

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WATER RESOURCES

INVESTIGATION MEMORANDUM

OK  
TW  
01-12857  
02-12857

Persons Conducting Investigation

Complaint No./NJDES No. NJ0000940

JOSEPH BAGEN

Date of Investigation 12/4/85

COMPLIANCE INVESTIGATOR

Routing TBH

Location of Incident LAS CHEM

40 AVE A - DAYTON NJ

Purpose of Investigation SPILL OF CASTOR OIL + CAUSTIC SOAP

INTO STORM SEWER

Persons Interviewed DAVID ARMSTRONG - PLANT ENG.

Summary of Findings

5% CAUSTIC - 200 GAL APPROX CASTOR OIL - 3 ELE

REPORTED NON-COMPLIANCE - BROKEN INDUSTRIAL SEWER

PIPE. THIS EFFLUENT (WASTEWATER) USUALLY TO

SANITARY FACILITY HAS DPCC/NER SACC PLAN.

SOAST CLAD INVESTIGATED, SUPERVISED CLEAN UP.

THEY WERE CONCERNED WITH CASTOR OIL -



02-1285

INCIDENT NOTIFICATION REPORT

TRENTON DISPATCH  DIV. OF WASTE MANAGEMENT  DIV. OF ENVIR. QUALITY  DIV. OF WATER RESOURCES  
 HD FIELD OFFICE:  NORTHERN  METRO  CENTRAL  SOUTHERN

DATE 11-27-85 TIME (Military) 1400 REC'D BY BEDRAS m PHONE NO. 609-3960

INCIDENT REPORTED BY: CASE NO. 85-11-27-126M  
NAME P.O. Miller (thru Trenton Dispatch) PHONE 212-668-7922  
STREET \_\_\_\_\_  
CITY BERLIN STATE NJ  
AFFILIATION U.S.C.G.

NATURE OF INCIDENT:  
EMERGENCY:  FIRE  EXPLOSION  DRUMS  SPILL  DERAILMENT  MVA  
COMPLAINT:  SMOKE  ODORS  DUST  SEWAGE  NUISANCE  ILLEGAL DUMPING  
OTHER:

INCIDENT LOCATION:  
NAME (SITE) PH Chem  UNK PHONE 201-858-7900  
STREET 40 Ave. A Bayonne  
CITY BAYONNE COUNTY Hoo STATE NJ ZIP CODE \_\_\_\_\_

STATUS AT SCENE OF INCIDENT: Coast Guard Response Team is Responding  
DATE OF INCIDENT: 11/27/85 TIME: 1400

ANYONE HOSPITALIZED  YES  NO  
AREA EVACUATED  YES  NO  
CONTAMINATION OF  AIR  LAND  WATER  
PUBLIC EXPOSURE  YES  NO  
RECEIVING WATER NO NO POTABLE WATER SOURCE  YES  NO  
WIND DIRECTION \_\_\_\_\_ LOCATION TYPE  CITY  INDUSTRIAL  RURAL

SOURCE OF INCIDENT/PROBLEM:  KNOWN  UNKNOWN  
COMPANY NAME Coschem PHONE 858-7900  
CONTACT David Armstrong TITLE \_\_\_\_\_  
STREET 40 Ave A Bayonne  
CITY Bayonne COUNTY Hudson STATE MT ZIP CODE \_\_\_\_\_

IDENTITY OF SPILLED AND/OR DISCHARGED SUBSTANCE:  KNOWN  UNKNOWN  
NAME OF SUBSTANCE Caustic cleaning oil  
AMT. ~500 gallons SUBSTANCE CONTAINED  YES  NO  UNKNOWN

OFFICIALS NOTIFIED: (A-310)

HEALTH DEPT.: PERSON \_\_\_\_\_ PHONE \_\_\_\_\_ DATE \_\_\_\_\_  
LOCAL MUNIC.: PERSON \_\_\_\_\_ PHONE \_\_\_\_\_ DATE \_\_\_\_\_

INCIDENT REFERRED TO:  BFD  BERG  DCJ  DWR  F&G  BAPC  HD

1. PERSON \_\_\_\_\_ PHONE \_\_\_\_\_ DATE \_\_\_\_\_  
2. PERSON \_\_\_\_\_ PHONE \_\_\_\_\_ DATE \_\_\_\_\_

COMMENTS:

CAUSTIC OIL FROM Reactor Solution cleaning overflowed  
w 500 gallons in water  
Coast Guard is Responding will inform if Assistance  
is required

REPORT OF PHONE CALL OR VISIT

Bureau or Office Metro

In  Out

File 01-1285

Date 11/27/85 Time 11:30

Routing TBH

Person Contacted Trenton Dispatch Phone No. \_\_\_\_\_

Affiliation \_\_\_\_\_

Subject of <sup>Call</sup> Visit spill

Summary of <sup>Call</sup> Visit At 11:16 am Mr. Witek of

Cas Chem Corp. 40 Avenue A. Bayonne  
reported the spill of castor oil and  
caustic soap into the storm sewer.

The spill occurred at 10:16 am.  
858-7900.

Action Recommended \_\_\_\_\_

Cane

Signature



DUA-4



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF FISH, GAME AND WILDLIFE  
RUSSELL A. COCKINGHAM  
DIRECTOR

PLEASE REPLY TO:  
CN 400  
TRENTON, NEW JERSEY 08625

7Jan86

Mr. Westmert Witek  
Caschem  
40 Ave A  
Bayonne, N.J., 08002

Dear Sir,

On 2Dec85, personnel from the N.J. Div. of Fish, Game, & Wildlife conducted a followup investigation on an incident which occurred on 27Nov85. It was determined that during the cleaning of a reactor vessel, a solution of oil, gasoline, caustic oil leaked out into sewer drains and an indeterminate amount reached the waters of the State. The spill originated at the Caschem facility.

This incident is a violation of Title 23, N.J. Revised Statutes, copy enclosed. A notice of violation is attached. Deputy Attorney General Neil Magnus, N.J. Dept. of Law & Public Safety, CN-112, Trenton, N.J., 08625, (609-292-6945) may be contacted regarding this notice.

Very Truly Yours,

John L. Mihatov  
Lt., Bureau of Law Enforcement

RECEIVED

JAN 08 1986

DEPT. ENVIRONMENTAL PROTECTION  
NEWARK OFFICE



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF FISH, GAME AND WILDLIFE RUSSELL A. COOKINGHAM DIRECTOR

PLEASE REPLY TO: CN 400 TRENTON, NEW JERSEY 08625

RETURN RECEIPT REQUESTED

Mr. Castnet Witek Caschem 40 Ave. A Bayonne, N.J., 07002

DATE: 7Jan86

NOTICE OF VIOLATION

Gentlemen:

Investigation by personnel of this Division on 2Dec85 found your firm to be in violation of N.J.S.A. 23:5-28 by virtue of an unauthorized discharge of deleterious materials.

N.J.S.A. 23:5-28 Draining deleterious substances into waters prohibited:

"No person shall put or place into, turn into, drain into or place where it can run, flow, wash or be emptied into, or find its way into any of the fresh or tidal waters within the jurisdiction of this State, any petroleum products, debris, hazardous, deleterious, destructive or poisonous substances of any kind. . . A person violating this section shall be liable to a penalty of not more than \$6000.00 for each offense."

The statute permits the State to compromise and settle any claim for a penalty against Caschem This violation may be settled by payment of \$800.00

You are reminded that the aforementioned statute has been interpreted to impose strict liability upon the responsible party.

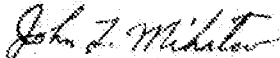
Should you desire to settle this demand for a penalty, payment must be received not later than 31Jan86 in the form of a money order or certified check drawn to the order of the New Jersey Division of Fish, Game, & Wildlife. This is to be sent to Russell A. Cookingham, Director, CN-400, Trenton, N.J., 08625, and a copy of the cover letter is to be sent to me at the Bureau of Freshwater Fisheries, PO Box 394, Lebanon, N.J., 08833.

In the event payment is not made in the time specified, action will be taken to refer the matter to the Deputy Attorney General to initiate prosecution for the maximum penalty of \$6000.00.

This proposal of settlement is without prejudice as to the State's position in the event this settlement is unacceptable to you.

The issuance of this document does not preclude other State agencies from initiating further administrative or legal action, or from the assessing of penalties, with respect to this or other violations.

Very truly yours,



Lt. John L. Mihatov  
Bureau of Law Enforcement

cc: R.A. Cookingham, Director  
N. Magnus, D&G  
Chief, Bu. of Law Enforcement  
A. Bruce Pyle, Fisheries  
Office of Regulatory Services

CHAPTER 173, Laws of 1971  
Senate No. 928, Approved: 5/1/71

AN ACT concerning the prevention and abatement of pollution of the waters of this State resulting from the discharge therein of petroleum products, debris, and hazardous substances, and amending R.S. 23:5-28, 23:9-36, and 23:9-32.

23:5-28. No person shall put or place into, turn into, drain into, or place where it can run, flow, wash, or be emptied into, or where it can find its way into any of the fresh or tidal waters within the jurisdiction of this State any petroleum products, debris, hazardous, deleterious, destructive or poisonous substances of any kind; provided, however, that the use of chemical by any State, County, or Municipal government agency in any program of mosquito or other pest control or the use of chemical by any person on agricultural, horticultural or forestry crops, or in connection with livestock, or aquatic weed control or structural pest and rodent control, in a manner approved by the State Department of Environmental Protection or discharge from facilities for the treatment, or the disposal of sewage or other wastes in a manner which conforms to rules and regulations promulgated by the State Department of Environmental Protection, shall not constitute a violation of this section. In case of pollution of said waters by any substance injurious to fish, birds, or mammals, it shall not be necessary to show that the substances have actually caused the death of any of these organisms. A person violating this section shall be liable to a penalty of not more than \$5000.00 for each offense, to be collected in a summary proceeding under the Penalty Enforcement Law (N.J.S. 2A:58-1 et seq.), and in any case before a court of competent jurisdiction wherein injunctive relief has been requested. The Superior Court, County Court, and county district court shall have jurisdiction to enforce said Penalty Enforcement Law. If the violation is of a continuing nature, each day during which it continues shall constitute an additional, separate and distinct offense. The department is hereby authorized and empowered to compromise and settle any claim for a penalty arising under this section in such amount as the discretion of the department as may appear appropriate and equitable under all of the circumstances. The department may institute a civil action in a court of competent jurisdiction for injunctive relief to prohibit and prevent any person from violating the provisions of this section and said court may proceed in the action in a summary manner.

*Hamilton*

Let's protect our earth



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

GEORGE G. McCANN, P.E.  
DIRECTOR

DIRK C. HOFMAN, P.E.  
DEPUTY DIRECTOR

June 29, 1988

Mr. Douglas Deatrick  
Manager of Engineering  
Cas Chem, Incorporated  
40 Avenue A  
Bayonne, NJ 07002

Re: Compliance Evaluation Inspection  
Cas Chem, Incorporated  
NJPDES No. NJ 0000949  
Bayonne/Hudson County

Dear Mr. Deatrick:

A Compliance Evaluation Inspection of your facility was conducted by a representative of this Division on January 6, 1988. A copy of the completed inspection report form is enclosed for your information.

Your facility received a rating of "UNACCEPTABLE" due to the following deficiency:

At the time of inspection, very turbid wastewater was observed being discharged from the facility to the surface waters of the State (designated DSN 001).

Since the deficiency cited is presently, or could, in the future, adversely affect effluent quality, you are DIRECTED to institute measures to correct the deficiency. A written report concerning specific details of remedial measures to be instituted, as well as an implementation timetable, must be submitted to this Department and USEPA, Permits Administration Branch, within thirty (30) calendar days of the date of this correspondence.

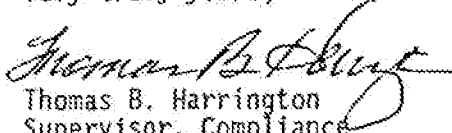
BAK000008

Both the New Jersey Water Pollution Control Act (N.J.S.A. 58:10A-1 et seq.) and the Federal Water Pollution Control Act, as amended (33 U.S.C. 468 et seq.) provide for substantial monetary and criminal penalties in cases of permit violations.

Please direct all correspondence and inquiries to Maureen C. Coates, the Environmental Specialist responsible for this case, who can be reached at (201) 669-3900 or by letter through this Division.

Failure to fully comply with the above will result in the initiation of enforcement action by this Department and/or the United States Environmental Protection Agency. This shall in no way be construed, however, to indicate any exemption on your part from possible penalties for violations indicated by the Compliance Evaluation Inspection, as stated above.

Very truly yours,

  
Thomas B. Harrington  
Supervisor, Compliance  
Monitoring Unit  
Metro Bureau of  
Regional Enforcement

E10:G25

c: Dr. Richard A. Baker, USEPA  
Mr. Paul Molinari, USEPA  
Mrs. Maryann Walsh, H.O.

Enclosure

bc: Zaheer Hussain, Enforcement  
Robert Candido, Criminal Justice

# U.S. agents stage raid on Bayonne chemical plant in toxic waste probe

By WILLIAM T. QUINN  
and KEVIN R. RICHARDSON

More than 20 agents from the U.S. Environmental Protection Agency (EPA), the FBI and the Customs Service launched a surprise search of the CasChem Inc. chemical plant in Bayonne yesterday to determine if the company violated regulations on the handling of hazardous materials.

"There have been allegations that federal laws have been violated dealing with the storage and disposal of toxic wastes, and we're collecting information regarding those violations," said Joe Russo, special agent in charge for the EPA's Office of Criminal Investigations.

Company officials strongly denied any violations at the plant.

"We have no discharges and are not in violation of any of our permits in terms of what we put in (Newark) Bay. I just don't run a business like that. It's an absolute shocker to us," said Cyril C. Baldwin Jr., chief executive officer of East Rutherford-based Camorex Corp., a specialty chemical manufacturer that owns CasChem.

The agencies said the search would involve an examination of substances stored at the plant as well as records pertaining to the handling, transportation and disposal of hazardous wastes.

Officials said their search would extend to both the plant and an adjacent pier leased by the company from Texaco and used for storage.

The federal agencies declined to discuss the allegations or say when the investigation began. An official said the affidavit presented to obtain the warrant was sealed.

Company officials said they had no knowledge of any violations which would lead to such a search.

Albert J. Elender, president of CasChem, said he had instructed company employees to cooperate fully, including allowing themselves to be interviewed by the FBI. "We have absolutely nothing to hide," he added.

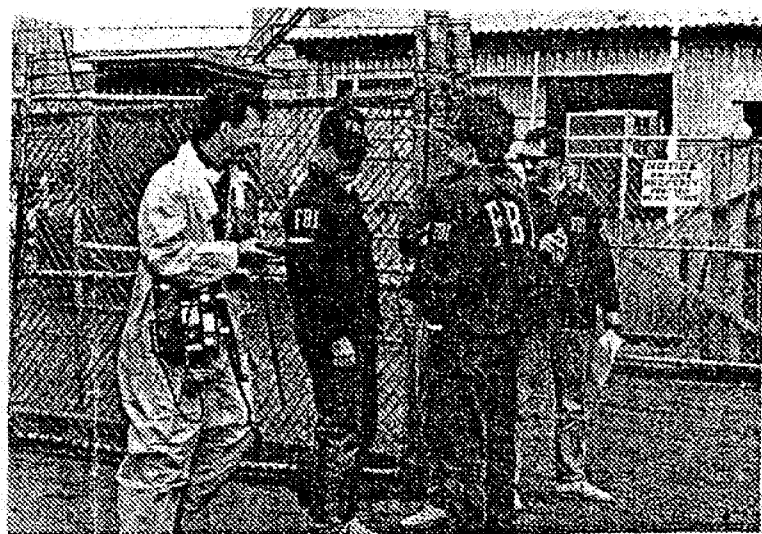
Baldwin said while the manufacturing processes at the plant do generate some hazardous waste materials, the company turns them over to licensed firms for burning or other legal disposal.

The company, in the course of manufacturing castor oil derivatives and urethane products at the plant, uses sulfuric acid, hydrochloric acid, isocyanates and various solvents but is careful to handle them in compliance with environmental regulations, Baldwin said.

The castor oil products made at



Albert J. Elender, president of CasChem Inc., right, and company attorney Dennis Gleason leave the firm's offices in Bayonne.



FBI agents and an EPA inspector stand outside a gate at the CasChem Inc. chemical plant in Bayonne.

the plant are used in a wide range of cosmetics and chemical intermediates. The urethanes are used primarily as sealers for underground telephone cables.

The search warrant delivered by the federal agents mentioned possible violations of the federal Resource Conservation and Recovery Act. But Baldwin said yesterday. "As far as we know we're out of compliance with anything that's covered by that act."

Federal officials arrived at the plant at 11 a.m., according to an FBI spokesman.

No traffic was allowed in or out of the plant for 1 1/2 hours while EPA technicians performed an air quality study to see if there was any immediate danger from toxic discharges, Russo said.

Customs officials were stationed in a boat in Newark Bay as part of the effort to seal the facility, officials said.

When officials determined there was no danger, the plant was allowed to reopen.

Russo said the EPA planned to do extensive testing of substances stored in approximately 4,000 drums at the production facility, adding that there appeared to be no drum leaks.

Preliminary testing, to be conducted on CasChem premises, is scheduled to continue throughout the week, he said.

Following the on-site testing, samples of some chemicals will be sent to the EPA's laboratory in Denver for further analysis, he said, adding that all the analyses could take several weeks.

Nothing that the on-site testing was to assure the plant posed no health risk, he said the EPA would not leave the plant until the agency was certain there were no leaks.

"If we find anything dangerous,

we'll move it out of the area and dispose of it," he said.

Gary Penrith, acting special agent in charge for the FBI, said removal of pertinent records would take a day. He offered no estimate on how long the examination of the documents might take.

"There are rules for storage, disposal and labeling, and we're looking to see if everything was handled properly," he said.

He added that FBI personnel would remain at the plant as long as the EPA continues its investigation.

The officials said any information

derived from the search would be turned over to the U.S. Attorney's Office.

Penrith said company employees were "assisting us in every way possible." He said the assistance included running computer printouts of records in an effort to save time.

"When the FBI comes knocking, it kind of gets your attention. But when we realized what they wanted, we settled down to cooperating," said Elender.

He said he planned to try to resume normal company operations

today in all departments except production, where the EPA would continue to focus its investigation.

Baldwin and a group of investors acquired the Bayonne plant from NL Industries in 1981 and used it as the basis for forming Camorex.

The company has grown from earnings of \$188,000 to sales of \$37.1 million in 1982 to earnings of \$3 million on total sales of \$131 million last year.

The Bayonne plant has been used for chemical manufacturing since 1965 and was operated by the Baker Castor Oil Co. for many years.

HOLIDAY SPECIAL

Let's protect our earth



*State of New Jersey*  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WATER RESOURCES

CN 029

Trenton, N.J. 08625-0029

Eric J. Evenson  
Acting Director

(609) 292-1637  
Fax # (609) 984-7938

May 18, 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Stuart B. Cooper, Manager Regulatory Affairs  
CasChem Corporation  
A Subsidiary of Cambrex Corporation  
40 Avenue A  
Bayonne, New Jersey 07002

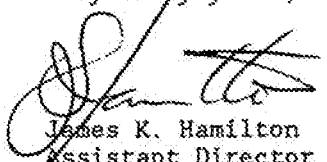
Dear Mr. Cooper:

Re: Administrative Order and  
Notice of Civil Administrative Penalty Assessment  
CasChem Corporation  
NJPDES No. NJ0000949  
Bayonne/Hudson County

There is enclosed for service upon you an Administrative Order and Notice of Civil Administrative Penalty Assessment issued by the Department pursuant to the provisions of the Water Pollution Control Act, N.J.S.A. 58:10A-10b and d.

If you have any questions concerning this Administrative Order and Notice of Civil Administrative Penalty Assessment please contact Mr. Peter T. Lynch, Chief, Metro Bureau of Regional Enforcement, 2 Babcock Place, West Orange, New Jersey 07052 or by telephoning (201) 669-3900.

Very truly yours,

  
James K. Hamilton  
Assistant Director  
Enforcement Element

Enclosure

*New Jersey is an Equal Opportunity Employer*

BAK000015

TIERRA-B-016164



c: Peter T. Lynch, P.E., Bureau Chief  
Jeanne Massavelli, Health Officer  
John Fields, WFME  
Chief, Permits Administration Branch, USEPA  
Mr. Patrick Durack, USEPA  
Robert Dresdner, Division of Regulatory Affairs



*State of New Jersey*  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 DIVISION OF WATER RESOURCES  
 CN 029  
 Trenton, N.J. 08625-0029

Eric J. Evenson  
 Acting Director

(609) 292-1637  
 Fax # (609) 984-7938

IN THE MATTER OF : ADMINISTRATIVE ORDER AND  
 CASCHEM : NOTICE OF CIVIL ADMINISTRATIVE  
 CORPORATION : PENALTY ASSESSMENT  
 BAYONNE/HUDSON COUNTY :

This Administrative Order and Notice of Civil Administrative Penalty Assessment is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (hereinafter "NJDEP" or "Department") by N.J.S.A. 13:1D-1 et seq. and the Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., and duly delegated to the Assistant Director or Bureau Chief of the Division of Water Resources, Enforcement Element pursuant to N.J.S.A. 13:1B-4.

FINDINGS

1. The CasChem Corporation (hereinafter "CasChem") operates a facility located at 40 Avenue A, Bayonne, Hudson County, New Jersey (Block 478, Lot 30.B, Block 512, Lot 34, and Plot B, and Block 513, Plot A.1).
2. NJDEP issued a NJPDES Discharge to Surface Water Permit No. NJ0000949 (hereinafter "the DSW Permit") to CasChem on June 11, 1984. The effective date of the Permit was August 1, 1984 and the expiration date is July 31, 1989.
3. Pursuant to the DSW Permit, CasChem discharges pollutants, as defined by N.J.A.C. 7:14A-1.9, from Discharge No. 001A into the Newark Bay, a surface water of the State.
4. No person shall discharge any pollutant except in conformity with a valid NJPDES Permit issued pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq.
5. CasChem's DSW Permit expired on July 31, 1989. Pursuant to the "Administrative Procedures Act" N.J.S.A. 52:14B-11, the conditions of the

ADMINISTRATIVE ORDER AND  
NOTICE OF CIVIL ADMINISTRATIVE  
PENALTY ASSESSMENT  
PAGE 2 OF 5

expired permit are continued in force until the effective date of a new permit since CasChem has submitted Permit renewal applications.

6. Part IV Page 13 of Permit set forth specific parameters to be reported on Discharge Monitoring Report Forms (hereinafter "DMRs") and identify discharge limitations for each parameter for the permitted outfall.

7. CasChem has submitted DMRs to NJDEP as required by Part II Page 6 DSW Permit for the period of January 1, 1987 through January 31, 1990. The DMRs demonstrate that CasChem has violated the discharge limits of the Permit. Listed below are the dates and parameters which were violated.

Monitoring Period	Outfall #	Discharge Parameter	Permit Limits	Reported Results
8/1/88-10/31/88	001A	TSS (net)	34 kg/d avg.	87.2 kg/d ✓
8/1/88-10/31/88	001A	TSS (net)	110 kg/d max.	196 kg/d ✓
11/1/88-1/31/89	001A	TSS (net)	34 kg/d avg.	68.4 kg/d ✓
11/1/88-1/31/89	001A	TSS (net)	110 kg/d max.	120 kg/d ✓
2/1/89-4/30/89	001A	TSS (net)	34 kg/d avg.	149 kg/d ✓
2/1/88-4/30/89	001A	TSS (net)	110 kg/d max.	410 kg/d ✓
11/1/89-1/31/90	001A	TSS (net)	34 kg/d avg.	134.4 kg/d ✓
11/1/89-1/31/90	001A	TSS (net)	110 kg/d max.	446.9 kg/d ✓
5/1/87-7/31/87	001A	TOC (net)	68 kg/d max.	277 kg/d ✓
2/1/89-4/30/89	001A	TOC (net)	68 kg/d max.	1050 kg/d ✓
5/1/87-7/31/87	001A	O & G (net)	43 kg/d max.	95.2 kg/d ✓
11/1/87-1/31/88	001A	Temperature	11.1 deg C (winter)	16 deg C ✓

The following abbreviations were used in the table above: TSS for Total Suspended Solids; TOC for Total Organic Carbon; O & G for Oil and Grease; Deg C for degrees Celsius; kg/d for kilograms per day; avg for average; max for maximum.

8. Based on the facts set forth in these FINDINGS, the Department has determined that CasChem has violated the Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., specifically N.J.S.A. 58:10A-6, and the regulations promulgated pursuant thereto, N.J.A.C. 7:14A-1 et seq., specifically N.J.A.C. 7:14A-1.2.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

9. CasChem shall discharge pollutants only in conformity with NJPDES Permit No. NJ0000949, the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., and the regulations promulgated pursuant thereto, N.J.A.C. 7:14A-1.1 et seq.

10. Obligations and penalties of this Administrative Order are imposed pursuant to police powers of the State of New Jersey for the enforcement of the law and the protection of the public health, safety, welfare and

environment and are not intended to constitute a debt or debts which may be limited or discharged in a bankruptcy proceeding.

11. This Administrative Order shall be effective upon receipt.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

12. Pursuant to N.J.S.A. 58:10A-10d and N.J.A.C. 7:14-8.1 et seq., and based upon the above FINDINGS, NJDEP has determined that a civil administrative penalty should be assessed against CasChem in the amount of \$260,750.00. NJDEP's rationale for this Civil Administrative Penalty is set forth in Appendix A which is attached hereto and incorporated herein.

13. Payment of the penalty is due when a final order is issued by the Commissioner subsequent to a hearing if any, or when this Notice of Civil Administrative Penalty Assessment becomes a final order (see following paragraph). Payment shall be made by certified or cashier's check payable to "Treasurer, State of New Jersey" and shall be submitted with the white copy of Form DEP - 062A to:

Bureau of Revenue  
New Jersey Department of Environmental Protection  
CN 402  
Trenton, New Jersey 08625-0402

14. If no request for a hearing is received within twenty (20) calendar days from receipt of this Notice of Civil Administrative Penalty Assessment, it shall become a final order upon the twenty-first calendar day following its receipt by CasChem, and the penalty shall be due and payable.

15. Notice is given that pursuant to N.J.S.A. 58:10A-10d and N.J.A.C. 7:14-8.12, the Department may, in addition to any civil administrative penalty assessed, amend such penalty assessment to include a civil administrative penalty for the economic benefit (in dollars) which the violator has realized as a result of not complying, or by delaying compliance, with this Act.

NOTICE OF RIGHT TO A HEARING

16. CasChem is entitled to an administrative hearing. Any hearing request shall be delivered within twenty (20) calendar days after receipt by CasChem of this Administrative Order and Notice of Civil Administrative Penalty Assessment to:

Mr. Peter T. Lynch, P.E., Chief  
New Jersey Department of Environmental Protection  
Division of Water Resources  
Metro Bureau of Regional Enforcement  
2 Babcock Place  
West Orange, New Jersey 07052

17. CasChem shall, pursuant to N.J.A.C. 7:14-8.4(a) in its request for a hearing furnish NJDEP with the following:

ADMINISTRATIVE ORDER AND  
NOTICE OF CIVIL ADMINISTRATIVE  
PENALTY ASSESSMENT  
PAGE 4 OF 5

- a. The name, address and telephone number of CasChem and its authorized representative;
- b. CasChem's defenses to each of the findings of fact stated in short and plain terms;
- c. an admission or denial of each of the findings of fact. If CasChem is without knowledge or information sufficient to form a belief as to the truth of a finding, CasChem shall so state and this shall have the effect of a denial. A denial shall fairly meet the substance of the findings denied. When CasChem intends in good faith to deny only a part or a qualification of a finding, CasChem shall specify so much of it as is true and material and deny only the remainder. CasChem may not generally deny all of the findings but shall make all denials as specific denials of designated findings. For each finding CasChem denies, CasChem shall allege the fact or facts as CasChem believes it or them to be;
- d. information supporting the request and specific reference to/or copies of other written documents relied upon to support the request;
- e. an estimate of the time required for the hearing (in days and/or hours); and,
- f. a request, if necessary, for a barrier-free hearing location for physically disabled persons;

GENERAL PROVISIONS

18. This Administrative Order and Notice of Civil Administrative Penalty Assessment is binding on CasChem, its principals, directors, officers, agents, successors, assigns, any trustee in bankruptcy or other trustee, and any receiver appointed pursuant to a proceeding in law or equity.

19. CasChem shall submit all documents required by this Administrative Order and Notice of Civil Administrative Penalty Assessment by certified mail, return receipt requested or by hand delivery to the address in Paragraph 16 above. Penalty payments shall be made in the same manner to the address in Paragraph 13 above.

20. Notice is given that pursuant to N.J.S.A. 58:10A-10d, NJDEP is authorized to assess a civil administrative penalty of not more than \$50,000 for each violation, and each day during which the violation continues shall constitute an additional, separate and distinct offense.

21. Notice is given that this Administrative Order and Notice of Civil Administrative Penalty Assessment is issued only for the violations identified in the Findings hereinabove and that violations of any statutes, rules or permits other than those herein cited may be cause for additional enforcement actions, either administrative or judicial, being instituted without further

ADMINISTRATIVE ORDER AND  
NOTICE OF CIVIL ADMINISTRATIVE  
PENALTY ASSESSMENT  
PAGE 5 OF 5

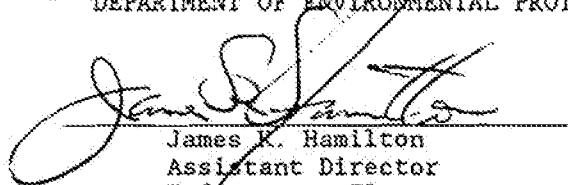
notice. By issuing this Administrative Order and Notice of Civil Administrative Penalty Assessment the Department does not waive its rights to initiate additional enforcement actions.

22. Notice is further given that pursuant to N.J.S.A. 58:10A-10e, any person who violates N.J.S.A. 58:10A-1 et seq., or an administrative order issued pursuant to N.J.S.A. 58:10A-10b, or who fails to pay the civil administrative penalty in full after it is due shall be subject to a civil penalty not to exceed \$50,000 per day of such violation, and each day's continuance of the violation shall constitute an additional, separate and distinct violation.

23. Notice is further given that pursuant to N.J.S.A. 58:10A-10f, any person who willfully or negligently violates this act shall, upon conviction, be guilty of a crime of the fourth degree and shall be punished by fine of not less than \$5,000 nor more than \$50,000 per day of violation, or by imprisonment for not more than one year or by both. Punishment for a second offense under this subsection shall be a fine of not less than \$10,000 nor more than \$100,000 per day of violation, or by imprisonment for not more than two years, or both. Any person who knowingly makes a false statement, representation, or certification in any application, record, or other document filed or required to be maintained under this act or who falsifies, tampers with or knowingly renders inaccurate, any monitoring device or method required to be maintained pursuant to this action shall, upon conviction, be subject to a fine of not more than \$20,000.00 or by imprisonment for not more than six months, or by both.

BY THE AUTHORITY OF  
ERIC J. EVENSON  
ACTING DIRECTOR  
DIVISION OF WATER RESOURCES  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DATE: May 18, 1990

  
James K. Hamilton  
Assistant Director  
Enforcement Element

A P P E N D I X A

P E N A L T Y R A T I O N A L E

CasChem Incorporated  
Bayonne, New Jersey

PART A

Discharge of Effluent in Excess of Permit Limitations  
N.J.A.C. 7:14-8.5

SERIOUSNESS: Pursuant to N.J.A.C. 7:14-8.5(e)1.ii(2) the seriousness factor is considered to be major when a discharge violation has exceeded the effluent limitation set forth in the Permit by more than 100 percent for a non-hazardous pollutant. Since Total Suspended Solids (TSS) and Total Organic Carbon are considered non-hazardous pollutants and the permit effluent limitation has been exceeded by more than 100 percent, the seriousness factor is considered to be major.

CONDUCT: Pursuant to N.J.A.C. 7:14-8.5(f)2, the conduct is considered to be moderate when actions taken by the violator are considered unintentional but foreseeable. Since CasChem consistently violated the effluent limitations set forth in its Permit, the conduct is moderate.

Pursuant to N.J.A.C. 7:14-8.5(d), the civil administrative penalty assessed for each violation is \$35,000.

Discharge 001A

Four (4) Total Suspended Solids (TSS) violations from the DMRs for the periods 2/1/89 to 4/30/89, and 11/1/89 to 1/31/90, one (1) Total Organic Carbon violation from the DMR for the period 2/1/89 to 4/30/89.

Monitoring Period	Discharge Parameter	Permit Limits	Reported Results
Discharge 001A			
2/1 - 4/30/89	TSS(net)	34 kg/d (avg.)	149 kg/d ✓
2/1 - 4/30/89	TSS(net)	110 kg/d (max.)	410 kg/d ✓
11/1/89-1/31/90	TSS(net)	34 kg/d (avg.)	134.4 kg/d ✓
11/1/89-1/31/90	TSS(net)	110 kg/d (avg.)	446.9 kg/d ✓
2/1 - 4/30/89	TOC(net)	68 kg/d (max.)	1050 kg/d ✓

PART A FORMULA : \$35,000 x 5 Violations = \$175,000

PART B

Discharge of Effluent in Excess of Permit Limitations  
N.J.A.C. 7:14-8.5

SERIOUSNESS: Pursuant to N.J.A.C. 7:14-8.5(e)1.ii(2) the seriousness factor is considered to be major when a discharge violation has exceeded the effluent limitation set forth in the Permit by more than 100 percent for a non-hazardous pollutant. Since Total Suspended Solids (TSS) and Total Organic Carbon (TOC) are considered non-hazardous pollutants and the Permit effluent limitations have been exceeded by more than 100 percent the seriousness factor is considered to be major.

CONDUCT: The Department does not currently have information in its possession that would support the firm conclusion that the violations are due to intentional, deliberate, purposeful, knowing, willing or foreseeable conduct on the part of the violator. Therefore the conduct is minor.

Pursuant to N.J.A.C. 7:14-8.5(d), the civil administrative penalty assessed for each violation is \$20,000.

Discharge 001A

One (1) Total Suspended Solids (TSS) violation from the DMR for the period 8/1/88 to 10/31/88, one (1) Total Organic Carbon (TOC) violation from the DMR for the period 5/1/87 to 7/31/87, one (1) Oil and Grease Violation from the DMR for the period 5/1/87 to 7/31/87.

Monitoring Period	Discharge Parameter	Permit Limits	Reported Results
Discharge 001A			
8/1 - 10/31/88	TSS(net)	34 kg/d (avg.)	87.2 kg/d ✓
5/1/87 - 7/31/87	TOC(net)	68 kg/d (max.)	277 kg/d ✓
5/1/87 - 7/31/87	O&G(net)	43 kg/d (max.)	95.2 kg/d ✓

PART B FORMULA : \$20,000 x 3 Violations = \$60,000

PART C

Discharge of Effluent in Excess of Permit Limitations  
N.J.A.C. 7:14-8.5

SERIOUSNESS: Pursuant to N.J.A.C. 7:14-8.5(e)2.ii(2) the seriousness factor is considered to be moderate when a discharge violation has exceeded the effluent limitation set forth in the Permit by 51 to 100 percent for a non-hazardous pollutant. Since Total Suspended Solids (TSS) is considered a non-hazardous pollutant and the Permit effluent limitation has been exceeded by 51 to 100 percent the seriousness factor is considered to be moderate.



CONDUCT: Pursuant to N.J.A.C. 7:14-8.5(f)2, the conduct is considered to be moderate when actions taken by the violator are considered unintentional but foreseeable. Since CasChem consistently violated the effluent limitations set forth in its Permit, the conduct is moderate.

Pursuant to N.J.A.C. 7:14-8.5(d), the civil administrative penalty assessed for each violation is \$15,000.

Discharge 001A

One (1) Total Suspended Solids (TSS) violation from the DMR for the period 11/1/88 to 1/31/89.

Monitoring Period	Discharge Parameter	Permit Limits	Reported Results
Discharge 001 11/1/88-1/31/89	TSS(net)	34 kg/d (avg.)	68.4 kg/d ✓

PART C FORMULA: \$15,000 x 1 violation = \$15,000

#### PART D

Discharge of Effluent in Excess of Permit Limitations  
N.J.A.C. 7:14-8.5

SERIOUSNESS: Pursuant to N.J.A.C. 7:14-8.5(e)2.ii(2) the seriousness factor is considered to be moderate when a discharge violation has exceeded the effluent limitation set forth in the Permit by 51 to 100 percent for a non-hazardous pollutant. Since Total Suspended Solids (TSS) is considered a non-hazardous pollutant and the Permit effluent limitation has been exceeded by 51 to 100 percent the seriousness factor is considered to be moderate.

CONDUCT: The Department does not currently have information in its possession that would support the firm conclusion that the violations are due to intentional, deliberate, purposeful, knowing, willing or foreseeable conduct on the part of the violator. Therefore the conduct is minor.

Pursuant to N.J.A.C. 7:14-8.5(d), the civil administrative penalty assessed for each violation is \$4,500.

Discharge 001A

One (1) Total Suspended Solids (TSS) violation from the DMR for the period 8/1/88 to 10/31/88.

Monitoring Period	Discharge Parameter	Permit Limits	Reported Results
Discharge 001A 8/1 - 10/31/88	TSS(net)	110 kg/d (avg.)	196 kg/d

PART C FORMULA: \$4,500 x 1 violation = \$4,500

PART E

Discharge of Effluent in Excess of Permit Limitations  
N.J.A.C. 7:14-8.5

SERIOUSNESS: Pursuant to N.J.A.C. 7:14-8.5(e)3.ii(2) the seriousness factor is considered to be minor when a discharge violation has exceeded the effluent limitation set forth in the Permit by up to 50 percent for a non-hazardous pollutant. Since TSS is considered a non-hazardous pollutant and the Permit effluent limitation has been exceeded by up to 50 percent the seriousness factor is considered to be minor.

CONDUCT: Pursuant to N.J.A.C. 7:14-8.5(f)2, the conduct is considered to be moderate when actions taken by the violator are considered unintentional but foreseeable. Since CasChem consistently violated the effluent limitations set forth in its Permit, the conduct is moderate.

Pursuant to N.J.A.C. 7:14-8.5(d), the civil administrative penalty assessed for each violation is \$4,500.

Discharge 001A

One (1) TSS violation from DMR for the period 11/1/88 to 1/31/89.

Monitoring Period	Discharge Parameter	Permit Limits	Reported Results
Discharge 001A 11/1/88- 1/31/89	TSS(net)	110 kg/d (max.)	120 kg/d ✓

PART D FORMULA: \$4,500 x 1 violation = \$4,500

PART F

Discharge of Effluent in Excess of Permit Limitations  
N.J.A.C. 7:14-8.5

SERIOUSNESS: Pursuant to N.J.A.C. 7:14-8.5(e)3.i the seriousness factor is considered to be minor when a violation has occurred which is not considered major or moderate, and is not measured by concentration or mass. Since temperature is not measured by concentration or mass, the seriousness factor is considered to be minor.

CONDUCT: The Department does not currently have information in its possession that would support the firm conclusion that the violations are due to intentional, deliberate, purposeful, knowing, willing or foreseeable conduct on the part of the

violator. Therefore the conduct is minor.

Pursuant to N.J.A.C. 7:14-8.5(d), the civil administrative penalty assessed for each violation is \$1,750.

Discharge 001A

One (1) Temperature violation from the DMR for 11/1/87 to 1/31/88.

Monitoring Period	Discharge Parameter	Permit Limits	Reported Results
----------------------	------------------------	------------------	---------------------

Discharge 001A

11/1/87 -1/31/88	Temperature	11.10 degC (winter)	16 degC
------------------	-------------	---------------------	---------

PART E FORMULA: \$1,750 x 1 violation = \$1,750

TOTAL FINE:

\$ 175,000 (Part A)
60,000 (Part B)
15,000 (Part C)
4,500 (Part D)
4,500 (Part E)
+ 1,750 (Part F)
-----
\$ 260,750.00



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

August 22, 1990

Mr. Stuart Cooper, Manager  
Regulatory Affairs  
Cas Chem, Incorporated  
40 Avenue A  
Bayonne, NJ 07002

Re: Compliance Evaluation Inspection  
Cas Chem, Incorporated  
NJPDES No. NJ 0000949  
Bayonne/Hudson County

Dear Mr. Cooper:

A Compliance Evaluation Inspection of your facility was conducted by a representative of this Division on July 25, 1990. A copy of the completed inspection report form is enclosed for your information.

Your facility received a rating of "UNACCEPTABLE" due to the following deficiencies:

- 1) A review of the Discharge Monitoring Reports (DMRs) revealed that the facility exceeded the permit effluent limitations for Total Suspended Solids (TSS) for the period November 1, 1989 to January 31, 1990 at DSN 001.
- 2) A review of the DMRs revealed that the facility exceeded the permit effluent limit for winter effluent temperature for the period February 1, 1990 to April 30, 1990.
- 3) Sample containers for Total Organic Carbon and Total Suspended Solids are not being refrigerated during the compositing period as required by 40 CFR Part 136.
- 4) The facility operates four (4) 12,000 gallon tanks, which act as oil water separators with Treatment Works Approval (TWA). A TWA may be required for these tanks.

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BAK000016

TIERRA-B-016176

5) A licensed operator for supervision of the oil/water separators may be required.

The violations noted in Deficiency No. 1 is being addressed by the Administrative Order and Notice of Civil Administrative Penalty Assessment (AO/NACAPA issued by the Division to Cas Chem Corporation (Cas Chem) on May 18, 1990.

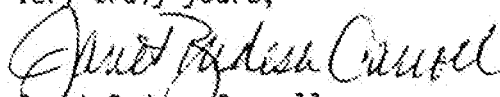
Deficiencies Nos. 2, 3, 4 and 5 noted above have placed your facility in significant violation of the terms and conditions of your NJPDES permit and/or the Water Pollution Control Act Regulations (N.J.A.C. 7:14A-1 et seq.). You are therefore DIRECTED to institute corrective measures. A written report concerning specific details of remedial measures to be instituted, as well as an implementation timetable, must be submitted to this Department and USEPA, Permits Administration Branch within thirty (30) calendar days of the date of this correspondence.

You are advised that the New Jersey Water Pollution Control Act (N.J.S.A. 58:10A-1 et seq.) provides for substantial monetary and criminal penalties in cases of permit violations.

Please direct all correspondence and inquiries to Kevin I. Marlowe, the Environmental Specialist responsible for this case, who can be reached at (201) 669-3900 or by letter through this Bureau.

Failure to fully comply with the above will result in the initiation of enforcement action by this Department. This shall in no way be construed, however, to indicate any exemption on your part from possible penalties for violations indicated by the Compliance Evaluation Inspection as stated above.

Very truly yours,



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

E22:G25

c: Chief - Permits Administration Branch, USEPA  
Mr. Patrick M. Durack, USEPA  
Ms. Jeanne Massavelli, Health Official

Enclosure

Let's protect our earth



**State of New Jersey**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**

METRO BUREAU OF REGIONAL ENFORCEMENT  
2 BABCOCK PLACE  
WEST ORANGE, NEW JERSEY 07052

(201) 669-3900

September 11, 1991

Mr. Seth Levine  
Director, Regulatory Affairs  
Cas Chem, Incorporated  
40 Avenue A  
Bayonne, NJ 07002

Re: Compliance Evaluation Inspection  
Cas Chem, Incorporated  
NJPDES No. 0000949  
Bayonne/Hudson County

Dear Mr. Levine:

A Compliance Evaluation Inspection of your facility was conducted by representatives of this Division on July 30, 1991. A copy of the completed inspection report form is enclosed for your information.

Your facility received a rating of "CONDITIONALLY ACCEPTABLE" due to the following deficiency:

The facility has very poor housekeeping practices.  
Such practices could lead to contamination of the  
State's waters.

The deficiency noted above is or may result in violations of the terms and conditions of your NJPDES permit and/or the rules and regulations of this Department. You are requested to institute corrective measures. A written report concerning specific details of remedial measures to be instituted, as well as an implementation timetable must be submitted to this Department and USEPA, Permits Administration Branch within 30 calendar days of the date of this correspondence.

*New Jersey is an Equal Opportunity Employer*

BAK000020

TIERRA-B-016178

Please direct all correspondence and inquiries to Kevin I. Marlowe, the Senior Environmental Specialist responsible for this case, who can be reached at (201)669-3900, or by letter through this Division.

Very truly yours,



Janet Budesca Carroll  
Acting Section Chief  
Surface Water/Sewer Extensions  
Metro Bureau of Water and Hazardous  
Waste Enforcement Field Operations

E38:G27

c: Chief, Permits Administration Branch, USEPA  
Mr. Patrick Durack, USEPA  
Ms. Jeanne Massavelli, H.O.  
Hudson Regional Health Commission

bc: Zaheer Hussain  
Central File  
Bureau of Industrial Discharge Permits  
*Metro*



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WATER RESOURCES  
CN 029, Trenton, N.J. 08625



DISCHARGE SURVEILLANCE REPORT

PERMIT # 0000949 NO. OF DISCHARGES 001 CLASS Major Incl.

DISCHARGER Cas Chem Corporation

OWNER Cas Chem Corporation, A division of Cambrex Corporation

MUNICIPALITY Bayonne COUNTY Hudson WATERSHED CODE N

LOCATION 40 Avenue A

RECEIVING WATERS Newark Bay STREAM CLASS TW-3

LICENSED OPERATOR & PLANT CLASS David Abbamonte (As of Feb. 1991 enrolled in N.J. license class) NS

TRAINEE/ASSISTANT \_\_\_\_\_ OTHER INFO. (201) 858-7802

DEFICIENCIES OR COMMENTS

*This facility has very poor housekeeping practices. Such practices could lead to contamination of the state's waters. The areas of concern in this regard are the wastewater treatment zone, the building where the air packing cleaning was conducted and finally where the Oil/Water Separators are held.*

OVERALL RATING     Acceptable     Conditionally Acceptable     Unacceptable

EVALUATOR Kevin Marlowe TITLE Environmental Specialist  
Sheila Games TITLE Environmental Specialist trainee

INFORMATION FURNISHED BY (Name) Seth Levine, P.E.

(Title) Director, Regulatory Affairs (Organization) Cas Chem

- Michael Portela - Environmental Coordinator

DATE OF INSPECTION July 30, 1991





DISCHARGE SURVEILLANCE REPORT

Permit #: 0000949  
Date: August 7

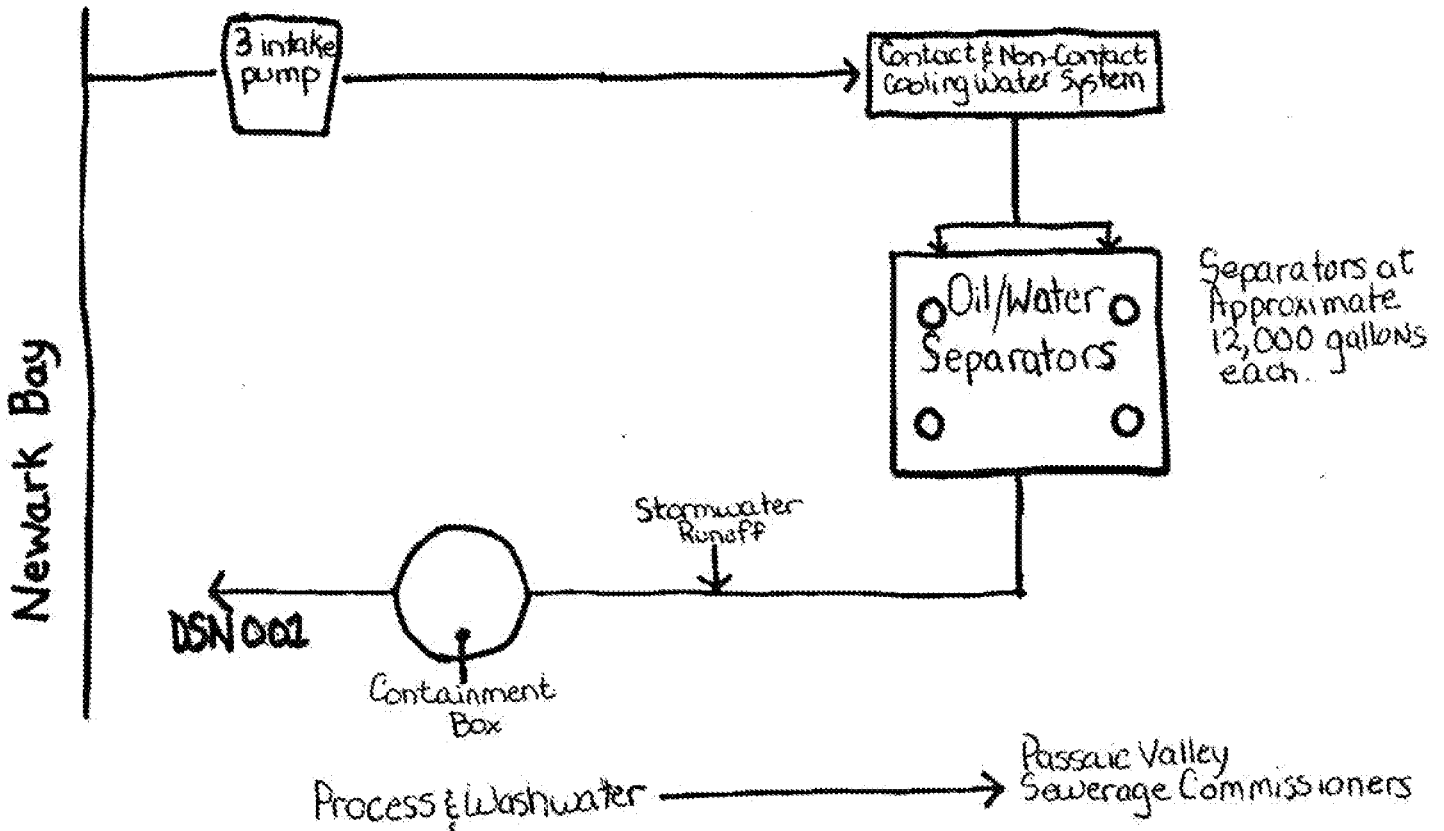
INDUSTRIAL TREATMENT PROCESS EVALUATION		
RATING CODES: S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable		
	RATING	COMMENTS
GENERAL	DISCHARGE # 001	--- Contact and Non contact Cooling Water
	WASTEWATER SOURCE(S)	--- on site water Purcell
	CONTINUITY OF OPERATION	--- 24hour/Day 7day/week Intermittent Discharge
	BYPASSES/OVERFLOWS	NA
	S.P.C.C. PLAN	S This plan was issued on July 13, 1991
	ALARM SYSTEMS	NA
	ALTERNATE POWER SUPPLY BMP	NA
TREATMENT PROCESSES	(4) 12,000 gallon oil/water separators	U Tankage in the basement of the No. 1 oil and refinery building acts as oil/water separators. The house keep in this area is poor. The area could lead to possible contamination of the state water.
SLUDGE HANDLING	Waste Solvents Waste Alcohol	--- Cas Chem Corporation Gen ID# NJB 067520890
	Transporter	--- OL Dover Corp VAD 040159439
	DISPOSAL SITE	--- OL Dover Corp VAD 040159439
INFORMATION	FLOW METER & RECORDER RECORDS	S flowmeter 3/5 Permit/DMR's
	SAMPLING PROCEDURES	Sigmatator - Company Personnel
	ANALYSES PERFORMED BY	S Tainley Research Laboratory Card # 20071
OTHER	Manufacture ester oil Derivatives	
	House Keeping	U Some staining of the ground was noted by tank 12 of the wastewater treatment area. This area in general was ill kept. Spill/Splash mark were evident surrounding the wastewater treatment area.
	FINAL EFFLUENT APPEARANCE	
	REC. WATERS APPEARANCE	--- Newark Bay



DISCHARGE SURVEILLANCE REPORT

Permit # 0000940  
Date July 30, 1991

PLANT DIAGRAM AND FLOW SEQUENCE:



DISCHARGE DATA

SOURCE: \_\_\_\_\_

PERIOD: May 1, 1990 - April 30, 1991

DIS	PARA	SAMPLE TYPE	PERMIT LIMITS	DATA	DIS	PARA	SAMPLE TYPE	PERMIT LIMITS	DATA
<i>No DMR violation at the time of inspection</i>									

MONITORING DEFICIENCIES: none at time of inspection

CasChem

RECEIVED  
39

STATE OF NEW JERSEY  
DEPT. ENVIRONMENTAL PROTECTION  
DIVISION WATER RESOURCES  
1000 26-1000 26-1000 26-1000

CasChem, Inc.  
40 Avenue A  
Bayonne, NJ 07002  
(201) 858-7900

February 11, 1991

NJDEP  
Division of Water Resources  
Bureau of Industrial Discharge Permits  
CN-029  
Trenton, N.J. 08625

Attn: Mr. John F. Fields, Acting Assistant Director, Wasterwater  
Facilities Management Element

RE: Comments on Draft NJPDES Permit NJ0000949

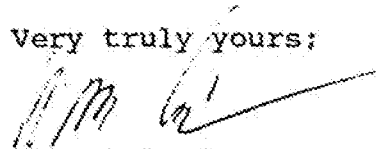
Dear Sir:

Further review of the Draft permit and our comments reveals that the non-contact cooling water from the drinking water supply (Bayonne Water Co.) that will be discharged to the Bay, will be from various pieces of production equipment, for example, pump seals, condensers, etc.

On page 6 of the Fact Sheet, it is apparent that where the water quality of our effluent was better than the bay water influent, rather than show the negative number which represents this, you chose to enter a value of zero. However, in the Oil and Grease Avg. Net column there are some discrepancies from our DMRs. The last four values should be 0.0, 1.5, -2.28, and -1.19 rather than the 1.0, 10.1, 3.73, and 1.0 shown. Interestingly though, the 2.4 column average agrees with these corrected values if the negative values are replaced with zeros.

We again repeat our request that the winter maximum temperature limitation be raised. Setting it at 20 degrees C would have a minimal effect on the Bay and would provide a larger differential cooling which may allow us to reduce the amount of cooling water being used.

Very truly yours;

  
Stuart B. Cooper  
Manager, Regulatory  
Affairs

Certified, Return Receipt Requested P269030708

cc: M. Leduc, Cambrex  
A. Eilender  
R. Matejek  
P. Thauer, Cambrex

State of New Jersey  
Department of Environmental Protection  
Division of Water Resources  
401 East State Street, CN-029  
Trenton, New Jersey 08625

FACT SHEET  
FOR DRAFT NJPDES PERMIT TO DISCHARGE  
INTO THE WATERS OF THE STATE OF NEW JERSEY

No. NJPDES NJ0000949

Date: November 6, 1989

Name and Address of Applicant: CasChem, Inc.  
40 Avenue A  
Bayonne  
New Jersey 07002

Name and Address of Facility : CasChem, Inc.  
where Discharge Occurs 35 Avenue A  
Bayonne  
New Jersey 07002

Receiving Water: Newark Bay

Classification: SE-3

I. DESCRIPTION OF FACILITY

The above named applicant has applied for a New Jersey Pollutant Discharge Elimination System (NJPDES) permit renewal, to the State of New Jersey Department of Environmental Protection, Division of Water Resources to continue discharge into the designated receiving water. A location map of the facility is included on page 3.

CasChem, Inc. currently produces approximately two hundred castor oil based specialty chemicals (SIC 2076, 2821 and 2869) which includes polymerized oils, dehydrated oils, fatty acids, etc. Water is drawn from the Newark Bay for use in jackets or coils of surface heat exchangers, pump seals, condensers etc., for noncontact cooling purposes and for water ejectors in the vacuum system where vapors may come in contact with the water used for creating vacuum. The facility discharges non-contact cooling water, vacuum system water (which first passes through 12,000 gallon oil/water separator tanks) and stormwater runoff through DSN 001. Additional city water (Bayonne Water Co.) will be used for noncontact cooling and pump seals in the newly modified wastewater treatment system discharging to the POTW. This noncontact cooling water will also be discharged through outfall DSN001.

## DMR SUMMARY

Fact Sheet

Page 6 of 10 pages

Permit No. NJ0000949

Revised 5/91

All units are in mg/l except flow which is in MGD

Date	Flow		TOC Avg	TOC Max	TSS Avg	TSS Max	Oil & Grease		Oil & Grease
	Avg	Max	Net	Net	Net	Net	Avg Net	Max Net	
11-01-86 to	1.117	1.124	-	-	4.0	8.0	13.0	39.0	
01-31-87									
02-01-87 to	1.0408	1.053	0.0	0.0	8.3	23.0	1.26	1.79	
04-3--87									
05-01-87	13.32	12.50	21.2	66.5	0.0	0.0	6.3	7.56	
07-31-87									
08-01-87 to	12.19	12.38	1.1	3.0	24.7	56.0	1.0	0.0	
10-31-87									
11-01-87 to	12.76	13.66	0.0	0.0	7.0	8.0	0.0	0.0	
01-31-88									
02-01-88 to									
04-30-88									
05-01-88 to									
07-31-88									
08-01-88 to	12.88	12.88	1.0	2.3	8.0	18.0	1.0	1.0	
10-31-88									
11-01-88 to	12.11	12.88	0.0	0.0	8.0	13.0	0.0	0.0	
01-31-89									
02-01-89 to	11.97	13.02	31.0	91.7	14.3	36.0	1.5	3.14	
04-30-89									
05-01-89 to	11.92	12.88	0.0	0.8	1.0	9.0	0.0	0.0	
07-31-89									
08-01-89 to	12.88	12.88	2.0	5.7	0.0	7.0	0.0	0.0	
10-31-89									
AVERAGE	12.02		5.6		7.5		2.4		
MAXIMUM		13.66		91.7		56.0		39.0	

**PRELIMINARY ASSESSMENT REPORT**

**CasChem Inc.**  
40 Avenue A  
Bayonne, New Jersey 07002

Prepared For:

**CasChem Inc.**  
c/o Cambrex Corporation  
661 Route 1 South  
North Brunswick, New Jersey 08902

Submitted To:

**New Jersey Department of Environmental Protection**  
Bureau of Environmental Evaluation, Cleanup and Responsibility Assessment  
401 East State Street, CN-028  
Trenton, New Jersey 08625

Prepared By:

**Earth Tech, Inc.**  
Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

Earth Tech Project No. 73343

June 2004

BAK00027

TIERRA-B-016186

**PRELIMINARY ASSESSMENT REPORT**

**CasChem Inc.**  
40 Avenue A  
Bayonne, New Jersey 07002

Prepared For:

**CasChem Inc.**  
c/o Cambrex Corporation  
661 Route 1 South  
North Brunswick, New Jersey 08902

Submitted To:

**New Jersey Department of Environmental Protection**  
Bureau of Environmental Evaluation, Cleanup and Responsibility Assessment  
401 East State Street, CN-028  
Trenton, New Jersey 08625

Prepared By:

**Earth Tech, Inc.**  
Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

Earth Tech Project No. 73343

June 2004

**New Jersey Department of Environmental Protection  
Site Remediation Program**

**PRELIMINARY ASSESSMENT REPORT**

This form has been created to assist in completing a Preliminary Assessment in accordance with the Technical Requirements for Site Remediation, N.J.A.C. 7:26E. It must be completed in detail and supplemented with narratives where directed. This form takes the Preliminary Assessment requirements of the Technical Rules and puts them into a question and answer format. It is the foundation for completing an environmental investigation of a site as a means towards obtaining a no-further-action approval from the Department ; as well as a means toward meeting the minimum requirements of the due diligence requirements of the innocent purchaser defense as defined by N.J.S.A. 58:10-23.11g

INFORMATION IN THE REPORT SHALL BE USED AS THE INITIAL BASIS FOR ASSESSING POTENTIAL ENVIRONMENTAL CONCERNS. THIS FORM MUST BE CERTIFIED IN ACCORDANCE WITH N.J.A.C. 7:26E-1.5. SUBMIT ONE ORIGINAL CERTIFIED COPY OF THIS FORM UNLESS IT IS ACCOMPANIED BY A SITE INVESTIGATION REPORT AND A PROPOSED REMEDIAL INVESTIGATION WORKPLAN IN WHICH CASE 3 COPIES SHALL BE SUBMITTED.

This form should be used as a foundation for completing a preliminary assessment report in accordance with N.J.A.C.7:26E, the Technical Requirements for Site Remediation, subchapter 3.1 and 3.2. The purpose of a preliminary assessment is to identify the presence of any potentially contaminated areas of concern. And if the information gathered to complete this form identifies and potentially contaminated areas of concern, then there is a need to complete a site investigation pursuant to N.J.A.C. 7:26E-3.3 through 3.13. If this is the case, then continue with the remedial activities and submit the preliminary assessment report with a complete site investigation report and a proposal based on the findings of the site investigation.

The Department will accept mimeograph copies or computer-generated copies of this form provided the copies are legible and all questions listed on this form are included.

The application must be notarized.

Should you encounter any problem in completing this form, we recommend that you discuss the matter with your assigned Case Manager for active cases or a representative from the Department if completing the form in anticipation of a future submittal to the NJDEP. Submitting incorrect or insufficient data may cause processing delays and possible postponement of your transaction.

Please call (609) 633-0708 or your assigned case manager between the hours of 8:30 a.m. and 4:30 p.m. to request assistance.



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 DIVISION OF RESPONSIBLE PARTY SITE REMEDIATION  
 P.O. Box 435, TRENTON, NJ 08625-0435

PRELIMINARY ASSESSMENT REPORT

Answer all questions. Should you encounter any problems in completing this form, we recommend that you discuss the matter with a representative from the Site Remediation Program. Submitting incorrect or insufficient data may cause processing delays and possible postponement of your transaction

PLEASE PRINT OR TYPE

Date: 04/20/2004

Industrial Establishment/Site Name CasChem, Inc.

Address 40 Avenue A

City or Town Bayonne Zip Code 07002

Municipality -- County Hudson

Block (s) 360, 361, 362 Lots (s) 1, 12, 3

Site Remediation Program Case Number or EPA Identification Number \_\_\_\_\_

1. Present a history of ownership and operations at the industrial establishment, in tabular form, from the time the site was naturally vegetated or utilized as farmland in accordance with N.J.A.C. 7:26E-3.1(c)1.i. (attach additional sheets as necessary)

Name of Owner/Operator	From	To
Barclay & Co., John O'Leary Contractor (Eastside block) and Oil Seeds Company (Bayside block)	Barclay & Co., John O'Leary Contractor - 1900	1910
	Oil Seeds Company - 1900	1910
F. W. Fitch Co. MFG Chemists (Eastside block) and Baker Castor Oil Company (Bayside block)	Baker Castor Oil Company - 1910	1975
	F. W. Fitch Co. - 1910	1915
Industrial Chemicals (Division of NL Industries, Inc.) - both blocks	1975	1981
CasChem Inc. - both blocks	1981	11/10/2003
Rutherford Chemicals LLC	11/10/2003	Present

2A. In accordance with N.J. A.C. 17:26E-3.1(c)1.ii, provide a clear and concise description of the past industrial/commercial operation(s) conducted onsite by each owner and operator. To the extent available the site history shall include an evaluation of the following sources of information:

- (1) Sanborn Fire Insurance Maps; (2) MacRae's Industrial Directory; (3) Title and Deed; (4) Site plans and facility as-built drawings; (5) federal, state, county and local government files; (6) The Department Geographic Information System; (7) and any additional sources which may be available for a specific site.

