total Xylenes	2.3J

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of each flag must be explicit.

[value]	If the result is a value greater than or equal to the detection limit, report the value
U	Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g., 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read: U-Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample
J	Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero (e.g., 10J). If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J
C	This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS
B	This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action
Other	Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report

Laboratory Name: ETC Corp.

Case No: 5507

Sample Number: BF586

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 2/11/86

Conc/Dil Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	20U
108-95-2	Phenol	40U
62-53-3	Aniline	20U
111-44-4	bis(-2-Chloroethyl)Ether	20U
95-57-8	2-Chlorophenol	40U
541-73-1	1, 3-Dichlorobenzene	20U
106-46-7	1, 4-Dichlorobenzene	20U
100-51-6	Benzyl Alcohol	20U
95-50-1	1, 2-Dichlorobenzene	20U
95-48-7	2-Methylphenol	40U
39638-32-9	bis(2-chloroisopropyl)Ether	20U
106-44-5	4-Methylphenol	40U
621-64-7	N-Nitroso-Di-n-Propylamine	20U
67-72-1	Hexachloroethane	20U
98-95-3	Nitrobenzene	20U
78-59-1	Isophorone	20U
88-75-5	2-Nitrophenol	40U
105-67-9	2, 4-Dimethylphenol	40U
65-85-0	Benzoic Acid	40U
111-91-1	bis(-2-Chloroethoxy)Methane	20U
120-83-2	2, 4-Dichlorophenol	40U
120-82-1	1, 2, 4-Trichlorobenzene	20U
91-20-3	Naphthalene	20U
106-47-8	4-Chloroaniline	20U
87-68-3	Hexachlorobutadiene	20U
59-50-7	4-Chloro-3-Methylphenol	40U
91-57-6	2-Methylnaphthalene	20U
77-47-4	Hexachlorocyclopentadiene	20U
88-06-2	2, 4, 6-Trichlorophenol	40U
95-95-4	2, 4, 5-Trichlorophenol	40U
91-58-7	2-Chloronaphthalene	20U
88-74-4	2-Nitroaniline	20U
131-11-3	Dimethyl Phthalate	20U
208-96-8	Acenaphthylene	20U
99-09-2	3-Nitroaniline	20U

CAS Number		ug/l or ug/ (Circle O
83-32-9	Acenaphthene	20
51-28-5	2, 4-Dinitrophenol	40
100-02-7	4-Nitrophenol	40
132-64-9	Dibenzofuran	20
121-14-2	2, 4-Dinitrotoluene	20
606-20-2	2, 6-Dinitrotoluene	20U
84-66-2	Diethylphthalate	20U
7005-72-3	4-Chlorophenyl-phenylether	20U
86-73-7	Fluorene	20U
100-01-6	4-Nitroaniline	20U
534-52-1	4, 6-Dinitro-2-Methylphenol	40U
86-30-6	N-Nitrosodiphenylamine (1)	20U
101-55-3	4-Bromophenyl-phenylether	20U
118-74-1	Hexachlorobenzene	20U
87-86-5	Pentachlorophenol	40U
85-01-8	Phenanthrene	20U
120-12-7	Anthracene	20U
84-74-2	Di-n-Butylphthalate	20U
206-44-0	Fluoranthene	20U
92-87-5	Benzidine	20U
129-00-0	Pyrene	20U
85-68-7	Butylbenzylphthalate	20U
91-94-1	3, 3'-Dichlorobenzidine	20U
56-55-3	Benzo(a)Anthracene	20U
117-81-7	bis(2-Ethylhexyl)Phthalate	20U
218-01-9	Chrysene	20U
117-84-0	Di-n-Octyl Phthalate	20U
205-99-2	Benzo(b)Fluoranthene	20U
207-08-9	Benzo(k)Fluoranthene	20U
50-32-8	Benzo(a)Pyrene	20U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	20U
53-70-3	Dibenz(a, h)Anthracene	20U
191-24-2	Benzo(g, h, i)Perylene	20U

(1)-Cannot be separated from diphenylamine

Laboratory Name: ETC Corp.

Case No: 5507

Sample Number: BF584

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 3/26/86

Conc/(Dil) Factor: 1

CAS Number		(ug/l) or ug/Kg (Circle One)	
319-84-6	Alpha-BHC	0.017	u
319-85-7	Beta-BHC	0.017	u
319-86-8	Delta-BHC	0.062	u
58-89-9	Gamma-BHC (Lindane)	0.017	u
76-44-8	Heptachlor	0.035	u
309-00-2	Aldrin	0.035	u
1024-57-3	Heptachlor Epoxide	0.23	u
959-98-8	Endosulfan I	0.063	u
60-57-1	Dieldrin	0.090	u
72-55-9	4,4'-DDE	0.070	u
72-20-8	Endrin	0.12	u
33213-65-9	Endosulfan II	0.070	u
72-54-8	4,4'-DDD	0.017	u
7421-93-4	Endrin Aldehyde	0.20	u
1031-07-8	Endosulfan Sulfate	0.43	u
50-29-3	4,4'-DDT	0.035	u
72-43-5	Methoxychlor	0.53	u
53494-70-5	Endrin Ketone	0.70	u
57-74-9	Chlordane	0.20	u
8001-35-2	Toxaphene	2.0	u
12674-11-2	Aroclor-1016	1.1	u
11104-28-2	Aroclor-1221	0.87	u
11141-16-5	Aroclor-1232	0.10	u
53469-21-9	Aroclor-1242	0.73	u
12672-29-6	Aroclor-1248	0.53	u
11097-69-1	Aroclor-1254	0.27	u
11096-82-5	Aroclor-1260	0.29	u

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 1000 or W_s _____ ; V_t 10,000 V_i 3

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp. Case No: 550

Lab Sample ID No: L1492V QC Report No: ENV

Sample Matrix: WATER Contract No: 68-01-6766

Data Release Authorized By: R.F. Smith Date Sample Received: 2

Volatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2-5-96

Date Analyzed: 2-7-96

Conc/Dil Factor: 1 pH

Percent Moisture: (Not Decanted)

CAS Number		ug/l or ug/Kg (Circle One)
74-87-3	Chloromethane	4.0U
74-83-9	Bromomethane	4.0U
75-01-4	Vinyl Chloride	4.0U
75-00-3	Chloroethane	4.0U
75-09-2	Methylene Chloride	115
67-64-1	Acetone	26B
75-15-0	Carbon Disulfide	4.0U
75-35-4	1, 1-Dichloroethene	4.0U
75-34-3	1, 1-Dichloroethane	4.0U
156-60-5	Trans-1, 2-Dichloroethene	4.0U
67-66-3	Chloroform	4.0U
107-06-2	1, 2-Dichloroethane	4.0U
78-93-3	2-Butanone	4.0U
71-55-6	1, 1, 1-Trichloroethane	4.0U
56-23-5	Carbon Tetrachloride	4.0U
108-05-4	Vinyl Acetate	4.0U
75-27-4	Bromodichloromethane	4.0U

CAS Number		ug/l or ug/Kg (Circle One)
78-87-5	1, 2-Dichloropropane	4.0U
10061-02-6	Trans-1, 3-Dichloropropene	4.0U
79-01-6	Trichloroethene	4.0U
124-48-1	Dibromochloromethane	4.0U
79-00-5	1, 1, 2-Trichloroethane	4.0U
71-43-2	Benzene	4.0U
10061-01-5	cis-1, 3-Dichloropropene	4.0U
110-75-8	2-Chloroethylvinylether	4.0U
75-25-2	Bromoform	4.0U
108-10-1	4-Methyl-2-Pentanone	4.0U
591-78-6	2-Hexanone	4.0U
127-18-4	Tetrachloroethene	4.0U
79-34-5	1, 1, 2, 2-Tetrachloroethane	2.2J
108-88-3	Toluene	1.5J
108-90-7	Chlorobenzene	4.0U
100-41-4	Ethylbenzene	4.0U
100-42-5	Styrene	4.0U
	Total Xylenes	2.1J

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of each flag must be explicit.

Value — If the result is a value greater than or equal to the detection limit, report the value.

U — Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g. 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read U - Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample.

J — Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero (e.g., 10J). If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J.

C — This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS.

B — This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action.

Other — Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report.

Laboratory Name: ETC Corp.

Case No: 5507

Sample Number: BA85

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 2/11/86

Conc/Dil Factor: 1

CAS Number		(ug/l) or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	20U
108-95-2	Phenol	40U
62-53-3	Aniline	20U
111-44-4	bis(-2-Chloroethyl)Ether	20U
95-57-8	2-Chlorophenol	40U
541-73-1	1, 3-Dichlorobenzene	20U
106-46-7	1, 4-Dichlorobenzene	20U
100-51-6	Benzyl Alcohol	20U
95-50-1	1, 2-Dichlorobenzene	20U
95-48-7	2-Methylphenol	40U
39638-32-9	bis(2-chloroisopropyl)Ether	20U
106-44-5	4-Methylphenol	40U
621-64-7	N-Nitroso-Di-n-Propylamine	20U
67-72-1	Hexachloroethane	20U
98-95-3	Nitrobenzene	20U
78-59-1	Isophorone	20U
88-75-5	2-Nitrophenol	40U
105-67-9	2, 4-Dimethylphenol	40U
65-85-0	Benzoic Acid	40U
111-91-1	bis(-2-Chloroethoxy)Methane	20U
120-83-2	2, 4-Dichlorophenol	40U
120-82-1	1, 2, 4-Trichlorobenzene	20U
91-20-3	Naphthalene	20U
106-47-8	4-Chloroaniline	20U
87-68-3	Hexachlorobutadiene	20U
59-50-7	4-Chloro-3-Methylphenol	40U
91-57-6	2-Methylnaphthalene	20U
77-47-4	Hexachlorocyclopentadiene	20U
88-06-2	2, 4, 6-Trichlorophenol	40U
95-95-4	2, 4, 5-Trichlorophenol	40U
91-58-7	2-Chloronaphthalene	20U
88-74-4	2-Nitroaniline	20U
131-11-3	Dimethyl Phthalate	20U
208-96-8	Acenaphthylene	20U
99-09-2	3-Nitroaniline	20U

CAS Number		(ug/l) or ug/Kg (Circle One)
83-32-9	Acenaphthene	20U
51-28-5	2, 4-Dinitrophenol	40U
100-02-7	4-Nitrophenol	40U
132-64-9	Dibenzofuran	20U
121-14-2	2, 4-Dinitrotoluene	20U
606-20-2	2, 6-Dinitrotoluene	20U
84-66-2	Diethylphthalate	20U
7005-72-3	4-Chlorophenyl-phenylether	20U
86-73-7	Fluorene	20U
100-01-6	4-Nitroaniline	20U
534-52-1	4, 6-Dinitro-2-Methylphenol	40U
86-30-6	N-Nitrosodiphenylamine (1)	20U
101-55-3	4-Bromophenyl-phenylether	20U
118-74-1	Hexachlorobenzene	20U
87-86-5	Pentachlorophenol	40U
85-01-8	Phenanthrene	20U
120-12-7	Anthracene	20U
84-74-2	Di-n-Butylphthalate	20U
206-44-0	Fluoranthene	20U
92-87-5	Benzidine	20U
129-00-0	Pyrene	20U
85-68-7	Butylbenzylphthalate	20U
91-94-1	3, 3'-Dichlorobenzidine	20U
56-55-3	Benzo(a)Anthracene	20U
117-81-7	bis(2-Ethylhexyl)Phthalate	20U
218-01-9	Chrysene	20U
117-84-0	Di-n-Octyl Phthalate	20U
205-99-2	Benzo(b)Fluoranthene	20U
207-08-9	Benzo(k)Fluoranthene	20U
50-32-8	Benzo(a)Pyrene	20U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	20U
53-70-3	Dibenz(a, h)Anthracene	20U
191-24-2	Benzo(g, h, i)Perylene	20U

(1)-Cannot be separated from diphenylamine

Laboratory Name: _____

Case No: 5507

Organics Analysis Data Sheet
(Page 3)

Pesticides/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/[illegible]/86

Date Analyzed: 3/26/86

Conc/(Dil) Factor: 1

CAS Number		(ug/l) or ug/Kg (Circle One)	
319-84-6	Alpha-BHC	[illegible]	u
319-85-7	Beta-BHC	[illegible]	u
319-86-8	Delta-BHC	[illegible]	u
58-89-9	Gamma-BHC (Lindane)	[illegible]	u
76-44-8	Heptachlor	0.035	u
309-00-2	Aldrin	0.035	u
1024-57-3	Heptachlor Epoxide	0.23	u
959-98-8	Endosulfan I	0.063	u
60-57-1	Dieldrin	0.090	u
72-55-9	4,4'-DDE	0.070	u
72-20-8	Endrin	0.12	u
33213-65-9	Endosulfan II	0.070	u
72-54-8	4,4'-DDD	0.017	u
7421-93-4	Endrin Aldehyde	0.20	u
1031-07-8	Endosulfan Sulfate	0.43	u
50-29-3	4,4'-DDT	0.035	u
72-43-5	Methoxychlor	0.53	u
53494-70-5	Endrin Ketone	0.70	u
57-74-9	Chlordane	0.20	u
8001-35-2	Toxaphene	2.0	u
12674-11-2	Aroclor-1016	1.1	u
11104-28-2	Aroclor-1221	0.97	u
11141-16-5	Aroclor-1232	0.10	u
53469-21-9	Aroclor-1242	0.73	u
12672-29-6	Aroclor-1248	0.53	u
11097-69-1	Aroclor-1254	0.27	u
11096-82-5	Aroclor-1260	0.29	u

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 1000 or W_s _____ ; V_t 10,000 V_i 3

Sample Number
BF 589

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp.
Lab Sample ID No: L1493
Sample Matrix: WATER
Data Release Authorized By: C. Dwyer

Case No: 1507
QC Report No: OV4372
Contract No: 68-01-6766, 6788, 6789, 67
Date Sample Received: 2/6/86

Volatile Compounds

Concentration: (Low) Medium (Circle One)
Date Extracted/Prepared: 2-8-86
Date Analyzed: 2-8-86
Conc/Dil Factor: 1 pH
Percent Moisture: (Not Decanted)

CAS Number		ug/l or ug/Kg (Circle One)
74-87-3	Chloromethane	4.0U
74-83-9	Bromomethane	4.0U
75-01-4	Vinyl Chloride	4.0U
75-00-3	Chloroethane	4.0U
75-09-2	Methylene Chloride	38
67-64-1	Acetone	2088B
75-15-0	Carbon Disulfide	4.0U
75-35-4	1, 1-Dichloroethene	2.4J
75-34-3	1, 1-Dichloroethane	4.0U
156-60-5	Trans-1, 2-Dichloroethene	4.0U
67-66-3	Chloroform	4.0U
107-06-2	1, 2-Dichloroethane	4.0U
78-93-3	2-Butanone	3872
71-55-6	1, 1, 1-Trichloroethane	3.6J
56-23-5	Carbon Tetrachloride	4.0U
108-05-4	Vinyl Acetate	4.0U
75-27-4	Bromodichloromethane	4.0U

CAS Number		ug/l or ug/Kg (Circle One)
78-87-5	1, 2-Dichloropropane	4.0U
10061-02-6	Trans-1, 3-Dichloropropene	4.0U
79-01-6	Trichloroethene	4.0U
124-48-1	Dibromochloromethane	4.0U
79-00-5	1, 1, 2-Trichloroethane	4.0U
71-43-2	Benzene	4.0U
10061-01-5	cis-1, 3-Dichloropropene	4.0U
110-75-8	2-Chloroethylvinylether	4.0U
75-25-2	Bromoform	2.4J
108-10-1	4-Methyl-2-Pentanone	100
591-78-6	2-Hexanone	6.3
127-18-4	Tetrachloroethene	4.0U
79-34-5	1, 1, 2, 2-Tetrachloroethane	5.9
108-88-3	Toluene	46
108-90-7	Chlorobenzene	4.0U
100-41-4	Ethylbenzene	6.1
100-42-5	Styrene	4.0U
	Total Xylenes	32

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of each flag must be explicit.

Value	If the result is a value greater than or equal to the detection limit, report the value
U	Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g., 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read: U-Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample
J	Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero (e.g., 10J). If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J
C	This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS
B	This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action
Other	Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report

Case No: 5527

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 2/12/86

Conc/Dil Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)
62-75-9	N-Nitrosodimethylamine	20U
108-95-2	Phenol	40U
62-53-3	Aniline	20U
111-44-4	bis(-2-Chloroethyl)Ether	20U
95-57-8	2-Chlorophenol	20U
541-73-1	1, 3-Dichlorobenzene	40U
106-46-7	1, 4-Dichlorobenzene	20U
100-51-6	Benzyl Alcohol	20U
95-50-1	1, 2-Dichlorobenzene	20U
95-48-7	2-Methylphenol	20U
39638-32-9	bis(2-chloroisopropyl)Ether	40U
106-44-5	4-Methylphenol	20U
621-64-7	N-Nitroso-Di-n-Propylamine	40U
67-72-1	Hexachloroethane	20U
98-95-3	Nitrobenzene	20U
78-59-1	Isophorone	20U
88-75-5	2-Nitrophenol	20U
105-67-9	2, 4-Dimethylphenol	40U
65-85-0	Benzoic Acid	40U
111-91-1	bis(-2-Chloroethoxy)Methane	40U
120-83-2	2, 4-Dichlorophenol	20U
120-82-1	1, 2, 4-Trichlorobenzene	40U
91-20-3	Naphthalene	20U
106-47-8	4-Chloroaniline	20U
87-68-3	Hexachlorobutadiene	20U
59-50-7	4-Chloro-3-Methylphenol	20U
91-57-6	2-Methylnaphthalene	40U
77-47-4	Hexachlorocyclopentadiene	20U
88-06-2	2, 4, 6-Trichlorophenol	20U
95-95-4	2, 4, 5-Trichlorophenol	40U
91-58-7	2-Chloronaphthalene	40U
88-74-4	2-Nitroaniline	20U
131-11-3	Dimethyl Phthalate	20U
208-96-8	Acenaphthylene	20U
99-09-2	3-Nitroaniline	20U

CAS Number		ug/l or ug/Kg (Circle One)
83-32-9	Acenaphthene	20U
51-28-5	2, 4-Dinitrophenol	40U
100-02-7	4-Nitrophenol	40U
132-64-9	Dibenzofuran	20U
121-14-2	2, 4-Dinitrotoluene	20U
606-20-2	2, 6-Dinitrotoluene	20U
84-66-2	Diethylphthalate	20U
7005-72-3	4-Chlorophenyl-phenylether	20U
86-73-7	Fluorene	20U
100-01-6	4-Nitroaniline	20U
534-52-1	4, 6-Dinitro-2-methylphenol	40U
86-30-6	N-Nitrosodiphenylamine (1)	20U
101-55-3	4-Bromophenyl-phenylether	20U
118-74-1	Hexachlorobenzene	20U
87-86-5	Pentachlorophenol	40U
85-01-8	Phenanthrene	20U
120-12-7	Anthracene	20U
84-74-2	Di-n-Butylphthalate	20U
206-44-0	Fluoranthene	20U
92-87-5	Benzidine	20U
129-00-0	Pyrene	20U
85-68-7	Butylbenzylphthalate	20U
91-94-1	3, 3'-Dichlorobenzidine	20U
56-55-3	Benzo(a)Anthracene	20U
117-81-7	bis(2-Ethylhexyl)Phthalate	20U
218-01-9	Chrysene	20U
117-84-0	Di-n-Octyl Phthalate	20U
205-99-2	Benzo(b)Fluoranthene	20U
207-08-9	Benzo(k)Fluoranthene	20U
50-32-8	Benzo(a)Pyrene	20U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	20U
53-70-3	Dibenz(a, h)Anthracene	20U
191-24-2	Benzo(g, h, i)Perylene	20U

(1)-Cannot be separated from diphenylamine

Laboratory Name: ETC Corp.-

Case No: 5507

Sample Number: BF589

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCBs

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 3/26/86

Conc/(Dil) Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)
319-84-6	Alpha-BHC	0.020 U
319-85-7	Beta-BHC	0.089 U
319-86-8	Delta-BHC	0.072 U
58-89-9	Gamma-BHC (Lindane)	0.020 U
76-44-8	Heptachlor	0.040 U
309-00-2	Aldrin	0.040 U
1024-57-3	Heptachlor Epoxide	0.26 U
959-98-8	Endosulfan I	0.073 U
60-57-1	Dieldrin	0.10 U
72-55-9	4,4'-DDE	~~0.80~~ 0.080 U 5x12
72-20-8	Endrin	0.14 U
33213-65-9	Endosulfan II	~~0.80~~ 0.080 U 5x12
72-54-8	4,4'-DDD	0.020 U
7421-93-4	Endrin Aldehyde	0.23 U
1031-07-8	Endosulfan Sulfate	0.49 U
50-29-3	4,4'-DDT	0.040 U
72-43-5	Methoxychlor	0.61 U
53494-70-5	Endrin Ketone	0.80 U
57-74-9	Chlordane	0.23 U
8001-35-2	Toxaphene	2.3 U
12674-11-2	Aroclor-1016	1.2 U
11104-28-2	Aroclor-1221	1.0 U
11141-16-5	Aroclor-1232	0.11 U
53469-21-9	Aroclor-1242	0.84 U
12672-29-6	Aroclor-1248	0.61 U
11097-69-1	Aroclor-1254	0.31 U
11096-82-5	Aroclor-1260	0.33 U

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 870 or W_s _____ ; V_t 10,000 V_i 3

Organics Analysis Data Sheet
(Page 1)

Laboratory Name: ETC Corp.

Lab Sample ID No: L 1496 V

Sample Matrix: WATER

Data Release Authorized By: R. Dugan

Case No: 5507

QC Report No:

Contract No: 68-01-6786

Date Sample Received:

Volatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2-8-86

Date Analyzed: 2-8-86

Conc/Dil Factor: 1 pH

Percent Moisture: (Not Decanted)

CAS Number		ug/l or ug/Kg (Circle One)
74-87-3	Chloromethane	4.0U
74-83-9	Bromomethane	4.0U
75-01-4	Vinyl Chloride	4.0U
75-00-3	Chloroethane	4.0U
75-09-2	Methylene Chloride	12
67-64-1	Acetone	44B
75-15-0	Carbon Disulfide	4.0U
75-35-4	1, 1-Dichloroethene	4.0U
75-34-3	1, 1-Dichloroethane	4.0U
156-60-5	Trans-1, 2-Dichloroethene	4.0U
67-66-3	Chloroform	4.0U
107-06-2	1, 2-Dichloroethane	4.0U
78-93-3	2-Butanone	220
71-55-6	1, 1, 1-Trichloroethane	4.0U
56-23-5	Carbon Tetrachloride	4.0U
108-05-4	Vinyl Acetate	4.0U
75-27-4	Bromodichloromethane	4.0U

CAS Number		ug/l or ug/Kg (Circle One)
78-87-5	1, 2-Dichloropropane	4.0U
10061-02-6	Trans-1, 3-Dichloropropene	4.0U
79-01-6	Trichloroethene	4.0U
124-48-1	Dibromochloromethane	4.0U
79-00-5	1, 1, 2-Trichloroethane	4.0U
71-43-2	Benzene	4.0U
10061-01-5	cis-1, 3-Dichloropropene	4.0U
110-75-8	2-Chloroethylvinylether	4.0U
75-25-2	Bromoform	4.0U
108-10-1	4-Methyl-2-Pentanone	4.0U
591-78-6	2-Hexanone	4.0U
127-18-4	Tetrachloroethene	4.0U
79-34-5	1, 1, 2, 2-Tetrachloroethane	4.0U
108-88-3	Toluene	4.0U
108-90-7	Chlorobenzene	4.0U
100-41-4	Ethylbenzene	4.0U
100-42-5	Styrene	4.0U
	Total Xylenes	4.0U

Data Reporting Qualifiers

For reporting results to EPA, the following results qualifiers are used. Additional flags or footnotes explaining results are encouraged. However, the definition of each flag must be explicit.

[illegible]	If the result is a value greater than or equal to the detection limit, report the value
U	Indicates compound was analyzed for but not detected. Report the minimum detection limit for the sample with the U (e.g. 10U) based on necessary concentration/dilution action. (This is not necessarily the instrument detection limit.) The footnote should read U - Compound was analyzed for but not detected. The number is the minimum attainable detection limit for the sample
J	Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed or when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit but greater than zero (e.g. 10J). If limit of detection is 10 µg/l and a concentration of 3 µg/l is calculated, report as 3J
C	This flag applies to pesticide parameters where the identification has been confirmed by GC/MS. Single component pesticides ≥10 ng/ul in the final extract should be confirmed by GC/MS
B	This flag is used when the analyte is found in the blank as well as a sample. It indicates possible/probable blank contamination and warns the data user to take appropriate action
Other	Other specific flags and footnotes may be required to properly define the results. If used, they must be fully described and such description attached to the data summary report

Laboratory Name: ETC Corp.

Case No: 5507

Sample Number: BF59U

Organics Analysis Data Sheet
(Page 2)

Semivolatile Compounds

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 2/10/86

Date Analyzed: 2/12/86

Conc/Dil Factor: 1

CAS Number		ug/l or ug/Kg (Circle One)	
62-75-9	N-Nitrosodimethylamine	20U	
108-95-2	Phenol	8.7J ~~40U~~	NJ
62-53-3	Aniline	20U	
111-44-4	bis(-2-Chloroethyl)Ether	20U	
95-57-8	2-Chlorophenol	40U	
541-73-1	1, 3-Dichlorobenzene	20U	
106-46-7	1, 4-Dichlorobenzene	20U	
100-51-6	Benzyl Alcohol	20U	
95-50-1	1, 2-Dichlorobenzene	20U	
95-48-7	2-Methylphenol	40U	
39638-32-9	bis(2-chloroisopropyl)Ether	20U	
106-44-5	4-Methylphenol	20J ~~40U~~	NJ
621-64-7	N-Nitroso-Di-n-Propylamine	20U	
67-72-1	Hexachloroethane	20U	
98-95-3	Nitrobenzene	20U	
78-59-1	Isophorone	340 ~~20U~~	ND
88-75-5	2-Nitrophenol	40U	
105-67-9	2, 4-Dimethylphenol	40U	
65-85-0	Benzoic Acid	35J ~~40U~~	LD
111-91-1	bis(-2-Chloroethoxy)Methane	20U	
120-83-2	2, 4-Dichlorophenol	40U	
120-82-1	1, 2, 4-Trichlorobenzene	20U	
91-20-3	Naphthalene	20U	
106-47-8	4-Chloroaniline	20U	
87-68-3	Hexachlorobutadiene	20U	
59-50-7	4-Chloro-3-Methylphenol	40U	
91-57-6	2-Methylnaphthalene	17J ~~20U~~	NA
77-47-4	Hexachlorocyclopentadiene	20U	
88-06-2	2, 4, 6-Trichlorophenol	40U	
95-95-4	2, 4, 5-Trichlorophenol	40U	
91-58-7	2-Chloronaphthalene	20U	
88-74-4	2-Nitroaniline	20U	
131-11-3	Dimethyl Phthalate	20U	
208-96-8	Acenaphthylene	20U	
99-09-2	3-Nitroaniline	20U	

CAS Number		ug/l or ug/Kg (Circle One)
83-32-9	Acenaphthene	20U
51-28-5	2, 4-Dinitrophenol	40U
100-02-7	4-Nitrophenol	40U
132-64-9	Dibenzofuran	20U
121-14-2	2, 4-Dinitrotoluene	20U
606-20-2	2, 6-Dinitrotoluene	20U
84-66-2	Diethylphthalate	20U
7005-72-3	4-Chlorophenyl-phenylether	20U
86-73-7	Fluorene	3.5J ~~20U~~
100-01-6	4-Nitroaniline	20U
534-52-1	4, 6-Dinitro-2-Methylphenol	40U
86-30-6	N-Nitrosodiphenylamine (1)	20U
101-55-3	4-Bromophenyl-phenylether	20U
118-74-1	Hexachlorobenzene	20U
87-86-5	Pentachlorophenol	40U
85-01-8	Phenanthrene	20U
120-12-7	Anthracene	20U
84-74-2	Di-n-Butylphthalate	20U
206-44-0	Fluoranthene	20U
92-87-5	Benzidine	20U
129-00-0	Pyrene	20U
85-68-7	Butylbenzylphthalate	20U
91-94-1	3, 3'-Dichlorobenzidine	20U
56-55-3	Benzo(a)Anthracene	20U
117-81-7	bis(2-Ethylhexyl)Phthalate	55 ~~20U~~
218-01-9	Chrysene	20U
117-84-0	Di-n-Octyl Phthalate	20U
205-99-2	Benzo(b)Fluoranthene	20U
207-08-9	Benzo(k)Fluoranthene	20U
50-32-8	Benzo(a)Pyrene	20U
193-39-5	Indeno(1, 2, 3-cd)Pyrene	20U
53-70-3	Dibenz(a, h)Anthracene	20U
191-24-2	Benzo(g, h, i)Perylene	20U

(1)-Cannot be separated from diphenylamine

Laboratory Name: _____

Case No: 5502

Organics Analysis Data Sheet
(Page 3)

Pesticide/PCB

Concentration: (Low) Medium (Circle One)

Date Extracted/Prepared: 4/2/86

Date Analyzed: ~~4/7/86~~ 4/11/86 RP

Conc/(Dil Factor): 1

CAS Number		(ug/l or ug/Kg (Circle One))
319-84-6	Alpha-BHC	0.07 u
319-85-7	Beta-BHC	0.07 u
319-86-8	Delta-BHC	0.07 u
58-89-9	Gamma-BHC (Lindane)	0.07 u
76-44-8	Heptachlor	0.03 u
309-00-2	Aldrin	0.03 u
1024-57-3	Heptachlor Epoxide	0.23 u
959-98-8	Endosulfan I	0.06 u
60-57-1	Dieldrin	0.09 u
72-55-9	4,4'-DDE	0.07 u
72-20-8	Endrin	0.12 u
33213-65-9	Endosulfan II	0.03 u
72-54-8	4,4'-DDD	0.07 u
7421-93-4	Endrin Aldehyde	0.20 u
1031-07-8	Endosulfan Sulfate	0.43 u
50-29-3	4,4'-DDT	0.03 u
72-43-5	Methoxychlor	0.53 u
53494-70-5	Endrin Ketone	0.20 u
57-74-9	Chlordane	0.20 u
8001-35-2	Toxaphene	0.9 u
12674-11-2	Aroclor-1016	0.43 u
11104-28-2	Aroclor-1221	0.87 u
11141-16-5	Aroclor-1232	0.10 u
53469-21-9	Aroclor-1242	0.73 u
12672-29-6	Aroclor-1248	0.53 u
11097-69-1	Aroclor-1254	0.27 u
11096-82-5	Aroclor-1260	0.29 u

WK4/1-16

V_i = Volume of extract injected (ul)

V_s = Volume of water extracted (ml)

W_s = Weight of sample extracted (g)

V_t = Volume of total extract (ul)

V_s 1000 or W_s _____ V_t 10000 V_i 5

TABLE 1

Sample Descriptions

Central Steel Drum

Newark, New Jersey

CASE #5507

Sample ID Number	Organic Traffic Report #	Inorganic Traffic Report #	Date	Time (Hours)	Sample Type	Sample Location
S1	BF590	MBF433	2/05/86	1108	Soil	Adjacent to conveyer belt in drain staging area.
S2	BF591	MBF434	2/05/86	1126	Soil	Fifty feet from incinerator adjacent to conveyor belt.
S3	BF592	MBF435	2/05/86	1135	Soil	Adjacent to manifest waste storage on south side of incinerator.
S4	BF593	MBF436	2/05/86	1555	Soil	Adjacent to drainage ditch at southeast corne of property.
GW1	BF583	MBF426	2/05/86	1235	Aqueous	Shallow well #102 by entrance.
GW2	BF584	MBF427	02/85/86	1400	Aqueous	Deep well #202 by entrance.
GW3	BF585	MBF428	2/05/86	1545	Aqueous	Deep well #204 at southeast corner of property.
SW1	BF589	MBF432	2/05/86	1500	Aqueous	Surface water from drainage ditch at southeast corner of property.
Blank-1	BF594	MBF437	2/05/86	N/A	Sample Blank	U.S. EPA Lab Edison, NJ.

Footnotes:

NR - not required by contract at this time.

Form I:

Value - If the result is a value greater than or equal to the instrument detection limit but less than the contract required detection limit, report the value in brackets (i.e., [10]. Indicate the analytical method used with P (for ICP/Flame AA) or F (for furnace).

U - Indicates element was analyzed for but not detected. Report with the detection limit value (e.g., 10U).

E - Indicates a value estimated or not reported due to the presence of interference. Explanatory note included on cover page.

S - Indicates value determined by Method of Standard Addition.

R - Indicates spike sample recovery is not within control limits.

* - Indicates duplicate analysis in not within control limits.

\+ - Indicates the correlation coefficient for method of standard addition is less than 0.995

Form I A

GW-1

EPA Sample No. MBF426

U.S. EPA Contract Laboratory Program
Sample Management Office
P.O. Box 818 - Alexandria, VA 22313
703/557-2490 FTS: 8-557-2490

Date 3/3/86

INORGANIC ANALYSIS DATA SHEET

LAB NAME JTC Environmental Cnslts. CASE NO. 5507

SOW NO. 784

LAB SAMPLE ID. NO. 72-3256 QC REPORT NO. 25C

Elements Identified and Measured

Concentration: Low ✓ Medium ____

Matrix: Water ✓ Soil ____ Sludge ____ Other ____

ug/L or mg/kg dry weight (Circle One)

1.	Aluminum	18040 ✓	P	13.	Magnesium	58100	P
2.	Antimony	59UR	P	14.	Manganese	3130	P
3.	Arsenic	~~50 R~~	F	15.	Mercury	36	Cold.V.
4.	Barium	4210	P	16.	Nickel	293	P
5.	Beryllium	4.0U	P	17.	Potassium	32200	A
6.	Cadmium	96 E	P	18.	Selenium	~~25UR~~	F
7.	Calcium	234000	P	19.	Silver	9.3U	P
8.	Chromium	877 E	P	20.	Sodium	203000	P
9.	Cobalt	69 R	P	21.	Thallium	6.5UR	F
10.	Copper	12600 R	P	22.	Tin	2430 ER	P
11.	Iron	336000	P	23.	Vanadium	101	P
12.	Lead	32100 ✓	P	24.	Zinc	15200	P

Cyanide NR Auto An Percent Solids (%) NR

Footnotes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

Comments: ____

Lab Manager / ____

Form I B

U.S. EPA Contract Laboratory Program
Sample Management Office
P.O. Box 818 - Alexandria, VA 22313
703/557-2490 FTS: 8-557-2490

Date Feb '86

INORGANIC ANALYSIS DATA SHEET

LAB NAME JTC Environmental Cnslts. CASE NO. 55[illegible]

SOW NO. 784

LAB SAMPLE ID. NO. 72-3257 QC REPORT NO. [illegible]

Elements Identified and Measured

Concentration: Low ✓ Medium _____

Matrix: Water ✓ Soil _____ Sludge _____ Other _____

ug/L or mg/kg dry weight (Circle One)

1. Aluminum	132000	P	13. Magnesium	[illegible]	P
2. Antimony	~~590~~	P	14. Manganese	[illegible]	P
3. Arsenic	50UR	P	15. Mercury	0.4U	CVAA
4. Barium	2290	P	16. Nickel	[illegible]	P
5. Beryllium	8	P	17. Potassium	[illegible]	P
6. Cadmium	26 E	P	18. Selenium	[illegible]	P
7. Calcium	1478000	P	19. Silver	9.3U	P
8. Chromium	237 E	P	20. Sodium	4880000	P
9. Cobalt	192 R	P	21. Thallium	6.5UR	P
10. Copper	501 R	P	22. Tin	37U ER	P
11. Iron	294000	P	23. Vanadium	361	P
12. Lead	474	P	24. Zinc	1010	P
Cyanide	NR	Auto An	Percent Solids (%)	NR	

Footnotes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

Comments:

Lab Manager [signature]

GW3

Form I C

U.S. EPA Contract Laboratory Program
Sample Management Office
P.O. Box 818 - Alexandria, VA 22313
703/557-2490 FTS: 8-557-2490

EPA Sample No. MBF428

Date 3/4/86

INORGANIC ANALYSIS DATA SHEET

LAB NAME JTC Environmental Cnslts. CASE NO. 5507

SOW NO. 784

LAB SAMPLE ID. NO. 72-3258 QC REPORT NO. 25C

Elements Identified and Measured

Concentration: Low ✓ Medium _____

Matrix: Water ✓ Soil _____ Sludge _____ Other _____

ug/L or mg/kg dry weight (Circle One)

1. Aluminum	41700 *	P	13. Magnesium	754000	P
2. Antimony	59 U R	P	14. Manganese	1240	P
3. Arsenic	~~50 U R~~	F	15. Mercury	0.25	Cold.V.
4. Barium	572	P	16. Nickel	61	P
5. Beryllium	4.0 U	P	17. Potassium	184000	A
6. Cadmium	219 E	P	18. Selenium	~~25 U P~~	F
7. Calcium	255000	P	19. Silver	9.3 U	P
8. Chromium	88 E	P	20. Sodium	5900000	P
9. Cobalt	50 R	P	21. Thallium	10 UR	F
10. Copper	89 R	P	22. Tin	37 U ER	P
11. Iron	107000	P	23. Vanadium	165	P
12. Lead	101 S *	F	24. Zinc	1880	P

anide NR Auto An Percent Solids (%) NR

otnotes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

mments:

Lab Manager EE

Form I D

U.S. EPA Contract Laboratory Program
Sample Management Office
P.O. Box 818 - Alexandria, VA 22313
703/557-2490 FTS: 8-557-2490

Date [illegible]

INORGANIC ANALYSIS DATA SHEET

LAB NAME JTC Environmental Cnslts.

CASE NO. [illegible]

SOW NO. 784

LAB SAMPLE ID. NO. 72-3259

QC REPORT NO. [illegible]

Elements Identified and Measured

Concentration: Low ✓ Medium ____

Matrix: Water ✓ Soil ____ Sludge ____ Other ____

(ug/L) or mg/kg dry weight (Circle One)

Aluminum	3780 *	P	13.	Magnesium	19800	P
Antimony	59 u R	P	14.	Manganese	540	P
Arsenic	~~50 u R~~	P	15.	Mercury	2.6	[illegible]
Barium	1190	P	16.	Nickel	84	P
Beryllium	4.0 u	P	17.	Potassium	7360	P
Cadmium	24 E	P	18.	Selenium	~~5.0 u R~~	P
Calcium	68900	P	19.	Silver	15	P
Chromium	233 E	P	20.	Sodium	63400	P
Cobalt	41 R	P	21.	Thallium	6.5 u R	F
Copper	635 R	P	22.	Tin	96 E R	P
Iron	21200	P	23.	Vanadium	23 u	P
Lead	2460 *	P	24.	Zinc	1490	P

Cyanide NR Auto An

Percent Solids (%) NR

Footnotes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

Comments:

Lab Manager [signature]

S1

Form I E

U.S. EPA Contract Laboratory Program
Sample Management Office
P.O. Box 818 - Alexandria, VA 22313
703/557-2490 FTS: 8-557-2490

EPA Sample No.
MBF433

Date 3/4/86

INORGANIC ANALYSIS DATA SHEET

LAB NAME JTC Environmental Cnslts. CASE NO. 5507

SOW NO. 784

LAB SAMPLE ID. NO. 72-3260 QC REPORT NO. 25C

Elements Identified and Measured

Concentration: Low ✓ Medium _____

Matrix: Water _____ Soil ✓ Sludge _____ Other _____

ug/L or (mg/kg) dry weight (Circle One)

1.	Aluminum	7260 *	P	13.	Magnesium	4420	P
2.	Antimony	45UR	P	14.	Manganese	716	P
3.	Arsenic	11	F	15.	Mercury	4.7	Cold.V.
4.	Barium	3310	P	16.	Nickel	110	P
5.	Beryllium	3.0U	P	17.	Potassium	1340U	A
6.	Cadmium	115 R	P	18.	Selenium	19U R	F
7.	Calcium	19900 *	P	19.	Silver	7.1UR K	P
8.	Chromium	1110	P	20.	Sodium	3810	P
9.	Cobalt	53	P	21.	Thallium	5.0U	F
10.	Copper	916	P	22.	Tin	229 *	P
11.	Iron	120000	P	23.	Vanadium	[29]	P
12.	Lead	7070 *	P	24.	Zinc	3400	P

Cyanide NR Auto An Percent Solids (%) 65.40

Footnotes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

Comments:

Lab Manager EB

Form I F

U.S. EPA Contract Laboratory Program
Sample Management Office
P.O. Box 818 - Alexandria, VA 22313
703/557-2490 FTS: 8-557-2490

EPA Sample No. MBF12

Date 3-21-86

INORGANIC ANALYSIS DATA SHEET

LAB NAME JTC Environmental Cnslts. CASE NO. 550

SOW NO. 784

LAB SAMPLE ID. NO. 72-3261 QC REPORT NO.

