

STREAM CONTAMINATION REPORT & ELIMINATION

District No. 6 Date: 4/5/77 Time: 10:30 A.M.  
Weather: Rain  
Company Name: FLEXON INDUSTRIES CORP.  
Address: 666 Washington Ave., Belleville, N.J. 07109  
Name and Title of Person Contacted: Sol S. Graf, Vice Pres.  
Telephone: 751-5050  
Nature of Business: Plastics  
No. of Outlets: 1  
Method of Waste Disposal: Sanitary Sewer X Combined Sewer \_\_\_\_\_  
Storm Sewer, River, or Ditch \_\_\_\_\_  
If NPDES Permit Is Required: Draft Permit \_\_\_\_\_ Final Permit \_\_\_\_\_  
Violation: Machine cutting oil into yard catch basin into storm sewer  
1. Color \_\_\_\_\_  
2. Odor \_\_\_\_\_  
3. Turbidity \_\_\_\_\_  
4. Estimated Flow (G.P.M.) \_\_\_\_\_  
5. Collection on Banks \_\_\_\_\_  
6. Surface Scum, Foam or Oil \_\_\_\_\_  
7. Approximate Distance Extending Into Stream or River; Width Upstream or  
Downstream \_\_\_\_\_  
8. pH Reaction with Test Paper \_\_\_\_\_ Sample Taken \_\_\_\_\_  
9. Why Sample Not Taken \_\_\_\_\_


(Complete narrative on reverse side)

DBL000050

848020002

Supt. Cupo received a phone call from Mr. Joseph Marino, Inspector Board of Health Town of Belleville, N.J. in regard to Flexon Corp. 666 Washington St., Belleville, N.J. dumping oil into a catch basin. Ass't Supt. Cuccinello and myself went to investigate. We toured the plant grounds and found evidence of a large pool of oil at the yard catch basin. We contacted Mr. Sol Graf, Vice Pres. of the Plant, and showed him what we discovered. He was concerned and did not know what caused this. We told him to clean up this area and also the catch basin. He stated he would have his people do this immediately. We visited the area the next day and found that they had cleaned up the area with speedy dry and Mr. Graf informed us that his investigation found that an employee dumped a drum of cutting oil by accident. He stated he reprimanded the employee and hoped that this would not happen again.

We noticed that this Plant has poor housekeeping. The parking lot is loaded with drums of material. The Town of Belleville is in the process of having this plant clean up the area.

  
Dom DeMarco  
River Inspector

848020003

DBL000051

TIERRA-B-009727

4/29/77 Guicconeello  
DeMarco

S ← E → N

FLEXON INDUSTRIES  
BELLEVILLE, NJ

WASHINGTON ST.

848020004

666  
FLEXON IND. GAP

SPILL-HERE

WALTER KIDDE

ROOSEVELT AVE

ROADWAY

42" STORM SEWER  
ROADWAY

LE. CENTER ST.

MAIN ST.

ROUTE 21

PASSAIC RIVER

DBL0000052

## Firm cited for fire violations

By a Herald-News Correspondent

**BELLEVILLE** — A Washington Avenue plastics remanufacturing plant has been cited for fire code violations and given until the end of the month to correct them, according to Capt. Thomas Nisovocia of the fire prevention bureau.

Flexon Corp., 666 Washington Ave., must address interior problems regarding storage of flammables and fire doors and clean up garbage and piles of bundled materials in its yard area, he said.

The firm takes shredded plastic strippings and remanufactures them into whole rolls of material, he said. The firm had similar problems in April but cleaned them up, he added.

"THEY HAVE a problem of basically not having a large enough building area for all the work they get, but that is their problem not ours," said Nisovocia. "The outside area is a real mess."

The firm was cited for the violations on June 3 and was subject to citizen complaints at the June 6 board of commissioners meeting.

The captain also said that many barrels stored outside the plant contained oil used in its systems and would normally be stored in a 45,000-gallon tanker which is presently being refitted.



The Flexon Corp. at 666 Washington Ave. in Belleville has until the end of the month to correct fire code violations.