Site history is frequently an item where preliminary assessments are incomplete. The Industrial Site Recovery Act requires that a diligent inquiry be made, researching the site history back to January 1, 1932. Common answers to this question have included: "Unknown", or "We are only a tenant on the site and have no knowledge of prior site history". Neither of these answers satisfies the requirement for a due diligent inquiry.

To avoid having a PA found incomplete by the Department due to insufficient information, the site history must be researched. The following are ways of obtaining information regarding site history: title searches; contacting the local and county health officials and municipal agencies (for example, local fire and police departments, and local planning, zoning, adjustment boards) requesting any information these public agencies may have on the specific location; and, interviewing long time neighbors of the industrial establishment. Tenants should always request information from the landlord. The applicant should always document any attempts to locate this information to support a claim that a diligent inquiry has been conducted. If the prior site history demonstrates that the current building was built on vacant unimproved property, it should be reported as such. If the site has been, or is now the subject of a site remediation, any prior cases should always be referenced.

Provide the page or appendix number where the site history may be found. **Appendix I**

Provide a listing of the resources utilized to compile the site history and as appropriate copies of any maps or information, which will assist the Department in evaluating your conclusions.

Name of Resource	Date of document reviewed	Appendix # if providing copies
Tidelands -- aerial photographs	1932 - 2002	
Environmental Data Resources -- Sanborn Maps	1887 - 1995	1
Interviews of site personnel	February-March, 2004	
Environmental Data Resources -- Facility Report	February 11, 2004	
NETR Real Estate Research & Information -- Industrial Directory Search Report	February 25, 2004	1
The Baker Castor Oil Company, Middle States Eastern Underwriters Inspection Bureau Map, May 25, 1938	March 14, 2004	
The Baker Castor Oil Company, Base Map, 1944	March 24, 2004	
The Baker Castor Oil Company, Base Map, 1949	March 24, 2004	
CasChem, Plant Layout, November 15, 1982	March 24, 2004	
CasChem, Plant Layout, August 6, 1984	March 24, 2004	

2B. Include a detailed description of the most recent operations subject to this preliminary assessment. Provide the page or appendix # where the description of the most recent operations may be found. **Appendix 2**

3. Hazardous Substance/Waste Inventory: N.J.A.C. 7:26E-3.1(c)1.iii. List all raw materials, finished-products, formulations and hazardous substances, hazardous wastes, hazardous constituents and pollutants, including intermediates and by-products that are or were historically present on the site. Note: If past usage included farming, pesticides may be a concern and should be included in this list. (attach additional sheets if necessary).

The materials list is voluminous. Please refer to Appendix 3 for the identification and quantities of materials/substances used at the site.

Material Name	CAS # if known	Typical annual usage (gallons/lbs.)	Storage method (i.e. Drum, tank, jars)

- 4 A. In accordance with N.J.A.C. 7:26E-3.1(c)1iv, provide a summary of all current and historic wastewater discharges of **Sanitary and/or Industrial Waste** and/or sanitary sludges. Present and past production processes, including dates, and their respective water use shall be identified and evaluated, including ultimate and potential discharge and disposal points and how and where materials are or were received onsite. All discharge and disposal points shall be clearly depicted on a scaled site map.

Information required under this item is intended to identify potential discharges to any onsite disposal system, such as a septic system or lagoon or drywell. As an example, a facility that currently discharges sanitary and other wastes to the public sewer system, but maintained an onsite septic system prior to 1976, would complete this item as follows:

**EXAMPLE**

Discharge Period		Discharge Type	Discharge Location
From	To		
1977	Present	Sanitary/Industrial	Public Treatment Works
1960	1977	Sanitary/Industrial	Onsite Septic System
1955	1960	Sanitary	Onsite Septic System

**Site Information**

Discharge Period		Discharge Type	Discharge Location
From	To		
Early 1910s	Present	Sanitary	Public Treatment Works (POTW)
Early 1910s	1980	Industrial	POTW with preliminary onsite pH adjustment and lime addition
1980	Present	Industrial	Onsite Wastewater Treatment Plant Followed by POTW

- 4B. Provide a narrative of disposal processes for all historic and current process waste streams and disposal points (attach additional sheets if necessary)

Recyclable materials are segregated from other solid waste; cardboard is compacted and picked up.

Non-hazardous wastes (oil, oily water, oily debris, used filters, antifreeze, filter cake, etc.) are disposed off-site by the local waste hauler.

Solid waste is disposed off-site by local waste hauler.

Hazardous wastes are segregated, containerized and disposed off-site at permitted disposal facilities under RCRA permits. The facility was formerly a Large Quantity Generator of Hazardous Waste, but is now a Small Quantity Generator of Hazardous Waste.

Process wastewater is collected with oil separated, neutralized (pH-adjusted) and pre-treated as needed at the onsite Wastewater Treatment Plant (WTP) and discharged to the Passaic Valley Sewerage Commission (PVSC), the local POTW, under a permit.

5. This question requires the applicant to conduct a diligent inquiry into the current and historic operations at the site to identify all of the potential areas of concern, which formerly or currently exists at the industrial establishment as defined in N.J.A.C. 7:26E-1.8.

Diligent inquiry as defined in N.J.A.C. 7:26E-1.8 states:

A. Conducting a diligent search of all documents which are reasonably likely to contain information related to the object of the inquiry, which documents are in such person's possession, custody or control, or in the possession, custody or control of any other person from whom the person conducting the search has a legal right to obtain such documents; and

B. Making reasonable inquiries of current and former employees and agents whose duties include or included any responsibility for hazardous substances, hazardous wastes, hazardous constituents, or pollutants, and any other current and former employees or agents who may have knowledge or documents relevant to the inquiry.

In accordance with N.J.A.C. 7:26E3.1(c)1.v., a narrative shall be provided for each area of environmental concern describing the (A) Type; (B) Age; (C) Dimensions of each container/area; (D) Chemical Content; (E) Volume; (F) Construction materials; (G) Location; (H) Integrity (i.e., tank test reports, description of drum storage pad); and (I) Inventory control records, unless a Department-approved leak detection system, pursuant to N.J.A.C. 7:1E or 7:14B, has always been in place and there is no discharge history. If sampling is not proposed for any identified area of environmental concern, please explain why it is believed that the area of environmental concern does not contain contaminants above the applicable remediation standards. Submit all necessary documentation to verify this belief. The required narrative need not describe the sampling to be completed; however, it should state that sampling will be completed in accordance with the appropriate section of N.J.A.C. 7:26E. Detailed descriptions of all remediation activities shall be described in the site investigation report in accordance with N.J.A.C. 7:26E-3.13. Note: If the industrial establishment has multiple locations for one type of area of concern (example: underground storage tanks are located in 3 separate areas of the facility), each area must be discussed separately.

Please indicate if any of the potential areas of environmental concern listed below in #5A through #5G, as defined in N.J.A.C. 7:26E-1.8, formerly or currently exist at the industrial establishment by indicating Yes or No in the appropriate space as provided.

For the Location Reference Keyed to Site Map, use either a number or letter identification and be consistent throughout each phase of the remediation, referring to the same identification provided herein.

Provide the required narrative as an appendix to this report. Do not try to provide a narrative in the space provided.

I hereby certify that a diligent inquiry has been conducted to identify all current and historical potential areas of environmental concern and based on the diligent inquiry the areas of environmental concern identified below in question 5A through 5G are the only areas of environmental concern believed to exist at the above referenced industrial establishment.

**A. Bulk Storage Tanks and Appurtenances, including, without limitation:**

Area of Concern	Currently or Formerly Exists at the Site Yes/No	Location Referenced to the Site Map	Appendix Number
Aboveground Storage Tanks and Associated Piping	Yes	AOC-1	4
Underground Storage tanks and Associated Piping	Yes	AOC-2	5
Silos	Yes	AOC-3	6
Rail Cars	Yes	AOC-4	7
Loading and unloading areas	Yes	AOC-5	8
Piping, above ground and below ground pumping stations, sumps and pits	Yes	AOC 6 through AOC-8	9

**B. Storage and Staging Areas, including**

Area of Concern	Currently or Formerly Exists at the Site Yes/No	Location Referenced to the Site Map	Appendix Number
Storage pads including drum and/or waste storage	Yes	AOC-9 through AOC-11, AOC-14	10
Surface impoundments and lagoons	No	---	---
Dumpsters	Yes	AOC-12	10
Chemical storage cabinets or closets	Yes	AOC-13	10

**C. Drainage systems and areas including without limitation**

Area of Concern	Currently or Formerly Exists at the Site Yes/No	Location Referenced to the Site Map	Appendix Number
Floor drains, trenches and piping and sumps	Yes	AOC -15 through AOC-18	11
Process area sinks and piping which receive process waste	Yes	AOC-17-D	11
Roof leaders when process operations vent to the roof	Yes	AOC-19	11
Drainage swales & culverts	No	---	---
Storm sewer collection systems	Yes	AOC-21	
Storm water detention ponds and fire ponds	No	---	---
Surface water bodies	No	---	---
Septic systems leachfields or seepage pits	No	---	---
Drywells and sumps	Yes - Sumps	AOC-18	11
Underground rail car/scale	Yes	AOC-17-B	11

D. Discharge and disposal areas, including, without limitation:

Area of Concern	Currently or Formerly Exists at the Site Yes/No	Location Referenced to the Site Map	Appendix Number
Areas of discharge per N.J.A.C. 7:1E	Yes	AOC-17	11
Waste piles as defined by N.J.A.C. 7:26	No	---	---
Waste water collection systems including septic systems, seepage pits, & dry wells	Yes	AOC-17	11
Landfills or landfarms	No	---	---
Sprayfields	No	---	---
Incinerators	Yes	AOC-22	12
Historic Fill or any other Fill material	Yes	AOC-23	13
Open Pipe discharges	No	---	---

E. Other areas of concern, including, without limitation:

Area of Concern	Currently or Formerly Exists at the Site Yes/No	Location Referenced to the Site Map	Appendix Number
Electrical Transformers & Capacitors	Yes	AOC-24	14
Hazardous material storage or handling areas	Yes	AOC-25	15
Waste Treatment areas	Yes	AOC-26	16
Discolored or spill areas	Yes	AOC-27	17
Open areas away from production areas	No	---	---
Areas of stressed vegetation	No	---	---
Underground piping including industrial process sewers	Yes	Throughout building interior and across paved areas	11
Compressor vent discharges	Yes	AOC-28	18
Non-contact cooling water discharges	Yes	AOC-20	11
Areas which receive flood or storm water from potentially contaminated areas	Yes	AOC-21	11
Active or Inactive production wells	No	---	---

F. Building interior areas with a potential for discharge to the environment, including, without limitation:

Area of Concern	Currently or Formerly Exists at the Site Yes/No	Location Referenced to the Site Map	Appendix Number
Loading or Transfer areas	Yes	AOC-4	8
Waste Treatment areas	Yes	AOC-26	16
Boiler rooms	Yes	AOC-29	19
Air vents and ducts	Yes	AOC-30	20
Hazardous material storage or handling areas	Yes	AOC-25	15

**G. Any other site-specific area of concern.**

Area of Concern	Currently or Formerly Exists at the Site Yes/No	Location Referenced to the Site Map	Appendix Number
Metal Risers Outside Building 25	Yes	AOC-31	21

6. If the site area exceeds two acres, an interpretation of the aerial photographic history of the site shall be submitted in accordance with N.J.A.C. 7:26E-3.1(c)1.vi. The interpretation shall be based on available current and historical color, black and white and infrared aerial photographs (scale 1:18,000 or less) of the site and surrounding area at a frequency that provides the evaluator with a historical perspective of site activities. The photographic history shall date back to 1932 or the earliest photograph available. Aerial photographs are available for review at the New Jersey Department of Environmental Protection, Tidelands Management Program, Aerial Photo Library, 9 Ewing Street, Trenton, New Jersey, (609) 633-7369. Note, the applicant is not required to provide the Department with copies of the aerial photographs reviewed, only an interpretation of what was observed in each photograph, which may represent an environmental concern.

\_\_\_\_\_ Check here if an aerial photo review was not complete and provide a reason.

Provide the appendix number for the air photo review narratives: 22

7. Discharge History of Hazardous Substances and Wastes, N.J.A.C. 7:26E-3.1(c)1vii:

A. Have there been any known discharges of hazardous substances and wastes at the site?

\_\_\_\_\_ No (Go to question #8) X Yes (Complete Items 7B & 7C)

B. Was the Department notified of the discharge?

X Yes; \_\_\_\_\_ No (1) (2) (3) (7)

If yes, provide the Case # 90-12-21-1047 92-212-1010-01 92-5-15-1011-17 90-03-22-0825

C. Was a no-further-action letter, negative-declaration approval or full-compliance letter issued as a result of the cleanup of this discharge?

\_\_\_\_\_ Yes (Submit a copy of the no-further-action approval)

X No (Submit a complete Site Investigation or Remedial Action Report documenting the action taken to address the discharge) Appendix 23

8. In accordance with N.J.A.C.7:26E-3.1 (c) 1.vii, provide a description of any remediation activities previously conducted or currently underway at the site, including dates of discharges, remedial actions taken, and all existing sample results concerning contaminants which remain at the site. Copies of Department or other governmental agency no-further-action approvals should also be provided with a description of the areas to which the no-further-action approvals apply. This information is especially important if the approval was granted for the remediation of a portion of a site or a specific discharge event rather than the entire site subject to this preliminary assessment.

\_\_\_\_\_ Check here if this question does not apply.

Provide the appendix number for the required narrative and data summary 24

9. Protectiveness of past remedies, Order of Magnitude Analysis, N.J.A.C. 7:26E-3.1(c) 1.ix & N.J.A.C. 7:26E, 3.2(a)5

A. Have any areas of concern previously received a No-Further-Action approval from the Department or other equivalent government agency for which no additional remediation is proposed?  No (go to question #10).  Yes (complete 9B).

B. In accordance with N.J.S.A 58:10B-13(e) the following evaluation of the protectiveness of past remedies shall be completed for all areas of concern for which no further action was previously approved by the Department or other equivalent government agency and for which no additional remediation is proposed. All final sampling results shall be evaluated to determine if contaminant levels remaining onsite are in compliance with current remediation criteria. The applicant shall complete the following:

Include a table comparing the levels of contaminants remaining in each area of concern, the numerical remediation standard approved in the remedial action workplan or at the time of no-further-action approval and the numerical remediation standards applicable at the time of the comparison. The table shall contain all sampling results, including sample location, sample media, field and laboratory identification numbers, and method detection limits, as necessary, and analytical results for all individual contaminants for each area of concern. Table included in Appendix 24 - Remedial Action Activities Summary.

I hereby certify that the order of magnitude analysis required pursuant to N.J.A.C. 7:26E has been completed, since the issuance of a No-Further-Action approval, negative declaration approval or equivalent remediation approval; and (Check the appropriate statements (1), (2), (3) or (4))

(1)  The areas of concern listed below contain contaminants above the numerical remediation standard applicable at the time of the comparison, however no further action is required because: (check the appropriate sub statement)

(a) The contaminant concentrations remaining in the areas of concern listed below are less than an order of magnitude (factor of 10) greater than the numerical remediation standard applicable at the time of the comparison;

(b) The areas of concern or the site was remediated using engineering and institutional controls approved by the Department and these controls are still protective of public health, safety and the environment; or

(c) The area of concern or the site was remediated to an approved site specific remediation standard and all of the factors and assumptions which are the basis for deriving the site specific remediation standard remain valid for the site.

Please list the areas of concern for which the previous statement applies.

Area of Concern	Location Reference Keyed to the Site Map
Underground Storage Tanks	AOC-2-E and AOC-2-F



(2) \_\_\_\_ The areas of concern listed below contain contaminants above the numerical remediation standard applicable at the time of the comparison and further remediation is required because: (check the appropriate sub statement)

\_\_\_\_\_ (a) The contaminant concentrations remaining in the areas of concern listed below are more than an order of magnitude (factor of 10) greater than the numerical remediation standard applicable at the time of the comparison;

\_\_\_\_\_ (b) The areas of concern or the site was remediated using engineering and institutional controls approved by the Department and these controls are no longer protective of public health, safety and the environment; or

\_\_\_\_\_ (c) The area of concern or the site was remediated to an approved site specific remediation standard and some or all of the factors and assumptions which are the basis for deriving the site specific remediation standard are no longer valid;

Please list the areas of concern for which the previous statement applies.

Area of Concern	Location Reference Keyed to the Site Map

(3) \_\_\_\_ The areas of concern listed below do not contain contaminants above the numerical remediation standard applicable at the time of the comparison and no further remediation is required.

Please list the areas of concern for which the previous statement applies.

Area of Concern	Location Reference Keyed to the Site Map

(4) \_\_\_\_ The contaminant concentrations remaining in the below listed areas of concern are more than an order of magnitude greater than the numerical remediation standard applicable at the time of the comparison. However, no further remediation is required by the person conducting this preliminary assessment, because, in accordance with N.J.S.A. 58:10B13(e), that person is not liable for the contamination pursuant to N.J.S.A. 58:10-23.11g

Please list the areas of concern for which the previous statement applies.

Area of Concern	Location Reference Keyed to the Site Map

10. Historical Data on environmental quality at the Industrial Establishment.

A. Have any previous sampling results documenting environmental quality of the Industrial Establishment not received a no further action approval from the Department or been denied approval by the Department? (N.J.A.C. 7:26E-3.1(c)1.viii)

\_\_\_\_\_ Yes (See Attachment # \_\_\_\_\_)  No (Go to 11)

B. Have there been any known changes in site conditions or new information developed since completion of previous sampling or remediation? If sampling results were obtained, but are not part of this application, please explain below (N.J.A.C. 7:26E-3.1(x)): \_\_\_\_\_

11. List all federal, state and local environmental permits at this facility, including permits for all previous and current owners or operators, applied for, received, or both (Attach additional sheets if necessary).

Check here if no permits are involved \_\_\_\_\_

A. New Jersey Air Pollution Control

Permit Number	Expiration Date	Type of Permitted Unit
109114	9/22/1998	WAX BAGGING DUST COLL. BUILDING # 41
070226	5/27/2000	BLOWNOIL INCINERATOR BUILDING # 26
013678	1/14/2001	BOILER # 2
018246	1/14/1996	DOWTHERM BUILDING # 38 - WASH KETTLE # 3
034277	7/5/1997	TANK # 125
045087	2/27/1990	NITROGEN PRESSURE TANK # 51010
046690	8/10/2000	TANK # 329
046691	8/10/2000	STORAGE TANK # 327
046692	9/29/2000	TANK # 328
046590	3/21/1997	WASH TANK # 3, BUILDING # 38
047363	10/17/2000	STORAGE TANK # 330, BUILDING # P-6A
047364	10/17/2000	STORAGE TANK # 331, BUILDING # P-6A
047365	10/17/2000	STORAGE TANK # 332, BUILDING # P-6A
047784	11/21/2000	CASTOR OIL FILTER PRESS, BUILDING # 41
048506	1/31/2001	# 1 BOILER
061587	6/22/1997	TANK # 203
061473	6/22/1997	TANK # 222
061474	6/22/1997	TANK # 230
061588	6/22/1997	TANK # 124
061589	6/22/1997	TANK # 143
061590	6/22/1997	TANK # 144
061591	6/22/1997	TANK # 211
061476	6/22/1997	TANK # 214
061477	6/22/1997	TANK # 215
061478	6/22/1997	TANK # 218
061479	6/22/1997	TANK # 219
061480	6/22/1997	TANK # 220
061481	6/22/1997	TANK # 221
061482	6/22/1997	TANK # 225
061483	6/22/1997	TANK # 226

Permit Number	Expiration Date	Type of Permitted Unit
081484	6/22/1997	TANK # 228
088195	5/31/2000	WAX SEPARATOR HOOD BUILDING #41
067633	2/8/1999	BOILER # 3 STACK
071817	3/16/2000	THERMAL FLUID HEATER - HORS
108481	8/14/1998	AIRSTRIPPER 1
099079	8/1/1998	T-12
102133	9/13/1998	C-401 & 402 VENT. BUILDING # 25
109035	8/30/1999	C-201
119380	5/4/2000	C - HOT SYSTEM BATCH PLANT
105570	6/4/2002	DOWTHERM 7500 BATCH PERMIT
112534	4/27/1997	V-WTI-B38
112535	4/27/1997	P6A - 301 STORAGE TANK
107179	6/16/1997	T - 139
107180	9/17/1998	V-B38-RF1
107274	6/30/1997	T-140
109591	5/4/2003	C-701 SYSTEM BATCH PLANT (COSMETIC REACTOR)
117461	5/4/2003	FILTER PRESS A, B, C & D
109264	10/13/1997	T-227
109401	7/12/1998	C-102 SYSTEM BATCH PLANT (DOWTHERM DRYERS)
109592	5/4/2003	C-301 SYSTEM BATCH PLANT (Wax #2)
110297	9/5/1998	TK# 287
110298	9/5/1998	TK # 224
110299	9/5/1998	TK # 213
110300	9/5/1998	TK # 3Y
110301	9/5/1998	TK # 2Y
110302	9/5/1998	TK # 1Y
110303	9/5/1998	TK # E1
110304	9/5/1998	TK # D-1
110305	9/5/1998	TK # C-1
110306	9/5/1998	TK # B-1
110307	9/5/1998	TK # 202
110380	9/13/1998	TK # 191
110469	9/13/1998	TK # 198
110470	9/13/1998	TK # 207
110471	9/13/1998	TK # 193
110472	9/13/1998	TK # 192
110473	12/28/1997	TK # 217
110474	12/28/1997	TK # 210
110475	12/28/1997	TK # 209
110476	12/28/1997	TK # 212
110477	12/28/1997	TK # 231
111113	2/8/1998	TK # 340
113524	5/4/2003	D & E V-01
113525	5/4/2003	D & E V-02
113909	5/4/2003	CAN-V-01
113910	5/4/2003	CAN-V-02
113911	5/4/2003	CAN-V-03
113777	5/4/2003	PILOT PLANT DUAL PERMANENT
115083	11/9/1998	T # 223
115854	2/22/1999	BUILDING # 9-DRUM STATION 1
115855	2/22/1999	BUILDING # 9-DRUM STATION 2
116852	5/4/2003	FDA ROOM - STATION
116853	5/4/2003	BLD. 24 - DRUM STATION

Permit Number	Exp. Jon Date	Type of Permitted Unit
116854	5/4/1999	LAB - R&D
116855	5/4/1999	LAB-QC
117022	5/4/2003 (?)	FAN 38A
119035	5/4/2003 (?)	SADDLE - 1
120559	5/4/2003 (?)	URETHANE
120696	2/7/2000	T # 67
120697	2/7/2000	T # 75
120698	2/7/2000	T # 68
120699	2/7/2000	T # 11
120700	2/7/2000	T # 69
120701	2/7/2000	T # 77
121397	5/4/2003	FAN 28 - H.O. DUCT WORK
121398	3/21/2000	WELDING SHOP
128659	11/26/2001	STORAGE TANK 41/51
PCP980006	1/4/2004	TANK # 299 (NEW T-804)
PCP980007	1/4/2004	TANK # 195 (NEW T-808)
PCP980008	1/4/2004	TANK # 204 (NEW T-809)
PCP980009	1/4/2004	TANK # 298 (NEW T-820)
PCP980010	12/24/2003	TANK # 300 (NEW T-822)
PCP980011	12/24/2003	TANK # 194 (NEW T-819)
PCP980012	12/24/2003	TANK # 199 (NEW T-823)
PCP980013	12/24/2003	TANK # 200
PCP980014	12/24/2003	TANK # 201
PCP980005	12/22/2003	FLUID BED DRYER
PCP980004	12/30/2003	DISTILLATION COLUMN
PCP980002	1/4/2004	TANK # V-819
PCP980003	12/22/2003	R-805 (CRYSTALLIZATION TANK)
PCP980001	1/4/2004	TANK # T812
PCP980015	12/22/2003	REACTOR (CATALYTIC OXIDIZER)
PCP980016	12/22/2003	QUENCH TANK
GEN990001	3/9/2004	THERMAL OIL SYSTEM (BOILER (B-B3))

B. Underground Storage Tank Registration Number 0004475

Size of Tank (Gallons)	Tank Contents
Two 550	Formerly Gasoline (Tanks were removed in 1983)
One 550	Formerly Gasoline (Tank was abandoned in-place in 1991)
One 110	Formerly Gasoline (Tank was abandoned in-place in 1991)
Two 6,000	Formerly Toluene (Tanks were abandoned in-place in 1984)
Two 550	Formerly Waste Xylene and Urethane Waste (Tanks were abandoned in-place in 1984)
6,000	Formerly Waste Xylene and Urethane Waste (Tank was abandoned in-place in 1984)
15,000	Formerly Heptane (Tank was abandoned in-place in 1985)
Two 6,000	Formerly Xylene (Tanks were abandoned in-place in 1985)
Two 6,000	Formerly Naphtha (Tanks were abandoned in-place in 1985)
10,000 (rail car)	Formerly Fuel Oil (Tank was abandoned in-place in 1985)
1,000	Formerly Fuel Oil (Tank was removed in 1985)
10,000 (rail car)	Formerly Dioctyl Adipate/Fuel Oil (Tank was abandoned in-place in 1985)
1,000	Formerly Steam Condensate (Tank was abandoned in-place in 1985)
Six 2,500 (volume is estimated)	Formerly Alcohols

C. New Jersey Pollutant Discharge Elimination System (NJPDES) Permit

Permit Number	Discharge Type	Discharge Location Keyed to Site map	Expiration Date
NJ0000949	Surface Water		06/30/2008
NJG013423	Stormwater		05/31/2007

D. Resource Conservation and Recovery Act (RCRA) permit Number: NJD067520890

E. EPA Identification Number: NJD054126164

F. In accordance with N.J.A.C. 7:26E-3.1(c) xii, list all other federal, state, local government environmental permits for all previous and current owners or operators applied for and/or received for the site including:

- (1) Name and address of the permitting agency
- (2) The reason for the permit
- (3) The permit identification number
- (4) The application date
- (5) The date of approval, denial or status of the application
- (6) The name and current address of the permittees
- (7) The reason for the denial, revocation or suspension if applicable
- (8) The permit expiration date

\_\_\_\_\_ Check here if no other environmental permits were applied for or received for this site.

Provide the appendix # for the required listing if other environmental permits exist for this site 25.

12. In accordance with N.J.A.C. 7:26E-3.1(c)xiii, provide a summary of enforcement actions (including but not limited to, Notice of Violations, Court Orders, official notices or directives) for violations of environmental laws or regulations (attach additional sheets if necessary):

Please refer to Appendix 26 for a summary of enforcement actions.

A. Check here if no enforcement actions are involved \_\_\_\_\_ (Go to 13 otherwise complete 12B)

B. (1) Name and address of agency that initiated the enforcement action

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(2) Date of the enforcement action \_\_\_\_\_

(3) Section of statute, rule or permit allegedly violated \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(4) Type of enforcer: \_\_\_\_\_

(5) Description of the violation \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(6) How was the violation resolved? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. In accordance with N.J.A.C. 7:26E-3.1(c) xiv, please provide a narrative description of all areas where non-indigenous fill materials were used to replace soil or raise the topographic elevation of the site, including the dates of emplacement.
14. A. In accordance with N.J.A.C. 7:26E-3.2(a) 3.i, submit a scaled site plan, detailing the subject lot and block, property and or leasehold boundaries, location of current and former buildings, fill areas, paved and unpaved areas, vegetated areas, and all areas of concern identified above and all active or inactive wells.
- B. Scaled historical site maps and facility as built drawings (if available).
- C. A copy of the United States Geologic Survey (USGS) 7.5 minute topographical quadrangle that includes the site and an area of at least one mile radius around the site. The facility location shall be clearly noted. If a portion of the USGS quadrangle is used, the scale, north arrow, contour interval, longitude and latitude with the name and date of the USGS quadrangle shall be noted on the map.
15. In accordance with N.J.A.C. 7:26E-3.2, please provide the date that the site visit was completed to verify the findings of the preliminary assessment. 03/04/2004 and 03/19/2004
16. List any other information you are submitting or which has been formerly requested by the Department:

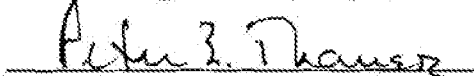
Description	Appendix #

**CERTIFICATION:**

The following certification shall be signed by the highest-ranking individual at the site with overall responsibility for that site or activity. Where there is no individual at the site with overall responsibility for that site or activity, this certification shall be signed by the individual having responsibility for the overall operation of the site or activity.

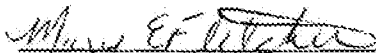
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, and based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information, and that I am committing a crime of the fourth degree if I make a written false statement, which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Typed/Printed Name: Peter E. Thauer Title: Vice President, CasChem, Inc.

Signature:  Date: June 2, 2004

Sworn to and Subscribed Before Me on this 2nd

Day of June 2004

  
Attorney at Law  
State of New Jersey

Division of Responsible Party Site Remediation  
Industrial Site Recovery Act

INITIAL NOTICE FEE SUBMITTAL FORM

Case # (if known) \_\_\_\_\_

Case Name (Active Case) CasChem Inc.

Check drawn from the account of Cambrex Corporation

Check/M.O. # 005783

Amount Enclosed \$250.00

Please circle the appropriate payment location(s)

1.	General Information Notice	\$100.00
2.	Preliminary Assessment Report	<input checked="" type="checkbox"/> \$250.00
3.	Site Investigation Report	\$500.00
4.	Negative Declaration Review	\$100.00
5.	Expedited Review Application•	\$250.00
6.	Remediation in Progress Waiver Application•	\$250.00
7.	Regulated Underground Storage Tank Waiver Application•	\$500.00
8.	Area of Concern Waiver Application•	\$200.00
9.	Limited Site Review Application•	\$450.00
10.	Applicability Determination Application	\$200.00
11.	De minimis Quantity Exemption Application	\$200.00
12.	Limited Conveyance Application•	\$500.00
13.	Remediation Agreement Application	\$1000.00
	Remediation Agreement Amendment Application	\$500.00
14.	Confidentiality Claim	\$250.00
15.	Remedial Action Workplan Deferral Application•	\$750.00

- This fee includes the costs of the Department's review of the General Information Notice required pursuant to N.J.A.C. 7:26B-3.2(a). Any person submitting this fee shall not be required to submit a separate General Information Notice fee.

Note: All applicable fees are due with the submission of each document. A case will remain with the Initial Notice Section up through the submission of a Remedial Investigation Report or the submission of a schedule to implement a Remedial Investigation or Remedial Action at Peril.



## LIST OF APPENDICES

1. Site History
2. Current Site Operations
3. Hazardous Substance/Waste Inventory
4. Aboveground Storage Tanks
5. Underground Storage Tanks
6. Silos
7. Rail Cars
8. Loading and Unloading Areas
9. Bulk Storage Tanks - Piping, Pumping Stations, Sumps and Pits
10. Storage and Staging Areas
11. Drainage Systems
12. Incinerators
13. Historic Fill
14. Electrical Transformers
15. Hazardous Material Storage and Handling Areas
16. Waste Treatment Areas
17. Discolored Or Spilled Areas
18. Compressor Discharges
19. Boiler Rooms
20. Air Vents and Duct
21. Metal Risers Outside Building 28
22. Aerial Photographs Review
23. Spill Report Summaries
24. Remedial Action Activities Summary
25. Additional Environmental Permits Table
26. Enforcement Actions Summary Table
27. Figures
28. Photographs



*A Tyco Infrastructure Services Company*

**APPENDIX 1**  
**SITE HISTORY**



*A Tyco Infrastructure Services Company*

CasChem, Inc., the previous owner of the facility located at 40 Avenue A, Bayonne, New Jersey, is the entity responsible for completion of remediation required under the New Jersey Industrial Site Recovery Act, and is hereinafter referred to in this Preliminary Assessment Report as "CasChem" the entity responsible for conducting site remediation.

Information regarding the site historical development and use has been obtained from the following sources:

- Interviews Of Facility Personnel;
- Review of the Environmental Data Resources, Inc. (EDR) Sanborn Company (Sanborn) repository. The Sanborn maps available for review were dated 1887, 1898, 1912, 1950, 1979, 1988, 1991, 1994, and 1995. Because the print on the maps was unclear, only general observations and conclusions could be made; and
- Review of NETR Real Estate Research & Information Industrial Directory Search Report, dated February 25, 2004.
- Review of the May 25, 1938 Historical Map (Source: Middle States Eastern Underwriters Inspection Bureau).
- Review of Facility Site Plans, dated 1944, 1949, 1982 and 1984.

Based upon interviews and review of the aforementioned records, prior to 1912, the western block of the site adjacent to Newark Bay (i.e., the Bayside block) was principally vacant, with a few small structures of residential nature present. The Eastside block of the property (east of Avenue A) was subdivided into individual rectangular strips of land of the same size; however, no structures were observed.

During the early 1920s, the southern half of the Eastside block was occupied by Barclay & Co., identified as a "manufacturer of proprietary medicine". Buildings present at this block were used for offices, packing and shipping, wrapping, laboratory operations, and some milling operations. The northern half of the Eastside block was occupied by John O'Leary, Contractor and was used for storage of building materials as well as housing two residential buildings. The Bayside block was occupied by Oil Seeds Company, a manufacturer of coconut oil. The property adjacent to the south border of the Oil Seeds Company was occupied by S.W. Bonsall, Saw and Veneer Mills and included two main buildings, identified as a saw mill and veneer mill, respectively. The adjacent property to the north of the Oil Seeds Company was vacant, with several residence-type structures present.



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During the World War II period and into the early 1950s, the southern half of the Eastside block was occupied by F. W. Fitch Manufacturing Co. The structures present on this block included shipping and packaging building, a boiler room, and a large manufacturing building. One of the areas inside the manufacturing building was identified as "alcohol and oil storage". An overall orientation and layout of the buildings generally corresponded to the buildings currently occupying this block. The northern half of the Eastside block was occupied by Baker Castor Oil Co. and the entire Bayside block were occupied by Baker Castor Oil Co. A series of large and smaller circular tanks were present throughout this block; some of these tanks were labeled as "oil tanks", while the other tanks were either labeled as "bean oil" or were unlabeled as to their contents. The Bayside block appeared more developed than in the early 1910s.

Three 8-inch diameter underground lines were shown only on a 1949 map as traversing the Bayside Block from the location of the current cooling tower southward beneath Building 38A; these lines were shown as being owned by Texas Company and the contents were not identified. Because these lines were not related to CasChem site operations, and the northern and southern portions of the property in this area are already being investigated (see Appendix 7-AOC-4: Rail Cars and Appendix 15-AOC-25B: Historical Buildings), these lines were not considered to represent an area of concern with regard to this PA.

From the time when Baker Castor Oil Co. commenced their occupancy and operation at the site, to the present time, the property has been used exclusively for manufacturing, refinery, storage and distribution of castor beans or castor oil. As early as approximately the mid-1960s, the facility discontinued production of castor oil and the activities conducted onsite consisted solely of processing and purification of castor oil received from off-site. From the early 1940s and to the present, the principal operations conducted at the site, and waste disposal practices, did not change significantly, except for dikes and secondary containment that were constructed around hazardous chemical and oil storage tanks/vessels in the early 1990s. In addition, a series of underground storage tanks (USTs) were closed at the property in the mid-1980s. The UST removal and other items specific to facility operations are discussed in the other attachments to this PA Report.



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Sanborn Maps



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30


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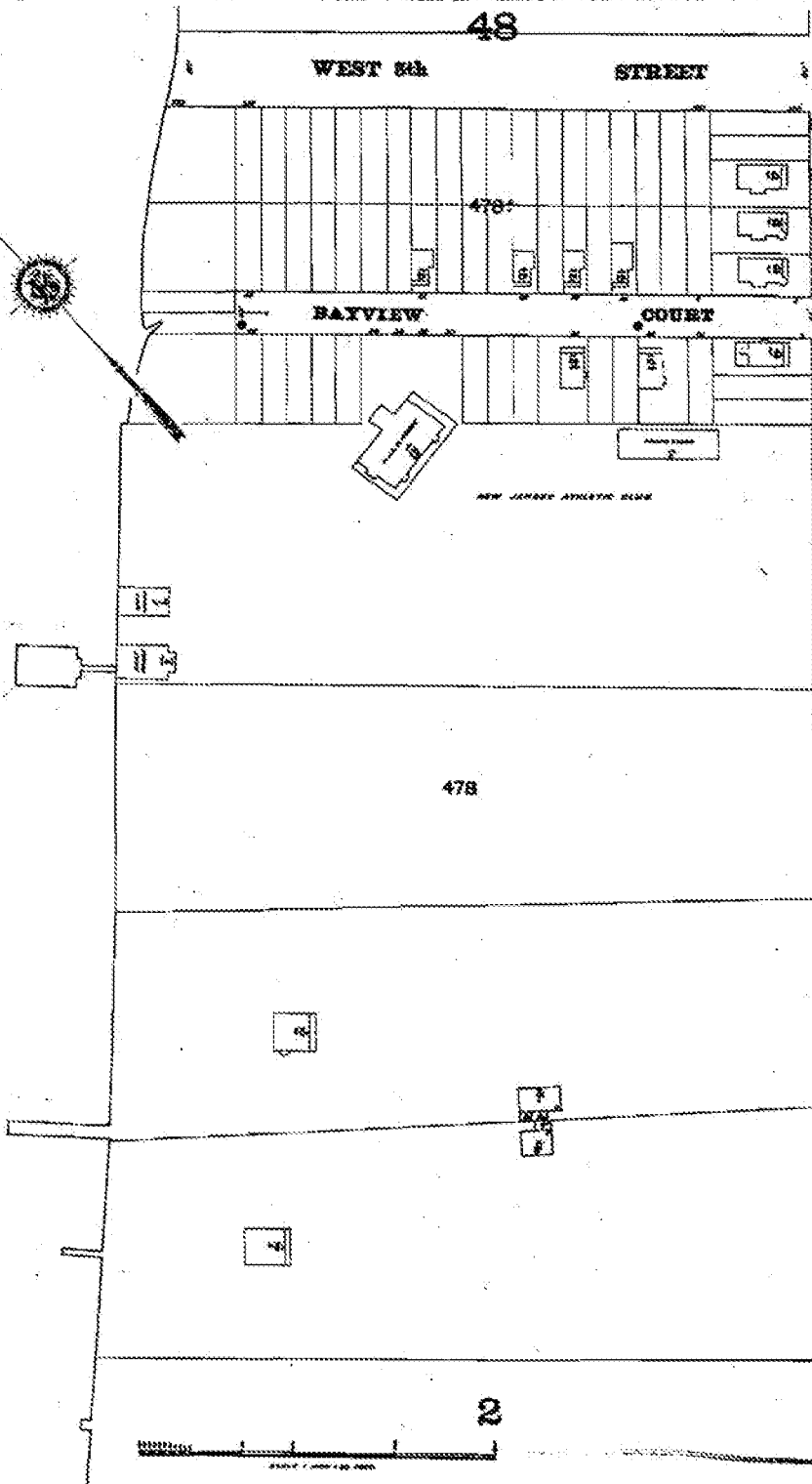
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48

WEST 48th STREET

BAYVIEW COURT

NEW JERSEY ATHLETIC CLUB

478

MARGARET STREET

4  
W 4th ST.

JULIETTE STREET

AVENUE

W 2d ST.

GERTRUDE STREET

28





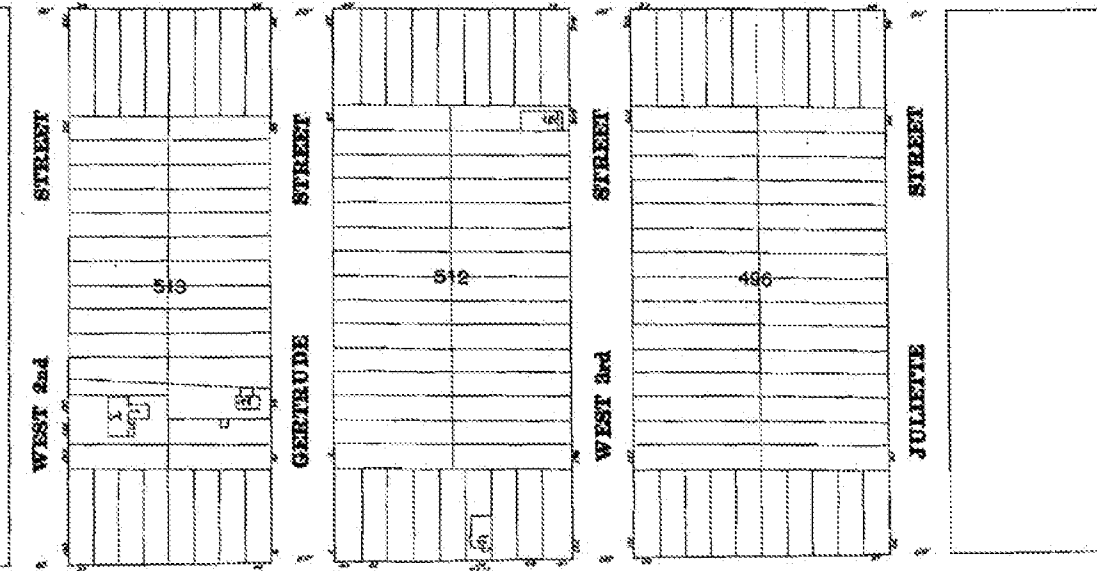


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AVENUE

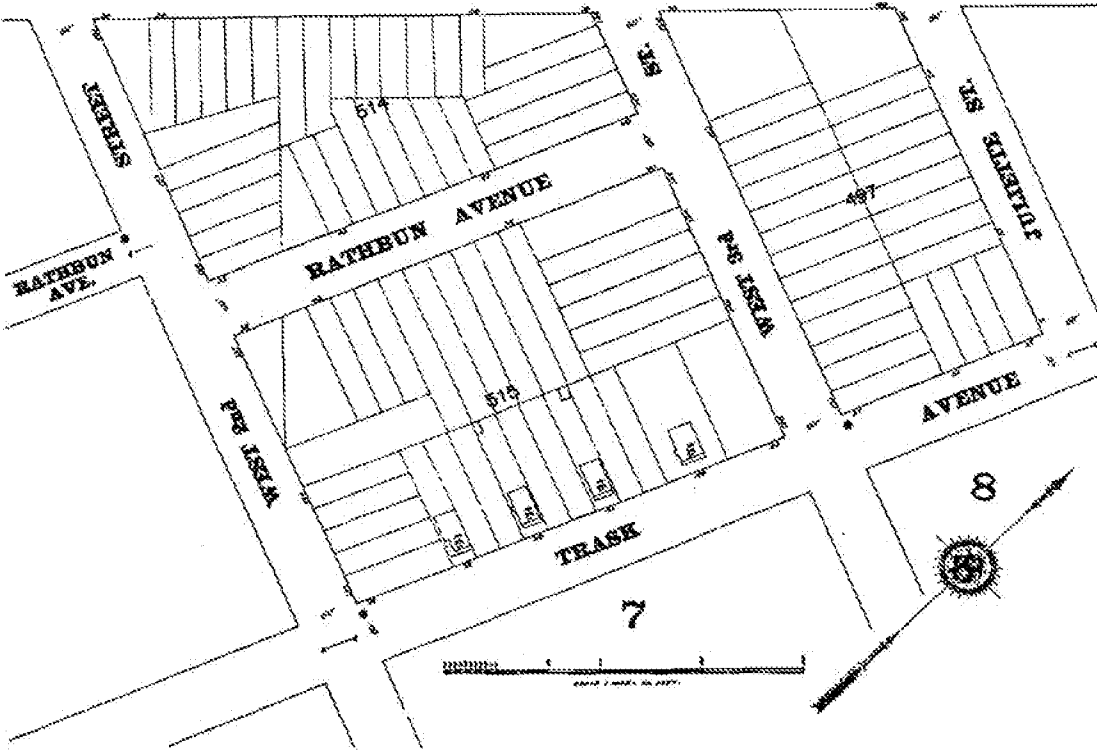


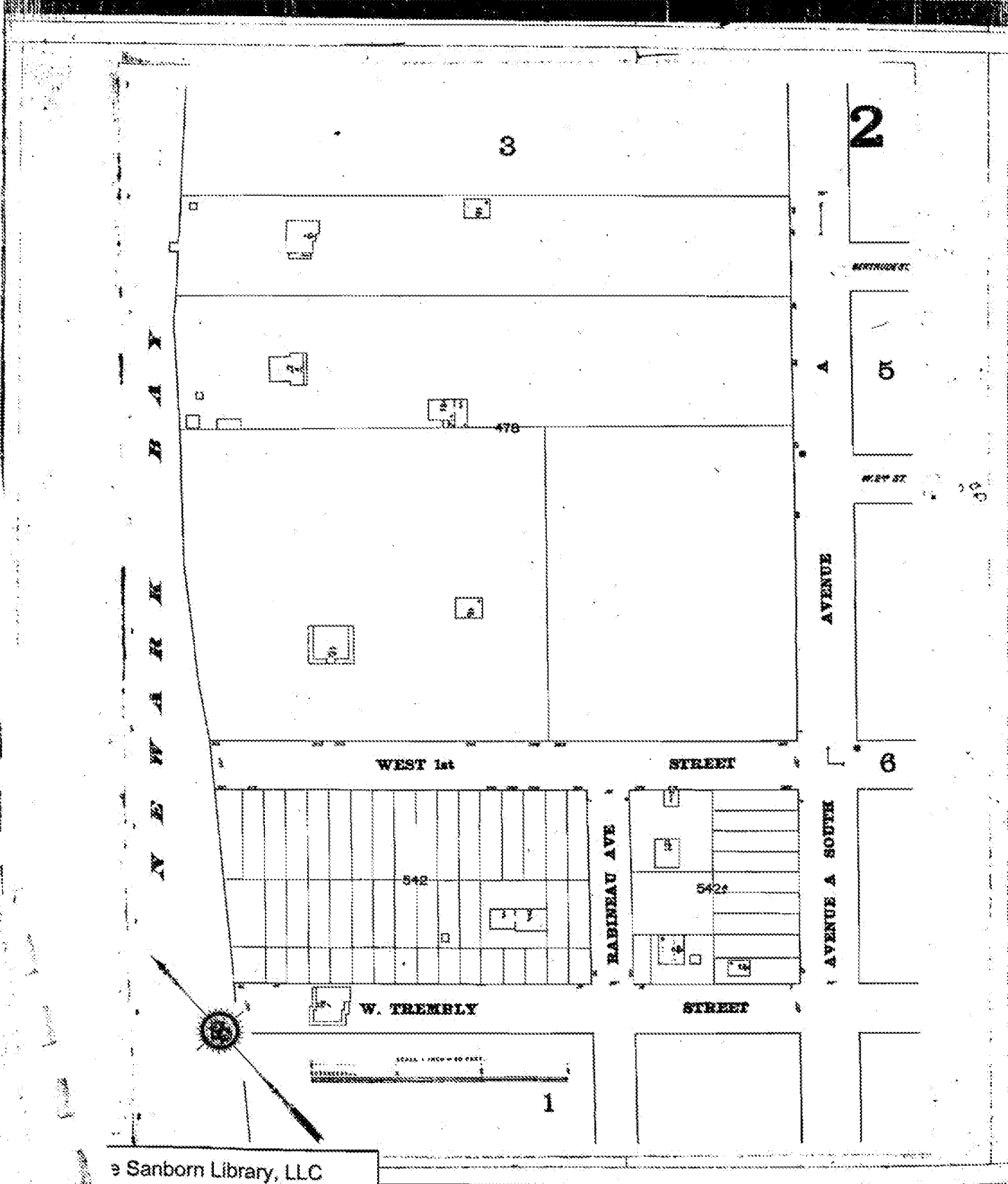
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HUDSON

BOULEVARD

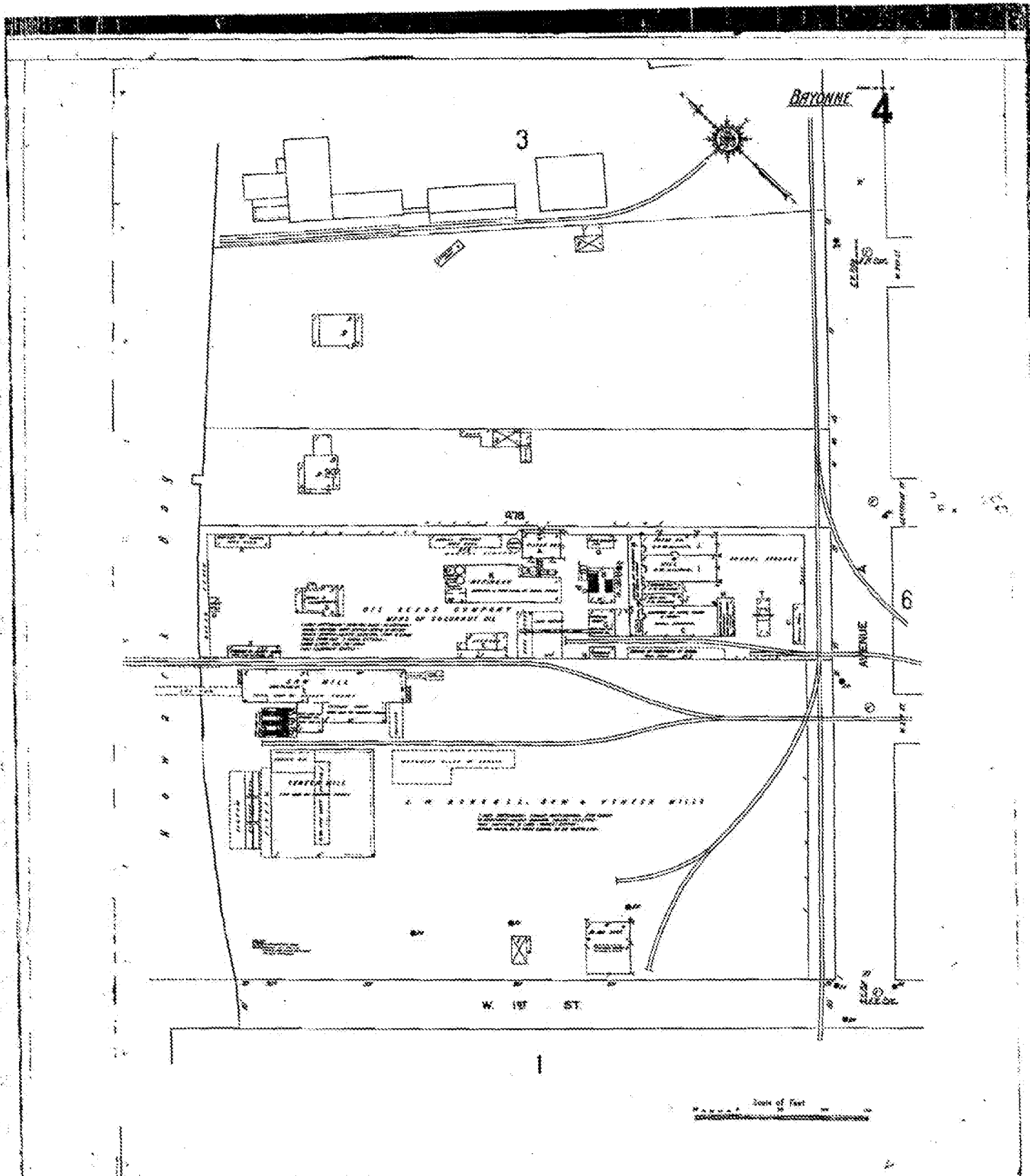
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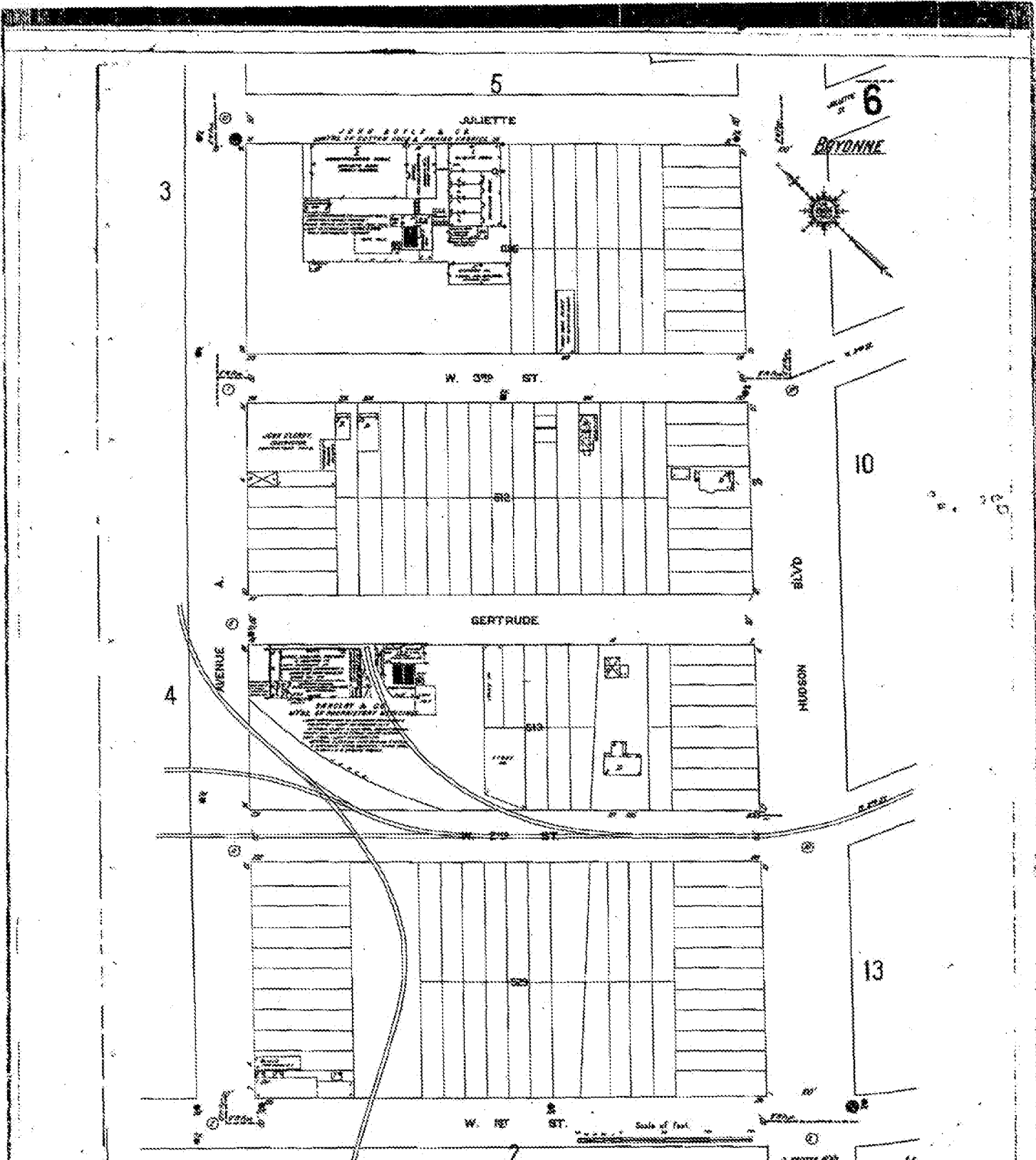



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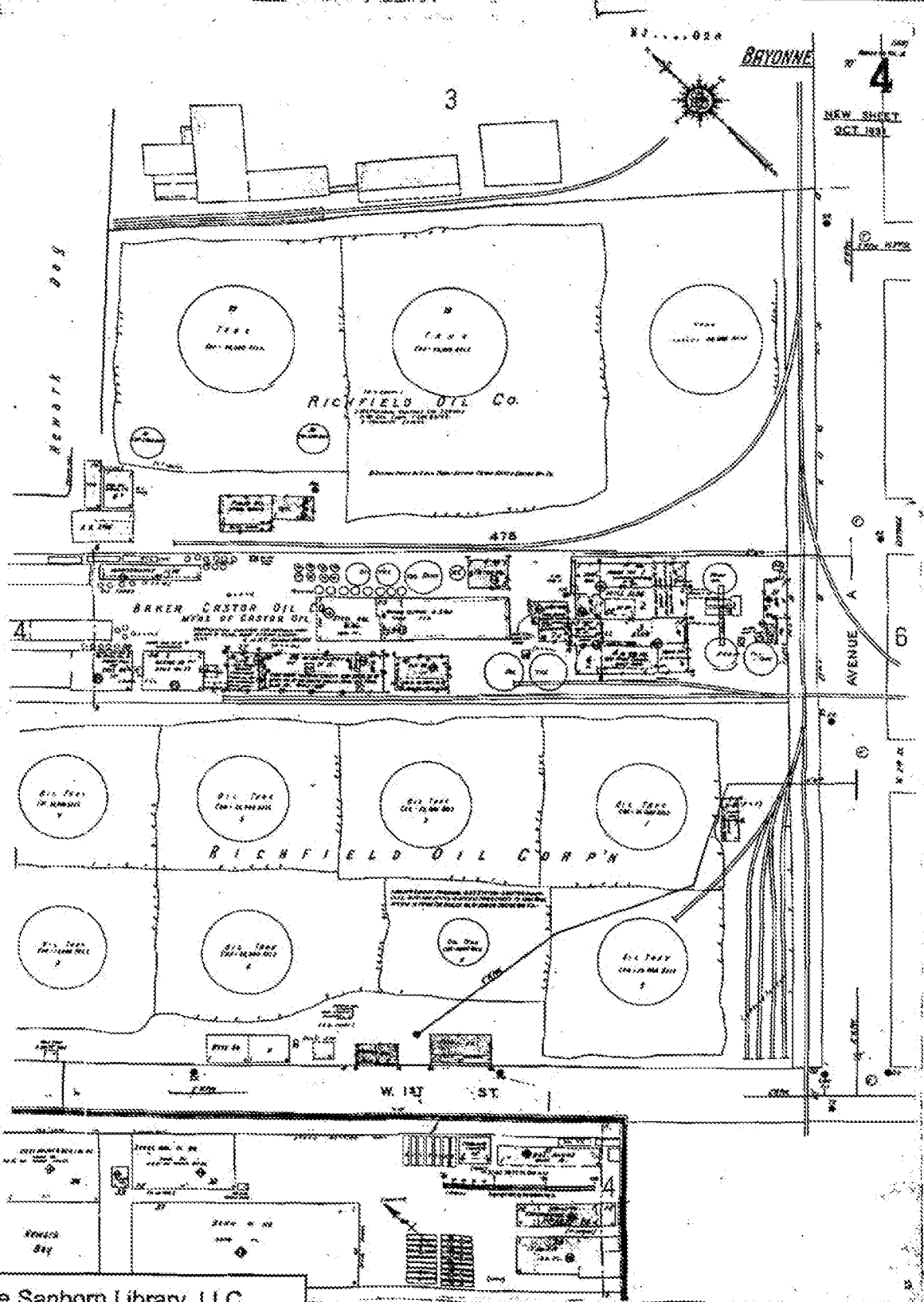
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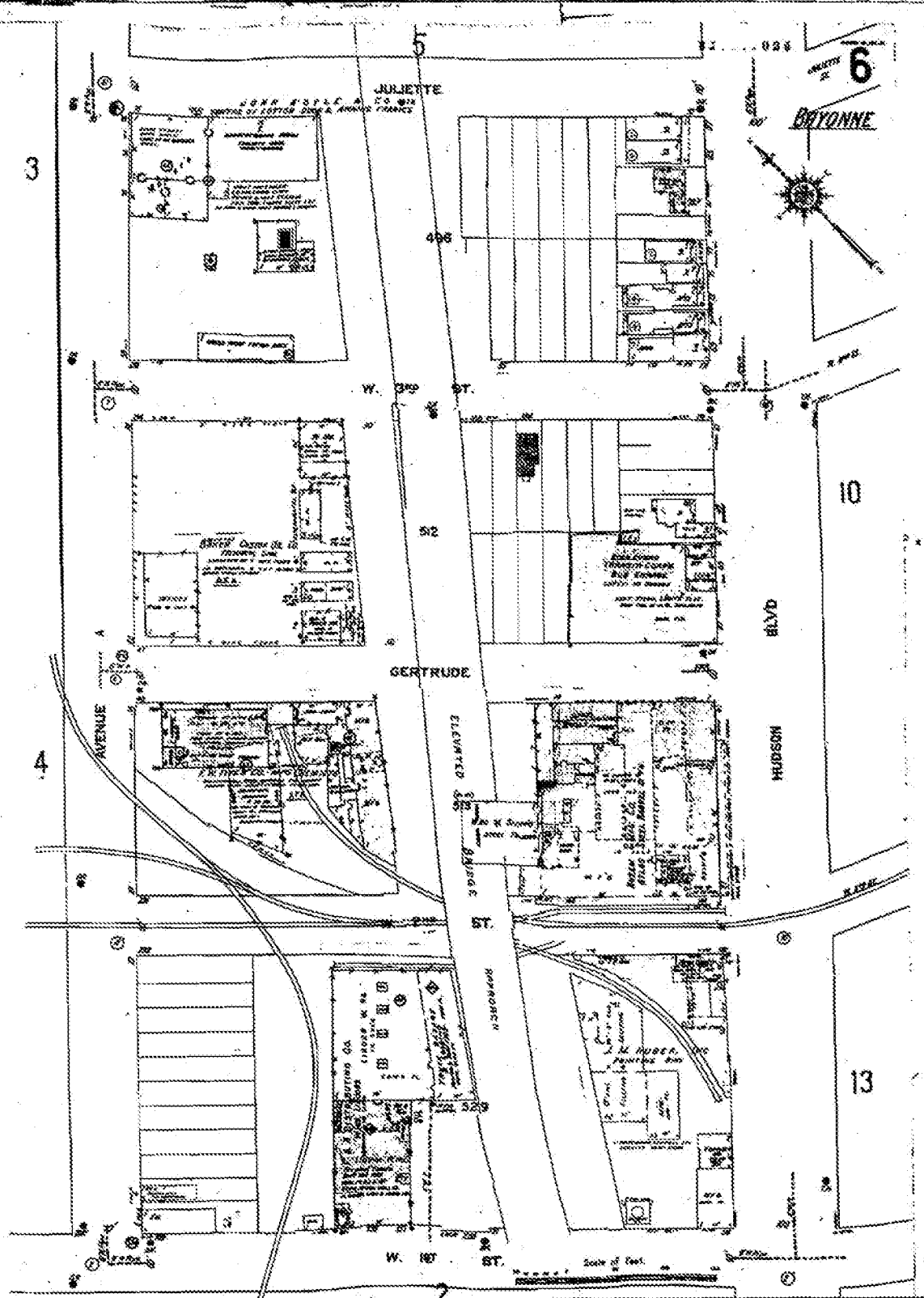