Elements Identified and Measured

Concentration: Low ✓ Medium

Matrix: Water Soil ✓ Sludge Other

ug/L or (mg/kg) dry weight (Circle One)

1.	Aluminum	7070	P	13.	Magnesium	2830	P
2.	Antimony	46.4 R	P	14.	Manganese	2130	P
3.	Arsenic	3.9 U	P	15.	Mercury	1.2	CV
4.	Barium	6470	P	16.	Nickel	122	P
5.	Beryllium	3.1 U	P	17.	Potassium	1370 U	P
6.	Cadmium	9.7 R	P	18.	Selenium	3.9 U R	P
7.	Calcium	18200 *	P	19.	Silver	7.3 U R *	P
8.	Chromium	1360	P	20.	Sodium	3910 U	P
9.	Cobalt	129	P	21.	Thallium	5.1 U	P
10.	Copper	1250	P	22.	Tin	1780 *	P
11.	Iron	409000	P	23.	Vanadium	20	P
12.	Lead	10400	P	24.	Zinc	4180	P

Cyanide NR Auto An Percent Solids (%) 63.65

Footnotes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

Comments:

Lab Manager

Form I H S4

U.S. EPA Contract Laboratory Program
Sample Management Office
P.O. Box 818 - Alexandria, VA 22313
703/557-2490 FTS: 8-557-2490

EPA Sample No.
MBF436

Date 3/4/86

INORGANIC ANALYSIS DATA SHEET

LAB NAME JTC Environmental Cnslts.

CASE NO. 5507

SDG NO. 784

LAB SAMPLE ID. NO. 72-3263

QC REPORT NO. 25C

Elements Identified and Measured

Concentration: Low ✓ Medium _____

Matrix: Water _____ Soil ✓ Sludge _____ Other _____

ug/L or (mg/kg) dry weight (Circle One)

1.	Aluminum	9770	P	13.	Magnesium	4420	P
2.	Antimony	45U R	P	14.	Manganese	382	P
3.	Arsenic	9.3	F	15.	Mercury	2.2|	Cold.V.
4.	Barium	554	P	16.	Nickel	54	P
5.	Beryllium	3.1U	P	17.	Potassium	1360U	A
6.	Cadmium	1| R	P	18.	Selenium	3.9U R	F
7.	Calcium	4710 *	P	19.	Silver	7.2U R *	P
8.	Chromium	159	P	20.	Sodium	3870U	P
9.	Cobalt	[28]	P	21.	Thallium	6.5U 5.0U	F
10.	Copper	295	P	22.	Tin	112 *	P
11.	Iron	53900	P	23.	Vanadium	[23]	P
12.	Lead	1030	P	24.	Zinc	678	P

Cyanide NR Auto An

Percent Solids (%) 64.35

Notes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

Comments: _____

Lab Manager _____

Form I I

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:. EPA Contract Laboratory Program
iple Management Office
'. Box 818 - Alexandria, VA 22313
/557-2490 FTS: 8-557-2490

EPA Sample No. MBF 457

Date 3/4/86

INORGANIC ANALYSIS DATA SHEET

NAME JTC Environmental Cnslts.

NO. 784

CASE NO. 5507

SAMPLE ID. NO. 72-3264

QC REPORT NO. 22

Elements Identified and Measured

:entration: Low ✓ Medium ____

:ix: Water ____ Soil ✓ ~~field blank~~ Sludge ____ Other ____

mh 5/4/86

(ug/L) or ~~mg/kg~~ dry weight (Circle One)

Aluminum	170U	P	13.	Magnesium	920U	P
Antimony	59UR	P	14.	Manganese	12U	P
Arsenic	~~6.5UR~~	F	15.	Mercury	0.20U	Cold V.
Barium	29U	P	16.	Nickel	40U	P
Beryllium	4.0U	P	17.	Potassium	1750U	A
Cadmium	5.0UE	P	18.	Selenium	~~[illegible]~~ R	F
Calcium	1260U	P	19.	Silver	9.3U	P
Chromium	9.4U E	P	20.	Sodium	4980U	P
Cobalt	18UR	P	21.	Thallium	6.5UR	F
Copper	21UR	P	22.	Tin	37U ER	P
Iron	88U	P	23.	Vanadium	23U	P
Lead	5.0U*	F	24.	Zinc	38	P
Ide	NR	Auto An		Percent Solids (%)	NR	

notes: For reporting results to EPA, standard result qualifiers are used as defined on Cover Page. Additional flags or footnotes explaining results are encouraged. Definition of such flags must be explicit and contained on Cover Page, however.

ents:

Lab Manager [signature]

HAZARDOUS WASTE INVESTIGATION

Inspector: Mike Nalbone Date: Nov. 27, 1979

Location: Central Steel Drum

St: 704 Doremus Ave.

Town: Newark

County: Essex

Lot: 2 Block: 5074

Origin of Complaint: Anonymous

Complaint: Drum reclaimer burying waste in back of property.

Findings: On Nov. 27, 1979, I investigated Central Steel Drum on 704 Doremus Ave. and spoke with Mr. Skuraton owner of the company. I indicated to Mr. Skuraton that a complaint was called in to our office regarding his disposal practices. Mr. Skuraton wanted to know the complaintent who called in which at that time I told him it was confidential. Mr. Skuration rechecked with George Samajda by telephone and was told again that it was confidential.

Mr. Skuraton and I walked the site including the rear area of the property for any ash waste being buried there. I noted on site two incinerators for drum reclaimation, the main incinerator and a sludge burner incinerator. I was told that any ashes left after going thru two incinerations is put in a roll off container. The hauler of this waste is Andy Fiore & Sons. During my investigation I did note an area in the rear of the property which was higher than the surrounding property with dozer tracks. (See area (A) on attached sketch.) Two samples were taken from this particular area for analysis. Mr. Skuraton indicated that this area was where the dirt was moved from the driveway when grading was done.

Previous to my inspection of the site it had rained the day before leaving the ground very muddy. The area sampled appeared to be some other material other than mud because of its fine texture rather than a coarse muddy texture of dirt.

I also noted 10 drums on site full of material. These drums were located behind the parked trailers next to the drainage creek (see area (B)).

Recommendation: will be given after analysis of sample is known.

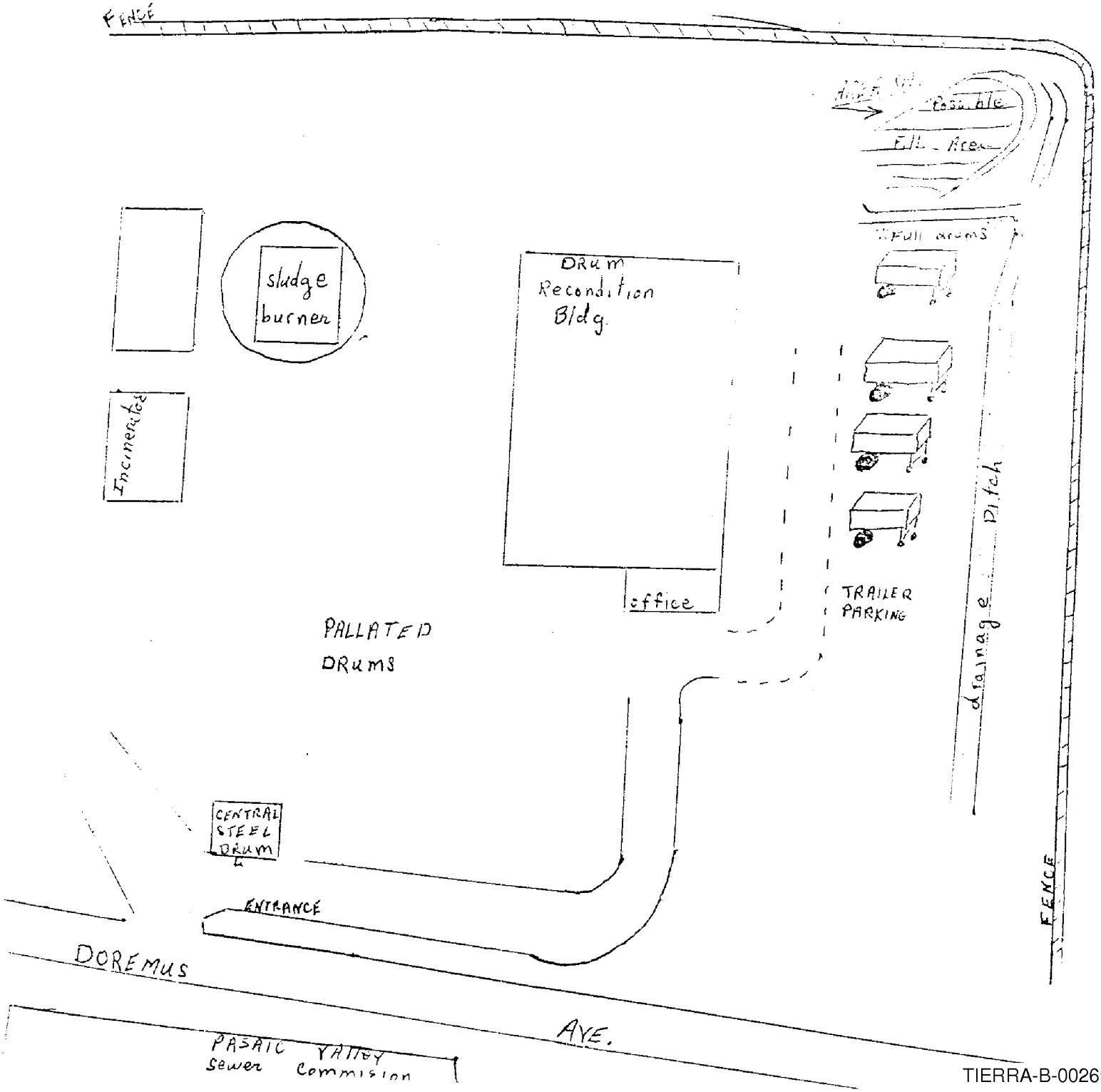
Mike Nalbone

Mike Nalbone

11b

BB0000031

Central Steel Drum



COPY SENT TO: DELAWARE RIVER

Central Steel Drum Co.
704 Doremus Avenue
Newark, N.J. 07105
EPA I.D. # NJD011482577

December 7, 1981

Objective:

On December 7, 1981 Angela Morales (Source Monitoring Section), John Witkowski (Emergency Response Section), Hank Wheat and Mike Skirka (Technical Assistance Team) were asked to perform a joint inspection at Central Steel Drum located at 704 Doremus Avenue, Newark, N.J. 07105. This site was referred to us by enforcement to determine possible RCRA, CERCLA, NPDES and FWPCA violations.

History of site

Central Steel Drum (CSD) is a steel drum reconditioning company which accepts "empty drums" for processing. Prior to the inception of this company, the facility was used by an ink pigment manufacturer.

C.S.D. Company processes approximately 3,000 thirty and fifty-five gallon "empty drums" per day, but receives daily shipments of varying quantities of these drums. Not all shipments are processed the same day since certain grades of drums are are in higher demand than others. Approximately 30% of incoming drums formerly contained material from the paint industry, 30-40% contained materials from the food industry and the remaining 30-40% contain varying miscellaneous residues such as adhesives, inks and sandy material.

Operating Process at Facility

C.S.D. Co. refinishes "empty drums" by putting them through a process line, part of which involves incineration, cleaning and painting.

C.S.D. Co. claims to operate a "dry process", where water is not a waste product but is recycled. The water in this operation is used for cooling purposes associated with the incinerator.

At the beginning of the refinishing process, drums are turned upside down on a conveyor line and moved through the drum incinerator where the residue inside the drum is burned at 2,000° F. During the process, a sludge is generated and accumulated by a scraper belt into an open bin. Any sludge not removed by the scrapers is removed by hand and stored in open drums. The bin and any drums containing this sludge is then taken to the sludge incinerator that exposes the sludge to a temperature range of 2,000°-2,600°F for 8 hours (Official stated C.S.D. Co. was having problems with the incinerator). The resultant ash is then scraped out by hand from the incinerator and accumulated in a pile 10-15 feet away. This pile is reportedly placed on a concrete slab with no containment or protection from wind or rain erosion. The pile is approximately 4-5 feet high and 15 feet in diameter.

C.S.D. Co. has their waste ash transported by Jonas Waste Removal located at Barkridge Road, Sewell, N.J. 08080 and it is disposed of at Geological Reclamation Operations and Waste Systems, Inc.(GROWS Inc.) located at Bordentown NewFord Mill Road in Morrisville, PA. 19067.

FINDINGS: Based upon information provided by company officials and a review of existing records.

Manifest System:

C.S.D. Co had an insufficient manifest system. The TSD facility certification form was not found along with the generator form. Parts of the manifest were not completely filled out(ie. DOT waste description was missing). In addition, manifests for shipments prior to January 1981 were not available on request. There were a total of 11 manifest out of a possible 17 shipments.

Inspection Schedule:

No written inspection plan was available upon request. No one is assigned the responsibility of checking the waste for signs of disturbance.

Personnel Training:

No documents indicating job descriptions, actual training or future training to be given to personnel were available upon request.

Contingency Plan:

No contingency plan was available. The emergency coordinator is the supervisor in the vicinity of the emergency.

Operating Record:

No operating records were available upon request. Information on the location waste analysis, and operating summary reports of the waste ash were not available.

Closure and Post-Closure Plan:

No plans were available on request.

Waste Analysis Plan:

CSD did not have their own waste analysis plan but, Mr. Adamson, the plant manager, showed us two waste analysis performed by GROWS Inc. on the ash pile CSD manifests as non-hazardous. (See Appendix C for a recent EP Toxicity waste analysis performed on the waste ash.)

Visual Inspection of Facility

Mr. Adamson conducted a tour of the facility operations. All members of the inspection team were present with the exception of Mike Skirka who stayed behind with the equipment that was brought to the facility.

En route to the incinerating portion of the facility we were conducted past machinery that was throwing particules into the air and obstructing our vision. In addition, "empty drums" were blocking the way and were immediately removed by Mr. Adamson. Also, the corridors were filled with sludge and particulate matter. Upon arriving at the incinerator, we found approximately three men, without respiratory protection, loading drums with Sherwin-Williams labels onto a conveyor belt leading into the incinerator. At this point fumes were coming from the incinerator and Ms. Morales informed Mr. Adamson that she could not stay at this point of the process for too long a period of time. As the drums with Sherwin-Williams labels entered the incinerator, a plume of grey smoke and combustion by-product was emitted from the incinerator. At this point Hank Wheat, who was operating an HNU photoionization analyzer (organic vapor detector) indicated to us that the meter had been fluctuating and was now reading off scale(over 2,000 ppm). Standard operating procedure required that we wear Self-Contained Breathing Apparatus(SCBA) protection so we immediately left the incineration area. While leaving the area, another darker plume and an acidic mist surrounded us. The incinerator operation came to a halt for lunch break and the plume and mists dispersed.

Mr. Adamson then took us to the sludge burning incinerator and showed us how the scraper system worked. He stated that the company was having problems with the sludge incinerator and that it was presently burning sludge at a temperature range of 2,000-2,600°F for 8 hours. The resultant ash is scraped out of the incinerator by hand and is accumulated on what appeared to be bare ground 15 feet away. The pile is offered no protection from the elements. The pile is reportedly transported from the facility every ten days in a 20 cubic yard container.

At this point it was noted by Ms. Morales and Mr. Wheat, that there were random open drums filled with sludge matter and also drums with more than an inch of an adhesive or resin material inside. Some drums were found laying on the ground in disarray with resinous material spilling from it.

The inspection team then started back to the office and, en route, noted what appeared to be a ditch on the southeastern part of the facility. When asked what it was, Mr. Adamson stated that it was a small creek and that he would provide us with the name when we returned to the office. The area around the ditch appeared to be disturbed and the ditch had a green color with an oily sheen to it. Upon arriving at the office, Mr. Adamson asked Mr. Fischer(the company Secretary who signed the notification form) the name of the creek and no one seemed to know.

This concluded the inspection.

DISCUSSION

CSD recycles "empty drums" and in the process a sludge is generated. This sludge is then burned in a sludge burning incinerator which turns the sludge into an ash. CSD does not perform waste analysis on their waste since they believe it to be non-hazardous after it is burned. A waste analysis was performed by GROWS Inc.'s outside independent laboratory, Ages Laboratory located in Potstown, PA. GROWS Inc. has a Retesting Policy that requires that a sample of waste be tested every year to insure that the waste they receive is the same as the initial shipment. The initial sample in this case was tested on July 8, 1980 and the retested sample was tested on July 16, 1981(Please note the date of letter in Appendix C.) The analysis performed on the waste ash sample include a test for EP Toxicity which showed the sample to be EP Toxic for lead. CSD is in violation for not manifesting their waste as hazardous and for not providing their own Waste Analysis Plan.

In a letter to Julio Morales-Sanchez, Director of Enforcement,(See Appendix A) CSD stated it did not file for a Part A permit since they do not take in materials for treatment nor do they store for more than 90 days. There seems to be confusion on their part since these elements are not the only criteria for falling within the jurisdiction of a TSD facility. This puts them in violation for treating hazardous waste without a TSD permit. It appears from the letter that CSD may have been in the computer system as having submitted a Part A application but, then deleted as a result of their letter to EPA.

There have been additional violation such as lack of Records Inspection, Facility Inspection and Contingency Plan. Also their waste pile and incinerator do not meet RCRA specifications.

RECOMMENDATIONS:

Enforcement action be taken.

Suggest that a sampling inspection be performed at the facility by both the Air and Water Sections of EPA for possible contamination of air, soil, groundwater and nearby creek.

Suggest that the Local Health Department be notified concerning health violations. OSHA was called and arrived at the facility on December 8th, 1981. They cited CSD for not having an adequate cover on one of their pulleys.

CSD has called in Environmental Consulting Testing located in Cherry Hill, N.J. to perform an environmental audit on the facility. It is recommended that EPA obtain their report on the site which should be ready in approximately two weeks.

Notify DEP of CSD's operations and possible violations.

Let's protect our earth

07-14-15

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
CN 028
Trenton, N.J. 08625-0028
(609) 633-1408
Fax # (609) 633-1454

SEP 21 1990

Mr. Neil Fischer
Central Steel Drum Company
704 Doremus Avenue
Newark, NJ 07105

5

Dear Mr. Fischer:

Re: Notice of Violation

Enclosed please find a Notice of Violation for violations of the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq., specifically N.J.A.C. 7:26-1 et seq. and the Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq., specifically N.J.A.C. 7:1E-1 et seq., which were observed during my site inspection on August 14, 1990. Be advised that actions to correct these violations must be completed by the date referenced on the aforementioned notice and that you shall inform me, in writing, that you have taken such actions. Also, be aware that although no penalty is being assessed for these violations at the present time, nothing shall preclude the Department from assessing penalties for these violations at a later date.

If you have any questions or concerns please call me at (609) 633-0719.

Sincerely,

David W. Paddock

David Paddock, Case Manager
Bureau of State Case Management

Enclosure

c: Colleen Kokas, Acting Section Chief, BSCM, w/encl.
Thomas Brady, Field Inspector, BFO, w/encl.

BBC0000048

HWM-004
1/90

Let's protect our earth

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
CN 028, Trenton, N.J. 08625-0028

Location:
401 E. State St., 5th Fl.

NOTICE OF VIOLATION

Page 2 of 2

ID NO. NJD011482577 DATE 9/19/90

NAME OF FACILITY Central Steel Drum

LOCATION OF FACILITY 718 Clarence Avenue, Newark N.J.

NAME OF OPERATOR Neil Fischer

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION Discharge of a Hazardous Substance onto the lands or into the waters of the State in violation of NJSA 58:10-23.11 C. Failure to notify the Department of said discharge in violation of NJAC 7:1E-2.1(b)1. (and)

Remedial action to correct these violations must be initiated immediately and be completed by October 1, 1990. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

David W. Kaufman

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

HWM-004
1/90

Let's protect our earth

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
CN 028, Trenton, N.J. 08625-0028

Location:
401 E. State St., 5th Fl.

NOTICE OF VIOLATION

Page 1 of 2

ID NO. NJD011482577 DATE 9/18/90

NAME OF FACILITY Central Steel Drum

LOCATION OF FACILITY 701 Doremus Avenue Newark NJ

NAME OF OPERATOR Neil Fischer

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION Failure to mark drums with accumulation dates and contents in violation of NJAC 7:26-9.3(a)3 Transfer and Storage of a hazardous waste, namely the incinerator ash, in a manner which causes an unpermitted discharge of pollutants onto the land or into the surface waters of the State in violation of NJAC 7:26-9.2(a)2 (continued)

Remedial action to correct these violations must be initiated immediately and be completed by October 1, 1990. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

David W. Kadlubek

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

RESPONSIBLE PARTY INVESTIGATION SUMMARY

CENTRAL STEEL DRUM
704 DOREMUS AVENUE
NEWARK, ESSEX COUNTY, NJ
EPA ID # NJD011482577

Central Steel Drum (CSD) is an active drum reconditioning facility located in a heavily industrialized area of Newark, Block 5074 Lot 1. The facility property covers 8.5 acres and is bordered by the Bay Shore Connecting Railroad to the west and Paragon Oil Company/Texaco to the south and east.

CSD has operated at the site since 1952. Prior to 1952 the site was occupied by an ink manufacturer, the International Printing Ink Division of Interchemical Corporation, which is now part of Inmont Corporation. Historical maps of the area show several building structures and 4 large oil tanks in the vicinity of the site in 1951, which also appear to have encompassed a portion of the Paragon Oil/Texaco property to the southeast.

A title/deed lookup indicates that the subject property was purchased from Interchemical Corp. in 1952 by the following persons: Bessie Baron, Mollie Ratner, Dorothy Greenberg, and Gertrude Greenberg. Present ownership of the property is under the names of Bessie Baron, Mollie Ratner, and Dorothy Greenberg. A lease agreement contract was made in 1966 for CSD to lease the property for a term of 10 years at an annual rent of $42,000. with renewal for an additional 10 years at $36,000. Prior to 1966 the above persons owned the property under the name of Dore Realty, which incorporated in 1965 and dissolved in 1966. The certificate of dissolution was signed by the following persons: Bessie Baron, Mollie Ratner, Abbie Greenberg, and Dorothy Greenberg.

The facility contains drum unloading and storage areas, a drum reconditioning building, a drum process incinerator and sludge incinerator, and paint shed. Drums are first processed through the main incinerator where residues are burned, generating a sludge which is stored in rolloff containers prior to being shipped offsite for disposal. Prior to 1983 sludge was burned in an incinerator and ash from the process was stored in open piles without containment. CSD has air permits for an incinerator, paint spray booth, main drum tunnel, and dust collector. The facility processes about 3,000 drums per day. Drums processed at the CSD facility are from the paint industry and food industry, along with other industries which produce adhesives and inks. A list of major drum suppliers submitted by CSD in 1982 is given in Attachment 1.

NJDEP involvement with the site began in 1979 as a result of an anonymous complaint that CSD was burying waste in the back of the property. A NJDEP inspection reported 10 drums full of unknown material behind several parked trailers next to a drainage creek in the southeast portion of the facility. During a follow-up inspection by NJDEP in January 1980, CSD representatives indicated that ash from the incinerator was being used to fill potholes at the facility and was also used as fill material in the rear of the property next to the drainage creek. Also noted were 2 piles of smoldering incinerator ash on the ground surface above the fill area.

A Notice of Prosecution was issued by NJDEP to CSD on 3/28/80 to cease

waste disposal activities and remove contaminated material which was buried onsite, however no records could be found to indicate that a cleanup of the fill area was ever conducted.

During September 1981 EPA conducted an inspection of the CSD facility after a response to a burning rail tank car at a nearby location. The CSD site was reported to be covered with pools of oil and unknown chemicals, some of which were observed flowing into adjacent drainage ditches and wetlands. A subsequent inspection by EPA representatives on 12/7/81 reported improper waste management practices, and noted the following observations:

- ash from the incinerator stored in open piles without containment prior to offsite disposal at GROWS Inc. landfill in Morrisville, Pa.
- leaking drums of resinous material onsite.
- drums containing greater than one inch of material.
- oily sheen in drainage ditch area.

A NJDEP inspection on 2/3/82 reported spillages of white sludge onsite, soil staining with purple and blue liquids, yellow and white solid material dumped in an area next to the drainage ditch, contaminated runoff from CSD facility into a stream at the southwestern section of the property, as well as sludge material, drums and oily sheen in the stream bed.

NJDEP files contain analyses of the CSD incinerator ash residue and solid waste material conducted by the following laboratories over the period 1980-1983:

- Applied Geotechnical and Environmental Services Corp. (AGES)	6/13/80
- G.R.O.W.S. Inc.	11/6/81
- S & W Waste Inc.	5/4/33
- Townley Research and Consulting Inc.	5/4/33

Contaminants detected in the above samples included the following substances: cadmium, chromium, copper, lead, zinc, carbon tetrachloride, chloroform, toluene, trichloroethylene, tetrachloroethylene, xylene, and petroleum hydrocarbons. EP Toxicity analyses by GROWS Inc. and S & W Waste showed the material to be EP toxic for lead.

CSD has shipped waste to the following facilities according to Bureau of Manifests and Information Systems records:

Facility	Waste Type	Period
S & W Waste Inc., Kearny, NJ	D008 (lead)	1984
SRS, Linden, N.J.	D001 (ignitable)	1984
Fondessy Enterprises, Oregon, Ohio	D008 (lead)	1984-1986
Michigan Disposal Inc., Belleville, Mich.	D008 (lead)	1984-1986
	X910 (solid)	1986-1987
City Sand and Landfill, Sumpter, Mich.	X910 (solid)	1987
Wayne Disposal Inc., Belleville, Mich.	D008 (lead)	1985-1986
	X910 (solid)	1987-1988

NJDEP inspections during 1983 included the collection of samples from various locations around the CSD facility. Soil samples analyzed by the NJDOH Laboratory showed volatile organic contamination up to 44,885 ppb. A

liquid sample from an auger hole showed total volatile organic contamination of 1,400 ppb. Soil samples analyzed by ETC showed soil contamination with benzene, ethylbenzene, toluene, methylene chloride, 1,1,1-trichloroethane, trichloroethylene, and tetrachloroethylene, with total VO concentrations on the order of 99,000 ppb. A drum sample showed the presence of methylene chloride, toluene, and 1,1,1-trichloroethane.

EPA issued a Consent Agreement and Final Compliance Order on 11/25/83 for a number of RCRA violations and also required the facility to conduct an investigation of contamination and develop a remediation program under the direction of NJDEP. A hydrogeologic assessment report was submitted by Environics on 4//9/85 to NJDEP/DHWM and DWR Metro Region Enforcement. A total of 6 monitoring wells were installed at the site, 3 shallow wells (10 feet deep) and 3 deep wells (25 feet deep). November 1985 sampling data showed the following metals to be present in the groundwater beneath the facility at concentrations above NJDEP groundwater quality criteria: arsenic, barium, cadmium, chromium, copper, lead, mercury, zinc. BNA and VO compounds were also detected in the groundwater at concentrations up to 412 ppb and 150 ppb, respectively. The most significant VO contaminants were xylene (104 ppb) and toluene (21 ppb). The case subsequently became inactive after 1985.

During 1987 the facility was inspected by DWR Enforcement and DEQ Bureau of Emergency Response. As a result of a DWR Enforcement inspection conducted 1/7/87, CSD was required to apply for a NJPDES-DGW permit. The facility submitted a NJPDES permit application during July 1987 which is currently under review by DWR Ground Water Discharge Control. On 4/24/87 the Bureau of Emergency Response responded to an emergency complaint of acrid odors entering the Conrail yard at 611 Delancy St. An inspection of the CSD facility reported smoldering debris from the furnace piled throughout the property and smoldering material in a rolloff container. Notices of Violation were issued for improper disposal of solid wastes, toxic air releases, and contamination of soil. A second inspection conducted in September 1987 reported illegal operations of the main incinerator and sludge burner along with massive fugitive emissions. During 1988 an ACO was issued by DEQ Enforcement requiring the facility to upgrade the drum incineration system.

EPA sent an Information Request Letter to CSD on 9/10/87 for information concerning RCRA activities. Samples of the incinerator residue were recently collected by EPA for EP Toxicity analyses in order to determine if the material should be classified as a hazardous waste.

The site was sampled in 1986 by the EPA contractor NUS Corp. as part of the CERCLA PA/SI program. Samples included 4 soil, 3 groundwater, and 1 surface water. The contaminants detected along with highest concentrations are listed below:

SOIL

barium	3310 ppm
chromium	1360 ppm
copper	916 ppm
lead	10,400 ppm
zinc	4,180 ppm
1,1,1-trichloroethane	160 ppb

tetrachloroechylene	3,900 ppb
toluene	92,000 ppb
ethylbenzene	38,000 ppb
styrene	33,000 ppb
xylene(s)	190,000 ppb
arochlor - 1254	1,900 ppb
chlordane	150,000 ppb

GROUNDWATER

barium	4,210 ppb
cadmium	219 ppb
chromium	877 ppb
lead	32,100 ppb
manganese	32,000 ppb
nickel	343 ppb
mercury	36 ppb
vanadium	361 ppb
zinc	15,200 ppb
methylene chloride	115 ppb
2-hexanone	6.3 ppb
1,1,2,2-tetrachloroethane	3.3 ppb
ethylbenzene	2.5 ppb
toluene	1.5 ppb
xylene(s)	2.7 ppb

SURFACE WATER (drainage ditch)

lead	2,460 ppb
acetone	2,088 ppb
2-butanone	3,872 ppb
4-methyl-2-pentanone	100 ppb
2-hexanone	6.3 ppb
1,1-dichloroethene	2.4 ppb
bromoform	2.4 ppb
1,1,1-trichloroethane	3.6 ppb
1,1,2,2-tetrachloroethane	5.9 ppb
toluene	46 ppb
ethylbenzene	6.1 ppb
xylene(s)	32 ppb

Soil contamination was detected from samples collected in the vicinity of the drum storage area, next to the rollof containers, and in the southeast corner of the property near the drainage ditch. Metal contaminants detected in the groundwater were generally higher for monitor wells located near the plant entrance, while volatile organic contamination was higher in samples collected from a monitor well in the rear of the property near the drainage ditch. The surface water sample showed volatile organic contamination in the drainage ditch which leads to the Newark Bay

CONCLUSIONS/RECOMMENDATIONS

Central Steel Drum Company should be considered the primary responsible party in this case based upon the sampling data as well as prior inspections by NJDEP personnel and observations of drum spillages and leakages, improper disposal/storage of incinerator ash and sludge, and general sloppy housekeeping methods. Substances found in the incinerator ash residue and drum samples were also detected in soil, groundwater, and surface water samples collected onsite. The property owners (Bassie Baron, Mollie Ratner, Dorothy Greenberg) should also be considered a responsible party.

The prior owner-operator Interchemical Corporation (now part of Inmont Corporation) is not considered a responsible party at this time since no detailed information could be obtained regarding their operation or waste disposal practices. Interchemical Corporation owned the property from 1948-1952 according to county records. An Information Request Letter may be used to obtain more information concerning operations by Interchemical Corp. at the subject site prior to 1952.

Soil at the CSD facility is contaminated with metals and volatile organic compounds. PCB contamination and chlordane were also detected in soil samples. Groundwater beneath the facility is contaminated with metals and volatile organics. Volatile organic contamination was also detected in a drainage ditch which leads to the Newark Bay. A study should be conducted to determine the extent of soil, groundwater, and surface water contamination, as well as any adverse impact on Newark Bay and nearby wetland areas. The facility should be required to develop a remediation plan for contaminated sections of the property under the direction of NJDEP as required by the Consent Agreement which was signed with EPA in 1983. The existing monitor wells and pending NJPDES-DGW permit may be considered for future site investigations.

Investigation Conducted By:

Edward Gaven, HSMS III 9-15-99
Bureau of Planning and Assessment
65 Prospect Street
Trenton, NJ
609-292-4320

RESPONSIBLE PARTY

1. Corporate Name: Central Steel Drum Company
   Address: 704 Doremus Avenue
   Newark, NJ 07105

   Registered Agent: Edward B. Fischer
   704 Doremus Avenue
   Newark, NJ 07105

   Corporate Status: Active, SIC code 3412. Central Steel Drum Company operates a single manufacturing facility in Newark, with 110 total employees.

   Financial Status: Current Dun and Bradstreet records indicate annual sales of $5,000,000. No information on total corporate assests was available.

   Principals: Alan Fischer
   President
   39 Harvey Dr.
   Short Hills, NJ
   Block 5001 Lot 8
   Assessed value (1984): $298,100

   Gerald Greenberg
   Vice President
   Last known address as of December 1983:
   1530 Palisades Avenue
   Fort Lee, NJ
   (This is a co-op complex known as "The Colony")

   Neil Fischer
   Vice President and Plant Manager
   47 Spencer Dr.
   Short Hills, NJ
   Block 5105 Lot 20
   Assessed value (1984): $182,700

   Edward Fischer
   Vice President
   Address listed in 1983 was the same as Alan Fischer.

   Jeffrey Skuraton
   Treasurer
   89 Hartshorn Dr.
   Short Hills, NJ
   Block 4004 Lot 15
   Assessed value (1985): $388,800

2. Property Owners: Bessie Baron
Mollie Ratner
Dorothy Greenberg

Address: 704 Doremus Avenue
Newark, N.J.

Corporate Status: The above persons may have operated under the name of Dore Realty Co., Inc. during 1965-1966. Dore Realty was dissolved in 1966 according to Department of State records, although the property owner certification on the NJPDES permit application identified Dore Realty Inc. as the present owner of the property, as signed by Gerald Greenberg, Vice-President for CSD.

Financial Status: Unknown; property value according to Newark Tax Assessors Ofice, Block 5074 Lot 1, is listed below:

land (8.5 acres):	$169,900
building	81,900
	$251,800

date of last assessment: 1986

DISCHARGE/ABANDONMENT INFORMATION:

Location: Central Steel Drum facility
704 Doremus Avenue
Newark, Essex County, NJ
Block 5074 Lot 1

SUBSTANCES DISCHARGED/ABANDONED: The following contaminants have been detected in soil and/or groundwater samples collected at the site:

barium
cadmium
chromium
copper
lead
mercury
zinc
1,1-dichloroethene
1,1,2,2-tetrachloroethane
1,1,1-trichloroethane
trichloroethylene
tetrachloroethylene
methylene chloride
benzene
ethylbenzene
toluene
xylene
acetone
2-butanone
4-methyl-2-pentanone
2-hexanone
arochlor 1254
chlordane

Description of Property affected: Soil throughout the 8.5 acre site is contaminated with the most significant contamination detected in the following areas:

- drum storage area
- vicinity of rolloff containers
- southeast portion of facility near drainage ditch.

Metals and volatile organic contaminants have also been detected in groundwater beneath facility. A drainage ditch which leads to the Newark Bay is alo affected from migration of contaminants from the CSD facility. Nearby wetlands and neighboring properties may also be affected including the Paragon oil/Texaco property to the southeast, known as Block 5074 Lots 3 and 5, which covers a total of 10.5 acres.

RELAVANT FILES AND CONTACTS

1. NJDEP Metro Regional Enforcement Files
   2 Babcock Place
   West Orange, NJ
   DHWM File #07-14-15: facility inspections, correspondence
   hydrogeologic assessment, sampling data
   Contact: Dave Beeman: 201-669-3960
   DEQ Plant ID# 05284: air permits, legal action log, inspection
   reports.
   Contact: Joseph Hoyle/Prit Pals: 201-669-3935
   DWR Files: NJPDES application, correspondence
   Contact: Tom Harrington: 201-669-3900

2. NJDEP/DWR Ground Waste Discharge Control
   401 East State Street
   Trenton, NJ
   NJPDES permit application hydrogeologic assessment
   Contact: Don Kramer: 609-292-0424

3. NJDEP/DWR Geological Survey
   25 Arctic Parkway
   Trenton, NJ
   Correspondence, sampling data,
   Contact: Emmanuel Charles: 609-292-0668

4. NJDEP/DWR Central File
   401 East State Street
   Trenton, NJ
   NJPDES # NJ0051772: NJPDES information, correspondence

5. NJDEP/DHWM/BHWE Central File
   401 East State Street
   Trenton, NJ
   RCRA status information

6. NJDEP/DHWM/Bureau of Manifests & Information Systems
   401 East State Street
   Trenton, NJ
   Hazardous waste manifests annual report
   Contact: Ken Klautman: 609-292-7081

7. NJDEP Information Resource Center
   432 East State Street
   Trenton, NJ
   Dun and Bradstreet financial assessments, corporate information
   Contact: Maria Baratta: 609-984-2249

8. NJ Department of State Division of Commercial Recording
   Mountain View Office Complex
   20 Bear Tavern Road
   West Trenton, NJ
   Certificates of incorporation

9. U.S. Environmental Protection Agency - Region II
   Hazardous Waste Compliance Branch
   Air and Waste Management Division
   26 Federal Plaza
   New York, NY
   Contact: James Sanderson: 212-264-6155

10. Newark Hall of Rcords
    Martin Luther King Blvd.
    Newark, NJ
    property deed information

11. Newark Engineering Department
    920 Broad Street
    Newark, NJ
    contact: Mr. Butler: 201-733-8520

CENTRAL STEEL DRUM COMPANY

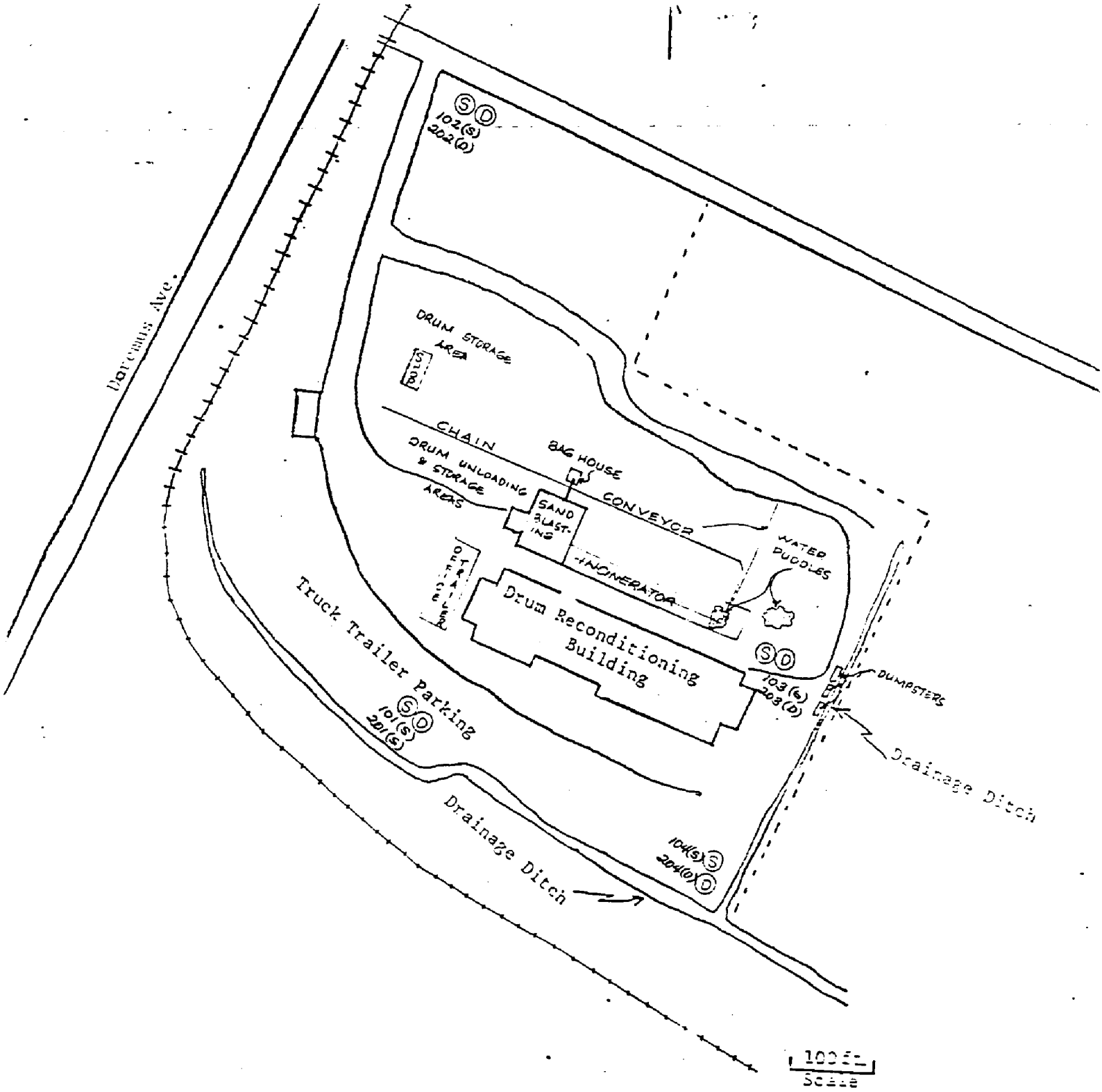
MAJOR DRUM SUPPLIERS & PRODUCTS

		PRODUCT
1.	Aunt Millies Sauces, Inc. 200 Brenner Drive Congers, New York 10920	Tomato Paste
2.	The Borden-Chemical Co. Ink Division 8-10 22nd St. Fair Lawn, New Jersey 07411	Inks
3.	Custom Chemical 30 Paul Kohnar Place East Paterson, New Jersey 07407	Pheonolic Coatings
4.	E. I. Du Pont De Nemours Chambers Works Deepwater, New Jersey	Chemicals
5.	Ferro Corporation Ferro Composites Div. Norwalk, Conn. 06856	Sealers
6.	Fitchburg Coated East Corey Street Moosic, Pennsylvania 18507	Hot Melt Adhesives
7.	R. B. Fuller Co. 59 Brunswick Ave. Edison, New Jersey 08817	Adhesives
8.	Glidden & Co. Third and Barn Sts. Reading, Pennsylvania 19601	Paint
9.	Globe Products 55 Webro Road Clifton, New Jersey 07015	Pie Fillings
10.	J. M. Huber Corp. Raritan Center Pershing Ave. Edison, New Jersey 08817	Ink
11.	Immont Corp. Color & Chemical Division Bound Brook, New Jersey 08805	Paint Bases

ATTACHMENT 1

		PRODUCT
12.	Inmont Corp. Color & Chemical Division Hawthorne, New Jersey 07506	Paint Bases and Intermediates
13.	Minute Maid Co. Coca Cola Division Hightstown, New Jersey 08520	Orange Juice Concentrate
14.	Mortell Company 144 Grant Street Perth Amboy, New Jersey 08862	Sealers
15.	National Starch & Chemical 225 Belleville Avenue Bloomfield, New Jersey 07014	Adhesives
16.	National Starch & Chemical 1735 West Front Street Plainfield, New Jersey 07061	Adhesives
17.	North Brunswick Coatings & Chemical 430 Jersey Avenue North Brunswick, New Jersey 08902	Paints
18.	Orelite Chemical Coatings Co. 62 Woolsey Street Irvington, New Jersey 07111	Paint
19.	Sicpa North America 25 Mc Lean Blvd. Paterson, New Jersey 07514	Printing Inks
20.	Sinclair & Valentine Co. Secaucus Road Secaucus, New Jersey 07094	Printing Inks

ATTACHMENT 1



Central Steel Drum Co.
704 Duremus Ave.
Newark, NJ

(S) Recommended locations for shallow monitor wells

(D) Recommended locations for deep monitor wells

IP-31

JM Sorge, Inc.