Herald-News Photo by Jack Anderson

*HERALD NEWS*  
*TUES. 6/14/83*

DBL000057

6/7/83

To: Chief STARRA

From: Capt. Sorrentino

Subject: Inspection of Flexon Indust. 666 Washington Ave

The initial inspection of premises was performed in April, 1983. At that time various hazards and violations were observed, namely: Storage of flammables not segregated, Fire doors inoperable, Shipping Area in need of house cleaning. There was also large quantities of "raw materials" stored in exterior yard areas and loading dock.

I explained to Mr. Sol Graf, Vice-president that the violation must be corrected and he agreed to cooperate.

A reinspection was conducted on above date and disclosed the following: Fire doors repaired, flammables locked in separate storage area, and Shipping Area was put in order. The "raw materials" condition on exterior has not changed and by appearances worsened. Mr. Graf stated that this

DBL000058

MATERIAL IS UTILIZED IN THE PROCESS OF RECLAIM  
P.V.C. FOR THE PURPOSE OF MANUFACTURING  
VINYL GARDEN HOSE

MR. GRAY IS COOPERATING TO DATE AND  
SEEMS TO BE MAKING PROGRESS TOWARD A  
CLEANER OPERATION, BUT HOUSECLEANING  
IN YARD AREAS IS LACKING.

THIS INSPECTION IS BEING TURNED OVER  
TO CAPTAIN N. SIVUCCIA, SUB-CODE OFFICER, FOR  
DETERMINATION AS TO FUTURE ACTION

Respectfully Submitted  
Capt. V. Sorrentino

DBL000059

## BUREAU OF FIELD OPER. NS

## INVESTIGATIVE REPORT

Inspector: Bruce Verner Date: 7/6/83 Time: 1100 83-6-14-325  
DWM Incident Report #:  
Company Name: Flexon Industries Corp. Telephone: (201) 751-5050  
Street: 666 Washington Ave Property Owner:  
Town: Belleville Address:  
County: Essex  
Lot: \_\_\_\_\_ Block: \_\_\_\_\_  
Type Ownership: Corporation

## Investigative Findings:

At approx. 1020 hrs. on the above date I arrived at the Suburban Regional Health Commission office and met with Inspector Thomas O'Neill. This incident report was referred to the Division of Waste Management by Inspector O'Neill's supervisor, Mr. John Farley. The original complaint was initiated by the Belleville Fire Department.

At approx. 1100 hrs. Inspector O'Neill and I arrived at the Flexon Industries Corporation. The purpose of this inspection was to determine Flexon's waste generation, storage and disposal practices.

In the office we met with Mr. David Miklas, Shipping Manager, and Mr. Raymond Brown, Process Manager. They explained that the process at Flexon is the production of vinyl chloride plastic.

DBL000320

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sheets. This product is manufactured using <sup>vinyl chloride resins and</sup> waste plastic which are brought from companies located across the country. The production starts with a shredding operation. The shredded plastic are then melted down and dyes are added for color. Dye molten plastic is then formed into long sheets, cooled, and placed on rolls.

Waste Production

The only wastes produced at Elexon are waste oils and non-contact cooling water. The waste lubricating oils are generated during process machinery maintenance. The approx. generation rate is 150 gallons per month; however this rate varies according to business. At this time there are approx. 60 full and partially full drums of waste oil on site and a tank trailer containing approx 400 gals. of waste oil. The transporter utilized for waste oil removal is Larry's Waste Oil Service, EPA ID# NJT0030-643, <sup>Excl</sup> NJSWAS6855AA and the TSD Facility is Lionetti Waste Oil.

The non-contact cooling water is used to cool the plastic sheets after they have been formed. Mr. Brown informed us that the cooling

DBL000321



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water is discharged into the Passaic River. I then asked if Flexon had a NJBDES and was told that they do. Whether Mr. Brown or Mr. Miklas knew where a copy of the permit was at the time of my inspection. I was further informed that an inspector from the Passaic Valley Sewage Commission had checked out the outfall and found all in order. I then informed Mr. Brown that our inspector from PUSC would not be inspecting a State permitted discharge for compliance and that I would check on the permits when I returned to the office. There are also several boiler stacks at Flexon. I was told by Mr. O'Neill that he has checked on all of the stack permits and found them in order.

Tour.