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


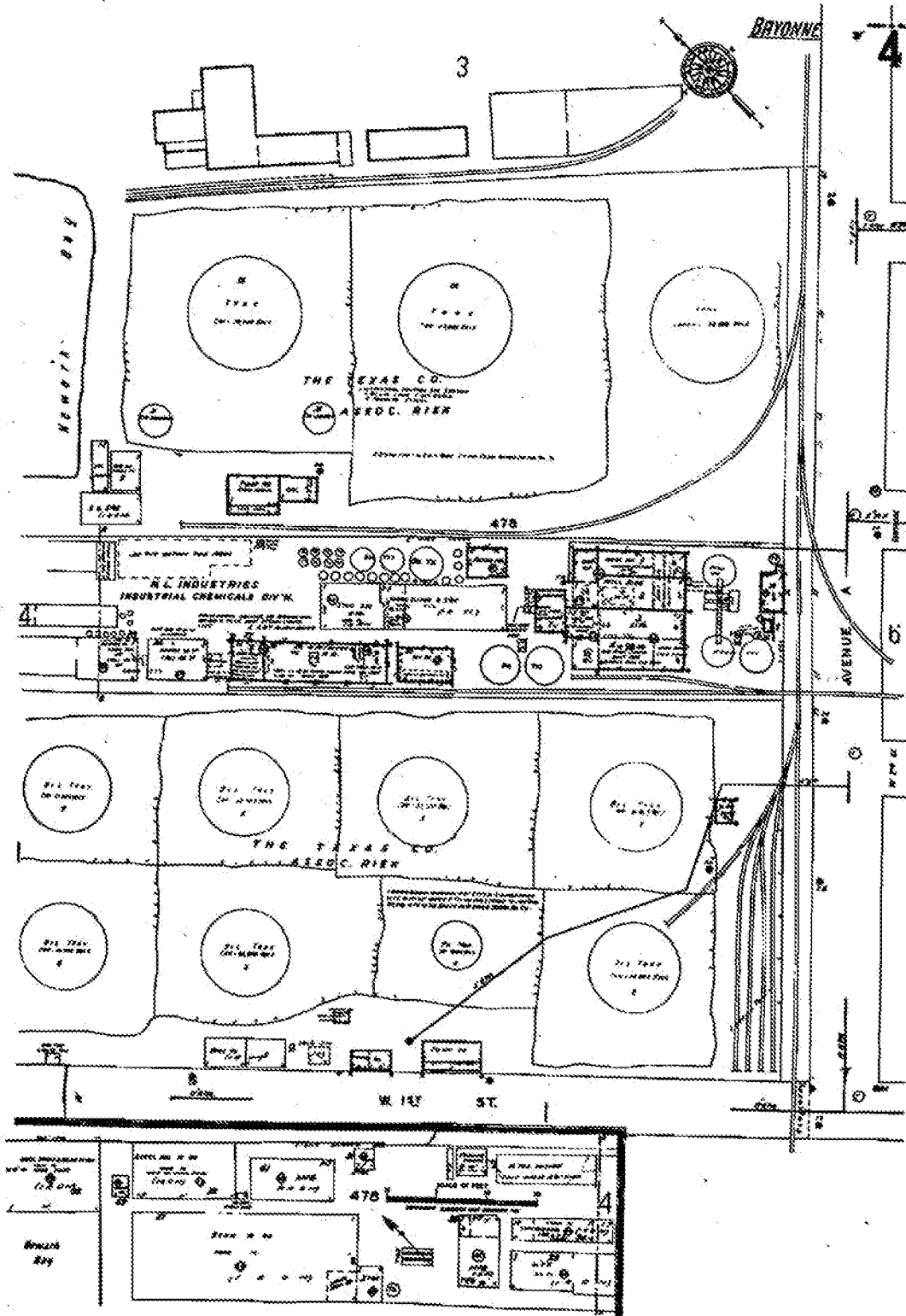

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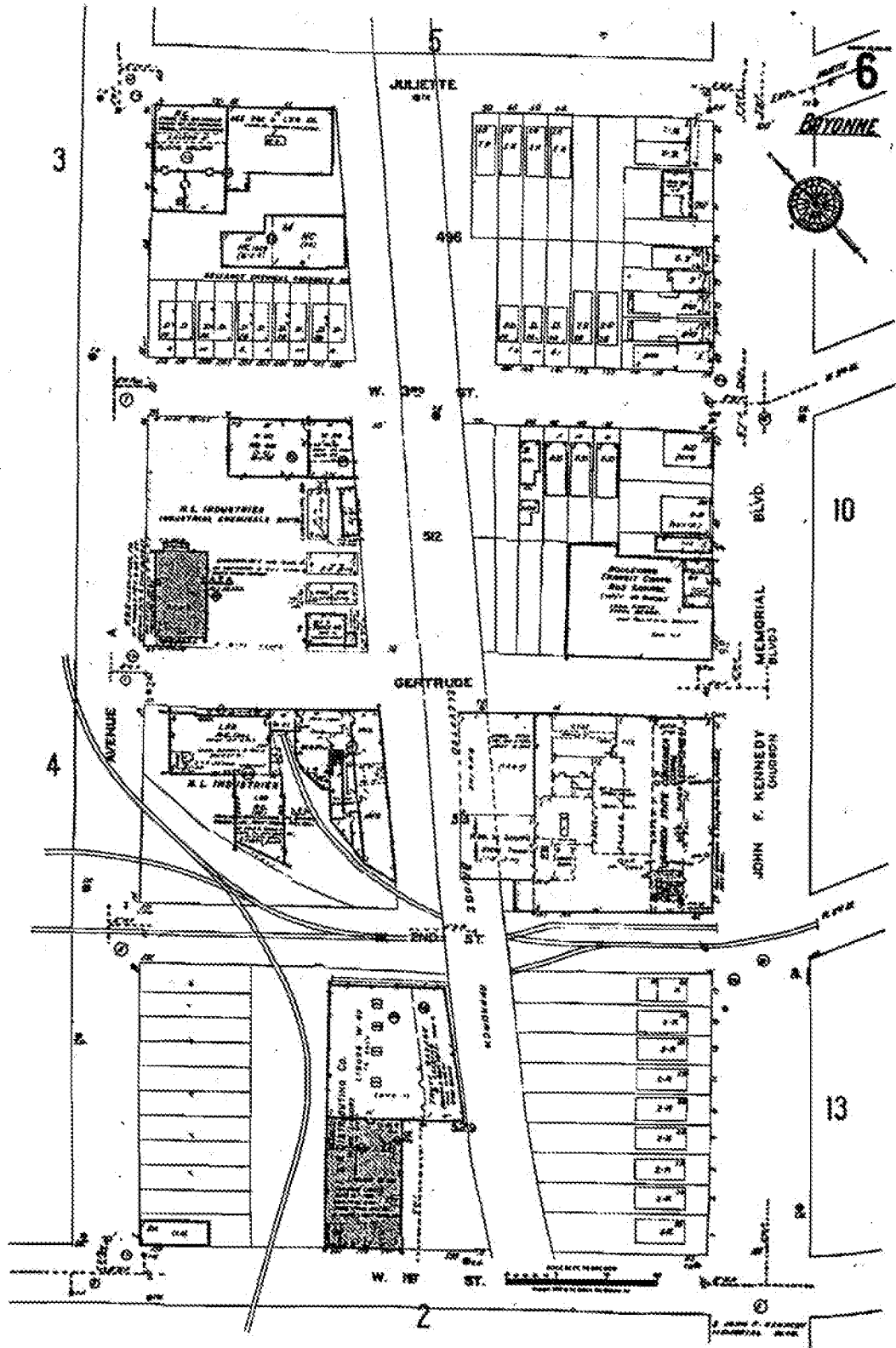

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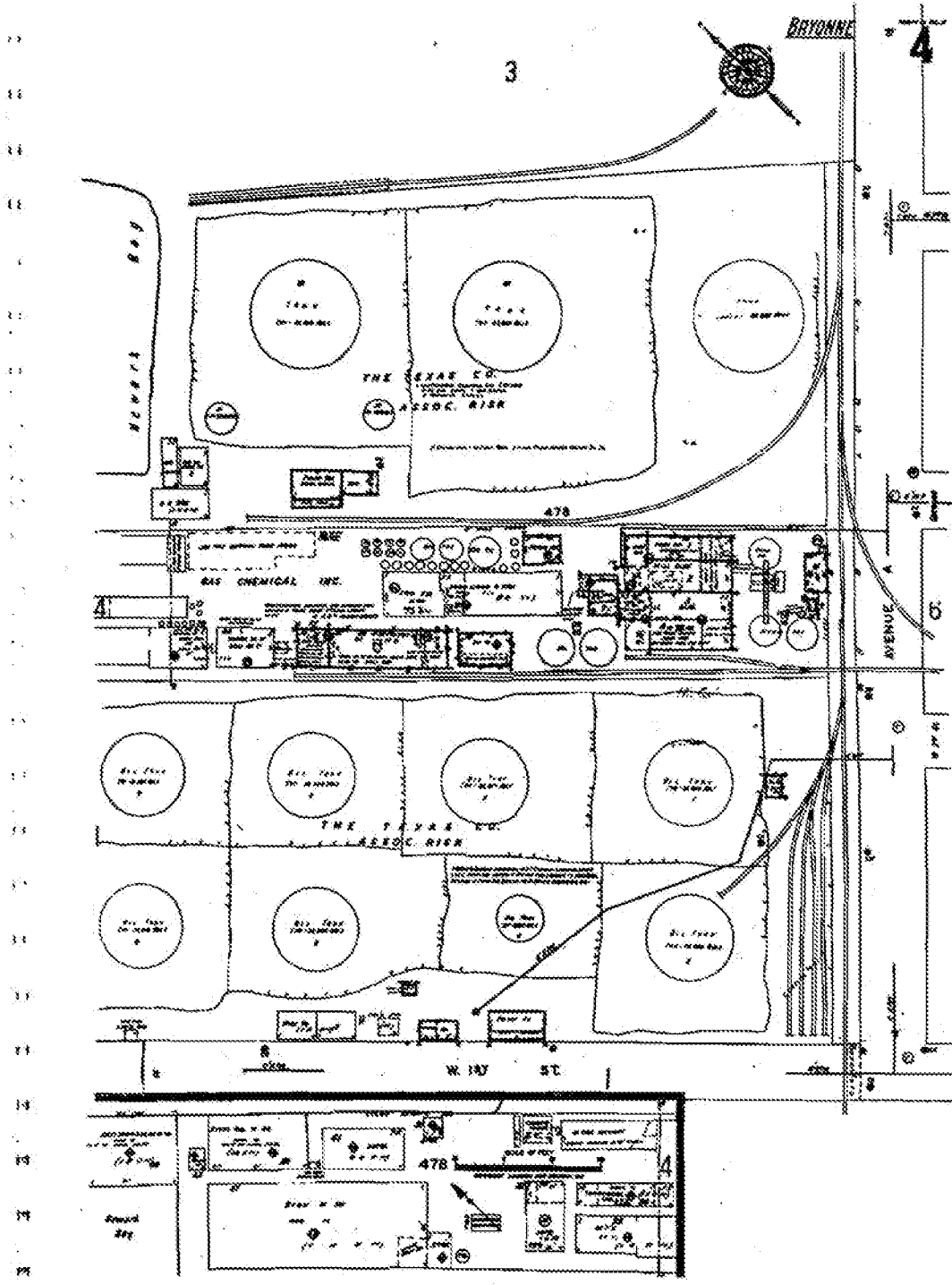
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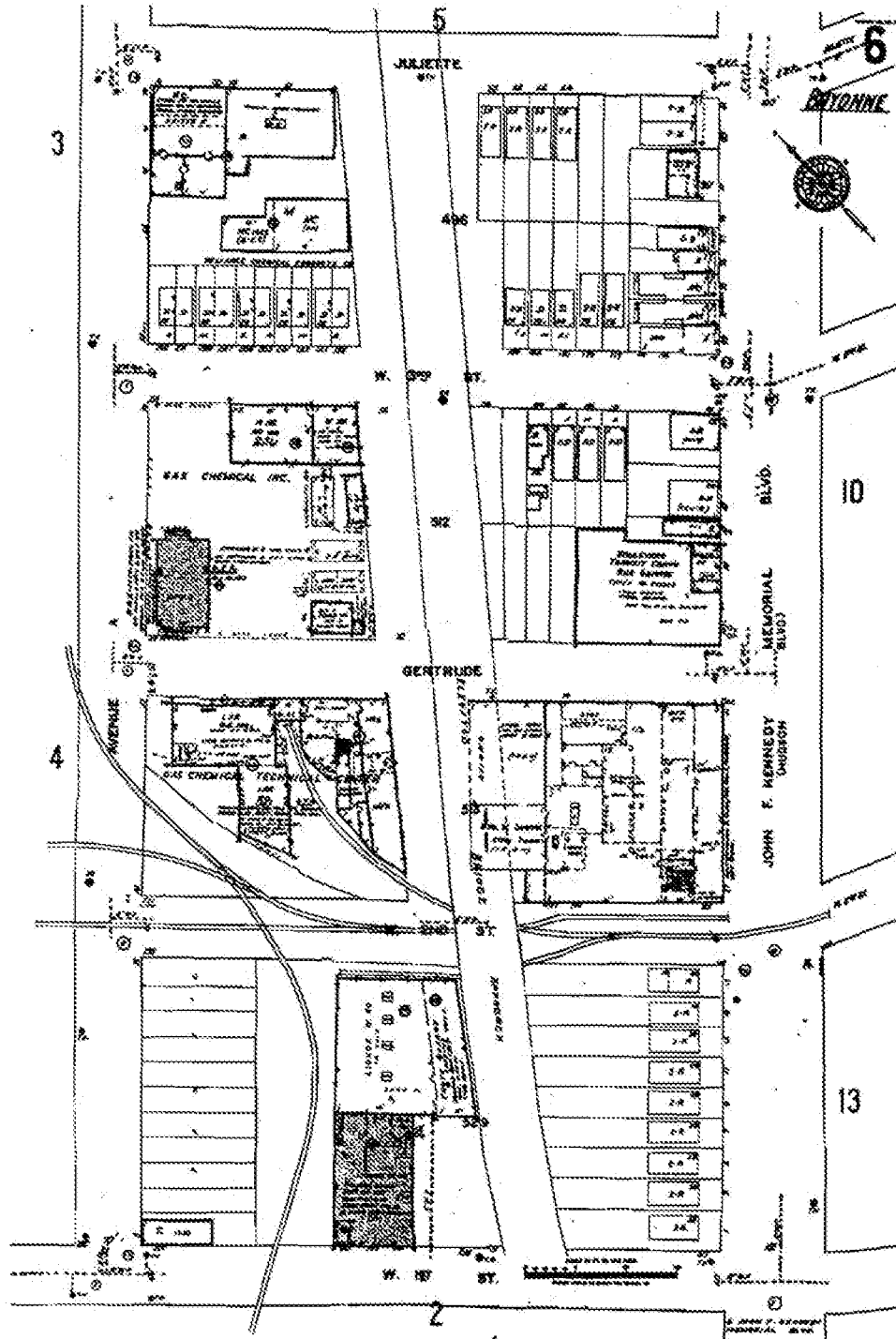




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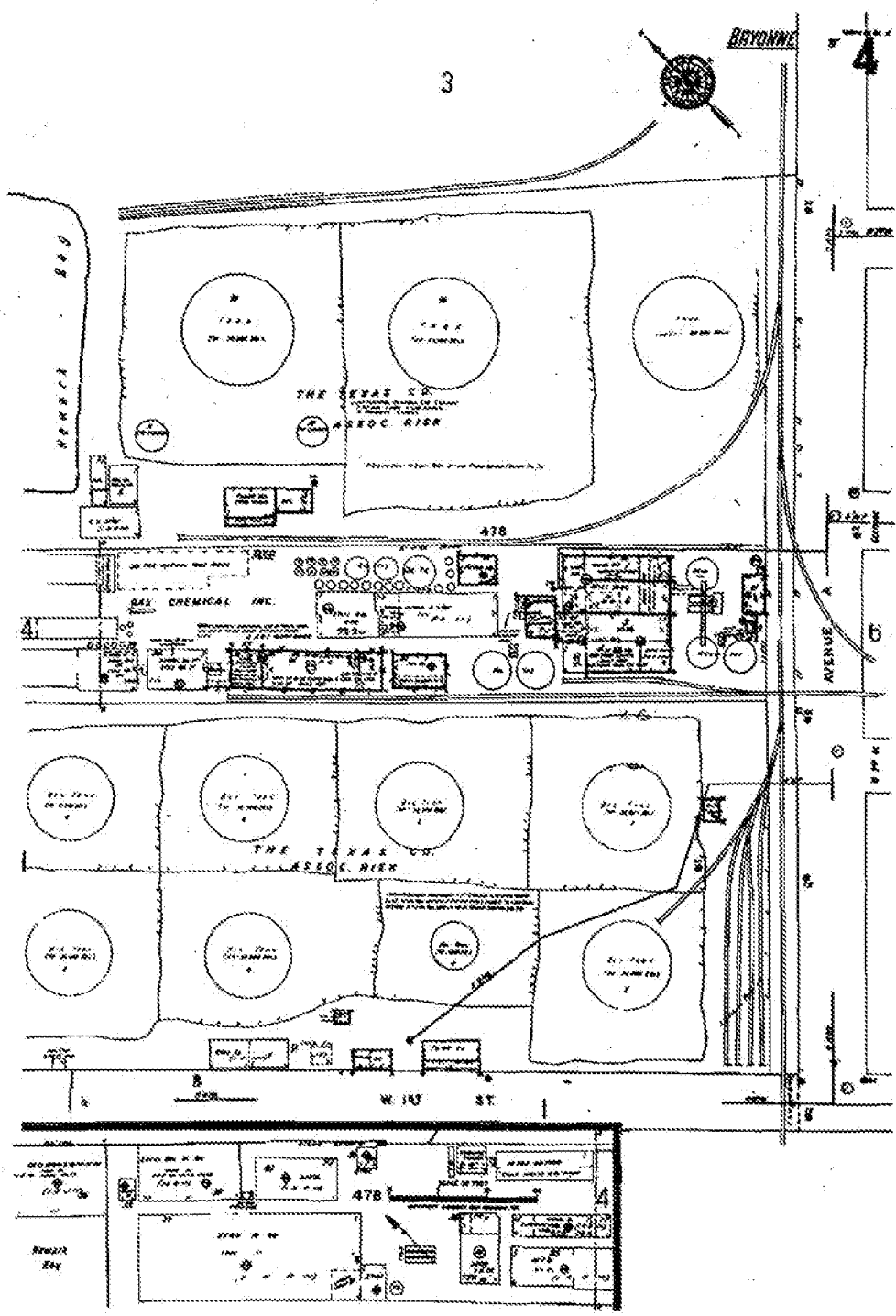





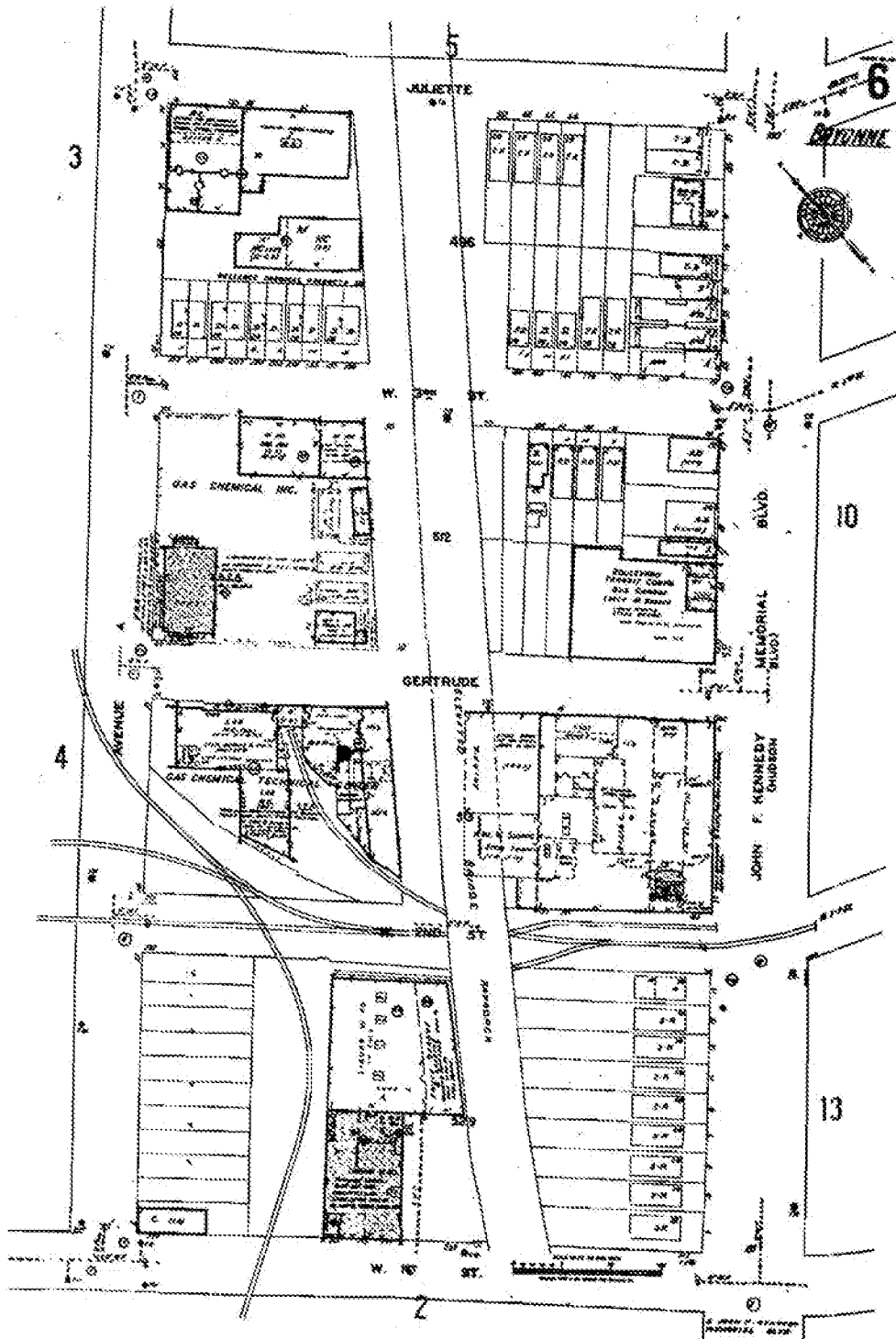

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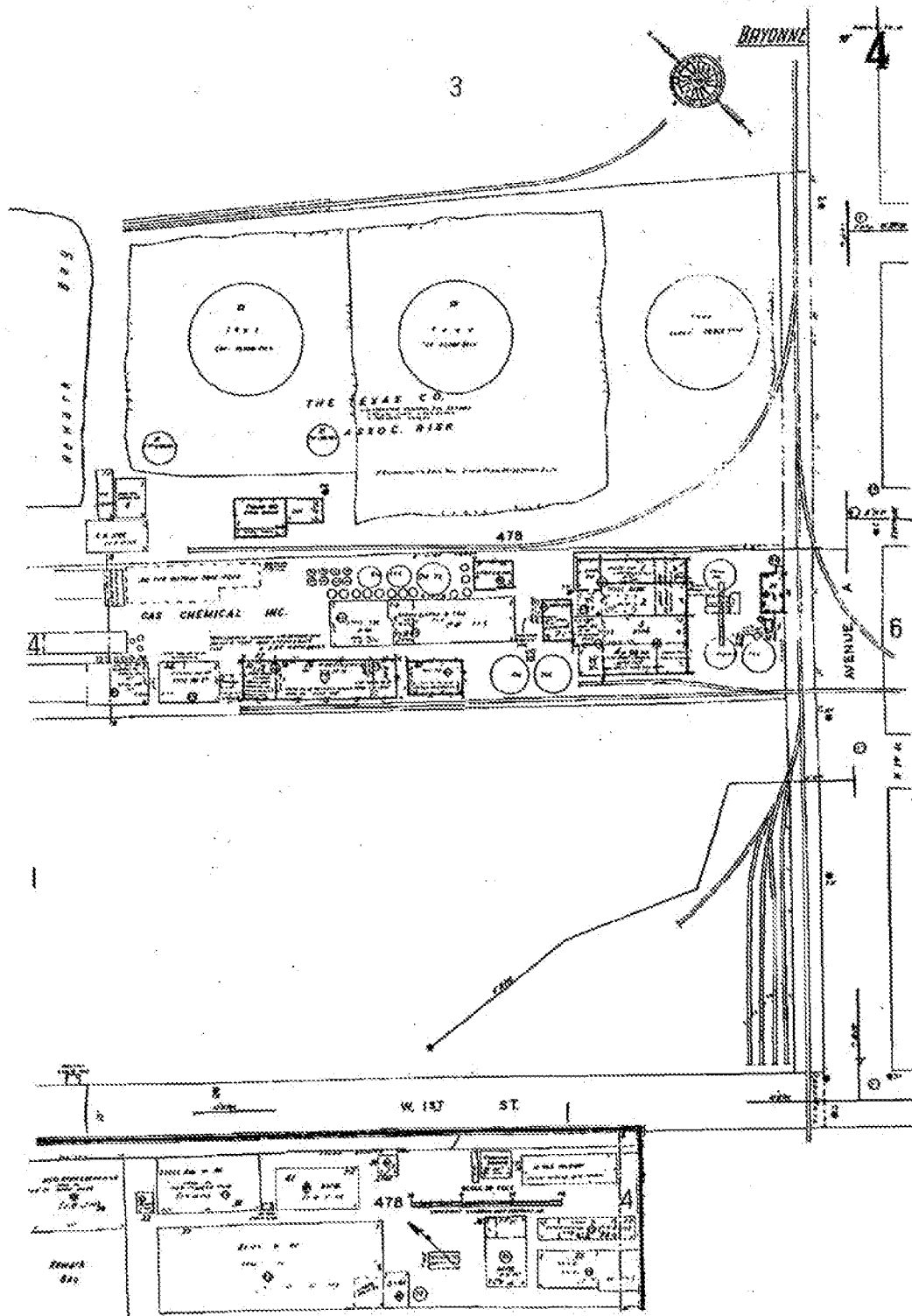

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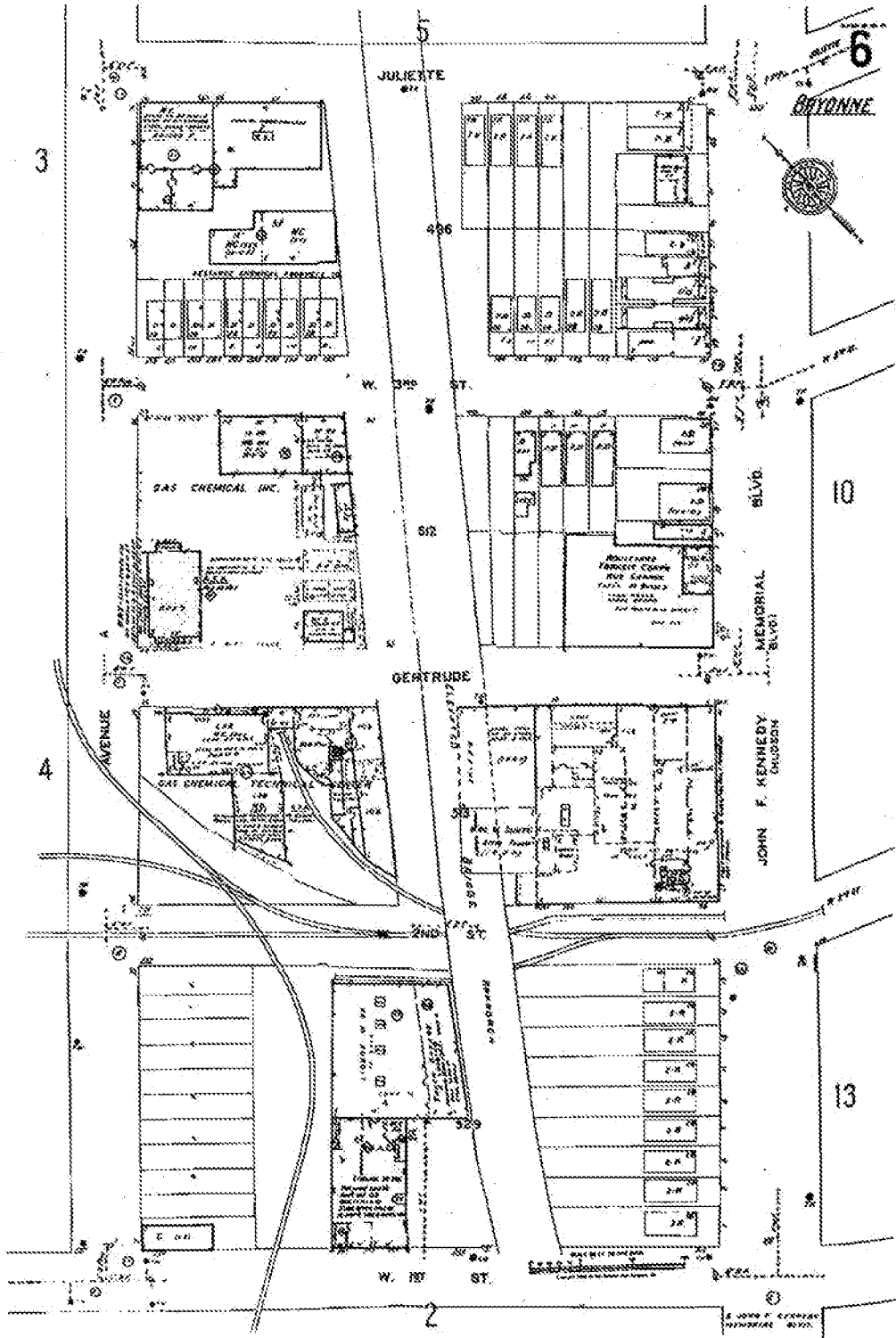
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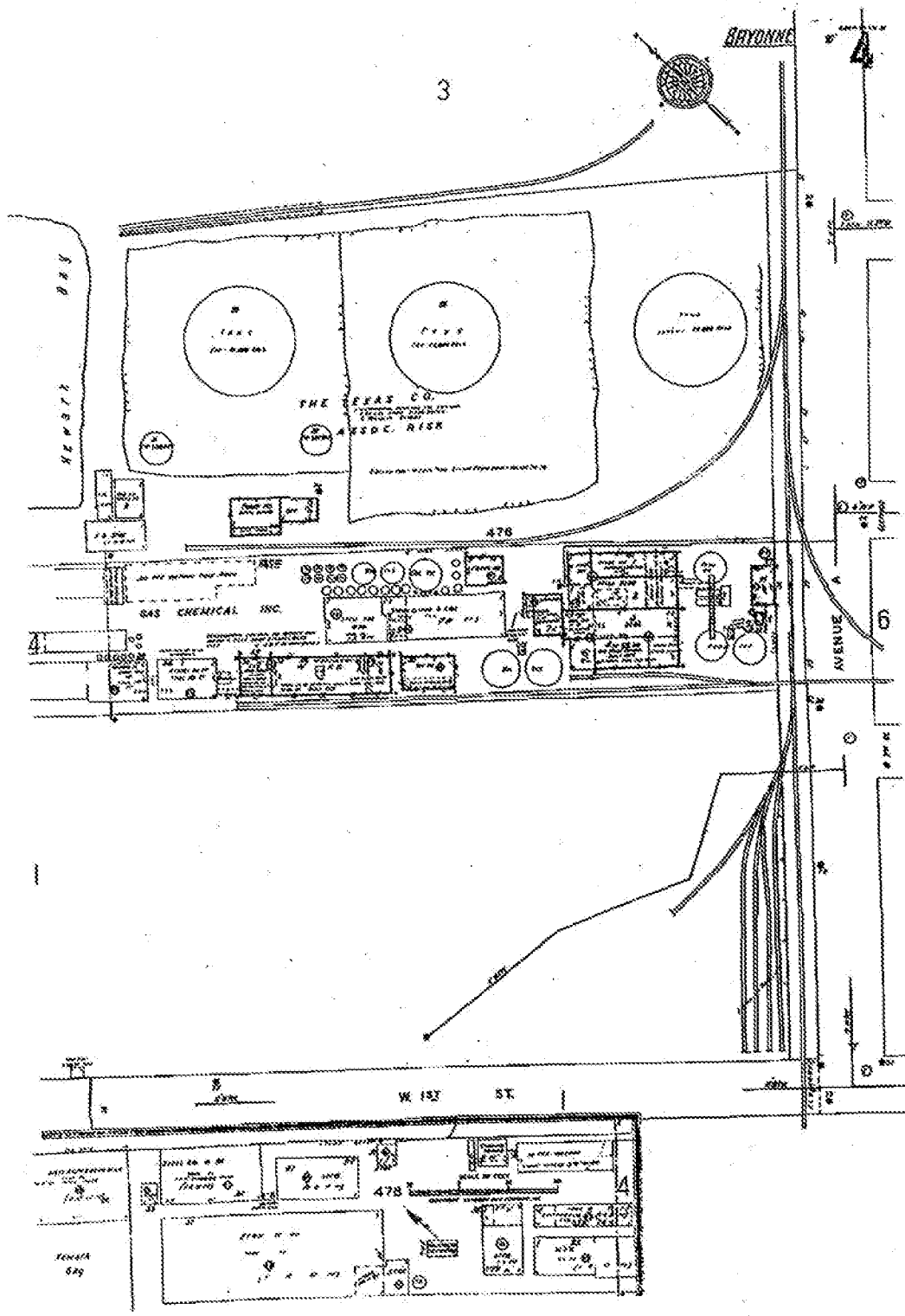
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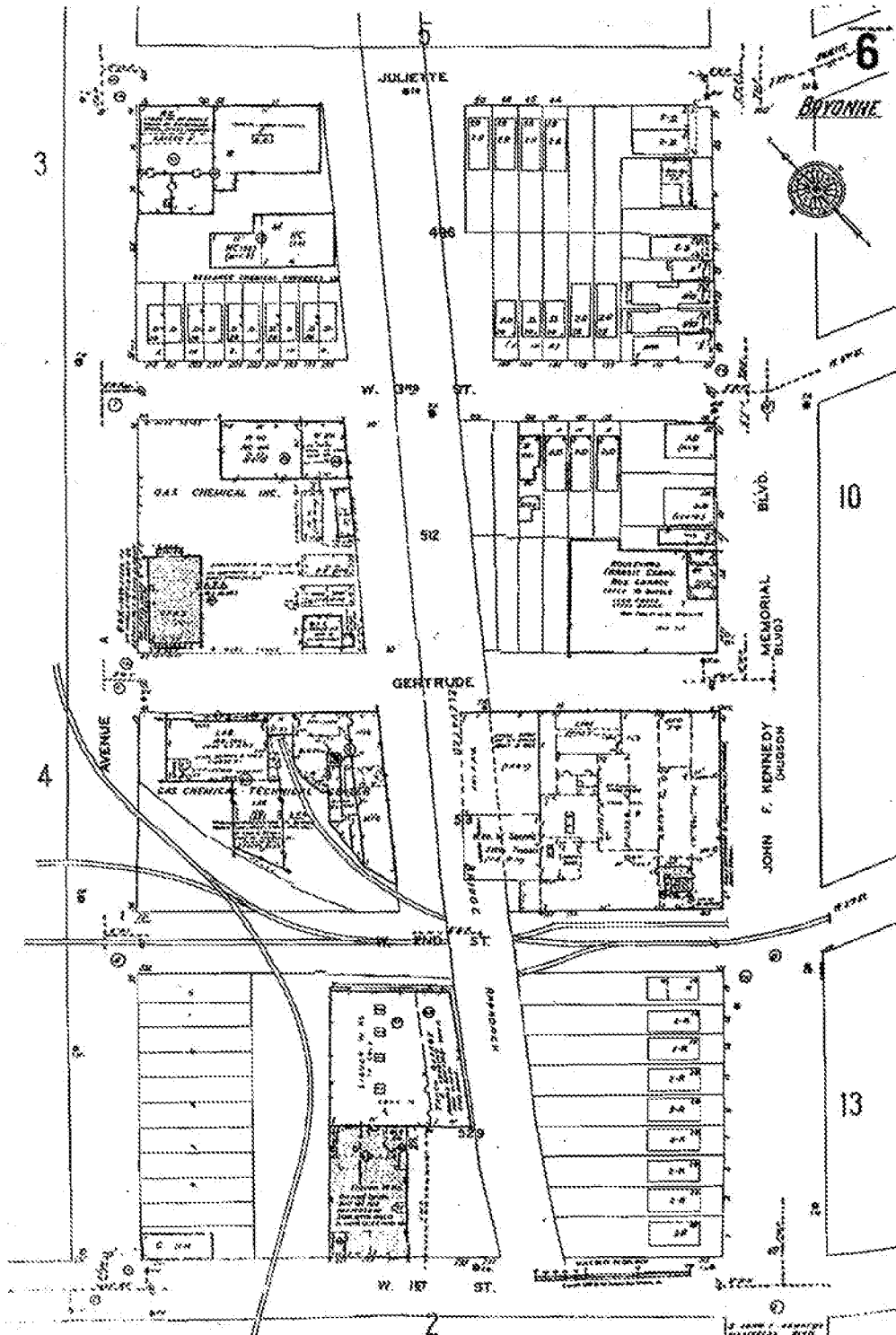
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**Industrial Directory Search Report**



*A Tyco Infrastructure Services Company*



2055 East Rio Salado Parkway, Suite 201

Tempe, Arizona 85281

Phone: (480) 967-6752

Fax Number: (480) 966-9422

Web Site: [www.netronline.com](http://www.netronline.com)

## INDUSTRIAL DIRECTORY SEARCH REPORT

CASCHEM, INC.  
40 AVENUE A  
BAYONNE, NEW JERSEY

Submitted to:

ENVIRONMENTAL DATA RESOURCES, INC.

C/O

EARTH TECH, INC.

Four Neshaminy Interplex  
Trevose, Pennsylvania 19053  
(215) 244-7100

Attention: Vladimir Raskin

Project No. D04-0235

Wednesday, February 25, 2004

NETR Real Estate Research and Information, LLC (NETR) hereby submits the following Industrial Directory Search Report as required in the State of New Jersey Preliminary Assessment Report in accordance with the Technical Requirements N.J.A.C. 7:26-3.1.ii. as well as a means toward meeting the minimum requirements of the due diligence requirements of the innocent purchaser defense as defined by J.J.S.A. 58:10-23-.11g.

The most recent directory listing for the subject property is as follows:

OCCUPANT:	Caschem, Inc.
ADDRESS:	40 Avenue A
SOURCE:	New Jersey Manufacturers Register

## 1. INDUSTRIAL DIRECTORY REPORT

### **1.1 INTRODUCTION TO THE DIRECTORY SOURCE OF INFORMATION:**

As a part of this Industrial Directory Report, NETR reviewed all readily available industrial directories. The Trenton City Library and the New Jersey State Library both located in Trenton, New Jersey maintain a collection of Industrial Directories from 1901 to current. These directories began in 1901 under the auspices of the New Jersey State Department of Labor. Intervening editions were published in 1906, 1909, 1915, 1918, 1927, 1931, 1934, 1938, 1940-41, 1943-44, 1946-47 and 1949-50 and continued the biennial issuance until 1961. The 1962 addition was the first annual edition and was continued annually, thereafter until 1981. From 1982 to 1994 the directories were called MacRae Directories. The most recent directories reviewed are the 1995 to 1998 Harris Official New Jersey Manufacturers Directory and the 1999 to 2003 New Jersey Manufacturers Register. A review of all available resources listed above produced the following Industrial Directory Report:

### **1.2 HISTORY OF PROPERTY:**

#### **1. 1901-1955 NEW JERSEY STATE INDUSTRIAL DIRECTORY:**

OCCUPANT: Subject property not listed.  
MANUFACTURES:  
SIC CODE(S):  
ADDRESS:  
TELEPHONE NO:

#### **2. 1960-1961, 1965, 1971 NEW JERSEY STATE INDUSTRIAL DIRECTORY:**

OCCUPANT: Baker Castor Oil Company  
MANUFACTURES: Castor oil and castor oil derivatives  
SIC CODE(S): 2093  
ADDRESS: 40 Avenue A  
TELEPHONE NO: 436-8800; HE6-8800 (1960-1965)

#### **3. 1975 NEW JERSEY STATE INDUSTRIAL DIRECTORY:**

OCCUPANT: Industrial Chemicals (Division of NL Industries, Inc.)  
MANUFACTURES: Castor Oil and castor oil derivatives  
SIC CODE(S): 2093  
ADDRESS: 40 Avenue A  
TELEPHONE NO: 436-8800

4. 1985 MACRAE'S STATE INDUSTRIAL DIRECTORY:

OCCUPANT: Industrial Chemicals (Division of NL Industries, Inc.)  
MANUFACTURES: Castor Oil and castor oil derivatives  
SIC CODE(S): 2076  
ADDRESS: 40 Avenue A  
TELEPHONE NO: 201-436-8800

5. 1990, 1994 MACRAE'S STATE INDUSTRIAL DIRECTORY:

OCCUPANT: Caschem, Inc.  
MANUFACTURES: Specialty chemicals  
SIC CODE(S): 2899  
ADDRESS: 40 Avenue A  
TELEPHONE NO: 201-858-7900

6. 1995, 1999, 2004 HARRIS' NEW JERSEY MANUFACTURER'S DIRECTORY:

OCCUPANT: Caschem, Inc.  
MANUFACTURES: Castor Oil and castor oil derivatives  
SIC CODE(S): 2076  
ADDRESS: 40 Avenue A  
TELEPHONE NO: 201-858-7900

7. 2000 NEW JERSEY MANUFACTURER'S REGISTER:

OCCUPANT: Caschem, Inc.  
MANUFACTURES: Castor oil based and blended chemicals  
SIC CODE(S): 2819, 2869  
ADDRESS: 40 Avenue A  
TELEPHONE NO: 201-858-7900

## 2. LIMITATION

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**APPENDIX 2**  
**CURRENT SITE OPERATIONS**



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On November 10, 2003, the CasChem site was purchased by, and is currently owned and operated by, Rutherford Chemicals LLC (Rutherford). Site operations include purification of chemicals based on castor oil. The most recent operations conducted at the property by CasChem prior to site purchase by Rutherford included manufacturing operations, consisting of production of chemical derivatives of castor oil and manufacturing of specialty chemicals that are generally classified as personal care intermediates, urethane systems and additives, and painting and coating intermediates. The specific products manufactured at the site changed only slightly over the years to reflect market changes and consumer needs. CasChem was the sole operator at the site during its tenure.

A wide variety of products using castor oil chemistry is processed at the site. These include castor oil esters, fatty acids, surfactants, dehydrated castor oil, hydroxywaxes, polyol reactive diluents, polymerized castor oil and refined castor oil. The principal chemicals that are either currently used to refine castor oil or were used in the past as part of castor oil production included urethane systems consisting of non-hazardous castor-based lubricants and hazardous substances, such as isocyanides, butanol, methanol and various other alcohols and solvents. Storage tanks, buildings' interior and warehouses are used to store raw materials, waste materials, intermediate products and finished products. Raw materials are pumped to mixing tanks within the building, blended, and packaged for storage and offsite distribution in pails, drums, totes, bulk tanks, and bulk trucks.

The property is subdivided into two sections, the Bayside block on the west side of Avenue A and the Eastside block on the east side of Avenue A and on both sides of Gertrude Avenue.

The areas listed in this narrative are indicated on the site plan in Appendix 27.



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**APPENDIX 3**

**HAZARDOUS SUBSTANCE/WASTE INVENTORY**



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Material Name	CAS # if known	Typical annual usage (lbs.)	Storage method (i.e. Drum, tank, jars)
Acetic Acid	64-19-7	<30,000	Tank inside building
Acetic Acid	64-19-7	<30,000	Steel Drum
Acetic Anhydride	108-24-7	<80,000	Tank inside building
Acrylic Acid	79-10-7	<7,000	Steel Drum
Adipic Acid	124-04-9	<80,000	Steel Drum
Adipic Acid	124-04-9	<30,000	Bags
Alkapol SOR490	52625-13-5	<30,000	Steel Drum
Allyl Glycidyl Ether	106-92-3	<30,000	Steel Drum
Alumina, Hydrated		<30,000	Bags
Barium Metaborate Monohydrate;	13701-59-2	<400,000	Bags
Bis(2-ethylhexyl) Adipate	103-23-1	<80,000	AST
Bufferite 230		<30,000	Steel Drum
Butyl Alcohol, N	71-36-3	<30,000	Steel Drum
Casmate DCA		45,000	Steel Drums
Castor Oil and Derivatives	8001-79-4	>10,000,000	AST
Castor Oil and Derivatives	8001-79-4	<700,000	Steel Drum
Castung 103-GH	64147-40-6	<200,000	Steel Drum
Castung 403Z-3	68038-02-8	<700,000	AST
Castung 403Z-3	68038-02-8	<200,000	Steel Drum
Casyl 18-50 SD: SSO		<30,000	Steel Drum
Cetyl Alcohol	36853-82-4	<30,000	Bags
Cotin 252 Concentrate		900	Bags
Cotin 252 Blend		390	Steel Drum
Cumene	98-82-8	<30,000	Steel Drum
Desmodur W (D014)	101-68-8	<7,000	Steel Drum
Di-T-Butyl Peroxide	110-05-4	<30,000	Steel Drum
Dibutyl Tin Oxide	818-08-6	<7,000	AST in building
DOA	103-23-1	<70,000	AST
Dodecyl Phenol	27193-86-8	<30,000	Steel Drum
EP Copolymer		<200,000	Steel Drum
Durasyn 170	68037-01-04	<200,000	Tank inside building
Ethanolamine	141-43-5	<30,000	Steel Drum
Ethoxylated Castor Oil	61791-12-6	<200,000	AST
Ethoxylated Castor Oil	61791-12-6	<700,000	Steel Drum
Ethylene Glycol	107-21-1	<30,000	Tote Bin
Ethylene Glycol	107-21-1	<30,000	Steel Drum
Ethylenediamine	107-15-3	<7,000	Steel Drum

BIS(2-ETHYLHEXYL) ADIPATE



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Material Name	CAS # if known	Typical annual usage (lbs.)	Storage method (i.e. Drum, tank, jars)
Fatty Acids and Esters (Bags)	61789-45-5	<30,000	Bags
Fatty Acids and Esters (Bulk)	61789-45-5	<70,000	AST
Fatty Acids and Esters (Drums)	61789-45-5	<5,000,000	Steel Drum
Fatty Alcohols (Bins)		<30,000	Tote Bin
Fatty Alcohols (Bulk)		<400,000	AST
Fatty Alcohols (Drums)		<30,000	Steel Drum
Flexicins (Bulk)		<200,000	AST
Flexicins (Drums)		<400,000	Steel Drum
No. 2 Fuel Oil	68476-30-2	<2,000	AST in building
No. 6 Fuel Oil (historical-discontinued use in 2002)	68476-33-5	<100,000	ASTs/USTs (now closed)
Gasoline	8006-61-9	<30,000	Small USTs (now closed)
Glycerine	56-81-5	<30,000	Steel Drum
Glycols (Bins)	NA	<30,000	Tote Bin
Glycols (Drums)	NA	<7,000	Steel Drum
Hazardous Waste, N. O. S.	NA	<7,000	Steel Drum
Hazardous Waste, N. O. S.	NA	<70,000	AST
Heptane	142-82-5	<30,000	Steel Drum
Hexadecene	629-73-2	<30,000	Steel Drum
Hydrogen	1333-74-0	<30,000	Cylinders
Hydrotreated Oil and Additives (Bulk)		<200,000	AST
Hydrotreated Oil and Additives (Drums)		<7,000	Steel Drum
Isooctyl Tallate	68333-78-8	<30,000	Steel Drum
Indapol H-300	9003-29-6	<70,000	Tank inside building
Irganox	41484-35-9		
Lithium Ricinoleate 50%		4,400	Steel Drum
Lubricins		<200,000	Steel Drum
Magnesium Ricinoleate		9,280	Steel Drum
Methanol	67-56-1	<70,000	AST
Methyl 12-Hydroxystearate		<70,000	Bags
Methyl-2-Pyrrolidone, N-	872-50-4	<30,000	Steel Drum
Methylene bis (Phenylisocyanate)	101-68-8	<200,000	Bags
Methylene bis (Phenylisocyanate)	101-68-8	<30,000	Steel Drum
Mineral Spirits		<30,000	Steel Drum
Mondur MRS (MO38-DR)	101-68-8	<30,000	Steel Drum
Monoethanolamine	141-43-5	<30,000	Steel Containers
Naturechems		<70,000	Steel Drum
Neutrogena Oil		15,500	Steel Drums
Nickel	7440-02-0	<30,000	Steel Drum
Nitrogen (Compressed or Liquified)	7727-37-9	<70,000	AST



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Material Name	CAS # if known	Typical annual usage (lbs.)	Storage method (i.e. Drum, tank, jars)
N-Decane		<10,000	Bags
N-Dodecane		<10,000	Bags
N-Tetradecane		<10,000	Bags
N-Pentadecane		<10,000	Bags
N-Hexadecane		<10,000	Bags
N-Octadecane		<10,000	Bags
N-Nonadecane		<10,000	Bags
Octyl Tallate		<30,000	Steel Drum
2-Octanol	123-96-6	<25,000	AST
P-10 Acid Bulk and Intermediate		<30,000	Bags and Steel Drums
Paracin 8		<30,000	Steel Drum
Paracin 220	106-15-0	<70,000	Bags
Paracins 285	123-26-2	<30,000	Bags
Pentaerythritol (Drums)	115-77-6	<30,000	Bags
Pentabromodiphenyl Oxide		<70,000	Steel Drum
Phosphoric Acid	7664-38-2	<30,000	Carboy
Poly BD-R-45 PO36-BU	69102-90-5	<200,000	Tank inside building
Polycins (Bags)		<200,000	Bags
Polycins (Bulk)		<400,000	AST
Polycins (Drums)		<400,000	Steel Drum
Polypropylene Glycol	25322-69-4	<30,000	Steel Drum
Propane	74-98-6	<7,000	Cylinders
Resin Solutions		<1	Steel Drums
R-21 Acid		<4,000	Steel Drums
Sebacic Acid (Bags)	111-20-6	<70,000	Bags
Sebacic Acid (Drums)	111-20-6	<200,000	Steel Drum
Sodium Hydroxide	1310-73-2	<30,000	Tank inside building
Sodium Hydroxide	1310-73-2	<30,000	Steel Drum
Sodium Nitrate	7631-99-4	<30,000	Tote Bin
Sulfur	7704-34-9	<30,000	Fiber Drum
Sulfuric Acid	7664-93-9	<30,000	Plastic Drum
Sulfuric Acid	7664-93-9	<30,000	AST
Sulfuric Acid	7664-93-9	<70,000	Tank inside building
Toluene	108-88-3	<7,000	Steel Drum
Trimethylol Propane (T028-BG)	77-99-6	<70,000	Bags
Toluene Diisocyanate	584-84-9	<200,000	Tank
Tripropylene Glycol		<30,000	Steel Containers
Undecylenic Acid (Drums)	112-38-9	<70,000	Steel Drum and AST

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Material Name	CAS # if known	Typical annual usage (lbs.)	Storage method (i.e. Drum, tank, jars)
Vegetable Oils		<70,000	Steel Drum
Vorites		<400,000	Steel Drum
Waxes (Bags)		<400,000	Bags
Waxes (Fiber Drums)		<400,000	Fiber Drum
White Tech Oil W006-BU (Mineral Oil)	8031-03-6	<70,000	AST
Xylene (Mixed Isomers)	1330-20-7	<30,000	Steel Drum
Xylene - Spent	1330-20-7	<30,000	Steel Drum
Zylecs		<60,000	Bags
Zinc Compounds	N982	<7,000	Bags

MS-5



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**APPENDIX 4**  
**ABOVEGROUND STORAGE TANKS (AOC-1)**



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CasChem stored its raw products and wastes in a series of aboveground storage tanks (ASTs) that are grouped according to each specific location onsite as described below.

During the site inspection on March 3, 2004, all the facility's ASTs were in good condition, with no rust or stains observed. All the ASTs are kept within impermeable secondary containment, consisting of concrete, block walls or sheet steel. All containments were designed to have sufficient storage capacity for the largest tank plus 6" of rainwater. The majority of the materials stored are either castor oil or derivatives of castor oil, and would not negatively impact soil even if a release occurred.

CasChem implemented and submitted Discharge Prevention, Containment and Countermeasure Plan (DPCC) to NJDEP as required by N.J.A.C. 7:1E. The transportation, storage, handling, and use of these materials are conducted according to all applicable provisions contained in the NJDEP and federal regulations. Mr. Seth Levine of Cambrex indicated that the storage area base and berm walls were in place and operational well before the 1990s.

**L. AST Area 1 – Northwest Yard Tank Farm (AOC-1-A)**

This AST farm is located at the northwestern end of the property, to the north of Buildings 38A, 28, 25, and 34. These tanks are as follows:

Northwest Yard Tank Farm			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
190	Crude 120 Fatty Acid	25,000	Carbon Steel/Flat Roof
191	Castung 103 GH	25,000	Carbon Steel/Flat Roof
192	R-911 Fatty Acid	25,000	Carbon Steel/Flat Roof
193	Castor Oil	25,000	Carbon Steel/Flat Roof
194	2-Octanone	25,000	Carbon Steel/Flat Roof
195	2-Octanone	25,000	Carbon Steel/Flat Roof
196	White Mineral Oil	25,000	Carbon Steel/Flat Roof
197	Castung 103 GH	25,000	Carbon Steel/Flat Roof
198	Castung 103 GH	25,000	Carbon Steel/Flat Roof
199	2-Octanol	25,000	Carbon Steel/Flat Roof
200	No. 1 Imported Castor Oil	25,000	Carbon Steel/Flat Roof
201	2-Octanone	25,000	Carbon Steel/Flat Roof
202	R-911 Fatty Acid	25,000	Carbon Steel/Flat Roof
203	R-911 Fatty Acid	25,000	Carbon Steel/Flat Roof
204	Castung 103 GH	25,000	Carbon Steel/Flat Roof
205	Castung 103 GH	25,000	Carbon Steel/Flat Roof
206	Castung 103 GH	25,000	Carbon Steel/Flat Roof
207	2-Octanol	25,000	Carbon Steel/Flat Roof
208	R-911 Fatty Acid	25,000	Carbon Steel/Flat Roof
209	No. 1 Imported Castor Oil	25,000	Carbon Steel/Flat Roof
210	Neutral Castor Oil	25,000	Carbon Steel/Flat Roof
211	R-911 Fatty Acid	25,000	Carbon Steel/Flat Roof
212	AA Standard Castor Oil	25,000	Carbon Steel/Flat Roof
213	No. 1 Imported Castor Oil	25,000	Carbon Steel/Flat Roof
214	Flexrein P-8	25,000	Carbon Steel/Flat Roof



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Northwest Yard Tank Farm (Continued)			
Tank ID No.	Product Stored	Capacity	Tank Material/Type
215	R-911 Fatty Acid	25,000	Carbon Steel/Flat Roof
216	2-Octanol	25,000	Carbon Steel/Flat Roof
217	Dicapryladipate	25,000	Carbon Steel/Flat Roof
218	Empty (Formerly Recovered Butanol)	25,000	Carbon Steel/Flat Roof
219	Methanol	4,950	Carbon Steel/Flat Roof
220	Acetic Anhydride	6,925	Carbon Steel/Flat Roof
221	White Mineral Oil	1,875	Carbon Steel/Flat Roof
222	2-Octanol	25,000	Carbon Steel/Flat Roof
223	2-Octanol	25,000	Carbon Steel/Flat Roof
224	No. 1 Imported Castor Oil	25,000	Carbon Steel/Flat Roof
225	Recovered Butyl Alcohol	13,500	Carbon Steel/Flat Roof
226	DOA (Adipic Acid)	13,500	Carbon Steel/Flat Roof
227	R-911 Fatty Acid	25,000	Carbon Steel/Flat Roof
228	2-Octanol	25,000	Carbon Steel/Flat Roof
229	2-Octanol	25,000	Carbon Steel/Flat Roof
230	Recovered Methanol	25,000	Carbon Steel/Flat Roof
231	Extra Pale Castor Oil	25,000	Carbon Steel/Flat Roof
327	Isopropyl Palmitate	18,000	Carbon Steel/Flat Roof
328	Isopropyl Myristate	18,000	Carbon Steel/Flat Roof
329	P-3531	18,000	Carbon Steel/Flat Roof
283	Former Concentrated Sulfuric Acid (was emptied and removed from the site)	4,400	Carbon Steel/Flat Roof
286	No. 1 Imported Castor Oil	25,000	Carbon Steel/Flat Roof
287	No. 1 Imported Castor Oil	25,000	Carbon Steel/Flat Roof

The only known hazardous substances used or stored at the Northwest Yard Tank Farm are concentrated Sulfuric Acid, 2-Octanol and White Mineral Oil. The former 4,400-gallon Concentrated Sulfuric Acid AST was present approximately 20 feet west of the old cooling water tower; it is unknown whether the tank was always situated within secondary containment. Based upon review of the historical site plans of the facility, there is no indication that the area housing or surrounding the Northwest Yard Tank Farm was paved. Additional potential hazardous substances are constituents of Adipic Acid and Recovered Butyl Alcohol.

Former Building 30, identified as Miscellaneous Storage, was present at the current location of the eastern half of the Northwest Yard Tank Farm. Former Building 31, identified as Fatty Acids and Plasticizers Drum Storage, was present at the present location of the western half of the Northwest Yard Tank Farm. Therefore, the investigation proposed in Appendix 15 for the former Buildings 30 and 31 will address any concerns regarding potential discharge of hazardous substances stored in the tanks of the Northwest Tank Farm.



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## 2. AST Area 2 – Northeast Yard Tank Farm (AOC-1-B)

This AST farm is located at the northeastern end of the property, to the north of Building 9. The tanks in this AST Farm include:

Northeast Yard Tank Farm			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
12	Castor Oil	25,000	Carbon Steel/Cone Roof
13	Castor Oil	25,000	Carbon Steel/Cone Roof
21	Castor Oil	25,000	Carbon Steel/Cone Roof
22	Castor Oil	25,000	Carbon Steel/Cone Roof
23	Castor Oil	25,000	Carbon Steel/Flat Roof
70	Castor Oil	25,000	Carbon Steel/ Cone Roof
71	Slop Oil – Castor Crude	25,000	Carbon Steel/ Cone Roof
72	Castor Oil	25,000	Carbon Steel/ Cone Roof
73	Pale 1,000 Castor Oil	25,000	Carbon Steel/ Cone Roof
74	AA Standard Castor Oil	25,000	Carbon Steel/ Cone Roof
75	Castor Oil	25,000	Carbon Steel/ Cone Roof
76	Castor Oil	25,000	Carbon Steel/ Cone Roof
77	Water	25,000	Carbon Steel/ Cone Roof
296	Empty (Former Fatty Acids)	25,000	Carbon Steel/ Cone Roof
297	Empty (Former Castor Oil)	25,000	Carbon Steel/ Cone Roof
299	Empty (Former Recycled Diluent Oil)	25,000	Carbon Steel/ Cone Roof
300	No. 1 Imported Castor Oil	25,000	Carbon Steel/Cone Roof
301	Crystal O Castor Oil	3,500	Carbon Steel/Flat Roof
302	Crystal O Castor Oil	3,500	Carbon Steel/Flat Roof
303	Crystal O Castor Oil	4,000	Carbon Steel/Flat Roof
1Y	Extra Pale Castor Oil	212,000	Carbon Steel/ Cone Roof
2Y	No. 1 Imported Castor Oil	110,000	Carbon Steel/ Cone Roof
3Y	AA Standard Castor Oil	110,000	Carbon Steel/ Cone Roof

Constituents of Diluent Oil may contain petroleum hydrocarbons; the remainder of the materials stored in the current or former tanks in the Northeast Yard Tank Farm are not categorized as hazardous substances. According to facility personnel and as was confirmed during review of historical records, this area was always used for storage of castor oil with no hazardous substances stored in this area. Tank 299 (former Diluent Oil) is located outside the eastern corner of Building 9 and at the western corner of the unused Sebacic Acid Process Area.

The investigation proposed in Appendix 15 for the former Building 30, will address any concerns regarding potential discharge of Diluent Oil stored at the Northwest Tank Farm.



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### 3. AST Area 3 – Southeast Yard Tank Farm (AOC-1-C)

This AST farm is located to the west and east of Building 4. The tanks in this AST area include:

Southeast Yard Tank Farm			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
B	No. 1 Imported Castor Oil	650,000	Carbon Steel/ Cone Roof
C	No. 1 Imported Castor Oil	650,000	Carbon Steel/ Cone Roof
D	No. 1 Imported Castor Oil	650,000	Carbon Steel/ Cone Roof
E	No. 1 Imported Castor Oil	650,000	Carbon Steel/ Cone Roof

None of the current tanks in the Southeast Yard Tank Farm contain hazardous substances. According to facility personnel and as was confirmed during review of historical records, this area was always used for storage of castor oil with no hazardous substances stored in this area. No further investigation is proposed regarding the AOC-1-C.

### 4. AST Area 4 – Building 25 Tanks (AOC-1-D)

Building 25 Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
124	No. 2 Fuel Oil	1,500	Carbon Steel/ Flat Roof
139	Recovered Acetic Acid	5,800	Carbon Steel/ Flat Roof
140	Recovered Acetic Acid	4,800	Carbon Steel/ Flat Roof
142	9-11 Acids	650,000	Carbon Steel/ Cone Roof
Unknown	Durasyn 170	5,800	Carbon Steel/ Cone Roof
Unknown	Indopol H-300	5,800	Carbon Steel/ Cone Roof

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of fuel oil, acetic acid or hazardous constituents of 9-11 acids stored or used in Building 25.