50 County Line Road, Somerville, NJ 08876 • (908) 218-0066
FAX (908) 218-9185

AUG 30 1993

September 13, 1991

RECEIVED
#2
SEP 16 1991
STATE OF NEW JERSEY
DEPT. ENVIRONMENTAL PROTECTION
DIVISION WATER RESOURCES
BUR. OF SEA. WASTE PERMIT

Mr. Ramamurthy Pyarilal, P.E.
Supervision Environmental Engineer
NJ Department Environmental Protection
Division of Water Resources
Surface Water Section
Bureau of Industrial Discharge Permits
CN 029
Trenton, NJ 08625-0029

Attn: Mr. Matthew Precinski

Re: Central Steel Drum Company
Newark, Essex County, NJ 0067199
NJDEP/DSW Permit Application

Dear Mr. Pyarilal:

The following provides the information requested by your office in accordance with the Notice of Administrative Deficiency correspondence dated August 16, 1991 for the above-referenced facility. The enclosed Form CP#1 (Attachment A) displays the proper lot and block numbers for the property and includes the necessary endorsements of the Applicant/Operator. Please note that the original Form CP#1 has been sent to the Applicant/Owner for the correct information with regard to Item 1a and for certification of Endorsement A. The correspondence requesting the property owner's signature is included as Attachment B. The original Form CP#1 will be sent to your office as soon as possible.

Form WQM-003 has been sent to the proper officials of the municipality and local sewerage authority for the required certifications (Endorsements A and C). Copies of the signed and dated letters requesting the proper endorsements, as well as the certified mail receipt, are provided as Attachment C. The certified mail return receipt will be provided to the Department shortly after it is received in this office.

Attachment D includes the two (2) figures requested. Figure 1 is a U.S.G.S. map which depicts the location of the subject facility, while Figure 2 is a site plan of the facility which provides the information requested in Item 5.c) of your August 16, 1991 correspondence.

BED000004

As discussed in the Central Steel Drum Company's (CSD) New Jersey Pollutant Discharge Elimination System/Discharge to Surface Water (NJPDES/DSW) permit application submitted to the Department in April 1991, general stormwater runoff entering the ditch at the southeast corner of the site is the subject of this DSW permit application. No specific "discharge pipe" or catch basin exists for the stormwater runoff. Rather, the ground surface acts as the "conveyance" for the stormwater which, during periods of heavy rainfall, reaches the ditch on the southern side of the property. No treatment system exists for this situation. The point source discharge location of the runoff is depicted on Figure 2 of Attachment D. The stormwater runoff comes in contact with the ground surface in the vicinity of the facility's incinerator unit where hazardous substances are present. This situation, as well as a description of the stormwater runoff process and the analytical results of numerous soil and groundwater samples collected at the site, was discussed, in detail, in the Attachments to the April 11, 1991 NJPDES/DSW permit application submitted by J M Sorge, Inc. (JMS) on behalf of CSD.

Regarding Item 5.d) of your August 16, 1991 correspondence, please note that significant rainfall is necessary to conduct the required sampling. A total volume of approximately 21 liters must be collected from the discharge to satisfy the analytical requirements of EPA Form 2C. Arrangements have been made with the analytical laboratory, Envirotech Research, Inc. of Edison, NJ, to provide the required sample bottles at very short notice so that the discharge can be sampled as soon as possible, providing the amount of rainfall is adequate. Upon completion of the discharge sampling and receipt of the laboratory analytical results, the entire EPA Form 2C will be completed and submitted to the Department.

Should you have any questions with regard to the CSD NJPDES/DSW permit application, please contact Mr. Joseph Sorge or me at your convenience.

Very truly yours,

James M. Clabby
Project Manager

JMC/nk

Enclosure
cc: Mr. Alan Fischer, CSD
Mr. Neil Fischer, CSD
Mr. Peter Herzberg, Esq.
Mr. Joseph Sorge, JMS

ATTACHMENT A

UPDATED FORM CP#1

Let's protect our earth

FOR OFFICIAL USE

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

STANDARD APPLICATION FORM (CP #1)

CONSTRUCTION PERMIT NUMBER 1

CONSTRUCTION AND DISCHARGE PERMITS

READ REQUIREMENTS — FOLLOW INSTRUCTIONS CAREFULLY — PLEASE PRINT OR TYPE

1a. Applicant/Owner** _____ Telephone ( ) _____

Permanent Legal Address _____

City or Town _____ State _____ Zip Code _____

Federal Tax I.D. or S.S. # _____

1b. Applicant/Operator Central Steel Drum Company Telephone (201) 344-8500

Permanent Legal Address 704 Doremus Avenue

City or Town Newark State NJ Zip Code 07105

1c. Co-permittee* N/A Telephone ( ) _____

Permanent Legal Address _____

City or Town _____ State _____ Zip Code _____

2. Location of Work Site 704 Doremus Avenue, Newark, NJ

Name of Facility, if applicable Central Steel Drum Company

Address (Street/Road) 704 Doremus Avenue

Lot No. 1 Block No. 5074 E.P.A. I.D. # NJD 0011482577

City or Town Newark State NJ Zip Code 07105

* Municipality Newark County Essex

3. If applicable, give name of: Engineer/Surveyor/Well Driller/Geologist/Soil Scientist *(Specify)*

Name Joseph M. Sorge N.J. License No. _____

Name of Firm, if employee J M Sorge, Inc.

Address (Street/Road) 50 County Line Road

City or Town Somerville State NJ Zip Code 08876

Municipality Branchburg County Somerset

Telephone (908) 218-0066

4. This is an application for New Jersey Polluntant Discharge Elimination System Permit
(Name of permit, certification, approval, jurisdictional determination, or exemption. See item 9, next page.)

Discharge to Surface Water

* *This section must be completed by any local governmental unit when it is a Co-permittee. (Not required for Treatment Works Approvals.)*

** *Sewer System Applications (Treatment Works Approvals) should be made on behalf of the eventual owner of the proposed system.*

DETACH FORM FROM PRECEDING DOCUMENT

5. Fee is attached (if applicable). $ N/A

6. Estimated construction cost of project:

   a. $ N/A total cost of the project
   b. $ N/A portion for which this permit is requested

7. I have included certifications of any public notifications. ____Yes ____No N/A

8. If applicable:
   (For Waterfront Development and Stream Encroachment applications, 8c. must be completed.)

   a. Source of Water Supply N/A - STORMWATER RUNOFF
   b. For Treatment at (Water Treatment Plant) N/A
   c. Stream, Waterway, Pond or Lake N/A
   d. Wastewater Treatment Facility N/A

9. Have any other applications for this site/project been submitted, or have any state permits been issued for this project? *(If yes, indicate status and project number below.)*

   X Yes _____No _____Decision

   Identify any state Green Acres or federal Land and Water Conservation Fund projects separately.

PERMIT TYPE *(Use additional sheets if necessary)*	APPLICATION STATUS (Pending - Approved)	PROJECT #
9.1 CAFRA		
9.2 Waterfront Development		
9.3 Tidal or Coastal Wetlands		
9.4 Freshwater Wetlands Permit		
9.5 Freshwater Wetlands Transitional Area Waiver (after July 1, 1989)		
9.6 Stream Encroachment		
9.7 Water Quality Certificate (Section 401)		
9.8 Open Water Fill		
9.9 Tidelands (Riparian) Grant, Lease or License		
9.10 Dam Construction/Repair		
9.11 Purchase Water Diversion:		
9.12 Divert Water Supply for Public Use		
9.13 Divert Surface Waters for Private Use		
9.14 Divert Subsurface/Percolating Water for Private Use		
9.15 Well Drilling	Approved	
9.16 Permanent Water Lowering		

PERMIT TYPE *(Use additional sheets if necessary)*	APPLICATION STATUS (Pending - Approved)	PROJECT #
9.17 Temporary Water Lowering		
9.18 Construct/Modify, Operate Public Potable Water Works		
9.19 Connection between an approved water supply and non-approved supply		
9.20 Sewer Systems: Collectors, Pump Station, etc		
9.21 Exemption from Sewer Ban		
9.22 New Jersey Pollution Discharge Elimination System (Specify)	DGW-pending	NJ0067199
9.23 Underground Storage Tanks	APPROVED	UST
9.24 Solid Waste Permits (Specify)		
9.25 Hazardous Waste Permits (Specify) GENERATOR	APPROVED	NJD0011482577
9.26 Air Quality Permits (Specify)	see attachment A	
9.27 Delaware and Raritan Canal Review Zone "Certificate of Approval"		
9.28 Pinelands Certificate		
9.29 Green Acres Program Review "Certificate of Approval" (Specify projects)		
9.30 Other State agencies' permits		
9.31 Local Permits		
9.33 Federal Permits RCRA		

10. Brief Description of the Proposed Project and Intended Use:

To obtain a valid New Jersey Pollutant Discharge Elimination System (NJPDES) permit to discharge to the surface water of the State of New Jersey for Cental Steel Drum.

11. I certify under penalty of law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties for submitting false, inaccurate or incomplete information, including fines and/or imprisonment.

N/A
Type: Name and Date

N/A
Signature of Applicant/Owner

N/A
Type: Position

N/A
Date

Alan Fischer 9/5/91
Type: Name and Date

Signature of Applicant/Operator

Vice President
Type: Position

9/5/91
Date

N/A
Type: Name and Date

N/A
Signature of Co-permittee*

N/A
Type: Position

N/A
Date

ENDORSEMENTS

Some permit applications require specific endorsements of owners, agents, municipalities, etc. Endorsements may be required for your permit.

Verify the need for endorsements in the "Requirements" section of the Standard Application Form CP #1 booklet or with the appropriate DEP agency.

A. PROPERTY OWNER'S CERTIFICATION*

I hereby certify that _____
Property Owner's Name

is the owner of the property upon which the proposed work is to be done. This endorsement is certification that the owner grants permission for the conduct of the proposed activity.

In addition, the aforementioned property owner shall certify:

1. Whether any work is to be done within an easement — Yes_____ No_____
(Initial) *(Initial)*

2. Whether any part of the entire project (i.e., pipeline, roadway, cable, transmission line, etc.) will be located within property belonging to the State of New Jersey — Yes_____ No_____
(Initial) *(Initial)*

_____

_____

_____
Type or Print Name and Address of Owner, if different from Item 1 on Page 1

_____
Date

_____
Signature of Owner

* *Not required for Sewer System Application (Treatment Works Approvals)*

B. **APPLICANT'S AGENT**

I, the Applicant/Owner N/A or Applicant/Operator (when the owner of the facility and the operator of the facility are distinct parties)_____ or Co-permittee (when the Co-permittee is a local governmental unit)_____ authorize to act as my agent/representative in all matters pertaining to my application the following person:

Name_____ Phone_____

Address_____ County_____

City or Town_____ State_____ Zip Code_____

Occupation/Profession_____

_____
(Signature of Applicant/Owner)

_____
(Signature of Applicant/Operator)

_____
*(Signature of Co-permittee)**

AGENT'S CERTIFICATION

Sworn before me
this_____day of
_____19____

_____
Notary Public

I agree to serve as agent for the above-mentioned applicant

_____
(Signature of Agent)

C. **PROPER CONSTRUCTION AND OPERATION CLAUSE** N/A
(Sewer Extensions, Treatment Works Approval, Water Works, Underground Storage Tanks)

I, the Applicant/Owner_____ or Applicant/Operator (when the owner of the facility and the operator of the facility are distinct parties)_____ or Co-permittee (when the Co-permittee is a local governmental unit)_____ agree that the works will be properly constructed and operated in accordance with the engineering plans and specifications, as approved, and the conditions under which approval is granted by the State Department of Environmental Protection.

_____
(Signature of Applicant/Owner)

_____
(Signature of Applicant/Operator)

_____
*(Signature of Co-permittee)**

* *Not required for Sewer System Application (Treatment Works Approvals)*

D. **STATEMENT OF PREPARER OF PLANS, SPECIFICATIONS, SURVEYOR'S OR ENGINEER'S REPORT** N/A

I hereby certify that the engineering plans, specifications and engineer's report applicable to this project comply with the current rules and regulations of the State Department of Environmental Protection with the exceptions as noted.

(Signature of Engineer)

Type: Name and Date

Position, Name of Firm

PROFESSION ENGINEER'S EMBOSSED SEAL

E. **OWNER'S COMPLIANCE WARRANT** (NJPDES ONLY)

I, the Applicant/Owner N/A or Applicant/Operator (when the owner of the facility and the operator of the facility are distinct parties) Alan Fischer or Co-permittee (when the Co-permittee is a local governmental entity) N/A, hereby agree that any treatment works constructed to meet the NPDES/NJPDES permit discharge limits will be properly constructed and operated to meet those limits. I also warrant that the discharge(s) will meet the effluent limitations as described in the NPDES/NJPDES permit, as issued.

N/A
(Date)

N/A
(Signature of Applicant/Owner)

9/5/91
(Date)

(Signature of Applicant/Operator)

N/A
(Date)

N/A
(Signature of Co-permittee)*

* *Not required for Treatment Works Approvals*

F. **PARTY RESPONSIBLE FOR THE CONSTRUCTION OF THE PROPOSED FACILITY**
(Sewer Extensions, Treatment Works Approvals, Underground Storage Tanks)

Name of Developer N/A

Phone _____

Address _____ County _____

City _____ State _____ Zip Code _____

Contact Person _____

ATTACHMENT B

REQUEST FOR APPLICANT/OWNER ENDORSEMENT

WILENTZ
GOLDMAN
& SPITZER
ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION

PETER J. HERZBERG
(908) 855-6484

90 Woodbridge Center Drive
P.O. Box 10
Woodbridge, NJ 07095-0958
(908) 636-8000
Fax (908) 855-6117

777 West Park Avenue
Oakhurst, NJ 07755
(908) 493-1000
Fax (908) 493-8387

111 John Street
Suite 2300
New York, NY 10038
(212) 267-3091
Fax (212) 267-3828

Please reply to Woodbridge

J. CLABBY

2

September 10, 1991

Our file #103304.001

Lila Woodsmith, Esq.
169 King Street
Armonk, New York 10504

Re: Central Steel Drum
NJPDES/DSW Permit Application

Dear Lila:

As discussed, I am herewith enclosing Central Steel Drum's application to obtain an NJPDES/DSW Permit. There is a requirement that the owner sign the application form. I have placed two yellow "post-its" in the places that require information regarding the owner and the signature of the owner. I would appreciate if you could attend to this matter as soon as possible.

Very truly yours,

Peter J. Herzberg/lk
Peter J. Herzberg

PJH/lk
Enclosure

ATTACHMENT C

REQUEST FOR MUNICIPALITY AND SEWERAGE AUTHORITY ENDORSEMENTS

JM Sorge, Inc.

50 County Line Road, Somerville, NJ 08876 • (908) 218-0066
FAX (908) 218-9185

Certified Mail - Return Receipt Requested

September 11, 1991

Mr. Al Zach
Director - Engineering Department
City of Newark
920 Broad Street
Newark, NJ 07102

Re: Central Steel Drum Co.
704 Doremus Avenue
Newark, NJ
Form WQM-003 Endorsement "A" for
NJPDES DSW Permit

Dear Mr. Zach:

The purpose of this letter is to inform you that Central Steel Drum Company is applying for a New Jersey Pollutant Discharge Elimination System (NJPDES), Discharge to Surface Water (DSW) permit for storm water runoff at the above-referenced site. Since the general topography of the site area will result in a runoff of untreated storm water to the surface waters of the State, (DSW), NJPDES regulation 7:14A-2.1(K), Item 2, requires an endorsement in the form of a signature by the appropriate governing body. This endorsement confirms that the "project as proposed is in conformance with the requirements of all municipal ordinances" and is accepted by the municipality. Please note that no construction, etc., has been proposed. The "project" is simply permitting the surficial runoff of storm water to a drainage ditch which extends from the site to the west, beneath Doremus Avenue, eventually entering Newark Bay.

Attached is a complete copy (less endorsements and EPA Form 2C) of the NJPDES, DSW Permit Application for Central Steel Drum. Once you have reviewed this information, please sign the enclosed Endorsement "A" of Form WQM-003, and return the original form to my attention at the address above, so that it may be forwarded to the New Jersey Department of Environmental Protection (NJDEP) as part of the NJPDES, DSW application.

Should you have any questions regarding this matter, please do not hesitate to contact me at (908) 218-0066.

Very truly yours,

James M. Clabby
Project Manager

JMC/nk
Enclosure

P 266 204 238

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Zach	
Street and No. City of Newark	
P.O., State and ZIP Code 920 Broad St Newark NJ 07102	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, June 1985

U.S.G.P.O. 1988-234-555

JM Sorge, Inc.

50 County Line Road, Somerville, NJ 08876 • (908) 218-0066
FAX (908) 218-9185

Certified Mail - Return Receipt Requested

September 11, 1991

Mr. Carmen Della Pia
Passaic Valley Sewerage Authority
600 Wilson Avenue
Newark, NJ 07105

Re: Central Steel Drum Co.
704 Doremus Avenue
Newark, New Jersey 07105
Form WQM-003 Endorsement "C" for
NJPDES DSW Permit

Dear Mr. Della Pia:

The purpose of this letter is to inform you that Central Steel Drum Company is applying for a New Jersey Pollutant Discharge Elimination System (NJPDES) Discharge to Surface Water (DSW) Permit for storm water runoff at the above-referenced site. Since the general topography of the site area will result in a runoff of untreated storm water to the surface waters of the State, (DSW), NJPDES regulation 7:14A-2.1(K), Item 2, requires an endorsement in the form of a signature by the Sewerage Agency in which the project is located. This endorsement confirms that the project is in conformance with the applicable 201 facilities ordinances and is accepted and approved as proposed. This letter is not to pursue permission to discharge to your treatment facility, only to notify you that a drainage source DSW is being permitted within your service area. Please note, that no construction, etc., has been proposed. The "project" is simply permitting the surficial runoff of storm water to a drainage ditch which extends from the site to the west, beneath Doremus Avenue, eventually entering Newark Bay.

Attached is a complete copy (less endorsements and EPA Form 2C) of the NJPDES, DSW Permit Application for Central Steel Drum. Included in the application is a site map illustrating the site drainage pattern and the discharge point. Once you have reviewed this information, please sign the enclosed Endorsement "C" of Form WSM-003, and return the original form to my attention at the address above, so that it may be forwarded to the New Jersey Department of Environmental Protection (NJDEP) as part of the NJPDES, DSW application.

Should you have any questions regarding this matter, please do not hesitate to contact me at (908) 218-0066.

Very truly yours,

James M. Clabby
Project Manger

JMC/nk

Enclosure

P 266 204 239

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

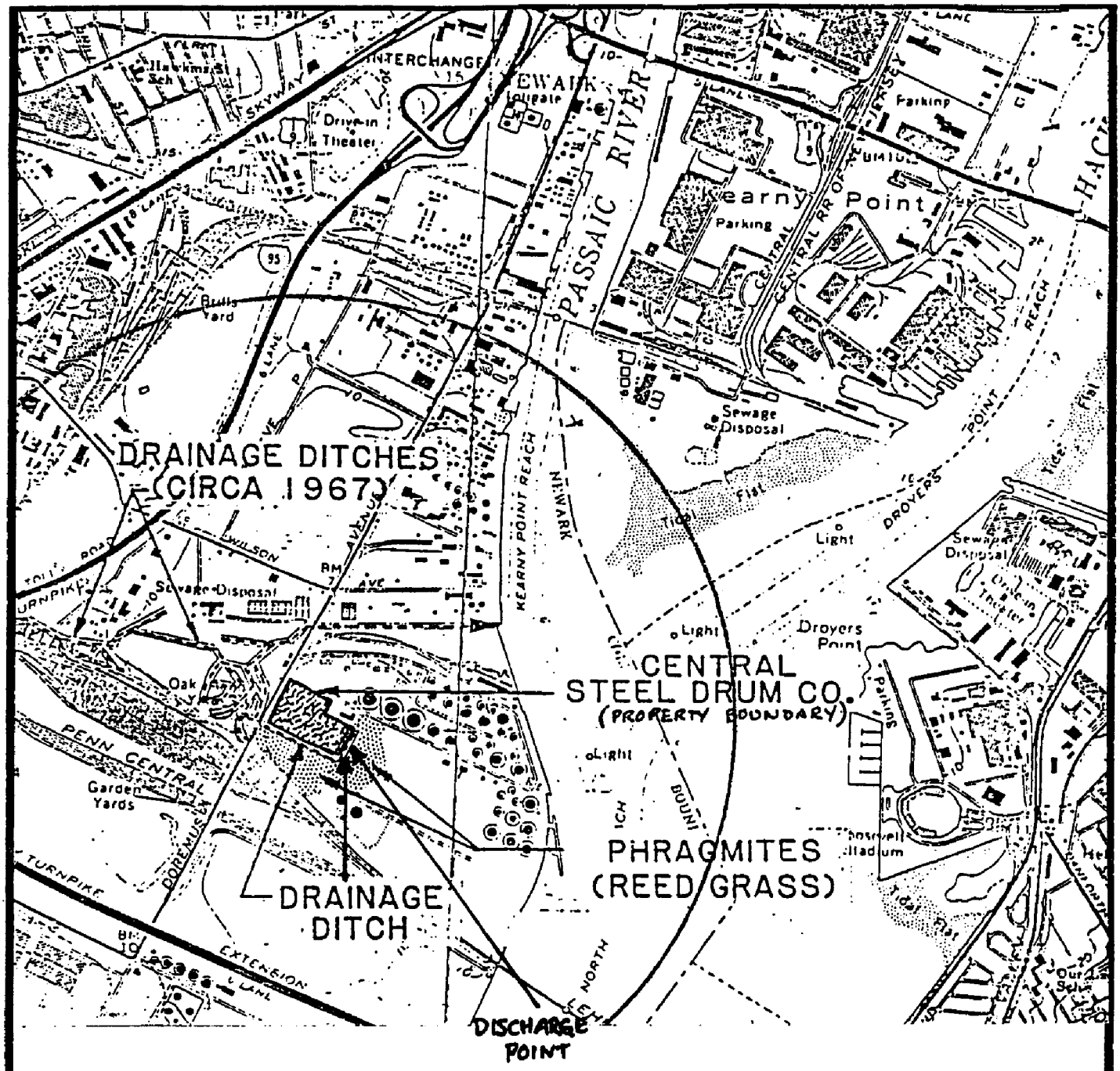
Sent to Mr Carmen Della Pia	
Street and No. Passaic Valley Sewerage 600 Wilson Ave.	
P.O., State and ZIP Code Newark, NJ 07105	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date SEP 1991 USPS	

PS Form 3800, June 1985

ATTACHMENT D

FIGURE 1 - U.S.G.S. SITE LOCATION MAP

FIGURE 2 - FACILITY SITE PLAN



SCALE: 1"=2000'-0"

1000 0 2000 4000

SCALE IN FEET

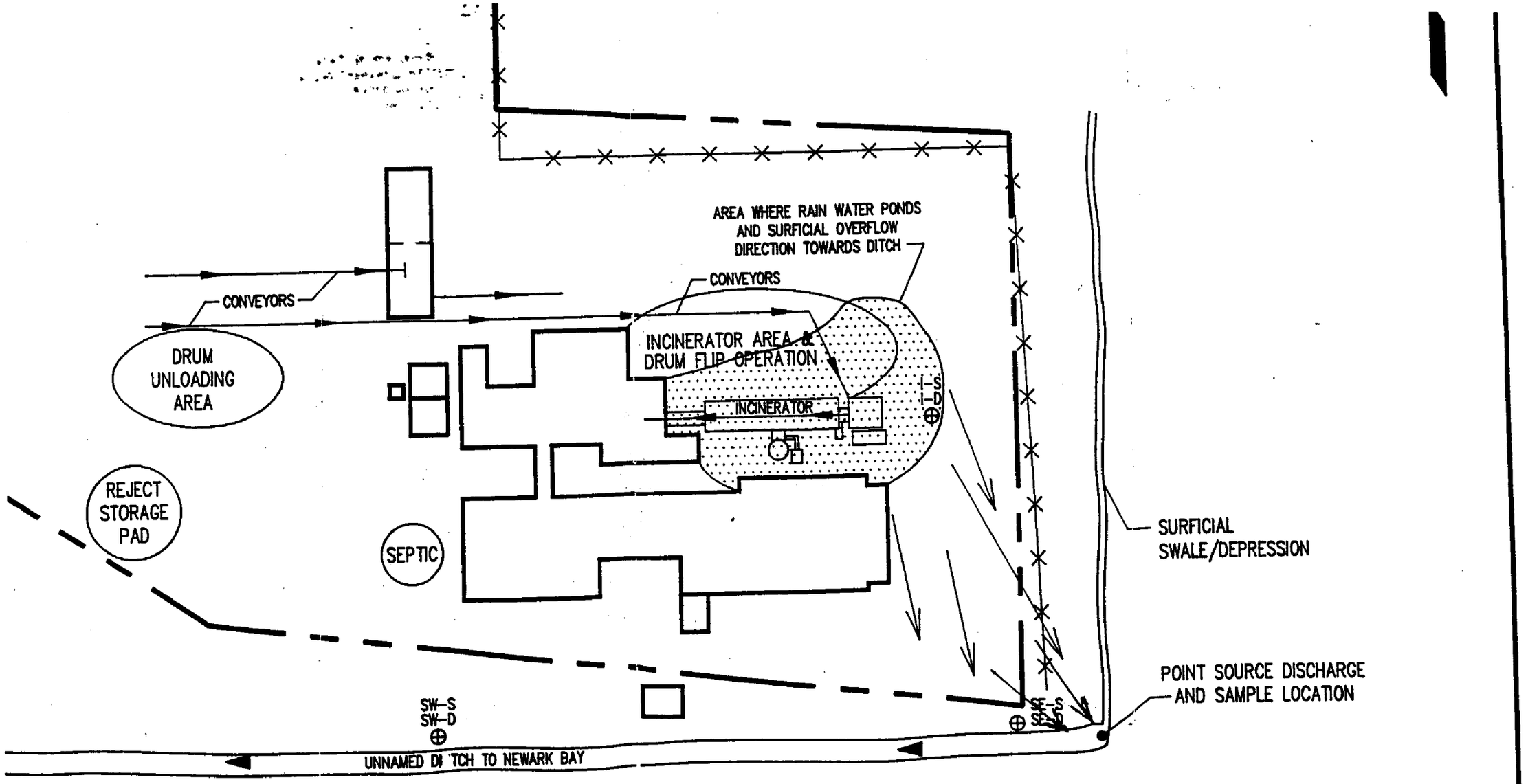
SOURCE:

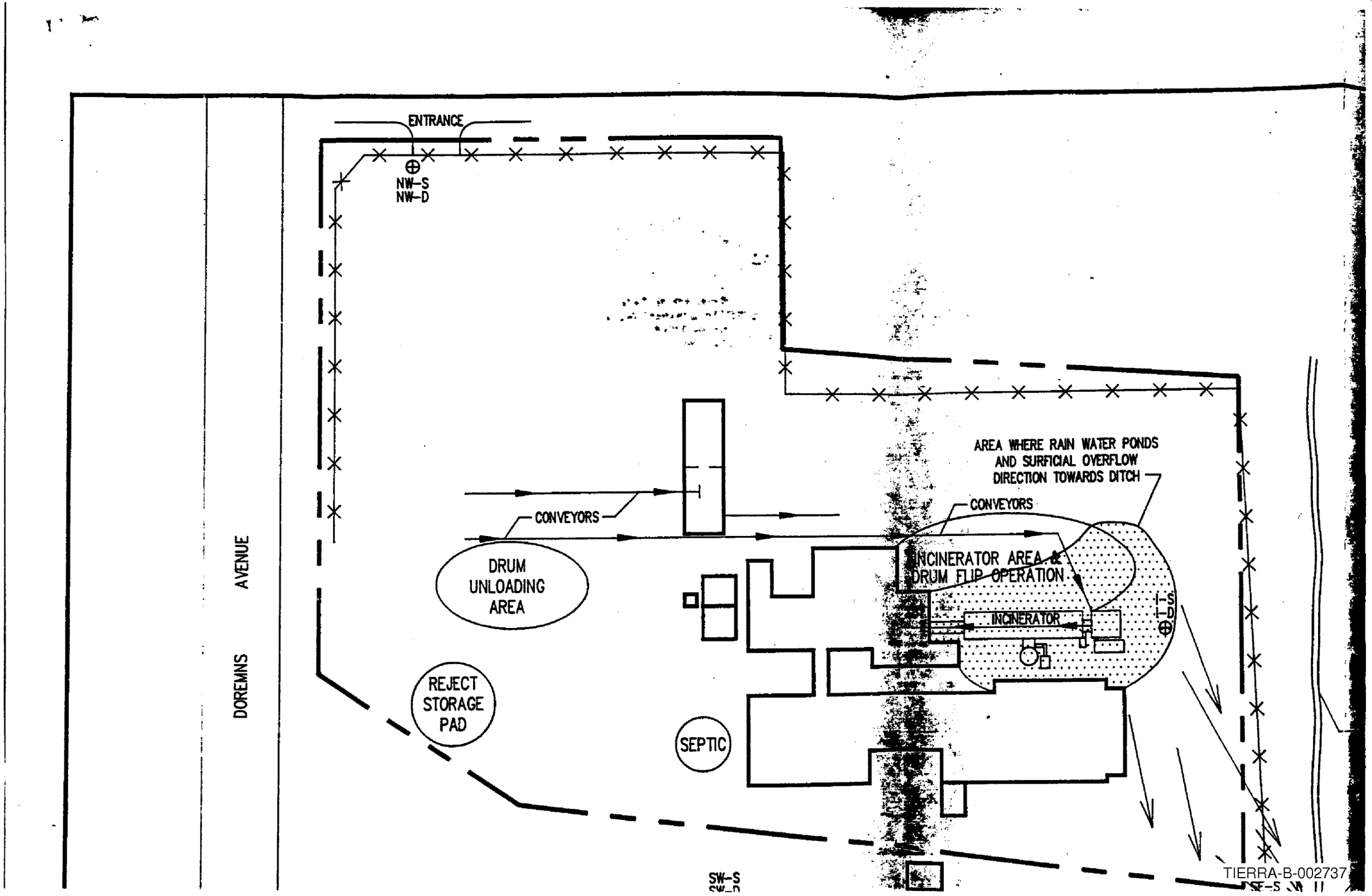
U.S.G.S. 7.5
MINUTE SERIES
ELIZABETH AND
JERSEY CITY
QUADRANGLE - NJ

JM SORGE, INC.	CENTRAL STEEL DRUM

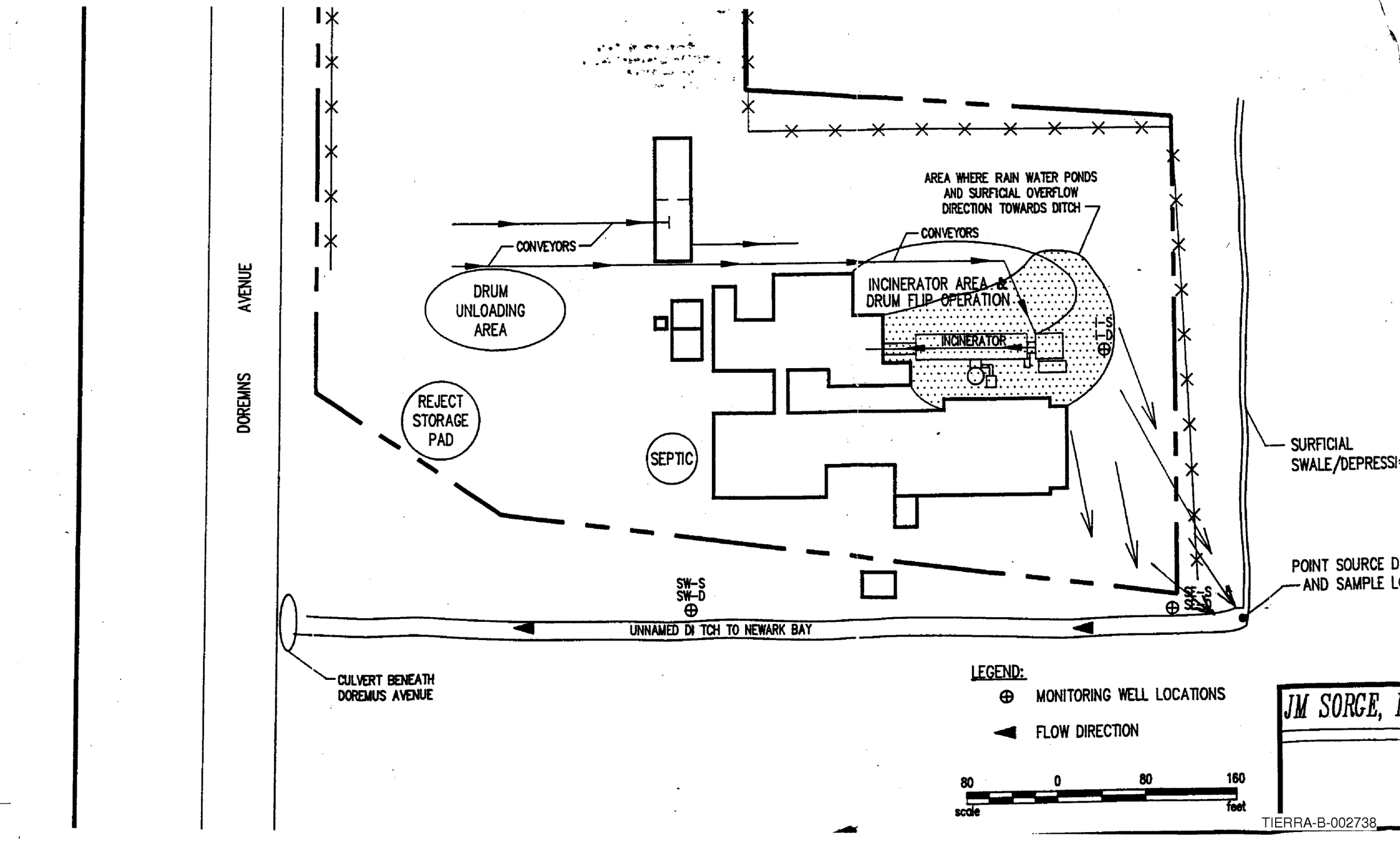
SITE LOCATION MAP

FIGURE 1





TIERRA-B-002737



FILE

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
METRO BUREAU OF REGIONAL ENFORCEMENT
2 BABCOCK PLACE
WEST ORANGE, NEW JERSEY 07052

(201) 669-3900

November 5, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Neil Fischer, Secretary - Treasurer
Central Steel Drum Company
704 Doremus Avenue
Newark, NJ 07105

Re: The New Jersey Pollutant Discharge Elimination System
Central Steel Drum Company
Newark/Essex County

Dear Mr. Fisher:

An inspection of your facility was conducted on September 9, 1990 by a representative of this Division. During this inspection, it was learned that wash water from the drum cleaning operation and waste residue around the incinerator area are ultimately discharged to the surface waters of the State. This activity is governed by the New Jersey Pollutant Discharge Elimination System (NJPDES) Regulations, N.J.A.C. 7:14A-1 et seq. These regulations state: "No person shall discharge any pollutant except in conformity with a valid NJPDES permit." Our records indicate no such permit exists for your facility.

You are therefore directed to obtain a NJPDES permit for the discharge at your facility within thirty (30) days of receipt of this correspondence. Permit application forms can be obtained by contacting:

Mr. George Caporale, Chief
Bureau of Information Systems
Management Services Element
Division of Water Resources
P.O. Box CN-029
Trenton, NJ 08625

Any questions concerning the completion of the application should be addressed to Mr. Caporale or the BIS staff, who may be reached at (609) 984-4425. The completed application must be sent to Mr. Caporale, with a copy of the cover letter to this writer.

Failure to comply with this directive may result in further enforcement action by this office, including the imposition of penalties, pursuant to N.J.S.A. 58:10A-10. Therefore, kindly devote your full attention to this matter. If you have any questions concerning this directive, please contact Theophilus N. Ashie at (201) 669-3900.

Very truly yours,

Janet Budesa Carroll
Acting Supervisor
Surface Water and
Sewer System Enforcement
Metro Bureau of
Regional Enforcement

E29:G25

c: Mr. George Caporale, BIS
Dr. Adewale Troutman, H.O.
Theodore Hayes, BGMDC

State of New Jersey
Department of Environmental Protection
Bureau of Field Operations - Case Assignment Section
P. O. Box 434, Trenton, NJ 08625-0434
(609) 292-2943

Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

Paul Butler
City of Newark
Department of Engineering
City Hall
920 Broad Street
Newark, New Jersey 07102

JUN 15 1998

Re: 843-871 Delancy Street, Newark, Essex County
Block: 5074 Lot: 1
Incident #: 98-6-10-0020-44

Dear Mr. Butler:

The purpose of this letter is to provide you with written notification that Department of Environmental Protection has reviewed the Memorandum of Agreement application for the above referenced site and determined that it is administratively complete. This letter constitutes the Memorandum of Agreement by rule pursuant to N.J.A.C. 7:26C-3.3. The date of this letter is considered the effective date of the Memorandum of Agreement.

Within thirty (30) calendar days from the effective date of the Memorandum of Agreement, you are required to submit to the Department a schedule of implementation of those activities and/or phases enumerated in the Memorandum of Agreement. If all remedial activities required by this Memorandum of Agreement are completed, then please submit a schedule of when required documents will be submitted. This schedule is needed to assure that Department personnel can be appropriately assigned to this matter to ensure timely response by the Department.

Until a case manager is assigned, your contact for the Department concerning all matters addressed by the Memorandum of Agreement is Bruce Venner. Please contact Bruce Venner at 609-633-0719 if you have any questions.

All reports should be sent to :

New Jersey Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
Bureau of Federal Case Management
401 East State Street – P.O. Box 028
Trenton, New Jersey 08625-0028

Attention:Bruce Venner, Bureau Chief

Enclosed is a copy of the certification that must accompany all submittals to the Department.