After our discussion in the office we went on a tour of the facility. Flexon is currently on a 2 week shutdown / vacation. During this period all of the machinery is maintained and the facility is cleaned. The process areas appeared to be orderly but somewhat cluttered. The only problem noted during our tour was in the

DBL000322

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waste oil storage area. As noted on the attached diagram this area is located on the western side of the facility. Approx. 90% of the dock was covered with plastic, boxes, bags of resin, lubricating oils, and drums of waste oil. The waste oil is stored in 55 gallon drums, on pallets, banded, and stacked 2 high. Under the waste oil drums a spill of what appeared to be oil could be seen. As noted on the map the spilled material extended on three sides of the drum storage area. The approx. area covered by the spill was 20ft x 40 feet. None of the waste oil drums were labeled in any way. A tank trailer, located adjacent to the loading dock contains approx. 400 gallons of waste oil. This was going to be used as a storage vessel; however this idea was aborted when it was discovered that the facility would have to register with the City of Bellville and the State.

All of the waste oil stored on site will be removed, and spilled material cleaned up, within two weeks I was told. I informed Mr. Miklas to be sure that all of the material is manifested.

DBL000303

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Subject: Report

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Findings and Summary:

and removed by a registered hauler to a registered facility. I further informed Mr. Miklos that I would return during the week of 7/21/83 to reinspect the facility. At approx. 1215 hrs. Inspector O'Neill and I left the facility.

Upon returning to the office I contacted Mr. Gaudan Patel, DWR permits section and asked if his section had any record of a NJPDES permit for Flexon. Mr. Patel informed me that he had no record of a discharge permit for Flexon on his print-out, but that they may have applied for one. This is being checked out further in Mr. Patel's office.

After speaking with Mr. Patel I phoned the Passaic Valley Sewage Commission and spoke with Mrs. Graglia, Supervisor Monitoring and Surveillance. Mrs. Graglia informed me that no cooling water is going into the sanitary sewer line. I was further informed that Flexon is not considered an industrial user by PVSC.

DBL000324

CARMINE Y. FERRAPATO  
CHAIRMAN

THOMAS J. CIFELLI  
VICE CHAIRMAN

BERT J. DAVENPORT  
H. W. GORDON  
EPH. M. KEEGAN  
CHARLES A. LAGOS  
COMMISSIONERS

PASSAIC VALLEY SEWERAGE COMMISSIONERS

600 WILSON AVENUE  
NEWARK, N.J. 07103  
(201) 344-1800



118A  
SEYMOUR A. LUBETKIN  
CHIEF ENGINEER

CHARLES C. CARELLA  
CHIEF COUNSEL

MRS. CHARLES T. SCHAEDEL  
CLERK-TREASURER

May 20, 1977

Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, New Jersey

Re: Bi-Monthly Report  
March and April 1977

RECEIVED

JUN - 2 1977

INTERSTATE SANITATION  
COMMISSION

Gentlemen:

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

Part I: Special Reports

#1 - User Charges	Page 1
#2 - Pretreatment of Industrial Waste	Page 7
#3 - The Passaic River March-April 1977	Page 19

Part II: Pollution violations that were eliminated during the month, together with a report on how elimination occurred

Page 26

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

Page 36

848020005

New Jersey Galvanizing and Tinning Works, Inc. (See Annual Report for 1976, page 40)

On March 24, 1977, Mr. G. Blair, Operations Manager, wrote to Mr. Zack, Director of Engineering in Newark, on steps they were taking to control the pH of their discharge. As the former report indicated, the acid discharge apparently caused a collapse of a Newark sewer. He stated that upon investigating the details, the original proposal of batch control was inadequate and asked patience from Newark on the project, since his estimated budget on this problem jumped from \$3,000. to from \$10,000. to \$20,000. The problem still exists.

City of Paterson Debris (See Annual Report for 1976, pg. 43)

The City of Paterson is still waiting for their new crane to be delivered to clear the debris at the foot of East 11th St. They estimate delivery in another month.

\* \* \* \* \*

There were areas where action prevented pollution from occurring:

City of Clifton on April 20, 1977 cemented an 8-inch connection to a sanitary manhole at Broad Street and Garden State Parkway. Inspector Fiore had noticed this when inspecting a drainage ditch in that area. The opening could have allowed a pollution of Pershing Brook.