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**5. AST Area 5 – Building 26 Tanks (AOC-1-E)**

Building 26 Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
25	50% Caustic Soda (Basement)	8,700	Carbon Steel/ Flat Roof
35	50% Caustic Soda (Basement)	8,700	Carbon Steel/ Flat Roof
41	No. 2 Fuel Oil (Basement)	8,700	Carbon Steel/ Cone Roof
51	No. 2 Fuel Oil (Basement)	8,700	Carbon Steel/ Cone Roof
80	Castor Oil	3,750	Carbon Steel/ Cone Roof
81	Castor Oil	3,750	Carbon Steel/ Cone Roof
82	Extra Pale Oil	3,750	Carbon Steel/ Cone Roof
83	Castor Oil	3,750	Carbon Steel/ Cone Roof
84	FNO	656	Carbon Steel/ Cone Roof
85	FNO	656	Carbon Steel/ Cone Roof
86	FNO	656	Carbon Steel/ Cone Roof
87	No. 1 Imported Castor Oil	3,750	Carbon Steel/ Cone Roof
88	FNO	2,355	Carbon Steel/ Cone Roof
89	AA Standard	5,862	Carbon Steel/ Cone Roof
92	Extra Pale Oil	3,725	Carbon Steel/ Cone Roof
93	AA USP	3,725	Carbon Steel/ Cone Roof
94	FNO	2,355	Carbon Steel/ Cone Roof
95	FNO	2,355	Carbon Steel/ Cone Roof
96	Poly BD	5,800	Carbon Steel/ Cone Roof
99	Poly BD	5,800	Carbon Steel/ Cone Roof
112	50% Caustic Soda	1,577	Carbon Steel/ Flat Roof

The only hazardous materials present in Building 26 are Sodium Hydroxide (50% Caustic Soda) and No. 2 Fuel Oil in tanks, all present in the basement. Each tank has an associated transfer pump. During the site inspection, the concrete floor of the basement in the Building 26 was intact; there is a concrete-lined containment trench that runs along the base of the tanks, for the entire length of the basement. The trench reportedly discharges into the onsite Wastewater Treatment Plant. During the site inspection, the trench contained some turbid water and, as such, was inaccessible for an inspection.

CasChem proposes to clean the conveyance trench near the No. 2 Fuel Oil and Sodium Hydroxide tanks in preparation for visual inspection. Following the cleaning, the trench will be inspected to document that the structural integrity of the trench is intact.

**6. AST Area 6 – Building 28 Tanks (AOC-1-F)**

Building 28 Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
139	Sulfuric Acid	1,350	Carbon Steel/ Flat Roof
140	Sulfuric Acid	1,350	Carbon Steel/ Flat Roof

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of sulfuric acid.

**7. AST Area 7 – Building 34 Tanks (AOC-1-G)**

Building 34 Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
276	Dehydrated Castor Oil	3,822	Carbon Steel/ Flat Roof
T801	Sodium Hydroxide	3,822	Carbon Steel/ Flat Roof

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of Sodium Hydroxide.

**8. AST Area 8 – Building 9 Tanks (AOC-1-H)**

Building 9 Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
WT-1	50% Caustic Soda	550	Carbon Steel/ Flat Roof
WT-2	Sulfuric Acid	1,350	Carbon Steel/ Flat Roof
40	Empty (Former Castor Oil)	5,000	Carbon Steel/ Cone Roof
42	AA USP	5,000	Carbon Steel/ Cone Roof
44	Crystal Oil	5,000	Carbon Steel/ Cone Roof
78	CP Oil	25,000	Carbon Steel/ Cone Roof
288	Crystal Oil	6,008	Carbon Steel/ Cone Roof
289	Castor Oil	3,768	Carbon Steel/ Cone Roof

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of sulfuric acid; the remainder of the materials stored in this building are not categorized as hazardous substances.

**9. AST Area 9 – Building 41 Tanks (AOC-1-J)**

Building 41 Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
155	50% Liquid Caustic	1,763	Carbon Steel/ Flat Roof
239	Caustic	1,267	Carbon Steel/ Flat Roof
163	Castor Wax	4,000	Carbon Steel/ Flat Roof
164	Castor Wax	4,000	Carbon Steel/ Flat Roof

Castor wax is not categorized as a hazardous material. The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of caustic.

**10. AST Area 10 – Building 6A Tanks (AOC-1-K)**

Building 6A Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
Unknown	Empty – Former Isocyanatobenzene	1,560	Carbon Steel
Unknown	Empty – Former Methylene Diphenyl Diisocyanate (MDI)	1,560	Carbon Steel
Unknown	Empty – Former Bis(2-Ethylhexyl) Ester	1,560	Carbon Steel
Unknown	Empty – Former Toluene Diisocyanate (TDI)	1,560	Carbon Steel

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of the hazardous substances in AST Area 10.

**11. AST Area 11 – Building P-3 Tank (AOC-1-L)**

Building P-3 Tank			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
P-3	Glycol	1,500	Carbon Steel

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of glycol.

**12. AST Area 12 – Building P-4 Tank (AOC-1-M)**

Building P-3 Tank			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
P-4	Glycol	1,500	Carbon Steel

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of glycol.

**13. AST Area 13 – Two Tank Dikes Outside Building 28 (AOC-1-N)**

The two contiguous concrete dikes are located immediately northeast of Building 28. The first dike contains four 1,500-gallon metal tanks. One tank contains No. 2 fuel oil, while the other three tanks are currently empty. These tanks formerly contained alcohols. The tank storage area is approximately 310 square feet in area.

The second dike is presently empty. According to facility personnel, this dike historically contained three ASTs (the volume is unknown) that contained alcohols. Discolored standing water was observed inside this dike.

According to facility personnel, the tanks were present at each diked location since the early days of operation and the concrete dikes were built around the tanks in the early 1990s as part of the facility's DPCC Program. The total area within the two dikes is approximately 565 square feet in area.

CasChem proposes that three soil borings be advanced immediately outside of each side of the diked storage area in accordance with NJAC 7:26E-3.9, with one sample collected from each boring at a depth of 0-6" below grade and be analyzed for TPHC, Priority Pollutant Volatile Organic Compounds with a library search of 10 tentatively identified compounds (PP VOC+10), PP Acid Extractable Compounds with a library search of 10 tentatively identified compounds (AEC+10) and pH. The fourth side of the tank storage area is bounded by the wall of Building 28.

**14. AST Area 14 - Former Sebacic Acid Process Area (AOC-1-P)**

Sebacic Acid Process Area Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
804	Recycled Diluent Oil	23,500	Carbon Steel/ Flat Roof
820	Fatty Acids	23,000	Carbon Steel/ Flat Roof
802	Sodium Hydroxide	7,500	Carbon Steel/ Cone Roof
803	Sodium Hydroxide	7,500	Carbon Steel/ Cone Roof
808	2-Octanone	30,000	Carbon Steel/ Cone Roof
809	2-Octanol	30,000	Carbon Steel/ Cone Roof
819	Light Organic	30,000	Carbon Steel/ Cone Roof
822	Raw C8	40,000	Carbon Steel/ Cone Roof

The Sebacic Acid Process Area is an elevated concrete platform with finished floor built approximately 4 feet above grade. The hazardous materials that were handled at the Sebacic Acid Process Area are Recycled Diluent Oil, Sodium Hydroxide, 2-Octanol, and Light Organic. CasChem personnel indicated that the Sebacic Acid Process Area was constructed sometime between 1998 and 1999, with operations commencing in 1999. The Sebacic Acid Process Area was operated at a limited mode, with all the operations fully terminated in 2001. This area includes three lift stations, each containing an in-ground sump. All three sumps discharge into the onsite Wastewater Treatment Plant. During the site inspection, each sump contained residual sludge and viscous materials, and, as a result, visual inspection of the interior surfaces could not be performed. The concrete floor within the unused Sebacic Acid Process Area was intact.

The current location of the Sebacis Acid Process Area corresponds to the location of former Buildings 5, 7, and 8 and a portion of Building 9. Therefore, investigation proposed in Appendix 15 will address any concerns regarding former use of the Sebacic Acid Process Area.

**15. AST Area 15 - Building 39 (AOC-1-Q)**

Building 39 Tanks			
Tank ID No.	Product Stored	Capacity (Gallons)	Tank Material/Type
D	No. 1 Imported Castor Oil	650,000	Carbon Steel/ Cone Roof
E	No. 1 Imported Castor Oil	650,000	Carbon Steel/ Cone Roof



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None of the current tanks in Building 39 are used to store hazardous substance. According to facility personnel and as was confirmed during review of historical records, this area was always used for storage of castor oil with no hazardous substances stored in this area. No further investigation is proposed regarding AOC-1-Q.



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**APPENDIX 5**

**UNDERGROUND STORAGE TANKS (AOC-2)**



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Due to the historical presence of the alcohol USTs, a geophysical survey is recommended at the Building 38. This survey is necessary to determine whether the USTs are present beneath the building floor. Based upon the results of the geophysical survey, a soil sampling program may be developed to determine if soils were impacted.

The remaining USTs were closed between 1983 and 1985. The only UST closure documentation that could be located was for the two 550-gallon Waste Xylene/ Urethane Waste USTs (AOC-2-E) and one 6,000-gallon Waste Xylene/Urethane Waste UST (AOC-2-F). A summary of remedial investigation activities associated with these three tanks is provided in Appendix 24.

The closure documentation pertaining to the remaining tanks could not be located. However, Mr. Seth Levine, P.E., Senior Director-Regulatory Affairs with Cambrex Corporation, was interviewed to obtain information regarding the closed USTs. Mr. Levine stated that he was present onsite at the time of the UST closure, and that the USTs were closed via abandonment in-place or permanent removal in compliance with the NJDEP's regulations that existed at the time of closure. Mr. Levine reported that, following the closure of the USTs and the associated site assessment, all USTs were delisted from the NJDEP UST database. An Affidavit signed by Mr. Levine is included in this appendix.

Because the USTs were delisted from the NJDEP UST database, no further investigation is proposed.



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AFFIDAVIT AND CERTIFICATION

I, Seth Levine, was present at the CasChem Inc. facility at 40 Avenue A, Bayonne, New Jersey onsite at the time of the closure of the underground storage tanks (USTs) listed below. I affirm that the USTs listed below were closed via abandonment in-place or permanent removal, and a site assessment was conducted, all in compliance with New Jersey Department of Environmental Protection regulations that existed at the time of the closure and site assessment. I affirm that, following the closure of the USTs and the associated site assessment, the USTs listed below delisted from the NJDEP UST database.

Size of Tank (Gallons)	Tank Contents	Location	AOC
Two 550	Formerly Gasoline (Tanks were removed in 1983)	East Of Building 2A	2-A
One 550	Formerly Gasoline (Tank abandoned in-place in 1991)	South corner of Northwest Tank Farm	2-B
One 110	Formerly Gasoline (Tank abandoned in-place in 1991)	South corner outside Boiler Plant	2-C
Two 6,000	Formerly Toluene (Tanks abandoned in-place in 1984)	Approx. 23 feet due south of tanks 225-229 (Northwest Tank Farm)	2-D
15,000	Formerly Heptane (Tank abandoned in-place in 1985)	Approx. 10 feet due west of Building 4	2-G
Two 6,000	Formerly Xylene (Tanks abandoned in-place in 1985)	South corner of Building 4	2-H
Two 6,000	Formerly Naptha (Tanks abandoned in-place in 1985)	Immediately west of Building 21	2-J
10,000 (rail car)	Formerly Fuel Oil (Tank abandoned in-place in 1985)	Immediately north of Building 4A	2-K
1,000	Formerly Fuel Oil (Tank removed in 1985)	Grass area, west corner outside Building P1	2-L
10,000 (rail car)	Formerly Dioctyl Adipate/Fuel Oil (Tank abandoned in-place in 1985)	Approximately 20 feet east of Building P2	2-M
1,000	Formerly Steam Condensate (Tank abandoned in-place in 1985)	East corner outside Boiler Plant	2-N
Six 2,500 (volume is estimated)	Formerly Alcohols	Approximetly 15 feet due west of Building 25	2-P

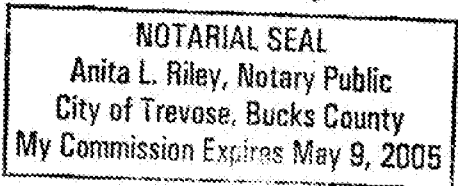
I certify under penalty of law that I have personally examined and am familiar with the information presented above and affirmed in the above affidavit, and all attached documents, and based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information, and that I am committing a crime of the fourth degree if I make a written false statement, which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Typed/Printed Name: Seth Levine Title: Senior Director-Regulatory Affairs, Cambrex Corporation

Signature Seth Levine Date 6/2/04

Sworn to and Subscribed Before Me on this 2nd

Date of June 10 2004  
Anita L. Riley  
 Notary



Review of the historical records indicated that three silos were present approximately five feet north of the current truck scale (i.e., immediately south of the western end of the Northwest Tank Farm). Each silo was 200,000-gallons in volume. Two silos contained Polyethylene 629 and the third silo contained Epolene E14. These two materials are known plasticizers.

The investigation proposed in Appendix 15 will address any concerns regarding potential discharge of the plasticizers from the former silos.



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**APPENDIX 7**  
**RAIL CARS (AOC-4)**



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Railroad spurs (AOC-4) traverse the southern and front ends of the Bayside block as well as the southern end of the Eastside block of the site. At the present time, rail transfer areas are not utilized. A rail tank car formerly operated onsite and was stationed to the south of Building 4; this tank car functioned as an AST. The tank car was removed from service, emptied, cleaned, and disposed off site. According to facility personnel, the railroad was used for transportation/storage of No. 6 Fuel Oil, unspecified alcohols, Polyethylene 629, castor oil, Toluene Diisocyanate (TDI), brine (water and glycol) and waxes. The railroad ties are bedded into granular soils, surfaced with gravelly material.

Buildings 25, 26, 28 and 34 have overhead doors at the back of each building, facing the railroad lines. In addition, old signs "Spot Dome" were found fastened to the chain link fence that extends parallel to the railroad tracks, at the locations against the overhead doors of the buildings 26, 28, 34, 10 and 4, possibly indicating the former unloading locations. Facility personnel stated that washing of the railroad car took place immediately south of the current Building 38A.

To confirm that a release from the operation or washing of railroad cars into the subsurface soils did not occur, CasChem proposes that one soil boring be advanced along the railroad siding immediately outside Buildings 38A, 4, 10, 25, 26, 28 and 34 in accordance with NJAC 7:26E-3.9(b), for a total of seven borings. One sample will be collected from each boring at a depth determined by field screening and will be analyzed for PP VOC+10, PP Base/Neutral Compounds with a library search of 15 tentatively identified compounds (BNC+15), PP AEC+10, total petroleum hydrocarbon compounds (TPH), and USEPA Target Analyte List (TAL) Metals. One groundwater sample will be collected from each boring and will be analyzed for a short list of Groundwater Specific compounds (GSC)-Alcohols (Methanol, Ethanol, n-Propyl Alcohol, Isobutyl Alcohol, Isopropyl Alcohol, n-Butyl Alcohol, and 2-Butanol), as defined in NJAC 7:9-6.

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**APPENDIX 8**

**LOADING/UNLOADING AND TRANSFER AREAS (AOC-5)**



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CasChem received and shipped all of its goods by truck and, as of the property transfer in November 2003, did not use any rail loading area(s).

#### Newark Bay (AOC-5-A)

Crude castor oil, a non-hazardous substance, is delivered by barges and received at the facility's marine transfer (i.e., mooring) area. The mooring dock consists of a bulkhead with Warehouse 37 extending approximately 110 feet at its northern end. The transfer loading area is covered by asphalt pavement with no drainage system discharging into Newark Bay. Localized deterioration of the asphalt pavement was observed at the southern end of the bulkhead. Since no hazardous materials are received or handled at this location, no further investigation is proposed for this area.

Other raw materials are received by tank trucks and by panel truck containing drums, carboys, cans and bags. Finished products are shipped overland by tank trucks in drums, pails, bags, and cans. These loading/unloading and transfer areas are discussed individually below.

#### Central Tanker Loading/Unloading Area (AOC-5-B)

The central tanker loading/unloading area (AOC-5-B) is located immediately northwest of Building 26. This truck loading/unloading area occupies approximately 230 square feet and is covered by concrete pavement with expansion joints. The area is sloped toward the building, with trench drains at the base of the ramps. The stormwater drains present within this loading dock are routed into the onsite wastewater treatment plant. No stains were observed at the loading area. Based upon review of the available historical site plans (1944 and 1949) and interview with facility personnel, there is no indication that this truck loading/unloading was paved during the previous years. The materials handled within this loading/unloading area consist principally of No. 2 fuel oil, castor oil, caustic and Sodium Hydroxide (during the previous years of Sodium Hydroxide AST operation). In addition, the elevated platform of Building 27, contiguous to Building 26, is used for storage of Acetic Acid (discussed in Appendix 9).

Review of the 1944 and 1949 General Maps for the Baker Castor Oil Company indicated the former presence of a truck scale with an approximate area of 440 square feet, located 30 feet west of the current truck loading/unloading area northwest of Building 26. Further review of the historical site plans revealed that the area surrounding this former truck scale was unpaved. In addition, Buildings 26, 27 and 34 are equipped with a loading concrete platform, which also includes three hydraulic lifts.

To confirm these observations, CasChem proposes collection of one soil sample at the current central tanker loading/unloading area and one sample at the approximate location of the former truck scale, from zero to six inches below ground surface, in accordance with NJAC 7:26E-3.9(b). Each sample will be analyzed for PP VOC+10, TPH, TAL Metals, and pH.



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**Truck Transfer Area North of Buildings 24 and 38 (AOC-5-C)**

This area is used for transfer of hazardous substances and castor oil from tank trucks into storage/process tanks. This truck transfer area is capped by intact concrete. No stains were observed at the loading areas north of Buildings 24 and 38. Based upon review of the available historical site plans (1944 and 1949), the area abutting the northern wall of the Buildings 24 and 38 was covered by concrete pavement. No further investigation is proposed for these areas.

**Truck Transfer Area South of Buildings 41 (AOC-5-D)**

This area is used for transfer of hazardous substances from tank trucks into corresponding storage/process tanks. This truck transfer area is covered by intact concrete. No stains were observed at the loading area south of Buildings 41. Based upon review of the available historical site plans (1944 and 1949), the area abutting the southern wall of Buildings 41 was covered by asphalt pavement. No further investigation is proposed for this area.

**Truck Transfer Area North of Buildings 37 (AOC-5-E)**

This area is used for transfer of hazardous substances from tank trucks into corresponding storage/process tanks. This truck transfer area is covered by intact concrete pavement. No stains were observed at the loading area south of Buildings 37. Based upon review of the available historical site plans (1944 and 1949), the area abutting the northern wall of the Buildings 41 was covered by asphalt pavement. No further investigation is proposed for this area.

**Truck Transfer Area South of Northwest Yard Tank Farm (AOC-5-F)**

This area is used for transfer of hazardous substances and castor oils from tank trucks into corresponding storage tanks. This truck transfer area is covered by intact concrete pavement. No stains were observed at this loading area. Based upon review of the available historical site plans (1944 and 1949), the area abutting the southern end of the Northwest Yard Tank Farm covered by concrete pavement.

In addition, a truck scale is present to the south of this tank farm. The truck scale was reportedly built between 1997 and 1999 and includes a perimeter in-ground trench to collect drips and spills from trucks. A visual inspection of the in-ground trench revealed that the concrete-lined trench was intact. No further investigation is proposed for this area.

**Truck Transfer Area East-Northeast of Building 39 (AOC-5-G)**

This area is used principally for unloading of castor oils from tank trucks into corresponding storage tanks or process vessels. This truck transfer area is capped by concrete; several cracks were observed in the concrete. A storm drain at the base of the unloading area discharges into Newark Bay. No stains were observed at the loading area. The unloading area is currently capped by intact asphalt pavement. Based upon review of the available historical site plans (1944 and 1949) and interview with facility personnel, it is unknown whether this truck unloading area was paved during the previous years. In addition, Building 39 includes a hydraulic lift.



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Due to the presence of hydraulic lifts and because there is no indication that this truck transfer area was historically paved, CasChem proposes collection of one soil sample from zero to six inches below ground surface at the base of the unloading area in accordance with NJAC 7:26E-3.9(b), and analysis of the sample for PP VOC+10 and TPHC.

*Loading Dock South of Building 4A (AOC-5-H)*

This area is used for handling of miscellaneous hazardous and non-hazardous substances. This loading area is capped by intact concrete pavement. In addition, the loading dock of Building 4A includes two hydraulic lifts and one hydraulic trash compactor. No stains were observed at this loading area.

Review of Sanborn maps revealed that from the early 1940s through the early 2000s, the area corresponding to the current loading dock and paved area to the west of Building 7A consisted of three interconnected buildings (former buildings 4, 5 and 6). One of the areas inside the former buildings was identified as "alcohol and oil storage". The investigation proposed in Appendix 15 regarding the former Buildings 4, 5 and 6 will address any concerns regarding this loading dock.

*Unloading Dock Outside Buildings 1A and 2A (AOC-5-I)*

This area is used for delivery by truck of raw materials in drums and pails. This loading area is capped by intact concrete pavement. Building 2A has two hydraulic lifts. No stains were observed at this loading area. No further investigation is proposed for this area.

*Unloading Area Outside Building P6A (AOC-5-K)*

This area is used for delivery by truck of raw materials in drums and pails. This loading area is capped by intact concrete. There are no hydraulic lifts at this loading dock. No stains were observed at this loading area. No further investigation is proposed for this area.

*Unloading Area South Of Building 2A (AOC-5-L)*

This area was historically used for delivery and unloading by railroad car of raw materials in drums and pails. According to facility personnel, the principal hazardous materials unloaded and staged in this area contained Toluene, Xylene, Ethanol, alcohols and oils and varnishes/polymers that were used as intermediate chemicals for polyurethane coatings (MDI, TDI, Isocyanatobenzene, etc.). The railroad tracks running along the southern border of the Building 2A are outside the property limits. The area located immediately south of Building 2A is contiguous to the railroad currently capped with intact asphalt; however, based on review of the historical site maps and interviews with facility personnel, there is no indication that this area was historically paved. This unloading area is approximately 500 square feet in area.



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To confirm these observations, CasChem proposes that one soil boring be advanced at the former unloading area in accordance with NJAC 7:26E-3.9(b). One soil sample will be collected from the boring at a depth determined by field screening and analyzed for PP VOC+10, PP BNC+15, PP AEC+10, TPH, and TAL Metals. One groundwater sample will be collected from the boring and analyzed for the short list of GSC-alcohols in accordance with NJAC 7:9-6.

*Loading/Unloading Area Outside Sebacic Acid Process Area (AOC-5-M)*

A loading/unloading area is located immediately contiguous to the eastern end of the unused Sebacic Acid Process Area. This area was formerly used for delivery by truck of raw materials in drums and pails. This loading area is capped by intact concrete and has one hydraulic lift. This end of the Sebacic Acid Process Area corresponds to the former location of Building 2. Investigation proposed in Appendix 15 regarding the former Building 2 will address potential contamination associated with releases from the Sebacic Acid Process Area loading/unloading area.



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**APPENDIX 9**

**BULK STORAGE TANKS AND APPURTENANCES -  
PIPING, ABOVEGROUND AND BELOW GROUND  
PUMPING STATIONS, SUMPS AND PITS  
(AOC-6 through AOC-8)**



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## PIPING (AOC-6)

All in-facility piping used for delivery/conveyance of non-processed raw materials and hazardous substances is above grade. The pipes are laid out in elevated overhead pipe racks and across roadways to minimize the chance of vehicular collision. Based upon a discussion with facility personnel and review of historical records, there is no indication that non-processed conveyance piping associated with bulk storage tanks has ever been installed underground.

No further investigation is proposed regarding the piping associated with bulk storage tanks.

## PUMPING STATIONS (AOC-7)

### Diesel Fuel AST (AOC-7-A)

An emergency generator is present in the alley between Buildings 10 and 26. The generator is supplied by an integral self-contained diesel fuel AST, placed beneath the generator as one unit. This area is covered by intact asphalt pavement. No stains were observed. No further investigation is proposed for the diesel fuel AST and the dispenser associated with the emergency generator.

### Castor Oil Distribution Pumps (AOC-7-B)

Individual tanks that are used for distribution of castor oil or other non-hazardous materials are provided with remotely activated pumps via the Programmed Logic Control (PLC) system operated from the control rooms inside these buildings. The pump controls are accessible in the event of leaks. The pumps are positioned on ground surface and are provided with easy access in the event of leakage. No further investigation is proposed for the pumps associated with non-hazardous materials bulk storage tanks.

### Sodium Hydroxide and No. 2 Fuel Oil Distribution Pumps (AOC-7-C)

Two 8,700-gallon No. 2 Fuel Oil ASTs and two 8,700-gallon Sodium Hydroxide ASTs are present in the basement of the Building 26. Transfer pumps associated with each tank are fastened to the concrete floor near each corresponding tank. The concrete floor near the base of the pumps was intact; however, there is a concrete-lined containment trench along the length of the basement. The trench discharges into the onsite Wastewater Treatment Plant. During the site inspection, the trench contained turbid water and, as such, was inaccessible for an inspection.

As indicated in the Appendix 4, CasChem proposes to clean the conveyance trench near the No. 2 fuel and Sodium Hydroxide tanks in preparation for visual inspection. Following the cleaning, the trench will be visually inspected to document the structural condition of the trench surfaces.



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## SUMPS AND PITS (AOC-8)

### Northwest Tank Farm (AOC-8-A)

There are four containment sumps associated with castor oil tanks inside the secondary containment for the Northwest Tank Farm. The sumps are used to collect accidental spills resulting from the bulk storage tanks. The sumps are located in the immediate vicinity of the tanks and are not used to collect spills of any hazardous materials. No further investigation is proposed for the containment sumps associated with non-hazardous bulk storage tanks.

### Northeast Tank Farm (AOC-8-B)

One sump is located at the east end of this tank farm, near the empty tanks that formerly held castor oil and recycled Diluent Oil. The Tank 299 (former Diluent Oil) is located outside the eastern corner of Building 9. The investigation proposed in Appendix 15 will address any concerns regarding potential discharges of Diluent Oil.

No additional sumps or pits associated with storage tanks are known to presently exist or historically existed onsite.



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**APPENDIX 10**

**STORAGE AND STAGING AREAS  
(AOC-9 through AOC-14)**



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Designated current and historical storage and staging areas include one storage pad (AOC-9); dry warehouses (AOC-10), exterior storage areas (AOC-11); dumpsters (AOC-12); chemical storage cabinets and closets (AOC-13), waste storage areas (AOC-14) and compressed gas storage areas (AOC-15). In addition, the majority of the chemicals are handled or were handled inside the individual buildings. Hazardous materials storage/handling areas are discussed in Appendix 15.

Bulk raw materials and processed castor oils are stored in the AST farms described in Appendix 4; investigations were proposed for some of the AST farm areas.

### **STORAGE PADS (AOC-9)**

One storage pad is present to the south of the former cooling tower's location. The pad is used for storage of one 20-gallon plastic drum of Phosphoric Acid. No stains were observed in this area, and the concrete pad as well as the area abutting the pad was observed to be intact during the site inspection. There was no history of spills or releases in this area. No further investigation is proposed for the Phosphoric Acid storage pad.

### **DRY WAREHOUSES (AOC-10)**

Drums and totes of raw materials are staged in the Warehouses 32, 36 and 37. Materials were staged neatly, and no spillage was observed. The concrete floor was observed to be intact during the site inspection and no floor drains are present or known to be present in the past in any of the warehouse storage areas. No further investigation is proposed regarding the dry warehouses.

### **EXTERIOR STORAGE AREAS (AOC-11)**

Designated exterior storage and staging areas are as follows.

#### **Recovered Acetic Acid (AOC-11-A)**

Acetic Acid is stored in 55-gallon drums on the elevated platform immediately north of Building 27. The drums are kept on wooden pallets without secondary containment. A stormwater inlet is located approximately 20 feet east of the Acetic Acid storage area. Investigation proposed in Appendix 8 for the AOC-5-B will address any concerns regarding potential discharge of Acetic Acid.

#### **Spent Nickel (AOC-11-B)**

Spent Nickel is stored in 55-gallon drums immediately north of Warehouse 37. The drums are staged on paved intact ground surface. Review of the historical site plans revealed that the area abutting the northern end of Warehouse 37 was historically paved. A stormwater inlet - the only potential pathway of a release - is located approximately 25 feet north of Spent Nickel drum storage area. Investigation proposed in Appendix 11 for AOC-21 (Stormwater) for evaluation of the underground piping will address any concerns regarding potential discharges of nickel.



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### Castor Oil Staging Areas (AOC-11-C)

Additional exterior storage areas include 55-gallon drums on wooden pallets holding castor oil or castor oil's derivatives. Castor oil is not considered a hazardous substance. No further investigation is proposed regarding the exterior castor oil 55-gallon drums.

### Historical Drum Storage Area East Of Warehouse 32 (AOC-11-D)

Earth Tech was informed that prior to the 1990s, drums and containers storing Plastic Bufferite used by the wax department were staged on the ground surface outside the eastern wall of Warehouse 32. This area was observed to be paved and unstained during the site visit. Plastic Bufferite and its constituents are not categorized as hazardous materials and, as such, there would be no impact to soil if a release has occurred. No further investigation is proposed regarding AOC-11-D.

## **DUMPSTERS (AOC-12)**

### West Of Office Trailer (AOC-12-A)

Two 30-yard roll-off containers were observed immediately west of the Office Trailer. No stains were observed. According to facility personnel, the containers were always used to store municipal trash (i.e., cardboard and plant refuse) only and no oils or hazardous substances were discarded into the containers. No further investigation is proposed regarding AOC-12-A.

### Scrap Metal Dumpster (AOC-12-B)

Scrap metal is generated throughout the facility, including electrical conduit, piping, and machinery. The metal was staged in a separate 30-yard roll-off container approximately 25 feet north of Building 3, pending recycling. The paved ground surface beneath the container was intact, and no stains were observed. There was no evidence of a discharge from the scrap metal container. No further investigation is proposed regarding AOC-12-B.

### Filter Press Cake Dumpster (AOC-12-C)

Filter press cake is generated at the facility as a result of processing of castor oil. The filter press cake was staged in a separate 20 cubic yard roll-off container immediately northeast of Building 3 pending off-site disposal. The paved ground surface beneath the container was intact, and no stains were observed. There was no evidence of a discharge from the container. The filter press cake is disposed off-site as non-hazardous waste. The container was covered by an impermeable tent, to prevent rainwater from entering the container. No further investigation is proposed regarding AOC-12-C.



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*East Of Tank D (AOC-12-D)*

One dumpster was observed immediately east of Tank D. No stains were observed. According to facility personnel, the dumpster was always used to store municipal trash only and no oils or hazardous substances were discarded into the dumpster. The concrete pavement beneath the dumpster was intact, and no stains were observed. No further investigation is proposed regarding AOC-12-D.

*South Of Northwest Tank Farm (AOC-12-E)*

Three dumpsters were observed immediately south of the Northwest Tank Farm. No stains were observed. According to facility personnel, the dumpsters were always used to store municipal trash only and no oils or hazardous substances were discarded into the dumpster. The concrete pad beneath the dumpsters was intact, and no stains were observed. No further investigation is proposed regarding AOC-12-E.

*Near Wastewater Treatment Plant (AOC-12-F)*

Two dumpsters were observed immediately south of the Northwest Tank Farm. No stains were observed. According to facility personnel, the dumpsters were always used to store municipal trash generated as a result of the WWTP operation and no oils or hazardous substances were discarded into the dumpster. The concrete pad beneath the dumpsters was intact, and no stains were observed. No further investigation is proposed regarding AOC-11-F.

*West Of Building 2A (AOC-12-G)*

One dumpster was observed immediately west of Building 2A on the Eastside block. No stains were observed. According to facility personnel, the dumpster was always used to store municipal trash only and no oils or hazardous substances were discarded into the dumpster. The concrete pavement beneath the dumpster was intact, and no stains were observed. No further investigation is proposed regarding the AOC-12-G.

*West Of Building P2 (AOC-12-H)*

One dumpster was observed immediately west of Building P2 on the Eastside block. No stains were observed. According to facility personnel, the dumpster was always used to store municipal trash only and no oils or hazardous substances were discarded into the dumpster. The concrete ground surface beneath the dumpster was intact, and no stains were observed. No further investigation is proposed regarding the AOC-12-H.



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### Loading Dock Of Building 4A (AOC-12-D)

One dumpster with a hydraulic compactor was observed at the loading dock of Buildings 3A and 4A. No stains were observed. Stormwater inlets are present in the vicinity of the loading dock. Review of the historical records revealed that from the early 1940s through the early 2000s, the area corresponding to the current loading dock and paved area to the west of Building 7A consisted of the interconnected Buildings 4, 5 and 6, including an area identified as "alcohol and oil storage". The investigation proposed in Appendix 15 for the former Buildings 4, 5 and 6 will address any concerns regarding the hydraulic trash compactor.

## **CHEMICAL STORAGE CABINETS AND CLOSETS (AOC-13)**

### North-Northwest Of Building 4 (AOC-13-A)

Three fire-rated metal chemical storage cabinet (AOC-13-A) are present at the northern-northwestern corner outside Building 4. The cabinets are used for temporary storage of small quantities of various chemicals used in routine maintenance activities (such as kerosene, gasoline, oils and paints). No evidence of spillage was observed on the ground surface near the cabinets. No further investigation is proposed regarding the chemical storage cabinet outside Building 4.

### Inside Building 3 (AOC-13-B)

One fire-rated metal chemical storage cabinet (AOC-13-B) is present inside Building 3. The cabinet is used for storage of small quantities of flammable materials (such as oils, gasoline and paints). The cabinet is locked and the chemicals are stored neatly. There was no history of spills or releases from this cabinet. No further investigation is proposed regarding the chemical storage cabinet in Building 3.

### Inside Building 26 (AOC-13-C)

Two fire-rated metal chemical storage cabinets (AOC-13-C) are present in the penthouse of Building 26. The cabinets are used for temporary storage of small quantities of flammable materials (such as oils, gasoline and paints). The cabinets are locked at all times and the chemicals are stored neatly. There was no history of spills or releases from these cabinets. No further investigation is proposed regarding the chemical storage cabinets in Building 26.

### Inside Building 1A (AOC-13-D)

Fire-rated metal chemical storage cabinets (AOC-13-D) are present throughout laboratories of Building 1A. The cabinets are used for temporary storage of small quantities of flammable materials used in the laboratories. The cabinets are locked at all times and the chemicals are stored neatly. There was no history of spills or releases from these cabinets. No further investigation is proposed regarding the chemical storage cabinets in Building 1A.



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## WASTE STORAGE AREAS (AOC-14)

### Building 3 (AOC-14-A)

Building 3 is a central area where hazardous wastes are stored for 90 days or less pending off-site disposal. The building was constructed as secondary containment. There is a floor trench drain extending across the length of the building; the drain is reportedly sealed. Based upon review of Sanborn maps, the western end of this building – identified as “Engine Room” and “Dry Room” – was present onsite since the early 1900s, while the area abutting the eastern end of this building appeared to be unpaved. During the later years, the building was extended and was identified as “Mill Building” and later as “Extraction Building”. Miscellaneous hazardous materials (e.g., xylene) were used to extract castor beans in this building. The building floor space area is approximately 3,500 square feet.

**Due to the historical presence of the hazardous materials storage and processing operations inside the Building 3 and a sealed floor drain, CasChem proposes that four soil borings be advanced inside the Building 3 in accordance with NJAC 7:26E. One sample will be collected from each boring at a depth corresponding to the invert of the floor trench drain (estimated at one to two feet below grade) and will be analyzed for USEPA Priority Pollutant Compounds with a library search of 40 tentatively identified compounds (PP+40).**

### Historical Waste Storage Area East Of Building 3 (AOC-14-B)

Prior to the early 1990s, drums and containers storing hazardous wastes were staged on the ground surface outside the eastern wall of Building 3. The estimated area of the former hazardous waste storage area is approximately 830 square feet. This area was observed to be paved and unstained during the site visit; however, from the review of the photographs it appears that during the mid-1940s, this area was unpaved.

**Due to the historical presence of the exterior hazardous waste storage area, CasChem proposes that one soil sample be collected in accordance with NJAC 7:26E. The soil sample will be collected from a depth of zero to six inches below ground surface and will be analyzed for PP+40.**

### Historical Drum Storage Area At Northern Corner Of Eastside Block (AOC-14-C)

Review of aerial photographs for the subject property (Appendix 22) revealed a storage area, consisting of multiple drums and totes, was present at the Eastside block immediately northwest of Laboratory and Sampling Department from 1978 through the early 1990s. From the review of the photographs it appears that this storage areas was unpaved. The storage area encompassed an area of approximately 6,750 SF of land.

**Due to the historical presence of the exterior drum and pail storage area, CasChem proposes collection of eight soil soil samples from the former drum and pail storage area in accordance with NJAC 7:26E. The samples will be collected from a depth of zero to six inches below ground surface and will be analyzed for PP+40.**



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**Historical Drum Storage Area Southwest Of Building 7A (AOC-14-D)**

Review of aerial photographs for the subject property (Appendix 22) indicated that a drum storage area was present immediately southwest of Building 7A of the Eastside block. This drum storage area was present from the early 1960s through the mid-1970s. This area is currently capped with intact asphalt pavement; however, based upon review of the aerial photographs, it appears that prior to the early 1980s, this storage area was unpaved. This historical drum storage area encompassed an area of approximately 2,500 square feet. Interviews with facility personnel revealed that this area was also used for waste reconditioning and treatment.

**To confirm these observations, CasChem proposes that three soil borings be advanced at the former waste treatment area in accordance with NJAC 7:26E. One soil sample will be collected from each boring at a depth determined by field screening and will be analyzed for PP+40.**

**Historical Hazardous Waste Storage Area East of Building 1A (AOC-14-E)**

Review of the historical site maps for the subject property revealed that a hazardous waste storage area was present contiguous to the eastern wall of Building 1A of the Eastside block. This area is currently paved; however, based upon the review of the aerial photographs and interview with facility personnel, there is no indication that this storage areas was historically paved. This storage area encompassed an area of approximately 600 square feet.

**Due to the historical presence of the exterior hazardous waste storage area, CasChem proposes that one soil boring be advanced at the former drum storage area in accordance with NJAC 7:26E. One sample will be collected from the boring at a depth determined by field screening and will be analyzed for PP+40.**



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**APPENDIX 11**  
**DRAINAGE SYSTEMS**  
**(AOC-15 through AOC-21)**



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AOCs related to industrial wastewater, sanitary sewer, stormwater and non-contact cooling water discharges are discussed separately below.

## WASTEWATER

Sanitary (non-industrial) waste is discharged directly into the municipal system, owned and operated by Passaic Valley Sewerage Commissioners (PVSC). Direct discharges of sanitary wastes do not require permits.

Process wastewater is discharged from the indoor production areas and laboratories to drains and trenches. From the drums/trenches, the process wastewater is routed to the onsite WWTP via a network of in-ground conveyance trenches and underground pipes. The floor drains and trenches receive wastewater or washwater from various forms of processing activities. After sufficient pre-treatment, the wastewater discharges into a POTW, PVSC. The onsite WWTP consists of an in-ground equalization sump pit, neutralization tanks with pH adjustment, polish tanks, air stripper and liquid mixing tanks. The in-ground sump pit is the only underground structure as part of the historical or current operations of the WWTP; the other WWTP units were always above grade. No evidence of spillage was observed in the vicinity of the WWTP, and the concrete floor surrounding the aboveground units of the WWTP was intact. This process wastewater discharge is permitted under PVSC Industrial User Permit No. 36200001. Industrial and laboratory wastewater from the Eastside block is collected in two intermediate aboveground equalization basins and is pumped to the onsite WWTP via overhead pipe bridges.

### Floor Drains From Processing Operations (AOC-15)

#### Building 39 (AOC-15-A)

Two floor drains that receive process wastewater, are located inside Building 39. This floor drain ties into a trench drain located immediately north outside Building 37, which ultimately discharges into the onsite WWTP.

#### Building 27 (AOC-15-B)

Two floor drains were observed in the abandoned laboratory, located in the basement of Building 27. Discolored water was observed on top of the floor drains.

#### Building 28 (AOC-15-C)

Multiple floor drains at the processing areas were observed throughout Building 28. These floor drains discharge to the onsite WWTP.

#### Building 10 (AOC-15-D)

One floor drain is present in the Boiler Plant (Building 10); the drain appeared to be sealed.



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### Buildings P-2, P-3 and P-4 (AOC-15-E)

Review of the drawing provided by CasChem, titled Wastewater System Modification Project, dated September 1990, revealed that contact water floor drains were sealed at Buildings P-2, P-3 and P-4.

Due to the former and current discharges of the processed wastewater through the floor drains, CasChem proposes review of the existing video tape documenting the results of the video survey of the process waste piping system that was conducted by National Water Main Cleaning Co. in August 1999. At locations where structural or hydraulic defects in the piping system are noted, a sampling program will be developed to address the areas of potential exfiltration, if any.

CasChem also proposes completion of a new assessment of piping system integrity via:

- a video survey of a statistically representative set of floor drains and piping within the buildings, and
- a video survey of the major discharge lines,

in accordance with NJAC 7:26E-3.9(d). The objective of the video surveys are to detect structural or hydraulic defects that may have resulted in exfiltration from the piping to the soils. If a video inspection cannot be performed due to lack of clean-outs or other access points, to significant obstructions in the pipes, or to sealed drains, representative soil samples will be collected at a depth of below the expected invert of a given pipe as part of the Site Investigation activities.

### **Floor Trenches From Processing Operations (AOC-16)**

Wastewater diversion/conveyance floor trenches are present throughout the production and storage areas in Buildings 3, 9, 10, 24, 26, 28, 34, 38, 38-A, 39, 41, P-2, P-3, P-4, P-5, P-6, P-7, and P-6A. The drain trenches are also located throughout the unused Sebacic Acid Process Area. The floor trenches receive rinse water and washwater from processing operations and carry the flow into the WWTP. Some of the floor trenches were sealed. The majority of the trenches are covered by metal grating and, as such, could not be fully inspected for structural integrity. In addition, some of the trenches contained liquids or viscous materials, and, as such, could not be inspected for structural integrity. Staining was observed either inside or near some of the trenches.

CasChem proposes that all of the active process wastewater floor trenches be opened and cleaned. Following cleaning, the trenches will be visually inspected for the presence of defects that may have resulted in exfiltration of process wastewater into the subsurface soils. If the concrete trenches are intact, no further investigation will be necessary since the stains are surficial. If the concrete trenches are not intact, soil borings will be advanced adjacent to the trench in biased locations (one soil boring per 30 linear feet of stained area) in accordance with NJAC 7:26E-3.9(a)6. One soil sample will be collected from each boring at the depth of the trench invert and analyzed for PP VOC+10, PP BNC+15, PP AEC+10, TPH, and pH.

At the buildings where the floor trenches are sealed or otherwise inaccessible for a visual inspection, representative soil samples will be collected along the trench at a depth of below the bottom of a given trench. Soil borings will be advanced adjacent to the trench in biased locations (one soil boring per 30 linear feet of stained area) in accordance with NJAC 7:26E-3.9(a)6. One soil sample will be collected from each boring at the depth of the trench invert and analyzed for VOC+10, PP BNC+15, PP AEC+10, TPH, and pH.

#### **Pits and Vaults (AOC-17)**

##### **Building 10 (AOC-17-A)**

A square in-ground pit is located in Building 10. The pit collects boiler water, steam and condensation only and discharges the collected fluids into the onsite WWTP. The pit is concrete-lined. A visual inspection of the pit revealed that the pit being intact. No further investigation is proposed regarding the collection pit in Building 10.

##### **Vault South Of Building 4 (AOC-17-B)**

A large underground vault is present approximately 15 feet south of Building 4. The vault is located within a railroad siding and is covered by metal grating. The vault is used to contain spills and rainwater from the containment dikes at both of the Southeast Tank Farms, located to the west (Tanks E and D) and to the east (Tanks B and C) of the vault. Storage tanks B, C, D, and E were always used to store castor oil only. The drain valves associated with tanks B, C, D, and E are positioned in the in-ground square sumps in each of the corresponding containment dikes. The valves are opened manually to drain the accumulated castor oil and rainwater into the underground vault. When the vault approaches its full capacity, the vault is pumped out by hoses. The vault was installed recently as part of the facility DPCC program. Due to the fact that the vault is used to collect castor oil and rainwater only and no hazardous substances were ever emptied into the vault, no further investigation is proposed regarding the collection vault south of Building 4.

### Wastewater Treatment Pit (AOC-17-C)

A combined process wastewater treatment sump pit is located immediately west of Building 9. The pit is approximately 4 feet in diameter and 6 feet below finished grade and was installed during the earlier years of plant operation. According to facility personnel, prior to the early 1980s, the onsite WWTP was limited to pH adjustment and lime addition. After 1980, additional stages of treatment were added to the WWTP. Changes in the wastewater treatment process entailed modifications to the underground collection pit. Due to the continuous operation of the WWTP, cleaning of the pit to inspect for structural integrity is impractical.

**Due to the historical and present use of the below-grade process wastewater collection sump pit, CasChem proposes completion of one soil boring within two feet of the suspected downgradient side of the sump pit, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from the boring at a depth of two feet below the pit bottom (expected to be eight to nine feet below grade) and will be analyzed for PP+40.**

### Process Area Sinks (AOC-17-D)

Sinks that receive rinse water or washwater generated as a result of processing or laboratory activities are located throughout the laboratory area of Building 1A and Building P6A; sinks that are used for rinsing glassware and chemical bottles are labeled. The laboratory rooms within Building 1A were well maintained.

The laboratory is present on the second floor of the Building P6A. The activities in this laboratory were terminated circa 1997. All the rinse water from this laboratory was discharged via aboveground piping to one of the intermediate wastewater collection tanks prior to discharge onto the onsite WWTP.

No further investigation is proposed regarding the AOC-17-D.

### **Sumps (AOC-18)**

#### Sebacic Acid Process Area (AOC-18-A)

Three sumps are present in the unused Sebacic Acid Process Area. Some of these sumps serve as lift stations and are connected to transfer pumps. The contents of the sumps are piped via corresponding aboveground lines to the WWTP. All three sumps contained residual viscous or turbid liquids or sludge at the time of inspection and, as such, could not be inspected for structural integrity. The western end of the current Sebacic Acid Process Area was formerly occupied by part of Building 9; this section of Building 9 was formerly used for drum storage. The southern and eastern ends of the current Sebacic Acid Process Area were formerly occupied by Building 7 (Machine Shop). Investigation proposed in Appendix 15 for the historical buildings will address any concerns regarding potential discharges at the Sebacic Acid Process Area.



#### **Basement of Building 26 (AOC-18-B)**

One sump is located in Building 26. The sump is located near the empty tanks that formerly held Sodium Hydroxide. At the time of the site inspection, the sump was filled with turbid water and, as such, an inspection of the sump could not be conducted to confirm its integrity.

CasChem proposes that the sump in the basement of Building 26 be accessed and cleaned. Following cleaning, the sump will be visually inspected for the presence of defects that may could result in exfiltration of process wastewater into the subsurface soils.

#### **Basement of Building 27 (AOC-18-C)**

One sump is located in the basement of Building 27. The sump is located in the former laboratory. At the time of the site inspection, the sump was filled with turbid water and, as such, an inspection of the sump could not be conducted to confirm its integrity.

CasChem proposes that the sumps in the basement of Building 27 be accessed and cleaned. Following cleaning, the sumps will be visually inspected for the presence of defects that could result in exfiltration of process wastewater into the subsurface soils.

#### **Basement Of Building 34 (AOC-18-D)**

Two sumps are located in the basement of Building 34. At the time of the site inspection, the sumps were filled with turbid water and oily product and could not be inspected for structural integrity. The basement of this building is unused and contains miscellaneous abandoned equipment.

CasChem proposes that the sumps in the basement of Building 34 be accessed and cleaned. Following cleaning, the sumps will be visually inspected for the presence of defects that could result in exfiltration of process wastewater into the subsurface soils.

#### **Building 38 (AOC-18-E)**

One sump is located in Building 38. At the time of the site inspection, the sump contained turbid water and could not be inspected for structural integrity.

CasChem proposes the sump in Building 38 be accessed and cleaned. Following cleaning, the sump will be visually inspected for the presence of defects that could result in exfiltration of process wastewater into the subsurface soils.

## **Roof Leaders (AOC-19)**

Roof leaders in areas where processing or storage tanks and vessels from the production areas vent to the roof are present in Buildings 24, 28, 34, 38, and 41. The roof leaders at each corresponding building discharge to downspouts, from where the rainwater flows onto the ground surface and onto the nearest downgradient stormwater drains. During the site visit, no standing water or discoloration on the ground surface near the roof drains was observed. Investigation proposed below for the stormwater collection system (AOC-21-A) will address any concerns regarding potential discharges of contaminated water from the roof gutters.

## **Non-Contact Cooling Water Piping (AOC-20)**

Prior to the early 1990s, the facility pumped bay water from Newark Bay for non-contact cooling use. Bay water was drawn in barometric condensers (contact cooling) and then re-circulated back to Newark Bay through a closed loop system. No chemicals were added to the cooling water and the cooling water was not brought in contact with any other liquids at the facility. CasChem later installed a large cooling tower (AOC-20-A) to replace most uses of non-contact cooling water. This cooling tower was later demolished and replaced by a new cooling tower (AOC-20-B). In the early 1990s, CasChem switched to vacuum pumps, terminating the need for using the cooling loop. Non-contact cooling water discharge is regulated under a NJPDES permit. Due to the fact that no chemicals were added to the non-contact cooling water discharges, no further investigation is proposed for non-contact cooling water.

## **STORMWATER (AOC-21)**

### **Stormwater Collection Systems (AOC-21-A)**

Stormwater drains are present across the site. Overall site stormwater runoff from the Eastside block flows towards stormwater inlets located on paved areas and adjacent streets; all site stormwater inlets discharge into combined sanitary/stormwater sewer system owned and operated by PVSC. No stains were observed near the stormwater inlets on the Eastside block.

With the exception of the central loading/unloading area and the area contiguous to the WWTP, all stormwater runoff from the Bayside block flows directly to Newark Bay.

The stormwater drains near the WWTP, the truck scale, north of Building 24, and the central loading/unloading area discharge into the WWTP. These are the areas that receive stormwater from potentially contaminated areas. Since the early 1990s, a drainage valve controlled stormwater discharges. Prior to opening the valve, CasChem personnel inspect the stormwater for the presence of sheen. This valve was installed as part of compliance with facility DPCC requirements. Prior to the early 1990s, stormwater discharge was not controlled by a drainage valve. It is unknown whether stormwater was inspected for the presence of sheen.

Due to the former discharges of the potentially contaminated stormwater runoff through the stormwater drains, CasChem proposes to conduct an assessment of stormwater piping system integrity via a video survey of a statistically representative set of floor drains, and a video survey of the major discharge lines, in accordance with NJAC 7:26E-3.9(d). The objective of the video inspection is to detect structural or hydraulic defects that may have resulted in exfiltration from the piping to the soils. CasChem proposes no sampling at this time, unless the stormwater piping system video inspection indicates deficiencies in the piping system integrity.

*Hot Water Blow-Down and Condensation Fluids Discharge Drain (AOC-21-B)*

Blow-down effluent from a hot water tank located near the Boiler Plant is piped and directed towards a stormwater inlet located contiguous to the west side of the Tank E. Steam condensate from Tanks D and E (Southeast Tank Farm) is manifolded and is directed via metal piping to the paved ground surface the stormwater inlet, which collects the blow-down from the hot water tank. In the past, the overflow of the steam condensate flowed directly into the stormwater inlet; however, at the present time, the ground surface near the inlet is significantly eroded with a large hole formed by the discharge. As such, the overflow of the steam condensate from tanks D and E does not reach the nearby stormwater inlet but rather percolates into the subsurface soils. Both tanks D and E contain castor oil. Since both the hot water tank blow-down effluent and steam condensate from the Tanks D and E do not contain hazardous materials and consist entirely of condensed/hot water, no further investigation is proposed regarding AOC-21-B.



An incinerator is present on the roof of Building 26. The incinerator is a permitted air emission unit (NJDEP Permit No.: 070226). The incinerator collects heated vapors from the eight refinery castor oil kettles located on the upper floor of this building. The roof of this building is built with high flashing and does not have roof leaders. No further investigation is proposed regarding the incinerator.



Aerial photographs and Sanborn maps review indicated that in the early 1930s, the ground extending west of Building 28 to Newark Bay was filled in. Interviews with facility personnel informed that this area was filled to allow for construction of new structures onsite. The filled area is estimated to comprise approximately 63,000 square feet (1.4 acres) of land.

CasChem proposes to conduct a full remedial investigation of historic fill material to identify the location of the fill and characterize the fill material in accordance with NJAC 7:26E-4.6. This investigation will include:

- approximately six soil borings within the estimated fill area, and
- up to four borings in the adjacent area expected to be outside the historical fill area, based on historical site information, interviews, and aerial photographs.

Borings will be advanced into the subsurface until native soil material or bedrock is encountered, whichever is encountered first. It is expected that the fill material will be relatively uniform and that one sample will be collected for laboratory analysis from each boring, based on field observations and field screening.

Each soil sample will be analyzed in the laboratory for TPH. Twenty-five percent of the samples (three samples) will be analyzed for the TAL Metals, PP Pesticides, PP PCBs, PP semivolatile organic compounds with a library search of 15 tentatively identified compounds (SVOC+15). PP VOC+10 analysis will be conducted on any sample that, based on field screening results, exhibits field monitoring instrument results greater than five times background.

**APPENDIX 14**  
**ELECTRICAL TRANSFORMERS**  
**(AOC-24)**



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There are four property-owned individual oil-filled electrical transformers areas, all located at the Bayside block.

**Transformer Area No. 1 (AOC-24-A)**

This transformer area is underlain by a concrete pad, approximately 50 square feet in area, located southeast of Building 21. The transformer pad contains three pad-mounted transformers with a total oil capacity of 610 gallons.

**Transformer Area No. 2 (AOC-24-B)**

This transformer area is underlain by a concrete pad, approximately 155 square feet in area, located in the courtyard between Building 34 and Building 27. The transformer pad houses 11 pad-mounted transformers with a total oil capacity of 900 gallons. These transformers were reportedly decommissioned.

**Transformer Area No. 3 (AOC-24-C)**

This transformer area is underlain by a concrete pad, approximately 50 square feet in area concrete pad, located at the western end of the site, immediately west of the Warehouse 32 and consists of one pad-mounted transformer with a total oil capacity of 610 gallons. Review of the historical records revealed that in the past, this transformer area contained a total of three transformers. The existing transformer was reportedly decommissioned, while the remaining two transformers were reportedly emptied, decommissioned and removed off-site.

At each aforementioned transformer areas (AOC 24-A through AOC-24-C), a concrete dike and pad is present. The dielectric fluids contained in all the transformers were sampled in the past and were found non-PCB. No oils or stains were observed on the concrete pad or surrounding areas at any of the transformer areas. Review of historical records (Sanborn maps and the 1938 Site Plan) revealed the presence of each of the transformer area at the current locations. It is possible that the transformers historically contained PCB-containing dielectric fluids and have been retrofitted at a later time.

Due to the presence of the oil-filled transformers and to confirm that a release into the surface soils did not occur, CasChem proposes collection of four soil samples at each transformer pad location (one sample on each of the four sides of the pad). The samples will be collected immediately adjacent to each transformer pad in accordance with the appropriate section of N.J.A.C. 7:26E, from zero to six inches below ground surface, and will be analyzed in the laboratory for TPH and PP PCBs. ✓ 02

**Dry Transformer Area No. 4 (AOC-24-D)**

This transformer area is located at the western end of the site, immediately west of Warehouse 32 near Transformer Area No. 3, and consists of four pad-mounted dry transformers. The dry units replaced former dielectric fluid-containing transformers described above. No further investigation is proposed regarding AOC-11-D.



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**APPENDIX 15**  
**HAZARDOUS MATERIAL STORAGE AND HANDLING AREAS**  
**(AOC-25)**



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With the exception of castor oils and other materials that are stored in exterior or interior ASTs (AOC-4), the majority of hazardous materials onsite are handled inside the buildings.

**Current Buildings (AOC-25-A)**

Buildings where hazardous materials or oils are currently being stored or were historically stored in ASTs, totes, containers or drums are listed below. In addition to using the building for storage, some of these buildings were historically used for conducting processing operations.

The majority of the buildings listed below have either active or sealed floor drains or trenches.

Building No.	Approximate Floor Area (SF)
<i>Bayside Block</i>	
9	5,000
24	1,235
25	1,825
26	4,025
27	840
28	1,925
34	1,650
38	2,395
38A	1,890
39	2,460
41	3,360
<i>Eastside Block</i>	
2A	3,510
3A	440
4A	1,010
7A	4,400
P2	1,140
P3	1,000
P4	1,000
P5	770
P6A	4,400
P6	2,310
P7	1,130

Buildings 25, 28, 34, P-4 and P-5 each have a brick floor, while the remainder of the buildings have concrete floor. Review of historical records and interviews with facility personnel indicated that the aforementioned buildings used for storage and processing operation, always had a finished floor. There were no reports of spills or releases in any of the storage areas.

A crack in the concrete floor was observed in Building 9 in the lubricants/water treatment chemical storage area. The concrete floor in the chemical storage area in Building 9 was heavily stained.

Significant localized deterioration in concrete slab was observed in Building 39. The portion of the concrete around the base of the compressors and the refrigeration system was eroded with soil exposed.

Due to the presence of the potentially permeable brick floor in Buildings 25, 28, 34, P-4 and P-5 and the deteriorated concrete slab in Buildings 9 and 39, CasChem proposes completion of the required number of soil borings (a maximum of 53 borings depending on access, observed flooring material and apparent integrity) in each of the aforementioned buildings in accordance with NJAC 7:26E. Sampling frequency will be based on the floor area of each corresponding building (one boring for every 900 square feet of footprint exhibiting potentially permeable or degraded floor material), for a total of up to 53 borings depending on access, observed flooring material and apparent integrity. One sample will be collected from each boring at a depth determined by field screening and analyzed for TPH, PP VOC+10, PP BNC+15, PP AEC+10, TAL Metals and pH. If it is determined in the field that physical constraints prevent soil coring inside the buildings, soil borings will be advanced immediately outside the building, as close as possible to the building wall.

At the buildings that have a concrete floor and the floor was intact, as was found during the site inspection, the sole pathway for contamination to be released into the subsurface soils is via floor drains (AOC-15), trenches (AOC-16) or sumps (AOC-18), all discussed in Appendix 11.

At the buildings where the floor trenches are sealed or otherwise inaccessible for a visual inspection, representative soil samples will be collected along the trench at a depth corresponding to the invert of the floor trench drain (estimated at one to two feet below grade). Soil borings will be advanced adjacent to the trench in biased locations (one soil boring per 30 linear feet of stained area) in accordance with NJAC 7:26E-3.9(a)6. One soil sample will be collected from each boring at the approximate depth of the trench invert and analyzed for TPH, PP VOC+10, PP BNC+15, PP AEC+10, TAL Metals, and pH.

### Historical Buildings (AOC-25-B)

Former Building No.	Approximate Floor Area (SF)	Former Use	Former Location
<b><u>Bayside Block</u></b>			
1	2,125	Press Building	Approx. 40 Feet Due West of Office Trailer
2	2,775	Grinding and Percolation	Contiguous To South End Of Former Building 1
5	1,320	Pump Room	Contiguous To West End Of Former Buildings 1 and 2
7	1,500	Machine Shop	Approx. 15 Feet Due North Of Tank D
8	1,400	Storage, Locker and Tool Room	Approx. 15 Feet Due East Of East End of Northeast Tank Farm
9 (East Wing)	2,250	Drum Storage	Continuation Of East End Of Current Building 9
30	1,500	Miscellaneous Storage	Current East Half Of Northwest Tank Farm
31	2,000	Fatty Acids and Plasticizers Drum Storage	Current West Half Of Northwest Tank Farm
<b><u>Eastside Block</u></b>			
4	5,000	Processing, Pilot Plant and Waste Storage	Immediately South Of Current Building 4A
5	1,235	Processing, Pilot Plant and Waste Storage	Immediately South Of Current Building 4A
6	1,825	Processing, Pilot Plant and Waste Storage	Immediately South Of Current Building 4A

#### Former Building 1

The former location of Building 1 is currently capped with a concrete slab. During the site inspection, localized deterioration of the concrete slab was observed with soil exposed. Various hazardous substances, consisting principally of surfactants, foaming agents, petroleum and hydraulic oils and solvents were reportedly used in this building.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the former operations of Building 1, CasChem proposes completion of three soil borings in this area, in accordance with NJAC 7:26E-3.9. One sample will be collected from each boring at a depth determined by field screening and analyzed for PP+40.

#### Former Building 2

The former location of Building 2 is currently capped with a concrete slab. During the site inspection, localized deterioration of the concrete slab was observed with soil exposed. Various hazardous substances, consisting principally of surfactants, foaming agents, oils and solvents were reportedly used in this building.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the former operations of Building 2, CasChem proposes completion of three soil borings in this area, in accordance with NJAC 7:26E-3.9. One sample will be collected from each boring at a depth determined by field screening and analyzed for PP+40.

Both former Buildings 1 and 2 were abutting the eastern end of the current unused Sebacic Acid Process Area (AOC-1-P, Appendix 4). The hazardous substances that were used in Sebacic Acid Process Area included Recycled Diluent Oil, Sodium Hydroxide, 2-Octanol, and Light Organic. Investigation proposed above for the former Buildings 1 and 2 will address potential discharges of hazardous substances from the unused Sebacic Acid Process Area.

#### **Former Building 5**

Review of historical records identified the former Building 5 as a Pump Room. Site personnel were unfamiliar with exact nature of pumping operations conducted at former Building 5. Former Building 5 was present immediately contiguous to the western ends of the former Buildings 1 and 2. Most of the footprint of the former Building 5 overlaps the eastern end of the current unused Sebacic Acid Process Area.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the former operations of Building 5, CasChem proposes completion of two soil borings, one outside the northeast corner and one outside the southeast corner of the unused Sebacic Acid Process Area, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from each boring at a depth determined by field screening and analyzed for PP VOC+10, PP BNC+15, PP AEC+10, TAL Metals and pH.

#### **Former Building 7**

The former location of Building 7 is currently occupied by the central portion of the unused Sebacic Acid Process Area, with approximately 400 square feet of the footprint of this former building located outside the southern extent of the elevated platform for the Sebacic Acid Process Area. This building was formerly used as the Machine Shop with possible degreasing and part washing taking place. The activities conducted at the former Machine Shop may have involved the use of organic solvents, emulsion breakers, motor oils and paints. The investigation proposed below for the former Building 7, will also address potential discharges from the unused Sebacic Acid Process Area.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the historical presence of Building 7, CasChem proposes completion of two soil borings to the south and southeast, and immediately outside (expected downgradient direction) of the southern and eastern walls, respectively, of the unused Sebacic Acid Process Area, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from each boring at a depth determined by field screening and analyzed for PP+40.

#### **Former Building 8**

Approximately one-half of the former location of Building 8 is currently occupied by the northwestern end of the unused Sebacic Acid Process Area, with approximately 680 square feet of the footprint of this former building located outside the northern-northwestern extent of the elevated platform for the Sebacic Acid Process Area. This building was formerly used as a Storage, Locker and Tool Room. It is not believed that any heavy maintenance or processing activities were conducted or any that hazardous materials were used in this building. However, to complete the investigation for the unused Sebacic Acid Process Area at its northern-northwestern end, this investigation is proposed:

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the operations conducted at the northern-northwestern end of the unused Sebacic Acid Process Area, CasChem proposes completion of two soil borings immediately north and northwest of the unused Sebacic Acid Process Area, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from each boring at a depth determined by field screening and analyzed for PP VOC+10, PP BNC+15, PP AEC+10, and TAL Metals.