Sincerely,

Mark J. Pedersen, Section Chief
Case Assignment Section

Enclosures
C: Newark Health Department

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SITE REMEDIATION PROGRAM

MEMORANDUM OF AGREEMENT APPLICATION FOR NON-RESIDENTIAL PROPERTIES

PLEASE TYPE OR PRINT

DATE December 30, 1997

A. Current Property Use: Agricultural _____ Industrial _____ Commercial _____ Undeveloped _____ Other Abandoned

B. Site Name Central Steel Drum
Street Address 843-871 Delancy Street
Newark Zip Code 07105
Municipality Newark County Essex

Tax Block and Lot Number(s) Block 5074, Lot 1

Latitude _____ Longitude _____
Acreage 8.5
Geographic Boundaries Doremus Avenue and Delancy Street
EPA ID # (if applicable) CERCLIS No. NJD011482577

C. Who will be executing this Agreement? (if different than Question B)

Name City of Newark
Affiliation Owner
Address 920 Broad Street
City Newark State NJ Zip Code 07102
State of Incorporation NA Corp. Status NA
Telephone # 973-733-7994

D. Select which phase(s) of the remediation process are to be performed and what document(s) are to be submitted pursuant to the MOA being requested.

REMEDIAL PHASE	DOCUMENTS TO BE SUBMITTED
[ ] Preliminary Assessment	[ ] Preliminary Assessment Report
[ ] Site Investigation	[ ] Site Investigation Report
[X] Remediation Investigation	[X] Remedial Investigation Work Plan
[ ] Remedial Action	[X] Remedial Investigation Report
	[ ] Remedial Action Selection Report
	[ ] Remedial Action Workplan
	[ ] Remedial Action Report

E. Current Property Owner(s):
Name(s) Same as Part C
Firm _____ Telephone # _____
Street Address _____
Municipality _____
State _____ Zip Code _____

RECEIVED
MAR - 9 1998

F. Current Business Operator(s):
Name(s) N/A
Firm _____ Telephone # _____
Street Address _____
Municipality _____
State _____ Zip Code _____

G. Current Business Owner(s) (if different than question Part E or F):
Name(s) N/A
Firm _____ Telephone # _____
Street Address _____
Municipality _____
State _____ Zip Code _____

H. Provide the information requested below on the previous owners of the site and the entities who operated at the site.

Name	Owner or Operator	From	To
Central Steel Drum	Owner/Operator	1952	1991
International Printing Ink	Owner/Operator		1952

I. For those former Owner(s) and/or Operator(s) identified above (in paragraph H), give a brief discussion of all operations at the site, including but not limited to types of operations, materials used, waste generated and waste disposal techniques.
The site has been used for the storage, cleaning, and reclaiming of steel drums. Illegal dumping of drummed materials is possible. A sludge burner was present on-site.

J. Are there currently or have there ever been any notices on the deed which constitute a Declaration of Environmental Restriction (DER) pursuant to N.J.A.C. 7:26E-1 et seq. ?

Yes _____ No _____ Unknown X

If yes, please state the name of the site as it was identified in the DER, the address, lot and block and EP ID number (if applicable) associated with the site.

K. Are there currently, or have there ever been, any hazardous substances as defined by N.J.A.C. 7:1E-1, *et seq.*, used, generated, treated, stored, disposed or discharged at the site? (i.e., Fuel Oil, Gasoline)
Yes X No _____ Various hazardous substances.

L. Are there currently, or have there ever been, any hazardous wastes as defined by N.J.A.C. 7:26-8, *et seq.*, used, generated, treated, stored and disposed or discharged at the site?
Yes X No _____ Unknown _____ Various hazardous wastes.

M. Are there currently, or have there ever been, any above or below ground storage tanks at the site?
Yes X No _____ Unknown _____

N. Did the discharge impact groundwater?
Yes X No _____ Unknown _____

O. What are the current operations at the site?
The site is currently abandoned. EPA completed removal actions in November of 1997. These actions included the staging, testing and removal of the drums; removal of two underground storage tanks; and general site cleanup.

P. What are the intended future uses of the site?
Brownfields Redevelopment

Q. Describe briefly the major types of contaminants found at the site and what media they affect.
Soils contaminated with various organic and inorganic contaminants. Groundwater found at a depth of less than 4 feet below the ground surface is likely to be affected. However, no comprehensive groundwater investigations on the site were conducted.

R. Describe in detail how the contamination came to exist at the site. For example, were there past spills, landfill operations, industrial septic systems, USTs, deposition of fill material, etc.?
Contamination occurred from past operations on the site including disposal on site of drum residues and ash, spills from drum handling, and poor housekeeping processes.

S. List any civil/criminal actions taken against the owner/operator, managers or officials associated with the site for violations of any environmental laws or statutes.

Check here if no violations or alleged violation [ ]
Date of action March 28, 1982
Section of law or statute violated Section 3008 of the Solid Waste Disposal Act
Type of enforcement action Notice of Prosecution
Description of violation Complaints of sloppy operations, illegal practices with respect to hazardous waste handling, and odors from the incinerator.

How was the violation or alleged violation resolved?
The violation was not fully resolved, the owners later abandoned the site.

T. List all permits currently held by the applicant for the site. (NJPDES, RCRA, etc.)
None

U. Has a Hazardous Discharge Site Remediation Fund Grant or Loan Application been filed with the Department?

Yes X No _____

V. Has a loan/grant application pursuant to the Underground Storage Tank Finance Act been filed with the Department?

Yes _____ No X

W. Is the site located in a Neighborhood Empowerment Zone as defined in P.L.1996, c.62 (New Jersey Redevelopment Act) ?

Yes _____ No _____ Unknown X

X. Who will be the contact for all matters of this application?

Name Paul Butler Title Project Manager
Affiliation Employee of City of Newark
Address 920 Broad Street
City/Town Newark State NJ Zip Code 07102
Phone 973-733-7994

Y. Is the site currently, or has it ever been, under the oversight of any other program within the Department of Environmental Protection?

Yes X No _____

If Yes, explain: An administrative Consent Order was drafted on April 27, 1982. No action or compliance was taken by the former owner.

The following certification shall be signed by the highest ranking individual with overall legal responsibility for implementing the remediation of the site, but shall not include contractors or consultants:

1. for a corporation, by a principal executive officer of at least the level of vice president;
2. for a partnership or sole proprietorship, by a general partner or the proprietary, respectively; or;
3. for a municipality, State, Federal or other public agency, by either a principal executive officer or ranking elected official;

The certification may also be signed by a duly authorized representative of those persons described above. A person is a duly authorized representative only if:

1. The authorization is made in writing by a person described above:

2. The authorization specifies either an individual or a position having a responsibility for the overall operation of the site or activity, such as the position of plant manager, or a superintendent or person of equivalent responsibility (a duly authorized representative may thus be either a named individual or an individual occupying a named position);

3. The written authorization is submitted to the Department; and

4. If the authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of this subsection shall be submitted to the Department prior to or together with any reports, information or applications to be signed by an authorized representative.

" I certify that I am fully aware of the requirements of N.J.A.C. 7:26C-3, specifically as it pertains to the memorandum of agreement by rule. Further, I agree to pay the Department's oversight costs for the Department review of any submissions pursuant to the memorandum of agreement until such time as I notify the Department that is no longer feasible or desirable for me to continue with the memorandum of agreement."

SIGNATORY

DATE: 1/6/98 BY: _____
Signature

Howard S. Lazarus, Director
Printed Full Name Signed Above

DATE: 1/6/98 BY: _____
Notary Signature

YOLANDA REID
NOTARY PUBLIC OF NEW JERSEY
I.D. # 2088715
My Commission Expires Nov. 27, 1999

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

DATE: 6/12/98 BY: _____
Mark Pedersen, Section Chief
DRPSR, Case Assignment Section

The Department will review the application and will respond in writing, within thirty calendar days from receipt of the application, as to whether the application is administratively complete or not. If the application is incomplete the deficiencies shall be listed. If the application is complete, the applicant will be deemed to have entered into an Agreement by rule pursuant to N.J.A.C. 7:26C-3.3.

103- DEED BARGAIN AND SALE (Covenant as to Grantor's Acts) IND. TO IND. OR CORP. -- Plain Language ABG V87-1

DEED

Prepared by: (Print signer's name below signature)

BRIAN J. HALLIGAN

This Deed is made on October 26 1988

BETWEEN

Jane Ratner Mattson and Marian Ratner Abrams as co-executrices of the Last Will & Testament of Mollie Ratner, Deceased

whose address is 25 Hardscrabble Hill, Chappaqua, New York and 10810 Missouri Ave., Los Angeles, Ca., respectively referred to as the Grantor,

AND

Jane Ratner Mattson, Individual Co-Tenant and

Marian Ratner Abrams, Individual Co-Tenant

whose post office address is 25 Hardscrabble Hill, Chappaqua, N. Y. and 10810 Missouri Ave., Los Angeles, Ca., respectively referred to as the Grantee.

The words "Grantor" and "Grantee" shall mean all Grantors and all Grantees listed above.

Transfer of Ownership. The Grantor grants and conveys (transfers ownership of) the property described below to the Grantee. This transfer is made for the sum of One Dollar ($1.00)

The Grantor acknowledges receipt of this money.

Tax Map Reference. (N.J.S.A. 46:15-2.1) Municipality of Newark
Block No. 5074 Lot No. 1 Account No.

☐ No property tax identification number is available on the date of this deed. (Check box if applicable.)

Property. The property consists of the* land and all the buildings and structures on the land in the City of Newark
County of Essex and State of New Jersey. The legal description is:

* an undivided 33 1/3 % in

SEE ATTACHED SCHEDULE A

JAN 11 2 55 PM '89

BK 5060 PG 779

SCHEDULE A

BEGINNING at a pipe set in the easterly line of Bay Shore Connecting Railroad at its Interesection with the southerly line of Delancy Street; and from thence running south 33 degrees 03 minutes 30 seconds west along said easterly line of Bay Shore Connecting Railroad 611.61 feet to another pipe set in said easterly line of Bay Shore Connecting Railroad, and to the center line of Jasper Creek; thence along said center line of Jasper Creek south 32 degrees 17 minutes 30 seconds east 107.77 feet to a pipe; thence south 59 degrees 18 minutes east 40.70 feet to a pipe, and land now or formerly belonging to Emily R. McGregor; thence along said land north 44 degrees 21 minutes east 100.50 feet to a pipe set at a corner in the last mentioned land; thence along the same south 49 degrees 52 minutes 30 seconds east 774.70 feet; more or less, to a pipe and certain land (consisting of approximately forty-five acres) hitherto conveyed by Internation Inks, Inc. to L. A. Ault, Trustee, by deed dated May 29, 1928, and recorded in the Office of the Register of the County of Essex on June 6, 1928; thence along said last mentioned land north 33 degrees 5 minutes 30 seconds east 677.88 feet to a pipe set in said southerly line of said Delancy Street at a point which is distant 923.35 feet on a course south 56 degrees 54 minutes 30 seconds east from the point of beginning; and thence along said southerly line of Delancy Street north 56 degrees 54 minutes 30 seconds west 923.35 feet to the easterly line of Bay Shore Connecting Railroad at the point of BEGINNING.

EXCEPTING, however, all that certain tract or parcel of land situate, lying and being in the City of Newark, in the County of Essex and State of New Jersey.

BEGINNING at a point in the easterly right-of-way line of the Bay Shore Connecting Railroad, said point being distant south 56 degrees 54 minutes 30 seconds east 50 feet from the intersection of the easterly line of Doremus Avenue and the southerly line of Delancy Street measured along said southerly line of Delancy Street, and south 33 degrees 03 minutes 30 seconds west 441.61 feet measured along said easterly right-of-way line of the Bay Shore Connecting Railroad; running thence south 33 degrees 03 minutes 30 seconds west still along said easterly right-of-way line of the Bay Shore Connecting Railroad 170 feet to a point; thence south 32 degrees 17 minutes 30 seconds east 107.77 feet to the point of intersection of lands formerly of Austen H. McGregor Estate, Inc.; thence south 59 degrees 18 minutes east along said lands fromerly of Austen H. McGregor Estate, Inc., 40.70 feet; thence north 44 degrees 21 minutes east 100.50 feet still along lands formerly of Austen H. McGregor Estate, Inc. to a point; thence north 20 degrees 59 minutes 34 seconds west 195.91 feet to the point of place of Beginning. *

BEING the same premises conveyed by Dore RealtyCo., Inc. to Abbie Greenberg, Mollie Ratner, Dorothy Greenberg and Bessie Baron by deed dated July 22, 1966 and recorded on July 26, 1966 in the Office of the Register of Essex County at Deed Book 4183, Page 233.

BEING the same premises of which Abbie Greenberg and Gertrude Greenberg transferred their 25% interest thereof to Bessie Baron, Mollie Ratner and Dorothy Greenberg by Deed dated August 30, 1968 and recorded September 3, 1968 in the Office of the Essex County Register, Deed Book 4284, Page 883.

* AND EXCEPTING all that certain tract or parcel of land and premises hereinafter more particularly described, situate, lying and being in the City of Newark, in the County of Essex, as follows:

BEGINNING at a point in the south line of Delancy Street therein distant 388.35 feet easterly from the intersection of same and the east right-of-way line of the Bay Shore Connecting Railroad, said intersection being in the south line of Delancy Street therein distant 50.00 feet easterly from the intersection of the south line of Delancy Street and the east line of Doremus Avenue; thence along Delancy Street south 56 degrees 54 minutes 30 seconds East; 535.00 feet; thence 33 degrees 05 minutes 30 seconds West 677.88 feet; thence North 47 degrees 52 minutes 30 seconds West, 162.01 feet; thence North 33 degrees 05 minutes 30 seconds East, 432.44 feet; thence North 56 degrees 54 minutes 30 seconds West, 375.00 feet; thence North 33 degrees 05 minutes 30 seconds East, 200.00 feet to the south line of Delancy Street and point of beginning.

The above description is according to a survey made May 1, 1952, by Francis J. A. Hoare, Engineer and Surveyor, Newark, N. J.

Subject to any state of facts an accurate survey may show.

SUBJECT, however, to a certain easement granted to John Maneely Company by Philip Ruxton, Incorporated, a New York Corporation, by Indenture dated August 5, 1947, and recorded in the Register's Office of the County of Essex on August 13, 1947, in Deed Book K110 for said County on pages 66, 68, for a single tract connection to the Bay Shore Connecting Railroad in and over a certain right-of-way situate in the City of Newark, County of Essex, State of New Jersey and extending ten (10) feet on either side of the center line of said right-of-way, which center line is described as follows:

BK5060PG 781

BEGINNING at a point in the easterly line of Bay Shore Connecting Railroad distant southerly ninety-three and ninety one-hundredths (93.90) feet from the intersection of the southerly line of Delancy Street with the easterly line of Bay Shore Connecting Railroad; thence northeasterly on a curve to the right with a radius of two hundred and eighty-seven and ninety one-hundredths (287.90) feet a distance of one hundred and one and nineteen one-hundredths (101.19) feet to a point in the southerly line of Delancy Street distant easterly thirty-six and thirty one-hundredths (36.30) feet from the intersection of the easterly line of Bay Shore Connection Railroad with the southerly line of Delancy Street.

10118sC

Promises by Grantor. The Grantor promises that the Grantor has done no act to encumber the property. This promise is called a "covenant as to grantor's acts" (N.J.S.A. 46:4-6). This promise means that the Grantor has not allowed anyone else to obtain any legal rights which affect the property (such as by making a mortgage or allowing a judgment to be entered against the Grantor).

Signatures. The Grantor signs this Deed as of the date at the top of the first page.

Witnessed by:

x Jane Ratner Mattson (Seal)
Jane Ratner Mattson, Co-Executrix

x Marian Ratner Abrams (Seal)
Marian Ratner Abrams, Co-Executrix

CALIFORNIA
STATE OF ~~NEW JERSEY~~, COUNTY OF LOS ANGELES SS.:

I CERTIFY that on October 19, 1988,

Marian Ratner Abrams personally came before me and acknowledged under oath, to my satisfaction, that this person (or if more than one, each person):

(a) is named in and personally signed this Deed;
(b) signed, sealed and delivered this Deed as his or her act and deed; and
(c) made this Deed for $ 1.00 as the full and actual consideration paid or to be paid for the transfer of title. (Such consideration is defined in N.J.S.A. 46:15-5.)

x [signature]
Notary Public

OFFICIAL SEAL
Phillip J. Gomez
NOTARY PUBLIC-CALIFORNIA
PRINCIPAL OFFICE IN
LOS ANGELES COUNTY
My Commission Expires May 26, 1991

M5060PG 788

17144

THIS AGREEMENT made this 15th day of September, 1968 by and between MOLLIE RATNER, residing at 135 Ocean Parkway, Brooklyn, New York, BESSIE BARON, residing at 1299 Wellington Avenue, West Englewood, New Jersey and DOROTHY GREENBERG, residing at 6131 La Gorce Drive, Miami Beach, Florida, (hereinafter sometimes called the "Wives") and their respective husbands, namely MURRAY RATNER, LEO BARON and JACK GREENBERG.

WITNESSETH:

WHEREAS the Wives are owners, as tenants in common, each having a one-third interest of the premises known as 704 Doremus Avenue, Newark, New Jersey, and

WHEREAS Dore Realty Co., Inc., the predecessor in title of the Wives, as landlord, entered into a written lease of the said property with Abbie Greenberg, as tenant, under date of June 6, 1966, thereafter assigned by Abbie Greenberg to Central Steel Drum Co., Inc., for a term of ten years at the net net annual rent of $42000 payable at the rate of $3500 monthly, with a right or privilege of renewal for an additional ten years at a net net rent of $36,000 per year payable at the rate of $3000 monthly, and

WHEREAS it is the intent and purpose of the parties hereto that they, and their heirs and successors in the event of the death of any of the parties hereto shall continue to receive said rents and income during the period of the said lease and any aforesaid renewal thereof, and

WHEREAS the parties are desirous that no sale or dis-

position of the said real property, by partition or by any other means, shall be made by the parties during the term of the said lease or any renewal thereof,

NOW, THEREFORE, in consideration of the sum of One ($1.00) Dollar each to the other in hand paid and in consideration of the mutual promises herein contained, the parties agree as follows:

1. The parties hereby incorporate by reference, as their mutual agreement and understanding, the recitals hereinabove set forth.

2. The parties agree, for themselves, their heirs, successors and assigns, that during the term of the aforesaid lease of the premises described above, and during the term of any renewal thereof, they will not sell, assign or otherwise dispose of, by partition, sale or any other means, their respective interests in the said premises known as 704 Doremus Avenue, Newark, New Jersey.

3. The parties hereby waive, for the term or terms aforesaid, any and all rights which they, or any of them, may have to demand or sue for partition of the said premises or to institute any proceeding in law or equity which would disturb the parties herein of their respective rights or interests as tenants in common of the aforesaid premises, or of their rights and interests in the rents and income of said premises.

4. This agreement may be modified, superseded or revoked only by a writing executed and acknowledged by all of the

parties hereto in the form required for recording deeds in the State of New Jersey.

5. This agreement, and all of the terms hereof shall be binding upon the parties hereto and upon their respective heirs, successors, executors, administrators and assigns.

IN WITNESS WHEREOF the parties have hereunto set their hands and seals all of the day and year first above written.

MOLLIE RATNER (L.S.)

BESSIE BARON (L.S.)

DOROTHY GREENBERG (L.S.)

MURRAY RATNER (L.S.)

LEO BARON (L.S.)

JACK GREENBERG (L.S.)

HAZARDOUS WASTE INVESTIGATION

Inspector: Mike Nalbone
Date: 1-29-80
Location: Central Steel Drum

St: 704 Doremus Ave.

Town: Newark

County: Essex

Lot: 2

Block: 5074

Origin of Complaint: Anonymous

Complaint: Drum reclaimer burying waste in back of property.

Follow-up report on investigation in Nov. 1979

Findings:

On Jan. 29, 1979, I made a follow-up investigation at Central Steel Drum Company to ascertain information on their disposal of incinerator ash. I spoke with Mr. Alan Fischer assistant manager of Central Steel Drum. I asked Mr. Fischer what the company did with its incinerator ash and how much accumulated a day. I was told that the company uses the ash to fill pot holes on the companys grounds. It was also used as a fill material at the rear of the property. Mr. Fischer said that since this area was low and flooding occurs often, the rear of the property was being filled in to prevent this from happening in the future. He indicated that the company accumulates approximately one 55 gallon drum a day.

I noted during my investigation two (2) piles of incinerator ash located on the fill site which were still smoldering. (see area (A) on attached sketch) I requested that these two piles of incinerator ash be cleaned up and put in a container immediately. I indicated to Mr. Fischer that this was hazardous waste which should go to a special waste facility and not landfilled. Mr. Fischer disagreed with me indicating that according to the manufacturer of the incinerator after the material was burned it was no longer hazardous. I then indicated I would remain on the site untill the incinerator ash was picked up and put into a container. Mr. Fischer explained to me that he would clean up the ash from the fill site and place it in the roll off container being rented from Fiore & Sons. He also said that all the incinerator ash accumulated in the future will also be put in the roll off container untill an analysis is completed and a decision can be made whether its hazardous and non-hazardous.

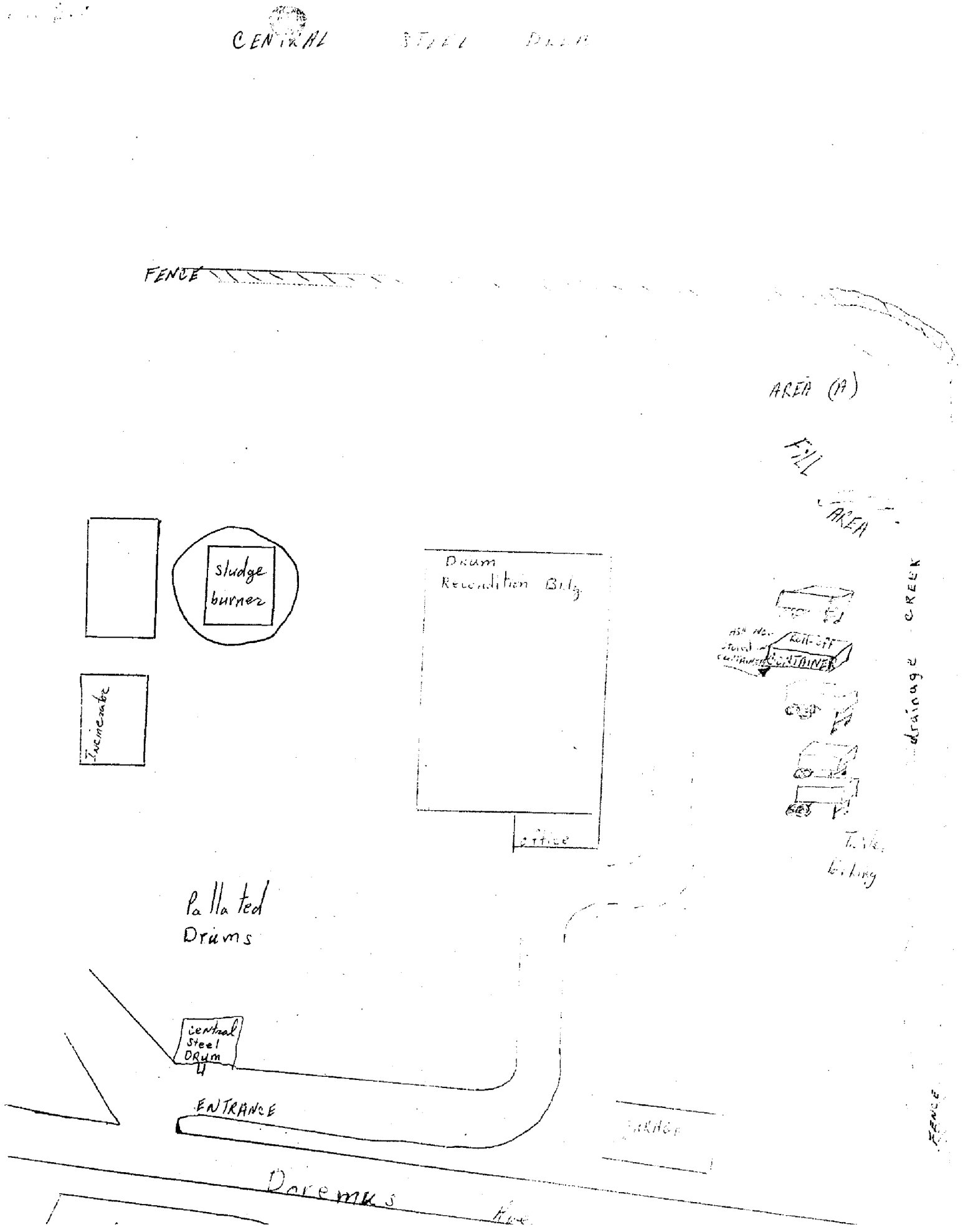
I checked for registration permits held by Central Steel Drum. The company had no SWA registration for landfilling special waste and it also had no SWA registration for landfilling solid waste. Their was a permit from Air Pollution Control certificate #042490 and DEP plant #05284 for the operation of the consumat C-225 (sludge burner incinerator). Although Mr. Fischer indicated that their was a registration permit for the second incinerator on site, their was no record of it on file.

I noted that the fill site designated as area (A) also consisted of drum lids, metal lid racks, wood pieces, scrap drums and paper. ((note* incinerator ash was noted mixed with dirt used in the fill area)). This area was approximately 80' by 30' and was in contact with the water in the drainage creek.

By three o'clock in the afternoon the clean up was completed and a sample was taken of the incinerator ash by myself and central steel drum for analysis. I indicated to Mr. Fischer that untill registration with our dept for landfilling has been approved as well as disposing of incinerator ash, all operation in this manner shall stop. Mr. Fischer requested the proper application forms for registering the company to legally carry out the disposal & landfilling of waste. I told him I would send out the necessary information to him.

The drums noted in a report on Nov. 27, 1979 were placed in the rear of the property because of poor house cleaning methods according to Mr. Fischer. The drums contained small amounts of material accumulated from other drums which were to be reconditioned. The material in these drums was incinerated according to Mr. Fischer. Mr. Fischer also said that the entire site is going thru a house cleaning operation to discontinue sloppy procedures on site.

11b



NEW J. SEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES

INVESTIGATION MEMORANDUM

Persons Conducting Investigation Theo Ashie

Complaint No./~~NJPDES No~~ 50-0790

Date of Investigation 9-17-90

Routing DW

Location of Incident CENTRAL STEEL DRUM COMPANY
704 DOREMUS AVENUE, NEWARK

Purpose of Investigation To investigate the discharge of pollutants to the surface waters of the State.

Persons Interviewed Neil Fischer, Secretary-Treasure
Central Steel Drum Company

Summary of Findings

The investigation revealed that there is a violation of N.J.S.A. 58:10A-1 et seq. at the facility. There was evidence of red paint spills around the incinerator area, and the spills ultimately ended up in the waters of the state. The drums used in the manufacturing process were not properly stored, and there were no retainer walls around the compressors, so that there was evidence of discharge to the ground from the compressors. Also random spillage of oil and paint was seen all around the storage area. A notice of violation was issued for unpermitted discharge to the waters of the state and for poor housekeeping.

See attached; Industrial Survey
Industrial Stormwater non-file forms.

BBG000069

TIERRA-B-002758

NEW J. SEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES

INVESTIGATION MEMORANDUM

Persons Conducting Investigation Theo Ashie

Complaint No. 50-0790

Date of Investigation 9-17-90

Routing DW

Location of Incident CENTRAL STEEL DRUM COMPANY 704 DOREMUS AVENUE, NEWARK

Purpose of Investigation To investigate the discharge of pollutants to the surface waters of the State.

Persons Interviewed Neil Fischer, Secretary-Treasurer Central Steel Drum Company

Summary of Findings

The investigation revealed that there is a violation of N.J.S.A. 58:10A-1 et seq. at the facility. There was evidence of red paint spills around the incinerator areas, and the spills ultimately ended up in the waters of the state. The drums used in the manufacturing process were not properly stored, and there were no retainer walls around the compressors, so that there was evidence of discharge to the ground from the compressors. Also random spillage of oil and paint was seen all around the storage area. A notice of violation was issued for unpermitted discharge to the waters of the state and for poor housekeeping.

See attached; Industrial Survey
Industrial Stormwater non-flex forms.

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
METRO BUREAU OF REGIONAL ENFORCEMENT
2 BABCOCK PLACE
WEST ORANGE, NEW JERSEY 07052

Short Form

INDUSTRIAL SURVEY

DATE: 9/17/90

FACILITY NAME: Central Steel Drum Company PHONE: _____

ADDRESS: 704 Doremus Avenue, Newark, NJ 07105

OWNER: Central Steel Drum Company PHONE: (201) 344-8500

Nature and type of operation: Manufacture (recycle) steel drums

Length of time at present address: Since 1951

Previous occupants and nature of operations: Inter chemicals Inc: Manufactured Ink

Underground tanks including size, contents, used or abandoned: None

COMMENTS: Uniform Haz. Wastes manifest EPA ID # NJ011482577.
✓ 8 Monitoring Wells on site; sampled 3 weeks ago

INFORMATION FURNISHED BY: Neil Fischer, Secretary-Treasurer
(Company representative) (Title)

SITE DIAGRAM (Including UG tanks, wells, etc.)

✓ Red paint spilled around the incinerator area ends up in the surface and ground waters of State.

✓ Recirculated water is used to paint the outside of the drums.

✓ Poor housekeeping: Drums not properly stored

✓ Retainer walls needed around compressors to prevent discharge to SW

✓ Facility has air pollution permits (Byron Sullivan)

✓ Random spillage (oil/paint) evident in storage area

SURVEY CONDUCTED BY: Joseph Ashie Environmental Spec.
(NJDEP Representative) (Title)

✓ Paint is used to spray finished drums.

Equal Opportunity Employer

TIERRA-B-002760

DWR-047
12/88

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029
TRENTON, NEW JERSEY 08625

C # 50-079

NOTICE OF VIOLATION

DATE 9-17-90

METRO ENFORCEMENT ELEMENT
BUREAU OF REGIONAL ENFORCEMENT
TELEPHONE NO. (201) 669-3900

PCWS # _____ TYPE SUPPLY _____ NJPDES # _____ TYPE DISCH GW SW RCRA # _____
NAME OF FACILITY CENTRAL STEEL DRUM COMPANY
LOCATION OF FACILITY 704 DOREMUS AVE MUN. NEWARK COUNTY ESSEX
FACILITY REPRESENTATIVE AND TITLE NIEL FISCHER

You are hereby NOTIFIED that during an inspection of your facility on the above date, the following violations were noted and remedial actions are required:

DESCRIPTION OF VIOLATION/REMEDIAL ACTION: UNPERMITTED DISCHARGE TO THE SURFACE & GROUND WATERS OF THE STATE, AND POOR HOUSEKEEPING

The above noted violations are in violation of the following N.J. Statutes/Regulation, and will be recorded as part of the permanent enforcement history of your facility:

- [x] New Jersey Water Pollution Control Act (N.J.S.A. 58:10A-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Safe Drinking Water Act (N.J.S.A. 58:12A-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Water Supply Management Act (N.J.S.A. 58:1A-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) and appropriate Regulations.
- [ ] New Jersey Underground Storage of Hazardous Substance Act (N.J.S.A. 58:10A-21 et seq.) and appropriate Regulations.

Remedial action to correct the violations must be initiated immediately. Within five (5) calendar days of receipt of this Notice of Violation, you shall telephone the investigator issuing this notice at the above number with the corrective measures you have initiated to attain compliance. The issuance of this document serves as notice to you that the Department has determined that a violation has occurred and does not preclude the State of New Jersey or any of its agencies, from initiation of further administrative or judicial enforcement action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are subject to penalties of up to $25,000 per day.

Further enforcement action, which will require a written response, may be issued on these violation(s) and any additional violations found during the inspection.

Theo Asphie
Investigator, Division of Water Resources, DEP
THEO ASPHIE

Violation received by
NIEL FISHER

White - Original Canary - Bureau File Pink - Criminal Justice Goldenrod - Central File

New Jersey Is An Equal Opportunity Employer

~~DIVISION OF WASTE MANAGEMENT~~
~~120 ROUTE 156, YARDVILLE, N.J. 08620~~
BUREAU, EMERGENCY RESPONSE
& BABCOCK AVE. / WEST ORANGE 07052.
NOTICE OF VIOLATION

14

ID NO. 870424 0008 DATE 24 APR. 87

NAME OF FACILITY CENTRAL STEEL DRUM COMPANY

LOCATION OF FACILITY 704 DOREMUS AVE NEWARK, ESSEX

NAME OF OPERATOR NEIL FISCHER, CORPORATE OWNER.

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION NJSA 58:10-23.11.c. DISCHARGE OF HAZARDOUS SUBSTANCE PROHIBITED: MASSIVE WATER CONTAMINATION, DIRECT RESULT OF POOR HOUSEKEEPING. GROUND CONTAMINATION ON A SCALE EQUAL TO IF NOT GREATER THAN WATER CONTAMINATION SOIL CONTAMINATION BELOW 6" IN DEPTH ENTIRE SITE; * FLAMMABLES

Remedial action to correct these violations must be initiated immediately and be completed by 9 MAY 87. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Joseph E. Hoyle Jr 1175
Investigator, Division of Waste Management
Department of Environmental Protection (201)669-3951
Hoyle, Joseph E Jr.

E - 8

BBG000076

TIERRA-B-002762

~~120 ROUTE 130, YARDVILLE, N.J. 08620~~
Burgan, Emergency Response
2 Babcock Place, West Orange
07052

NOTICE OF VIOLATION

ID NO. 87 04 24 0008 DATE 24 APR 87

NAME OF FACILITY Central Steel Drum Co

LOCATION OF FACILITY 704 Doremus Ave Newark, Essex

NAME OF OPERATOR Neil Fischer, Corporate Owner

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION NJSA 58:10-23.11.e. Failure to notify Department; Deliberate and willful act disregard of environmental consistency: Massive ground and water contamination, improper disposal (incineration) of solid waste materials (plastics) resulting in toxic and noxious air releases

Refused [signature]

Remedial action to correct these violations must be initiated immediately and be completed by 9 May 87. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

[signature: Joseph E. Hoyle Jr] 1175

Investigator, Division of Waste Management
Department of Environmental Protection (201) 669-3957

Hoyle, Joseph E Jr.

F-7

Suburban Regional Health Commission

MEMORANDUM

TO: Byron Sullivan, DEP-MFO-Air

DATE: April 28, 1987

FROM: Jack Farley, SRHC

SUBJECT:

I.D. No. 05274
CENTRAL STEEL DRUM INC.
704 Doremus Avenue
Newark, New Jersey 07105

Confirming our recent discussion of enforcement activities by S.R.H.C. at the subject site, the enclosed violations and supporting data is submitted for your review and action.

BACKGROUND

S.R.H.C. has responded to approximately 24 citizen complaints alledging objectionable odors and smoke since 3-22-85.

Prior to 4-24-87, the majority of these complaints were not verified because they were received after the fact.

Since approximately 1-1-87 S.R.H.C. has received a series of smoke and odor complaints, principally from "Con-Rail" employees, alledging emissions between approximately midnight and 03:00 hours. The Con-Rail complainants normally work an 11 PM to 7 AM shift, in a railroad yard 500 ft. plus south of the alledged source.

LEGAL ACTION PRIOR TO 4-24-87

LOG No.	DATE	CITE	BY
A860373CDS	3-10-86	8.3(A) & (B)	?
A860374CDS	"	8.3(E) 1 on CT-13006	?
A870044SBA	11-3-86	11.3(b) on CT-67438	SRHC
A870073SBA	11-18-86	8.3(E) 2 on CT-67438	SRHC
? "ACO"	11-2-87	8.1 and 16.1 Penalty $35,000.00	?

Copies are enclosed for your reference

Memo: B. Sullivan
April 28, 1987

ENFORCEMENT STRATEGY PRIOR TO 4-24-87

The late PM, early AM emission complaints presented a difficult enforcement problem to S.R.H.C. since they seemed to occur during periods of rainy, northeast winds, when a v/e observation was impossible. In addition, budget constraints precluded daily overtime site surveillance.

A file review indicated an eight hour daily operating condition for CT-67438 which covered the main drum tunnel and incinerator. (copy enclosed)

The S.R.H.C. investigation developed the data that the CT-67438 process was normally operated from 7 AM to 3 PM, allowed to cool down and then cleaned out between approximately 8 PM and midnight. It was obvious the process was either being operated longer than eight hours daily or improper clean out proceedures were being utilized during the late PM. During a 3-31-87 site conference with company management they requested time to investigate and rectify the situation. On 4-1-87 company management advised S.R.H.C. the problem was due to improper late PM clean out proceedures and poor supervision. They advised an abatement program had been instituted and requested a period of time to prove correction. No additional complaints were received by S.R.H.C. from 4-1-87 to 4-17-87. The investigation of the 4-17-87 complaint found an untrained employee had operated the CT-67438 process due to a holiday schedule. The company advised this situation had been corrected and an S.R.H.C. Order Compliance inspection for (A870044SBA and A870073SBA) was scheduled for 4-27-87.

S.R.H.C. EMERGENCY RESPONSE OF 4-24-87 02:10 HOURS

The incident report by S.R.H.C. responder R. Portuese is enclosed for your reference. His report indicates gross violations of the indicated environmental codes, improper process operations, lack of supervision, and the dumping of hazardous materials and/or the attempted incineration of hazardous materials.

The following 4-24-87 violations are forwarded for your review and action:

1. 8.3(E)-2 violation of previous A/O A870073SBA (CT-67438), main drum tunnel.

2. 8.3(E)-2 violation of (CT-67438), incinerator.

3. 5.2(A) obnoxious odors off property, affidavits attached.

4. 26:2C, 19E failure to notify the Department of a hazardous air contaminant release.

Memo: B. Sullivan
April 28, 1987

CONCLUSION

Company has demonstrated a gross disregard for environmental regulations and public health.

Please note site is approximately 2000' from Newark Bay. Evidence of gross dumping of hazardous materials indicates company may be a significant contributor to Bay pollution.

Please expidite the enclosed violations. It is also requested DEP Waste Management and Criminal Justice be advised of this situation.

JJF/bm
enclosures

cc: Mr. Joseph McGinley, NEWARK
Mr. Gary Allen, DEP-E/R

ecology and environment, inc.
300 McGAW DRIVE, RARITAN CENTER, 2ND FLOOR, EDISON, NEW JERSEY 08837, TEL 201-225-6160
International Specialists in the Environmental Sciences

MEMORANDUM

TO: Fred N. Rubel, Chief - Hazard Response Branch, U.S. EPA

FROM: Danny L. Barney, TATL II

SUBJECT: Central Steel Drum Recyclers, Doremus Avenue, Newark, New Jersey

DATE: 18 September 1981

During the EPA/TAT response to a burning rail tank car of ethylene oxide in Newark, New Jersey on 28 July 1981, TAT member Dave Marlowe and I were asked by the Newark Fire Department (NFD) to conduct air monitoring at the nearby Circle Air Freight facility. Although the freight facility was upwind of te burning car, we conducted the test and did note above background readings with the HNU. We were then escorted by NFD 2nd Battalion Chief Nolan to the nearby Central Steel Drum Recyclers on Doremus Avenue.

The recycling facility was closed for the night, with (reportedly) only a night watchman present. The night watchman gave verbal permission for Marlowe and I to survey the facility, which consists of an incinerator, drum painting buildings, and open drum storage. The facility was extremely disreputable and housekeeping non-existant. HNU readings were 20 to 30 ppm in open areas and 50 to 100 at the entrance of the drum painting area. The site, which covers 5 to 10 acres is virtually covered with pools of oil and various chemicals. The area is all filled marsh and is not covered by concrete or asphalt. Along the back of the site, oil and chemicals were observed flowing into adjacent ditches and wetlands. The number of drums on the site is unknown, however, I would estimate the number to be in the tens of thousands, many of which are leaking.

The incinerator was decrepit and had no scrubber system. Material cleaned from the drums was being burned inside the incinerator.

Partially through the inspection, the night watchman paged Marlowe and I on a P.A. system, and asked us to report to the office. We were then told we had to leave immediately. The watchman at this point was very upset and gave every indication of being extremely frightened. At that time we departed the site.

There is very strong visual evidence to suggest flagrant violations of NPDES, RCRA, FWPCA, and CERCLA. Due to the nature of the site and the magnitude of the problem, I recommend that a joint inspection be made by EPA, NJDEP, and local and state health officials. I also strongly recommend that EPA attorneys become involved in the case prior to any inspection, and that they provide the inspectors with any available information concerning ownership of the site, previous violation history, and current site status.

dls

BBG000120

TIERRA-B-002767

C.S.D. Co. has their waste ash transported by Jonas Waste Removal located at Barkridge Road, Sewell, N.J. 08080 and it is disposed of at Geological Reclamation Operations and Waste Systems, Inc.(GROWS Inc.) located at Bordentown NewFord Mill Road in Morrisville, PA. 19067.

FINDINGS: Based upon information provided by company officials and a review of existing records.

Manifest System:

C.S.D. Co had an insufficient manifest system. The TSD facility certification form was not found along with the generator form. Parts of the manifest were not completely filled out(ie. DOT waste description was missing). In addition, manifests for shipments prior to January 1981 were not available on request. There were a total of 11 manifest out of a possible 17 shipments.