Flexon Industries Corp. of Belleville cleaned up a large pool of oil at the yard catch basins. Mr. Marino, Inspector of the Town of Belleville, had informed PVSC of the potentially polluting situation, and on April 5, 1977 Sup't. Cuccinello with Inspector DeMarco, after touring the area, directed S. Graf to remove the oil before it was washed into the Passaic River. The general area demonstrated poor housekeeping. Belleville is requiring them to clean the area.

The City of Paterson, while repairing a sewer line break at First Avenue near East 22nd Street, diverted the sewage around the break area back to the sanitary sewer. The break was discovered on March 24, 1977, while investigating complaints of back-up of sewage, and repair work on replacing 33 feet of an 8-inch line was completed as of 4:00 P.M. on March 31, 1977.

Synfax Mfg., Inc. of Belleville, N. J., completed a house cleaning job, particularly at their loading platform, on March 10, 1977. Inspector D. DeMarco, when he inspected the plant on March 3 and 4, found a number of barrels open in their yard. These barrels contained a waste black liquid from the manufacture of photographic toner. The material overflowed onto the yard area and would run into the catch basin during a rain. Mr. A. Gertz, President, was directed to clean the area and have the waste removed. The material was removed by Sangor Tank Disposal Company.

848020006

Violation and Elimination - Flexon Industries Corp.,  
666 Washington Avenue, Belleville, N. J.

April 5-6, 1977 (D. DeMarco)

On April 5, 1977, PVSC received a complaint from Mr. Joseph Marino, Belleville Board of Health Inspector, that Flexon Industries had dumped oil into a storm sewer catch basin. When Sup't. Cuccinello and Inspector DeMarco checked, they saw a large pool of oil at Flexon's yard catch basin. The oil was shown to Mr. Sol Graf, Vice President, and he was directed to clean up the mess.

On April 6, Sup't. Cuccinello and Inspector DeMarco returned to the plant and observed that the oil had been removed. They were told by Mr. Graf that an employee had accidentally dumped a drum of cutting oil into the catch basin. He reprimanded the employee and hoped that this would not happen again. Although no oil was seen in the river, it can be assumed that at least a small quantity did find its way there.

Violation and Elimination - City of Garfield - Schroeders Brook

February 10 - March 25, 1977 (J. Parr & J. McLaughlin)

PVSC inspectors routinely sample the tributaries of the Passaic River in order to check for pollutions. A sample taken of Schroeders Brook, at the entrance to Dahnerts Lake, Garfield, on February 10, 1977, was slightly polluting in that it had a high fecal coliform count (2,000/100 ml). When an investigation failed to uncover the source, it was decided to conduct a sampling survey of Schroeders Brook in order to try and localize the problem.

On February 17 the survey indicated that the pollution had entered the brook between President Street and Dahnerts Lake. Inspector Parr began checking storm sewer catch basins in that area for possible overflows, and on February 23 he observed what appeared to be sewage in a catch basin at the corner of Gaston Avenue and Manner Avenue. The evidence indicated that sewage had flowed into it from a nearby manhole. Further investigation revealed an overflow from a second manhole about 60 feet north of the intersection. The sewage from the second manhole appeared to have flowed onto property owned by Three Saints R. O. Church, then 300 feet downhill and into another catch basin (thence Schroeders Brook).

When Inspector Parr spoke to Mr. M. Olejanz, Church Custodian, he was informed that the manhole near the church overflowed frequently, about once a month. Since this was a problem of the municipal sanitary sewer, the inspector notified PVSC Sup't. Cupo and they met with Mr. Violante, Sewer Department Superintendent of Garfield, later in the day. Mr. Violante explained that there was a broken 8-inch sanitary sewer line on McDonald Street which occasionally caused sewage to back up and overflow onto the street. His records showed that this intermittent problem existed from June 5, 1976.

848020007



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

JUN - 8 2006

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

David Rauch, President  
Flexon Industries Corp.  
One Flexon Plaza  
366 Frelinghuysen Avenue  
Newark, NJ 07114

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

Dear Mr. Rauch:

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

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

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

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

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

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were released from the Flexon Industries Corp. facility located at 666 Washington Avenue in Belleville, New Jersey, into the Lower Passaic River Study Area. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, Flexon Industries Corp. may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

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



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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely yours,

  
Ray Basso, Strategic Integration Manager  
Emergency and Remedial Response Division

Enclosures 6-06