#### **Former Eastern End Of Building 9**

The current Building 9 is located contiguous to the western end of the unused Sebacic Process Area and contiguous to the southern end of the Northeast Tank Farm. Review of the historical records revealed that during previous years, Building 9 contained additional approximately 2,250 square feet of floor space at its eastern end. This former portion of Building 9 was used for drum storage and is currently occupied by the western-southwestern end of the unused Sebacic Acid Process Area, with approximately 350 square feet of the footprint of this former building located outside the southwestern extent of the elevated platform for the Sebacic Acid Process Area.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the former drum storage area at the eastern end of Building 9 and operations conducted at the western-southwestern end of the unused Sebacic Acid Process Area, CasChem proposes completion of two soil borings immediately south and southwest of the unused Sebacic Acid Process Area, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from each boring at a depth determined by field screening and analyzed for PP+40.

### Former Building 31

The former location of Building 31 (Fatty Acids and Plasticizers Drum Storage Building) is currently occupied by the west end of the Northwest Tank Farm. Earlier use of plasticizers included dioctyl phthalate (DOP) and Di-n-butyl phthalate, which migrated to the surface of plastics, and could then evaporate or leach into the surrounding environment. As indicated in Appendix 4, the only known hazardous substances used or stored at the Northwest Yard Tank Farm are concentrated Sulfuric Acid, 2-Octanol and White Mineral Oil. Additional potential hazardous substances associated with this Tank Farm are constituents of Adipic Acid and Recovered Butyl Alcohol. As indicated in Appendix 6, three silos were historically present contiguous to the south end of the western half of the Northwest Tank Farm. The capacity of each silo was 200,000 gallons. Two silos contained Polyethylene 629 and the third silo contained Epolene E14.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the operations of Northwest Yard Tank Farm or historical presence of Building 31 and the three silos, CasChem proposes that two soil borings be advanced immediately south (expected downgradient direction), of the western half Northwest Yard Tank Farm, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from each boring at a depth determined by field screening and analyzed for VOC, BN, and AE. One groundwater sample will be collected from each boring and analyzed for the short list of GSC-alcohols, in accordance with NJAC 7:9-6.

### Former Building 30

The former location of Building 30 is currently occupied by the east end of the Northwest Tank Farm. This building was identified as Miscellaneous Storage. CasChem's personnel were unfamiliar with exact nature of materials stored at the former Building 30 or whether the building had floor drains. As indicated in Appendix 4, the only known hazardous substances used or stored of the Northwest Yard Tank Farm are concentrated Sulfuric Acid, 2-Octanol and White Mineral Oil.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the operations of Northwest Yard Tank Farm or former Building 30, CasChem proposes completion of two soil borings immediately south (expected downgradient direction), of the eastern half of the Northwest Yard Tank Farm, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from each boring at a depth determined by field screening and analyzed for PP VOC+10, PP BNC+15, and PP AEC+10.



**Former Buildings 4, 5 and 6 at Eastside Block**

The former location of Buildings 4, 5 and 6 at the Eastside Block covers a large area extending to the south of Buildings 3A and 4A between Building 1A and 7A; this area is currently asphalt paved. The total estimated floor area of these three buildings is approximately 8,060 square feet. Based upon review of the historical records and interviews with CasChem's personnel, the activities conducted at these former buildings may have involved the use and storage of solvents, petroleum-based oils, acids and paints.

To confirm that a release of hazardous materials/substances into the surface soils did not occur from the former Buildings 4, 5 and 6, CasChem proposes completion of nine soil borings across the area corresponding to footprint of the former Buildings 4, 5 and 6, in accordance with NJAC 7:26E-3.9. One soil sample will be collected from each boring at a depth determined by field screening and analyzed for PP+40.

**APPENDIX 16**  
**WASTE TREATMENT AREAS**  
**(AOC-26)**



*A Tyco Infrastructure Services Company*



Based on interviews of facility personnel, a waste treatment area was historically present southwest of Building 7A. This location was also used for storage of drums and containers and is described in Appendix 10 (AOC-14-D). The waste treatment operations were ongoing from the early 1960s through the mid-1980s. This area encompasses approximately 2,500 square feet.

Recommendations proposed in Appendix 10 for the AOC-14-D will address any concerns regarding the historical waste treatment area.

**APPENDIX 17**  
**DISCOLORED OR SPILL AREAS**  
**(AOC-27)**



*A Tyco Infrastructure Services Company*

Discolored and stained areas were observed principally throughout the majority of the buildings that are used for chemical storage or processing. The interior of all the buildings where staining was observed contain either in-ground process trenching or sumps/pits. As indicated in Appendix 10, CasChem proposes accessing the trenches, pits and sumps to conduct a visual inspection for structural integrity. CasChem proposes no sampling at this time at the areas of surficial staining, unless the inspection of trenches, pits and sumps indicate defects in structural integrity.

Staining was observed throughout exterior aboveground tank farms within the diked storage areas across the site.

At the Southeast Tank Farm, tanks B, C, D and E store castor oil only. Castor oil was stored in these tanks throughout their history. No further investigation is proposed regarding staining within the area of the Southeast Tank Farm.

Some of the tanks located within the Northwest and Northeast Tank Farm contained hazardous substances. Investigation proposed in Appendix 4 for AOC-1-A (Northwest Tank Farm) and AOC-1-B (Northeast Tank Farm) will address any concerns regarding staining associated with potential discharges of hazardous substances stored in these areas.

Staining was observed within two exterior diked storage areas contiguous to the northern wall of Building 28. Investigation proposed in Appendix 4 for AOC-1-N will address any concerns regarding staining associated with potential discharges of hazardous substances stored in these areas.

Also, according to CasChem personnel, a substantial spill of castor oil occurred in the late 1970s or early 1980s during NL Industries' tenure. Cleanup of this spill reportedly required a slurry wall and a sump. Reportedly the sump is now dry, indicating that cleanup was completed. This spill is not indicated in the database reports. Because the spilled material consisted of non-hazardous castor oil and existing information indicates that it was cleaned up, no further investigation is proposed.

**APPENDIX 18**  
**COMPRESSOR VENT DISCHARGES**  
**(AOC-28)**



*A Tyco Infrastructure Services Company*

**Compressor West Of Building 41 (AOC-28-A)**

One air compressor is present outside the western wall of Building 41. The compressor is housed within a transite enclosure on a concrete slab. The compressor does not have a blow-down effluent line and is equipped with a manual valve for drainage purposes. No stains were observed on the slab near the compressor and the slab was intact. No further investigation is proposed at AOC-28-A.

**Compressor Inside Building 10 (AOC-28-B)**

One air compressor is present inside Building 10. The compressor is underlain by concrete slab. The compressor does not have a blow-down effluent line and is equipped with a manual valve for drainage purposes. No stains were observed on the slab near the compressor and the slab was intact. No further investigation is proposed at AOC-28-B.

**Compressors Inside Building 26 (AOC-28-C)**

One air compressor is present on the first floor and four air compressors are present on the second floor of Building 26. All the compressors are underlain by concrete slab. None of the compressors have a blow-down effluent line and each is equipped with a manual valve for drainage purposes. No stains were observed on the slab near the compressors and the slabs were intact. No further investigation is proposed at AOC-28-C.

**Compressors Inside Building 39 (AOC-28-D)**

Two air compressors are present inside Building 39. Both compressors are underlain by concrete slab. Neither compressor has a blow-down effluent line and each is equipped with a manual valve for drainage purposes. Staining was observed on the slab near each compressor. Significant damage to the concrete floor was observed at the base of the northern compressor with a large portion of the finished floor removed or eroded and soil beneath the floor exposed. Investigation proposed in Appendix 15 for Building 39 will address any concerns regarding potential discharges of compressor oil or the blow-down from this compressor.

**APPENDIX 19**

**BOILER ROOM  
(AOC-29)**



*A Tyco Infrastructure Services Company*



### **Building 10 (AOC-29-A)**

A Boiler Plant (Building 10) is located in the southern end of the Bayside block. The current Building 10 is approximately 1,800 square feet in area. Three boilers are located in this building. The boilers are powered by heating oil (No. 2 fuel oil). The fuel oil is stored in two onsite 8,700-gallon ASTs, located in the basement of Building 26. All product supply lines are above grade. All boilers are located on concrete slabs. No stains were noted on the slabs and no leaks were noted at the boilers or associated piping. The slab in the boiler room is intact. There is one floor drain in the Boiler Plant; the drain appeared to be sealed. Steam and blow-down pipes near the boilers drain directly to the onsite Wastewater Treatment Plant. The pipes run through concrete-lined trenches. A visual inspection of the trenches revealed minor pitting and scaling of the concrete with no major defects observed.

Review of the historical records indicated that after the 1950s, Building 10 was always used as a boiler house; however, the 1912 Sanborn Map identified the presence of "coal packets" near current Building 10. In addition, review of the 1944 and 1949 site plans, both entitled "The Baker Castor Oil Company General Maps" indicated the presence of two small coal/ash conveyers with corresponding pits. These pits and conveyers were located at the western and eastern corner, respectively, of Building 10. The floor drain in Building 10 is located at the entrance to the building, approximately 10 feet east (i.e., upgradient) of the former western coal/ash pit location.

**To confirm that a release into the soil did not occur from the former use of coal and the floor drain in the Boiler House, CasChem proposes completion of two soil borings at the approximate location of the historical western and eastern coal/ash pit, in accordance with the appropriate section of N.J.A.C. 7:26E. One sample will be collected from each boring at a depth determined by field screening and analyzed for TPH and TAL Metals.**

Further review of the 1944 General Map revealed that prior to construction of the onsite WWTP, the boiler blow-down was discharging via a 3-inch brass underground pipe, which ran through Building 9, into a small rectangular underground collection tank; this tank was located outside the northern corner of the current unused Sebacic Acid Process Area. This tank was approximately six feet long by three feet wide. Boiler steam returned into a "hot well", located at the eastern corner outside the Building 10. Review of the 1949 General Map indicated that the rectangular underground collection tank for the boiler blow-down collection was no longer present at its previous location and that the boiler blow-down now discharged to a small circular tank, located approximately 15 feet south (i.e., downgradient) of the previous tank location. The approximate diameter of the tank was five feet; therefore, it is estimated that the tank was buried approximately seven feet below grade.

**To confirm that a release into the surface soils did not occur from historical discharge of the boiler blow-down, CasChem proposes completion of one soil boring at the approximate location of the former blow-down collection tank, in accordance with the appropriate section of N.J.A.C. 7:26E. One sample will be collected from the boring at a depth of five to seven feet below grade and will be analyzed for TPH, PP VOC+10, PP BNC+15, and TAL Metals.**

**The investigation proposed to be conducted for Building 9 (Appendix 15) will address any concerns regarding a potential discharge of boiler blow-down from the underground pipe.**

*Building 34 (AOC-29-B)*

A hot water boiler is present in Building 34. The boiler is located on concrete floor and is fueled by natural gas. The boiler is used to heat the process vessels. The boiler operates as a closed loop system circulating a thermal fluid, with no condensate or blow-down generated. No stains were noted on the floor and no leaks were noted at the boiler or associated piping. No further action is recommended regarding the hot water boiler in Building 34.

**APPENDIX 20**  
**AIR VENTS AND DUCTS**  
**(AOC-30)**



*A Tyco Infrastructure Services Company*

The facility holds multiple air permits with the NJDEP New Source Review. The permitted emission sources include boilers, vents from the tanks and in-process units and reactors, filter presses, heaters, and an air stripper (part of the onsite Wastewater Treatment Plant). Many of the onsite buildings have ductwork with exhausts venting outside.

As indicated in Appendix 11, roof leaders in areas where processing or storage tanks and vessels from the production areas vent to the roof are present in Buildings 24, 28, 34, 38, and 41. Investigation proposed in Appendix 11 for roof leaders (AOC-19) will address any concerns regarding discharges of potentially contaminated rainwater.

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**APPENDIX 21**  
**METAL RISERS OUTSIDE BUILDING 28**  
**(AOC-31)**



A Tyco Infrastructure Services Company

Eight metal risers and one vent riser were observed immediately outside the northern wall of Building 28. The risers originate from below grade and extend approximately three to five feet above grade. The vent riser is connected to the run that extends below the steps of Building 34. Facility personnel had no knowledge regarding the observed risers and the vent line and none of the available historical records reviewed identified the presence of the storage tanks in the immediate area of Buildings 28 and 34.

**Because the metal risers are not active, CasChem proposes that the risers be removed and an area immediately adjacent to the risers be excavated to trace the extent of the pipe runs. A magnetometer may be used to attempt pipe location and guide investigation activities. Additional site investigation will be recommended based upon the results of these activities.**

APPENDIX 22

AERIAL PHOTOGRAPH REVIEW



A Tyco Infrastructure Services Company

Aerial photographs were reviewed at the NJDEP Bureau of Tidelands Management, in Trenton, New Jersey. The photographs were dated 1932, 1940, 1951, 1953, 1961, 1971, 1974, 1978, 1991, 1995, and 2002.

The 1932 aerial photograph revealed that the section of the Bayside block north of current Buildings 28 and 31 had not yet been filled and was part of Newark Bay. The existing warehouses (Buildings 36, 32 and 37) were not present at this time. Buildings 1 through 9 were present as well as the large tanks on the southern end of the Bayside block (current tanks A, B, C, D, and E). Tanks E3, D2, and C1 northeast of Building 9 were also present. One building was located northeast of the transformers located between Buildings 27 and 34. The Eastside block contained two buildings on the northern quarter of the block with a site road from Gertrude Street ending between them. The rest of the block appeared to be undeveloped. The Eastside block included the technical center and storage buildings, corresponding to the current Buildings 1A and 7A.

The 1940 aerial photograph showed the addition of Buildings 3A and 4A between the Technical Center and the Storage Building on the Eastside block. This block also featured three buildings in the north quarter of the block with a parking area between them. The Bayside block is extended to the area of the north end of Building 32 and west towards Newark Bay. The perimeter of the location of building 37 is at the same elevation as the rest of the lot; however, the center of this area was not filled at this time. Buildings 36, 37 are not present. Buildings 1 through 10, as well as 21, 24 through 28, and 30 through 32 are present. The Northeast Tank Farm is present as well as storage tanks north of Building 25. Four rail cars are also present behind Buildings 4 and 6.

The 1951 aerial photograph showed the addition of one small building at the intersection of Buildings 4A and 7A (approximately 40 feet long by 40 feet wide) at the Eastside block. Trailers were also visible between Building 7A and Building 3A. This photograph shows all of the present buildings in the Eastside block with the exception of the Building 6A, the Laboratory and the Sample Department. Parking was limited to the north corner of this block.

The 1953 aerial photograph was essentially unchanged from the 1951 photograph.

The 1961 aerial photograph showed the addition of a building that covered most of the open space between Building 7A. A drum storage area is also visible to the southwest of Building 7A, covering an area of approximately 50 feet long by 50 feet wide. To the north of this block, across Gertrude Street, the addition to the present parking lot and three ASTs between Buildings P3 and P4 were observed. Two railroad tanker cars are present behind Buildings 26 and 34. All current aboveground storage tanks are visible at the Northwest and Northeast Tank Farms. Buildings 38 and 41 are present. Storage containers are visible northwest of Building 38 and east of the Northwest Tank Farm.



The 1971 aerial photograph showed a drum storage area southwest of Building 7A. Trailers are visible immediately west and east of Building 7A. Building 2A was apparently under construction. A new building, corresponding to current Building P6A is present at the Eastside block to the north of Gertrude Street. The current pipe bridges that connect the three blocks are visible. A small (apparently) WWTP, corresponding to the current WWTP location, is present north of Building 9. An AST is visible on the northeast side of the processing room on the southeast side of Building 37.

The 1974 aerial photograph was essentially unchanged from the 1971 photograph.

The 1978 aerial photograph showed that the drum storage on the Eastside block is no longer present; however, the trailers near Building 7A are present. A new storage area, consisting of multiple storage containers (i.e. drums and totes), was observed at the north corner of the Eastside block to the north of Gertrude Street; the drum storage area is located immediately west of the Laboratory and Sample Department building, extending from the top northern corner of this block to the present north side of the gate in the fence along Avenue A. The ground surface beneath this drum storage area appears to be unpaved. There were no apparent changes on the Bayside block between 1974 and 1978. The 1978 aerial photograph was the oldest color photograph. Grass was observed on the west side of the train tracks in the Eastside block and pavement was visible on the Bayside block.

The 1991 aerial photograph showed that the building to the west of Building 7A was no longer present. The south block of the Eastside Block is in the same configuration as the present. The drum and tote storage area in the north corner of the Eastside block is no longer present and this entire area is now used as a paved parking lot. Tank A on the east corner of the Bayside block has been removed. Otherwise, both Bayside block and Eastside block showed no significant changes from the 1978 photograph.

The 1995 aerial photograph was essentially unchanged from the 1991 photograph.

The 2002 aerial photograph revealed the presence of the AST on the east side of building 2A. A trash compactor is visible at the loading dock to the south of Building 4A. Buildings 1, 2, 5, and 7 are no longer present and the Sebacic Acid plant is visible at its present location. The overall configuration and layout of the structures on both Eastside and Bayside blocks essentially correspond to the current site layout.

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**APPENDIX 23**

**SPILL REPORT SUMMARIES**



A Tyco Infrastructure Services Company

1 February 1991, NJDEP Case # not referenced

Available records indicate that Vorite 677 M-5 (containing MEK and TDI) spilled from two drums located in the southeast corner of building #37 at 14:30. Both drums were immediately overpacked and the spilled material was contained on the concrete floor and cleaned up by 19:00 the same day that the spill occurred. The NJDEP was not notified because there was not a release to the exterior environment. There was no indication of soil or groundwater contamination resulting from the release. No further investigation is proposed.

21 December 1990, NJDEP Case #90-12-21-1047

Available records indicate that five gallons of acetic acid spilled on the outdoor pavement of the site at 10:35. This was and reported to the NJDEP operator 18 at 10:50. The spill occurred during the filling of a tank truck. The material was contained on the pavement, neutralized with soda ash, and diluted with water. The Bayonne Fire Department HazMat team and the Bayonne Environmental director viewed the site. There was no indication of soil or groundwater contamination resulting from the release. No further investigation is proposed.

5 January 1990, NJDEP Case # not referenced

Available records indicate that two to five gallons of ethylenediamine were released to the diked area surrounding an AST that was being filled by a tank truck. The spill was contained in the diked area and a white vapor cloud (heavier than air) was emanating from the material. The cloud was sprayed with hoses according to the MSDS recommended procedures for ethylenediamine. The NJDEP and emergency response personnel were notified. There was no indication of soil or groundwater contamination resulting from the release. No further investigation is proposed.

8 August 1991, NJDEP Case # not referenced

Available records indicate that one quart of castor oil was released to Newark Bay. The Coast Guard was notified and responded to the release. CasChem employees immediately placed sorbent booms around the oil and the booms were left in place. The Coast Guard accepted CasChem's response and noted that it would not pursue the release as a violation. No further investigation is proposed.

31 October 1990, NJDEP Case # not referenced

Available records indicate that 10 to 50 gallons of diesel fuel was spilled on the paved roadway in front of Building 37. ~~The spill occurred at 18:25 and was cleaned using absorbent rolls.~~ Absorbent rugs were also placed over any nearby drains. All of the material was placed in drums for later disposal. Cleanup operations were completed by 20:00. No further investigation is proposed.

24 October 1990, NJDEP Case # not referenced

Available records indicate that asbestos, calcium silicate and oil were spilled during a small fire in Building 41. The area was wetted and the material was placed in plastic bags, which were placed in a drum for later disposal. There was no release to the environment. No further investigation is proposed.

24 October 1990, NJDEP Case # not referenced

Available records indicate that 10 gallons of Vorite 63 spilled on the concrete floor of Building P6. Soap and water were used to clean up the residue. All materials were placed in a DOT drum for later disposal. There was no release to the environment. No further investigation is proposed.

12 February 1992, NJDEP Case #92-212-1010-01

Available records indicate that, due to a malfunction of a blown oil incinerator, a strong odor was emitting from the blown oil kettles. The NJDEP, Hudson Regional Health Commission, and the city of Bayonne were notified. The malfunction was repaired within 35 minutes of the initial problem. No further investigation is proposed.

15 May 1992, NJDEP Case #92-5-15-1011-17

Available records indicate that Lubricin N-1 (a derivative of castor oil) leaked from a tote tank. The leak was stopped and the spilled material was pumped back into drums along with the absorbent pads. Approximately 20 gallons were spilled onto the pavement and 1 gallon reached a storm drain, which discharged into Newark Bay. The material that reached the bay was surrounded with a boom and a sweep was used to recover the material. The appropriate regulatory authorities were contacted. No further investigation is proposed.

22 March 1990, NJDEP Case #90-03-22-0825

Available records indicate that five to 10 gallons of soap and castor oil were spilled into Newark Bay. Both of these substances are non-hazardous. All of the proper regulatory authorities were notified. Sorbent booms and a sweep were set in the bay to contain any oil present with the soap even though no sheen was visible on the water. The apparent source of the soap was the hot oil department. A broken industrial sewer pipe in the same lined pipe trench as the seawater outfall pipe was reportedly the probable cause of the leak. The soap was contained and cleaned by Ken's Marine within two hours of the beginning of the leak. No further investigation is proposed.

**9 January 1991, NIDEP Case # not referenced**

Available records indicate that approximately 1,200 pounds of Polycin 1863 leaked from an open filter valve on the AST and spilled into the moat surrounding the tank. The exact are onsite where this incident occurred was not referenced. Some of the spilled material was pumped into drums to be reworked and the rest was pumped through the WWTP. Dried excess debris in the moat was scraped and disposed of the following day. The entire spill was contained in the moat. No further investigation is proposed.

**10 January 1990, NIDEP Case # not referenced**

Available records indicate that approximately 2,500 pounds of molten castor wax spilled onto the concrete floor of Building 41. The castor wax was contained and shoveled into drums to be reused. There was no release to the environment. No further investigation is proposed.

**9 July 1991, NIDEP Case # not referenced**

Available records indicate that rain water seeped into a drum containing urethane, causing the urethane to foam and the foam to overflow the drum. The material expanded into the immediate area of the drum and solidified. The material was scraped up and drummed for disposal. The drum that leaked was overpacked. The spill occurred on concrete and did not reach soil or groundwater. No further investigation is proposed.

**1 March 1994, NIDEP Case # not referenced**

Available records indicate that 20 gallons of acetic anhydride leaked from the valve on a tank truck that was beginning to unload. HazMat crews arrived and covered all appropriate drains. The leak was slowed with CO<sub>2</sub> by freezing the valve and a basin was placed under the leak to collect any additional material. This occurred on bermed concrete and there was no discharge to Newark Bay or groundwater. No further investigation is proposed.

**1 June 1992, NIDEP Case # not referenced**

Available records indicate that Acetic Acid leaked out of tanks 140 and 139 in Building 25. This was the result of a frozen equalizing line between the tanks. The acetic acid was neutralized with soda ash (sodium carbonate) immediately after the spill. The neutralized material was then flushed into the industrial sewer main within the building. The leak was contained and no release to the environment was observed. No further investigation is proposed.

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**APPENDIX 24**

**PREVIOUS REMEDIAL ACTION SUMMARY**



*A Terra Infrastructure Services Company*

The following previous reports were obtained and reviewed.

- *Tank Closure Sampling Plan*, Environics, April, 1986 (Revised); and
- *Tank Closure Documentation And Results Of The Soil Sampling And Analysis*, Environics, August, 1989.

Review of the aforementioned previous reports indicated that three USTs that were used for temporary storage of recoverable xylene and urethane were decommissioned in 1984. Due to the physical proximity of the tanks to buildings foundations, the tanks were closed in-place by emptying, cleaning, and filling each tank with concrete. Prior to the UST closure, CasChem prepared a Tank Closure Soil Sampling Plan (Sampling Plan). The Sampling Plan was prepared on September 11, 1985 and submitted to the NJDEP, Hazardous Waste Management Division, for review. The Sampling Plan was subsequently revised in April, 1986 to address the NJDEP's comments.

From August 22, 1984 through November 10, 1984, CasChem cleaned, washed, evacuated and decommissioned three waste xylene/urethane waste USTs. All product and washwater removed from the tanks were placed in DOT-approved containers and disposed off-site.

Subsequent to the UST closure, soil sampling was conducted in February 1987 and June 1988. As part of the soil sampling activities, soil borings were advanced and a total of 10 confirmatory soil samples were collected around the tanks (the tanks contained waste products and, as such, did not have product pipe runs) in accordance with the NJDEP requirements applicable at the time of closure. The report summarizing the results of soil sampling collection and laboratory analysis were issued to NJDEP, and a No Further Action (NFA) letter was issued for these three former USTs. The referenced NFA letter is attached.

As indicated in the previous UST closure and assessment documentation, the confirmatory soil sample frequency and analytical results met standards in place at the time of UST closure. As required in NJAC 7:26E, CasChem performed an Order Of Magnitude Analysis. Only sample B-7 exhibited TPHC concentrations above the previous cleanup criteria; the TPHC concentration in this sample (see table below) is well below the current criterion of 10,000 mg/kg. All of the xylene concentrations are well below the current Residential most stringent Soil Cleanup Criterion (Impact to Groundwater) of 67 ppm. No further investigation is proposed for AOC-2-E and AOC-2-F.

**Summary of Order Of Magnitude Analysis  
Soil Sample Analytical Results  
Two 550-gallon and One 6,000-gallon Waste Xylene/Urethane Waste USTs**

Soil Sample ID	Sample Depth (Feet bgs)	Date Sample Collected	Parameter	Result (mg/kg)	Previous Standard (mg/kg)	Current Standard (mg/kg)
B-1	10-12	02/05/1987	TPHC	20 U	100	10,000
			Xylene	0.001 U	NS	67
B-2	10-12	02/04/1987	TPHC	20 U	100	10,000
			Xylene	0.001 U	NS	67
B-3	8-10	02/05/1987	TPHC	20 U	100	10,000
			Xylene	0.0135	NS	67
B-4	10-12	02/04/1987	TPHC	20 U	100	10,000
			Xylene	0.001 U	NS	67
B-5	10.5-11.5	02/04/1987	TPHC	20 U	100	10,000
			Xylene	1.146	NS	67
B-6	10-12	02/03/1987	TPHC	20 U	100	10,000
			Xylene	2.019	NS	67
B-7	10.5-11.5	02/04/1987	TPHC	<b>214</b>	100	10,000
			Xylene	0.234	NS	67
B-9	8-10	06/09/1987	TPHC	20 U	100	10,000
			Xylene	0.355	NS	67
B-10	8-10	06/09/1987	TPHC	20 U	100	10,000
			Xylene	0.618	NS	67
B-11	8-10	06/09/1987	TPHC	20 U	100	10,000
			Xylene	0.197	NS	67

"U" denotes the analyte was not detected above the given laboratory detection limit.

"NS" denoted No Standard - the earliest most stringent standard under 7:26D was 10 mg/kg (1992).

Bold indicates the concentration above the NJDEP's standard in place at the time of closure.



TANK CLOSURE SAMPLING PLAN  
ENVIRONICS, APRIL, 1986 (REVISED)

CasChem

433, 85  
Ltr #151 D

CasChem, Inc.  
40 Avenue A  
Bayonne, NJ 07002  
(201) 255-7900

September 23, 1985

State of New Jersey  
Department of Environmental Protection  
Division of Waste Management  
120 Route 156  
Yardville, NJ 08620

Attention: Mr. Richard Collister

Dear Mr. Collister:

In compliance with the administration Order dated July 29, 1985, we are enclosing a copy of our sampling plan and the decontamination procedure used for the tank closure.

The Tank Closure Soil Sampling Plan was prepared by our consultant, Environics, Inc. to comply with N.J.A.C. 7:26-9.8(e) 1 iii and Item 6 of the Administrative Order. The decontamination procedures used during the closure of the three underground hazardous waste storage tanks was in compliance with N.J.A.C. 7:26-9.8(e) 3. This brings us into compliance with Item 5 of the Administrative Order.

Submission of the sampling plan and decontamination procedure also satisfies Item 7 of the Administration within the timeframe of the 30 day extension granted to CasChem in Mr. Raimond Belonzi's letter of September 3, 1985.

Therefore, we believe we are in full compliance with the Administrative Order. At this time we are asking that our request to be delisted as a hazardous waste storage facility be granted. As part of this we request that the implementation of the sampling plan be waived for the following reasons.

We believe the intent of the soil sampling program has already been satisfied by our closure procedure and the tank usage.

- 1) During the closure procedure the tanks were opened, cleaned and inspected. No evidence of damage, pinholes, corrosion, etc. were observed.
- 2) Where exposed, the soil around the tank was

State of New Jersey  
Department of Environmental Protection  
Division of Waste Management  
September 23, 1985  
Page Two

- 3) The tanks were used to store waste xylene generated in the cleaning of urethane reactors. This material had formed a coating over the interior of the tank which had to be removed by high pressure water washing during closure. This material sealed the interior of the tank and eliminated the potential for leakage.

The other factor to consider is the difficulty of implementing the sampling plan. The 6000 gallon tank is located under a building and the two 550 gallon tanks were under a narrow alleyway between two buildings. The entire area is covered with reinforced concrete. Getting the proper drilling equipment into place will be difficult, as will be the actual taking of the samples. It may also have a serious detrimental effect on the operations carried out in the area and on the building itself.

Having now complied with the Administrations Order of July 29, 1985, CasChem feels that it has satisfied the intent of the closure regulations. Our violation, we feel, was minor in that we failed to submit notification properly, not that we did not notify the state at all or failed to close the tank properly. Since further action would not produce significant results, we again request that the implementation of the sampling plan be waived and this site be delisted as a hazardeous waste storage facility.

Very truly yours,

*Brian D Cole*

Brian D. Cole  
Plant Manager

BDC/lc

bcc J. Gudzak  
J. Lynch

P. Dahlgren  
Environics Inc.  
46 Jackson Drive  
Cranford, N.J. 07016-3580

~~11/Waste Xylene Tank~~

Let's protect our earth



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trella, Ph.D., Acting Director

CN 028

Trenton, N.J. 08625

609-292-1250

Mr. Brian D. Cole, Plant Manager  
CasChem, Inc.  
40 Avenue A  
Bayonne, NJ 07002

19 NOV 1986

Dear Mr. Cole:

RE: Underground Hazardous Waste Storage Tanks Closure SSAP Approval  
for CasChem, Inc., Bayonne, EPA ID NO. NJD 067 520 890

The Bureau of Hazardous Waste Engineering (the Bureau) has completed a review of the revised Soil Sampling and Analysis Plan (SSAP) for the hazardous waste storage tanks for the above referenced facility dated May 30, 1986. The New Jersey Department of Environmental Protection (NJDEP) finds the plan in compliance with the criteria set forth by N.J.A.C. 7:26-9.8 et seq. facility closure requirements. CasChem, Inc. is hereby authorized to implement closure in accordance with N.J.A.C. 7:26-9.8, the approved closure plan and the following conditions:

1. CasChem, Inc. shall sample and analyze the soil in accordance with the approved SSAP. This shall be completed within ninety (90) days from the date of this approval. The company shall notify the Bureau at least two (2) weeks prior to sampling to arrange to have an auditor present during field sampling.
2. Within sixty (60) days from the date of completion of the SSAP implementation, the company shall submit the results to the Bureau.
3. If a review of the SSAP report by the Bureau shows soil contamination, CasChem, Inc. shall submit a cleanup proposal and obtain the appropriate ground water discharge permit from the Division of Water Resources, Bureau of Ground Water Quality Management, within sixty (60) days of the Bureau's notification that the SSAP submission indicates necessary decontamination.
4. This approval is subject to compliance by CasChem, Inc. with the Division of Water Resources Regulation on ground water monitoring (N.J.A.C. 7:14A-1 et seq.) for the subject tanks.

Mr. Brian D. Cole

2

19 NOV 1986

5. Within thirty (30) days after the closure is completed, including any required remedial action, the owner or operator shall submit to the NJDEP certification both by the owner or operator and by an independent registered New Jersey professional engineer that the tanks have been closed in accordance with the specifications in the approved closure SSAP.

If you have any questions relative to this matter, please call Ali Chaudhry of my staff at (609) 292-9880.

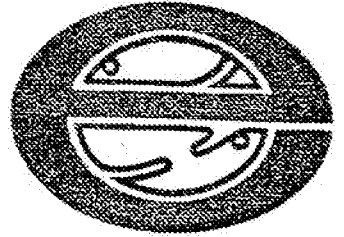
Very truly yours,



Frank Coolick  
Acting Assistant Director  
Hazardous Waste Regulation

EP11/slw

cc: Angel Chang, USEPA, Region II  
Richard Collister, BCE  
David Mooney, DWR  
Christine Andreas, BEMQA



TANK CLOSURE SOIL SAMPLING PLAN

CAS CHEM, INC.  
Bayonne, New Jersey

September 11, 1985  
Revised April, 1986

## 1.0 INTRODUCTION

Between August 13 and November 5, 1984, three underground tanks at the CasChem plant in Bayonne, New Jersey were removed from service, cleaned and filled with concrete. The three tanks (which included one tank of 6000-gallon capacity and two tanks of 550-gallon capacity each) had been used for temporary storage of recoverable xylene. The plan for sampling soil adjacent to and immediately beneath the three tanks presented here is submitted in compliance with N.J.A.C. 7:26-9.8(e)l(iii).

## 2.0 LOCATION OF INVESTIGATION

The three tanks under investigation are located near the northwestern-most corner of the CasChem site, in Bayonne, Hudson County, N.J. The area is approximately 1200 feet east of Newark Bay, and approximately 1400 feet north of Kill Van Kull, adjacent to the right of way for the Bayonne Bridge (Figure 1).

The vicinity of this investigation has been the location of industrial activity for at least the past 100 years.

Location of the tanks are shown on Figure 2. The 6000-gallon tank is located entirely beneath the concrete floor of Building P-7. The two 550-gallon tanks are located beneath the concrete pavement between Buildings P-5 and P-7.

The procedures used in emptying, cleaning and closing the three tanks have been described elsewhere. Briefly, the three tanks have been emptied of product, cleaned, certified gas-free and filled with concrete. The bottom of the 6000-gallon tank is estimated to be 10 feet below present ground level. The bottom of the 550-gallon tanks are estimated to be 8 feet or less below present ground level.

Depth to groundwater in the location of this investigation is not known, but is expected to be shallow.

At the time the tanks were in use, spent xylene was the primary constituent. The xylene was used for reactor clean-out, and the waste stream was composed of 95 percent or more xylene.

### 3.0 SITE GEOLOGY

The CasChem site overlies the Palisades sill, an intrusive igneous formation composed of diabase.

All soil in the vicinity is either fill or extensively re-worked native soil. No undisturbed soil exists in the area.

### 4.0 SAMPLE LOCATIONS AND DEPTHS

Soil samples will be collected from soil borings drilled at the approximate locations shown on Figure 3. Borings B1 through B4 have been selected to examine soil on the four sides of the 6000-gallon tank. Maximum penetration will be to 12 feet, which is two feet below the tank bottom. The two 550-gallon tanks, which had been coupled together in use, are here considered as a single tank. Borings B-5 through B-7 have been located to investigate soil quality on the northern, western and southern sides. Maximum penetration of these borings will be 10 feet, which is two feet below the tank bottom. Examination of the eastern side will be included in the analysis of the 10 to 12' sample from boring B-4.

Split spoon soil sampling will be continuous from below the concrete pavement to the maximum depth of penetration. If a water table is encountered within the depths of the borings, a sample from each boring at the depth of the water table will be collected for analysis.



The sample of maximum depth from each boring will be collected for analysis. Soil samples will be transferred from split spoons to sample jars with stainless steel spatulas, knives and/or scoops. All other samples will be retained by Environics for lithologic description only. However, soil will be made available to DEP for split sample analysis, if desired.

Quality Assurance samples are discussed in Section 9.0.

#### 5.0 DRILLING METHOD

Soil borings will be drilled by Empire Soils Investigation, Inc. Edison, N.J. The method for advancement of the hole (i.e., drive casing, hollow stem auger, etc.) will be made in the field. All drilling tools will be steam-cleaned prior to initial use and subsequent to each use on-site.

Tools which come into direct contact with soil samples (i.e., split spoons, knives, scoops and spatulas) will be cleaned prior to initial use and subsequent to each use on-site in accordance with the following protocol:

- (1) Detergent wash;
- (2) Tap water rinse;
- (3) Distilled water rinse;
- (4) Reagent grade acetone rinse;
- (5) Air dry;
- (6) Distilled water rinse;
- (7) Air dry.

At the completion of sampling, borings will be backfilled with cuttings, bentonite and concrete.

## 6.0 ANALYTICAL PROGRAM

The choice of analytic parameters will include analysis for xylene, Petroleum Hydrocarbons (PHC) and Oil and Grease (OG). Since xylene was the primary component of the tanks, analysis for xylene alone will be sufficient to determine whether any leakage had occurred. The analyses for PHC and OG have been included, to detect the various mineral and vegetable oils which may have been present in the tank.

All analyses will be performed by Garden State Laboratories, Inc., in Irvington, New Jersey. Analytical methods are as follows:

Xylene - EPA SW-846, Method 5020 or 5030;

PHC - EPA 418.1, modified for soil by soxhlet extraction;

OG - EPA 413.1, modified for soil by soxhlet extraction.

Samples submitted for analysis will be placed in jars prepared and supplied by the laboratory. These samples will be packed on ice in the field and will be delivered to the laboratory within 24 hours of completion of sampling operations.

## 7.0 CHAIN OF CUSTODY

Samples will be collected by, and remain in the custody of, Environics, until custody is formally accepted by the laboratory. Standard chain-of-custody documentation will be maintained.

## 8.0 SAMPLE SPLITTING

The DEP will be notified not less than 72 hours prior to the

beginning of sampling operations. Sample splits will be available to the DEP if a representative is present at the time of sample collection.

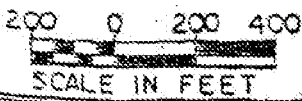
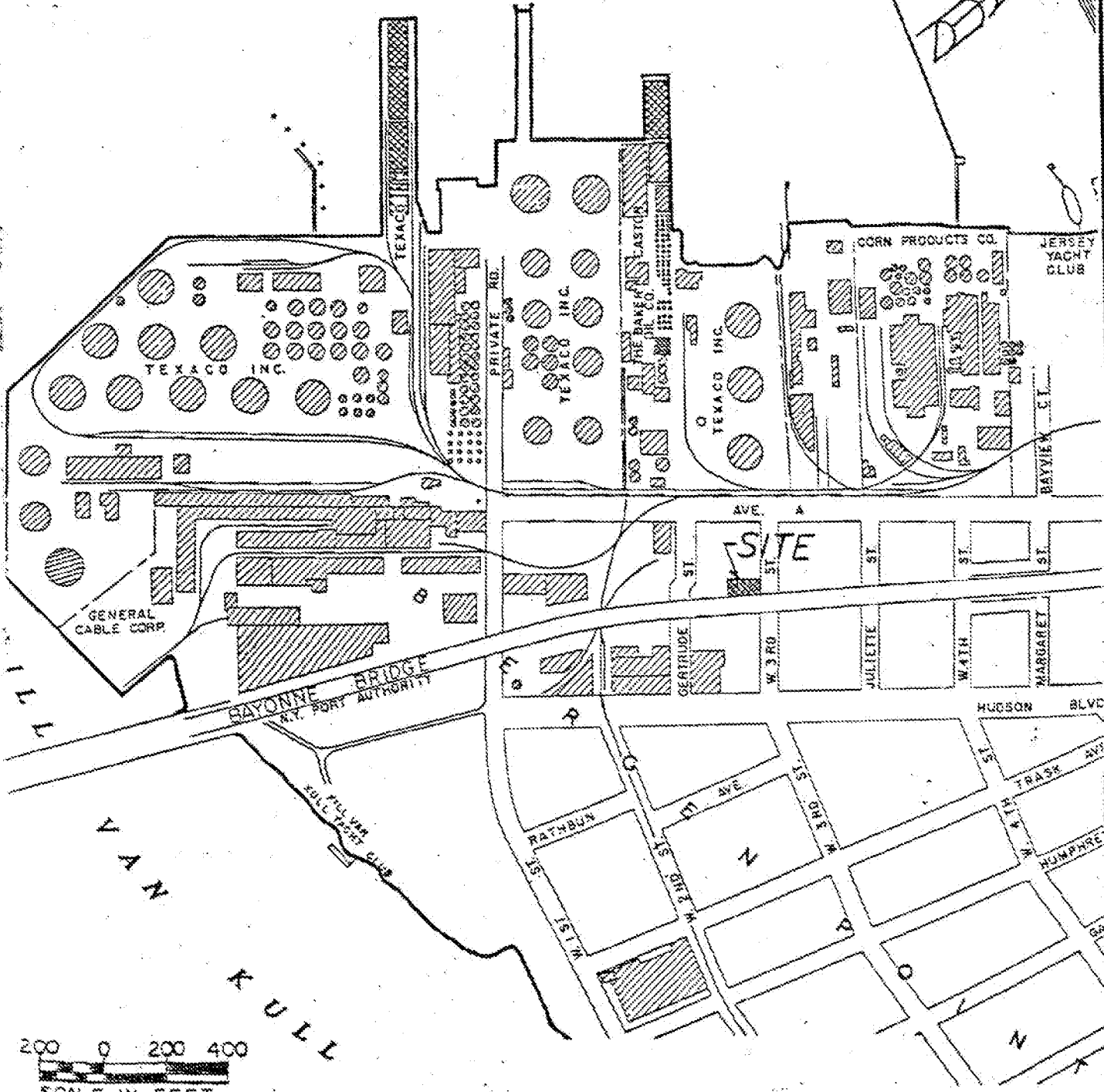
#### 9.0 QUALITY ASSURANCE SAMPLES

The sample matrix for all samples involved in this investigation is soil. Therefore, any correlation between analytical results obtained from the samples and from blank or duplicate samples is at best dubious. However, since quality assurance samples are required by the NJDEP, they will be obtained as discussed below.

9.1 Xylene - One travel blank of distilled/deionized water will be analyzed for Xylene for each batch of samples delivered to the laboratory. The travel blanks will be supplied by the laboratory. It is anticipated that site conditions will make the test boring drilling a difficult and time consuming process. The anticipated duration of field operations for the project is five (5) working days. However, since the holding time for Xylene allowed for EPA method 5020 and 5030 is 14 days, it is anticipated that samples will be delivered to the laboratory in one or two batches.

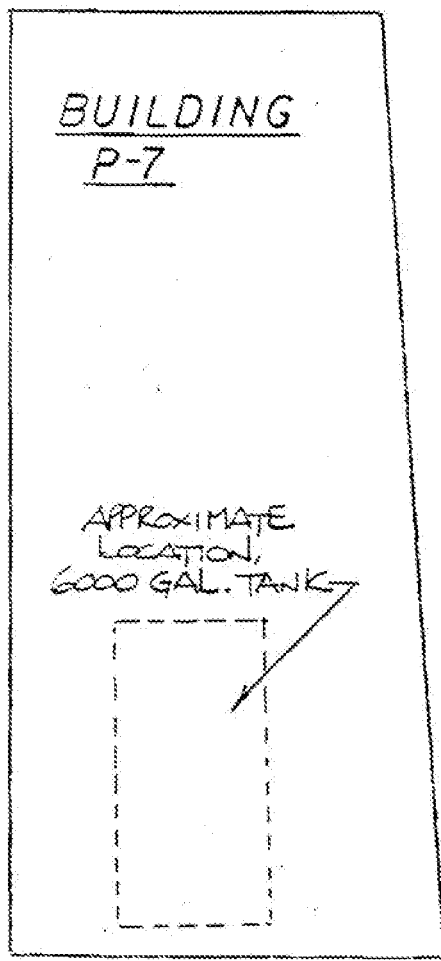
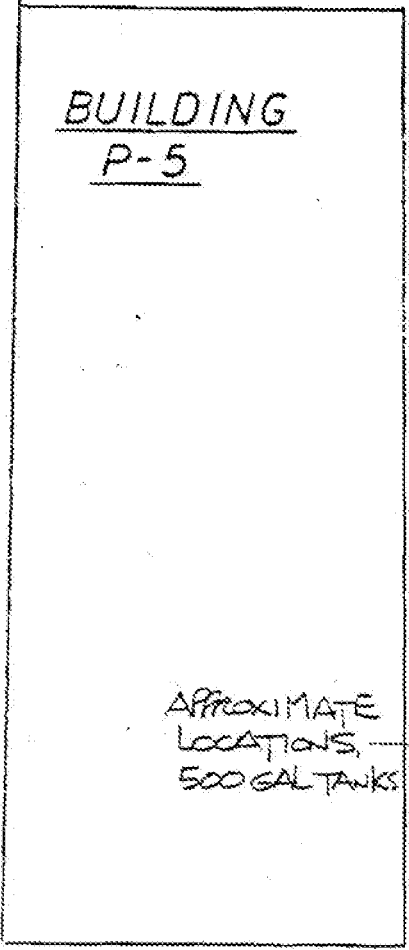
One field blank of distilled/deionized water will be analyzed for Xylene for the project. Water for this blank will be supplied by the laboratory. The field blank will be prepared at the final boring location, and will be submitted to the laboratory for analysis with the final batch of samples.

N E W A R K

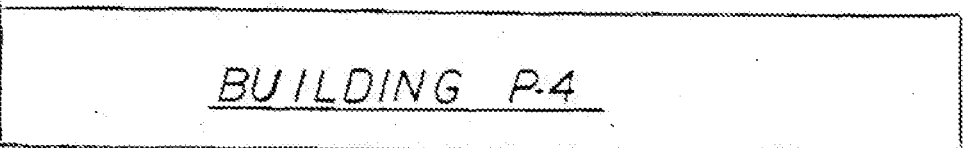


DATE SHOWN	JOB NO. <b>E-1051-84</b>
DRAWN BY	PROJECT TITLE
CHECKED BY <b>PD</b>	<b>CAS CHEM INC.</b>
APPROVED BY <b>GD</b>	

<b>ENVIRONICS, INC.</b>	
ENVIRONMENTAL CONSULTANTS	
40 JACKSON DRIVE	BRUNSWICK, N.J. 07015
DRAWING TITLE	DRAWING NO.
	REV.



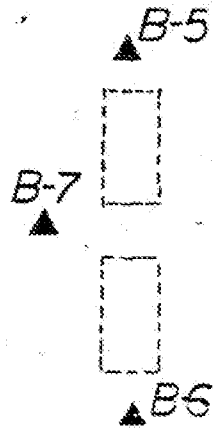
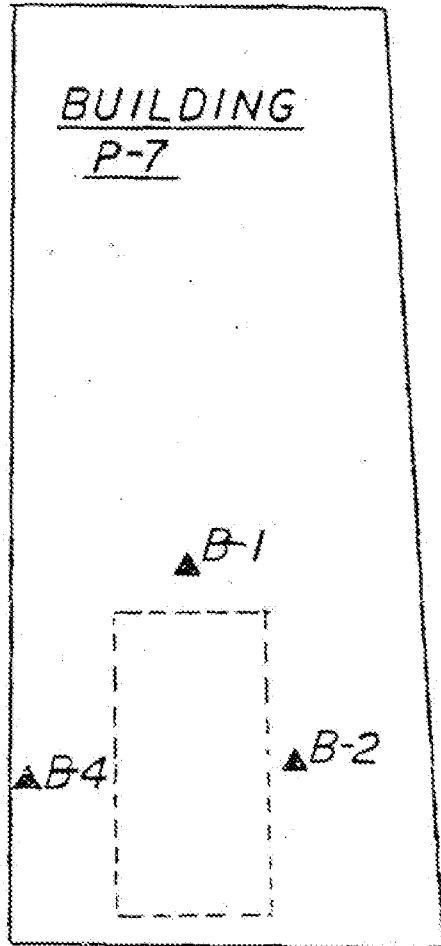
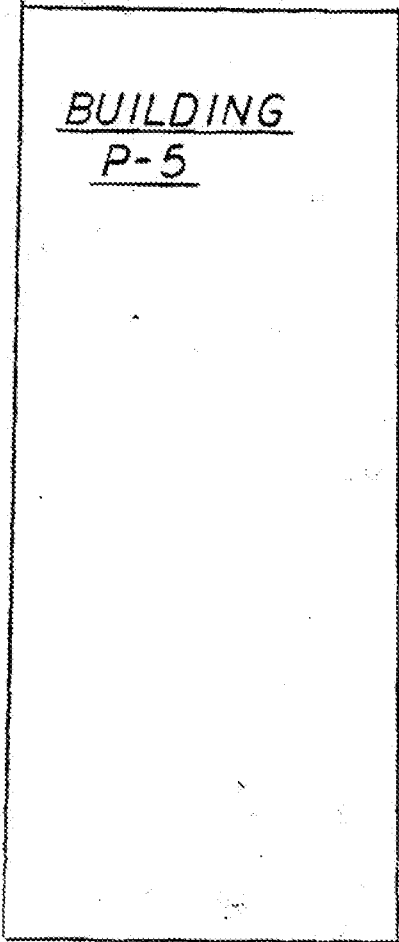
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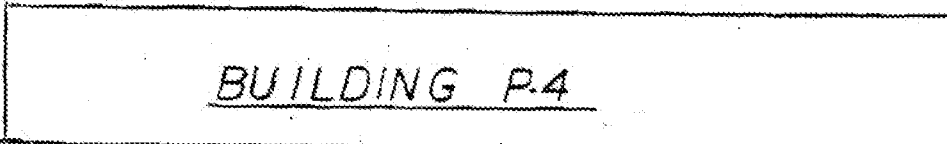
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CHECKED BY PD  
APPROVED BY PD  
TK 9-5-85

JOB NO. E-1051-84  
PROJECT TITLE  
CAS CHEM INC.  
TANK CLOSURE

ENVIRONICS, INC.  
ENVIRONMENTAL CONSULTANTS  
46 JACKSON DRIVE GRANFORD, N.J. 07016  
DRAWING TITLE  
TANK LOCATIONS  
DRAWING NO.  
2



BAYONNE BRIDGE



SCALE	1"=10'-0"
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CHECKED BY	PD
APPROVED BY	PD
DATE	5-8-85

JOB NO. **E-1051-84**

PROJECT TITLE  
**CAS CHEM INC  
 TANK CLOSURE  
 BAYONNE, N.J.**

**ENVIRONICS, INC.**  
 ENVIRONMENTAL CONSULTANTS  
 46 JACKSON DRIVE  
 CRANFORD, N.J. 07016

DRAWING TITLE  
**PROPOSED SOIL**

DRAWING NO.

#151D

January 20, 1986

CasChem, Inc.  
40 Avenue A  
Bayonne, NJ 07002  
(201) 858-7900State of New Jersey  
Department of Environmental Protection  
Division of Waste Management  
32 E. Hanover Street  
CN028, Trenton, N.J. 08625

Attention: Richard Collister

Re: Closure Procedures & Soil Sampling & Analysis Plan For Hazardous Waste  
Storage Tanks For CasChem, Inc., Bayonne, EPA ID No. NJD 067 520 890

Dear Mr. Collister:

CasChem has reviewed your request to modify our Soil Sampling Plan for the  
closure of three waste Xylene tanks. Our comments are as follows:**4.0 Sample Locations & Depths**

Field and trip blanks are normal procedures for ground water samples. Since we are taking only soil samples, these additional samples would not confirm nor deny the proper handling of the soil samples by either the soil boring contractor and/or the laboratory. We feel this is an unnecessary expense.

To our knowledge there is no stainless steel split spoon apparatus on the market at this time.

The procedure states that soil sampling will be continuous to two feet below the tank and that if water table is encountered, a sample will be collected above the water and at the maximum depth for analysis. If no water table is encountered, the sample at the maximum penetration (ten feet) will be analyzed. This is exactly what you requesting us to revise. What is different?

**5.0 Drilling Method**

In our analytical procedure we are looking for Xylene, Petroleum Hydrocarbons, and Oil and Grease. We feel high pressure steam cleaning will be much more effective in removing these compounds from the drilling and sampling equipment than cold detergent/water and alcohol washing.

State of New Jersey  
Department of Environmental Protection

January 20, 1986

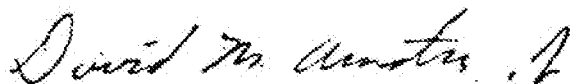
6.0 Analytical Program

If you check your records, you will see that NYTest Environmental, Inc. of Westbury, N.Y. is a NJDEP State Certified Lab (#73469).

For these reasons we feel the Soil Sampling Plan is adequate and need not be changed. Having now complied with the Administrations Order of July 29, 1985, CasChem feels that it has satisfied the intent of the closure regulations. Our violation, we feel, was minor in that we failed to submit notification properly, not that we did not notify the State at all or failed to close the tank properly. Since further action would not produce significant results, we again request that the implementation of the sampling plan be waived, and this site be delisted as a hazardous waste storage facility.

If you have any other questions regarding this letter or the plan, please call me at (201) 858-7935.

Sincerely,



David M. Armstrong, Jr.  
Plant Engineer

DMA20.86



*TANK CLOSURE DOCUMENTATION AND  
RESULTS OF THE SOIL SAMPLING AND ANALYSIS,  
ENVIRONICS, AUGUST, 1989*

## TANK CLOSURE DECONTAMINATION PROCEDURES

### GENERAL

Tank closure procedures were followed in accordance with NFPA-30 recommendations entitled "Abandonment Or Removal of Underground Tanks". It was not feasible to remove these tanks due to their physical location, therefore, each tank was cleaned and filled in place.

### PROCEDURES

- (1) The top of each tank was exposed by removing concrete and dirt.
- (2) All pipelines leading into the tanks were removed.
- (3) Access to the tanks were gained by cold cutting a hole in the top large enough for a man to fit through.
- (4) The xylene was then pumped out of each tank into 55 gallon drums which were provided by GasChem.
- (5) A man, wearing a self contained breathing apparatus then entered each tank, spread absorbent materials, squeegeed the tank walls and cleaned up the absorbent material. This absorbent was placed in 55 gallon drums for disposal.
- (6) Each tank was then high pressure water washed, and the wash water generated from this step was also pumped into 55 gallon drums for disposal.
- (7) A forced air blower was then set up to circulate air through the tanks in order to evaporate any residual water or xylene.
- (8) Each tank was then tested by Marine Chemists, Inc. for xylene and certified 'clean and gas free'.
- (9) After certification was issued, all the tanks were filled with cement.
- (10) All waste materials generated by this clean out procedure were disposed of in accordance with New Jersey Department of Environmental Protection Regulations.

DMA433.85

**AMERICAN INDUSTRIAL MARINE SERVICES, INC.**

P.O. BOX 9128 • NEWARK, NEW JERSEY 07104 • (201) 589-0992

December 21, 1984

Enviro-nics  
46 Jackson Drive  
Cranford, N.J. 07016

Attention: Mr. Goldman

Re: Cas Chem

Dear Sir,

American Industrial Marine Services Inc., between 22 August 84 and 10 November 84 cleaned to a gas free condition, confirmed by an independent chemist, Marine Chemist, Inc., three tanks, (1) 6000 gallon tank, located in Building #7 and (2) interconnected vessels of 550 gallons each. All product removed from the waste tanks as well as water washes were placed in DOT approved containers and left on site, Cas Chem was to arrange for all disposal.

After the Marine Chemist issued his report, we then proceeded to fill all the vessels with concrete and capped them for the purpose of taking the units totally out of service.

Hoping this will be sufficient for your needs, I remain.

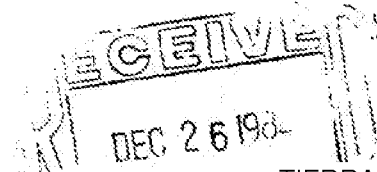
Yours truly,

AMERICAN INDUSTRIAL MARINE SERVICES

*Sergio Germinario*  
Sergio Germinario, President

Sworn to and scribed before me  
on December 21, 1984.

*Harry J. Whalen*  
HARRY J. WHALEN

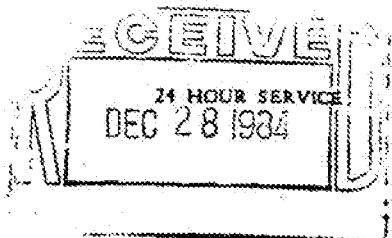


Area Code 201  
656-7754

Tel. Nights: (212) 494-0778

# Marine Chemists, Inc.

P.O. BOX 166  
Uptown Station  
HOBOKEN, N. J. 07030



## MARINE CHEMIST'S CERTIFICATE

Survey Requested By AMERICAN INDUSTRIAL

Vessel XYLENE WASTE TANK  
Type Vessel BLOG P7  
Location OK OAS CHEM

Owner or Agent CAS-CHEM  
Test Method STANDARD / DRAGER\*  
Last Cargo XYLENE

Date AUG 22-1984  
Time of Completion 12:30 PM  
Certificate No. 2

40 AVENUE A  
BAIONNE NS.

\* TOLUENE 25 of TUBES.

UNDERGROUND XYLENE  
WASTE TANK  
BLOG P7

NOT SAFE FOR MEN

NOT SAFE FOR FIRE

NOTE TANK HAS BEEN CLEANED

IS GAS FREE:

(EXPLOSIVE GAS — 0% LEL  
OXYGEN — 21%)

TANK MUST BE EXCAVATED FOR  
'SAFE FOR FIRE' CLASSIFICATION.

TEST FOR XYLENE — 150 PPM  
XYLENE PRESENT. [TLV-TWA (8HR)  
FOR XYLENE = 100 PPM]

I attest that this copy is representative of the original in all respects.

James Wadatz  
James Wadatz  
President Marine Chemists, Inc.

In The Event Of Any Physical Or Atmospheric Changes Affecting The Gas-Free Condition Of The Above Spaces, Or If In Any Doubt, Immediately Stop All Work And Contact The Undersigned.

### Qualifications

Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

### Standard Safety Designations

**Safe For Men.** Means that in the compartment or space so designated: (a) The oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) Toxic materials in the atmosphere are within permissible concentrations; and (c) In the judgment of the Marine Chemist, the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**Safe For Fire.** Means that in the compartment so designated: (a) The concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (b) In the judgment of the Marine Chemist, the residues are not capable of producing a higher concentration than permitted by 1-3.2 (a) under existing atmospheric conditions in the presence of fire and while maintained as directed on the Marine Chemist's Certificate; and further, (c) All adjacent spaces have either been cleaned sufficiently to prevent the spread of fire, are satisfactorily inerted, or, in the case of fuel tanks, have been treated as deemed necessary by the Marine Chemist.

**Safe For Shipbreaking.** Means that the compartment so designated: (a) Shall meet the requirements of 1-5.1; and (b) In the judgment of the Marine Chemist, the residual combustible materials designated are not capable of producing fires beyond the extinguishing capabilities of the equipment on hand; and, (c) All adjacent compartments or spaces shall meet the requirements of 1-4.2 (c).

### Chemist's Endorsement

This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with the Standard For the Control of Gas Hazards on Vessels to Be Repaired, adopted by the National Fire Protection Association, and have found the condition of each to be in accordance with its assigned designation.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed Anthony Matthews 634  
Marine Chemist Cert. No.

The undersigned shipyard representative acknowledges receipt of this Certificate and understands the conditions and limitations under which it was issued.

Area Code 201  
656-7754

Tel. Nights: (212) 494-0778

# Marine Chemists, Inc.

P.O. BOX 166

Uptown Station

HOBOKEN, N. J. 07030

24 HOUR SERVICE

## MARINE CHEMIST'S CERTIFICATE

Survey Requested By American Industrial Marine

Vessel Two (2) - 550 gal (U/G)  
Type Vessel STORAGE TANKS U/G  
Location CAS CHEM

Owner or Agent CAS CHEM  
Test Method ISA 250-VISUAL  
Last Cargo Xylene Ethane

Date NOV. 9, 1984  
Time of Completion 11:00 AM  
Certificate No. 1

40 AVE. "A", BAYONNE, N.J. 07002

Two (2) - 550 gal  
Underground Storage Tanks

SAFE FOR MEN. WORK TO  
BE UNDERTAKEN, FILLING TANKS  
FOR DISPOSAL. TANKS HAVE BEEN  
CLEANED.

I attest that this copy is representative of the original in all respects.

*James Wadatz*  
James Wadatz

President Marine Chemists, Inc.

In The Event Of Any Physical Or Atmospheric Changes Affecting The Gas-Free Condition Of The Above Spaces, Or If In Any Doubt, Immediately Stop All Work And Contact The Undersigned.

### Qualifications

Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

### Standard Safety Designations

**Safe For Men.** Means that in the compartment or space so designated: (a) The oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) Toxic materials in the atmosphere are within permissible concentrations; and (c) in the judgment of the Marine Chemist, the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**Safe For Fire.** Means that in the compartment so designated: (a) The concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (b) in the judgment of the Marine Chemist, the residues are not capable of producing a higher concentration than permitted by 1-5.2 (a) under existing atmospheric conditions in the presence of fire and while maintained as directed on the Marine Chemist's Certificate; and further, (c) All adjacent spaces have either been cleaned sufficiently to prevent the spread of fire, are satisfactorily inerted, or, in the case of fuel tanks, have been treated as deemed necessary by the Marine Chemist.

**Safe For Shipbreaking.** Means that the compartment so designated: (a) Shall meet the requirements of 1-5.1; and (b) in the judgment of the Marine Chemist, the residual combustible materials designated are not capable of producing fires beyond the extinguishing capabilities of the equipment on hand; and, (c) All adjacent compartments or spaces shall meet the requirements of 1-5.2 (c).


### Chemist's Endorsement

This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with the Standard For the Control of Gas Hazards on Vessels to Be Repaired, adopted by the National Fire Protection Association, and have found the condition of each to be in accordance with its assigned designation.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed James Wadatz 617  
Marine Chemist Cart. No.

The undersigned shipyard representative acknowledges receipt of this Certificate and understands the conditions and limitations under which it was issued.



**Kramer**  
**Chemicals Inc.**  
P.O. Box 1299  
Millwood Station  
Clifton, N.J. 07012

NEW JERSEY: 201-471-9500  
609 AREA CODE ONLY - 800-522-4135  
N.Y., P.A., CT., MD., DE. - 800-631-8316

January 7, 1985

Mr. Leonard Goldman  
Environics  
46 Jackson Drive  
Cranford, New Jersey 07016

Dear Mr. Goldman:

The enclosed manifest number NJ0161088 represents a recent shipment from Caschem via Atlas Associates to Marisol, Inc. Atlas Associates is a subsidiary of Kramer Chemicals and is a certified hazardous waste hauler in New Jersey.

I trust this information is sufficient.

Very truly yours,

CHEMICAL DISPOSAL SERVICES

*Edward J. Russick*

Edward J. Russick

EJR/ljs

cc: Caschem - John Gudzak



YHW-001 (5/82)

STATE OF NEW JERSEY  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE MANIFEST

Please TYPE all information.