Inspection Schedule:

No written inspection plan was available upon request. No one is assigned the responsibility of checking the waste for signs of disturbance.

Personnel Training:

No documents indicating job descriptions, actual training or future training to be given to personnel were available upon request.

Contingency Plan:

No contingency plan was available. The emergency coordinator is the supervisor in the vicinity of the emergency.

Operating Record:

No operating records were available upon request. Information on the location waste analysis, and operating summary reports of the waste ash were not available.

Closure and Post-Closure Plan:

No plans were available on request.

Waste Analysis Plan:

CSD did not have their own waste analysis plan but, Mr. Adamson, the plant manager, showed us two waste analysis performed by GROWS Inc. on the ash pile CSD manifests as non-hazardous. (See Appendix C for a recent EP Toxicity waste analysis performed on the waste ash.)

Visual Inspection of Facility

Mr. Adamson conducted a tour of the facility operations. All members of the inspection team were present with the exception of Mike Skirka who stayed behind with the equipment that was brought to the facility.

En route to the incinerating portion of the facility we were conducted past machinery that was throwing particules into the air and obstructing our vision. In addition, "empty drums" were blocking the way and were immediately removed by Mr. Adamson. Also, the corridors were filled with sludge and particulate matter. Upon arriving at the incinerator, we found approximately three men, without respiratory protection, loading drums with Sherwin-Williams labels onto a conveyor belt leading into the incinerator. At this point fumes were coming from the incinerator and Ms. Morales informed Mr. Adamson that she could not stay at this point of the process for too long a period of time. As the drums with Sherwin-Williams labels entered the incinerator, a plume of grey smoke and combustion by-product was emitted from the incinerator. At this point Hank Wheat, who was operating an HNU photoionization analyzer (organic vapor detector) indicated to us that the meter had been fluctuating and was now reading off scale(over 2,000 ppm). Standard operating procedure required that we wear Self-Contained Breathing Apparatus(SCBA) protection so we immediately left the incineration area. While leaving the area, another darker plume and an acidic mist surrounded us. The incinerator operation came to a halt for lunch break and the plume and mists dispersed.

Mr. Adamson then took us to the sludge burning incinerator and showed us how the scraper system worked. He stated that the company was having problems with the sludge incinerator and that it was presently burning sludge at a temperature range of 2,000-2,600° F for 8 hours. The resultant ash is scraped out of the incinerator by hand and is accumulated on what appeared to be bare ground 15 feet away. The pile is offered no protection from the elements. The pile is reportedly transported from the facility every ten days in a 20 cubic yard container.

At this point it was noted by Ms. Morales and Mr. Wheat, that there were random open drums filled with sludge matter and also drums with more than an inch of an adhesive or resin material inside. Some drums were found laying on the ground in disarray with resinous material spilling from it.

The inspection team then started back to the office and, en route, noted what appeared to be a ditch on the southeastern part of the facility. When asked what it was, Mr. Adamson stated that it was a small creek and that he would provide us with the name when we returned to the office. The area around the ditch appeared to be disturbed and the ditch had a green color with an oily sheen to it. Upon arriving at the office, Mr. Adamson asked Mr. Fischer(the company Secretary who signed the notification form) the name of the creek and no one seemed to know.

This concluded the inspection.

DISCUSSION

CSD recycles "empty drums" and in the process a sludge is generated. This sludge is then burned in a sludge burning incinerator which turns the sludge into an ash. CSD does not perform waste analysis on their waste since they believe it to be non-hazardous after it is burned. A waste analysis was performed by GROWS Inc.'s outside independent laboratory, Ages Laboratory located in Potstown, PA. GROWS Inc. has a Retesting Policy that requires that a sample of waste be tested every year to insure that the waste they receive is the same as the initial shipment. The initial sample in this case was tested on July 8, 1980 and the retested sample was tested on July 16, 1981(Please note the date of letter in Appendix C.) The analysis performed on the waste ash sample include a test for EP Toxicity which showed the sample to be EP Toxic for lead. CSD is in violation for not manifesting their waste as hazardous and for not providing their own Waste Analysis Plan.

In a letter to Julio Morales-Sanchez, Director of Enforcement,(See Appendix A) CSD stated it did not file for a Part A permit since they do not take in materials for treatment nor do they store for more than 90 days. There seems to be confusion on their part since these elements are not the only criteria for falling within the jurisdiction of a TSD facility. This puts them in violation for treating hazardous waste without a TSD permit. It appears from the letter that CSD may have been in the computer system as having submitted a Part A application but, then deleted as a result of their letter to EPA.

There have been additional violation such as lack of Records Inspection, Facility Inspection and Contingency Plan. Also their waste pile and incinerator do not meet RCRA specifications.

RECOMMENDATIONS:

Enforcement action be taken.

Suggest that a sampling inspection be performed at the facility by both the Air and Water Sections of EPA for possible contamination of air, soil, groundwater and nearby creek.

Suggest that the Local Health Department be notified concerning health violations. OSHA was called and arrived at the facility on December 8th, 1981. They cited CSD for not having an adequate cover on one of their pulleys.

CSD has called in Environmental Consulting Testing located in Cherry Hill, N.J. to perform an environmental audit on the facility. It is recommended that EPA obtain their report on the site which should be ready in approximately two weeks.

Notify DEP of CSD's operations and possible violations.

DIRECTORY TO APPENDIX

APPENDIX A: INITIAL SITE INFORMATION

1/4/82

Mr. Howertz,

Enclosed you will find the analysis performed by G.R.O.W.S. on a sample from a shipment of waste ash from Central Steel Drum Co. I hope this information is of use to you.

Sincerely,
Angela Morales

Central Steel Drum C

GEOLOGICAL RECLAMATION
OPERATIONS AND WASTE
SYSTEMS, INC. (G.R.O.W.S.)
[illegible]
[illegible] and New Ford Mill Road, Morrisville, PA 19067
Phone: (215) 295-5114

November 6, 1981

Mr. Gerald Greenburg
Central Steel Drum Co.
704 Doremus Avenue
Newark, New Jersey 07105

Re: D-148 "Incinerator Residue"

Dear Sir:

Enclosed are the results of an analysis of a sample, of the above referenced waste material, generated by your company. This sample was obtained directly from a shipment of the subject waste stream, prior to disposal at G.R.O.W.S.

If the analytical results of certain parameters on the accompanying data sheet are circled, then they are considered to have been present in the sample of the waste, in concentrations excessive enough to warrant concern. Therefore, G.R.O.W.S., Inc. requests, in writing, a detailed explanation for the presence of these concentration levels or whether they are considered to be representative of the waste stream.

This explanation should be submitted to G.R.O.W.S. within thirty working days of the date on this letter. If we do not receive a response within the specified time period, disposal of this waste material, at G.R.O.W.S., may be terminated, with subsequent notice to the Pennsylvania Department of Environmental Resources.

If there are no parameters circled on the Retest Data Sheet, then the results were considered to be acceptable and no response from your company is required.

Please contact us if you have any questions.

Sincerely,

Samuel M. Lybrand

SML:ms

G.R.O.W.S., INC.

G.R.O.W.S. RETEST DATA SHEET

GENERATOR CENTRAL STEEL DRUM

WASTE STREAM DESCRIPTION INCINERATOR RESIDUE

G.R.O.W.S. WASTE I.D. # D-148

HAZARDOUS WASTE STATUS NON HAZARDOUS

PARAMETER	TOTAL (mg/kg)	EP Toxicity LEACHATE (mg/l)
Chemical Oxygen Demand		1889
Total Organic Demand		468
Cyanide		
Percent Solids		
Phenols		
pH	8.9	5.3
Arsenic	2.86	0.004
* Barium	610.0	0.59
Cadmium	48.3	0.46
Chromium	870	0.022
Copper	6165	9.73
Lead	9000	27.9
Mercury	0.093	<0.001
Molybdenum	922.0	<0.01
Nickel	120.0	0.36
Selenium	0.093	<0.001
Silver	0.083	<0.009

*For future reference please provide the maximum concentration of this parameter which can be expected in the subject waste material.

S&W WASTE INCORPORATED

115 JACOBUS AVENUE • SOUTH KEARNY, N. J. 07032
201-344-4004

GENERATOR'S WASTE MATERIAL PROFILE SHEET

GENERAL DIRECTIONS: In order for us to determine whether we can lawfully, safely and environmentally transport, store, treat or dispose of your waste stream, we must ask certain information about your waste. All of the information we seek is necessary, for our purposes and yours. Be complete in your answers: if your response is "none," so indicate. Answers must be in ink or typewritten. Information you provide will be maintained in strictest confidence. Please make a copy of this form for your records, returning the original to the location indicated below.

THIS FORM AND ANY SUPPLEMENTAL MATERIAL MUST BE RETURNED TO:
S & W Waste, Inc.
53 Penn. Ave.
S. Kearny, N.J. 07032 EPA I.D. #: NJD 096865837

1. GENERATOR NAME AND ADDRESS: CENTRAL STEEL DRUM 704 DOREMUS AV NEWARK, NJ 07105
2. EPA I.D. NUMBER: NJ D011482577
3. COMPANY CONTACTS:
   BUSINESS: JERRY GREENBURG, ALAN FISHER
   TECHNICAL: LANCE GOLD
4. WASTE NAME: PAINT WASTE
5. PROCESS GENERATING WASTE:

6. PHYSICAL PROPERTIES OF THE WASTE
a) Physical state at 70°F: (SOLID) SEMI-SOLID LIQUID OTHER: SOLID 2-10% H2O
b) Viscosity at 70°F: LOW MEDIUM (HIGH)
c) Flash Point: ≤ 140 °F (Closed Cup) Open Cup
d) pH Range: 1-3 3-5 (5-7) 7-9 9-11 11-13 N.A.
e) Layering (for liquids only): (NONE) MULTILAYERED BILAYERED
f) Specific Weight: 1500# / YD (as # per unit)
g) BTU Value: N/A (solvents and oils only)
h) Vapor Pressure: N/A (for liquids only; in mm Hg at 70°F)
i) Is waste a pesticide or produced in a pesticide-manufacturing process?: NO
j) % Solids: 30
k) Does waste contain Polychlorinated Bi-phenyls (PCB'S)?: NO
l) Does waste contain chlorinated organic solvents?: NO
   If so, please list with approximate ranges:

m) Is the waste sulfonated?:
n) Characteristic color:
o) Characteristic odor:
p) Does waste contain cyanide or cyanide-producing compounds?:
q) Heavy Metal Information (include ranges in ppm)

	TOTAL	EP TEST		TOTAL	EP TEST
Ag			Hg		
As			Ni		
Ba			Pb		>5ppm
Cd		>5PPM	Se		
Cr		✓	Zn		✓
Cu					

7. ORGANIC COMPONENTS (with ppm or % ranges)

SOLVENTS ASSOCIATED WITH PAINT MANUFACTURING (E)
XYLENE, TOLUENE ETC. ∠ 20%

8. OTHER COMPONENTS (with ppm or % ranges)

water 5 - 10%

9. HAZARDOUS COMPONENTS AND CHARACTERISTICS

A) Hazardous Properties (insert number codes; see back page)
toxicity ratings: Inhalation 1 Dermal 1 Oral 1

B) NFPA Hazard Identification System:

Flammability

Health 1 2 0 Reactivity

Special Instructions

C) IS THIS WASTE A "HAZARDOUS MATERIAL" AS DEFINED BY REGULATIONS OF THE U.S. DEPARTMENT OF TRANSPORTATION PURSUANT TO THE HAZARDOUS MATERIALS TRANSPORTATION ACT? YES
(See 49 CFR 172.101 and 173 for "Hazardous Materials" list and characteristics)
If so, please complete the following:
1. Correct DOT Shipping Description: SOLID HAZARDOUS WASTE (PAINT RESIDUE)
2. Correct DOT Container:
3. Hazrd Class(es): ORM-E
4. Identification Number (from "Hazardous Materials" list): 9189
5. Placards required?: EXEMPT IN BULK

D) IS THIS WASTE A "HAZARDOUS WASTE" AS DEFINED BY THE REGULATIONS OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976? YES
If so, please complete the following:
1. Is the waste a listed "Hazardous Waste" under RCRA?: YES
2. Give the EPA Waste Type if applicable: D008
3. The listed description of the waste:

4. The hazard criteria for which the waste is listed:

IGNITABLE	CORROSIVE	REACTIVE	TOXIC
D001	D002	D003	D000

5. If the waste is not listed, what hazardous characteristics does it possess?:

E) DOES THIS WASTE STREAM CONTAIN ANY RADIOACTIVE, EXPLOSIVE, WATER-REACTIVE, AND/OR SHOCK-SENSITIVE MATERIALS?: NO

10. SHIPPING REQUIREMENTS

1. Indicate how the waste material is to be shipped:
drum _____ bulk ✓ other _____
2. Shipping frequency: quantity AS per NEEDED

3. Transportation equipment requirements: S&W WILL SUPPLY

4. Service/scheduling requirements: AS NEEDED

11. CERTIFICATION: I HEREBY CERTIFY THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND ABILITY.

X 2/92 X Sec Treas.

DATE TITLE SIGNATURE

12. CONFIDENTIALITY REQUEST: _____ REQUESTS THAT S & W WASTE, INC. AND ALL OTHER REGULATORY AGENCIES TO TREAT THE ABOVE INFORMATION, AND ALL OTHER SUPPLEMENTARY DATA PROVIDED, AS CONFIDENTIAL BUSINESS INFORMATION AND THE PROPERTY OF _____. ALSO, IT IS REQUESTED THAT THIS INFORMATION NOT BE DISCLOSED TO OTHERS EXCEPT AS REQUIRED BY LAW OR REGULATION.

BY: _____ _____ _____

DATE TITLE SIGNATURE

HAZARDOUS WASTE INVESTIGATION HW/EF 07-27

AI Inspector: Alphonse Iannuzzi Date: 2/3/82

Location: Central Steel Drum
St: 704 Doremus Ave.
Town: Newark
County: Essex
Lot: 1 Block: 5074

Property Owner:
Greenberg, Ratner & Baron
704-738 Doremus Avenue
Newark, NJ

Origin of Complaint:

Complaint: Follow-up of March 28, 1980 NOP

Findings:

On 2/3/82 Central Steel Drum (CSD) was investigated with Bill Brown, SWA Geologist, and Charlie Bazdlo, Newark City Engineering Department. Lance Gold, Plant Manager, and Dr. Fungaroli, from CSD's consulting company, AGES, were contacted.

Purpose

This investigation was a follow-up of a DEP issued NOP to CSD for disposing their incinerator ash on site. Bill Brown was present to determine the validity of CSD's consulting report and to pick adequate sampling points.

Sampling

Samples were not taken from parking lot covered with gravel where incinerator ash was dumped due to the ground being too frozen to dig. Two samples were taken along and in an unfrozen drainage ditch in the southeast section of the facility.

1. A sample of soil was taken from the east side of the drainage ditch bank approximately 6 inches under the water level, sample # AI 136A. This material consisted of a grey soil with yellow,blue and pink colors in it. Strong solvent odors were noted from this sample.

2. A second sample, AI 137A, was taken in the southeast drainage ditch prior to where it flows into a stream. This section was sampled due to it being a likely area where heavy metals would settle as a result of contaminated run-off. This sample was taken approximately 6 inches from the east bank and 6 inches under the water level. The sample consisted of a greyish soil which had strong solvent odors similar to those from sample AI 136A. Mr. Brown stated that this material appeared to be a dark grey soil mixed with ash and silt or clay. Sample data sheets for each sample and a diagram indicating where samples were taken is attached to report.

During sampling, due to raining during the inspection, contaminated run-off with an oily sheen was noted flowing into the drainage ditch from under the gravel on the parking lot. A heavy silver oil sheen was noted on most of the water surface in this ditch and the water had a greyish-red tint to it. The soils sampled appeared to be highly contaminated with material which was dumped

on site due to the discoloration and strong solvent odors. Outcropping from the drainage ditch banks contained old rusted drums, plastic material, wood, and various colored sludges (i.e., yellow, white, blue, etc.).

Observations - Youngstown Barrel & Drum truck

As noted in an EPA December 7, 1981 RCRA inspection report, a Youngstown Barrel & Drum truck (Youngstown, PA) was on site with approximately 60 drums that contained 4 inches or more material in them. Since CSD can only accept drums with one inch or less material in them, Mr. Gold stated that these drums were rejected by CSD. Mr. Gold stated that Environmental Consulting and Testing Service will handle legal ramifications of sending this material back to Youngstown (i.e., manifest). Two drums were checked on this truck and appeared to have a paint residue in them which this inspector approximated 2 to 3 inches.

Photographs

Housekeeping throughout the facility was very poor. The following include photographs (18) of such conditions:

1. Spillage of white sludge on soil in drum staging area in western section of facility.

2. Purple liquid, approximately 40' x 40', on soil also in staging area.

3. Multi-colored sludges on soil next to chain conveyor for incinerator in central section of lot.

4. Close up of spillage as described in #3.

5. Blue liquid on soil next to conveyor to incinerator in central section of lot.

6. Three full drums north of blasting building.

7. One full drum north of blasting building.

8. Two full drums next to blasting building on north side, one containing red and the other white sludge.

9. Incinerator putting out black smoke.

10. Full drum of black oily liquid and spill at its base on north side of blasting building. Mr. Gold stated that it is paint. Also noted in this areabut not photographed were four full 30 gallon drums containing a rusty metal substance and purple sludge.

11. Pink and white spills on soil and a full drum Mr. Brown is pointing to, east of the incinerator.

12. Drum spraying a red liquid from a leak onto soil, next to the incinerator.

13. Pile of incinerator ash stored on soil next to the incinerator. Mr. Gold stated that this material is stored in such a manner until Jonas Waste Removal, Sewell, NJ picks it up with a roll-off for disposal at GROWS landfill, PA.

14. Yellow and white solid material dumped in area next to drainage ditch where it empties into stream.

15. Stream bed containing garbage/sludges and sheen on stream near where sample #AI 137A was taken.

16. Drums in stream, southeast section of facility.

17. Purple soil near stream, southeast section of facility.

18. Contaminated run-off with sheen running from CSD property into stream, southwest section of property.

Synopsis

The previous photographs noted are an indication of the housekeeping problems at CSD. Other problems include:

1. Strong odors and thick black smoke emitted from the incinerator.

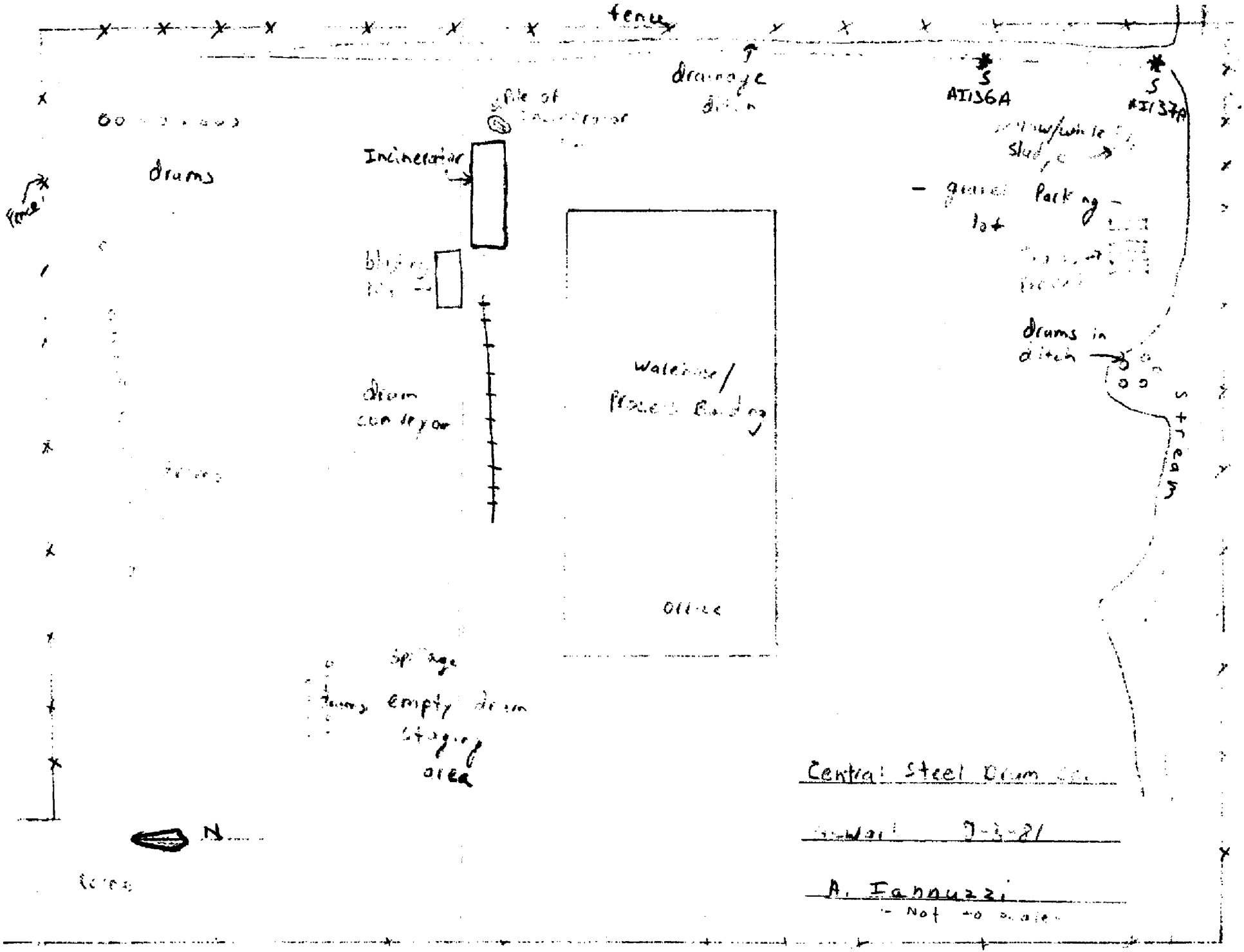
2. Contamination of soil, surface water, and groundwater from spillage.

3. Storage of approx. 20-30 full drums for more than 90 days. Mr. Gold stated that full drums were on site for several years and definitely since he started working 5 months ago.

4. Illegal waste storage pile (incinerator ash).

5. Illegal disposal of sludges dumped in areas sampled and spillage which was never cleaned up.

cc: Bill Brown, SWA
Angela Morales, EPA
William Saywer, EPA



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
CN 028
Trenton, N.J. 08625-0028
(609) 633-1406
Fax # (609) 633-1454

CONFIDENTIAL
MEMORANDUM

TO: Steven Madonna, Assistant Attorney General
Department of Law and Public Safety

THROUGH: Nancy Stiles, Director
Division of Regulatory Affairs 1/16/90

THROUGH: Lance R. Miller, Acting Director
Division of Hazardous Waste Management

FROM: Dennis Hart, Acting Assistant Director
Responsible Party Cleanup Element

SUBJECT: Central Steel Drum
Newark, Essex County, N.J.

This memo serves as a request for action by your office with regard to the current illegal operations at the referenced site. A synopsis of the general history and current status of the Central Steel Drum site is provided below.

Central Steel Drum Company (hereinafter "CSD") is an active drum reconditioning facility located at 704 Doremus Avenue, Newark, N.J. (hereinafter the "Site"). The Site consists of approximately 8.5 acres and is located in a heavily industrialized section of Newark, surrounded on all sides by refineries, chemical plants and other industrial facilities. CSD is violating the Water Pollution Control Act, the Spill Compensation and Control Act and the Solid Waste Management Act by employing its current operating practices.

Process Description: CSD's operations at the Site involve the reconditioning of drums used in the food, paint, adhesive and ink industries. The drums which CSD accepts on site should be "empty", meaning that they contain one (1) inch or less of the former contents, although Departmental inspections have shown otherwise. Drums containing one-inch or less of waste are exempt from RCRA regulations.

Upon entry to the Site the drums are placed in a drum storage area, the open-top drums standing up-right and the close-top drums lying on their sides. The drums are removed from this area as the incoming orders dictate and transported to an incinerator on a chain conveyor. At the head of this incinerator the drums are flipped over, depositing the former contents onto the conveyor and ultimately onto the ground. The chain conveyor transports the drums through the incinerator, burning whatever residue remains. After the incinerator, the drums are blasted with steel shot to remove any remaining paint or residues, pressure tested, reformed, painted and sold to industry. The facility processes 3,000 drums a day, with approximately 60,000 drums stored at the Site. We have videotaped this operation during a recent site inspection.

Owners and Operators: CSD is a privately held company, with the principals listed as follows:

President - Allen Fischer
Vice-President(s) - Gerry Greenberg
- Edward Fischer
Secretary - Neil Fischer
Treasurer - Jeffrey Skuraton

These principals have been operating at the Site since 1966, at which time they purchased CSD from the original operators, who are unclear because of the lack of file information.

CSD operates at the Site as leasee to a corporation named Dore Realty, Inc., which is listed as dissolved by the State Department on July 25, 1966. There are indications that Dore Realty was the former operator at the Site. The individual listed owners of the Site are as follows:

Dorothy Greenberg
Bessie Baron
Jane Ratner-Mattson
Marian Ratner-Abrams

Records indicate that Gerry Greenberg (V.P) is related to Dorothy Greenberg as her son.

Financial Status: A recent Dun and Bradstreet search listed CSD as a company which has annual sales of $5,000,000 and, according to this information, the sales have remained constant since 1982, with no percentage increase. A search of the tax assessor records lists the property value of the principal's residences as follows:

Alan Fischer
39 Harvey Drive
Short Hills, N.J.
Assessed: 1984 Value: $298,100

Neil Fischer
47 Spencer Drive
Short Hills, N.J.
Assessed: 1984 Value: $182,700

Jeffrey Skuraton
89 Hartshorn Drive
Short Hills, N.J.
Assessed: 1985 Value: $388,800

Gerald Greenberg and Edward Fischer have no listed property values.

A search of the tax assessor records for the property value of the Site is as follows:

Property: Block 5074, Lot 1
Assessed: 1986
Value: Land - $169,900
Buildings - $ 81,900

Total Value: $251,800

Departmental Involvement: The Department of Environmental Protection (hereinafter "Department") has been involved in this site since November 27, 1979 when the Department received an anonymous complaint of illegal waste disposal practices at the Site, namely the burying of incinerator ash. To date, four (4) separate Divisions have been involved in different capacities with this case; Division of Environmental Quality, Division of Water Resources, Division of Waste Management (now Hazardous Waste Management) and the Division of Regulatory Affairs. A description of their involvement is as follows.

Division of Environmental Quality (DEQ) Most of DEQ's involvement with the Site deals with the monitoring of the drum incinerator permit, which was issued in 1983. Compliance inspections of the Site, beginning in 1986, have shown that the incinerator was operating illegally and releasing massive fugitive emissions into the air. DEQ has issued many Administrative Orders and Penalty Assessments for these violations, but to date none of the penalties have been paid. (See attached DEQ referral).

On August 30, 1988, CSD entered into an Administrative Consent Order with DEQ to replace the existing incinerator. A permit application was submitted, but determined to be incomplete by DEQ, so CSD was required to submit a complete application. The updated application was received by DEQ, but not approved because of review difficulties. During this time period CSD's incinerator permit had lapsed and DEQ determined that CSD was operating the incinerator illegally. There is a $200,000+ penalty outstanding against CSD for violations of the drum incinerator permit or lack thereof.

Currently the State is involved in an Administrative Law matter regarding the operation of the incinerator out of compliance with the Administrative Consent Order. The hearing is set for September 6, 1990, and the DAG involved is Rachel Lehr (3-8119).

Division of Water Resources (DWR) On March 6, 1987, DWR required CSD to submit an application for a NJPDES-DGW permit. This letter was issued in response to a DWR enforcement site inspection where CSD was observed dumping drum contents onto the ground. DWR determined that this was a

discharge to ground water and through the permit CSD is required to remediate soil contamination at the Site. DWR received a completed NJPDES application from CSD on July 8, 1987, but its processing was stopped because DHWM was requiring CSD to remediate on-site contamination, therefore DHWM's actions would address DWR's concerns as well.

DWR was also involved in the reviews of monitor well locations (reference Attachment A) and sampling requirements in 1985, but no additional actions were necessary and none were taken.

Division of Waste Management (DWM) DWM first became involved with this case in 1979 when the aforementioned complaint of illegal dumping was received. A Notice of Prosecution was issued to CSD on March 28, 1980, ordering CSD to halt all illegal waste disposal practices and remediate any on site contamination. CSD did not comply.

In 1980, DWM began to conduct site inspections at the Site to monitor CSD's compliance with environmental regulations. The Division's inspections continually disclosed full drums on Site, numerous spills on the ground, poor operating practices and general sloppy housekeeping. From 1980 onward DWM issued numerous Notices of Violations to CSD for violations observed during site inspections, but at that time the majority of the enforcement actions were undertaken by EPA.

In 1983, DWM referred the case to Criminal Justice for a criminal investigation and to the Attorney General for an injunction against CSD for numerous violations of the Solid Waste Management Act. There is no indication in the file as to the result of these referrals, but further investigation is necessary.

During 1985 DWM was involved in the review and approval of monitor wells at the Site in response to a EPA Consent Agreement with CSD. After this review DWM apparently became inactive in this case until September 21, 1988, when the case was transferred to the Responsible Party Cleanup Element. We are currently negotiating an Administrative Consent Order with CSD to address this site, absent DEQ issues. The negotiation deadline is July 16, 1990 but we do not anticipate CSD entering into the Administrative Consent Order.

Division of Regulatory Affairs (DRA) DRA was active in the case from 1982 to 1985, giving regulatory support to the other divisions involved. The role of DRA is not clearly defined in the file, but the Regulatory Officer was Scott Dubin.

EPA Involvement: The first indication of involvement by EPA was through a Site inspection on September, 1981, where EPA noted full drums, spillage and general sloppy housekeeping. At this time the interrelation between the Department and EPA is not clear.

On March 19, 1982, EPA issued a Complaint and Compliance Order stating that CSD violated RCRA and the regulations thereunder. The Order also required CSD to comply with applicable regulations and stop illegal treatment of the ash and sludge (incineration). On April 28, 1982, CSD replied to EPA

denying all the charges set forth in the order. A $38,000 penalty was assessed which was never collected.

On November 25, 1983, EPA entered into a consent agreement with CSD which required CSD to remediate the site, among other things. There was no response from CSD until May, 1984, when CSD installed monitor wells at the Site (as was referenced above). The delay was attributed to difficulty in review of the monitor well requirements.

On April 9, 1985, EPA received the results of a hydrogeologic assessment which was completed to examine the conditions of the shallow and deep aquifers, but did not determine the extent of contamination at the Site. The results were of no use in terms of the effect of contamination on the site. In February 1986, EPA conducted soil, surface water and ground water sampling at the Site to determine the amount of on site contamination. The analysis revealed that the Site was heavily contaminated in all media. According to the file, EPA did not request any further sampling to delineate the extent of contamination.

The last recorded involvement EPA had with this case was a request for information letter dated September 23, 1987. Further investigation is warranted into past involvement of EPA in the event of litigation.

Possibility of Criminal Activities: Past conversations with Tom Brady, field inspector for DHWM, have incorporated the possibility of criminal activities in terms of illegal waste disposal or the illegal disposal of drum contents. This information is unsubstantiated, but demands further criminal investigation.

Other Related Activities: The principals of Central Steel Drum operated a similar facility in Burlington County called South Jersey Container Corp. (hereinafter "SJC"). Apparently one (1) day before ECRA became effective, SJC sold the property on which they operated to a party for the sum of one (1) dollar. This was viewed as an attempt to avoid ECRA by the Department. When SJC stopped operating at the Site they triggered ECRA and were required to comply with all the regulatory obligations. During that time period SJC also received a substantial penalty for their activities at the Site. The decision was made within the Department to allow SJC to "go ECRA" instead of paying the penalty. SJC made a minimal attempt at Site remediation, but eventually gave up and abandoned the Site. The State used Spill Fund money to secure the Site with a fence and within that timeframe a $100,000+ penalty was assessed against SJC. To this date there are hundreds of full drums of unknown material at this Site and the penalty matter has been transferred to BPA for reassignment. According to the Department's records the principals of South Jersey Container are the same as Central Steel Drum and any actions that are taken against CSD should be correlated with the SJC case.

Conclusion/Recommendations: The Central Steel Drum site and operations is a complex case with an abundance of related issues. This case involves the Department, USEPA, DAG and Administrative Law offices and it lends itself to a variety of conclusions, I believe the foremost being the total remediation of the Site.

The information (i.e. Site inspection reports, sampling data, etc.) on this site is abundant, the process is ongoing and sadly enough the company still entertains a blatant disregard for environmental regulations. Through this case the Department should shut down the facility, collect substantial penalties and send a clear message to other drum reconditioning companies as well as assure the total site remediation in the event of unsuccessful negotiations. All these issues need to be addressed.

In order to construct the best possible case against CSD, DHWM suggests the following course of action:

1. Surveillance should be initiated to detect any illegal discharges through the drum flipping process. This surveillance will prove, beyond any doubt, that CSD is committing illegal acts at the Site. We can discuss surveillance points with you;

2. The drums on Site will have to be examined and analyzed to determine if the residue in the drums is a hazardous waste, hazardous substance or pollutant. The major violations we would expect to encounter here would be the illegal treatment, storage, disposal or discharge of a hazardous waste or substance. This is a necessary foundation for the case;

3. Operations at the site indicate blatant violations of the Solid Waste Management Act. A criminal investigation into these activities should be conducted; and

4. If CSD is determined to be violating the Spill Act, Water Pollution Control Act or Solid Waste Management Act and/or participating in illegal activities a court order could be issued to CSD for the purpose of halting all aspects of their existing operations. This, action and all the aforementioned actions, will result in the most expedient conclusion of the continuing neglect for environmental regulations by the Central Steel Drum Company. In conjunction with this action we would be ready to discuss with USEPA the possibility of removing the drums from the site and we may also be able to have the generators remove the identifiable drums.

Due to the complex legal and environmental problems associated with this site it is imperative that a consolidated enforcement action be taken to address this site. A meeting between your office and all Departmental offices involved in this case should be held as soon as possible.

kj

Attachment A
Central Steel Drum

- SITE HORIZONTAL DATUM PER N.J. GEODETIC CONTROL SURVEY MONUMENTS NO. 641 AND NO. 9679.
- VERTICAL DATUM IS NGVD PER CGS MONUMENT NO. Z-57. PUBLISHED ELEVATION 10.072'.
- PROPERTY LINES SHOWN ARE APPROXIMATE AND ARE BASED ON TAX MAP DATA; DEEDS PROVIDED BY CLIENT.

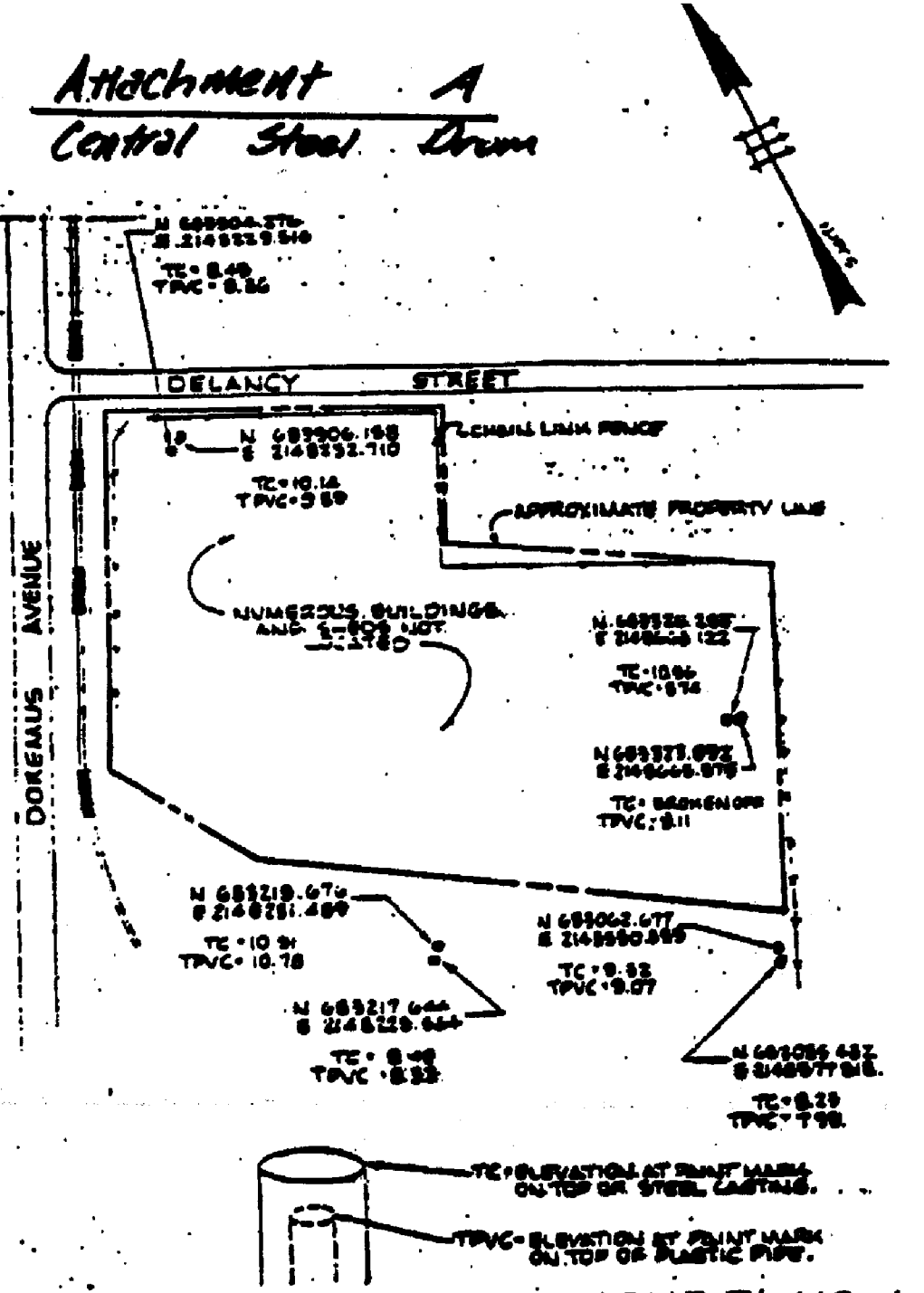


FIGURE NO. 1

SKETCH SHOWING LOCATION OF WELLS

LOT 1, BLK 5074

CITY OF NEWARK
COUNTY OF ESSEX
NEW JERSEY

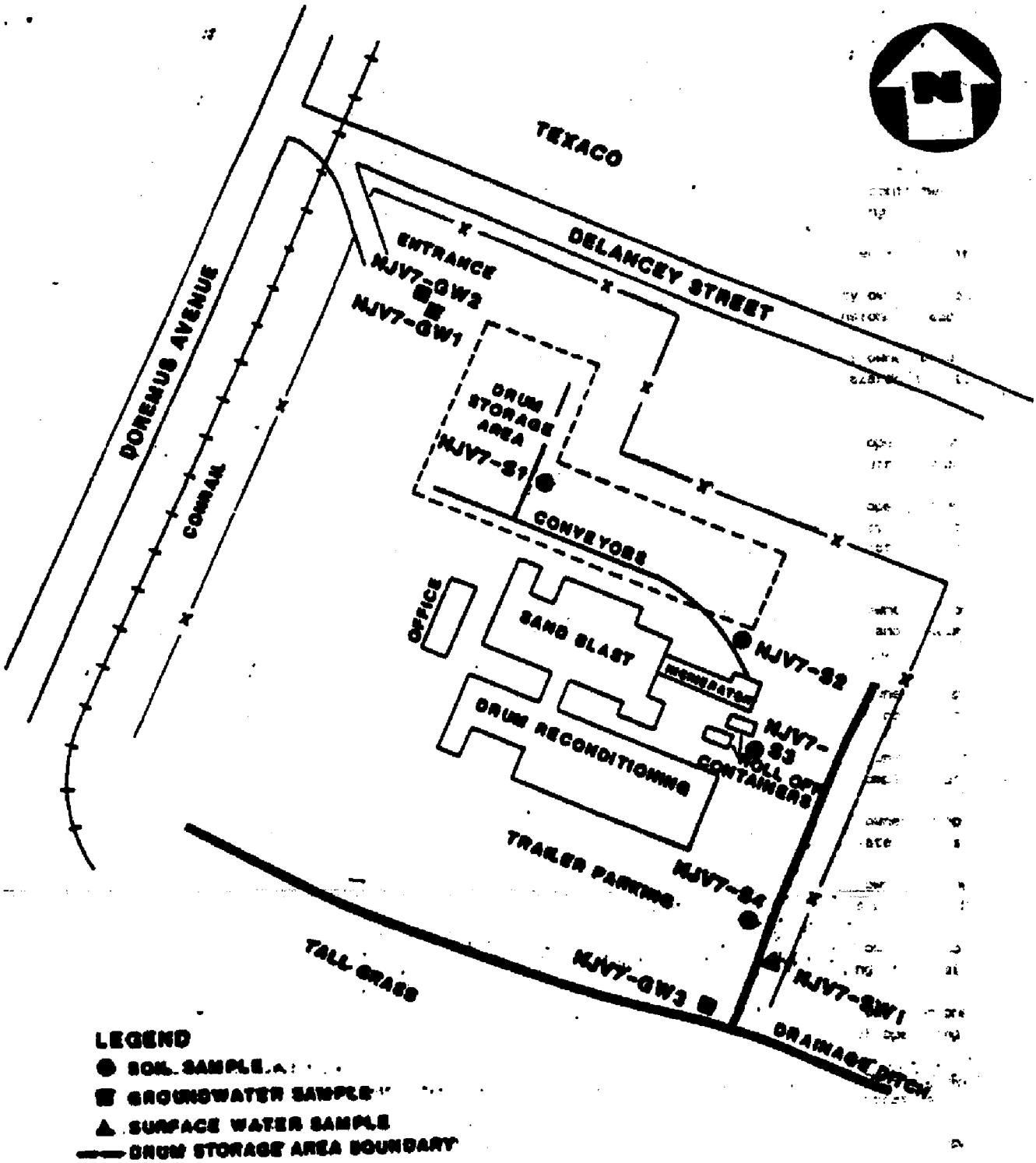


FIGURE A-2

SAMPLE LOCATION MAP

CENTRAL STEEL DRUM, NEWARK, N.J.

(NOT TO SCALE)

[redacted]

Form DWR-062
3/81

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES

REPORT OF PHONE CALL OR VISIT

50-0790

Newark

Bureau or Office: MBCE

In: ____ Out: ✓

Date: 7/18/96 Time: ____

File: Central Barrel & Drum

Routing: Richard White RW
Gloria Grant GG

Person Contacted: Rich Portuese

Phone No.: ____

Affiliation: WaterWatch & Director of Suburban Regional Health

Subject of (Call) (Visit): Central Barrel & Drum

Summary of (Call) (Visit): Mr. Portuese informed me that he has been [and Air Quality] with representatives of Emergency Response to Central Barrel & Drum 704 Doremus Avenue in Newark. He believes there are many water pollution violations. The wash curtain that washes out hazardous waste, oil, and paint sludge goes out to the surface water. He also believes that they spill the waste onto the ground and has built up a layer of pollution that is leaching into the bay.

Action Recommended: ____

Kathleen Boyer
Signature

BBG000218

TIERRA-B-002791

AKZO NOBEL

Coatings

January 16, 1998

Ms. Suzanne Becker
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, New Jersey 08837

RE: Request For Information Pursuant To Section 104(e) of CERCLA, 42 U.S.C. Section 9604(e); Central Steel Drum, Superfund Site, Newark, Essex County, New Jersey

Dear Ms. Becker:

Akzo Nobel Coatings Inc. ("Akzo Nobel Coatings") has received the United States Environmental Protection Agency's ("USEPA") letter of November 26, 1997, in which USEPA requests information regarding the above-referenced site pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Akzo Nobel Coatings is responding to USEPA's request for information. Pursuant to my telephone conversation of December 22, 1997, with you, USEPA agreed to extend the reply date to January 21, 1998.

With respect to USEPA's request for information, Akzo Nobel Coatings objects to USEPA's instructions and questions insofar as they conflict with the Federal Rules of Civil Procedure and to the extent that USEPA's questions seek information protected by Attorney Client Privilege, Work Product and/or Self-Critical Analysis. Further, Akzo Nobel Coatings objects to each and every definition and/or question to the extent that the definition and/or question is vague, overly broad, harassing, and/or unduly burdensome. Finally, Akzo Nobel Coatings objects to providing information which: (1) is not in its possession, custody or control; (2) is in the possession, custody or control of USEPA or third parties; or (3) is beyond the scope of USEPA's authority under CERCLA Section 104.

Akzo Nobel Coatings Inc.
P.O. Box 37230
Louisville, KY 40233-7230
4730 Crittenden Drive
Louisville, KY 40209
Tel. (502) 367-6111
Fax (502) 375-5475

Akzo Nobel Coatings' good faith in responding to the request should not be construed as an admission or acknowledgment of any liability, or waiver of any rights or defenses by Akzo Nobel Coatings with respect to any claim which may be the subject of the request or relates in any way to the above-referenced site. Additionally, in providing this response, Akzo Nobel Coatings does not in any way waive, but specifically preserves all objections to competency, relevancy, materiality and admissibility of the responses or documents produced in any proceedings.

Subject to and without waiving the above objections, Akzo Nobel Coatings responds to USEPA's request for information as follows:

General

Akzo Nobel Coatings notes the USEPA's request for information was addressed as follows:

"Akzo Chemical
100 Belmont Street
Somerset, NJ 08873-1204"

Akzo Nobel Coatings would like to clarify that the Somerset, New Jersey plant is not owned by Akzo Chemicals, but is owned by Akzo Nobel Coatings. Therefore, Akzo Nobel Coatings is responding to USEPA's request for information. Please change your database to Akzo Nobel Coatings and send future correspondence to:

Douglas W. Butler
Akzo Nobel Coatings Inc.
4730 Crittenden Drive
Louisville, KY 40209

Further, Akzo Nobel Coatings is responding to USEPA's request for information with respect to its Somerset, New Jersey plant only. Akzo Nobel Coatings has no other manufacturing plant in the state of New Jersey, and has no manufacturing plants in the states of New York, Pennsylvania, Delaware or Maryland. To the best of its information and belief, Akzo Nobel Coatings does not believe that any other manufacturing plant of Akzo Nobel Coatings conducted business with Central Steel Drum.

USEPA Specific Requests

1. a. Akzo Nobel Coatings Inc.
   b. Corporation, Delaware
   c. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

      The officers of Akzo Nobel Coatings are:

      Ove Mattsson, President
      Robert J. Torba, Vice President, General Industrial Coatings
      Pete Scolaro, Vice President, Manufacturing and Engineering
      William O. Weiss, Secretary
      Natasha Nelson, Assistant Secretary
      Terrance R. Francek, Treasurer, Controller, Industrial Coatings
      Janice Lucchesi, Tax Officer

   The business address of Akzo Nobel Coatings is as follows:

   Street address:

   Akzo Nobel Coatings Inc.
   4730 Crittenden Drive
   Louisville, KY 40209

   Mailing Address:

   Akzo Nobel Coatings Inc.
   P.O. Box 37230
   Louisville, KY 40233

   d. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information.

Akzo Nobel Coatings' immediate parent corporation is Akzo Nobel Inc. The officers of Akzo Nobel Inc. are:

Piet Provo Kluit, President
Peter S. Gold, Senior Vice President, Law, General Counsel and Secretary
Eileen R. Keller, Financial Vice-President and Treasurer
Philip E. Radtke, Controller
Glenn R. Molski, Assistant Treasurer
Peter W. Mehlman, Assistant Secretary

The business address of Akzo Nobel Inc. is:

Akzo Nobel Inc.
300 South Riverside Plaza
Chicago, Illinois 60601

e. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information.

With respect to the Somerset, New Jersey manufacturing plant of Akzo Nobel Coatings and from the time period of 1980 to date, the Somerset manufacturing plant as owned by Reliance Universal Inc. (New Jersey Corporation). On January 1, 1990, Reliance Universal Inc. (New Jersey) was merged into Reliance Universal Inc. (Kentucky Corporation). On that same date, Reliance Universal Inc. (Kentucky) was merged in Reliance Holdings Inc., and Reliance Holdings Inc. changed it name to Akzo Wood & Specialty Coatings Inc. On January 1, 1991, Akzo Wood and Specialty Coatings Inc. was merged into Akzo Coatings Inc. Akzo Coatings Inc. changed its name to Akzo Nobel Coatings Inc. on April 22, 1994.

f. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

To the best of its knowledge and business, Akzo Nobel Coatings did not conduct business with Central Steel Drum in a name other than those disclosed above.

2. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

The Somerset, New Jersey manufacturing plant manufactures industrial coatings and paint. The types of coatings and paint fall into two broad categories:

(1) Solvent borne coatings are made by mixing pigments, resins and aliphatic and aromatic hydrocarbons. The raw materials are mixed in tanks and containers to obtain a specified blend, then poured off into bulk tankers or smaller containers (quite often 55 gallon drums).

These coatings and paints are used in the wood coatings, business machine and coil (metal) fabricator industries as a surface coating or paint.

(2) Water borne coatings are made by mixing pigments, resins and water. The raw materials are mixed in tanks and containers to obtain a specified blend, then poured off into bulk tankers or small containers (quite often 55 gallon drums).

These coatings and paints are also used in the wood coatings, business machine and coil (metal) fabricator industries as a surface coating or paint.

The nature of the business has not changed over the period from 1980-1994.

3. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

The operations at the Somerset, New Jersey location may be described in the following way:

The ingredients (called raw materials) used in the manufacturing of the coatings and paints are delivered to the operation in bulk tankers, paper and plastic bags or sacks, and in plastic, metal and fiber containers in various sizes and shapes.

The raw materials are placed in permanent or portable containers and tanks located on the manufacturing floor. The raw materials are then mixed according to a formula. Once the raw materials have reached a formulated specification, the paint or coating (called a finished good or product) is then poured or drained off into another container for shipment to the customer. The finished good or product container may be a bulk tanker, a 240 gallon tote tank, or a smaller container like a 55 gallon drum.

The chemical substances used to clean equipment or machinery is generally a material referred to as "wash solvent", which is primarily acetone or methyl ethyl ketone or a mixture of both.

4. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

a. Akzo Nobel Coatings did contract with Central Steel Drum for the recycling or reconditioning of barrels, drums or other containers. During the course of the recycling or reconditioning transaction, some drums from Akzo Nobel Coatings were considered no longer usable and were defined as scrap.

b. Refer to the answer in question 4(a).

The specific nature of services rendered and products sold to Akzo Nobel Coatings, Somerset, New Jersey can be described as follows:

Central Steel Drum supplied Akzo Nobel Coatings with containers (both new and reconditioned) to be used as containers for the various paint and coating products manufactured at Somerset, New Jersey and

shipped to Akzo's customers. Central Steel Drum would deliver the new or reconditioned containers to the Akzo operation. The new or reconditioned containers were delivered to the Akzo operation in a 40 foot trailer. As the new or reconditioned containers were removed from the trailer, used empty containers that were to be reconditioned were placed on the 40 foot trailer.

Eventually, all of the new or reconditioned containers were removed from the trailer and the trailer was refilled with empty containers that were then picked up and returned to Central Steel Drum for reconditioning and reuse.

c. No written contracts or agreements between Akzo Nobel Coatings, Somerset, New Jersey and CSD were found.

5. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

a. Refer to answers for questions 2 and 3 for the nature of the operation.

Construction of the Akzo Nobel Coatings operation in Somerset, New Jersey began in 1968 and manufacturing began sometime in 1970.

b. Akzo Nobel Coatings Inc.
100 Belmont Drive
Box 389
Somerset, New Jersey 08873-1204

The RCRA ID number is: NJD 00 214 2388

6. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

The information sought by USEPA in this question (#6) can be answered by referring to the documents in Enclosure A.

The Enclosure A documents are copies of credit documentation that Akzo received from CSD for containers that were sent back to CSD for reconditioning. The credit memo from CSD annotates the type and number of drums returned to CSD. Attached to some of the CSD credit memos is a Reliance (Akzo) Bill of Lading. This was, quite often, not an exact count of the drums being sent back to CSD. Akzo used the CSD credit memo to arrive at an accurate count of drums sent to CSD.

a. See Enclosure A.

b. See Enclosure A (summary sheets).

c. See Enclosure A (summary sheets).

d. The purpose of the transaction was to send containers back to CSD for reconditioning.

e. The containers that were the subject of the transaction were empty. They were empty according to the guideline's directives and instructions specified by CSD (see Enclosure B).

In addition, Akzo Nobel Coatings had Safety Operating Procedures (SOP's) at the operation for insuring containers were empty (see Enclosure C).

e(1) Containers were empty.

e(2) Containers were empty.

7. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

Refer to Enclosure A.

8. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

The following person(s) may have knowledge of transactions or may have had responsibility regarding transactions with CSD.

(1) Ron Almquist, Manager of Manufacturing
Akzo Nobel Coatings
100 Belmont Drive
Somerset, NJ 08873-1204
(732) 469-3700

(2) Bill Baumann - previous Plant Supervisor
Address same as above. Current plant employee.

(3) S.P. (Stuart) Colangelo - previous 2nd shift Supervisor
Address same as above. Current - plant employee

(4) Tim Gordon - shipping/receiving
Address same as above.

(5) Carol Kopicki - shipping/receiving
Address same as above.

(6) Tom McLaughlin - Assistant Manufacturing Manager
Address same as above.

(7) Robert D. Scanga, Jr. - previous shipping/receiving
(address unknown)

(8) Robert D. Scanga, Sr. - previous General Manager
Kenmont Company, Inc.
410 Route 10, Suite 206
Ledgewood, NJ 07852
(973) 584-4410

9. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

The empty containers sent to CSD would have contained raw materials used in the manufacturing of industrial coatings and paints. In addition, some of the empty drums sent to CSD would have, at one time, contained finished good products manufactured by Akzo Nobel Coatings - Somerset.

a. Akzo Nobel Coatings has enclosed (refer to Enclosure D) Material Safety Data Sheets that are representative of the types of substances that would have been in the containers prior to being emptied and sent to CSD. The Enclosure D material can be described as follows:

Enclosure D

1) Rhoplex WL-91 Emulsion - This is a water-base resin (liquid) raw material supplied to Akzo in a fiber drum.

2) Hycar 26092 - This is a water-base resin (liquid) raw material supplied to Akzo in a fiber drum.

3) VCAR Vehicle 452 - This is a resin (liquid) raw material supplied to Akzo in a steel drum.

4) DOWANUL PMA Glycol Ether Acetate - This is a solvent raw material supplied to Akzo in a steel drum.

5) Aromatic 100 - This is a solvent blend (liquid) raw material supplied to Akzo in a steel drum.

6) COMPAQ Beach Gray HB water-base - This is a finished good product manufactured by Akzo. This is a water-base coating.

7) RX0101078-R Lacquer Base - This is a finished good product manufactured by Akzo. This is a solvent-base coating.

b. Refer to Enclosure D.

10. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

The procedures for emptying the container is outlined in Enclosure B and Enclosure C. No treatment was performed on the container by Akzo (other than to insure that it was empty) prior to transfer to CSD.

11. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

No third party transporter was employed.

12. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

1) Ron Almquist
(see answer to question #8)

2) Tim Gordon
(see answer to question #8)

3) Tom McLaughlin
(see answer to question #8)

4) Rosemary Ernest - Sales Correspondent & Assistant to the Controller
Akzo Nobel Coatings
100 Belmont Drive
Somerset, New Jersey 08873-1204

5) Edward K. Duplaga - Attorney
Akzo Nobel Coatings
300 South Riverside Plaza
Chicago, IL 60606
(312) 906-7500

- Mr. Almquist and Mr. McLaughlin were consulted on answering questions 2 - 14.

- Mr. Gordon was consulted on answering question #4.

- Ms. Ernest was consulted on answering question #6.

- Mr. Duplaga was consulted on answering question #1.

13. Akzo Nobel Coatings objects to this request in that it is vague, overly broad, harassing and unduly burdensome. Subject to and without waiving this objection, Akzo Nobel Coatings provides the following information:

Jerry Greenberg - Vice President Central Steel Drum
Central Steel Drum
704 Doremus Avenue
Newark, NJ 07105

OR

American Pail & Packaging Co.
704 Doremus Avenue
Newark, NJ 07105

OR

National Drum & Barrel Corporation
18 Division Place
Brooklyn, NY 11222-5199

14. No additional information was found.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Kentucky

County of Jefferson

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.

Douglas W. Butler
NAME (print or type)

Senior Environmental Affairs Manager
TITLE (print or type)

Douglas W. Butler
SIGNATURE

Sworn to me before this
day of 16th January, 1998

Notary Public

Notary Public, State at Large, KY.
My commission expires Apr. 6, 1999

(4)

MATERIAL SAFETY DATA SHEET

HMIS: H2 F2 R0

Date Prepared: 01/07/98
Date Revised : / /

PREPARED FOR:

70000000 AKZO NOBEL COATINGS INC.
100 BELMONT DRIVE

SOMERSET NJ 0873?

RON ALMQUIST

PREPARED BY:

AKZO NOBEL COATINGS - SOMERSET
100 BELMONT DRIVE

SOMERSET NJ 08873?1294

Emergency Phone Number: (908) 469-5700
Information Number: (908) 469-5700

SECTION I - PRODUCT INFORMATION

Tradename:	Product No.	Customer Part No.
NA	7E019	7E019

Product - Class: DOWANOL PMA GLYCOL ETHER ACETATE MII CODE: 999999

SECTION II - HAZARDOUS INGREDIENTS

Hazardous Ingredients	Ingredient Data		
1-METHOXY-2-ACETOXYPROPANE	% by Weight	> 95 %	
	CAS No.	000108-65-6	
	Vapor Pres.	3.4	mm/Hg @ 68F
	TLV-TWA	100.0	ppm
	PEL-TWA	NA	
	ORAL-LD50	8532.	mg/Kg RAT
	DERM-LD50	> 5000.	mg/Kg RABBIT

11 components in this product have been verified as being on the TSCA Inventory.

SECTION III - PHYSICAL DATA

Physical state: LIQUID
Odor and appearance: NA
Odor threshold (ppm): NA
pH: NA

Boiling Range: 295 F (146 C)

Vapor is heavier than Air.

Evaporation rate is slower than ether.
% Volatile (vol) 100.00 Lb/gal(U.S.) 8.04 Sp.Gr: .96

UU: Data Lb/Gal(U.S.):

Less Water (EPA)	8.04	Total Organic Solvents	8.04
Less Water & Exempt (EPA)	8.04	Total Non-Exempt Solvents	8.04
Solvent Density	8.04		

SECTION IV - FIRE AND EXPLOSION HAZARDS DATA

FP: (CLOSED) 108 F (42 C) LEL 1.50%
Flammability Class (OSHA): COMBUSTIBLE LIQUID - 2
This is the OSHA classification, DOT may be different.

XTINGUISHING MEDIA: Foam, Carbon Dioxide or Dry Chemical. damage to upper respiratory tract.

NUSUAL FIRE AND EXPLOSION HAZARDS: During emergency conditions, overexposure to decomposition products (See Section VI - Reactivity Data) may cause a health hazard; symptoms may not be immediately apparent. Obtain medical attention.

PECIAL FIREFIGHTING PROCEDURES: Water may be ineffective in fighting fire. If water is used to cool closed containers to prevent pressure build-up, fog nozzles are preferred. Full protective equipment, including self-contained breathing apparatus is needed to protect firefighters from exposure to coating's hazardous ingredients and hazardous decomposition products.

SECTION V - HEALTH HAZARD DATA AND FIRST AID PROCEDURES

FECTS OF OVEREXPOSURE :

in : CAUSES SKIN IRRITATION.

e : CAUSES EYE IRRITATION. Other effects of eye contact may include : eye damage.

nhalation : N/AP MAY CAUSE LUNG IRRITATION.

kin absorption : CAN BE ABSORBED THROUGH THE SKIN. Effects may include : drowsiness.

ngestion : HARMFUL IF SWALLOWED.

RIMARY ROUTE(S) OF ENTRY: skin contact, ingestion, eyes.

EDICAL CONDITIONS THAT CAN BE AGGRAVATED: N/AV.

HRONIC HEALTH HAZARDS:

epeated OVEREXPOSURE to this product may cause:kidney damage, liver abnormalities, eye damage.

n accordance with 29CFR1910.1200, this product contains no ingredients

listed by NTP, IARC or OSHA as carcinogenic.

ITIE: Reports have associated repeated and prolonged OVEREXPOSURE to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents of this package may be harmful or fatal.

****EMERGENCY AND FIRST AID PROCEDURES*****.

IN CONTACT: Wash with soap and water. Remove contaminated clothing and wash before reuse. Remove and destroy contaminated shoes.

YE CONTACT: Flush with water for at least 15 minutes.

NHALATION: Remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

NGESTION: Get medical attention IMMEDIATELY.

SECTION VI - REACTIVITY DATA

aterial is STABLE under non-emergency conditions.

aterial WILL NOT undergo hazardous polymerization.

AZARDOUS DECOMPOSITION PRODUCTS: oxides of carbon, various hydrocarbons.

NDITIONS TO AVOID: heat, open flame, sparks.

ATERIALS TO AVOID: oxidizers.

SECTION VII - SPILL AND LEAK PROCEDURES

TEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Wear appropriate safety equipment as listed in Section VIII. Absorb on inert material and dispose of as below.

ASTE DISPOSAL METHODS: Dispose of in accordance with FEDERAL, STATE and local regulations. Incineration is the preferred method of disposal.

SECTION VIII - SAFE HANDLING AND USE INFORMATION

ESPIRATORY PROTECTION: Wear an appropriate, properly fitted respirator (NIOSH/MSHA approved) during application and handling where vapor/mist are encountered in the breathing zone. Follow respirator manufacturer's recommendation for selection and use.

ENTILATION: Sufficient ventilation should be provided to control vapor/mist levels.

ROTECTIVE GLOVES: Chemical resistant protective gloves should be worn when handling this product. Check with glove manufacturer to determine

proper glove type.

YE PRUTECTIUN: Splash-proof chemical goggles should be worn.

THER PRUTECTIVE EWUIPMENT: Eye bath and safety shower should be provided. Suitable clothing should be worn to prevent skin contact.

YGIENIC PRACTICES: Good personal hygiene practices are required at all times when handling chemicals. These practices include, but are not limited to, washing when safety equipment is removed, at the end of each shift or when going on breaks and especially if contamination occurs.

SECTIUN IX - SPECIAL PRECAUTIUNS

RECAUTIUNS TU BE TAKEN IN HANDLING AND STURAGE: Store in well-ventilated area. All equipment should be grounded. Keep containers closed when not in use. Store in a clean, dry area. Store away from ignition sources.

THER PRECAUTIUNS: All precautions must be observed. Empty container may retain product residues.

SECTIUN X - UTHER INFURMATIUN

ne absence of a positive finding indicates that we believe, to the best of our knowledge, that the negative is true.

isclaimer: While Akzo Nobel Coatings believes that the data contained herein are accurate and derived from qualified sources, the data are not to be taken as a warranty or representation for which Akzo Nobel Coatings assumes legal responsibility. They are offered solely for your consideration, investigation and verification. Any use of these data and information must be determined by the user to be in accordance with applicable Federal, State, Provincial and local laws and regulations.

ll Proper Shipping Classification -
BBREVIATIUNS USED IN PREPARING THIS MSDS:
IMIS - Workplace Hazardous Materials Information System
CA - Toxic Substances Control Act
R - Code of Federal Regulations
g/M3 - Milligrams per Meter Cubed
L - Lower Explosion Limit
- Flash Point
g/gal - Pounds Per Gallon
A - Not Available or Non-applicable
g/L - Milligrams Per Liter
pm - Parts Per Million
m/Hg - Millimeters of Mercury
- Fahrenheit
- Greater than < - Less than
- Percent
- Pounds
AS NU - Chemical Abstract Number
MIS - Hazardous Material Information System

ORAL-LD50 - Oral Lethal Dose (50% Death)
INHAL-LC50 - Inhalation Lethal Concentration (50% Death)
DERM-LD50 - Dermal Lethal Dose (50% Death)
PEL - Permissable Exposure Limit
TLV - Threshold Limit Value
STEL - Short Term Exposure Limit
CEIL - Ceiling Limit
 - At
OSHA - Occupational Safety and Health Administration
IARC - International Agency for Research on Cancer
NTP - National Toxicology Program
SARA - SuperFund Amendments & Reauthorization Act (1986)
DOT - Department of Transportation

(5)

MATERIAL SAFETY DATA SHEET

HMIS: H2 F2 R1

Date Prepared: 01/02/98
Date Revised : / /

PREPARED FOR:

PREPARED BY:

/0000000U AKZO NOBEL COATINGS INC.
100 BELMONT DRIVE

AKZO NOBEL COATINGS - SOMERSET
100 BELMONT DRIVE

SOMERSET NJ 0887/3

SOMERSET NJ 0887/31294

RON ALMQUIST

Emergency Phone Number: (908) 469-3/00
Information Number: (908) 469-3/01

SECTION I - PRODUCT INFORMATION

Tradename:	Product No.	Customer Part No.
NA	/R1005	/R1005

Product - Class: AROMATIC 100 MII CODE: 999999

SECTION II - HAZARDOUS INGREDIENTS

Hazardous Ingredients	Ingredient Data		
AROMATIC SOLVENT	% by Weight	55 - 65 %	
	Cas No.	- -	
	Vapor Pres.	NA	
	TLV-TWA	100.0	ppm
	PEL-TWA	NA	
1,2,4-TRIMETHYLBENZENE	% by Weight	32.0 %	
	Cas No.	000095-63-6	
	Vapor Pres.	NA	
	TLV-TWA	25.0	ppm
	PEL-TWA	25.0	ppm
	ORAL-LD50	5000.	mg/Kg RAT
	INHAL-LC50	18000.	mg/m3 RAT-4 HOUR
XYLENE, MIXED ISOMERS	% by Weight	5.0 %	
	Cas No.	001330-20-7	
	Vapor Pres.	5.1	mm/Hg @ 68F
	TLV-TWA	100.0	ppm
	PEL-TWA	100.0	ppm
	TLV-STEL	150.0	ppm 15 MINUTES
	ORAL-LD50	4300.	mg/Kg RAT
	DERM-LD50	> 1700.	mg/Kg RABBIT
	INHAL-LC50	5000.	ppm RAT-4 HOUR
CUMENE	% by Weight	1.5 %	
	Cas No.	000098-82-8	
	Vapor Pres.	NA	

REV DATE: / /

TLV-TWA	50.0	ppm*
PEL-TWA	50.0	ppm*
ORAL-LD50	1400.	mg/Kg RAT
DERM-LD50	10617.	mg/Kg RABBIT
INHAL-LC50	8000.	ppm RAT-4 HOUR

This material is subject to reporting under SARA TITLE III, SECTION 313

All components in this product have been verified as being on the TSCA Inventory.

* TOXIC EFFECTS CAN OCCUR BY SKIN ABSORPTION.

SECTION III - PHYSICAL DATA

Physical state: LIQUID
Odor and appearance: NA
Odor threshold (ppm): .1320
pH: NA

Boiling Range: 318 - 338 F (158 - 170 C)

Vapor is heavier than Air.

Evaporation rate is slower than ether.

% Volatile (vol) 100.00 Lb/gal(U.S.) 7.25 SpGr: .87

VOC Data Lb/Gal(U.S.):

Less Water (EPA)	7.25	Total Organic Solvents	7.25
Less Water & Exempt (EPA)	7.25	Total Non-Exempt Solvents	7.25
Solvent Density	7.25		

SECTION IV - FIRE AND EXPLOSION HAZARDS DATA

FP: (CLOSED) 108 F (42 C) LEL 1.90%
Flammability Class (OSHA): COMBUSTIBLE LIQUID - 2
This is the OSHA classification, DOT may be different.

EXTINGUISHING MEDIA: Foam, Carbon Dioxide or Dry Chemical.

UNUSUAL FIRE AND EXPLOSION HAZARDS: During emergency conditions, overexposure to decomposition products (See Section VI - Reactivity Data) may cause a health hazard; symptoms may not be immediately apparent. Obtain medical attention.

SPECIAL FIREFIGHTING PROCEDURES: Water may be ineffective in fighting fire. If water is used to cool closed containers to prevent pressure build-up, fog nozzles are preferred. Full protective equipment, including self-contained breathing apparatus is needed to protect firefighters from exposure to coating's hazardous ingredients and hazardous decomposition products.

SECTION V - HEALTH HAZARD DATA AND FIRST AID PROCEDURES

EFFECTS OF OVEREXPOSURE :

Skin : CAUSES SKIN IRRITATION. Other effects of skin contact may include : dermatitis.

Eye : CAUSES EYE IRRITATION.

Inhalation : MAY CAUSE NOSE AND THROAT IRRITATION. MAY CAUSE LUNG IRRITATION. Other effects of inhalation may include : nausea, shortness of breath, dehydration, dizziness, weakness, headache, fatigue, depression.

Skin absorption : Effects may include : headache, depression.

Ingestion : HARMFUL IF SWALLOWED. Other effects of ingestion may include : gastric disturbances, nausea, vomiting, diarrhea, weakness, headache, dizziness, fatigue, depression.

PRIMARY ROUTE(S) OF ENTRY: Inhalation, skin contact, ingestion, eyes.

MEDICAL CONDITIONS THAT CAN BE AGGRAVATED: N/AV.

CHRONIC HEALTH HAZARDS:

Repeated OVEREXPOSURE to this product may cause:cardiac abnormalities.

In accordance with 29CFR1910.1200, this product contains no ingredients listed by NTP, IARC or OSHA as carcinogenic.

NOTICE: Reports have associated repeated and prolonged OVEREXPOSURE to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents of this package may be harmful or fatal.

*****EMERGENCY AND FIRST AID PROCEDURES*****.

SKIN CONTACT: Wash with soap and water. Remove contaminated clothing and wash before reuse. Remove and destroy contaminated shoes.

EYE CONTACT: Flush with water for at least 15 minutes and get medical attention.

INHALATION: Remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

INGESTION: Get medical attention IMMEDIATELY.

SECTION VI - REACTIVITY DATA

aterial is STABLE under non-emergency conditions.

aterial WILL NOT undergo hazardous polymerization.

AZARDOUS DECOMPOSITION PRODUCTS: oxides of carbon, fumes, various hydrocarbons, aldehydes.

NDITIONS TO AVOID: heat, open flame, sparks.

ATERIALS TO AVOID: oxidizers.

SECTION VII - SPILL AND LEAK PROCEDURES

TEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Remove all sources of ignition. Wear appropriate safety equipment as listed in Section VIII; assume for all hazardous ingredients listed in Section II, that the TLV, PEL and LEL limits will be exceeded. Absorb on inert material and dispose of as below.

ASTE DISPOSAL METHODS: Dispose of in accordance with FEDERAL, STATE and local regulations. Incineration is the preferred method of disposal.

SECTION VIII - SAFE HANDLING AND USE INFORMATION

ESPIRATORY PROTECTION: Wear an appropriate, properly fitted respirator (NIOSH/MSHA approved) during application and handling unless air monitoring demonstrates vapor/mist levels below applicable limits. Follow respirator manufacturer's recommendations for selection and use.

NTILATION: Sufficient ventilation must be provided to maintain airborne concentrations below TLV, PEL and LEL limits as listed in Section II.

OTECTIVE GLOVES: Chemical resistant protective gloves should be worn when handling this product. Check with glove manufacturer to determine proper glove type.

YE PROTECTION: Splash-proof chemical goggles should be worn.

THER PROTECTIVE EQUIPMENT: Eye bath and safety shower should be provided. Rubber apron should be worn.

YGIENIC PRACTICES: Good personal hygiene practices are required at all times when handling chemicals. These practices include, but are not limited to, washing when safety equipment is removed, at the end of each shift or when going on breaks and especially if contamination occurs.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:Store in well-ventilated area. All equipment should be grounded. Keep containers closed when not in use. Store in a clean, dry area. Store away from ignition sources.

OTHER PRECAUTIONS: All precautions must be observed. Empty container may retain product residues.

This product contains the following SARA Title III, Section 313, reportable materials: cumene, xylene (mixed isomers), trimethylbenzene.

SECTION X - OTHER INFORMATION

The absence of a positive finding indicates that we believe, to the best of our knowledge, that the negative is true.

Disclaimer: While Akzo Nobel Coatings believes that the data contained herein are accurate and derived from qualified sources, the data are not to be taken as a warranty or representration for which Akzo Nobel Coatings assumes legal responsibility. They are offered solely for your consideration, investigation and verification. Any use of these data and information must be determined by the user to be in accordance with applicable Federal, State, Provincial and local laws and regulations.

II Proper Shipping Classification -
ABBREVIATIONS USED IN PREPARING THIS MSDS:
WHMIS - Workplace Hazardous Materials Information System
TSCA - Toxic Substances Control Act
CFR - Code of Federal Regulations
mg/M3 - Milligrams per Meter Cubed
LEL - Lower Explosion Limit
FP - Flash Point
lb/gal - Pounds Per Gallon
NA - Not Available or Non-applicable
mg/l - Milligrams Per Liter
ppm - Parts Per Million
mm/Hg - Millimeters of Mercury
F - Fahrenheit
> - Greater Than < - Less Than
% - Percent
# - Pounds
CAS NO - Chemical Abstract Number
HMIS - Hazardous Material Information System
ORAL-LD50 - Oral Lethal Dose (50% Death)
INHAL-LC50 - Inhalation Lethal Concentration (50% Death)
DERM-LD50 - Dermal Lethal Dose (50% Death)
PEL - Permissable Exposure Limit
TLV - Threshold Limit Value
STEL - Short Term Exposure Limit
CEIL - Ceiling Limit
@ - At

OSHA - Occupational Safety and Health Administration
IARC - International Agency for Research on Cancer
NTP - National Toxicology Program
SARA - Superfund Amendments & Reauthorization Act (1986)
DOT - Department of Transportation

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MATERIAL SAFETY DATA SHEET

HMIS: H3* F2 R0

Date Prepared: 01/01/98
Date Revised : 12/21/97

PREPARED FOR:

/00000019 AKZO COATINGS, INC.
1000 INDUSTRIAL PARK

CLIFTON, MS 39056

PREPARED BY:

AKZO NOBEL COATINGS - SOMERSET
100 BELMONT DRIVE

SOMERSET NJ 08873/31294

Emergency Phone Number: (908) 469-3700
Information Number: (908) 469-3700

SECTION I - PRODUCT INFORMATION

Tradename:	Product No.	Customer Part No.
NA	447-FE1-2053	

Product - Class: COMPANY BEACH GRAY HB WATERBASE MFI CODE: 999999

SECTION II - HAZARDOUS INGREDIENTS

Hazardous Ingredients	Ingredient Data		
TITANIUM DIOXIDE	%% by Weight	15 - 25 %	
	CAS No.	013463-67-7	
	Vapor Pres.	NA	
	TLV-TWA	10.0	mg/m3
	PEL-TWA	15.0	mg/m3
QUARTZ	%% by Weight	10 - 15 %	
	CAS No.	014808-60-7	
	Vapor Pres.	NA	
	TLV-TWA	.1000	mg/m3
	PEL-TWA	.1000	mg/m3
ETHYL ALCOHOL	%% by Weight	5 - 10 %	
	CAS No.	000064-17-5	
	Vapor Pres.	41.4	mm/Hg @ 68F
	TLV-TWA	1000.0	ppm
	PEL-TWA	1000.0	ppm
	ORAL-LD50	7060.	mg/Kg RAT
	DERM-LD50	20000.	mg/Kg RABBIT
	INHAL-LC50	20000.	ppm RAT-10 HOUR
METHYLATED M/F RESIN	%% by Weight	5 - 10 %	
	CAS No.	068002-20-0	
	Vapor Pres.	NA	
	TLV-TWA	NA	
	PEL-TWA	NA	
	ORAL-LD50	12500.	mg/Kg RAT

	DERM-LD50	>10000.	mg/Kg RABBIT
SEC-BUTANOL	% by Weight	5.6 %	
	Cas No.	00110-98-2	
	Vapor Pres.	12.0	mm/Hg @ 68F
	TLV-TWA	100.0	ppm
	PEL-TWA	150.0	ppm
	ORAL-LD50	6480.	mg/Kg RAT
AMORPHOUS FUMED SILICA	% by Weight	1 - 5 %	
	Cas No.	112945-52-5	
	Vapor Pres.	NA	
	TLV-TWA	10.0	mg/m3
	PEL-TWA	15.0	mg/m3
	ORAL-LD50	5160.	mg/Kg RAT
2-BUTOXYETHANOL (ETHYLENE GLYCOL BUTYL ETHER)	% by Weight	1.5 %	
	Cas No.	000111-76-2	
	Vapor Pres.	.6	mm/Hg @ 68F
	TLV-TWA	25.0	ppm*
	PEL-TWA	50.0	ppm*
	ORAL-LD50	470.	mg/Kg RAT
	DERM-LD50	220.	mg/Kg RABBIT
	INHAL-LC50	450.	ppm RAT-4 HOUR

This material is subject to reporting under SARA TITLE III, SECTION 313

All components in this product have been verified as being on the TSCA Inventory.

* TOXIC EFFECTS CAN OCCUR BY SKIN ABSORPTION.

SECTION III - PHYSICAL DATA

Physical state: LIQUID
Odor and appearance: NA
Odor threshold (ppm): .1000
pH: 8.5 - 9.0

Boiling Range: 174 - 341 F (78 - 171 C)

Vapor is heavier than Air.

Evaporation rate is slower than ether.

% Volatile (vol) 56.80 Lb/gal(U.S.)10.75 SpGr: 1.29

VOC Data Lb/Gal(U.S.):

Less Water (EPA)	1.98	Total Organic Solvents	1.21
Less Water & Exempt (EPA)	1.98	Total Non-Exempt Solvents	1.21

Solvent Density 6.78

SECTION IV - FIRE AND EXPLOSION HAZARDS DATA

FP: (CLOSED) 142 F (61 C) LEL 1.70%
Flammability Class (OSHA): COMBUSTIBLE LIQUID - 3A
This is the OSHA classification, DOT may be different.

EXTINGUISHING MEDIA: Foam, Carbon Dioxide or Dry Chemical.

UNUSUAL FIRE AND EXPLOSION HAZARDS: During emergency conditions, overexposure to decomposition products (See Section VI - Reactivity Data) may cause a health hazard; symptoms may not be immediately apparent. Obtain medical attention.

SPECIAL FIREFIGHTING PROCEDURES: Water may be ineffective in fighting fire. If water is used to cool closed containers to prevent pressure build-up, fog nozzles are preferred. Full protective equipment, including self-contained breathing apparatus is needed to protect firefighters from exposure to coating's hazardous ingredients and hazardous decomposition products.

SECTION V - HEALTH HAZARD DATA AND FIRST AID PROCEDURES

EFFECTS OF OVEREXPOSURE :

Skin : CAUSES SKIN IRRITATION. Other effects of skin contact may include : dermatitis, necrosis.

Eye : CAUSES EYE BURNS. Other effects of eye contact may include : eye damage, tearing, redness, swelling.

Inhalation : CAUSES NOSE AND THROAT IRRITATION. MAY CAUSE LUNG INJURY AND/OR BURNS. Other effects of inhalation may include : nausea, cough, shortness of breath, wheezing, dizziness, headache, anesthesia, drowsiness, chest pain, vomiting, CNS effects, incoordination.

Skin absorption : CAN BE ABSORBED THROUGH THE SKIN. Effects may include : headache, nausea, dizziness, weakness, incoordination, blood effects.

Ingestion : HARMFUL IF SWALLOWED. Other effects of ingestion may include : nausea, vomiting, diarrhea, weakness, headache, dizziness, drowsiness, incoordination, blood effects.

PRIMARY ROUTE(S) OF ENTRY: inhalation, skin contact, ingestion, eyes.

MEDICAL CONDITIONS THAT CAN BE AGGRAVATED: pulmonary conditions, skin disorders.

CHRONIC HEALTH HAZARDS:

Repeated OVEREXPOSURE to this product may cause:central nervous system damage, kidney damage, liver abnormalities, lung damage, blood effects, eye damage.

SUTION: Contains quartz/crystalline silica which has been shown to cause cancer in laboratory animals by inhalation and is listed as a suspect carcinogen by IARC (Group-2A). Contains a melamine-formaldehyde resin which, under certain conditions, could release formaldehyde in quantities sufficient to require monitoring under OSHA regulations. Formaldehyde is a suspect carcinogen.

ITIES: Reports have associated repeated and prolonged OVEREXPOSURE to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents of this package may be harmful or fatal.

*****EMERGENCY AND FIRST AID PROCEDURES*****

KIN CONTACT: Flush with plenty of water. Remove contaminated clothing and wash before reuse. Remove and destroy contaminated shoes.

YE CONTACT: Flush with water for at least 15 minutes and get medical attention.

NHALATION: Remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

GESTION: Get medical attention IMMEDIATELY.

SECTION VI - REACTIVITY DATA

aterial is STABLE under non-emergency conditions.

aterial WILL NOT undergo hazardous polymerization.

AZARDOUS DECOMPOSITION PRODUCTS: oxides of carbon, oxides of nitrogen, toxic fumes, various hydrocarbons, ammonia, formaldehyde.

NDITIONS TO AVOID: temperatures above 120 degrees, open flame, sparks.

ATERIALS TO AVOID: alkali, acids, oxidizers, fluorine, hydrogen fluoride, amines, chlorinated solvents, aldehydes, alkanolamines, ammonia, manganese trioxide.