RT A: SEND TO DISPOSER'S STATE

DOCUMENT NO. NJ 0161088

GENERATOR NAME CasChem Inc.	PHONE (INCLUDE AREA CODE) 201-858-7900	EPA ID NO. NJ D 0 6 7 5 2 0 8 9 0
ADDRESS (STREET - CITY - STATE) 40 Ave A Bayonne, N.J.	ZIP CODE 07 0 0 2	
TRANSPORTER NO. 1 Atlas Associates (sub, Kramer Chem)	PHONE (INCLUDE AREA CODE) 201-684-0024	EPA ID NO. NJ D 0 6 5 8 2 5 3 4 1
ADDRESS (STREET - CITY - STATE) 109 Fifth Ave Paterson, N.J.	ZIP CODE 0 7 5 2 4	
TRANSPORTER NO. 2	PHONE (INCLUDE AREA CODE)	EPA ID NO.
ADDRESS (STREET - CITY - STATE)	ZIP CODE	
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY Marisol Inc.	PHONE (INCLUDE AREA CODE) 201-469-5100	EPA ID NO. NJ D 0 0 2 4 5 4 5 4 4
ADDRESS (STREET - CITY - STATE) 125 Factory Lane Middlesex, N.J.	ZIP CODE 0 8 8 4 6	

MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. \_\_\_\_\_ OF A TOTAL OF \_\_\_\_\_ THE FIRST MANIFEST DOCUMENT NO. IS NJ →

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS		EPA HAZ CODE	EPA WASTE TYPE
						NO.	TYPE		
Waste Xylene (R.O. 1000/454)	Flammable Liquid	1307	1	25,200	3	063	0 1	I	U 2 3 9

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

Lab #972 Xylene with Urethane Resins

7.25 lb/gal = estimated average NET drum weight 400 lb each

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above are consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

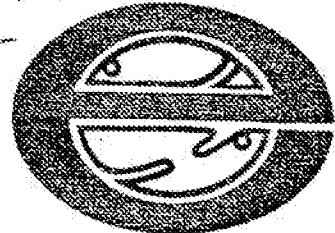
GENERATOR'S SIGNATURE <i>Casimir Witek</i> Casimir Witek	TITLE Safety Supervisor	DATE SHIPPED 08 22 84 MO DAY YR	EXPECTED ARRIVAL DATE 08 22 84 MO DAY YR
TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION I ACCEPT RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE <i>John Varholza</i> John Varholza	TRANSPORTER NO. 1 VEHICLE ID NO. N.J.S.W.A.S. 8477AE	DATE RECEIVED 08 22 84 MO DAY YR	



Mailed  
4/10/86

No Changes as 73

Copy to  
Tank Closure Feb 1986  
Project E



SSAP REVIEW

GasChem, Inc., Bayonne, New Jersey

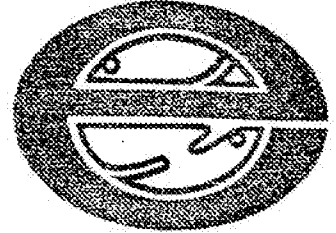
EPA ID NO. NJD 057 528 290

**environics incorporated/environmental consultants**

46 JACKSON DRIVE • CRANFORD, N.J. 07016-3580 • (201) 272-3770



March 24, 1987



Mr. Frank Coolick  
Assistant Director  
Hazardous Waste Regulation  
NJDEP  
Division of Hazardous Waste Mgmt.  
CN-028  
Trenton, NJ 08625

RE: Sample Plan Soil Borings and Analytical Results for  
CasChem, Inc., Bayonne, New Jersey

Dear Mr. Coolick:

Drilling at CasChem, Inc. for the sample plan soil borings commenced on 2/3/87 and terminated on 2/5/87. Borings B1 through B7 were logged for lithologies and sampled as specified by the Soil Sampling and Analysis Plan with some minor changes. All drilling was performed by Empire Soil Investigations of Edison, New Jersey using hollow stem augers and split spoons for sampling. All logging and sampling was performed by Envirionics staff.

Soil boring B6 was completed on the first day of drilling, 2/3/87. (Please refer to map for boring locations.) All sampling and logging for B6 was performed while under audit from DEP representative Denise Bear. The soils throughout the boring were fairly consistent, that of brown clay nature, intermixed with sand and pebbles. There was some odor noted in the soil samples. No water table was encountered.

Soil borings B5, B7, and B2 were completed on the second day of operations, 2/4/87. Borings B5 and B7 were very similar to boring B6 in terms of lithology, noticeable soil odor and the absence of a water table. It should be noted that the maximum depth of the drilling for boring B5 and B7 was 11'6", or 1'6" deeper than specified in the sample plan. This is due to insufficient recovery for sample analysis at the depth of 9'-10'. The soil composition in boring B2 was similar to that in B5, B7 and B7, although the odor from B2 soil was much weaker. B2 was drilled to a depth of 12' and no water table was encountered.

Borings B4, B3, and B1 were completed on the final day of drilling, 2/5/87. Boring B4 was drilled to 12' with the soil being similar to the soil in boring B2. One difference was the appearance of a water table at the deepest penetration. Boring B4 was the only boring of the seven to show a water table.

**envirionics incorporated/environmental consultants**

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TIERRA-B-016341

Borings B3 and B1 were completed later in the day. The location for boring B3 was moved approximately two feet to the east of the original location in order to avoid the old pipe lines under the concrete floor. Boring B3 was drilled to a depth of 12' and no water table was encountered. The location for boring B1 was also moved two feet to the east of it's original location due to an unidentified obstruction at approximately 6'. The lithology in boring B1 was somewhat different than the other borings in that larger cobbles were noted at the 7'-10' depths. This slowed drilling somewhat as there was higher resistance to the auger. Boring B1 was drilled to a depth of 12' and no water table was encountered.

Soil samples for analysis of xylene, petroleum hydrocarbons, and oil and grease were transferred to Garden State Laboratories, Irvington, New Jersey, on the morning of 2/6/87. Proper Chain of Custody procedures were followed for the transferral of the samples (see attached C.O.C.).

Results of the analysis were received at Environics on 3/12/87. The results varies for the parameters tested at each boring location. In general borings B1-B4 showed low or no levels of detectable xylene, while borings B5-B7 showed more significant levels of detectable xylene. In addition Boring B7 was the only boring to show petroleum hydrocarbon levels above the detection limit (<20mg/kg).

While oil and grease levels did show in all the borings, these results may be misleading. The reason for this is the fact that the freon extraction test used for oil and greas detection does not distinguish between naturally occuring oil and grease, and oil and grease present due to contamination. Additionally, clay type soils such as those at CasChem yield higher oil and grease values than non clay soils. Lab analysis reports for all parameters tested are enclosed.

If you have any questions or comments, please do not hesitate to call or write.

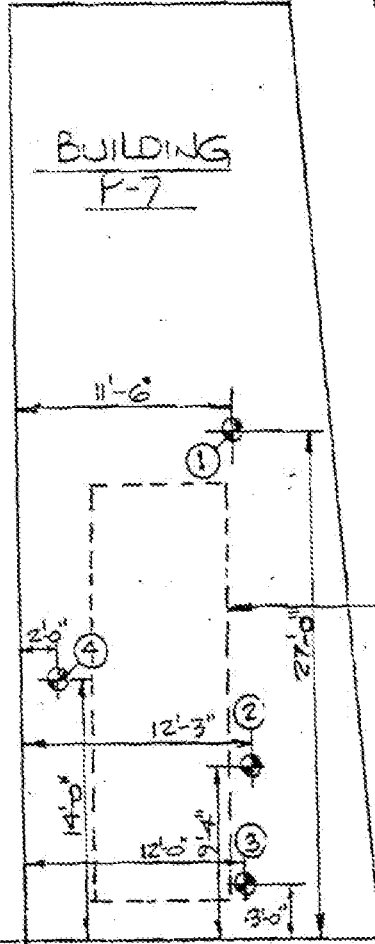
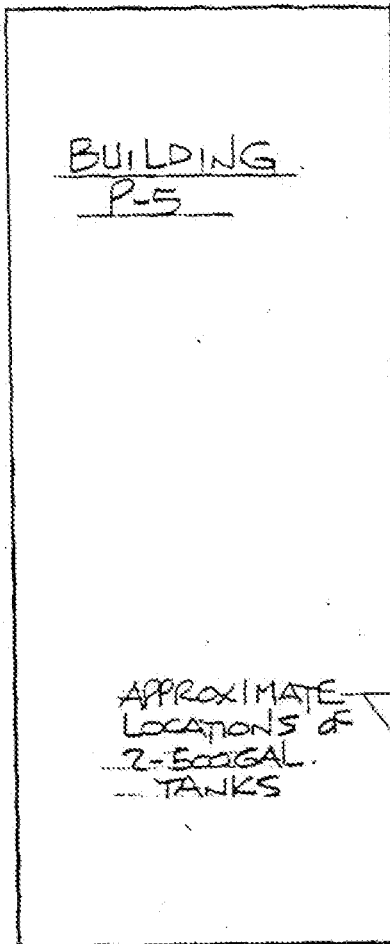
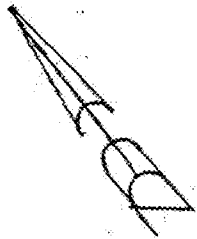
Very truly yours,

ENVIRONICS, INC.



Christopher J. Weiss  
Hydrogeologist

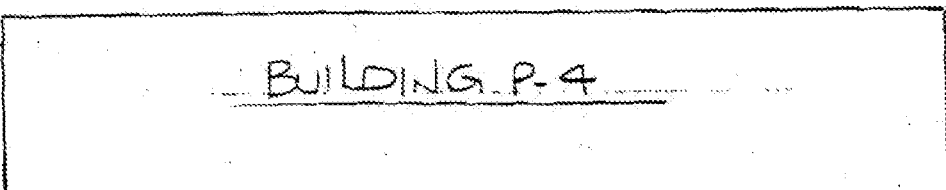
CJW:dd  
Enclosure



BAYONNE BRIDGE

APPROXIMATE  
LOCATIONS OF  
2-500 GAL.  
TANKS

APPROXIMATE  
LOCATION OF  
500 GAL  
TANK.



JOB NO. <b>E-1051-84</b>		<b>ENVIRONICS, INC.</b>	
PROJECT TITLE <b>CAS CHEM INC. TANK CLOSURE</b>		ENVIRONMENTAL CONSULTANTS	
SCALE <b>1"=10'-0"</b>	DRAWN BY <b>RG</b>	48 JACKSON DRIVE	CRANFORD, N.J. 07016
CHECKED BY <b>BED</b>	APPROVED BY <b>CW</b>	DRAWING TITLE <b>BORING</b>	DRAWING NO.
			REV.
			TIERRA-B-016343

# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

399 Stuyvesant Avenue

Irvington, N.J. 07111



MATHEW KLEIN, M.S., Director

Telephone  
201-373-8007

ENVIRONICS, INC.  
46 JACKSON DRIVE  
CRANFORD, NJ 07016

SAMPLES SUBMITTED: FRI. FEBRUARY 6, 1987

SOIL SAMPLES RE: CAS CHEM.  
INC. E-1051

RESULTS ARE IN MG/KG  
DRY WEIGHT.

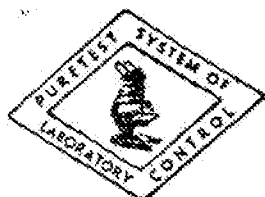
	PETROLEUM HYDROCARBON	OIL & GREASE
<u>FEBRUARY 5, 1987</u>		
B1 10-12'B	<20.	---
B1 10-12'C	---	787.
<u>FEBRUARY 4, 1987</u>		
B2 10-12'B	<20.	---
B2 10-12'C	---	759.
<u>FEBRUARY 5, 1987</u>		
B3 8'-10'B	<20.	---
B3 8'-10'C	---	902.
<u>FEBRUARY 5, 1987</u>		
B4 10'-12'B	<20.	---
B4 10'-12'C	---	773.
<u>FEBRUARY 4, 1987</u>		
B5 10.5'-11.5'B	<20.	---
B5 10.5'-11.5'C	---	756.
<u>FEBRUARY 3, 1987</u>		
B6 8'-10'B	<20.	---
B6 8'-10'C	---	712.
<u>FEBRUARY 4, 1987</u>		
B7 10.5'-11.5'B	214.	---
B7 10.5'-11.5'C	---	---

# GARDEN STATE LABORATORIES, INC.

*Bacteriological and Chemical Testing*

399 Stuyvesant Avenue

Irvington, N.J. 07111



MATHEW KLEIN, M.S., Director

Telephone  
201-373-8007

ENVIRONICS, INC.

46 JACKSON DRIVE

CRANFORD, NJ 07016

SAMPLES SUBMITTED: FRI. FEBRUARY 6, 1987

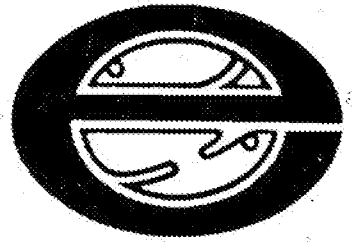
SOIL SAMPLES RE: CAS CHEM., INC. E-1051

RESULTS ARE IN UG/KG DRY WEIGHT.

	<u>TOTAL XYLENE</u>
B1 10-12'A 2/5/87	<1.0
B2 10-12'A 2/4/87	<1.0
B3 8'-10'A 2/5/87	13.5
B4 10'-12'A 2/5/87	<1.0
B5 10.5'-11.5'A 2/4/87	1,145.9
B6 8'-10'A 2/3/87	2,018.6
B7 10.5'-11.5A 2/4/87	234.3

CAS CHEM, INC.  
SOIL BORING LITHOLOGIES

B1 (2/5/87)	0-2'	Reddish Brown Sandy Clay Intermixed with Miscellaneous Fill
	2-12'	Reddish Brown Sandy Clay with Abundant Quartz Pebbles
B2 (2/5/87)	0-2'	Reddish Brown Sandy Clay Intermixed with Miscellaneous Fill
	2-8'	Reddish Brown Sandy Clay with Abundant Quartz Pebbles
	8-12'	Reddish Brown SANDY Clay with Lessening Amounts of Pebbles
B3 (2/5/87)	0-2'	Reddish Brown Sandy Clay Intermixed with Miscellaneous Fill
	2-12'	Reddish Brown Sandy Clay
	12'	Larger Cobbles; Refusal at 12 Feet
B4 (2/5/87)	0-2'	Reddish Brown Sandy Clay Intermixed with Miscellaneous Fill
	2-12'	Reddish Brown Sandy Clay
	12'	Groundwater Encountered at 12 Feet
B5 (2/4/87)	0-2'	Miscellaneous Fill
	2-4'	Reddish Brown Sandy Clay with Small Pebbles
	4-11'6"	Reddish Brown Sandy Clay
B6 (2/3/87)	0-2'	Reddish Brown Sandy Clay Intermixed with Miscellaneous Fill
	2-10'	Reddish Brown Sandy Clay with Silt
B7 (2/4/87)	0-2'	Reddish Brown Sandy Clay Intermixed with Miscellaneous Fill
	2-10'	Reddish Brown Sandy Clay



RESULTS OF THE SOIL  
SAMPLING AND ANALYSIS PLAN

CasChem, Inc.  
Bayonne, New Jersey

CP No. 85-25  
EPA ID No. NJD067520890

August, 1989

Soil Sampling  
Analysis  
VST-HW Report

**environics/environmental consultants**  
a division of envair services, inc.

46 JACKSON DRIVE • CRANFORD, NJ 07016-3580 • (201) 272-3770

TIERRA-B-016347

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## APPENDICES

Appendix A - Soil Boring Logs

Appendix B - Analytical Results



## 1.0 INTRODUCTION

CasChem, Inc. is located in Bayonne, New Jersey, at 40 Avenue A. The land use in the vicinity of the site is industrial. The property is approximately 1,200 feet east of Newark Bay, 1,400 feet north of Kill Van Kull, and adjacent to the right of way for the Bayonne Bridge (Figure 1.1).

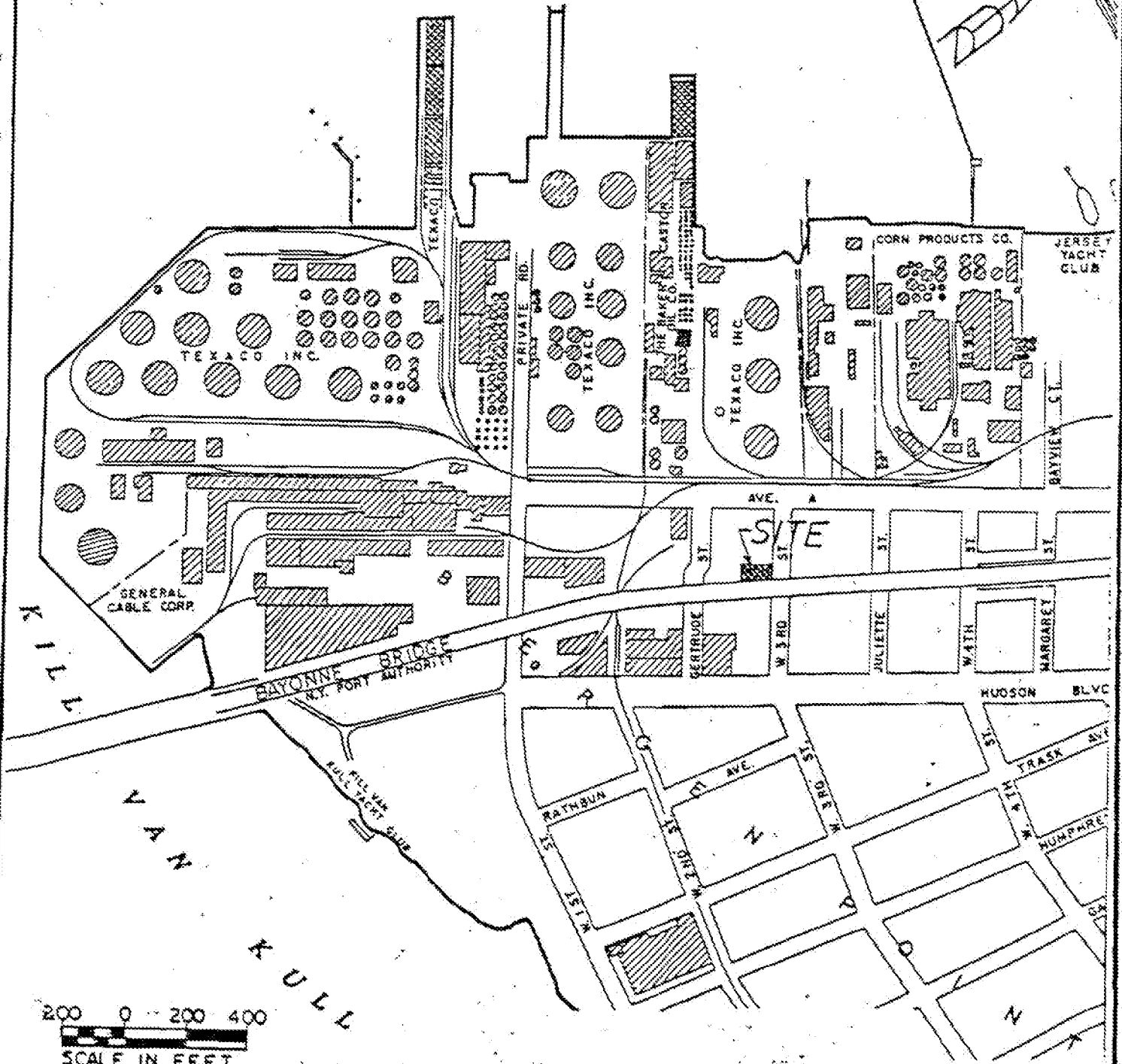
Three underground tanks, used for the temporary storage of recoverable xylene, were decommissioned in 1984. The Xylene was stored after being used to clean vessels which had contained various vegetable oil and mineral oils. Two 550 gallon capacity tanks and one 6,000 gallon capacity tank were removed from service, cleaned, and filled with concrete (Figure 2.1). The tanks were not removed from the ground due to their physical proximity to manufacturing facilities and jeopardizing the integrity of those structures.

A plan for sampling soil adjacent to and immediately beneath the three decommissioned tanks was submitted to the NJDEP on September 11, 1985, and revised in April, 1986, in compliance with N.J.A.C. 7:26-9.8(e)iiii. The plan was approved on November 19, 1986, executed in February, 1987, and the results submitted to the NJDEP on March 24, 1987.

A plan designed to delineate the extent of previously found contamination entitled "Extent of Contamination Soil Sampling and Analysis Plan" was submitted on August 27, 1987 to the NJDEP. This plan was subsequently declared deficient in a letter dated December 4, 1987. The revised "Extent of Contamination Soil Sampling and Analysis Plan" was submitted on January 6, 1988. Minor modifications were mutually agreed upon in May, 1988 and the revised plan was executed on June 9, 1988.

This report details the execution of the conditionally approved revised "Extent of Contamination Soil Sampling and Analysis Plan." Operations included the drilling, sampling, and analysis of soil borings.

N E W A R K



200 0 200 400  
 SCALE IN FEET

JOB NO. <b>E-1051-84</b>		<b>ENVIRONICS</b> ENVIRONMENTAL CONSULTANTS 48 JACKSON DRIVE      CRANFORD, N.J. 07016	
PROJECT TITLE <b>CAS CHEM INC.          TANK CLOSURE</b>		DRAWING TITLE <b>SITE LOCATION</b>	DRAWING NO. <b>1.1</b>
SCALE AS SHOWN DRAWN BY <i>[Signature]</i> CHECKED BY <b>PD</b> APPROVED BY <b>PD</b> DATE <b>9-5-85</b> PRINTED	REV. <b>0</b>		

## 2.0 SOIL BORINGS

Soil borings B1 through B7 were drilled on February 3, 4, and 5, 1987 in compliance with the approved "Tank Closure Soil Sampling Plan." A detailed account of the drilling operations, the soil boring logs and the laboratory analytical results were submitted to the NJDEP in a March 24, 1987 letter entitled "SSAP Review." Soil borings B9, B10, B11 were drilled on June 9, 1988 in compliance with the conditionally approved "Extent of Contamination Soil Sampling and Analysis Plan." The proposed boring B8 could not be drilled due to inaccessibility to that location. The locations of the ten borings can be seen on Figure 2.2. This section details the drilling operations, site geology and the laboratory analytic results.

### 2.1 Drilling Operations

Soil borings B1 through B7 were drilled on February 3, 4, and 5, 1987 and B9 through B11 on June 9, 1988 by Empire Soils Investigations of Highland Park, New Jersey, using steam-cleaned hollow stem augers. Soil samples were collected using steam-cleaned split spoon samplers. All logging and sampling was performed by Environics personnel. Borings B1 through B7 were continuously logged for lithologies and sampled as specified in the "Tank Closure Soil Sampling Plan" with some minor changes.

Borings B1 through B4 were proposed to advance to 12 feet below grade (2 feet below the tank bottom). Soil samples for analysis were collected from the 10 - 12 ft. interval in borings B1, B2, and B4. The 8 - 10 ft. interval sample was used for analysis in boring B3 because of a poor sample recovery of 0.1 ft. from the 10 - 12 ft. interval. Boring B1 was moved approximately two feet to the east of the proposed location due to an unidentified obstruction at approximately six feet. Boring B3 was also moved approximately two feet to the east of the proposed location to avoid pipelines under the concrete floor.

Borings B5 through B7 were proposed to advance to 10 feet below grade (2 feet below the tank bottoms). The 8 - 10 ft. interval sample was used for analysis in boring B6 as proposed. Borings B5 and B7 were sampled 1.5 feet deeper due to insufficient sample recovery at the 8 - 10 ft. interval.

Borings B9 through B11 were proposed in the "Extent of Contamination Soil Sampling and Analysis Plan" to advance to 10 feet below grade (2 feet below the tank bottom). The borings were logged for lithologies and sampled as specified. The 8 - 10 feet interval samples were used for analyses in borings B9 through B11.

At the completion of sampling all borings were backfilled with bentonite, then cut and grouted.

## 2.2 Site Geology

The soil in the area of the CasChem site is composed of urban fill and extensively reworked native soil. The native soil is derived from the red shales, siltstones, and sandstones of the Newark Basin. At the site the unconsolidated sediments varied from red-brown silty clays in the western borings and sandy clays in the central borings to sandy clays with quartz pebbles in the eastern borings. The lithologic logs for all the soil borings are included in Appendix A. Boring B4 encountered water at approximately 12 feet below grade. Boring B2 encountered a very moist zone at 12 feet below grade. No notable water conditions were found in the other borings.

The CasChem site sits on the eastern edge of the Newark Basin. The Newark Basin at this location overlies the Palisades diabase sill, an intrusive igneous formation.

## 2.3 Analytical Results

All soil boring samples were analyzed for Xylene (EPA Method 624), Petroleum Hydrocarbons (EPA Method 418.1), and Oil and Grease (EPA Method 413.1). Recoverable Xylene was the primary component temporarily stored in the underground tanks. The analyses for Petroleum Hydrocarbons and Oil and Grease were performed to detect the various vegetable oils which may have been present in the tanks.

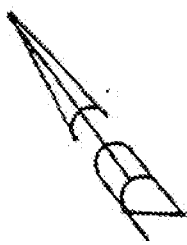
Samples collected for analyses were placed in laboratory prepared jars using laboratory cleaned sampling equipment. All samples were maintained at four degrees centigrade after collection and delivered to the laboratory within 24 hours of completion of the sampling operations. All analyses were performed by Garden State Laboratories, Inc. in Hillside, NJ (certification No. NJ07044). The full laboratory data package, including QA/QC information is in the accompanying volume. Field blanks for Oil and Grease were taken during the June 1988 sampling round but not during the February 1987 round. The results of the analytical tests are summarized in Appendix B and shown on Diagram 2.1.

The soil boring samples collected around the 6,000 gallon tank (B1 through B4) showed trace (.0135 ppm) to undetectable (<.001 ppm) amounts of Xylene. Soil samples taken adjacent to, south, and southwest of the two 550 gallon tanks (B5 through B11), exhibited Xylene concentrations in the range from .1973 to 2.0186 ppm.

The Total Petroleum Hydrocarbon (PHC) tests were negative (<20 ppm) for all sampled borings with the exception of B7. The B7 soil sample contained 214 ppm Total Petroleum Hydrocarbons.

The Oil and Grease analyses for borings B1 through B7, sampled in February 1987, exhibited values ranging from 712 ppm to 902 ppm. The soil samples from borings B9 through B11, sampled in June 1988, Oil and Grease showed values ranging from 50.3 ppm to 85.6 ppm. An order of magnitude difference in the apparent Oil and Grease values exists between the first (B1 through B7) and second round of samples (B9 through B11).

	754
	902
	712
	214
	85.6
	50.3



BAYONNE BRIDGE

BUILDING P-5

BUILDING P-7

Xylene <.001 ppm  
PHC <20 ppm  
O&G 773 ppm

Xylene <.001 ppm  
PHC <20 ppm  
O&G 787 ppm

Xylene 1.1459 ppm  
PHC <20 ppm  
O&G 756 ppm

APPROXIMATE  
LOCATIONS OF  
2-550 GAL.  
TANKS

Xylene 2343 ppm  
PHC 214 ppm  
O&G 714 ppm

APPROXIMATE  
LOCATION OF  
6000 GAL  
TANK

Xylene <.001 ppm  
PHC <20 ppm  
O&G 759 ppm

Xylene .0135 ppm  
PHC <20 ppm  
O&G 902 ppm

Xylene 2.0186 ppm  
PHC <20 ppm  
O&G 712 ppm

Xylene .355 ppm  
PHC <20 ppm  
O&G 67.9 ppm

Xylene .197 ppm  
PHC <20 ppm  
O&G 50.3 ppm

Xylene .618 ppm  
PHC <20 ppm  
O&G 85.6 ppm

BUILDING P-4

**EXPLANATION**

LOCATIONS OF  
BORINGS DRILLED

◆ FEB 1987

◆ JUNE 1988

SCALE 1"=10'-0"	JOB NO. 3-1051-84	ENVIRONICS ENVIRONMENTAL CONSULTANTS	
DRAWN BY RG	PROJECT TITLE	48 JACKSON DRIVE	CRANFORD, N.J. 07018
CHECKED BY RMB	CAS CHEM INC.	DRAWING TITLE	DRAWING NO.
APPROVED BY DAS	TANK CLOSURE	BORING LOCATIONS	2.1
DATE JUNE 1989	BAYONNE BRIDGE		REV.

### 3.0 SUMMARY, CONCLUSIONS, AND RECOMMENDATIONS

#### 3.1 Summary

This report has detailed the execution of the conditionally approved "Extent of Contamination Soil Sampling and Analysis Plan - 1988 Revision." All sampling and analyses was performed in accordance with that plan and applicable regulatory guidelines and regulations. Ten soil borings were sampled in areas adjacent to three closed underground tanks formerly used to store waste Xylene. Soil samples were collected from 8 to 12 feet below grade. This depth interval defines the area below the tank bottoms and above the water table. All samples were analyzed for Xylenes, Total Petroleum Hydrocarbons, and Oil and Grease.

#### 3.2 Conclusions

The results of the soil investigation indicate that a minor discharge of Xylene has occurred in the area. Specifically, slightly elevated levels of Xylene were exhibited by samples collected directly adjacent to, south, and southwest of the two 550 gallon tanks. Soil samples from borings 5 and 6 were the only Xylene analyses to exceed the stringent NJDEP ECRA action level for Total Volatiles of 1.0 ppm. Total Xylene concentrations of approximately 1.15 and 2.02 ppm were detected in samples from borings 5 and 6, respectively.

The results of the Total Petroleum Hydrocarbon tests were negative with the exception of sample B7 which showed a total PHC concentration of 214 ppm.

The results from the Oil and Grease analyses are inconclusive. The concentration values for borings B1 through B7 are an order of magnitude larger than borings B9 through B11. The Oil and Grease values, however, show absolutely no correlation with the Xylene and PHC results. The values do, however, correlate with the sampling and analysis dates and more distal locations of borings B9 through B11.

The Oil and Grease values do not necessarily represent distinct chemical elements, ions, compounds, or even groups of compounds. The Oil and Grease test (USEPA Method 413.1) gives positive results for any substance soluble in Trichlorofluoroethane. In addition to the targeted vegetable oils and mineral oils, these substances include sulfur and sulfur compounds, chlorophyll and certain naturally occurring organic compounds.

The Oil and Grease test method was employed because the spent Xylene in the underground tanks was used to clean vessels which had contained various vegetable oils and mineral oils and therefore may have contained small amounts of these oils. We conclude that, from the lack of correlation between the Oil and Grease values with the Xylene and PHC values in conjunction with the reasons given above (especially that the Oil and Grease method will give a positive result to naturally occurring organic compounds) the validity of the Oil and Grease results are questionable in confirming the presence of discharged mineral oils and vegetable oils.

### 3.3 Recommendations

This investigation has shown that only minor Xylene contamination is present in the area of the closed tanks. The concentrations of Xylene and PHC in the soils are either less than or only slightly elevated above the stringent NJDEP action levels for evaluating possible ECRA cleanup requirements. The site is surrounded by industry, the soils in the area are urban fill and reworked natural soils and the water table aquifer in the area is not used for potable purposes. Based on the factors discussed above, no further investigation or removal of soil is recommended.





-S L BORING RECORD

EXPLORATION FOR _____	LOCATION
DATE <u>2-5-87</u>	CasChem, Inc.
BORING No. <u>B2</u>	Bayonne, N.J.
RECORD BY <u>Christopher Weiss, Environics</u>	WATER TABLE
DRILL TYPE <u>Auger</u>	Not Encountered
WEATHER _____	

SAMPLE No.	TYPE TEST	DEPTH		No. OF BLOWS	SOIL DESCRIPTION AND BORING LOG
		From	To		
		0	2'		Reddish brown sandy clay intermixed with miscellaneous fill - no recovery
		2	4'		Reddish brown sandy clay with abundant quartz pebbles - 1.0' recovery
		4	6'		same as above - no recovery
		6	8'		same as above - 0.2' recovery
		8	10'		same as above - 1.7' recovery
B2		10	12'		same as above - 1.9' recovery sample is moist

REMARKS

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# SOIL BORING RECORD

EXPLORATION FOR _____				LOCATION  CasChem, Inc. Bayonne, N.J.	
DATE <u>2-5-87</u>				WATER TABLE  12.0'	
BORING No. <u>B4</u>					
RECORD BY <u>Christopher Weiss, Environics</u>					
DRILL TYPE <u>Auger</u>					
WEATHER _____					
SAMPLE No.	TYPE TEST	DEPTH		No. OF BLOWS	SOIL DESCRIPTION AND BORING LOG
		From	To		
		0	2'		Reddish brown sandy clay intermixed with miscellaneous fill - 0.6' recovery
		2	6'		Reddish brown sandy clay
		6	8'		same as above - 1.6' recovery
		8	10'		same as above - 1.0' recovery
B4		10	12'		same as above - 1.8' recovery
REMARKS <u>Watertable encountered at approximately 12 ft.</u>					

# SOIL BORING RECORD

EXPLORATION FOR _____	LOCATION
DATE <u>2-4-87</u>	CasChem, Inc. Bayonne, N.J.
BORING No. <u>B5</u>	WATER TABLE  Not Encountered
RECORD BY <u>Christopher Weiss, Environics</u>	
DRILL TYPE <u>Auger</u>	
WEATHER _____	

SAMPLE No.	TYPE TEST	DEPTH		No. OF BLOWS	SOIL DESCRIPTION AND BORING LOG
		From	To		
		0	2'		Miscellaneous fill - 0.1' recovery
		2	4'		Reddish brown sandy clay with small pebbles 0.9' recovery
		4	6'		Reddish brown sandy clay
		6	8'		same as above - 1.7' recovery
		8	10'		same as above - 0.2' recovery
B5		10 $\frac{1}{2}$	11 $\frac{1}{2}$		same as above - 1.7' recovery

REMARKS

# - COIL BORING RECORD

EXPLORATION FOR _____	LOCATION
DATE <u>2-3-87</u>	CasChem, Inc. Bayonne, N.J.
BORING No. <u>B6</u>	WATER TABLE  Not Encountered
RECORD BY <u>Christopher Weiss, Environics</u>	
DRILL TYPE <u>Auger</u>	
WEATHER _____	

SAMPLE No.	TYPE TEST	DEPTH		No. OF BLOWS	SOIL DESCRIPTION AND BORING LOG
		From	To		
		0	2'	1, 3 6, 9	Reddish brown silty clay intermixed with miscellaneous fill - 0.8' recovery
		2	4'	7,12 16,18	same as above - 1.4' recovery
		4	6'		Reddish brown silty clay - 0.9' recovery
		6	8'		Reddish brown sandy clay - 1.9' recovery
B6		8	10'		same as above - 1.9' recovery

REMARKS









# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

399 Stuyvesant Avenue

Irvington, N.J. 07111



MATHEW KLEIN, M.S., Director

Telephone  
201-373-8007

ENVIRONICS  
46 JACKSON DRIVE  
CRANFORD, NJ 07016

SOIL SAMPLES RE: CAS CHEM., INC. E-1051

RESULTS ARE IN UG/KG DRY WEIGHT.

	<u>TOTAL XYLENE</u>
B1 10'-12'A 2/5/87	<1.0
B2 10'-12'A 2/4/87	<1.0
B3 8'-10'A 2/5/87	13.5
B4 10'-12'A 2/5/87	<1.0
B5 10.5'-11.5'A 2/4/87	1,145.9
B6 8'-10'A 2/3/87	2,018.6
B7 10.5'-11.5A 2/4/87	234.3
B9 8'-10' 6/9/88	355.0
B10 8'-10' 6/9/88	618.0
B11 8'-10' 6/9/88	197.3

THE LIABILITY OF GARDEN STATE LABORATORIES, INC. FOR SERVICES RENDERED SHALL IN NO EVENT EXCEED THE AMOUNT OF THE INVOICE.

Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J.D.E.P. - Lab #07044

TIERRA-B-016366

# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

410 Hillside Avenue  
Hillside, NJ 07205

Telephone (201) 688-8900  
Fax (201) 688-8986



MATHEW KLEIN, M.S., Director  
JARVEY KLEIN, M.S., Lab Supervisor

Enviro-nics  
46 Jackson Drive  
Cranford, NJ 07016

Samples Submitted: Fri. June 10, 1988  
Re: Cas Chem. 3-1051

## Soil Samples

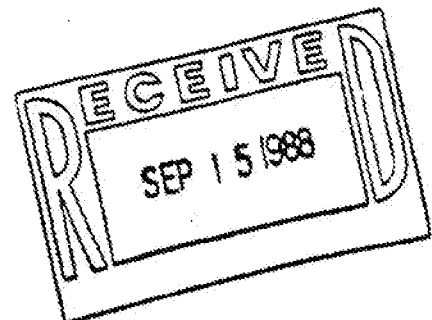
Results are in mg/kg dry weight.

		<u>Petroleum Hydrocarbon</u>	<u>Oil/Grease</u>
B9 8'-10'	11:45	<20.	67.9
B10 8'-10'	"	<20.	85.6
B11 8'-10'	15:00	<20.	50.3

## Water Sample

Results are in mg/l

		<u>Petroleum Hydrocarbon</u>	<u>Oil/Grease</u>
B10 Field Bl.	14:30	<1.	2.6



LIABILITY OF GARDEN STATE LABORATORIES, INC. FOR SERVICES RENDERED SHALL IN NO EVENT EXCEED THE AMOUNT OF THE INVOICE.

Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J.D.E.P.—Lab #07044

TIERRA-B-016367

*NJDEP NO FURTHER ACTION LETTER, SEPTEMBER 3, 1992*



A Ejsco Infrastructure Services Company



State of New Jersey  
Department of Environmental Protection and Energy  
Environmental Regulation  
Hazardous Waste Regulation Program  
CN 028  
Trenton, NJ 08625-0028  
Phone# 609-633-1418

RECEIVED

SE:

A. C. EILENDER

Scott A. Weiner  
Commissioner

Frank Coolick  
Administrator

Albert L. Eilender, President  
CasChem, Inc.  
40 Avenue A  
Bayonne, NJ 07002

SEP 03 1992

RE: Delisting from Treatment, Storage and Disposal (TSD) Status, CasChem, Inc., Bayonne, Hudson County, EPA ID No. NJD 067 520 890, NJ Project No. CP-85-25.

Dear Mr. Eilender:

This is a followup to the Bureau of Hazardous Waste Engineering's (Bureau) June 28, 1991 letter issued to CasChem, Inc. (facility). In this letter the Bureau accepted the closure certification for the underground hazardous waste storage tanks (UST) by the owner/operator and a professional engineer registered in the State of New Jersey. The certification documented that CasChem, Inc. completed all closure procedures in accordance with the closure plan approval letter dated November 19, 1986. The Bureau's letter also stated that the hazardous waste storage in tanks activity can be delisted from TSD status only after the remediation of soil contamination around and beneath the UST has been done to a level acceptable to the Department.

Because of this soil contamination in the UST area, the facility was referred to the Department's Site Remediation Group on December 2, 1991. The Bureau is in receipt of a memorandum dated August 21, 1992 from the Division of Responsible Party Site Remediation's Metro Field Office confirming that no additional remediation of residual xylene is needed in the UST area. Therefore, the Department concludes that no further action pertaining to soils around and beneath the UST area is necessary.

The facility filed a Part A permit application with the USEPA on December 8, 1981 for S01 (storage of hazardous waste in containers) and S02 (storage of hazardous waste in tanks) activities.

The Bureau delisted the S01 activity on December 6, 1991. This activity was delisted because it was listed in the Part A permit application in error.

The facility submitted a closure plan dated May 30, 1986 for the purpose of delisting S02 activity from treatment, storage and disposal status. Based on the documentation of closure of S02 activity as described above, CasChem, Inc. which is identified by the USEPA identification number NJD 067 520 890 is excluded from permitting requirements under N.J.A.C. 7:26-1 et seq..

Albert L. Eilender, President  
Page 2

If you have any questions on this matter, please contact Bob Patel of my staff at (609) 292-9880.

Very truly yours,

Thomas Sherman, Chief  
Bureau of Hazardous Waste Engineering

EP9/cfd

c: Michael Poetzsch, USEPA  
Yacoub E. Yacoub, DRPSR-MRO  
Peter T. Lynch, MBWHWEFO  
Gordon Beaver, BHWE

DOCUMENT: CASCHEM  
FOLDER: CFDMOB

**APPENDIX 25**  
**LIST OF ADDITIONAL PERMITS**



A Tyco Infrastructure Services Company

Agency	Reason for Permit	ID Number	Application Date	Approval Date or Application Status	Permittee Name and Address	Reason for Denial (if applicable)	Expiration Date
NJDEP	Laboratory Certification	09579	Unknown	Approved	Caschem, Inc. 40 Avenue A Bayonne, NJ 07002	N/A	06/30/04
United States Of America Department Of Transportation, Research and Special Program Admin.	Hazardous Materials Certificate Registration	070803 004 018L	Unknown	Approved	Caschem, Inc. 40 Avenue A Bayonne, NJ 07002	N/A	06/30/04
Hudson Regional Health Commission	Registration of Air Emission Sources	0101505	Unknown	Approved	Caschem, Inc. 40 Avenue A Bayonne, NJ 07002	N/A	12/31/05
State Of New Jersey Department Of Community Affairs, Division Of Fire Safety	Manufacture, Processing, or Blending of Class I Flammable Liquids	0901-45508-001-01	Unknown	Approved	Caschem, Inc. 40 Avenue A Bayonne, NJ 07002	N/A	Unspecified
State Of New Jersey Department Of Community Affairs, Division Of Fire Safety	Aboveground Aggregate Storage OF 1,000,000 Gallons or More But Less Than 5,000,000 Gallons of Class I Flammable Liquids	0901-45508-001-02	Unknown	Approved	Caschem, Inc. 40 Avenue A Bayonne, NJ 07002	N/A	Unspecified
State Of New Jersey Department Of Community Affairs, Division Of Fire Safety	Storage Of More Than 2,500 Cubic Feet Gross Volume Of Combustible Empty Assembled Packing Cases, Boxes, Barrels, Pallets In A Building Not Already Registered As A Warehouse Or Factory	0901-45508-002-01	Unknown	Approved	Caschem, Inc. 40 Avenue A Bayonne, NJ 07002	N/A	Unspecified



A Tyco Infrastructure Services Company





**APPENDIX 26**  
**ENFORCEMENT ACTIONS SUMMARY TABLE**

Date	Section of statute violated	Description of Violation	Agency that issued Violation	Type of Enforcement	How the violation was resolved	Date the violation was resolved
October 1989	40 CFR 700-799	Late inventory reporting of approximately 31 chemicals and the failure to file a premanufacturing notice for another chemical.	United States Environmental Protection Agency	Proposed fine of \$517,000	CasChem and USEPA entered into settlement under which CasChem paid a \$180,000 penalty and implemented voluntary pollution reduction and toxic source reduction projects for a credit of \$125,000.	Late 1993
6/21/1990	33 USC 1321(b)(3) 33 USC 1321(b)(6) 40 CFR 110.3	Discharge of approximately three gallons of castor oil into the Newark Bay, Bayonne, NJ due to broken pipe fitting.	US Coast Guard First Coast Guard District 408 Atlantic Avenue Boston, MA 02210	Civil Penalty	Sheen cleaned up by Ken's Marine and pipe fitting was repaired.	
6/21/1990	N.J.S.A. 23:5-28	Discharge of approximately three gallons of castor oil into the Newark Bay, Bayonne, NJ due to broken pipe fitting.	New Jersey Department of Environmental Protection	Civil Penalty	Sheen cleaned up by Ken's Marine and pipe fitting was repaired.	
1/15/1990	33 USC 1321(b)(3) 33 USC 1321(b)(6) 40 CFR 110.3	Discharge of approximately two gallons of castor oil into the Newark Bay, Bayonne, NJ due to tank overflow in waste water treatment system.	US Coast Guard First Coast Guard District 408 Atlantic Avenue Boston, MA 02210	Civil Penalty	Fine payed and sheen was cleaned by Ken's Marine.	
3/22/1990	33 USC 1321(b)(3) 33 USC 1321(b)(6) 40 CFR 110.3	Discharge of approximately twenty gallons of castor oil soap into the Newark Bay, Bayonne, NJ due to a leak in the hot oil line.	US Coast Guard First Coast Guard District 408 Atlantic Avenue Boston, MA 02210	Civil Penalty	Sheen cleaned up by Ken's Marine and pipe fitting was repaired and fine payed.	
9/6/1990	N.J.S.A. 23:5-28	Discharge of 150 to 200 pounds of non-hazardous castorwax to the Newark Bay.	New Jersey Department of Environmental Protection Division of Fish, Game and Wildlife.	Summons to Superior Court of New Jersey		
8/7/1991	7:26-9.3(a)1	Failing to dispose of hazardous waste containers within 90 days storage time limit.	New Jersey Department of Environmental Protection - Division of Hazardous Waste Management	Summons to Bayonne Municipal Court		
3/16/1989	7:31-2.6( c)	Unknown	New Jersey Department of Environmental Protection	Civil Penalty (\$2000)	Paid fine	9/15/1992
1994	Rexource Conservation and Recovery Act	Storage of one drum of material determined to be hazardous waste beyond permitted periods.	United States Environmental Protection Agency	Fine	CasChem and U.S. Attorney's Office, entered into settlement agreement under which CasChem pled guilty to and paid a \$1,000,000 penalty	1994 or later

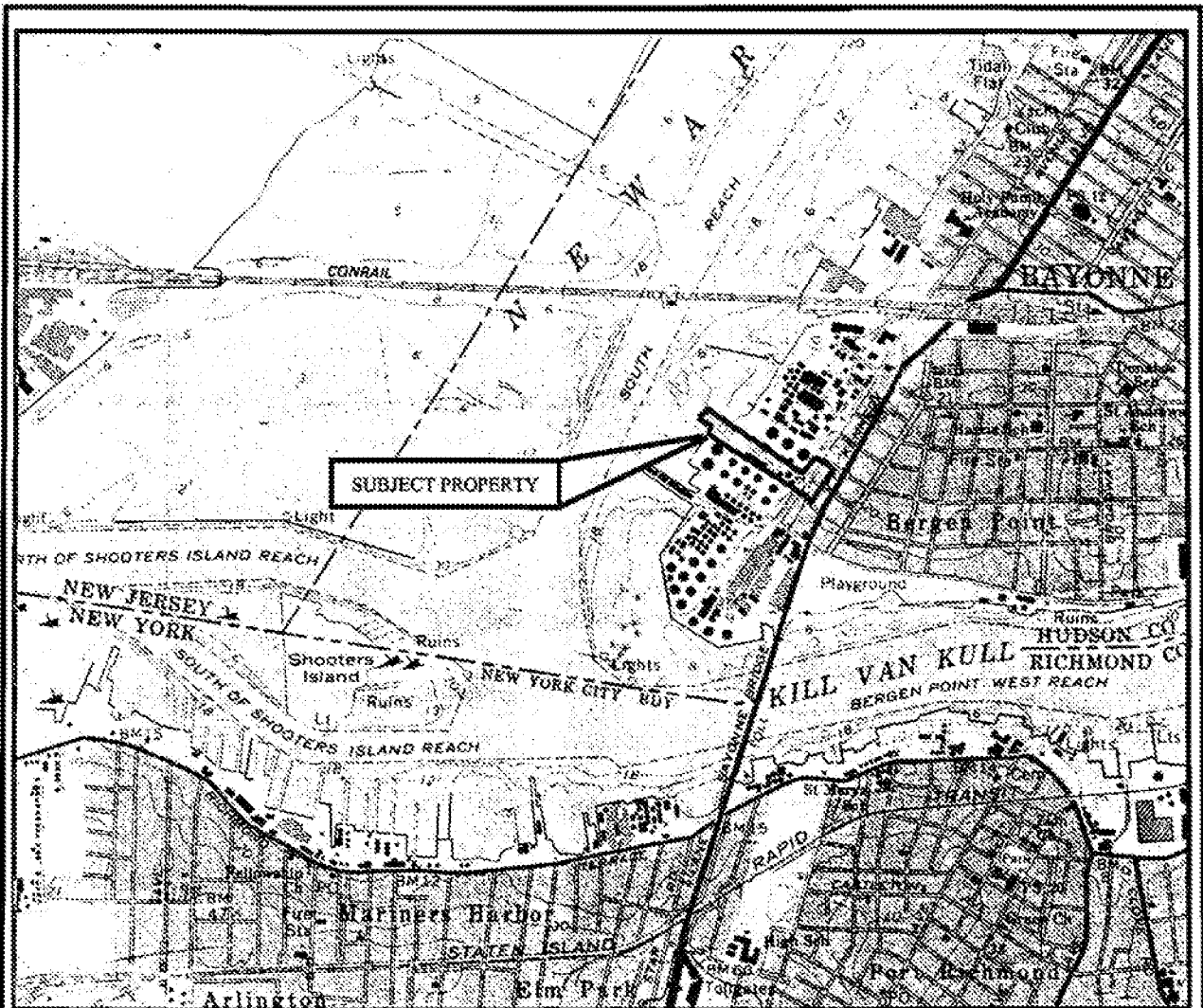
ate	Section of statute violated	Description of Violation	Agency that Issued Violation	Type of Enforcement	How the violation was resolved	Date the violation was resolved
1/31/2001	N.J.S.A. 7:27-8.3(e)	Exceeded annual usage permit allowable of 10 lbs/year for acid pollutant category from the lab R and D.	New Jersey Department of Environmental Protection Air Compliance and Enforcement Metropolitan Regional Office 2 Babcock Place West Orange, NJ 07052	Administrative Order and Notice of Civil Administrative Penalty Assessment	Paid fine and CasChem will be more diligent in tracking usage and annual reporting.	8/9/2001
96, 5/1/99 31/99	N.J.S.A.	Exceeded net effluent limitaion of 10 mg/l for oil and grease and exceeded net effluent limitation of 20 mg/l for Total Suspended Solids for NJPDES No. NJ0000949	NJDEP Northern Bureau of Water Compliance and Enforcement 1259 Route 46, Building 2 Parsippany, NJ 07054	Civil Penalty (\$3000)	Settlement agreement	11/15/2002
January 2001	CasChem permit to discharge to Passaic Valley Sewerage Commission (PVSC)	Summons filed in Superior Court of New Jersey alleged that CasChem discharged wastewater to the PVSC in excess of certain levels set forth in CasChem permit to discharge to PVSC Treatment Plant.	Passaic Valley Sewerage Commission/Superior Court of New Jersey	Fine	Settlement agreement, CasChem paid \$5,000 in penalties and agreed to continue to implement measures to prevent non-compliance	March 2001
3/15/2002	N.J.S.A. 7:17-2.4(a)	Failure to mark factory pipes containing hazardous substances to indicate the substances transferred through them	NJDEP Division of Waste Compliance and Enforcement and Release Prevention	Warning Letter	Piping labeled	10/31/2002
3/16/2002	N.J.S.A. 7:17-2.4(a)	Failure to mark factory pipes containing hazardous substances to indicate the substances transferred through them	NJDEP Division of Waste Compliance and Enforcement and Release Prevention	Warning Letter	Piping labeled	10/31/2002

**APPENDIX 27**

**FIGURES**

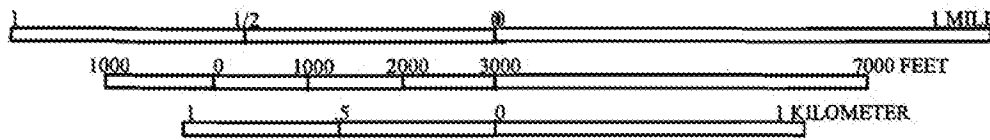


*A Tyco Infrastructure Services Company*

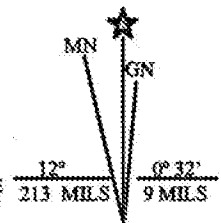


ELIZABETH, NEW JERSEY-NEW YORK QUADRANGLE (1981)

U.S.G.S. 1:24 000 SCALE TOPOGRAPHIC MAP




CONTOUR INTERVAL 20 FEET



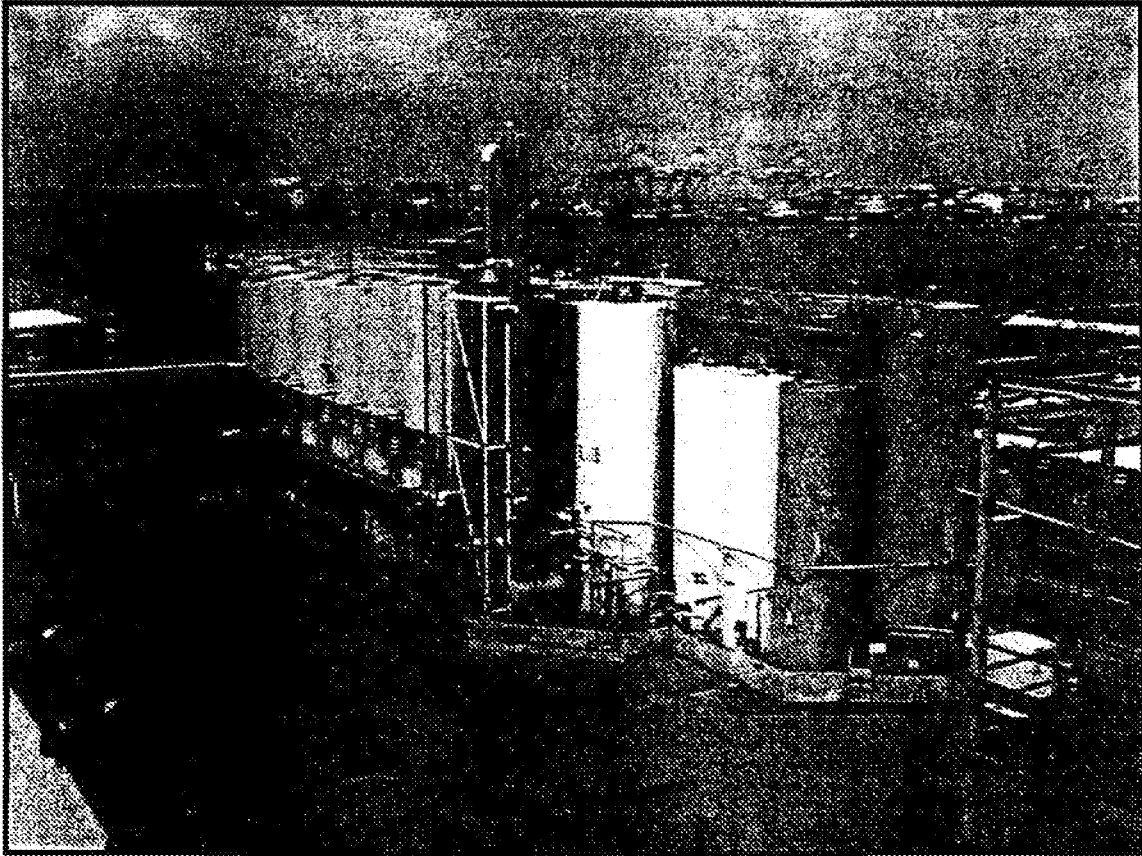
UTM GRID & 1981  
MAGNETIC NORTH  
DECLINATION AT  
CENTER OF SHEET

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

 A tyco INTERNATIONAL LTD. COMPANY	PROJECT: <b>Preliminary Assessment Report</b> <b>CasChem, Inc.</b> 40 Avenue A Bayonne, New Jersey 07002 Lat. 40° 38' 21.45" Long. 74° 8' 27.99"	<b>SITE LOCATION MAP</b>  Project No: 74509  Figure No: 1


**APPENDIX 28**  
**PHOTOGRAPHS**

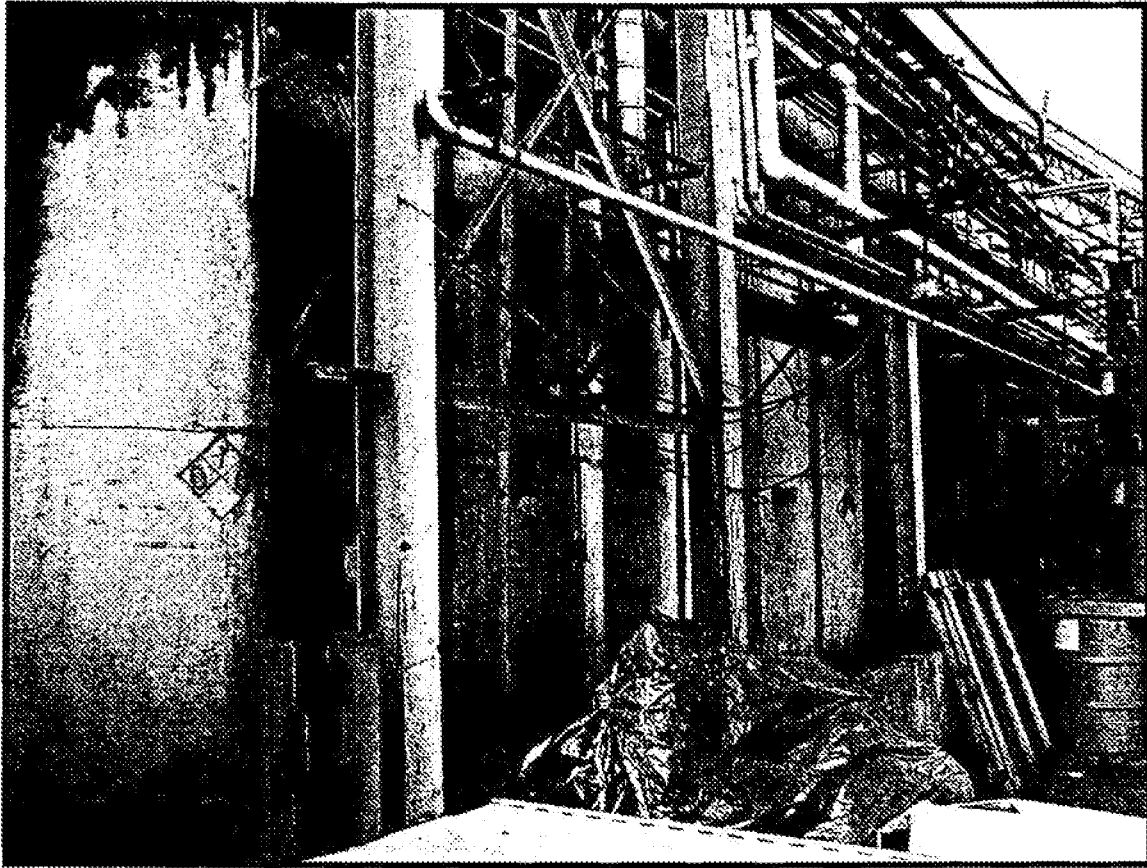


The Northwest Tank Farm facing south.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 1 Project: 74509</p>
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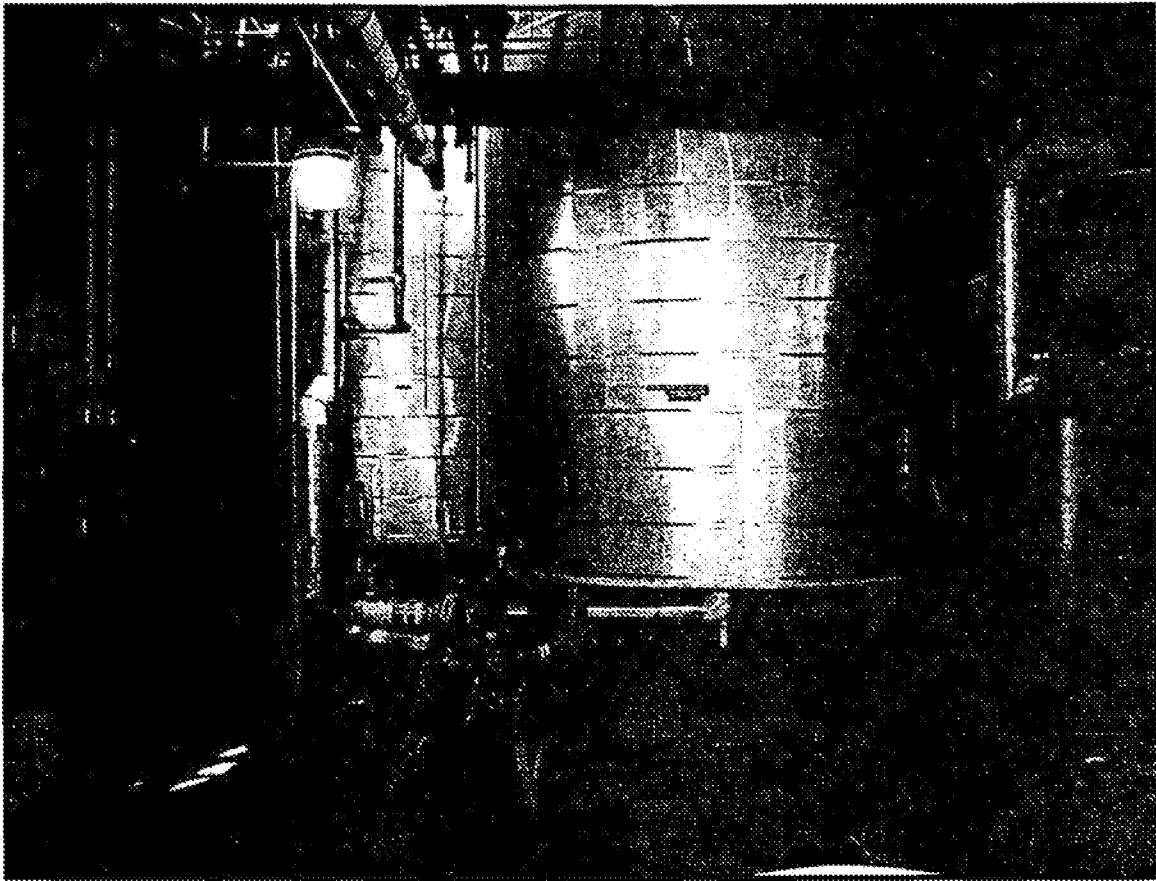
A fuel oil AST and three empty ASTs in a concrete dike outside Building 25.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 2 Project: 74509</p>
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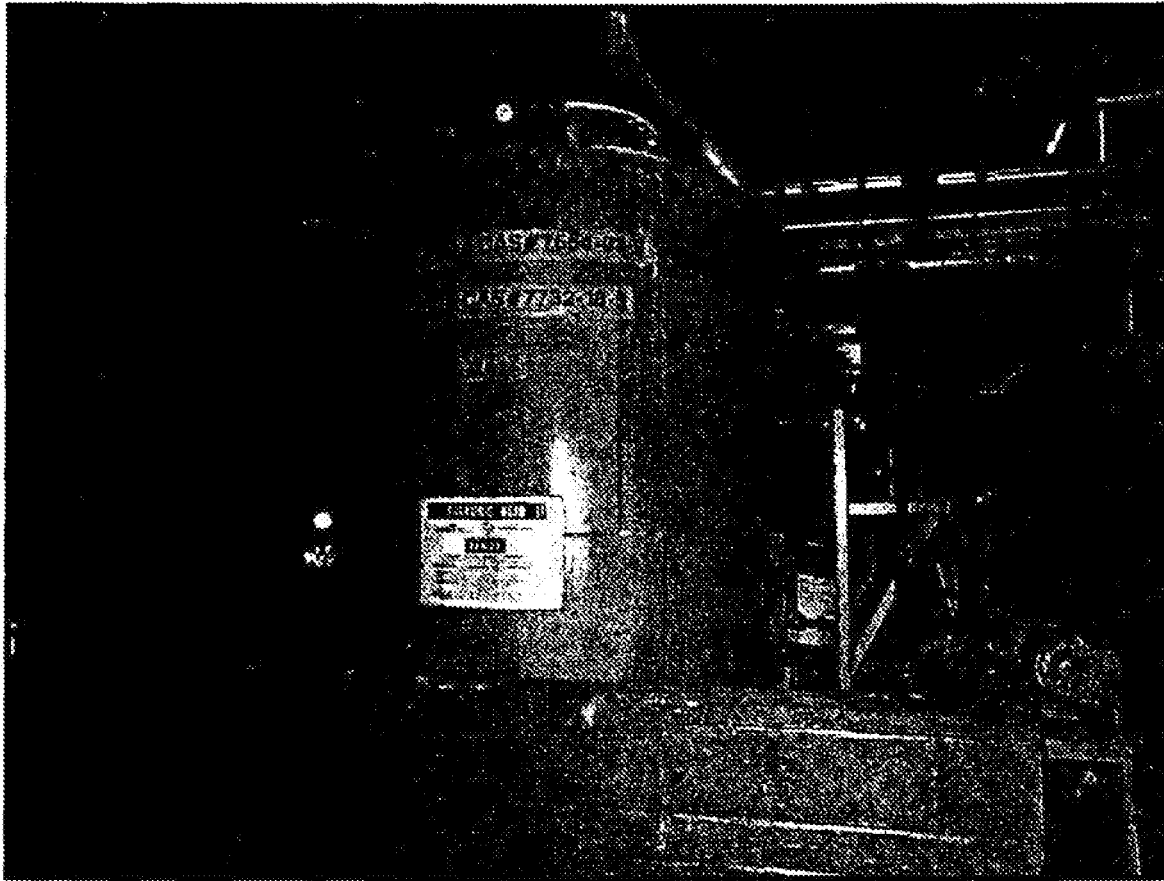


Process tanks containing Bufferite 230 (5,000-gallon each) at Building #38.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A tyco INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 3</p> <p>Project: 74509</p>
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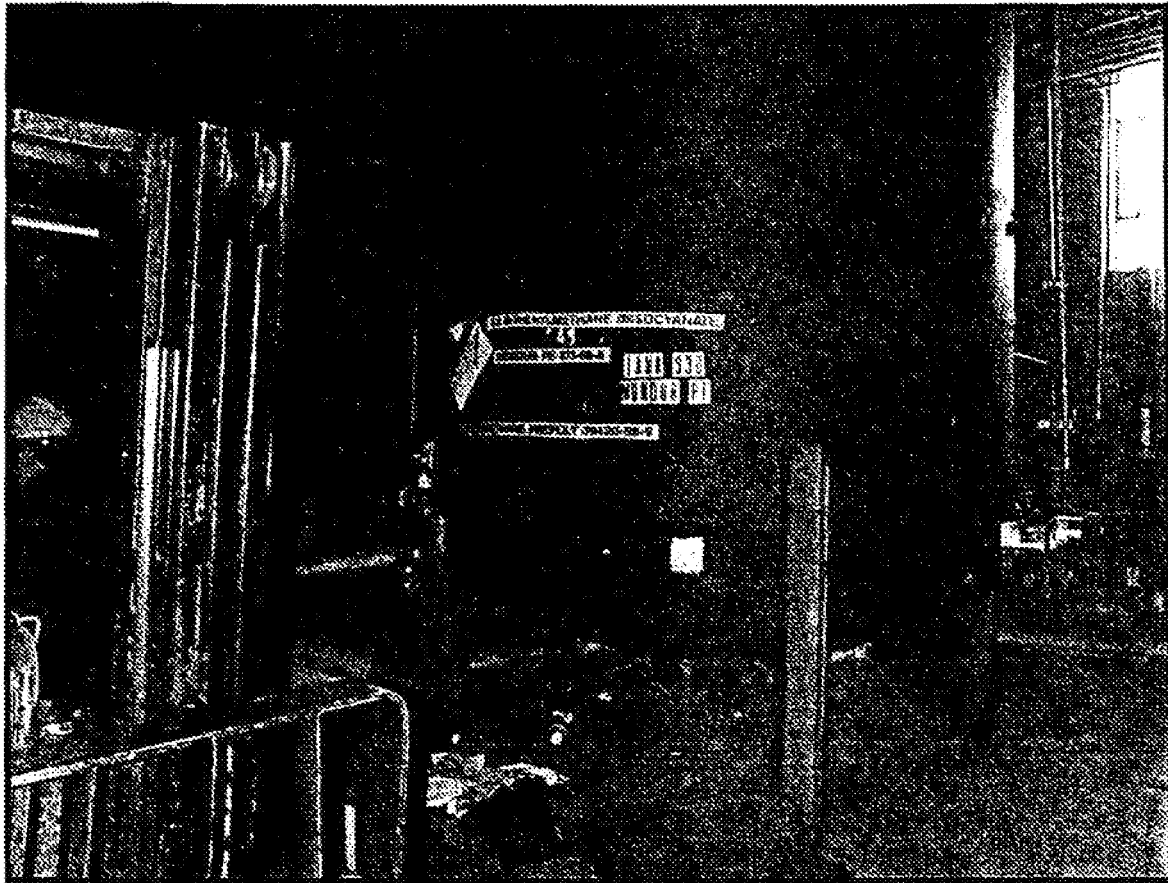


Sulfuric Acid Tank at Building #26.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 4</p> <p>Project: 74509</p>
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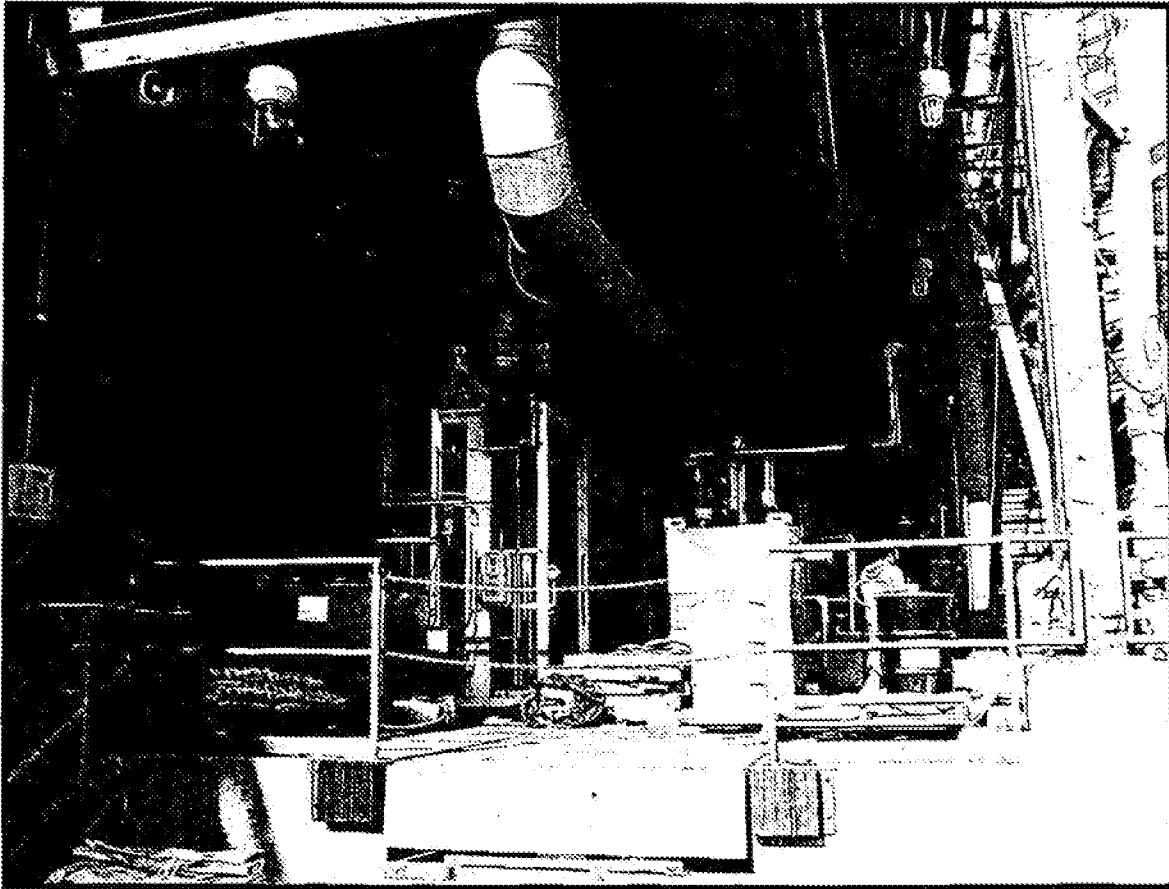
Former Toluene Diisocyanate (TDI) tank at Building #6A.