SECTION VII - SPILL AND LEAK PROCEDURES

TEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Remove all sources of ignition. Wear appropriate safety equipment as listed in Section VIII; assume for all hazardous ingredients listed in Section II, that the IDLH, PEL and LEL limits will be exceeded. Absorb on inert material and dispose of as below.

ASTE DISPOSAL METHODS: Dispose of in accordance with FEDERAL, STATE and local regulations. Incineration is the preferred method of disposal.

SECTION VIII - SAFE HANDLING AND USE INFORMATION

RESPIRATORY PROTECTION: Wear an appropriate, properly fitted respirator (NIOSH/MSHA approved) during application and handling unless air monitoring demonstrates vapor/mist levels below applicable limits. Follow respirator manufacturer's recommendations for selection and use.

VENTILATION: Sufficient ventilation must be provided to maintain airborne concentrations below TLV, PEL and LEL limits as listed in Section II.

PROTECTIVE GLOVES: Chemical resistant protective gloves should be worn when handling this product. Check with glove manufacturer to determine proper glove type.

EYE PROTECTION: Face-shield should be worn.

OTHER PROTECTIVE EQUIPMENT: Eye bath and safety shower should be provided. Rubber apron should be worn.

HYGIENIC PRACTICES: Good personal hygiene practices are required at all times when handling chemicals. These practices include, but are not limited to, washing when safety equipment is removed, at the end of each shift or when going on breaks and especially if contamination occurs.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:Store in well-ventilated area. All equipment should be grounded. Keep containers closed when not in use. Store in a clean, dry area. Store below 120 degrees Fahrenheit. Store away from ignition sources. DO NOT ALLOW TO FREEZE. Avoid exposure to light.Store away from open flame.

OTHER PRECAUTIONS: All precautions must be observed. Empty container may retain product residues.

This product contains the following SARA Title III, Section 313, reportable materials: sec-butyl alcohol, glycol ether.

SECTION X - OTHER INFORMATION

The absence of a positive finding indicates that we believe, to the best of our knowledge, that the negative is true.

Disclaimer: While Akzo Nobel Coatings believes that the data contained herein are accurate and derived from qualified sources, the data are not to be taken as a warranty or representation for which Akzo Nobel Coatings assumes legal responsibility. They are offered solely for your consideration, investigation and verification. Any use of these data and information must be determined by the user to be in accordance with applicable Federal, State, Provincial and local laws and regulations.

DOT Proper Shipping Classification - NOT REGULATED, .

BBREVIATIONS USED IN PREPARING THIS MSDS:
HMIS - Workplace Hazardous Materials Information System
SCA - Toxic Substances Control Act
FR - Code of Federal Regulations
g/M3 - Milligrams per Meter Cubed
EL - Lower Explosion Limit
P - Flash Point
b/gal - Pounds Per Gallon
A - Not Available or Non-applicable
g/L - Milligrams Per Liter
pm - Parts Per Million
m/Hg - Millimeters of Mercury
 - Fahrenheit
 - Greater Than < - Less Than
 - Percent
 - Pounds
AS NU - Chemical Abstract Number
MIS - Hazardous Material Information System
RAL-LD50 - Oral Lethal Dose (50% Death)
NHAL-LC50 - Inhalation Lethal Concentration (50% Death)
RM-LD50 - Dermal Lethal Dose (50% Death)
EL - Permissable Exposure Limit
LV - Threshold Limit Value
TEL - Short Term Exposure Limit
EIL - Ceiling Limit
 - At
SHA - Occupational Safety and Health Administration
ARC - International Agency for Research on Cancer
TP - National Toxicology Program
ARA - Superfund Amendments & Reauthorization Act (1986)
OT - Department of Transportation

Sales NO.: 50-C3-260 RX-101078-R LACQUER BASE
Formula NO.: 50-C3-260 RX-101078-R LACQUER BASE

(7) Section

MATERIAL SAFETY DATA SHEET

HMIS: H2 F3 R0

Revised Date : 01/02/97

SECTION I - PRODUCT INFORMATION

Tradename:	Product No.	Customer Part No.
NA	50-C3-260A	

Product - Class: RX-101078-R LACQUER BASE

SECTION II - HAZARDOUS INGREDIENTS

Hazardous Ingredients	Desc.	Value	Unit	Comments
ETHYL ALCOHOL	% by Weight	46.6%		
	CAS #	000064-17-5		
	Vapor Pres.	41.4@68F	mm/Hg	
	TLV-TWA	1000.0	ppm	
	PEL-TWA	1000.0	ppm	
	ORAL-LD50	7060.	mg/Kg	RAT
	DERM-LD50	20000.	mg/Kg	RABBIT

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Sales NO.: 50-C3-260 RX-101078-R LACQUER BASE
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NITROCELLULOSE (GUN COTTON)	INHAL-LC50	20000.	ppm	RAT-10 HOU
	% by Weight	29.5%		
	CAS #	009004-70-0		
	Vapor Pres.	NA		
	TLV-TWA	NA		
	PEL-TWA	NA		
	ORAL-LD50	> 5000.	mg/Kg	RAT
ISOPROPANOL (ISOPROPYL ALCOHOL)	% by Weight	15.0%		
	CAS #	000067-63-0		
	Vapor Pres.	32.8@68F	mm/Hg	
	TLV-TWA	400.0	ppm	
	PEL-TWA	400.0	ppm	
	TLV-STEL	500.0	ppm	15 MINUTES
	ORAL-LD50	5045.	mg/Kg	RAT
	DERM-LD50	12800.	mg/Kg	RABBIT
	INHAL-LC50	16000.	ppm	RAT-8 HOUR
ETHYL ACETATE	% by Weight	8.9%		
	CAS #	000141-78-6		
	Vapor Pres.	76.0@68F	mm/Hg	
	TLV-TWA	400.0	ppm	

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. Sales NO.: 50-C3-260 RX-101078-R LACQUER BASE
Formula NO.: 50-C3-260 RX-101078-R LACQUER BASE

			Section
PEL-TWA	400.0	ppm	
ORAL-LD50	5620.	mg/Kg	RAT
DERM-LD50	>18031.	mg/Kg	RABBIT
INHAL-LC50	1600.	ppm	RAT-8 HOUR

All components in this product have been verified as being on the TSCA Inventory.

SECTION III - PHYSICAL DATA

Physical State: LIQUID
Odor and appearance: NA
Odor threshold (ppm): 6.4000
pH: NA
Boiling Range: 168 - 181 F (75 - 82 C)
Vapor is heavier than air.
Evaporation rate is slower than ether.
% Volatile (Vol) 83.68 Lb/gal(U.S.) 7.92 SpGr: .95
VOC Data Lb/Gal(U.S):
Less Water (EPA) 5.59 Total Organic Solvents 5.59
Less Water & Exempt(EPA) 5.59 Total Non-Exempt Solvents 5.59
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, Sales NO.: 50-C3-260 RX-101078-R LACQUER BASE
Formula NO.: 50-C3-260 RX-101078-R LACQUER BASE Section
Solvent Density: 6.67

SECTION IV - FIRE AND EXPLOSION HAZARDS DATA

FP: CLOSED 24 F (-4 C) LEL 2.20%
Flammability Class (OSHA): FLAMMABLE LIQUID - 1B
EXTINGUISHING MEDIA: Foam, Carbon Dioxide or Dry Chemical.
UNUSUAL FIRE AND EXPLOSION HAZARDS: During emergency conditions, overexposure to decomposition products (See Section VI - Reactivity Data) may cause a health hazard; symptoms may not be immediately apparent. Obtain medical attention.
SPECIAL FIREFIGHTING PROCEDURES: Water may be ineffective in fighting fire. If water is used to cool closed containers to prevent pressure build-up, fog nozzles are preferred. Full protective equipment, including self-contained breathing apparatus is needed to protect firefighters from exposure to coating's hazardous ingredients and hazardous decomposition products.

SECTION V - HEALTH HAZARD DATA AND FIRST AID PROCEDURES

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EFFECTS OF OVEREXPOSURE :

Skin : CAUSES SKIN IRRITATION. Other effects of skin contact may include : dermatitis, dehydration.

Eye : CAUSES EYE IRRITATION.

Inhalation : MAY CAUSE NOSE AND THROAT IRRITATION. MAY CAUSE LUNG IRRITATION. Other effects of inhalation may include : nausea, dizziness, weakness, headache, drowsiness, fatigue, CNS effects, incoordination.

Skin absorption : CAN BE ABSORBED THROUGH THE SKIN.

Ingestion : HARMFUL IF SWALLOWED. Other effects of ingestion may include : gastroenteritis, nausea, vomiting, diarrhea, drowsiness, incoordination.

PRIMARY ROUTE(S) OF ENTRY: inhalation, skin contact, eyes.

MEDICAL CONDITIONS THAT CAN BE AGGRAVATED: N/AV.

CHRONIC HEALTH HAZARDS:

Repeated OVEREXPOSURE to this product may cause:central nervous system damage, kidney damage, liver abnormalities, lung damage, reproductive organ damage, blood effects.

In accordance with 29CFR1910.1200, this product contains no ingredients listed by NTP, IARC or OSHA as carcinogenic.

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Sales NO.: 50-C3-260 RX-101078-R LACQUER BASE
Formula NO.: 50-C3-260 RX-101078-R LACQUER BASE Section

NOTICE: Reports have associated repeated and prolonged OVEREXPOSURE to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents of this package may be harmful or fatal.

*****EMERGENCY AND FIRST AID PROCEDURES*****.

SKIN CONTACT: Flush with plenty of water. Remove contaminated clothing and wash before reuse. Remove and destroy contaminated shoes.

EYE CONTACT: Flush with water for at least 15 minutes and get medical attention.

INHALATION: Remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

INGESTION: Get medical attention IMMEDIATELY.

SECTION VI - REACTIVITY DATA

Material is STABLE under non-emergency conditions.

Material WILL NOT undergo hazardous polymerization.

HAZARDOUS DECOMPOSITION PRODUCTS: oxides of carbon, oxides of nitrogen. hydrogen cyanide, toxic fumes, various hydrocarbons, aldehydes,

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acids, peroxides.

CONDITIONS TO AVOID: heat, open flame, sparks, light.
MATERIALS TO AVOID: alkali, acids, oxidizers, amines.

SECTION VII - SPILL AND LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Remove all sources of ignition. Wear appropriate safety equipment as listed in Section VIII; assume for all hazardous ingredients listed in Section II, that the TLV, PEL and LEL limits will be exceeded. Absorb on inert material and dispose of as below.

WASTE DISPOSAL METHODS: Dispose of in accordance with FEDERAL, STATE and local regulations. Incineration is the preferred method of disposal.

SECTION VIII - SAFE HANDLING AND USE INFORMATION

RESPIRATORY PROTECTION: Wear an appropriate, properly fitted respirator (NIOSH/MSHA approved) during application and handling unless air monitoring demonstrates vapor/mist levels below applicable limits.

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Sales NO.: 50-C3-260 RX-101078-R LACQUER BASE
Formula NO.: 50-C3-260 RX-101078-R LACQUER BASE Section

Follow respirator manufacturer's recommendations for selection and use.

VENTILATION: Sufficient ventilation must be provided to maintain airborne concentrations below TLV, PEL and LEL limits as listed in Section II.

PROTECTIVE GLOVES: As a general practice, protective gloves should be worn when handling this product. Check with glove manufacturer to determine proper glove type.

EYE PROTECTION: Splash-proof chemical goggles should be worn.

OTHER PROTECTIVE EQUIPMENT: Eye bath and safety shower should be provided. Rubber apron should be worn.

HYGIENIC PRACTICES: Good personal hygiene practices are required at all times when handling chemicals. These practices include, but are not limited to, washing when safety equipment is removed, at the end of each shift or when going on breaks and especially if contamination occurs.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:Store in well-ventilated

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Section

area. All equipment should be grounded. Keep containers closed when not in use. Store in a clean, dry area. Store away from ignition sources. Avoid exposure to light.Avoid strong oxidizing agents.

OTHER PRECAUTIONS: All precautions must be observed. Empty container may retain product residues.

This product contains the following California Proposition 65 suspect carcinogens: acetaldehyde.

SECTION X - OTHER INFORMATION

The absence of a positive finding indicates that we believe, to the best of our knowledge, that the negative is true.

Disclaimer: While Akzo Nobel Coatings believes that the data contained herein are accurate and derived from qualified sources, the data are not to be taken as a warranty or representration for which Akzo Nobel Coatings assumes legal responsibility. They are offered solely for your consideration, investigation and verification. Any use of these data and information must be determined by the user to be in accordance with applicable Federal, State, Provincial and

139 Press F3 for the Next Page or F5 for Next Inquiry.

Sales NO.: 50-C3-260 RX-101078-R LACQUER BASE
Formula NO.: 50-C3-260 RX-101078-R LACQUER BASE Section
local laws and regulations.
DOT Proper Shipping Classification - NitrocelluloseSolFlammable, 3, UN2059, II

189 Enter Sales Number or Formula Number and an optional Section Number.

AMERICAN INKS AND COATINGS CORP.
LOCATIONS: VALLEY FORGE, PA • RICHMOND, VA • FLORENCE, KY • WINSTON-SALEM, N.C.

January 19, 1998

Ms. Suzanne Becker
Removal Action Branch
Emergency and Remedial Response Division
USEPA, Region II
2890 Woodbridge Avenue
Edison, NJ 08837

RE: Responses of American Inks and Coatings Corp. to Request for Information Pursuant to Section 104 (e) of CERCLA; Central Steel Drum Superfund Site, Newark, Essex County, New Jersey

Dear Ms. Becker:

I have enclosed the responses of American Inks and Coatings Corp. to the Environmental Protection Agency's request for information concerning the Central Steel Drum Superfund Site in Newark, New Jersey. The responses include six pages of written answers to your questions plus two schedules of information concerning transactions between American Inks and Coatings Corp. and Central Steel Drum.

I have also enclosed a large packet of documents for the transactions which are summarized in schedules A and B in our responses to your request for information. There is one packet of documents which includes American Inks' purchase orders directed to Central Steel Drum. There are four additional bundles of documents which include the transactions for the years 1990 through 1993. In each bundle there are a number of separate packets of documents. Each packet comprises a series of documents relating to individual transactions. For each transaction the packet may include an invoice from Central Steel Drum, one or two copies of a Central Steel Drum bill of lading, and a receiving record from American Inks and Coatings with respect to that transaction. Some packets also include an additional set of documents which includes a bill of lading from American

Inks and Coatings to Central Steel Drum and Central Steel Drum's credit memo indicating receipt of drums to be recycled or disposed. These packets are arranged in the same manner as they are kept in our purchasing office.

I hope you will find these responses satisfactory.

Very truly yours,

William P. Rimel, III
President & Chief Executive Officer

WPR:pm
cc: Michael van Itallie, Esquire
Office of Regional Counsel
USEPA, Region II
290 Broadway, 17th Floor
New York, NY 10007

AMERICAN INKS AND COATINGS CORP.'S
RESPONSES TO EPA REQUEST FOR INFORMATION
CENTRAL STEEL DRUM SUPERFUND SITE

General Information About your Company

1.a. State the correct legal name of the Company.

Answer: American Inks and Coatings Corp.

1.b. Identify the legal status of the Company (corporation, partnership, sole proprietorship, specify if other) and the state in which the Company was organized.

Answer: Pennsylvania Corporation

1.c. State the name(s) and address(es) of the officers of the Company.

Answer:

William P. Rimel, III
President and Chief Executive Officer
P. O. Box 803
Valley Forge, PA 19482
610-272-8866

Mary Jane Wagner
Treasurer and Secretary
P. O. Box 803
Valley Forge, PA 19482
610-272-8866

1.d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officers of those organizations. Provide such information for any further parent/subsidiary relationships.

Answer: No subsidiaries or affiliates.

1.e. If the Company is a successor to, or has been succeeded by, another company, identify such other company and provide the same information requested above for the predecessor or successor company.

Answer: The Company is not a successor to another Company.

1.f. If the Company transacted business with Central Steel Drum in the name of an entity not disclosed above, give the name of such entity and state its relationship to the Company.

Answer: All transactions with Central Steel Drum ("CSD") in the name of American Inks and Coatings Corp.

2. Describe in detail the nature of your Company during the years 1980-1994. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.

Answer: American Inks is a closely held corporation located at 330 Pawlings Road, Schuylkill Township, Valley Forge, Chester County, Pennsylvania. It manufactures graveure printing inks at that location which are primarily sold in the Eastern United States.

3. Briefly describe your Company's operations. Also, identify any chemical substances used to clean equipment or machinery.

Answer: Manufactures graveure printing ink, both water based and solvent based, at its plant in Valley Forge, Pennsylvania. The equipment is cleaned with mixtures of various solvents.

Company's Relationship to Central Steel Drum (CSD)

4.a. State whether the Company or any Company facility transacted any business with CSD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

Answer: Yes.

4.b. If so, describe the relationship (nature of services rendered or products sold to the Company) between the Company and CSD.

Answer: The Company sent empty 55 gallon steel drums (primarily open headed) to CSD for reconditioning. It also sent empty 55 gallon fibre drums to CSD for disposal. Occasionally, other empty containers made of plastic were sent to CSD for disposal. The Company purchased reconditioned 55 gallon steel drums (primarily open headed)

from CSD.

4.c. Provide copies of any contracts or agreements between the Company and CSD.

Answer: There were no written contracts or agreements.

5.a. For each facility identified in Question 4, state the nature of the operations conducted at the facility, including the time period in which the facility operated.

Answer: See answer to question #3. Valley Forge plant in operation during entire 1980-1994 period.

5.b. State the name, address, and current RCRA Identification Number of each facility.

Answer: American Inks and Coatings Corp., 330 Pawlings Road, Phoenixville, PA, 19460; mailing address-P.O. Box 803, Valley Forge, PA, 19482; I.D.#PAD002353290.

6. For each transaction between the Company and CSD, provide the following information:

a. Identify the specific dates of each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year.

b. Identify the number of Containers that were the subject of each such transaction.

c. Generically describe each Container that was the subject of each such transaction (example: closed-head steel drums, etc.).

d. Identify the intended purpose of each such transaction.

Answer 6.a, b, c and d: See attached Schedule A, "Drums Sent to CSD" for each shipment of empty drums to CSD for reconditioning or disposal which identifies each such transaction from 12/27/89 to 10/18/93. See attached Schedule B "Reconditioned Drums Purchased From CSD" which identifies each purchase of drums from CSD from 12/27/89 to 12/14/93. The Company has no records prior to 12/27/89, as it maintains such records for a period of seven years; therefore, it has no records prior to 12/27/89. The Company did business with CSD prior to that date but cannot identify

any individual transactions.

6.e. State whether each Container that was the subject of the transaction contained any substance at the time of the transaction. As to each Container that contained any substance:

(1) Identify each such substance, including its specific chemical constituent, physical state, quantity by volume and weight, and other characteristics; and

(2) Provide all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

Answer-6e: All drums sent to CSD for reconditioning or disposal are believed to be empty to the extent that "empty" is defined by federal regulations, see 40 CFR §261.7.

(1) To the extent that residues remained in the drums, those residues could be any of the Company's products (i.e. graveure printing inks), raw materials (including resins, solvents, alcohol and water), pigments, or mixed cleaning solvents (described in 40 CFR §261.32 as "ink formulation" classified as K086). These are all residues of these substances and there is no way to determine the volume, weight or chemical constitutents of these residues, because the empty drums sent for reconditioning or disposal could have been used for any of a variety of purposes.

(2) See answer to question #6(e)(1). No material safety data sheets required on empty drums.

7. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.

Answer: See document packet included.

8. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.

Answer: Donald Kucharik
Purchase Manager
P. O. Box 803
Valley Forge, PA 19482
610-272-8866

9. If you contend that any such Container did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance.

Answer: Yes.

9.a. Identify all substances previously contained within such Container, including its specific chemical constitutent, physical state, and other characteristics.

Answer: See response to question #6(e)(1).

9.b. Provide as to such substances, all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

Answer: See response to question #6(e)(2).

10. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.

Answer: The Company did not treat the empty drums prior to shipment to CSD. Many of the drums were empty drums returned from customers after use. The Company has no knowledge of any treatments performed on the empty drums by its customers.

11. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

Answer: The Company believes all drums were transported to and from CSD on CSD trucks.

12. Identify each person consulted in responding to these questions and correlate each person to the question

on which he or she was consulted.

Answer: Donald Kucharik and William P. Rimel, III.

13. Identify any other person (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title and a description of their responsibilities.

Answer: Employees of CSD - only name known is Jeffrey Skuraton.

14. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

Answer: No knowledge.

EXPLANATION OF SCHEDULES ATTACHED TO RESPONSES
OF AMERICAN INKS AND COATINGS CORP.
TO REQUEST FOR INFORMATION QUESTION #6

Schedule A is a listing of transactions where American Inks sent drums to CSD for reconditioning or disposal. Each transaction produced two documents, each bearing the same date. The first document is the American Inks and Coatings Bill of Lading ("AIC B/L#"). Schedule A sets out the bill of lading number, together with the description of the drums and total which appears on the bill of lading. These descriptions usually only distinguish between open headed, closed head and fibre drums. The second document is the Central Steel Drum Credit Memorandum ("CSD Credit Memo"). Schedule A sets out the credit memorandum number, the description of the drums received and the dollar amount of the credit ("$Credit Amount"). The description of the drums received by CSD on the memorandum is reproduced on Schedule A from the memorandum and is more technical than the description on the AIC B/L. The dollar amount of the credit was determined by the different credits given by CSD to American Inks depending on the type of drum. Open headed 17H drums generally received a credit of $6.50 per drum, while closed head drums such as 20/18 BT Cuts received a $1.00 credit. Scrap and fibre drums received no credit. The total number of drums on the AIC B/L and the CSD credit memo are the same although the description of the individual drums varies. All drums sent to CSD for reconditioning or disposal were empty.

Schedule B is a listing of transactions where American Inks purchased reconditioned drums from CSD. Each transaction created three documents, all of which have the same date. First is the Central Steel Drum bill of lading ("CSD B/L"). Schedule B sets out the bill of lading number, together with the total number of drums sent to American Inks and the number of drums rejected by American Inks as unsatisfactory. In the packet of documents, there are usually two copies of the same bill of lading - copy 2 and 3 of the multipart set. The second document is the American Inks receiving record ("AIC RR#"). Schedule B lists the RR number and the total number of drums received. The third document is the Central Steel Drum invoice ("CSD INV#"). Schedule B lists the invoice number and the total dollar amount of the invoice. All drums purchased from CSD were empty open headed drums. Occasionally, American Inks purchased rings, heads and bungs from CSD. These purchases are not listed on Schedule B although they are included in the documents produced.

SCHEDULE A

DRUMS SENT TO CSD

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
12/27/89	1437	125 17H 25 closed head 34 55-gal. OH Total-184	5189	65 17H S.S. 46 17H BB/Rieke 29 20/18 STC 30 20/18 BT Cuts 14 Scrap	$ 780.50
01/22/90	2567	35 OH 32 BT 69 17H Total-136	5322	69 17H S.S. 35 20/18 STC 32 20/18 BT Cuts	515.50
02/12/90	1503	33 Closed Head empty drs. returned 124 Open Head empty drs. returned Total-157	5558	78 17H S.S. 39 20/18 STC 33 20/18 BT Cuts 7 Scrap	579.00
03/09/90	1811	182 mixed drums	5754	58 17H BB/Rieke 15 20/18 Orig. 33 20/18 STC 64 20/18 BT Cuts 12 Scrap	489.00
03/22/90	1903	22 Closed Head Drums 62 O/H Drums Total-84	5831	4 17H S.S. 41 17H BB/Rieke 9 20/18 STC 22 20/18 BT Cuts 8 Scrap	323.50
04/19/90	1887	96 Fibres Drum 116 Steel Drums Total-212	6024	2 17H S.S. 43 17H BB/Rieke 23 20/18 Orig. 40 20/18 BT Cuts 8 Scrap 96 Fibres	355.50

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
05/30/90	1977	56 OH	6344	32 17H BB/Rieke 12 20/18 STC 8 20/18 BT Cuts 4 Scrap	228.00
05/11/90	1999	203 empty drums	6426	8 17H S.S. 107 17H BB/Rieke 28 20/18 STC 54 20/18 BT Cuts 6 Scrap	829.50
05/17/90	2600	31 17H OH 8 closed heads 4 OH Total-43	6472	24 17H BB/Rieke 4 20/18 STC 3 20/18 BT Cuts 10 Scrap 2 Returned	163.00
06/04/90	1644	90 OH 23 Closed Heads Total-113	6170	20 17H S.S. 36 17H BB/Rieke 21 20/18 STC 22 20/18 BT Cuts 14 Scrap	407.00
06/13/90	1668	24 17H 7 OH 27 BT 14 Drums returned subject to inspection Total-72	6563	21 17H BB/Rieke 22 20/18 BT Cuts 8 Scrap 14 Rejects	158.50 253.40
07/17/90	1763	73 empty drums being returned for credit	6751	8 17H S.S. 40 17H BB/Rieke 8 20/18 STC 8 20/18 BT Cuts 9 Scrap	328.00

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
07/24/90	1781	Empty Drums: 53 BT 15 CH 65 17H Total-133	6802	62 17H BB/Rieke 13 20/18 STC 53 20/18 BT Cuts 5 Scrap	469.00
08/02/90	2006	58 Fibre Drums 35 M.T. drums Total-93	6870	20 17H BB/Rieke 7 20/18 STC 3 20/18 BT Cuts 5 Scrap 58 Fibers	140.00
08/28/90	2150	151 empty drums	7347	55 17H S.S. 27 20/18 STC 47 20/18 BT Cuts 2 Scrap 20 Rejects	431.50
09/05/90	2057	37 empty Fibre drums			
09/12/90	2083	82 17H OH 40 closed heads 6 OH 55 gals. Total-128	7433	27 17H S.S. 51 17H BB/Rieke 6 20/18 STC 38 20/18 BT Cuts 6 Scrap	551.00
09/25/90	4105	124 empty drums	7536	30 17H S.S. 38 17H BB/Rieke 2 20/18 STC 43 20/18 BT Cuts 11 Scrap	487.00
10/04/90	4135	40 17H 7 OH 7 CH 16 Fibre 6 Acid Paks 4 Plastics Total-80	7615	39 17H S.S. 7 20/18 STC 7 20/18 BT Cuts 1 Scrap 16 Fibre 10 Plastic-Acid Pak	167.50

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
10/16/90	4168	54 17H OH 30 Bung Type Total-84	7681	12 17H S.S. 39 17H BB/Rieke 6 20/18 STC 13 20/18 BT Cuts 12 Scrap 2 Plastic	330.50
11/01/90	2185	21 Bung Type 2 30 gal. OH 3 Rule 40 65 17H OH Total-91	7799	15 17H S.S. 48 17H BB/Rieke 3 20/18 STC 2 30 gal. O.H. 21 20/18 BT Cuts 2 Scrap	435.50
11/13/90	3913	102 metal drums 77 Fibre drums Total-179	7871	11 17H S.S. 50 17H BB/Rieke 4 20/18 STC 20 20/18 BT Cuts 9 Scrap 85 Fibres	420.50
12/19/90	3844	239 empty drums being returned for credit	8748	41 17H S.S. 106 17H BB/Rieke 6 20/18 Orig. 69 20/18 BT Cuts 17 Scrap	1,030.50
02/05/91	3463	134 17H 38 BT 22 OH Total-194	8979	10 17H S.S. 117 17H BB/Rieke 36 20/18 BT Cuts 11 Scrap	881.50
03/14/91	3536	144 drums to be recon. 23 fibre drums Total-167	8401	20 17H S.S. 63 17H BB/Rieke 16 20/18 STC 38 20/18 BT Cuts 7 Scrap 23 Fibre	593.50

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
04/01/91	3590	63 drums being returned for credit	00003	30 17H S.S. 11 20/18 STC 19 20/18 BT Cuts 3 Scrap	225.00
04/29/91	3008	84 17H OH 13 17E OH 20 closed heads 104 JUNK BASE DRS 14 W.S. drums Total-235	8516	10 17H S.S. 63 17H BB/Rieke 10 20/18 STC 20 20/18 BT Cuts 104 Scrap (Base Drums) 14 Non-CSD Leaker 14 Scrap	504.50
06/03/91	3110	38 17H drs. 46 closed head 11 17H leakers & rejects 10 OH drs. Total-105	00400	35 17H BB/Rieke 10 20/18 STC 44 20/18 BT Cuts 11 rejects	281.50
07/11/91	3174	123 return drums for recond. 55 fibre drums Total-178	00607	15 17H S.S. 46 17H BB/Rieke 8 20/18 orig. 47 20/18 BT Cuts 7 Scrap 55 Fibres	451.50
07/16/91	3191	40 empty fibre drums 23 steel Total-63	00627	4 17H S.S. 4 20/18 STC 15 20/18 BT Cuts 40 Fibers	45.00
08/21/91	3694	84 55 gp/OH	00828	42 17H BB/Rieke 30 20/18 STC 10 20/18 BT Cuts 2 Scrap	313.00

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
09/09/91	4017	50 Fibre 38 17H OH 5 Rule 40 25 BT Total-118	00919	38 17H S.S. 5 20/18 STC 25 20/18 BT Cuts 50 Fibers	277.00
10/07/91	4085	117 empty drums to be recon.	01075	29 17H S.S. 28 17H BB/Rieke 11 20/18 STC 49 20/18 BT Cuts	430.50
11/12/91	3773	31 Fibre Drums 82 17H OH Total-113	01285	18 20/18 BT Cuts 31 Fibers 6 Scrap 9 20/18 orig. 49 17H BB/Rieke	345.50
10/24/91	3795	46 17H OH 27 Fibre Drums Total-73	01196	27 Fibers 28 17H S.S. 18 20/18 BT Cuts	200.00
01/09/92	3238	119 55 gal. drums returned 42 Fiber drums returned Total-161	01539	80 17H BB/Rieke 2 17H S.S. 37 20/18 BT Cuts 42 Fibers	570.00
03/05/92	4835	149 OH drums 2 leakers Total-151	01841	2 rejects 36 20/18 BT Cuts 11 20/18 STC 4 Scrap 8 17H S.S. 90 17H BB/Rieke	684.00
04/27/92	4931	77 empty fibre drums 110 OH 49 closed heads Total-236	02121	77 fibres 23 20/18 STC 45 20/18 BT Cuts 10 Scrap 6 17H S.S. 75 17H BB/Rieke	594.50

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
05/18/92	4456	156 metal drums 49 fibre drums Total-205	02248	49 fibers 9 Scrap 47 20/18 BT Cuts 14 20/18 STC 86 17H BB/Rieke	620.00
07/16/92	4611	175 empty drums returned 70 empty fiber drums returned Total-245	02618	75 fibers 83 20/18 BT Cuts 7 20/18 STC 16 Scrap 21 17H S.S. 48 17H BB/Rieke	538.50
08/24/92	4662	58 Steel Drs ret'd (empty) 17H 18 Steel Drs ret'd (empty) BT 8 O/H Drs ret'd (empty) 69 Fiber Drs ret'd (empty) Total-153	02849	69 fibers 18 20/18 BT Cuts 8 20/18 STC 56 17H BB/Rieke 2 Scrap	390.00
08/13/92	4756	53 fibre drums 135 metal drums Total-188	02780	53 fibers 52 20/18 BT Cuts 14 20/18 orig. 60 17H BB/Rieke 9 Scrap	456.00
09/16/92	4252	102 M.T. drum subject to Count 60 fibre drums Total-162	02989	60 fibers 47 20/18 BT Cuts 6 Scrap 49 17H BB/Rieke	365.50
10/06/92	4793	98 17H drum 35 Bung Type 55 OH 4 Total-188	03108	20 17H S.S. 75 17H BB/Rieke 3 Scrap 35 20/18 BT Cuts 55 20/18 orig.	707.50

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
11/19/92	4640	88 MT OH 32 Closed Head Total-120	03386	12 20/18 orig. 5 Scrap 35 17H S.S. 36 17H BB/Rieke 32 20/18 BT Cuts	505.50
12/10/92	4356	9 Closed Heads 37 Open Heads 41 Fibers Total-87	03446	41 Fibers 12 20/18 BT Cuts 3 Scrap 2 20/18 STC 29 17H BB/Rieke	202.50
11/30/92	2984	197 steel drums 29 Fibre drums Total-226	03458	29 Fibers 57 20/18 BT Cuts 7 Scrap 12 20/18 STC 17 17H S.S. 104 17H BB/Rieke	855.50
01/21/93	5404	124 return emptys	0000000020	15 17H SS 55 gal. 50 17H 55 gal. BB/Rieke 8 20/18 GA 55 gal. STC 39 20/18 55 gal. BT Cuts 12 Scrap	469.50
01/28/93	5417	64 Fiber Drums 15-55 gal. Steel Drums Total-79	0000000082	7 17H 55 gal. BB/Rieke 8 20/18 55 gal. BT Cuts 64 Fibre	53.50
02/17/93	00036	71 Sealed Drums 32 Fiber Drums Total-103	0000000182	38 20/18 55 gal. BT Cuts 32 Fibre 30 17H 55 gal. BB/Rieke 33 Scrap	233.00

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
03/22/93	00144	120 steel drums returned 51 Fiber drums returned Total-171	00369	10 17H SS 55 gal. 16 20/18GA 55 gal. STC 57 17H 55 gal. BB/Rieke 35 20/18 55 gal. BT Cuts 2 Scrap 51 Fibre	486.50
04/07/93	5501	101 closed head drums returned; 5 open head drums returned Total-106	00497	5 17H SS 55 gal. 97 20/18 55 gal. BT Cuts 4 Scrap	129.50
05/06/93	00298	105 empty fiber Dr's 150 empty open head dr's 17 empty closed head dr's Total-272	00661	105 Fibre 38 20/18GA 55 gal. STC 106 17H 55 gal. BB/Rieke 17 20/18 55 gal. BT Cuts 6 Scrap	744.00
06/08/93	00413	61 Fiber drums 55 Open head drums 56 Closed head drums 15 leakers Total-187	00852	64 Fibre 42 17H 55 gal. BB/Rieke 15 rejects 17H 8 20/18GA 55 gal. STC 58 20/18 55 gal. BT Cuts	339.00
06/15/93	00446	60 55 gal.-open head drums (empty) 43 55 gal.-closed head drums (empty) Total-103	00881	53 17H 55 gal. BB/Rieke 5 20/18GA 55 gal. STC 45 20/18 55 gal. BT Cuts	394.50
08/09/93	00627	244 empty steel drums 48 empty fiber drums Total-292	01195	48 Fibre 75 20/18 55 gal. BT Cuts 31 20/18GA 55 gal. orig. 6 Scrap 132 17H 55 gal. BB/Rieke	964.00
09/20/93	00762	204 empty steel drums 48 empty fiber drums Total-252	01432	48 Fibre 204 17H SS 55 gal.	1,326.00

DATE	AIC B/L#	DESCRIPTION	CSD CREDIT MEMO #	DESCRIPTION	$CREDIT AMOUNT
11/16/93	00970	93 empty open-head steel drums 30 empty closed-head steel drums 83 empty fiber drums Total-206	003905	93 17H SS 55 gal.	604.50
10/18/93	00864	229 Steel drums (empty) 51 fiber drums (empty) Total-280	003927	179 17H SS 55 gal. 50 20/18 55 gal. BT Cuts 50 fibre	1,213.50

SCHEDULE B

RECONDITIONED DRUMS PURCHASED FROM CSD

DATE	CSD B/L #	DRUMS SENT/REJECTED	AIC RR #	DRUMS RECEIVED	CSD INV #	AMOUNT
12/27/89	003439	286/0	10348	286	60289	6,874.00
01/02/90	003487	276/0	10429	276	60412	6,634.00
01/22/90	005094	276/0	10499	276	60496	6,634.00
01/29/90	005154	250/0	10550	250	60560	6,010.00
02/12/90	005237	270/8	10607	262	60710	6,298.00
02/14/90	005244	276/0	10624	276	60737	6,634.00
03/09/90	005636	262/8	10753	254	60975	6,106.00
03/22/90	005720	275/0	10812	275	61084	6,610.00
04/05/90	008126	276/0	10910	276	61216	6,634.00
04/19/90	005438	276/0	10979	276	61351	6,634.00
05/03/90	008275	230/0	11052	230	61486	5,530.00
05/11/90	008394	239/25	11215	214	61581	5,146.00
05/17/90	008358	276/12	11244	264	61638	6,346.00
06/04/90	009882	250/4	11112	246	61806	5,914.00
06/13/90	009946	261/4	11168	257	61908	6,178.00
06/22/90	005751	276/0	11195	276	61999	6,634.00
07/17/90	005915	257/3	11359	254	62227	6,106.00
07/24/90	008807	232/7	11387	225	62292	5,410.00
08/02/90	008546	226/14	11425	212	62429	5,098.00
08/09/90	008597	274/14	11461	260	62541	6,250.00
08/28/90	009503	261/23	11570	238	62743	5,722.00
09/04/90	009741	260/0	11604	260	62869	6,250.00
09/12/90	009412	246/3	11639	243	62973	5,842.00
09/20/90	009007	257/16	11684	241	63074	5,794.00
09/25/90	009061	251/10	11699	241	63134	5,794.00
10/04/90	009168	281/8	11753	273	63254	6,562.00
10/16/90	006020	253/3	11814	250	10733	6,216.05
10/23/90	006082	264/0	11854	264	10794	6,526.08
11/01/90	006156	278/23	11906	255	10918	6,303.60
11/07/90	006199	231/0	11932	231	10997	5,710.32
11/13/90	006258	281/17	11953	264	11104	6,526.08
11/26/90	006350	249/0	12015	249	11216	6,155.28
11/29/90	006390	251/224	12037	27	11268	648.00
12/19/90	006631	276/14	12103	262	11465	6,476.64
01/03/91	006682	187/12	12135	175	11446	4,326.00
01/18/91	006822	259/58	12211	201	11606	4,968.72
02/05/91	006986	256/4	12276	252	11785	6,229.44
02/21/91	008156	144/0	12354	144	11951	3,559.68

DATE	CSD B/L #	DRUMS SENT/REJECTED	AIC RR #	DRUMS RECEIVED	CSD INV #	AMOUNT
03/14/91	008381	261/13	12455	248	12201	5,712.38
03/21/91	008453	271/0	12480	271	12276	5,672.73
04/01/91	008544	261/7	12522	254	12374	5,835.47
04/29/91	008848	240/0	12652	240	12710	5,543.46
05/10/91	008985	245/11	12705	234	12875	4,797.00
05/20/91	011090	269/4	12762	265	12999	5,618.00
06/03/91	011312	204/11	12812	193	13147	4,632.00
06/11/91	011394	242/0	12835	242	13228	4,961.00
06/17/91	011463	236/5	12866	231	13308	4,748.50
06/20/91	011508	138/10	12878	128	13365	3,072.00
07/11/91	011523	247/0	12983	247	13571	5,063.50
07/16/91	011559	248/0	13015	248	13603	5,532.00
07/30/91	011688	248/1	13086	247	13760	5,490.50
08/20/91	011941	250/0	13205	250	14023	5,160.00
08/29/91	007270	218/4	13250	214	14109	4,387.00
09/09/91	007360	241/5	13304	236	14186	4,838.00
09/18/91	007462	254/7	13344	247	14296	5,063.50
10/07/91	007884	200/17	13448	183	14508	3,751.50
10/24/91	007550	233/3	13561	230	14690	5,180.50
10/31/91	007614	163/0	13599	163	14762	3,341.50
11/12/91	007727	263/15	13662	248	14863	5,084.00
12/02/91	007093	233/0	13723	232	15046	4,776.50
01/08/92	013114	255/6	13901	249	15329	5,104.50
01/14/92	013157	276/0	13921	276	15399	6,137.50
02/06/92	013341	213/0	14048	213	15658	4,366.50
02/28/92	007116	276/0	14190	276	15869	6,169.00
03/05/92	013611	229/0	14218	229	15947	5,114.50
03/23/92	013544	221/0	14331	221	16101	4,866.50
04/07/92	013897	230/0	14433	230	16269	4,977.50
04/09/92	013935	251/0	14456	251	16309	5,317.00
04/27/92	012073	188/5	14543	183	16453	3,751.50
05/11/92	012222	277/0	14616	277	16612	6,019.00
05/18/92	012291	279/5	14666	274	16691	6,209.50
06/04/92	012438	258/2	14743	256	16885	5,248.00
06/09/92	012476	268/3	14777	265	16941	5,891.00
06/15/92	012776	248/13	14815	235	16995	4,817.50
07/02/92	012950	220/0	14935	220	17184	4,510.00
07/16/92	012600	241/7	14998	234	17330	5,227.50

DATE	CSD B/L #	DRUMS SENT/REJECTED	AIC RR #	DRUMS RECEIVED	CSD INV #	AMOUNT
07/23/92	012664	276/0	15046	276	17406	5,658.00
08/06/92	015299	213/0	15121	213	17577	4,366.50
08/13/92	015373	237/0	15156	237	17657	4,858.50
08/24/92	015438	261/7	15216	254	17740	5,207.00
09/16/92	015154	253/1	15355	252	000191	5,621.00
09/23/92	015234	262/0	15395	262	000293	5,371.00
10/06/92	015460	259/3	15455	256	000405	5,465.00
10/19/92	015887	242/0	15517	242	000496	4,961.00
10/22/92	015950	275/0	15548	275	000559	6,120.50
11/05/92	015625	229/2	15616	227	000698	4,653.50
11/19/92	014006	276/9	15679	267	000840	5,473.50
11/30/92	014074	264/16	15714	248	000916	5,084.00
12/10/92	014017	261/5	15752	256	001009	5,706.50
01/11/93	014327	264/4	15860	260	001248	5,578.50
01/21/93	014416	218/6	15913	212	001349	4,346.00
01/27/93	014469	255/7	15937	248	001409	5,477.50
02/04/93	014553	276/0	15968	276	001508	5,658.00
02/10/93	014590	261/9	16000	252	001563	5,617.50
02/17/93	014633	233/2	16629	231	001625	4,735.50
03/09/93	014788	281/18	16741	263	001834	5,817.10
03/16/93	014834	263/3	16770	260	001901	5,330.00
03/22/93	014878	276/2	16417	274	001968	5,928.50
03/30/93	014947	273/0	16483	273	002054	6,079.50
04/07/93	017013	252/0	16528	252	002164	5,624.50
04/21/93	017391	254/0	16592	254	002294	5,207.00
05/06/93	017044	259/3	16850	259	002453	5,309.50
05/12/93	017061	232/0	16882	232	002513	5,057.00
06/15/93	017632	265/5	17065	260	002869	5,802.50
07/08/93	017808	275/0	17173	275	003105	6,131.00
07/15/93	017868	262/0	17216	262	003182	5,371.00
06/08/93	017567	250/15	17030	235	003204	4,817.50
07/29/93	017987	273/3	17297	270	003315	5,535.00
08/09/93	018391	276/0	17362	276	003412	5,658.00
09/20/93	018973	261/0	17546	261	003784	5,823.00
09/23/93	018514	267/3	17573	264	003816	5,412.00
10/18/93	018671	153/0	17685	153	004035	3,420.00
11/02/93	018029	275/0	17759	275	004164	5,637.50
11/16/93	018079	261/0	17842	261	004282	5,350.50
12/14/93	009532	276/0	17965	276	004479	5,658.00

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Pennsylvania

County of Chester

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.

DONALD KUCHARIK
NAME (print or type)

PURCHASING MANAGER
TITLE (print or type)

Donald Kucharik
SIGNATURE

Sworn to me before this
12th day of January, 1998

Mary Jane Wagner
Notary Public

NOTARIAL SEAL
MARY JANE WAGNER, Notary Public
Schuylkill Twp., Chester County
My Commission Expires June 22, 2000

THIS SHIPPING ORDER must be legibly filled, in ink, in indelible Pencil, or in Carbon, and retained by the Agent

Shipper's No. 006156

(Name of Carrier)
RECEIVE, subject to the classifications and tariffs in effect on the date of issue of this Shipping Order,

Carrier's No. ______

At **704 Doremus Ave., Newark, NJ 07105** **(201) 344-8500** 11/1 19 90

From **CENTRAL STEEL DRUM COMPANY**

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address of consignee - For purposes of notification only.)

Consigned to ~~AMERICAN INK & COATINGS~~

Destination ~~P.O. BOX 833~~ State ______ Zip Code ______ Delivery Address ★ ______

(★ To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route ~~VALLEY FORGE, PA 19402~~

Delivering Carrier A4941 Car or Vehicle Initials [illegible] No. [illegible]

NO. PACKAGES	HAZARDOUS MATERIALS	Kind of Package, Description of Articles, Special Marks, and Exceptions	WEIGHT (SUBJECT TO CORR.)	CLASS OR RATE	CHECK COLUMN
278	55 GAL	NEW 17H 18-18 C 260 17H ASS [illegible]			
		BLACK			
-23		REJECTED			
255					
TOTAL PIECES					

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Per ______ (Signature of Consignor.)

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received $ ______ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier.

Per ______ (The signature here acknowledges only the amounts prepaid.)

Charges Advanced:

$ ______

SHIPPERS CERTIFICATION This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SIGNATURE: [signature] TITLE: ______

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

per ______

✝ Shipper's imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission.

CENTRAL STEEL DRUM COMPANY
704 Doremus Ave.
NEWARK, NJ 07105

Shipper, Per ______

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

Permanent post office address of shipper

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Item # F3 Grayarc, P.O. Box 2944, Hartford, CT 06104-2944
© Wheeler Group, Inc., 1982

THIS MEMORANDUM is an acknowledgement that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. 009007

(Name of Carrier)

RECEIVED, subject to the classification and tariffs in effect on the date of receipt by the carrier of the property described in the Original Bill of Lading,

Carrier's No. 30

At 704 Doremus Ave., Newark, NJ 07105 (201) 344-8500 ________, 19__

From CENTRAL STEEL DRUM COMPANY

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier be understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the d hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipme and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address of consignee - For purposes of notification on

Consigned to ~~AMERICAN INK & COATINGS~~

Destination ~~P.O. BOX 803~~ State ______ County ______ Delivery Address ★

Route VALLEY FORGE, PA 19402

(★ To be filled in only when shipper desires and governing tariffs provide for delivery therea

Delivering Carrier P.O. A4748 Car or Vehicle Initials B-D(?) No. [illegible]

NO. PACKAGES	HAZARDOUS MATERIALS	Kind of Package, Description of Articles, Special Marks, and Exceptions	*WEIGHT (SUBJECT TO CORR.)	CLASS OR RATE	CHECK COLUMN
[illegible]	[illegible]	[illegible]			
		[illegible]			
-16		Leaking Heads			
241					
TOTAL PIECES					

Subject to Section 7 of con tions of applicable bill of lading, this shipment is to be delivered the consignee without recourse the consignor, the consignor sl sign the following statement: The carrier shall not make deliv of this shipment without paym of freight and all other law charges.

Per ______ (Signature of Consignor.)

If charges are to be prepaid, writ or stamp here, "To be Prepaid."

Received $ ______ to apply in prepayment of t charges on the property describ hereon.

Agent or Cashier.

Per ______ (The signature here acknowledge only the amounts prepaid.)

Charges Advanced: $ ______

SHIPPERS CERTIFICATION This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SIGNATURE: [signature] TITLE:

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding ______ per ______

† Shipper's imprint in lieu of sta not a part of Bill of Lading appro by the Interstate Commerce Co mission.

CENTRAL STEEL DRUM COMPANY
704 Doremus Ave.
NEWARK, NJ 07105

Shipper, Per ______ ______ Agent, Per ______

Permanent post office address of shipper

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American National Can

PECHINEY GROUP

December 30, 1997

Ms. Suzanne Becker
Removal Action Branch
Emergnecy & Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, NJ 08837

RE: Central Steel Drum Superfund Site
Newark, New Jersey

Dear Ms. Becker:

I am writing to advise you that American National Can Company is still in the process of assembling materials in order to respond to the CERCLA Section 104(e) request for information on the above Site. American National Can Company is requesting a 30 day extension past the original deadline of January 10, 1998, to allow time for a thorough investigation and a complete response to the information request.

If there are any problems with this request, please call me at (773) 399-3642.

Very truly yours,

Tim Guerra, Esq.

cc: E. Burns Lerum

American National Can

PECHINEY GROUP

January 20, 1998

Suzanne Becker
Removal Action Branch
Emergency and Remedial Response Division
U. S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, NJ 08837

RE: Central Steel Drum Superfund Site in Newark, New Jersey

Dear Ms. Becker:

This letter is submitted by American National Can Company ("ANCC") in response to the request by the U.S. Environmental Protection Agency ("U.S. EPA") under the authority of Section 104 of CERCLA, for information concerning the above-referenced site.

The following response is based upon the present knowledge, information, and belief of ANCC, as derived from the knowledge of present or retired employees gained in their capacity as such, and from a diligent search of available records of ANCC that would likely contain the information sought by the U.S. EPA In replying to the request for information, ANCC shall not be deemed to have admitted any liability or responsibility with respect to the Central Steel Drum Superfund Site. ANCC expressly denies any such liability and responsibility and reserves any and all defenses as may exist at law or in equity. Additionally, ANCC reserves the right to modify, supplement or amend these responses should additional or different information be found concerning the subject matter of the request for information. Notwithstanding this response or a modification, supplement, or amendment hereto, none of the information contained in this response should be deemed an admission of fact, and ANCC reserves the right to object to the introduction of any information contained herein in any administrative or judicial proceeding.

ANCC requests that neither the U.S. EPA, nor any of its employees or consultants contact any employee or retiree of ANCC without first contacting the undersigned.

ANCC has made diligent efforts to comply with the Information Request and to provide complete and comprehensive answers to the questions forwarded by the U.S. EPA To reserve its rights, however, ANCC objects to the Information Request on the basis that various portions of it are unduly burdensome, overbroad, vague, unreasonable, and request information that has no relevance to the site at issue. ANCC reserves its right to challenge the lawfulness of this

Information Request including the Information Request Definitions and Instructions and to assert any legal defenses that may be available to it. In addition, ANCC specifically reserves its right to challenge U.S. EPA's authority and legal basis to request this information relating to ANCC.

Subject to the foregoing, ANCC answers as follows:

Request # 1.

a. State the correct legal name of the Company
b. Identify the legal status of the Company (corporation, partnership, sole proprietorship, specify if other) and the state in which the Company was organized.
c. State the names(s) and address(es) of the officers of the Company.
d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the names(s) and address(es) of the officers of those organizations. Provide such information for any further parent/subsidiary relationships.
e. If the company is a successor to, or has been succeeded by, another company, identify such other company and provide the same information requested above for the predecessor or successor company.
f. If the Company transacted business with Central Steel Drum in the name of an entity not disclosed above, give the name of such entity and state its relationship to the Company.

Response to Request #1

a. American National Can Company
b. ANCC is a Corporation incorporated in the State of Delaware.
c. ANCC objects to Information request No. 2 on the grounds that it is overbroad and unduly burdensome. Without waiving these objections, see response to Request 1(e).
d. ANCC objects to Information request No. 2 on the grounds that it is overbroad and unduly burdensome. Without waiving these objections, see response to Request 1(e).
e. ANCC objects to Information request No. 2 on the grounds that it is overbroad and unduly burdensome. Without waiving these objections, the following transactions were completed to form ANCC: on May 1, 1985,

Triangle Acquisition Corporation (TAC), a wholly-owned subsidiary of Triangle Industries, Inc. (TII) purchased and owned approximately 94% of the outstanding shares of National Can Corporation ("NCC"). A merger of TAC and NCC was completed on June 28, 1985 with NCC being the surviving corporation. On April 30, 1987, American Can Packaging Inc., (the packaging assets of American Can Company and a wholly-owned subsidiary of TII) and Trafalgar Industries, Inc. (a wholly-owned subsidiary of TII) merged with and into NCC. Upon the effective date of the Merger, NCC changed its name to American National Can Company (ANCC). In January 1989, Pechiney Corporation purchased the stock of TII, which included ANCC.

f. **Not applicable.**

Request # 2.

Describe in detail the nature of your Company during the years 1980-1994. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.

Response to Request #2

ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e), unduly burdensome and not relevant to the site to describe the Company's various business. ANCC further objects to Information request No. 2 on the grounds unduly burdensome and vague as to the term "nature." Without waiving these objections, ANCC states its Washington, NJ plant from 1980-1994 manufactured single-layer plastic tubes and closures, and high-barrier laminate tubes composed of plastic, metal foil or, in some cases, paper. These laminate tubes were manufactured by converting purchased webstock into a tube through an injection molding process. Closures were manufactured by an injection molding process. Plastic tubes were formed by an extruder and an injection molding process. In addition, from 1980 - 1988 the Washington, NJ plant manufactured aerosol two piece cans. This operation included a coating and printing operation. Further answering, see response to Request 1(e).

Request # 3.

Briefly describe your Company's operations. Also, identify any chemical substances used to clean equipment or machinery.

Response to Request #3

ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e), unduly burdensome and vague as to the phrase "describe your Company's operation." Without waiving these objections, see response to Request #2. Further answering, chemical substances used to clean equipment or machinery were small amounts of trichloroethylene and mop water.

Request # 4.

a. State whether the Company or any Company facility transacted any business with CSD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers")
b. If so, describe the relationship (nature of services rendered or products sold to the Company) between the Company and CSD;
c. provide copies of any contracts or agreements between the Company and CSD;

Response to Request #4

a. Yes
b. ANCC Washington, NJ plant transacted business with CDS for the disposal of empty drums and the purchase of empty drums.
c. See attached exhibit #1.

Request # 5.

a. For each facility identified in Request 4, state the nature of the operations conducted at the facility including the time period in which the facility operated,
b. State the name, address, and current RCRA Identification number of each facility;

Response to Request #5

a. **ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e), unduly burdensome and vague as to the phrase "nature of the operations." Without waiving these objections, see response to Request #2.**

b. **American National Can Company**
Route 31, North
Washington, NJ 07882
RCRA ID: NJD002397834

Request # 6.

For each transaction between the Company and CSD, provide the following information:

a. Identify the specific dates of each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year;
b. Identify the number of Containers that were the subject of each such transaction;
c. Generically describe each Container that was the subject of each such transaction (example: closed-head steel drums, etc.);
d. Identify the intended purpose of each such transaction;
e. State whether each Container that was the subject of the transaction contained any substance at the time of the transaction. As to each Container that contained any substance:
   (1) Identify each such substance, including its specific chemical constituent; physical state, quantity by volume and weight, and other characteristics; and
   (2) Provide all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

Response to Request #6

Document no. 001

a. **5/22/89.**
b. **81 empty steel drums and 37 empty poly lined drums.**
c. **See answer to Request 6b.**
d. **ANCC objects to this request on the grounds that it is beyond the scope of**

EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 001. Further answering, these drums were hauled and disposed of by Central Steel Drum.

e. The drums shipped to Central Steel Drum contained very small quantities of residue and in all case would be considered RCRA empty under 40 CFR Section 261.7. It is unknown what, if any, substances were present in the drums shipped to Central Steel Drum.

Document 002

a. 6/8/90.

b. 82 empty steel drums and 32 plastic lined drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 002. Further answering, these drums were shredded and recycled by Central Steel Drum.

e. The drums shipped to Central Steel Drum contained very small quantities of residue and in all case would be considered RCRA empty under 40 CFR Section 261.7. It is unknown what, if any, substances were present in the drums shipped to Central Steel Drum.

Document 003

a. 7/21/89.

b. 6 empty open head steel drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 003. Further answering, ANCC purchased 6 reconditioned steel drums from Central Steel Drum.

e. No.

Document 004

a. 5/17/89.

b. 250 empty steel drums and 80 plastic lined drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 004. Further answering, these drums were hauled and disposed of by Central Steel Drum.

e. The drums shipped to Central Steel Drum contained very small quantities of residue and in all case would be considered RCRA empty under 40 CFR Section 261.7. It is unknown what, if any, substances were present in the drums shipped to Central Steel Drum.

Document 005

a. 7/5/90.

b. 7 empty steel drums and 2 eighty-five-gallon plastic overpacks.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 005. Further answering, ANCC purchased 7 reconditioned steel drums and 2 eighty-five-gallon plastic overpacks from Central Steel Drum.

e. No.

Document 006

a. 11/17/89.

b. 8 empty open head steel drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 006. Further answering, ANCC purchased 8 reconditioned steel drums from Central Steel Drum.

e. No.

Document 007

a. 5/30/90.

b. 8 empty open head steel drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of

EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 007. Further answering, ANCC purchased 8 reconditioned steel drums from Central Steel Drum.

e. No.

Document 008

a. 2/19/90.

b. 8 empty open head steel drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 008. Further answering, ANCC purchased 8 reconditioned steel drums from Central Steel Drum.

e. No.

Document 009

a. 7/19/90.

b. 6 empty open head steel drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 009. Further answering, ANCC purchased 6 reconditioned steel drums from Central Steel Drum.

e. No.

Document 010

a. 3/20/91.

b. 8 empty open head steel drums.

c. See answer to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 010. Further answering, ANCC purchased 8 reconditioned steel drums from Central Steel Drum.

e. No.

Document 011

a. 11/9/92.

b. 12 empty open head steel drums and 3 empty closed head steel drums.

c. See response to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 011. Further answering, ANCC purchased 15 drums from Central Steel Drum.

e. No.

Document 012

a. 11/9/93.

b. 15 empty open head steel drums.

c. See response to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 012. Further answering, ANCC purchased 15 reconditioned steel drums from Central Steel Drum.

e. No.

Document 013

a. 8/11/93.

b. 10 empty open head steel drums.

c. See response to Request 6b.

d. ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 013. Further answering, ANCC purchased 10 reconditioned steel drums from Central Steel Drum.

e. No.

Document 014

a. 6/23/93.

b. 10 empty open head steel drums.

c. See response to Request 6b.

d. **ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 014. Further answering, ANCC purchased 10 reconditioned steel drums from Central Steel Drum.**

e. **No.**

Document 015

a. **10/28/91.**

b. **4 empty open head steel drums and 6 closed head steel drums.**

c. **See response to Request 6b.**

d. **ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 015. Further answering, ANCC purchased 10 reconditioned steel drums from Central Steel Drum.**

e. **No.**

Document 016

a. **9/10/91.**

b. **8 empty open head steel drums and 6 closed head steel drums.**

c. **See response to Request 6b.**

d. **ANCC objects to this request on the grounds that it is beyond the scope of EPA authority under CERCLA Section 104(e) and vague as to the phrase "intended purpose." Without waiving these objections, see document no. 016. Further answering, ANCC purchased 14 reconditioned steel drums from Central Steel Drum.**

e. **No.**

Request # 7.

Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.

Response to Request #7

See attached exhibit #1.

Request # 8.

Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.

Response to Request #8

1. **Bill Miller - plant engineer at ANCC Washington, NJ plant.**

2. **Louis Manise - Former Environmental Engineer at ANCC Washington, NJ plant.**

Request # 9.

If you contend that any such Container did not contain any substance at the time of the transaction state whether such container had previously been used by the company to contain any substance, and if so:

a. Identify all substances previously contained within such Containers including its specific chemical constituent, physical state, and other characteristics; and

b. Provide as to such substances, all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

Response to Request #9

The drums shipped to Central Steel Drum contained very small quantities of residue and in all case would be considered RCRA empty under 40 CFR Section 261.7. It is unknown what, if any, substances were present in the drums shipped to Central Steel Drum. All drums purchased by ANCC were reconditioned and completely empty without any substances in the drum.

Request # 10.

Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the

Company, including any process or procedure by which the container was emptied or cleaned.

Response to Request #10

ANCC drained, by gravity, the remaining raw material from the drum before shipping the empty drum.

Request # 11.

If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

Response to Request #11

Empty drums were shipped to Central Steel Drum by their own haulers. Reconditioned drums purchased by ANCC were shipped by Mantek and Lynch Trucking. Mantek phone number was (201) 566-4861. Lynch Trucking's phone number was (908) 689-4019.

Request # 12.

Identify each person consulted in responding to these Questions and correlate each person to the question on which he or she was consulted.

Response to Request #12

ANCC states that Tim Guerra, of counsel to ANCC, provided information in order to respond to all of the interrogatories. In addition, Bill Miller, current ANCC employee, provided information to respond to Requests 2 through 14.

Request # 13.

Identify any other person (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify provide the name, address and telephone number of that person; and the basis of your belief that he or she has such knowledge. For past and present

employees, include their job title and a description of their responsibilities.

Response to Request #13

Louise Manis is a former environmental engineer at the Washington, NJ plant. Ms. Manis was responsible for the shipping of, or purchase of, empty drums at the Washington, NJ facility. Her last know address is 1701 Brandywine Rd., Allentown, PA 18104. Her last known phone number is (601) 391-0311.

Request # 14.

Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

Response to Request #14

ANCC does not have additional information to provide the U.S. EPA that would be responsive to this request.

The foregoing represents the complete response of ANCC to the subject request for information. If there are questions concerning any response or attachment, please contact me at (773) 399-3642.

Very truly yours,

Tim Guerra, Esq.

Enc.

cc: E. Burns Lerum
T. Webster

REQUISITIONED BY: L. MANIS

ACCOUNT REFERENCE: 84821

DELIVER TO: MANIS

PROJECT NO.:

WORK ORDER NO.

VENDOR NOTE

THIS IS NOT A VALID ORDER FOR ITEMS TOTALING MORE THAN $500 UNLESS BLANKET ORDER IS SHOWN

American National Can™

Central Steel Drum Co
704 Doremus Ave.
Newark NJ
201 344-5500

NUMBER: 352- 23813

DATE: 9/10/91

BLANKET ORDER NO.

COMMODITY: 136E

F.O.B.: Wash NJ

TERMS: 1/10/30

SHIP TO: American National Can Company
Route 31
WASHINGTON, NJ 07882

TRIPLICATE INVOICES TO: American National Can Company

(SAME AS SHIP TO UNLESS INDICATED)

SHIP VIA: MANTTER

SHIP TO ARRIVE:

TAXABLE: YES ☐ NO ☒

ITEM	ACCOUNT NO.	QUANTITY	UNIT	DESCRIPTION	NET UNIT PRICE	TOTAL
1	84821	6	ea	55 Gallon 6D Closed Head Drums (New) Acceptable by DOT For Acid Hazardous Waste Disposal	55.00	330.00
2	84821	8	ea	55 Gallon Reconditioned 17H Steel Drums 5/8" Bolt, No Outside Rings Along Wall w/ Gasket + Bolt	20	160.00
3	84821	4	ea	Gasket + 5/8" Bolt For 17H Drums (to replace 6D Gasket + 5/16" Bolt)	No charge .00	.00
				Pickup Mantek (201) 566-4801	0	016

[illegible]

C. Carpenberg

x CONFIRMING DO NOT DUPLICATE

REQUISITIONER: MANIS

TOTAL ORDER AMOUNT: 490.00

IMPORTANT
SHOW ORDER NUMBER AND BLANKET ORDER NUMBER ON ALL INVOICES, CORRESPONDENCE AND SHIPPING PACKAGES

AUTHORIZED SIGNATURE

FORM 3727-R REV. 10/90 MADE IN U.S.A.

REQUISITION - RELEASE ORDER
REQUISITIONER

3

TIERRA-B-002871

AP & P
Atlantic Polymers & Products Inc

APOLAN® International

P.O. Box 790
Oakhurst, NJ 07755 - 0790
Fax: USA 732-938-3376
Phone: 732-922-6570

Atlantec Polymers

20 January 1998

Suzanne Becker
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, NJ 08837

RE: **Request for Information Pursuant to Section 104 (e) of CERCLA, 42 U.S.C. & 9604 (e); Central Steel Drum, Superfund Site, Newark, Essex County, New Jersey**

Dear Miss/Ms./Mrs. Becker,

1.) a.) APOLAN International, Inc
P.O. Box 790
Oakhurst, NJ 07755-0790

Formerly:
Atlantic Polymers & Products, Inc.
P.O. Box 790
Oakhurst, NJ 07755-0790

(Name Change only - see attached Amendment)

b.) Corporation of the State of NJ

c.) Peter Graefe (President)
30 Tudor Dr.
Wayside, NJ 07712-3262

Steven P. Holmes (Vice President)
8 Bucks Dr.
Barnegat, NJ 08005

d.) N/A

e.) N/A

f.) Name Change (see 1a.)

2.) Manufacturing, engineering goods using two component, thermoset, polyurethane. (Name Change (see - 1a.). All other aspects of company remain unchanged since 1985.

AP & P
Atlantic Polymers & Products Inc

APOLAN® International

P.O. Box 790
Oakhurst, NJ 07755 - 0790
Fax: USA 732-938-3376
Phone: 732-922-6570

3.) Processing of two component, thermoset, polyurethane. Cleaning of machines involves use of methylene chloride. Removal of waste products from cleaning machines was not handled by Central Steel Drum (CSD). Instead this type of waste was given to:

- Federal Environmental Services, Inc.
  1100 Northmeadow Parkway
  Suite 108
  Roswell, GA 30076

4.) a.) Yes, Atlantic Polymers & Products, Inc.

b.) CSD picked up empty containers for washing and re-sale or re-use according to EPA Regulation # 40 CFR 261.7.

c.) No contracts - see invoices below:

Invoice #'s (copies attached)	Date
69344	05/21/92
70660	10/30/92
81896	05/17/93
77566	10/15/93

5.) a.) Only one facility. Same as answers to Questions #2 and #3.

b.) Facility Name & Address:
See Question 1a.)

RCRA Identification Number:
EPA ID No. NJD982186835

6.) a.) b.)

Date	# Containers
05/21/92	192
10/30/92	90
05/17/93	144
10/15/93	129

c.) Empty closed-head steel drums

d.) At the time of transaction it was standard practice to re-use the type of containers sold to CSD.

6.) e.) The containers were empty

1.) N/A
2.) N/A

AP & P
Atlantic Polymers & Products Inc

APOLAN® International

P.O. Box 790
Oakhurst, NJ 07755 - 0790
Fax: USA 732-938-3376
Phone: 732-922-6570

7.) Same as 4c.) - copies attached.

8.) Peter Graefe & Steven P. Holmes (see 1c.)

9.)

a.) Substance	b.) Written Analyses
Uniroyal Vibrathane 6020	MSDS (attached)
BASF 1,4-Butanediol	MSDS (attached)

10.) All containers were drained upside down for a minimum of 12 hours before considered empty. At this point any material not drained from the containers will have reacted with moisture from the air to a hard polyurethane elastomer.

11.) N/A

12.) Peter Graefe & Steven P. Holmes - (all questions)

13.) Peter Graefe & Steven P. Holmes - (all questions)

- Peter Graefe (President)
  30 Tudor Dr.
  Wayside, NJ 07712-3262
  PHONE: 732-922-6570

- Steven P. Holmes (Vice President)
  8 Bucks Dr.
  Barnegat, NJ 08005
  PHONE: 732-922-6570

14.) No others known. We dealt with CSD direct.

The Certification Of Answers To Request For Information is attached.

ATT: Certification Of Answers To Request For Information
Company Name Change Amendment
Copies of CSD Invoices
Copies of MSDS Sheets

cc: Michael van Itallie, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey

County of Monmouth

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.

Peter Graefe (President)

Steven P. Holmes (Vice President)
NAME (print or type)

Listed Above

TITLE (print or type)

SIGNATURE

Sworn to me before this

21st day of January, 1998

Notary Public

CAROL C. MEGILL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 24, 2001

FILED

DEC 20 1996

LONNA R. HOOKS
Secretary of State

CERTIFICATE OF AMENDMENT OF THE CERTIFICATE OF INCORPORATION OF ATLANTIC POLYMERS & PRODUCTS, INC.

TO: SECRETARY OF STATE
STATE OF NEW JERSEY

This is to certify that the Certificate of Incorporation of Atlantic Polymers & Products, Inc. (herein referred to as the "Corporation") which was filed and recorded in the office of the Secretary of State, State of New Jersey on July 31, 1985, is hereby amended pursuant to the provisions of N.J.S.A. 14A:9-2 of the "New Jersey Business Corporation Act."

ARTICLE I NAME OF CORPORATION

The name of the Corporation is Atlantic Polymers & Products, Inc.

ARTICLE II DATE OF ADOPTION AND TEXT OF AMENDMENT

The following amendment to the Certificate of Incorporation of Atlantic Polymers & Products, Inc. (the "Amendment") was adopted by the Corporation's shareholders (the "Shareholders") by the unanimous written consent of the shareholders on December 17, 1996 to be effective December 31, 1996.

The First Article of the Corporation's Certificate of Incorporation is amended to read in its entirety as follows:

The name of the Corporation is APOLAN International, Inc.

ARTICLE III APPROVAL OF AMENDMENT

The Corporation has 760 shares of Common Stock outstanding, the holders of which are entitled to vote to approve the Amendment. A Unanimous Written Consent of the Shareholders of Atlantic Polymers & Products, Inc. was executed as of December 17, 1996, by the shareholders approving the Amendment, with 760 shares of Atlantic Polymers & Products, Inc. Common Stock consenting to the Amendment.

Atlantic Polymers & Products, Inc.

By: _____
PETER U. GRAEFE,
President

vl/A-Team/Atlantic Polymers//NAH/D Cert/Amend

UNIROYAL CHEMICAL

Material Safety Data Sheet

Uniroyal Chemical Company, Inc.
World Headquarters
Middlebury, CT 06749

UNIROYAL Emergency Phone: (203) 723-3670
CHEMTREC Transportation Emergency Phone: 1-800-424-9300
SAFETY DATA Information (203) 573-3303

MSDS No. V766011 Date Issued: 10/25/85
Date Revised: 5/5/92; Supercedes: 12/9/91 R-3

IDENTIFICATION

Trade Name: VIBRATHANE® 6020 CAS Number: NA

Chemical Name: Reaction product of a polyester with diphenylmethane diisocyanate (MDI) Chemical Family: Polyurethane

SPECIAL REGULATORY HAZARDS

Ingredient	CAS No.	Exposure Limit	OSHA (1910.1200)	EEC*
MDI	101-68-8	0.02 ppm, ceiling (OSHA) 0.005 ppm, TWA (ACGIH)	Sensitizer	Sensitizer

Hazard assessment based on available data.

Transportation: NA

PHYSICAL DATA

Appearance and Odor: Viscous liquid; slight odor

Solubility: Reacts in water, soluble in THF, DMF, or methylene chloride

Melting Point: ND

Boiling Point: ND

Other Data: Solidification Point: 60°F (22°C)
Reactive Isocyanate (NCO): 2.4 - 9.3

Specific Gravity (H_2O = 1): 1.15 - 1.22

Vapor Pressure @ 20° C. ND

Vapor Density (Air = 1): ND

Volatility @ 70° F: Low

FIRE AND EXPLOSION HAZARD DATA

Flash Point: 400°F (204°C) CC

Autoignition Temp: ND

Extinquishing Media: Water spray, dry chemical

Flammable Limits: ND

Special Fire Fighting Procedures: Protect against inhalation of cyanate vapors and other decomposition/combustion products.

Unusual Hazards: None identified.

REACTIVITY DATA

Stability: Stable at ambient temperatures and pressures.

Incompatibility: Avoid contamination with water, solvents and any foreign matter.

Decomposition Products: High temperatures will release cyanates and hydrocarbons. Oxides of carbon, nitrogen and small amount of HCN under burning conditions.

NA = Not Applicable ND = Not Determined *European Economic Community

SPECIAL PROTECTION INFORMATION

Engineering Controls: Local exhaust ventilation strongly recommended.

Personal Protection Equipment: Chemical resistant gloves and goggles should be worn. Avoid breathing vapors. In the absence of good ventilation, under emergency situations or for high concentrations, self-contained or air-supplied respiratory protection is recommended.

STORAGE, SPILLS AND DISPOSAL INFORMATION

Storage: Store away from sources of direct heat and moisture. Seal containers with a dry nitrogen blanket and keep closed when not in use. Moisture contamination will evolve CO_2 and create pressure in closed systems.

Spills: Absorb on inert carrier. Transfer to open containers outside or in well-ventilated area. Soak with dilute ammonia hydroxide or water alcohol mixture. Allow time for reaction to be complete before disposal.

Disposal: In a well ventilated area, fill drums with a couple of inches of water. Leave bung off and slowly shake and roll drum to allow water contact. Leave open to air for sufficient time to cure. Cured polyurethane is not a RCRA hazardous waste. Dispose of in accordance with local, state or federal regulations regarding polymeric waste. WARNING! Burning this material can produce toxic fumes.
Environmental Information: Environmental effects have not been determined.

HEALTH RELATED DATA

Specific Hazard(s): Contact with eyes and skin may cause irritation. Repeated, minimal contact with skin may cause sensitization. Exposure to vapor can cause irritation to eyes, lungs and mucous membranes. Repeated inhalation of minimal amounts of vapor can cause respiratory sensitization and asthma. Individuals with respiratory problems should avoid exposure to this material.

Primary Route(s) of Entry: Inhalation, skin absorption.

First Aid Procedures: **Eye contact:** Flush with water for 15 minutes. Get medical attention.
Skin contact: Wipe excess. Wash with rubbing alcohol, if available, followed by soap and water. Discard shoes if contaminated.
Inhalation: Remove to fresh air. **Physician** - treat for potential respiratory irritation.

Toxicology Information:

Sensitization: Respiratory and dermal sensitizer based upon human experience (MDI)

Mutagenicity: Ames *Salmonella* - positive (MDI)

SARA TITLE III (40CFR 372)
SECTION 313 TOXIC CHEMICALS NOTIFICATION

TOXIC CHEMICAL	CAS #	% (BY WT.)
Diphenylmethane diisocyanate	101-68-8	11.9

Carcinogenic per NTP _____ IARC _____ OSHA _____ None X

Material Safety Data Sheet

BASF Wyandotte Corporation

100 Cherry Hill Road
Parsippany, New Jersey 07054
201/263-3400

SECTION I

598061

CHEMICAL NAME	1,4-Butanediol	TRADE NAME	Butanediol
SYNONYMS	1,4-Butylene glycol	CHEMICAL FAMILY	Glycols
MOLECULAR WEIGHT	90.1		
CAS REGISTRY NO.	[110-63-4]	FORMULA	$HOCH_2CH_2CH_2CH_2OH$

SECTION II - INGREDIENTS

NAME	%	TLV	TOXICOLOGICAL DATA
1,4-Butanediol	100	50ppm*	Rat, Oral LD_{50} 1.5 g/kg. (1780 mg/kg.) Rabbit, skin--non-irritating Rabbit, eye--slightly irritating

*BASF Wyandotte Corporation recommendation

SECTION III - PHYSICAL DATA

Boiling/Melting Point @ 760 mm Hg	229°C	pH	7 - 8 at 500 gm/l H_2O
Vapor Pressure mm Hg @ 20°C	< 1	Vapor density	3.1
Specific Gravity or Bulk Density	1.0154 @ 25°/4°C	Melting point	20°C
Solubility in Water	Miscible		
Appearance	Colorless oily liquid	Odor	Nearly Odorless Intensity

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (TEST METHOD)	134°C DIN 51758	AUTOIGNITION TEMPERATURE	370°C DIN 51974
FLAMMABILITY LIMITS IN AIR (% BY VOL.)	LOWER	UPPER	

EXTINGUISHING MEDIUM	☒ Water Fog ☒ Foam Alcohol ☒ CO_2 ☒ Dry Chemical ☐ Other
SPECIAL FIREFIGHTING PROCEDURES	Firefighters should be equipped with self-contained breathing apparatus and turn-out gear.
UNUSUAL FIRE AND EXPLOSION HAZARDS	Low, when exposed to heat or flames. Can react with oxidizing materials.

EMERGENCY TELEPHONE NUMBER

CHEMTREC: 800-424-9300 (201)-263-3400

This number is available days, nights, weekends, and holidays.

598061 **SECTION V — HEALTH HAZARD DATA**

THRESHOLD LIMIT VALUE 50 ppm (BWC recommendation)

EFFECTS OF OVEREXPOSURE

Mild irritation may occur on contact with skin and eyes. If swallowed, 1,4-butanediol is a depressant. Symptoms of overexposure include narcosis and loss of reflexes. Kidney damage has been reported following ingestion.

FIRST AID PROCEDURES

EYES: FLUSH WITH FLOWING WATER AT LEAST 15 MINUTES	Eyes--Flush eyes with flowing water at least 15 minutes. If irritation develops, consult a physician. Skin--Wash affected skin areas thoroughly with soap and water. If irritation develops, consult a physician. Ingestion--If swallowed, dilute with water or milk and induce vomiting. Get immediate medical attention. Inhalation--If inhaled, move to fresh air. Aid in breathing, if necessary, and get medical attention.	NEVER GIVE FLUIDS OR INDUCE VOMITING IF PATIENT IS UNCONSCIOUS OR HAVING CONVULSIONS

SECTION VI — REACTIVITY DATA

STABILITY	STABLE	X	CONDITIONS TO AVOID:
	UNSTABLE		

CHEMICAL INCOMPATIBILITY Oxidizers

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID:
	DOES NOT OCCUR	X	

CORROSIVE TO METAL ☒ NO ☐ YES, TYPE: OXIDIZER: ☒ NO ☐ YES

SECTION VII — SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION

Approved organic vapor/mist respirator.

VENTILATION LOCAL EXHAUST: To control to recommended P.E.L.

MECHANICAL (GENERAL):

EYE PROTECTION

Chemical goggles

PROTECTIVE CLOTHING

Gloves, coveralls, apron, boots as necessary to minimize skin contact.

OTHER

SECTION VIII - ENVIRONMENTAL DATA

598061

ENVIRONMENTAL TOXICITY DATA

Not established

SPILL AND LEAK PROCEDURES

Butanediol is not a RCRA regulated product. Spills should be contained, absorbed and placed in suitable containers for disposal.

HAZARDOUS SUBSTANCE "SUPERFUND" ☒ NO ☐ YES → RQ

WASTE DISPOSAL METHOD

Incinerate or bury as a solid after absorption or cementation in a licensed facility. Do not discharge into waterways or sewer systems.

HAZARDOUS WASTE 40CFR261 ☒ NO ☐ YES → HAZARDOUS WASTE NUMBER

CONTAINER DISPOSAL

Dispose of in licensed facility. Recommend crushing or other means to prevent unauthorized reuse.

SECTION IX - SHIPPING DATA

D.O.T. PROPER SHIPPING NAME (49CFR172.101)	HAZARDOUS SUBSTANCE (40CFR116)
None	REPORTABLE QUANTITY (RQ)

D.O.T. HAZARD CLASSIFICATION (49CFR172.101)

PRIMARY *SECONDARY*

None

D.O.T. LABELS REQUIRED (49CFR172.101)	D.O.T. PLACARDS REQUIRED	POISON CONSTITUENT (49CFR173.343)
None	None	

BILL OF LADING DESCRIPTION	CC NO.	UN/NA CODE
Butylene Glycol	331	None

DATE PREPARED 6/28/83

Butanediol

CAUTION:
CONTACT WITH EYES AND SKIN MAY RESULT IN MILD IRRITATION.
IF SWALLOWED, 1,4-BUTANEDIOL IS A DEPRESSANT. SYMPTOMS OF OVEREXPOSURE INCLUDE NARCOSIS AND LOSS OF REFLEXES. KIDNEY DAMAGE HAS BEEN REPORTED FOLLOWING INGESTION.

Use with local exhaust to control to recommended P.E.L. Wear an approved organic vapor/mist respirator, chemical goggles, gloves, coveralls, apron, boots and other protective clothing as necessary to prevent contact.

FIRST AID:

Eyes - Immediately wash eyes with running water for 15 minutes. Get medical attention if irritation develops.

Skin - Wash affected areas with soap and water. Get medical attention if irritation develops.

Ingestion - If swallowed, dilute with water and immediately induce vomiting by sticking finger down victim's throat. Never give fluids or induce vomiting if the victim is unconscious or having convulsions. Get immediate medical attention.

Inhalation - Move to fresh air. Aid in breathing if necessary and get immediate medical attention.

IN CASE OF FIRE:
Use water fog, alcohol foam, CO_2 or dry chemical extinguishing media. Firefighters should be equipped with self contained breathing apparatus and turnout gear. Can react with oxidizing materials.

EMPTY CONTAINERS:
All labeled precautions must be observed when handling, storing and transporting empty containers due to product residues. Do not reuse this container unless it is professional cleaned and reconditioned.

DISPOSAL:
Spilled material, unused contents and empty containers must be disposed of in accordance with local, state and federal regulations. Refer to our Material Safety Data Sheet for specific disposal instructions.

IN CASE OF CHEMICAL EMERGENCY:
Call CHEMTREC day or night for assistance and information concerning spilled material, fire, exposure and other chemical accidents. 800-424-9300

ATTENTION:
This product is sold solely for use by industrial institutions.

Refer to our Technical Bulletin and Material Safety Data Sheet regarding safety, usage, applications, hazards, procedures and disposal of this product. Consult your supervisor for additional information.

Made in U.S.A.

AP & P
Atlantic Polymers & Products Inc

APOLAN® International

P.O. Box 790
Oakhurst, NJ 07755 - 0790
Fax: USA 732-938-3376
Phone: 732-922-6570

30 December 1997

Suzanne Becker
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, NJ 08837

RE: Request for Information Pursuant to Section 104 (e) of CERCLA, 42 U.S.C. & 9604 (e); Central Steel Drum, Superfund Site, Newark, Essex County, New Jersey

Dear Miss/Ms./Mrs. Becker,

We are writing to advise you that we have received an extension for the completion of this report until 21 January 98. The extension was granted via phone by EPA Contractor, Donna Murphy.

Please note our "Company Name Change":

FROM:
Atlantic Polymers & Products, Inc.
P.O. Box 790
Oakhurst, NJ 07755-0790

TO:
APOLAN International
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Regards,

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SH/cao

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