*Done / P.A.L.  
2/1/00*

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <i>tyco</i> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 5</p> <p>Project: 74509</p>
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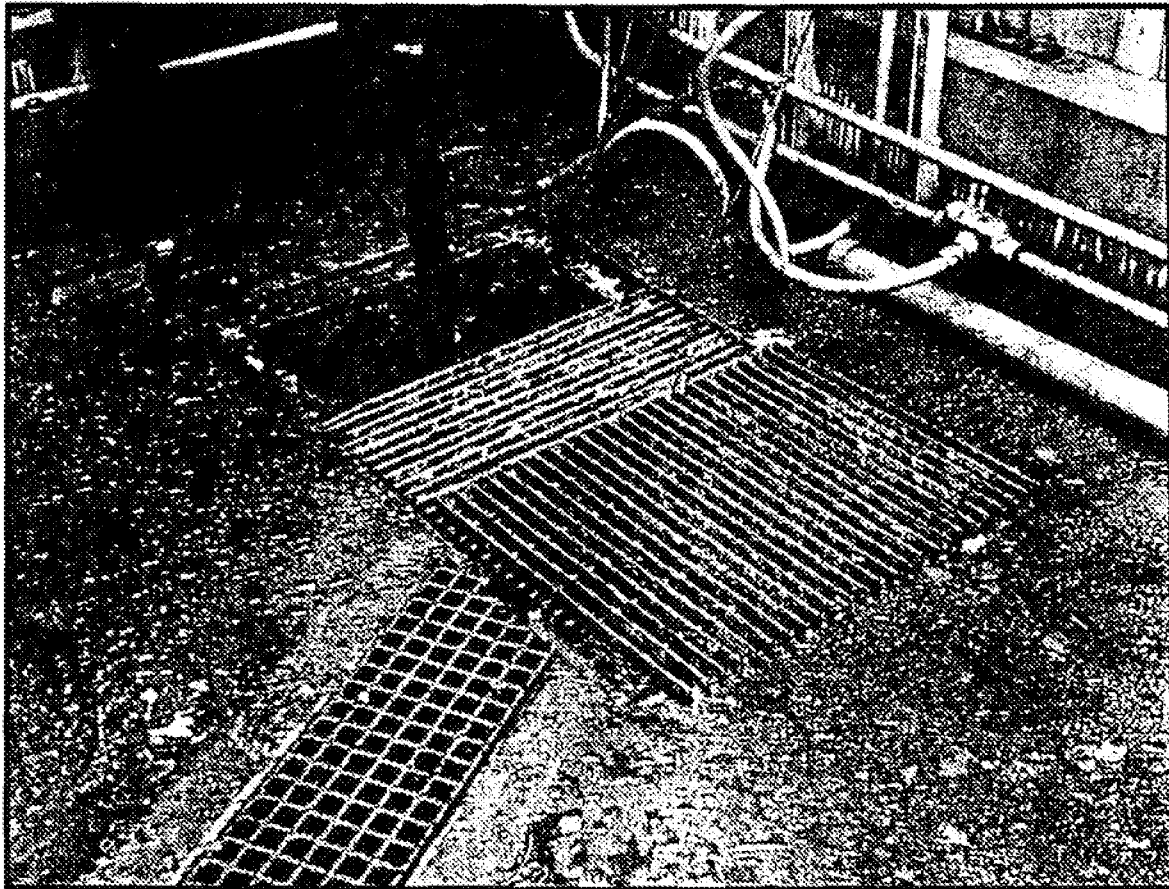


East side of an unused Sebacic Acid Process Area.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH</b>  <b>TECH</b></p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 6</p> <p>Project: 74509</p>
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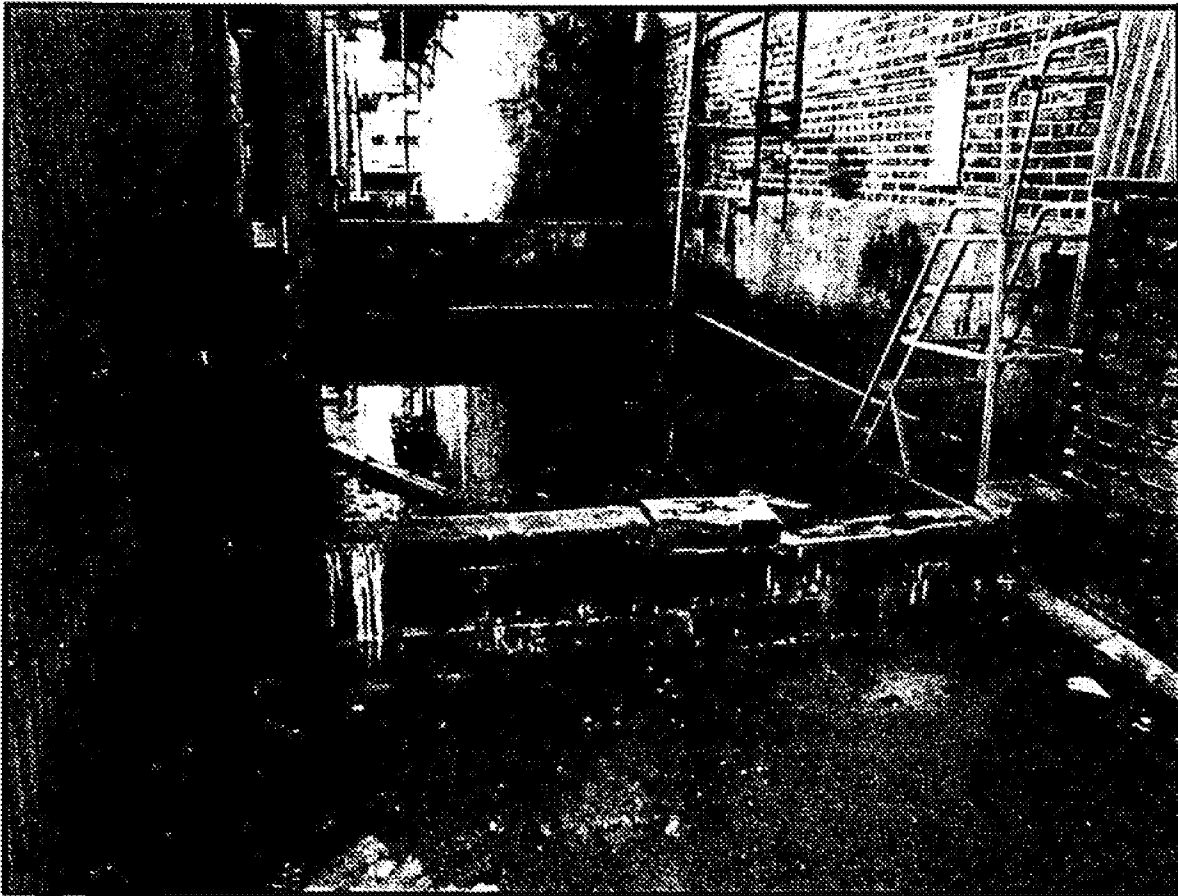


A sump with oily water at the unused Sebacic Acid Process Area.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 7</p> <p>Project: 74509</p>
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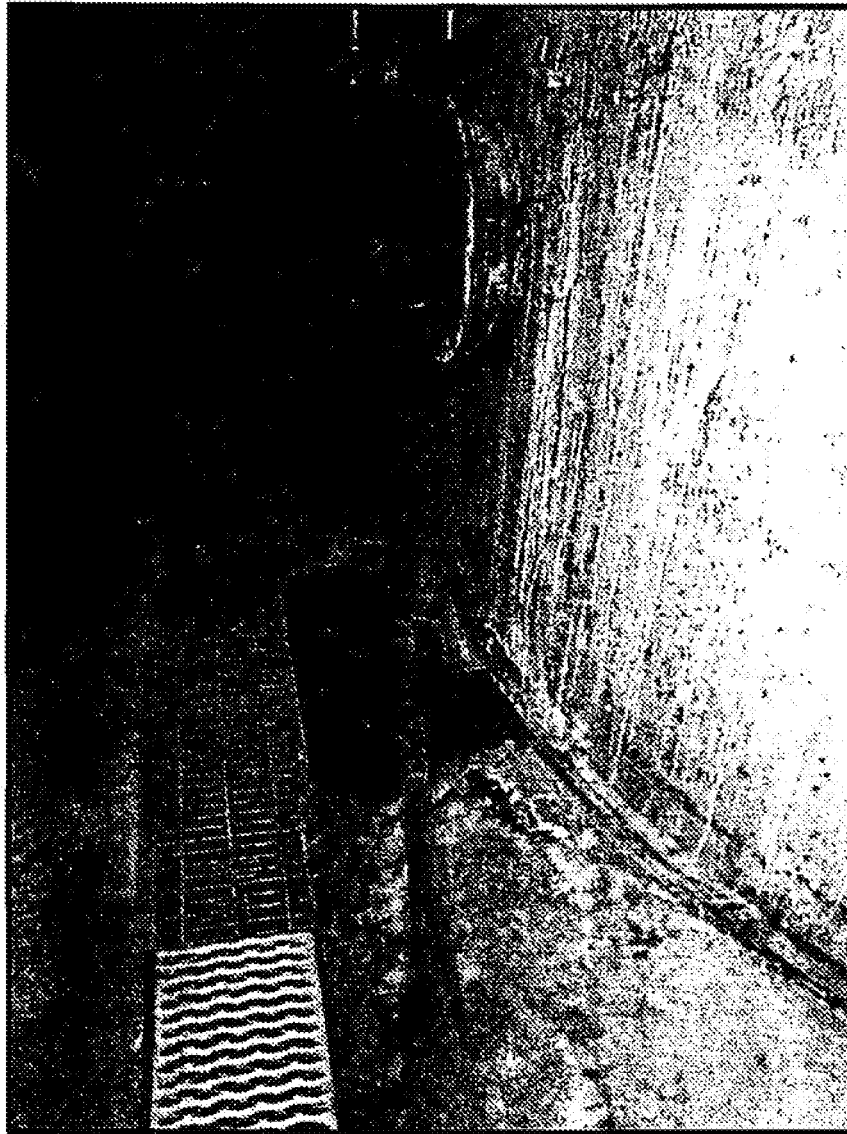


A dike for the former ASTs and a drain valve north of Building 28.  
Note staining on the ground inside the dike.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 8</p> <p>Project: 74509</p>
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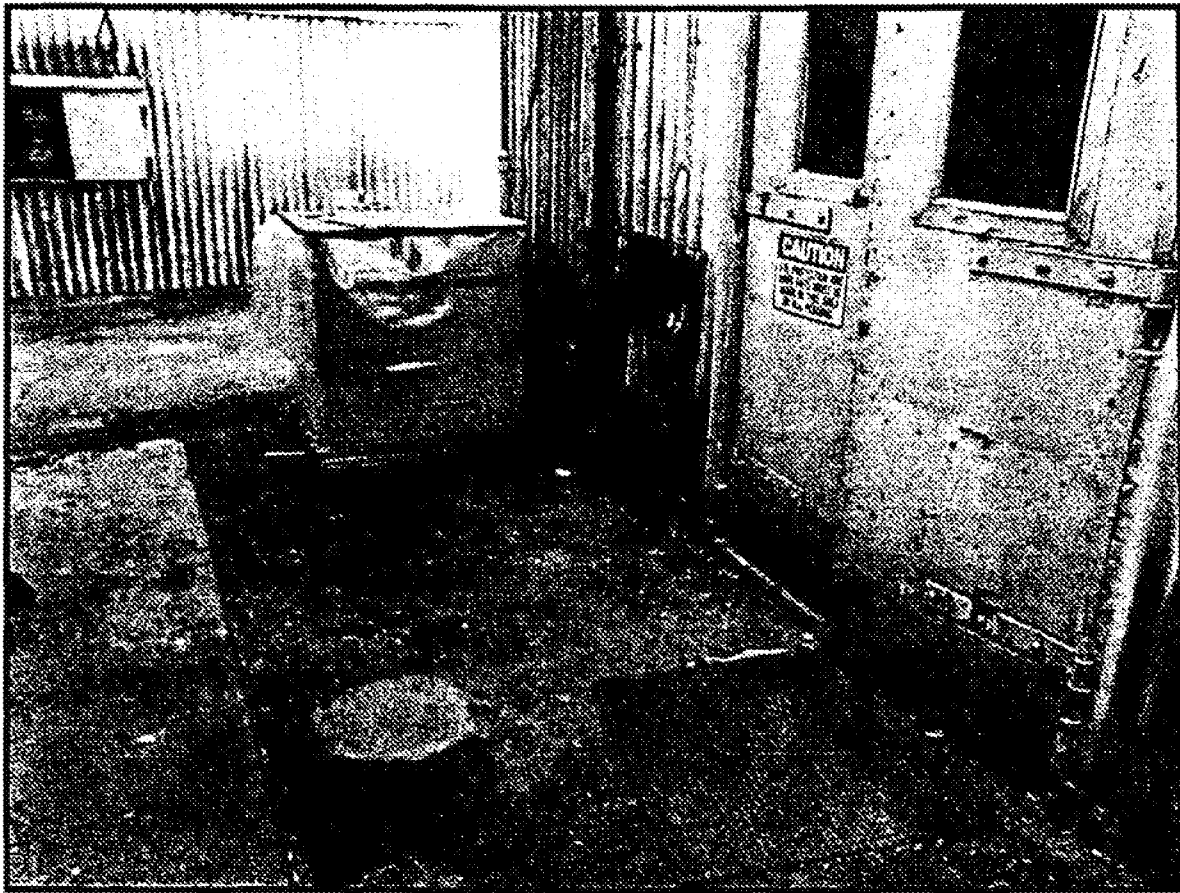


A No. 2 fuel oil tank in the basement of Building #26 and a floor trench running along the tank.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 9</p> <p>Project: 74509</p>
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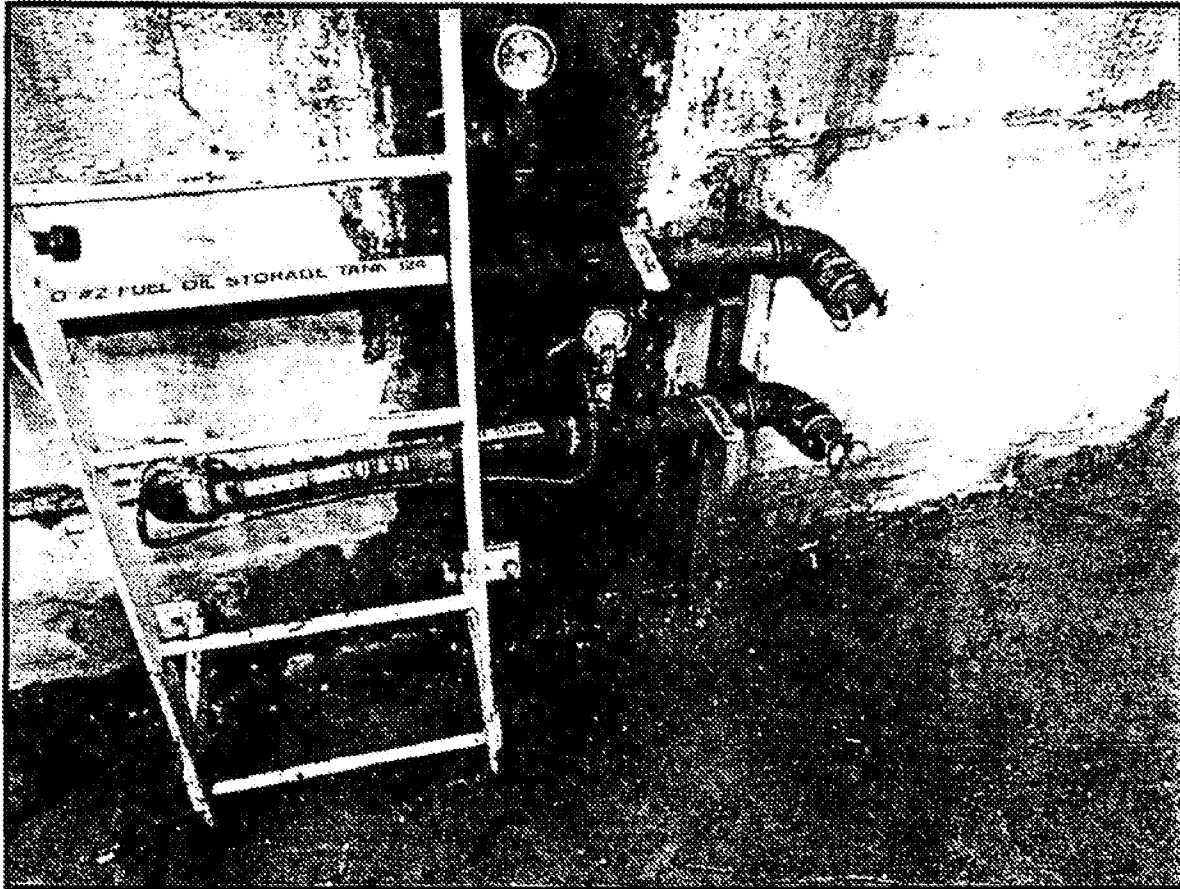
Suspect product fills along the east wall of Building P5.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

<p>EARTH  TECH A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b>  <b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 10 Project: 74509</p>
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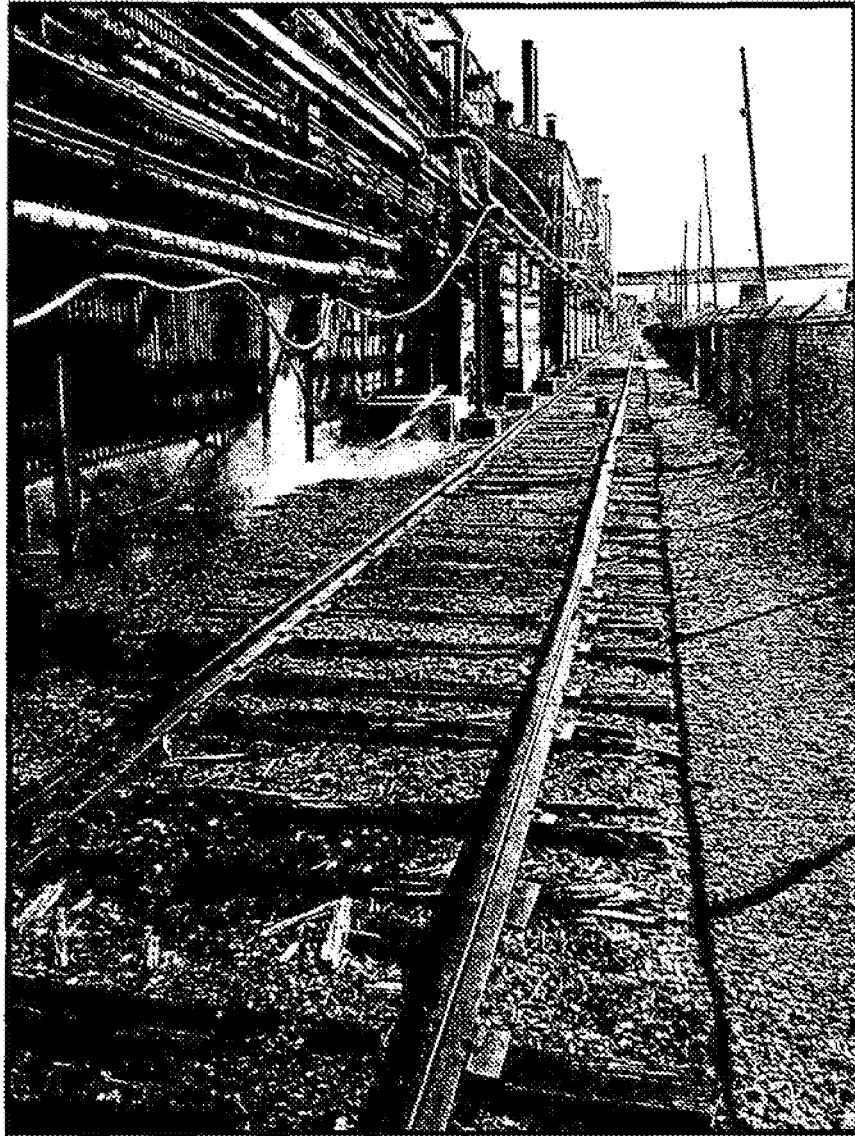


Product fill lines for No. 2 fuel oil at the loading are of Building 26.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 11</p> <p>Project: 74509</p>
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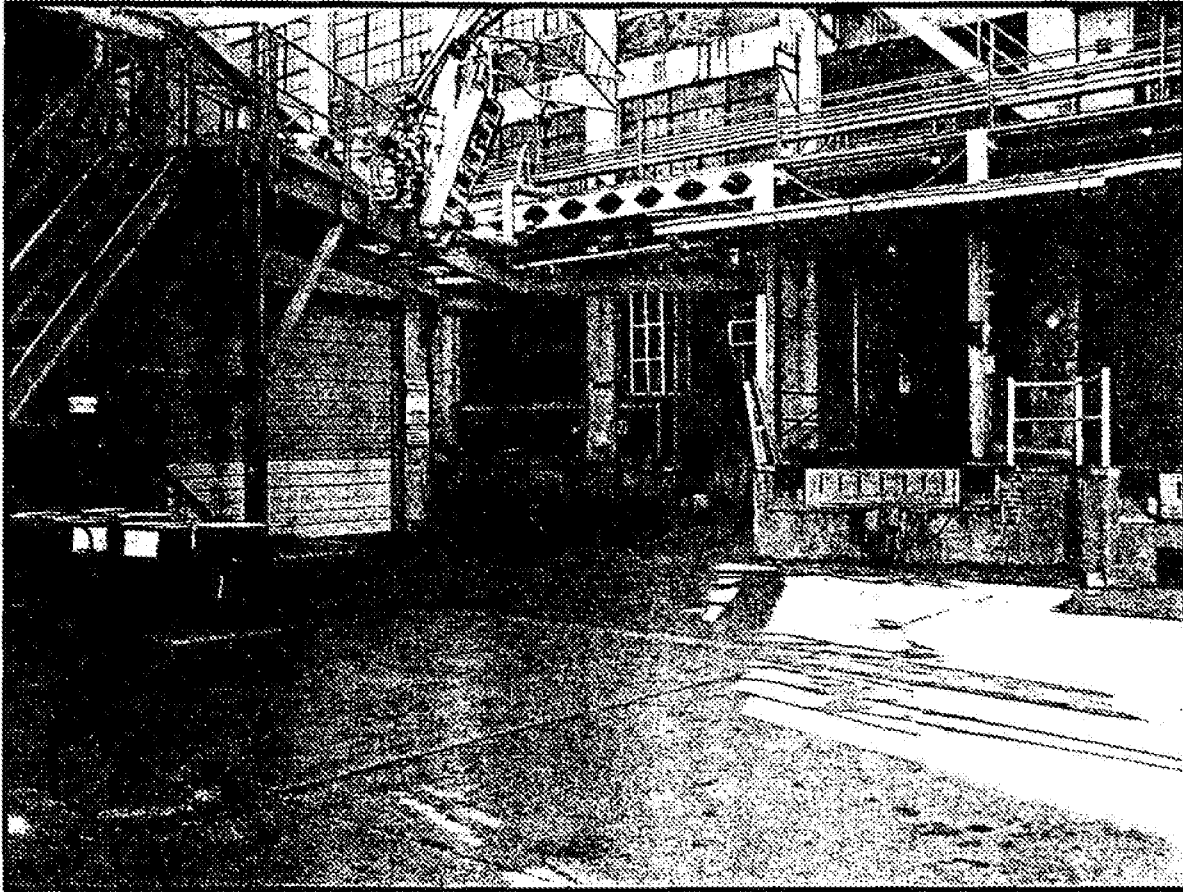


Railroad tracks traversing the southern end of the Bayside Block facing southeast.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH</b>  <b>TECH</b></p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 12</p> <p>Project: 74509</p>
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A central loading and unloading area at Buildings #26 and #9.  
Note hydraulic lifts at corresponding loading docks.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <i>tyco</i> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 13</p> <p>Project: 74509</p>
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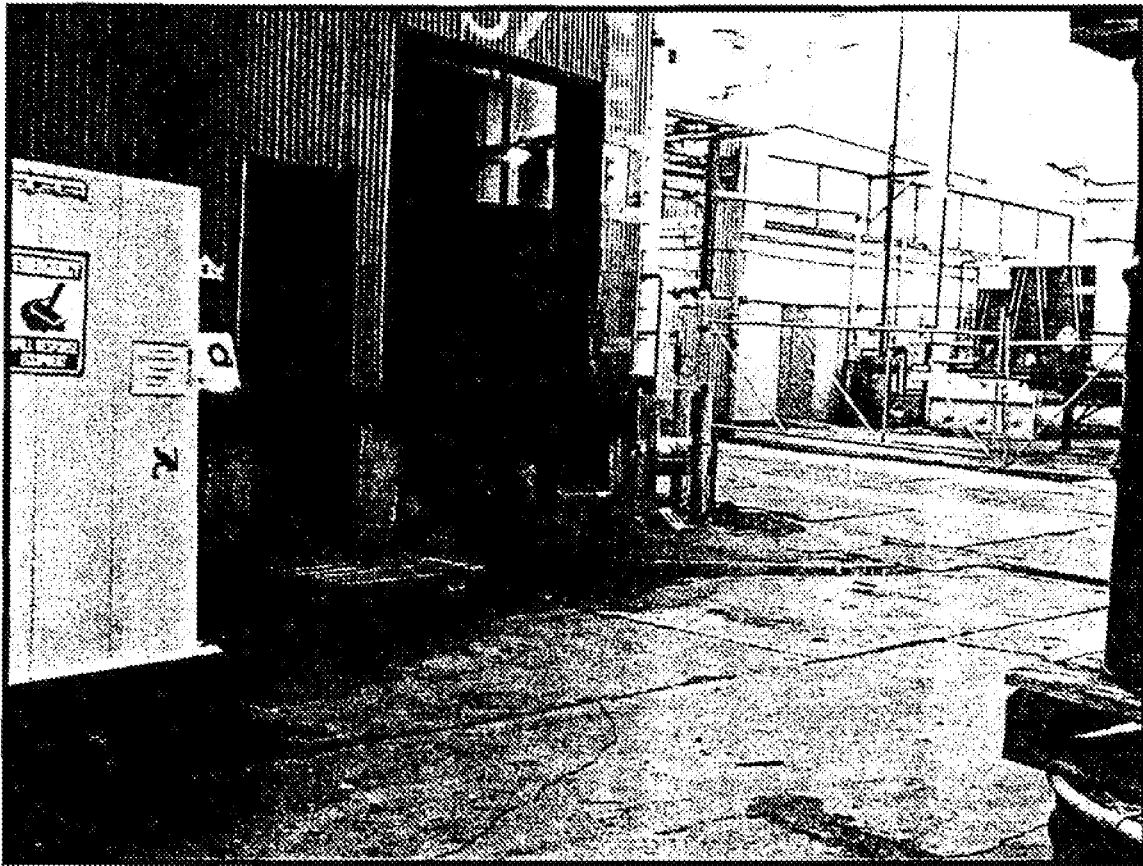


A 20-gallon drum of Phosphoric Acid on concrete pad to the south of the old cooling tower.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH</b>  <b>TECH</b></p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 14</p> <p>Project: 74509</p>
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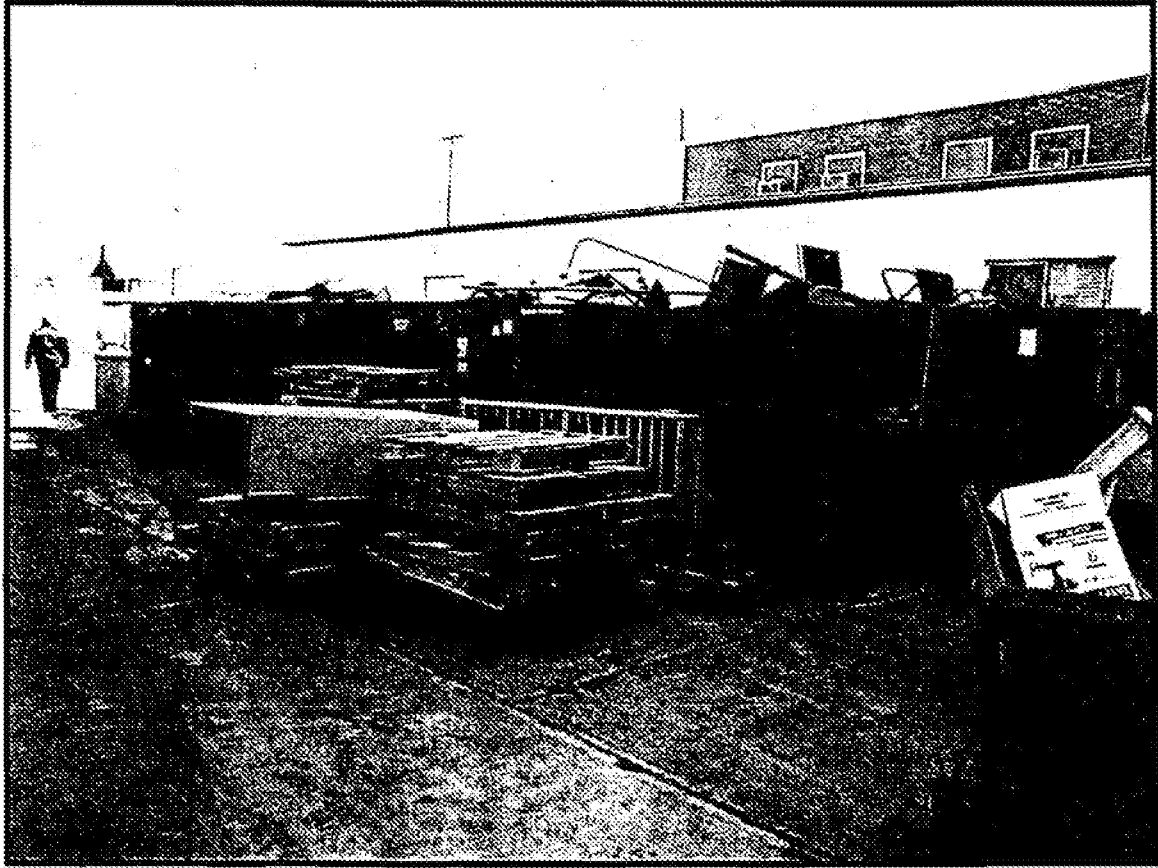


A loading area and a hydraulic lift at the Building 39.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 15</p> <p>Project: 74509</p>
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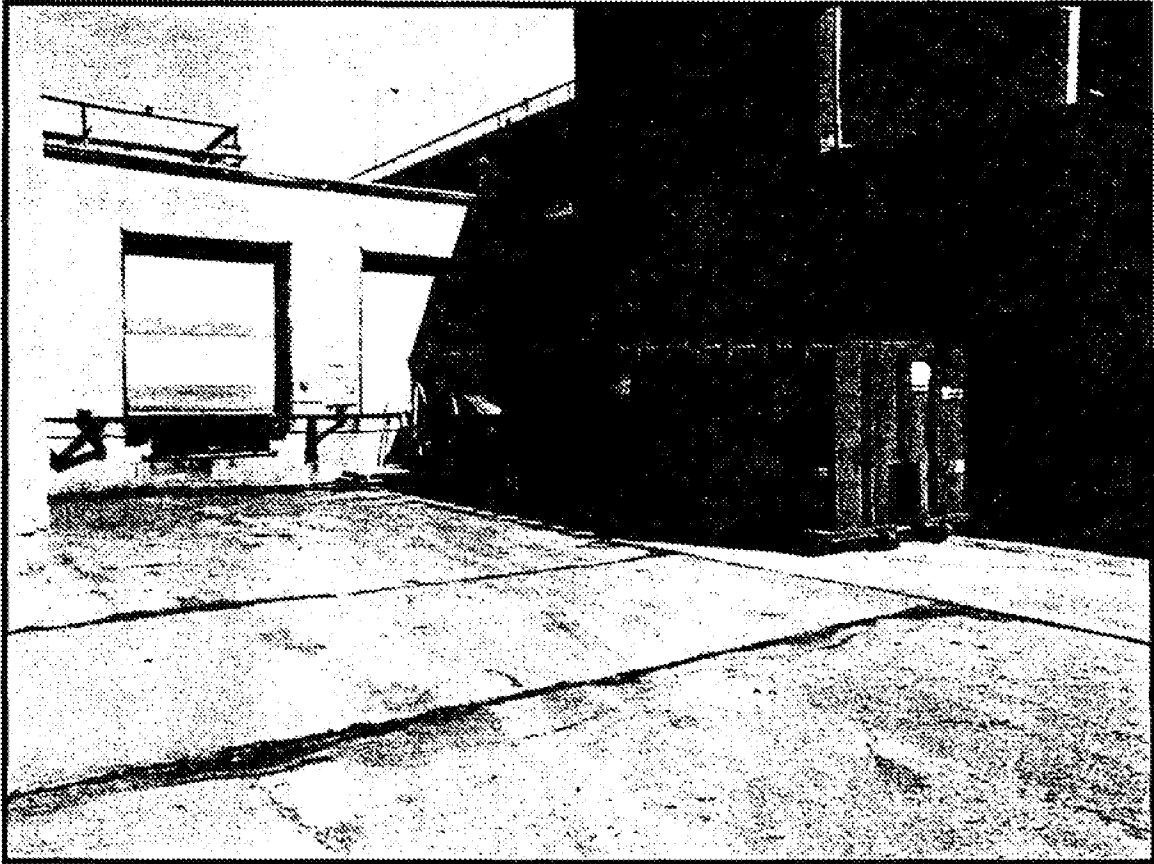


Solid waste roll-off containers in front of the Office Trailer.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 16</p> <p>Project: 74509</p>
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A loading dock with hydraulic trash compactor, roll-of dumpster and two lifts to the west of Building 7A.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 17</p> <p>Project: 74509</p>
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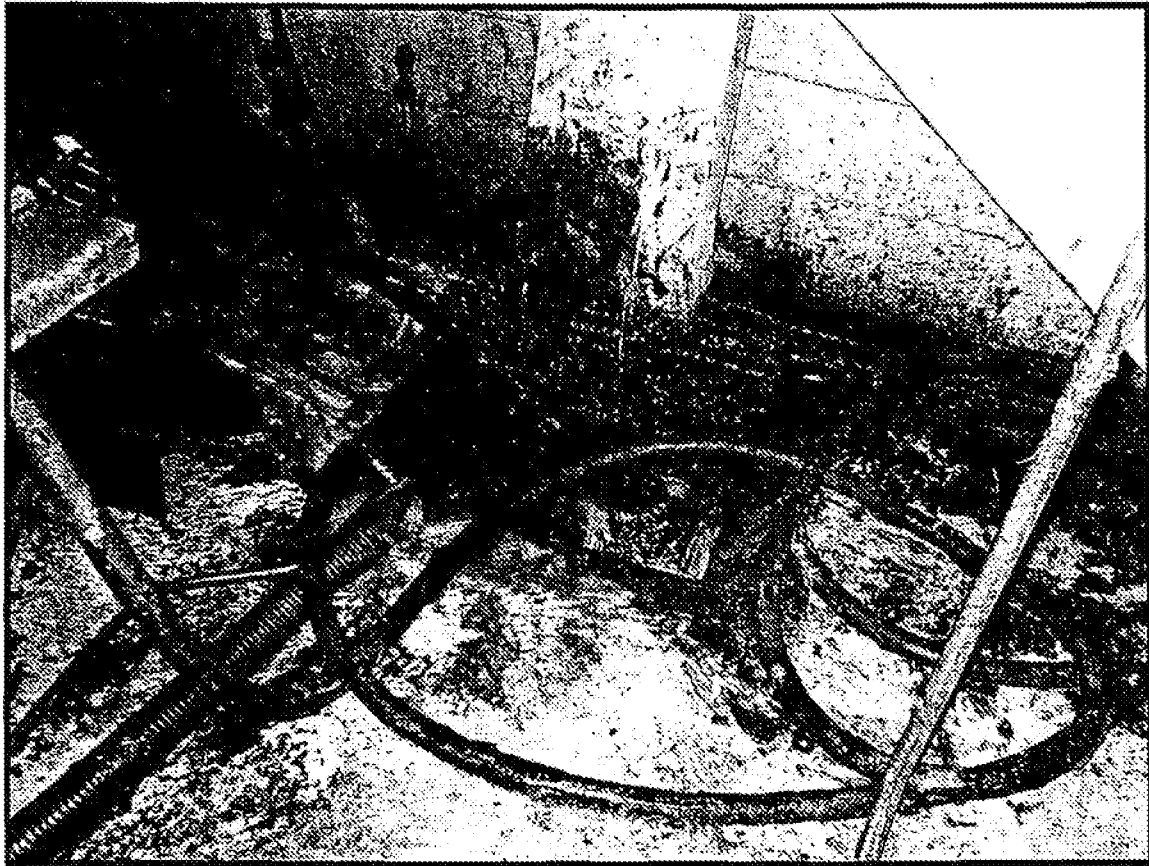
A sump in Building #27.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 18</p> <p>Project: 74509</p>
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A sump in Building #38 (Dowtherm plant).

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 19</p> <p>Project: 74509</p>
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A sump in Building #26.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 20</p> <p>Project: 74509</p>
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A closed floor drain in the Boiler Plant (Building No. 10).

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 21</p> <p>Project: 74509</p>
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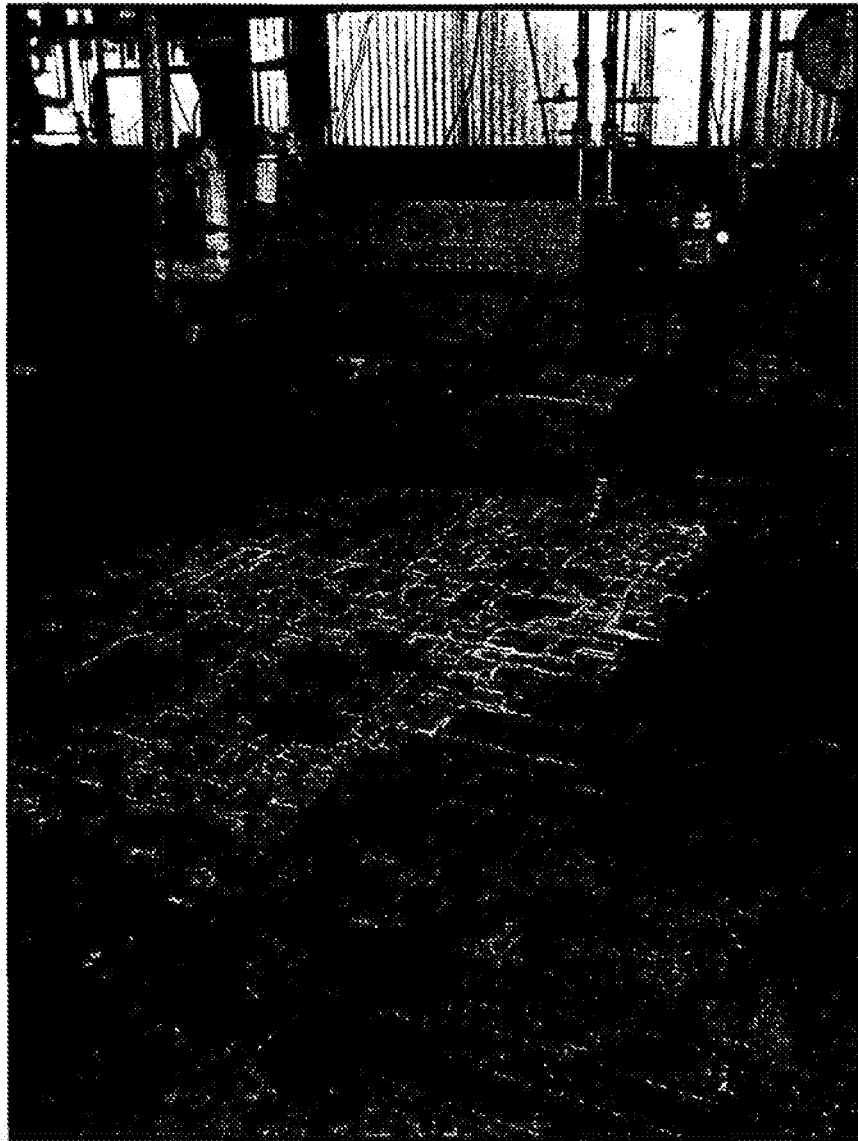


A floor drain in Building #39.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 22</p> <p>Project: 74509</p>
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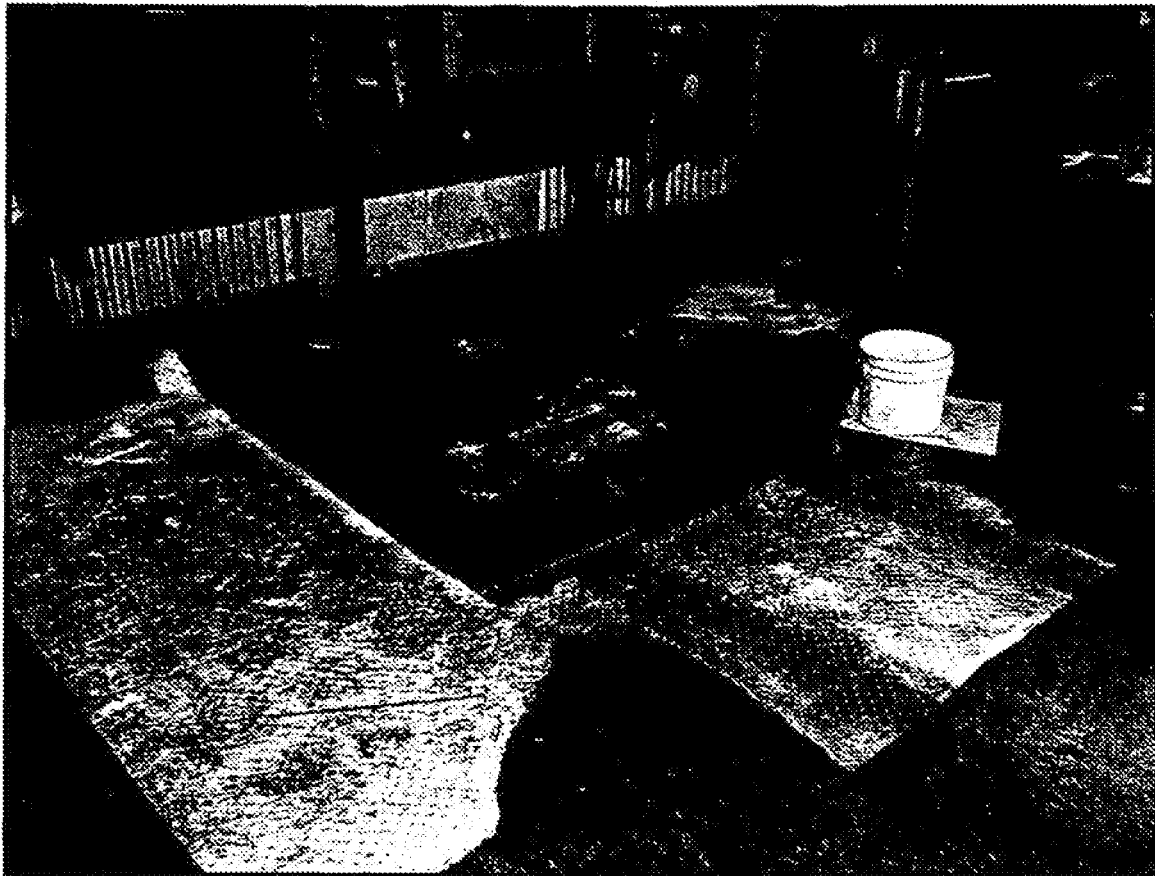


A press and floor trench in Building #28, built as a brick floor.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A tyco INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 23</p> <p>Project: 74509</p>
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An in-ground pit at Building #38.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 24 Project: 74509</p>
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A chemical storage area and floor trench inside Building #28, built as brick floor.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 25 Project: 74509</p>
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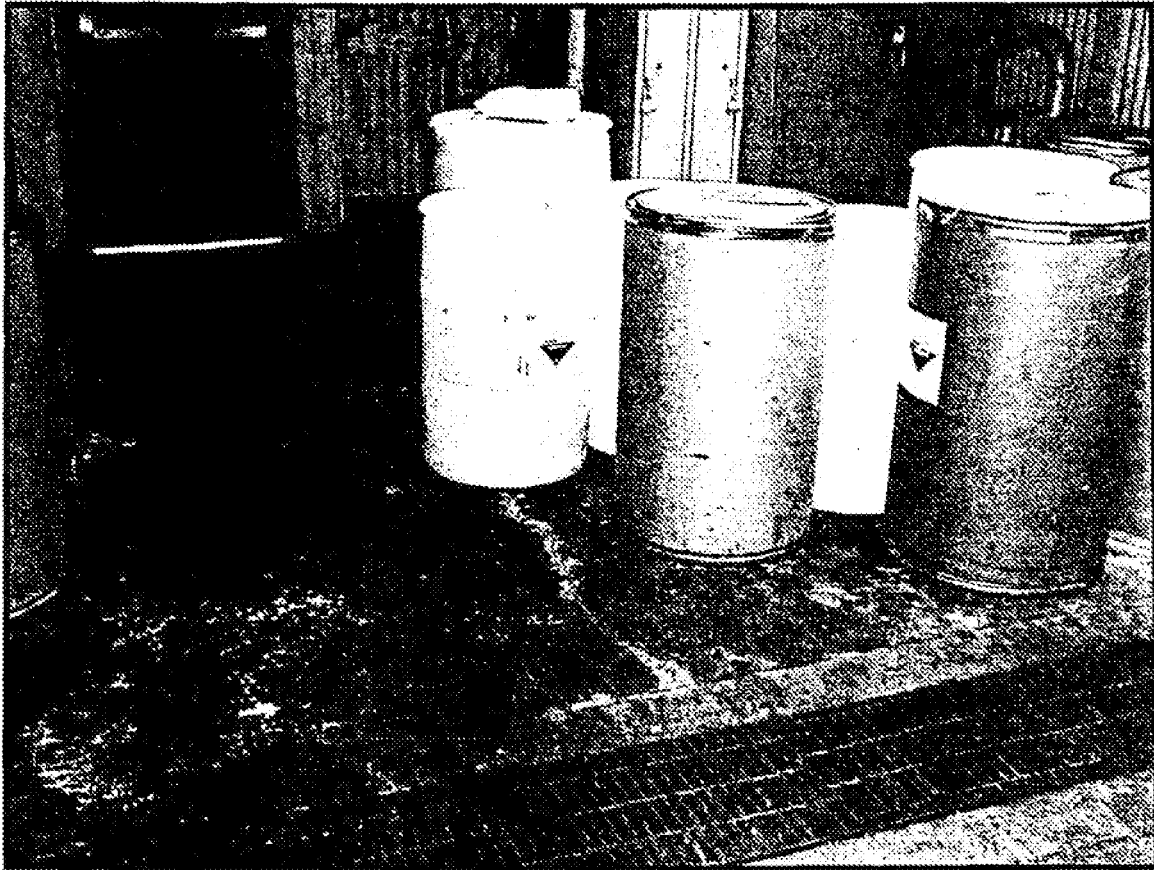
A collection vault for the on-site Wastewater Treatment Plant.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

<p>EARTH  TECH A tyco INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b>  CasChem Inc. 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 26 Project: 74509</p>
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Storage of lubricants and water treatment chemicals near the floor trench of the Building #9.  
Note cracking in the concrete floor at the base of the drums.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 27</p> <p>Project: 74509</p>
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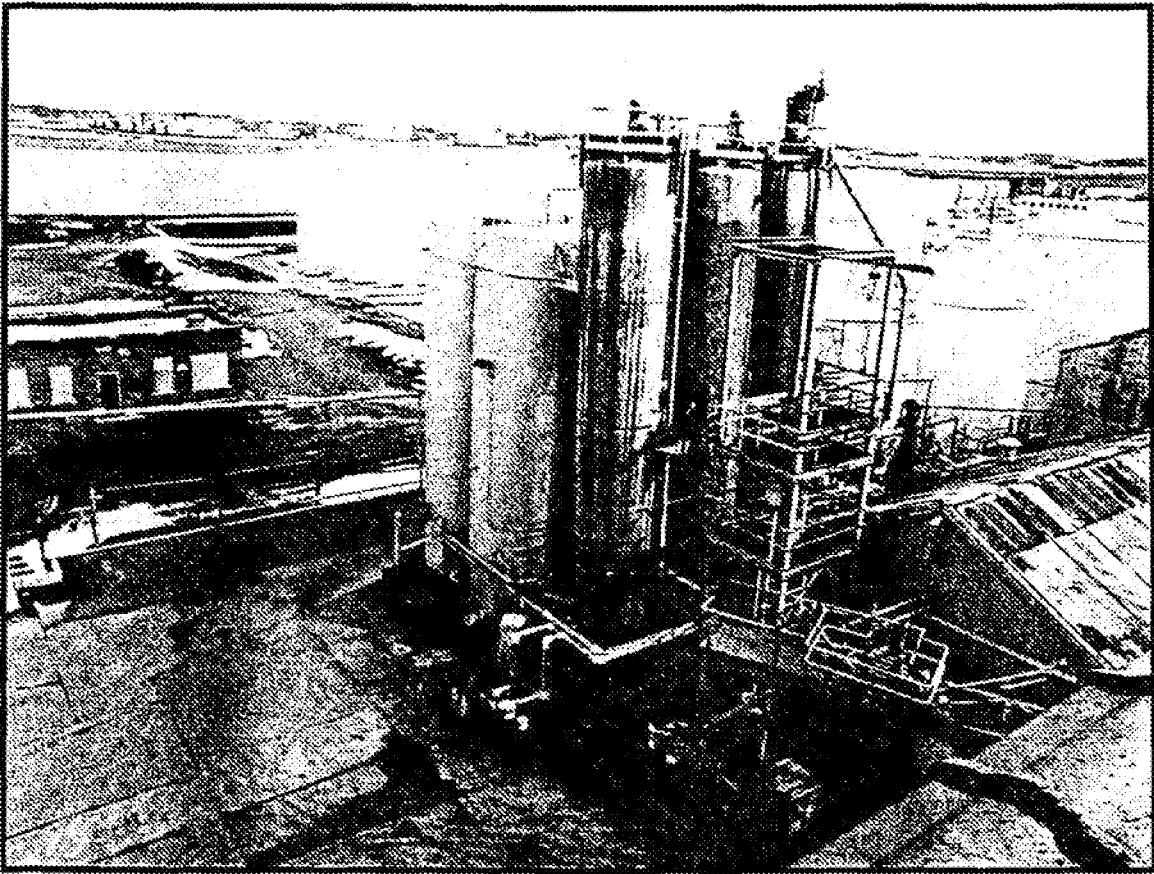


A hot water, steam and condensation discharge to stormwater inlet and an open hole in concrete contiguous to the west side of the Tank E.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A tyco INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 28</p> <p>Project: 74509</p>
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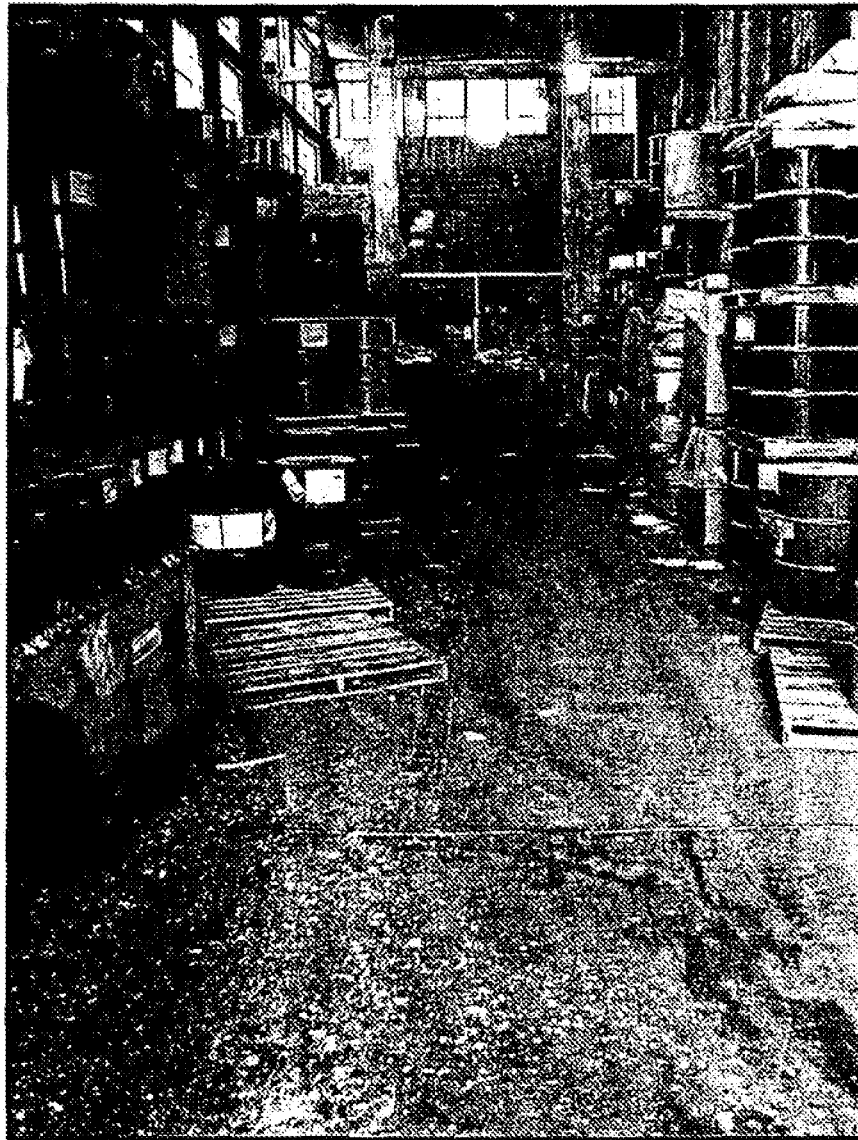


An on-site Wastewater Treatment Plant (WWTP) facing north.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 29</p> <p>Project: 74509</p>
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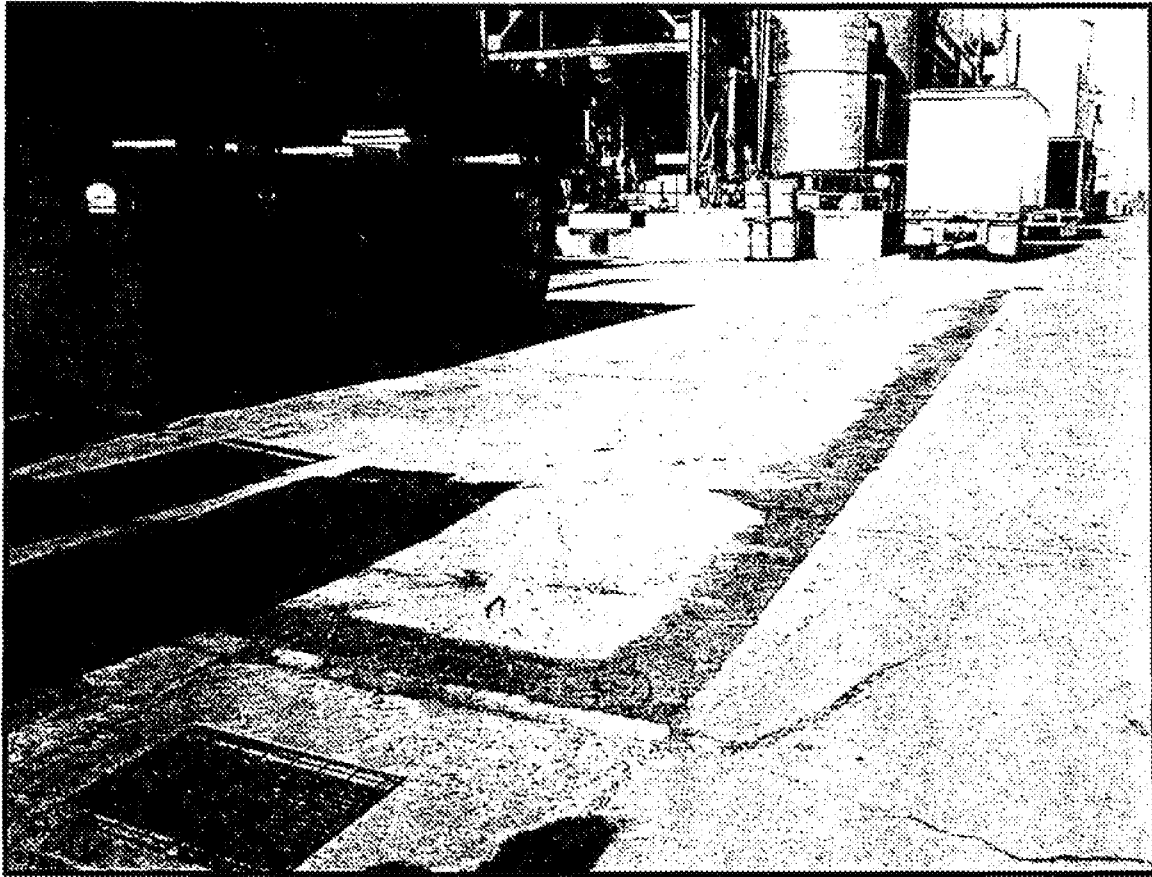


Drum/hazardous waste storage inside Building #3.  
Note a closed floor trench along the centerline of the building.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH</b>  <b>TECH</b></p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 30</p> <p>Project: 74509</p>
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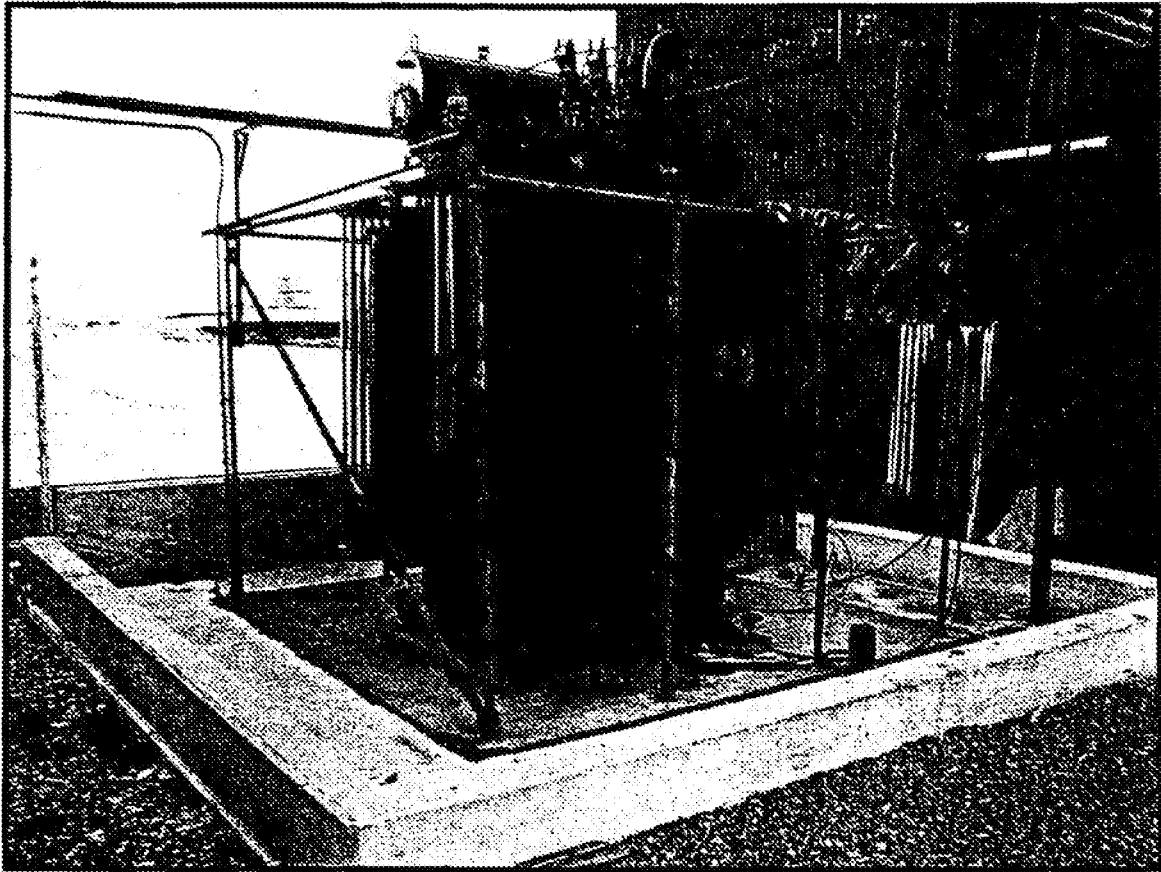


A foundation of former Buildings #1, 2 and 5 at the eastern corner of the Bayside block.  
 Note a stormwater inlet near the former foundation.

Four Neshaminy Interplex, Suite 300  
 Treviso, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:  <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b>          40 Avenue A          Bayonne, NJ 07002</p>	<p>Photograph: 31</p> <p>Project: 74509</p>
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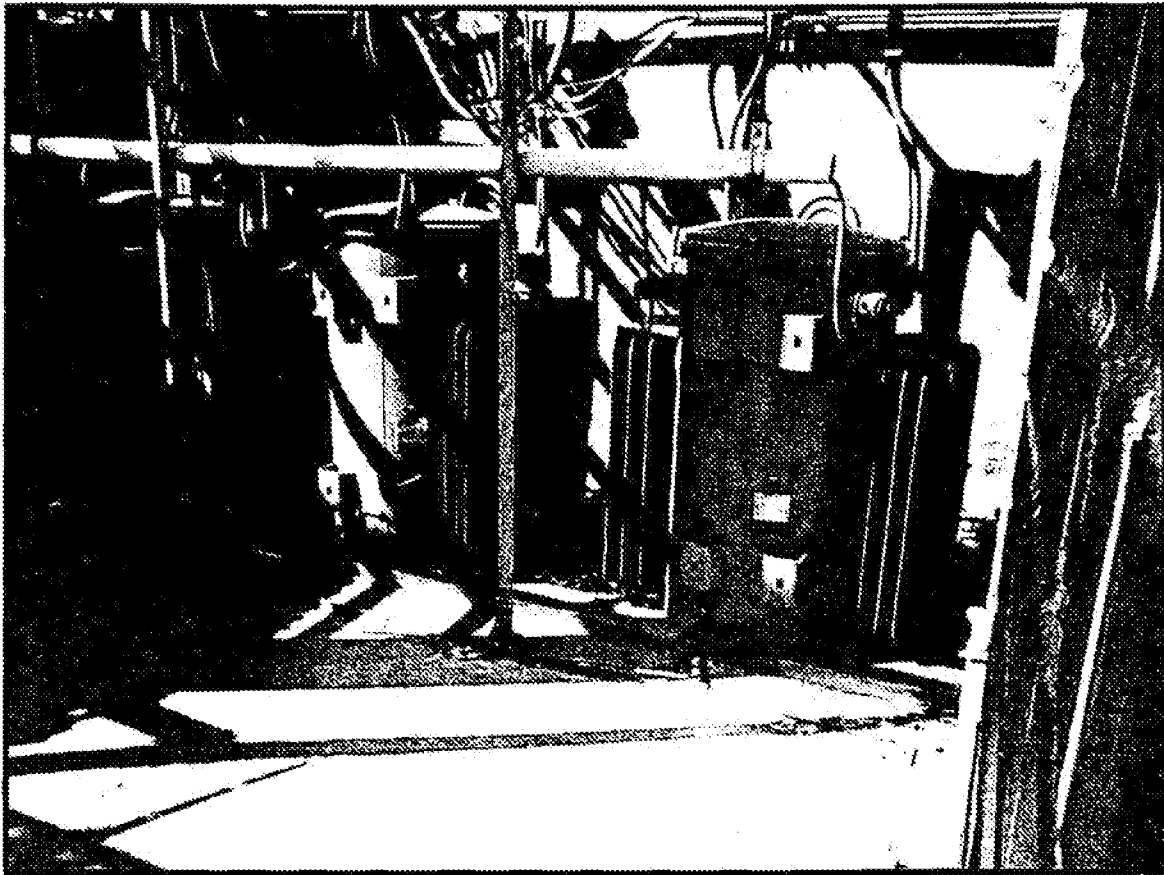
An oil-filled transformer in a dike northwest of Warehouse #32.

LOW PCB  
ON SCENE  
2-50ppm  
PCBs

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A tyco INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 32</p> <p>Project: 74509</p>
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A transformer area at the east end of the Bayside block.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p>EARTH  TECH</p> <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 33</p> <p>Project: 74509</p>
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Oil-filled transformers between buildings #34 and #27.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 34</p> <p>Project: 74509</p>
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An air compressor in Building #26.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

EARTH  TECH

A **tyco** INTERNATIONAL LTD. COMPANY

PROJECT:

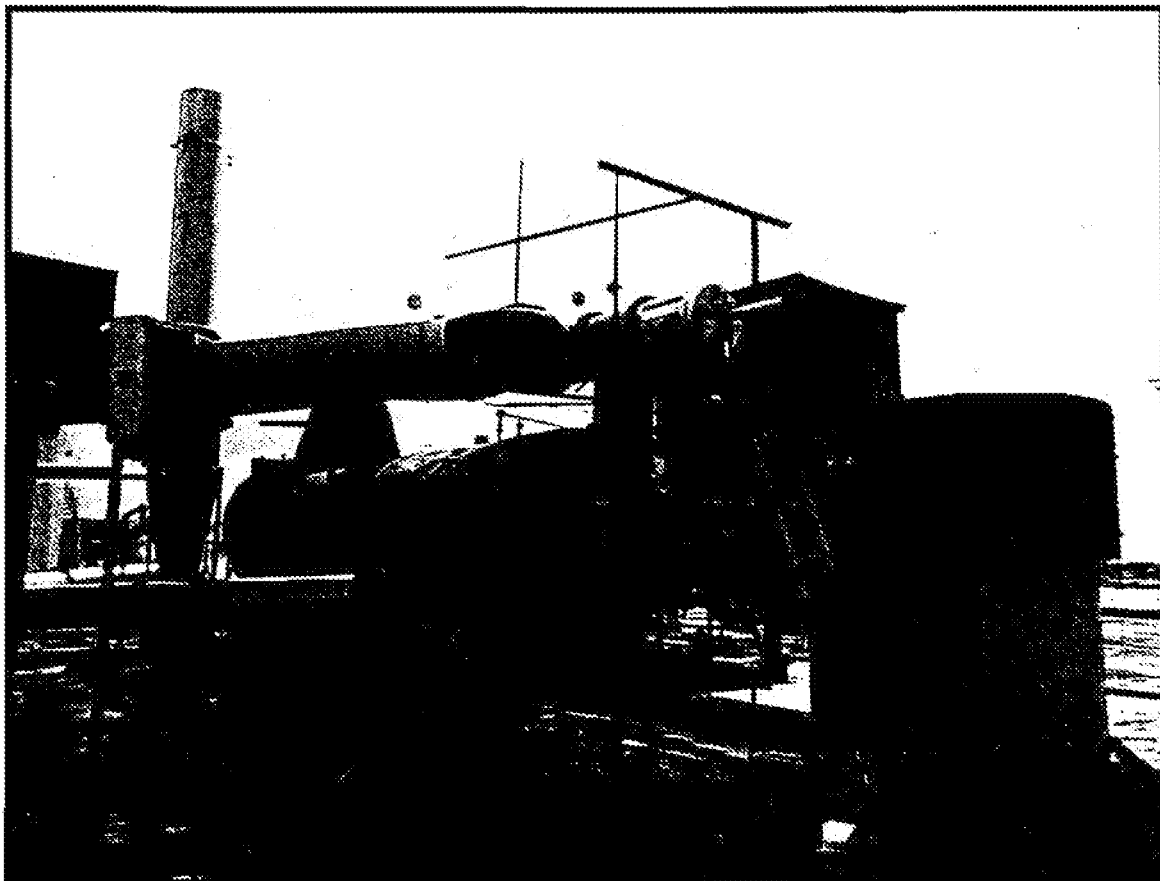
**Preliminary Assessment**

**CasChem Inc.**  
40 Avenue A  
Bayonne, NJ 07002

Photograph: 35

Project: 74509


USE: Environmental Assessment Report - Project 74509 - Building 26 - Incinerator

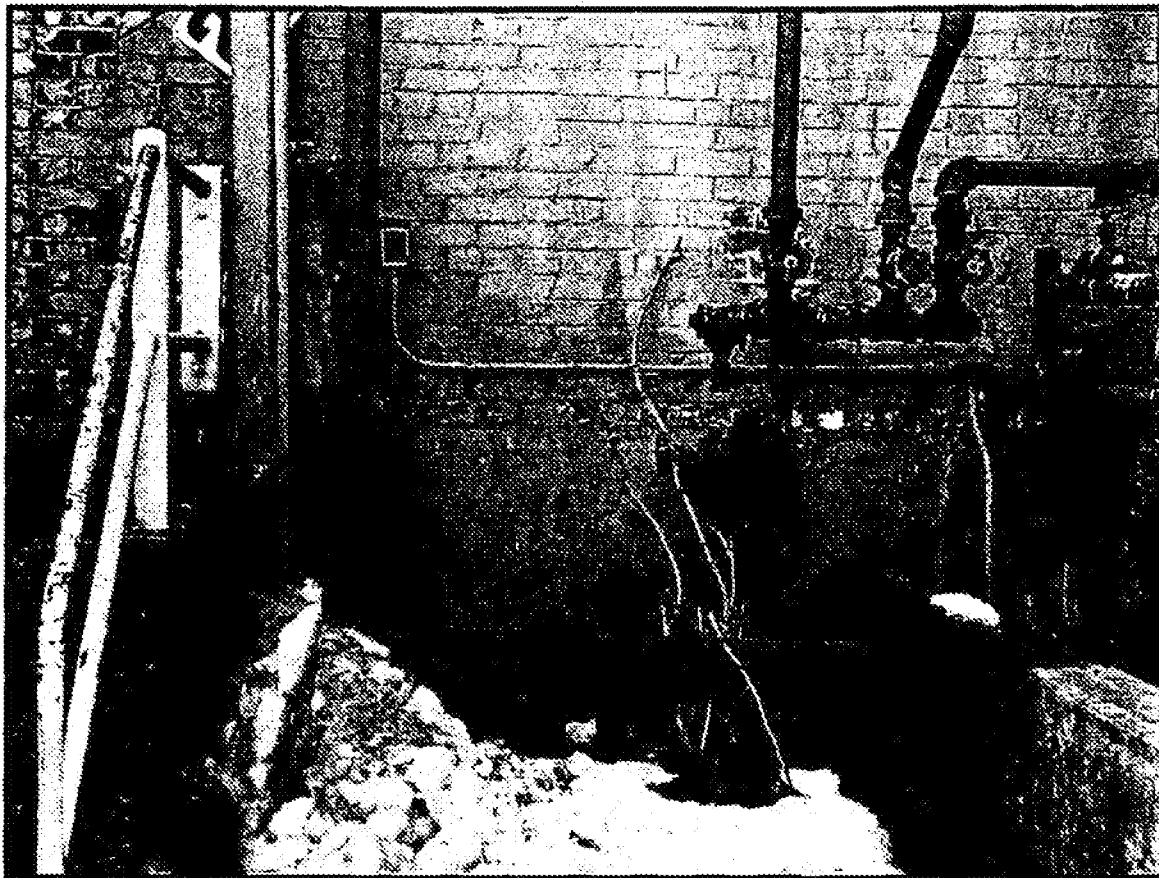


An incinerator on the roof of the Building 26, receiving exhausts from castor oil refinery kettles.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS


<p><b>EARTH TECH</b></p>  <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT:</p> <p><b>Preliminary Assessment</b></p> <p><b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 36</p> <p>Project: 74509</p>
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Metal risers and a vent pipe between Buildings 25 and 34.

Four Neshaminy Interplex, Suite 300  
Trevose, Pennsylvania 19053

ENVIRONMENTAL/CONSULTING ENGINEERS

 <p>A <b>tyco</b> INTERNATIONAL LTD. COMPANY</p>	<p>PROJECT: <b>Preliminary Assessment</b>  <b>CasChem Inc.</b> 40 Avenue A Bayonne, NJ 07002</p>	<p>Photograph: 37  Project: 74509</p>
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44. This Remediation Agreement shall be effective upon the execution of this Remediation Agreement by the NJDEP and CasChem, Inc. The transaction described at Findings, Paragraph 2.A above, maybe consummated upon the execution of this Remediation Agreement. CasChem, Inc. shall return a fully executed Remediation Agreement to the NJDEP together with the signature authorization required above within five business days from the effective date.

**NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION**

Date: 9/19/03

By: Ronald T. Corcory  
Ronald T. Corcory, Assistant Director  
Oversight Resources Allocation Element

**CASCHEM, INC.**

Date: 11/10/03

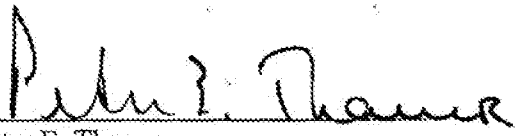
By: Salvatore J. Guccio  
Salvatore J. Guccio  
Print Full Name Signed Above  
VICEPRESIDENT  
Title

CERTIFICATE

I, PETER E. THAUER, do hereby certify that I am the duly elected, and qualified Secretary of CASCHEM, INC., a Delaware corporation (the "Company"), and that as such, have the custody of the corporate records and seal of said Company; that attached hereto as Exhibit A is a true and correct copy of certain resolutions duly adopted by the Board of Directors on October 16, 2003, as it appears in the minute book of said Company and that said resolutions remain in full force and effect as of the date hereof and have not been amended, repealed, rescinded or changed in any way whatsoever.

IN WITNESS WHEREOF, the undersigned has hereunto set his hand and affixed the corporate seal of said Company, this 10<sup>th</sup> day of November 2003.

(SEAL)

  
\_\_\_\_\_  
Peter E. Thauer  
Secretary

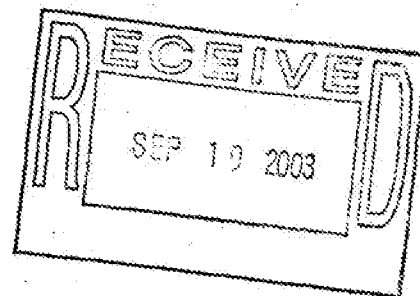
**RESOLVED**, that Salvatore J. Guccione, Vice President of the Company, is hereby authorized, empowered and directed to execute, ratify and deliver the Remediation Agreement ("Agreement") by and between the Company and the New Jersey Department of Environmental Protection pursuant to the New Jersey Industrial Site Recovery Act, N.J.S.A. 13:1K-6 et seq. and any and all documents, agreements and instruments incident thereto or in connection therewith; and be it further

**RESOLVED**, that the Company and Salvatore J. Guccione, Vice President of the Company, shall take any and all other actions to effect the terms set forth in the Agreement and all such other documents, agreements and instruments related or incident thereto; and be it further

CasChem, Inc.  
40 Avenue A  
Beyonne, NJ 07002  
Tel. # (201) 858-7900  
Fax # (201) 437-2728

Via federal express  
September 15, 2003


New Jersey Department of Environmental Protection  
Division of Remediation Support  
Oversight Resources Allocation Element  
Office of Accountability  
401 East State Street, 5<sup>th</sup> Floor West  
P.O. Box 028  
Trenton, NJ 08625



Re: CasChem, Inc.  
Remediation Agreement Application  
Case # E20030351

Enclosed please find the Remediation Agreement Application for the above referenced Site. If you have any questions or comments, please contact Mr. Douglas I. Eilender, Esq., Cole, Schotz, Meisel, Forman & Leonard at 201-525-6205.

Sincerely,

  
Mary E. Fletcher  
Counsel  
CasChem, Inc.

cc: Bill Goodman, NJDEP Case Manager  
Mr. Douglas I. Eilender, Esq., Cole, Schotz, Meisel, Forman & Leonard, PA  
Edward Hogan, Esq., Norris, McLaughlin & Marcus, P.A.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF REMEDIATION SUPPORT  
OVERSIGHT RESOURCES ALLOCATION ELEMENT  
401 EAST STATE STREET, 5<sup>TH</sup> FLOOR  
P.O. BOX 028  
TRENTON, NJ 08625-0028

REMEDICATION AGREEMENT APPLICATION

PLEASE TYPE OR PRINT

Date September 12, 2003

1. **Industrial Establishment(s)**  
(Attach additional sheets if there is more than one to be included in this Remediation Agreement.)

Name CasChem, Inc.

Telephone# (201) 858-7900

Street Address 40 Avenue A

City or Town Bayonne State NI Zip Code 07002

Municipality Bayonne City County Hudson

Tax Block Number(s) 360, 361, 362 Tax Lot Number(s) 1, 12, 3

State of Incorporation, if applicable: Delaware

Standard Industrial Classification (SIC) Number: 2869

2. **Has a General Information Notice (GIN) been filed for this transaction?**

If yes, ISRA Case number # Yes -- case # E20030351

If no, attach a completed GIN to this application.

3. **Current Property Owner(s)** (Attach additional sheets if more than one.)

Name CasChem, Inc. Telephone # (201) 858-7900

Firm \_\_\_\_\_

Street Address 40 Avenue A

Municipality Bayonne State NI Zip Code 07002

State of Incorporation, if applicable: Delaware



Property Owner(s) type of Business Association and General Partner(s), if applicable:

Corporation

4. **Prior Owner/Operator at site since December 31, 1983 (Attach additional sheets if necessary.)**

Name (Identify as Operator or Owner)

Dates of Ownership/Operation

CasChem, Inc.

Prior to 12/31/83 to Present

5. **Party(ies) Agreeing to be responsible under the Remediation Agreement (Attach additional sheets if more than one.)**

Name CasChem, Inc. Telephone # (201) 858-7900

Firm \_\_\_\_\_

Street Address 40 Avenue A

Municipality Bayonne

State NJ

Zip Code 07002

State of Incorporation, if applicable:

Delaware

Type of Partnership and General Partner(s), if applicable:

N/A

Designate lead party responsible for Remediation Agreement where multiple parties

are proposed: \_\_\_\_\_

6. **Describe IN DETAIL the ISRA subject transaction for which this Remediation Agreement is requested. Please include the status of the operations (continuing or ceasing) and the identity of the property owner and operator upon completion of the transaction. (Attach additional sheets, if necessary.)**

The transaction involves the sale of the business, the assets and the real property. The current operations will continue by the new owner, Rutherford Chemicals, LLC.

3. I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, To the best of my knowledge the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-13.

Typed/Printed Name Peter E. Thauer Title Vice President, CasChem

Signature *Peter E. Thauer* Date 9/12/03

Sworn to and Subscribed Before Me on this 12<sup>th</sup> Date of September 2003

Notary *Mary E. Fletcher Attorney At Law - State of New Jersey*

**B. Transferee or New Lessee Certification:**

I hereby certify that [Person] is the transferee and/or new lessee of the industrial establishment subject to this remediation agreement. I have read this application and am aware of the requirements and conditions of ISRA and the remediation agreement. [Person] expressly agrees to allow the Department, seller, previous owner, previous operator, any other person subject to the remediation agreement, and any of their respective agents or assignees the right to enter the industrial establishment after the ISRA-subject transaction has taken place and/or the lease has been executed for completion of the remediation of the industrial establishment. Additionally, I acknowledge and understand that if a remedial action is warranted at the subject industrial establishment, institutional controls and engineering controls as defined in ISRA, N.J.S.A. 58:10B-1 et seq., N.J.A.C. 7:26C, N.J.A.C. 7:26E and N.J.A.C. 7:26B may be necessary at the industrial establishment.

Typed/Printed Name \_\_\_\_\_ Title \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

Sworn to and Subscribed Before Me on this \_\_\_\_\_

Date of \_\_\_\_\_ 20 \_\_\_\_\_

Notary \_\_\_\_\_

ISRA-012  
8/03

3. I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, To the best of my knowledge the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-13.

Typed/Printed Name \_\_\_\_\_ Title \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

Sworn to and Subscribed Before Me on this \_\_\_\_\_ Date of \_\_\_\_\_ 20 \_\_\_\_\_

Notary \_\_\_\_\_

**B. Transferee or New Lessee Certification:**

I hereby certify that [Person] is the transferee and/or new lessee of the industrial establishment subject to this remediation agreement. I have read this application and am aware of the requirements and conditions of ISRA and the remediation agreement. [Person] expressly agrees to allow the Department, seller, previous owner, previous operator, any other person subject to the remediation agreement, and any of their respective agents or assignees the right to enter the industrial establishment after the ISRA-subject transaction has taken place and/or the lease has been executed for completion of the remediation of the industrial establishment. Additionally, I acknowledge and understand that if a remedial action is warranted at the subject industrial establishment, institutional controls and engineering controls as defined in ISRA, N.J.S.A. 58:10B-1 et seq., N.J.A.C. 7:26C, N.J.A.C. 7:26E and N.J.A.C. 7:26B may be necessary at the industrial establishment.

Typed/Printed Name Salvatore Gagliardo Title Vice President, Rutherford Chemicals

Signature *Salvatore A. Gagliardo* Date 9/15/03

Sworn to and Subscribed Before Me on this \_\_\_\_\_

Date of \_\_\_\_\_ 20 \_\_\_\_\_

Notary \_\_\_\_\_

35316/0008-130589102

Division of Remediation Support  
 Oversight Resources Allocation Element  
 Office of Accountability  
 401 East State Street  
 5th Floor West  
 P.O. Box 028  
 Trenton, NJ 08625  
FAX (609) 633-1439

**SELF-GUARANTEE APPLICATION**

*This application is prepared in conjunction with N.J.A.C. 7:26C-7.7.*

**Please send the completed form to:**

Division of Remediation Support  
 Oversight Resources Allocation Element  
 Office of Accountability  
 401 East State Street, 5<sup>th</sup> Floor W  
 P.O. Box 028  
 Trenton, NJ 08625-0028

Attn: Remediation Funding Source Coordinator

**An application for Self-Guarantee should include the following information:**

**1. Site information:**

NJDEP Program Interest #/Case Number: ISRA # E20030351

Contaminated Site List Number: N/A

NJDEP Program Site Name: CasChem, Inc.

Site location: 40 Avenue A, Bayonne, NJ 07002

Oversight Document Type and Dated executed: General Information Notice and  
Remediation Agreement

**2. Self-Guarantee Applicant's Information:**

Company: CasChem, Inc.

Contact Person: Mr. Seth Levine

Address: Technology Center of New Jersey, 661 Highway One, North Brunswick, NJ  
08902.







Telephone number: (732) 447-1913

Fax number: \_\_\_\_\_

E-mail address: \_\_\_\_\_

3. Amount of Remediation Funding Source to be posted

\$ \$100,000

4. a. Estimated remaining cost of remediation

\$ Unknown

b. Estimated cost of remediation for the following 12-month period

\$ Unknown

5. The following Financial Documentation from the most current Fiscal Year End MUST be attached:

- An audited financial statement prepared in accordance with the American Institute for Certified Public Accountants guidelines, including but not limited to income statement, balance sheet and consolidated statement of cash flow.

6. PLEASE FILL IN ITEMS 6A-6D BELOW. THE INFORMATION PROVIDED SHOULD COME FROM THE FINANCIAL DOCUMENTATION PROVIDED IN ITEM #5. NEXT TO EACH VALUE, PLEASE INDICATE THE PAGE ON WHICH THE INFORMATION CAN BE FOUND.

See Cambrex Corporation Annual Report on Form 10-K for year-end December 31, 2003, pages 31-34 (attached). Cambrex Corporation is CasChem's parent corporation.

The following statements are to be made from the chief financial officer or similar officer of Cambrex Corporation (Guarantor) and that the information provided in the written statements is true to the best of the officer's information, knowledge and belief and meets the requirements of N.J.S.A. 58:10B-3(f):

- a. Does the estimated cost of remediation exceed one-third of guarantor's net worth?  
\_\_\_\_\_ YES X NO

Guarantor's Net Worth (pg. 31)	<u>\$412,682,000</u>
One-third of above	<u>\$137,561,000</u>
Estimated cost of remediation	\$ <u>100,000 (default amount)</u>

- b. Is cash flow sufficient to assure the availability of sufficient monies for the remediation?  
X YES \_\_\_\_\_ NO

Guarantor's Net Cash provided by  
operating activities (pg 34) \$104,340,000  
Estimated cost of remediation \$ 100,000 (default amount)

c. Do the gross receipts (revenues) exceed gross payments (expenses) for the preceding  
fiscal year?  X  YES   NO

Gross Receipts (revenues) (pg.32) \$522,176,000  
Gross Payments (cost and expenses  
excluding interest and tax) (pg.32) \$485,943,000  
Net Income \$ 36,233,000

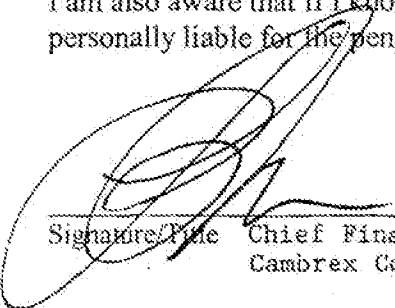
d. Are the gross receipts greater than the estimated costs for completing the remediation?  
 X  YES   NO

Gross Receipts (revenues) (pg. 32) \$522,176,000  
Estimated cost of remediation \$ 100,000 (default amount)

The aforementioned statement should be certified and notarized in accordance with  
N.J.A.C. 7:26C-1.2(a)2.

### CERTIFICATIONS

"I certify under penalty of law that I am fully aware of the requirements of  
N.J.S.A. 58:10B-3 as they pertain to remediation funding sources. Specifically, I am  
aware of the responsibilities to establish and maintain the remediation funding source.  
Additionally, I acknowledge that the remediation funding source as required by N.J.A.C.  
7:26C-7 shall be maintained until such time as an alternative remediation funding source  
is submitted to the Department and it has been approved by the Department in writing or  
the Department determines that it is no longer necessary to maintain a remediation  
funding source. I am aware that there are significant civil penalties for knowingly  
submitting false, inaccurate or incomplete information and that I am committing a crime  
of the fourth degree if I make a written false statement, which I do not believe to be true.  
I am also aware that if I knowingly direct or authorize the violation of any statute, I am  
personally liable for the penalties."

  
\_\_\_\_\_  
Signature/Title Chief Financial Officer  
Cambrex Corporation

9/12/03

\_\_\_\_\_  
Date





THE BACK OF THIS DOCUMENT HAS AN ANTI-CLOCK WATERMARK PRINTED IN A SPECIAL INK

**OFFICIAL CHECK**

HOLD THE DOCUMENT AT A SMALL ANGLE TO SEE THIS SECURITY FEATURE

23-92  
1020

**239296807**

Issued By Integrated Payment Systems Inc., Englewood, Colorado  
Bank One, NA, Denver, Colorado

09/05/2003

PAY ONE THOUSAND DOLLARS AND 00 CENTS \$ 1000.00

For 6106823683

DRAWER: THE BANK OF NEW YORK

TO THE ORDER OF Treasurer, State of NJ  
NJDEP-DRS  
ORAE - OFFICE OF ACCOUNTABILITY  
401 E STATE ST 5TH FL W TRENTON NJ 08625

201007

AUTHORIZED SIGNATURE - [Signature]

⑈ 340565⑈ ⑆ 102000979⑆ 68002392968098⑈

THE VARIABLE TONE BACKGROUND AREA OF THIS DOCUMENT CHANGES COLOR GRADUALLY AND SMOOTHLY FROM DARKER TONES AT BOTH TOP AND BOTTOM TO THE LIGHTEST TONE IN THE MIDDLE



State of New Jersey

Department of Environmental Protection

James E. McGreevey  
Governor

Bradley M. Campbell  
Commissioner

Bureau of Risk Management, Initial Notice, and Case Assignment  
ISRA Initial Notice

P.O. Box 435  
401 East State Street, 5<sup>th</sup> Floor  
Trenton, NJ 08625-0435

Douglas I. Eilender, Esq.  
Cole, Schotz, Meisel, Forman & Leonard, PA  
Court Plaza North, 25 Main Street  
Hackensack, NJ 07601

SEP 9 - 2003

Re: CasChem, Inc  
40 Avenue A, Bayonne, Hudson County  
ISRA Case #E20030351

Dear Sir:

This letter serves to advise you, the authorized agent for CasChem, Inc that the New Jersey Department of Environmental Protection (Department) has received a complete Industrial Site Recovery Act (ISRA) General Information Notice (GIN).

CasChem, Inc is required to complete all applicable remediation activities following the minimum requirements set forth at N.J.A.C. 7:26E, the Technical Requirements for Site Remediation, which became effective February 3, 2003. It is expected that these remediation activities will be completed within the time frames indicated on the CasChem, Inc GIN, as required pursuant to N.J.A.C. 7:26B-3.3(a)10i or 10ii. Should CasChem, Inc determine that it is necessary to deviate from the expected schedule of implementation, then CasChem, Inc shall submit a revised schedule of implementation for the completion of each phase of the investigation. The remedial activities shall be conducted as specified below:

1. The completion of a Preliminary Assessment (PA) in accordance with N.J.A.C. 7:26E-3.1 and the submission of a PA Report as per N.J.A.C. 7:26E-3.2 along with a negative declaration, as long as no areas of concern are identified in the PA that require the completion of a Site Investigation. Please note failure to disclose and address all areas of concern can result in unnecessary case delays. Please refer to N.J.A.C. 7:26E-1.8 to ensure that all areas of concern have been identified.

The PA form can be downloaded from the Department's Internet website at <http://www.state.nj.us/dep/srp/isra/forms.htm>.

2. If necessary, the completion of a Site Investigation (SI) in accordance with N.J.A.C. 7:26E-3.3 through 3.12 and the submission of the PA/SI Report in accordance with N.J.A.C. 7:26E-3.13 along with a negative declaration, as long as the SI reveals no contamination above applicable remediation standards or criteria; or
3. If the SI reveals contaminants with levels above applicable remediation standards or criteria and those contaminants require further delineation and/or remediation, the submission of a Remedial Investigation (RI) Workplan prepared in accordance with N.J.A.C. 7:26E-3.2, 3.13 and 4.2, for Department review and approval.

Please note all reports submitted to the Department will not be reviewed unless they are submitted with the required review fee pursuant to N.J.A.C. 7:26B-8. Furthermore, if during any phase of remediation, CasChem, Inc discovers that a discharge has occurred, then CasChem, Inc is required to notify the Spill Hotline at 1-877-927-6337.

Furthermore, the Technical Regulations require electronic data submittal of all analytical results. All data submitted shall conform to the "Reduced Laboratory Deliverables Format" consistent with the guidance contained in the Tech Rules. The data shall be presented as a hard copy and an electronic deliverable format using one of the following:

- a. Use of the Hazardous Site Information Application (HazSite),
- b. Submittal in a Lotus-compatible spreadsheet format [\* .wk1 file],
- c. Though not stated in Tech Rules, a .DBF (FoxPro, Dbase) file format is acceptable.

The Electronic Data Interchange Handbook and a copy of the current HAZSITE application software may be obtained from the Department by calling (609) 633-1476. A diskette shall be submitted directly to your assigned case manager. Additional information regarding the HAZSITE application may be obtained through the Department's Internet web site at <http://www.state.nj.us/dep/srp>. Enter into the Regulations & Guidance icon to find the HAZSITE icon. Reports submitted without the required electronic data will not receive a final written approval from the Department.

All submittals must have three separate files. The files must be named as follow:

- a. DTST
- b. HZSAMPLE
- c. HZRESULT

The Department has received several diskettes and the most common error has been the naming of the files. The files must be named exactly as referenced above with the required mandatory fields. The file name should not reference the case name, SRP ID or any other identifier.

If remediation of soil and/or ground water has been completed, CasChem, Inc is required to submit the total capital costs involved in performing and confirming a cleanup as well as the costs associated with the proper disposal of all wastes generated during the cleanup. Costs to be reported include monitoring systems, equipment and mobilization costs; operational and maintenance costs, including all labor, utilities and repairs; consulting and labor costs, and sample costs; all disposal costs, including transport, waste transfer and facility tipping fees as well as regulatory review fees.

Be advised, soil remedial activities that will take longer than 5 years, and remedial actions involving groundwater and/or surface water require Department approval prior to implementation.

Finally, ISRA imposes as a precondition of a sale of business, assets or property, that the owner or operator must first obtain a No Further Action approval, a Remedial Action Work Plan approval, or a Remediation Agreement.

Should you have any questions regarding this correspondence, you may contact me at (609) 292-6296 or [william.goodman@dep.state.nj.us](mailto:william.goodman@dep.state.nj.us).

Sincerely,



Bill Goodman, Case Manager  
Bureau of Risk Management, Initial Notice,  
and Case Assignment

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

COURT PLAZA NORTH

25 MAIN STREET

P.O. BOX 800

HACKENSACK, NEW JERSEY 07602-0800

(201) 489-3000

FAX (201) 489-1536

www.coleschotz.com

telecommunication device for the deaf  
(201) 489-3015

767 THIRD AVENUE

NEW YORK, NEW YORK 10017

(212) 752-0110

FAX (212) 751-8335

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EDWARD M. SCHOTZ  
MICHAEL S. MEISEL  
MICHAEL H. FORMAN  
STANLEY DIZENHAJ  
IRVIN M. LEONARD  
THOMAS F. LA MONTE  
WALTER K. HELLER  
HENRY N. WATZ  
OSWALD H. OLIVE  
RICHARD R. SARRA  
MARCO H. POLONITSKY  
STEVEN R. RIZZO  
ADRIAN R. BERSHAW  
HENRY N. GREGG  
SAMUEL WEINER  
RICHARD W. ARNHEIM  
MICHAEL S. LEONOWITZ  
STEVEN D. LEITZEL  
ANDREW R. DODD  
STUART BONDURSKI  
OLEND D. KASLOW

PROFESSIONAL CORP. TAX  
AGENCY

NICHOLE D. STROTNA  
ALAN BERKMAN  
GUYTON I. ASHEN  
MICHAEL S. JONES  
NORRIS A. OSTERMAYER  
DEBORAH H. SPANA  
LEO V. LACINA  
DAVID M. KOSINSKI  
LEONARD H. WOLF  
JIM ALAN LINTAS  
JEFFREY H. CORCUTT  
ILAN VOLKOFF  
M. JOHN SARRA  
KATHLEEN N. ARNHEIM  
NICHOLE D. STROTNA  
MARGI P. BRESLA  
EDWARD A. ETEL  
KENNETH L. SARRA  
STEVEN L. KLEPPER  
LEO T. WELFA  
DAVE M. KLEINBERG  
WENDEE K. SHACONE  
KAROL W. ZACHARSKI

RICHARD D. WOLLOCH  
CARL A. RIZZO  
OSWALD H. GREGG  
THOMAS LEONARD COHEN  
SPECIAL INVESTOR

ROBERT J. SCORIO  
MARION W. FADDEA  
SHARON FRIDEN HANCO  
MARK N. SCHWARTZ  
MARK L. ZWOLOFF  
JAMES P. CLARE  
ROBERT P. BLUM  
CHRISTOPHER W. HODGE  
CHRISTOPHER S. BOSTYCKA  
K. JOSEPH GRINBERG  
GARY A. WILLENRO  
JENNIFER A. FISCH  
LESLIE J. SPANO, JR. &  
MICHAEL W. HERRMAN  
MICHAEL N. SOFFER  
JONAH N. SHACONE  
JAMES T. KIM  
CHRISTOPHER STRANDE  
DAVID P. STEINBERG  
JOHN W. COHEN  
CINDY V. BAZZANO  
JOSEPH WAPARTINA  
DANIEL J. ELLENBERG  
JAMES M. STORNA  
MICHAEL S. KANARICK  
FRANCO D. COOPERMAN  
CHRISTOPHER J. CARLSON  
ALEXANDER R. LANGE  
DANIEL E. SPITZ  
JILL A. WEINSTEIN  
LEAHAN M. SUTCHER  
DAVID T. SHYBA  
CHRISTIN S. SELLERS  
ANDREW P. KAPLAN  
ALEXANDER P. PERES  
EDWARD D. SHWARTZ III

AUG 15 2003  
\* SE 4 01 0000  
\* SE 4 02 0000  
\* SE 4 03 0000  
\* SE 4 04 0000

WELLY TO HACKENSACK OFFICE

WRITER'S DIRECT LINE:  
(201) 479-6705

WRITER'S DIRECT FACSIMILE:  
(201) 478-6269

WRITER'S MAIL ADDRESS:  
dolanm@coleschotz.com

August 15, 2003

**VIA FACSIMILE & FEDERAL EXPRESS**

Ms. Tina Layre  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Remediation  
Bureau of Field Operations - ISRA Initial Notice  
401 East State Street, 5th Floor  
Trenton, NJ 08625-0435

Re: CasChem, Inc. to Rutherford Acquisition Corp.  
c/o Arsenal Capital Partners  
40 Avenue A, Bayonne, NJ  
Our File No. 38316.0004

Dear Ms. Layre:

Enclosed please find a General Information Notice ("GIN") with the \$100 initial notice fee. Our client is planning to close the referenced transaction transferring the property, the business and the assets to Rutherford Acquisition Corp. c/o Arsenal Capital Partners between September 21, 2003 and October 11, 2003. In addition, our client anticipates submitting a Remediation Agreement to your office shortly.

7. Purchaser or New Lessee:

Contact Name Mr. Salvatore Gagliardo Telephone # (845) 782-1204

Firm Rutherford Chemicals, LLC

Street Address 41 Arden House Road, Route 17

Municipality Harriman State NY Zip Code 10926

State of incorporation, if applicable: Delaware

Type of Business Association and General Partner(S), if applicable:

Limited Liability Company

8. Attach a detailed cost estimate for remediation of the industrial establishment(s). N/A

9. Have there been any previous ISRA/ECRA Remediation Agreements/Administrative Consent Orders executed for this Industrial Establishment or another Industrial establishment, which occupied the same tax block and lot number? (Attach additional sheets if more than one industrial establishment is included in this application.)

       Yes      X No

If Yes, Name of Industrial Establishment \_\_\_\_\_

ISRA/ECRA Case No. \_\_\_\_\_ Date Submitted \_\_\_\_\_

Ordered/Responsible Party: \_\_\_\_\_

Current Status: \_\_\_\_\_ Current Case Manager: \_\_\_\_\_

Has this Industrial Establishment received a No Further Action Letter or Negative Declaration Approval?

       Yes (please provide copy)      X No

10. Is this request for an amendment to the existing Remediation Agreement/Administrative Consent Order?

       Yes      X No

11. Circle the type of remediation funding source, other than a Self-Guarantee\*, to be submitted in an amount equal to the estimated cost of remediation: Self-Guarantee

Line of Credit

Environmental Insurance Policy

Remediation Trust Fund

\*NOTE: If the type of remediation funding source chosen is a Self-Guarantee it must be submitted with this application for a Remediation Agreement in accordance with N.J.A.C. 7:26C-7.

12. Individual/Agent submitting this request for a Remediation Agreement:

Name Douglas I. Eilender, Esq. Telephone # (201) 525-6205

Firm Cole, Schotz, Meisel, Forman & Leonard, P.A.

Street Address Court Plaza North, 25 Main Street

Municipality Hackensack State NJ Zip code 07601

13. AUTHORIZATIONS/CERTIFICATIONS:

A. Owner or Operator Statutory Liability:

1. I hereby certify that I am fully aware of the requirements of the Industrial Site Recovery Act, N.J.S.A. 17:27 et seq., as it pertains to the remediation of the industrial establishment subject to this remediation agreement. Specifically, I am fully aware of the responsibilities of the owner or operator of the industrial establishment to remediate the site in accordance with ISRA and this chapter. I acknowledge that a remediation agreement has been requested to allow the transaction referenced in the remediation agreement application to proceed prior to completing all ISRA compliance requirements and that the person entering into the remediation agreement is agreeing to comply with all ISRA requirements. I further acknowledge that the execution of a remediation agreement shall not release [Person] from any responsibilities [Person] have pursuant to ISRA and this chapter.

Typed/Printed Name Peter E. Thauer Title Vice President, CasChem

Signature Peter E. Thauer Date 9/12/03

Sworn to and Subscribed Before Me on this 12<sup>th</sup> Date of September 20 03

Notary Mary E. Fletcher - Attorney at Law State of New Jersey

2. I hereby certify that I acknowledge that the transaction and industrial establishment that are the subject of this remediation agreement is a transfer of ownership or operations of an industrial establishment as defined by ISRA, N.J.A.C. 7:26B. I further acknowledge that [Person] is subject to penalties for violations of ISRA and N.J.A.C. 7:26B. I am fully aware of [Person's] responsibilities to allow the Department access to the subject industrial establishment and to prepare and submit any documents relevant to the remediation of the subject industrial establishment as required by the Department.

Typed/Printed Name Peter E. Thauer Title Vice President, CasChem

Signature Peter E. Thauer Date 9/12/03

Sworn to and Subscribed Before Me on this 12<sup>th</sup> Date of September 20 03

Notary Mary E. Fletcher - Attorney at Law, State of New Jersey

Cole, Schoutz, Meisel, Forman & Leonard, P.A.  
counselors at law

Ms. Tina Layre  
August 15, 2003  
Page 2

Should you have any questions or need additional information, please do not  
hesitate to contact me.

Very truly yours,

**Douglas I. Eilender**

Douglas I. Eilender

DIE:dxe

cc: Mary E. Fletcher, Esq.  
Gordon C. Duus, Esq.  
Gary M. Albrect, Esq.





Municipality \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

2. Have there been any previous or concurrent ISRA/ECRA submissions (including Applicability Determinations or De minimus Quantity Exemption Application) by this Industrial Establishment or another Industrial Establishment, which occupied the same tax block and lot number?

\_\_\_\_\_ Yes  No

If Yes, Name of Industrial Establishment \_\_\_\_\_

ISRA/ECRA Case No. \_\_\_\_\_ Current Status \_\_\_\_\_

3. Has the same property occupied by the Industrial Establishment in #1A - #1C above received a No Further Action Letter or Negative Declaration Approval?

\_\_\_\_\_ Yes (please provide copy)  No

If Yes, was the No Further Action Letter or Negative Declaration Approval for the entire establishment defined in question #1 of this application \_\_\_\_\_ or for a portion of the industrial establishment defined in question #1 of this application \_\_\_\_\_? (Place an "X" after the appropriate statement)

4. Indicate the transaction(s), which initiates the ISRA review. Check all that apply (see N.J.A.C. 7:26B-3.2 & 3.3):

Sale of Property                       Sale of Business                       Sale of Assets  
\_\_\_\_\_ Cessation                      \_\_\_\_\_ Foreclosure                      \_\_\_\_\_ Stock Transfer/Corporate Merger  
\_\_\_\_\_ Bankruptcy                      \_\_\_\_\_ Partnership Situation Change  
\_\_\_\_\_ Other (attach documentation to explain)

5. If a cessation of operations is involved at this location provide the following information: *N/A*

A. Provide the date of the public release of the decision to close the facility \_\_\_\_/\_\_\_\_/\_\_\_\_

B. Provide the date that operations ceased \_\_\_\_/\_\_\_\_/\_\_\_\_, or

C. Provide the date that operations will cease \_\_\_\_/\_\_\_\_/\_\_\_\_.

6. If the transaction initiating an ISRA review is an agreement of sale or execution of an option to purchase, fill in the date of execution of that instrument below. Provide one (1) copy of the document if also applying for a Remediation Agreement.

A. Is a sale involved?  Yes \_\_\_\_\_ No (If no, skip 4B, C and D.)

B. Provide the date of the Agreement/Notifications of Option to Purchase 8 / 7 / 03

C. Provide the date proposed for transfer of title 9 / 21 / 03 to 10 / 11 / 03

D. Please complete the following:

NAME OF PARTY/PURCHASER: Rutherford Acquisition Corp. c/o Arsenal Capital Partners

ADDRESS: 1350 Avenue of the Americas, 27<sup>th</sup> Floor

PHONE #: 978-392-8739 CONTACT PERSON Tim Zappala

If a sale is involved, I understand as the contract seller that if the agreement is terminated then I am no longer required to obtain a no further action letter or authorization letter from the Department. In accordance with N.J.A.C. 7:26B-3.4 a withdrawal affidavit will be submitted stating the reasons why compliance with ISRA no longer applies to the site referenced in Question 1A above.

7. Authorized agent designated to work with the Department.

*new agent*

Name Douglas I. Eilender, Esq. Telephone Number (201) 525-6205  
Firm Cole, Schotz, Meisel, Forman & Leonard, P.A.  
Street Address Court Plaza North, 25 Main Street  
Municipality Hackensack State NJ Zip Code 07601

8. Pursuant to N.J.A.C. 7:26B-1.9, by the submission and certification of this document, the owner/operator gives his or her consent to the entry of the industrial establishment by the Department and its authorized representatives during any phase of remediation, upon the presentation of credentials, to inspect the site.

9. Pursuant to N.J.A.C. 7:26B-3.3(a)10, the owner/operator shall perform all remedial activities according to one of the following schedules (check the appropriate statement):

All remedial activities will be done in accordance with the schedule set forth at N.J.A.C. 7:26B-6.1, 6.2 and 6.3.

All remedial activities will be done in accordance with the enclosed alternate schedule.

10. Do you consider this site to be a "Brownfield" as defined below:  Yes  No

"Brownfield Site" means any former or current commercial or industrial site that is currently vacant, underutilized or the remediation is being conducted with the intent to pursue redevelopment and which there has been, or is suspected to have been a discharge of a contaminant.

11. Please provide the name and mailing address of the individual or representative of the firm responsible for conducting the remediation subject to this filing. The Department will address the final no further action/ covenant not to sue determination for the industrial establishment to the listed representative. All other correspondence from the Department will be directed to the authorized agent listed in item 7 above.

Does the listed individual or firm own the property \_\_\_\_\_, business \_\_\_\_\_, or both CasChem, Inc. owns the property and the business? (Place a check in the appropriate space)

Name Mr. Seth Levine Title Director of Regulatory Affairs  
Firm on behalf of CasChem, Inc. c/o Cambrex Corporation Telephone # (732) 447-1913  
Street Address Technology Center of New Jersey, 661 Highway One, North Brunswick, NJ 08902  
Municipality North Brunswick State NJ Zip Code 08902

*Per Caschem letter dated 11/17/03, Seth Levine is both agent and RP*

*(Signature)*

**CERTIFICATION:**

The following certification shall be signed pursuant to the requirements of N.J.A.C. 7:26B-1.6(e).

An individual who is familiar with the Industrial Establishment through on-site observation must sign the certification. The individual must be in a position of authority that can attest to the accuracy of the response to each question. When the situations arise, the certification shall be executed as follows:

1. For a corporation or limited liability company, 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 proprietor, respectively;
3. For a municipality, state, Federal or other public agency, by either a principal executive officer or ranking elected official; or
4. By a duly authorized representative of a corporation, partnership, sole proprietorship, municipality, state or Federal or other public agency, as applicable. A person is deemed to be a duly authorized representative if the person is authorized in writing by an individual described in 1, 2, or 3 above and the authorization meets the following criteria:
  - The authorization specifies either an individual or a position having responsibility for the overall operation of the industrial establishment or activity, such as the position of plant manager, or superintendent or person of equivalent responsibility (a duly authorized representative may thus be either a named individual or any individual occupying a named position);
  - The written authorization is submitted to the Department; and
  - If an authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the industrial establishment or activity, a new authorization satisfying the requirements listed above 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 under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-13.

Typed/Printed Name Peter E. Thauer Title Vice President

Signature *Peter E. Thauer* Date 8/14/03

Sworn to and Subscribed Before Me

on this 8<sup>th</sup> 14<sup>th</sup> day of August 2003

Notary *Mary Fletcher*  
attorney at law - State of New Jersey



State of New Jersey

James E. McGreevey  
Governor

Department of Environmental Protection

Bradley M. Campbell  
Commissioner

Bureau of Risk Management & Initial Notice & Case Assignment

ISRA Initial Notice  
P.O. Box-435  
401 East State Street  
Trenton, NJ 08625-0435

Seth Levine, P.E.  
Cambrex Corporation  
661 Route 1 South  
North Brunswick, NJ 08902

July 9, 2004

Re: CasChem, Inc.  
40 Avenue A, Bayonne, Hudson County  
ISRA Case # E20030351

Dear Mr. Levine:

This is to advise you, as authorized agent, of the status of the referenced case submitted under the provisions of the Industrial Site Recovery Act (N.J.S.A. 13:1K-6 et seq.) Based upon the cursory review of the most recent information provided to the Bureau Risk Management Initial Notice & Case Assignment, ISRA Initial Notice Section, the case is being transferred to the Bureau of Northern Case Management for a more in-depth evaluation. Because of the size or nature of the investigation completed by CasChem, Inc. the Initial Notice section can not spend the time that the case demands to ensure that the proposed action is protective of human health and the environment. The in-depth report review will be scheduled by a case manager in BNCM based on the bureaus current workload. In general all reports are reviewed based on the priority of first in first out unless environmental circumstances necessitate a quicker review due to an immediate environmental concern.

Because of current workload issues within BNCM the case will not be assigned to a case manager for review for approximately 4-6 weeks. In accordance with ISRA you may continue with your investigation without Department oversight or you may wait for Department review of your proposals. Be advised, soil remedial actions that will take longer than 5 years, and remedial actions involving ground water and/or surface water require Department approval prior to implementation. If transaction timeframes become an issue the Department recommends that you obtain a Remediation Agreement to ensure that you may meet your expected schedule.

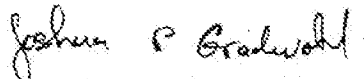
Please forward two (2) more copies of the Preliminary Assessment report to BNCM as soon as possible for review by the case team once the case is assigned.

If you choose to continue without Department review of your proposal please forward a notice of your intent with a schedule of implementation to the attention of Maurice Migliarino, Section Chief at:

New Jersey Department of Environmental Protection  
Bureau of Northern Case Management  
P.O. Box 432  
401 East State Street  
Trenton, N.J. 08625-0432

Kindly refer to the referenced case name and number in all future correspondence. You will be notified by written correspondence upon assignment to a case manager.

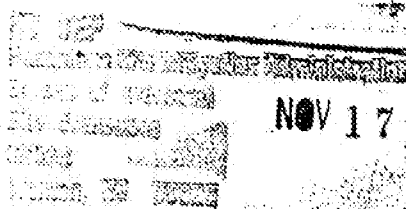
Sincerely,

A handwritten signature in black ink that reads "Joshua P. Gradwohl". The signature is written in a cursive style with a large initial 'J'.

Joshua Gradwohl, Supervisor  
Bureau Risk Management Initial Notice & Case Assignment

# CasChem

A CAMBREX COMPANY



CasChem, Inc.  
40 Avenue A  
Bayonne, NJ 07008  
Tel. # (201) 856-7800  
Fax # (201) 437-2728

via federal express  
November 13, 2003

New Jersey Department of Environmental Protection  
Division of Remediation Management and Response  
Responsible Party Remediation Element  
401 East State Street  
P.O. Box 432  
Trenton, NJ 08625-0028

RE: ISRA Case #20030351  
CasChem, Inc.  
40 Avenue A  
Bayonne, NJ

As set forth in Paragraph 13 of the November 10, 2003 Remediation Agreement between CasChem, Inc. (CasChem) and the State of New Jersey Department of Environmental Protection (the Department), CasChem hereby informs the Department that Mr. Seth P. Levine is CasChem's technical contact and agent relating to the Remediation Agreement for the above referenced ISRA project.

Mr. Levine's contact information is as follows:

Seth Levine, P.E., CasChem Technical Contact  
c/o  
Cambrex Corporation  
661 Route 1 South  
North Brunswick, New Jersey 08902  
Tel:(732)447-1913  
Fax:(732)447-1910  
E-mail: [seth.levine@cambrex.com](mailto:seth.levine@cambrex.com)

The transaction that triggered the CasChem ISRA process was completed on November 10, 2003. CasChem intends to contract with Earth Tech as our environmental consultant in the near future and begin the Preliminary Assessment. CasChem proposes the following initial schedule in accordance with the Remediation Agreement:

May 8, 2003(180 days from November 10, 2003)

\*Submittal of Preliminary Assessment Report

\*Submittal of the schedule for the completion of the site investigation report and remedial investigation work plan as applicable

If there are any questions or comments regarding the foregoing, please contact Mr. Levine. We look forward to the successful completion of this project with the NJDEP.

Sincerely,



Mary E. Fletcher  
Counsel  
CasChem, Inc.

cc: Seth Levine

Lewis Putman, Esq.  
Kirkland & Ellis LLP  
655 Fifteenth Street, N.W.  
Washington, D.C. 20005-5793

Douglas Eilender  
Cole, Schotz, Meisel, Forman & Leonard, PA  
Court Plaza North  
25 Main Street  
Hackensack, NJ 07601



RECEIVED

**CasChem**

A CAMBREX COMPANY

CasChem, Inc.  
40 Avenue A  
Beyonne, NJ 07002  
Tel. # (201) 858-7900  
Fax # (201) 437-2728

via facsimile (609-633-1439) and regular mail

November 14, 2003

Tina Layre, Supervisor  
State of New Jersey  
Department of Environmental Protection  
Division of Remediation Support  
Oversight Resources Allocation Element  
Office of Accountability  
401 East State Street -- 5<sup>th</sup> Floor, West  
Trenton, New Jersey 08625

RE: Remediation Agreement In the Matter of CasChem, Inc.  
ISRA Case # 20030351

Dear Ms. Layre:

Enclosed please find one executed original of the Remediation Agreement between CasChem and the State of New Jersey Department of Environmental Protection. The transaction that triggered the ISRA process at CasChem closed on November 10, 2003.

If you should have any questions, please contact me at 201-804-3043.

Sincerely,

  
Mary E. Fletcher

cc: Lewis Putman, Esq.  
Kirkland & Ellis, LLP  
655 Fifteenth Street, N.W.  
Washington, D.C. 20005-5793

Douglas Eilender  
Cole, Schotz, Meisel, Forman & Leonard, PA  
Court Plaza North  
25 Main Street  
Hackensack, NJ 07601

TIERRA-B-016445



State of New Jersey

Department of Environmental Protection

James E. McGreevey  
Governor

Bradley M. Campbell  
Commissioner

IN THE MATTER OF  
THE BAYONNE SITE  
CASCHEM, INC. : REMEDIATION  
: AGREEMENT

ISRA Case #20030351

This Remediation Agreement is issued and entered into pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection, (hereinafter the "NJDEP") by N.J.S.A. 13:1D-1 et seq., the Industrial Site Recovery Act, N.J.S.A. 13:1K-6 et seq., and the Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 through 23.14 and duly delegated to the Assistant Director within the Division of Remediation Support pursuant to N.J.S.A. 13:1B-4.

**FINDINGS**

1. The property that is the subject of this Remediation Agreement is operated and owned by CasChem, Inc. It is located at 40 Avenue A and is designated as Block(s) 360, 361 and 362, Lot(s) 1, 12 and 3 on the tax maps of the City of Bayonne, Hudson County, New Jersey (hereinafter the "Bayonne industrial establishment" or the "Site"). The Standard Industrial Classification ("SIC") number which best describes the operations at the Bayonne industrial establishment is 2869.

2. On September 17, 2003, CasChem, Inc. submitted to NJDEP an application for a Remediation Agreement pursuant to N.J.A.C. 7:26B-4.1. This Remediation Agreement application is incorporated herein by reference and includes the following information:

A. Transaction

Seller: CasChem, Inc., a Delaware corporation

Buyer: Rutherford Chemicals, LLC, a Delaware limited liability company

Description: CasChem, Inc. has entered into an agreement to sell its business assets and real property at the Bayonne industrial establishment to Rutherford Chemicals, LLC. Operations will continue at the Site.

B. Responsible Person(s) executing this Remediation Agreement and responsible for conducting the remediation of the Bayonne industrial establishment.

Lead Responsible

Name: CasChem, Inc.  
Address: 40 Avenue A  
Bayonne, NJ 07002  
Telephone No. (201) 858-7900

3. The NJDEP and CasChem, Inc. expressly agree that the terms and conditions of this Remediation Agreement shall apply to the industrial establishment listed in Paragraph 1 above. Furthermore, NJDEP and CasChem, Inc. agree to administer and complete all applicable ISRA program requirements, including the remediation funding source requirements and any other remedial measures undertaken pursuant to this Remediation Agreement and ISRA, for the industrial establishment.

4. The transaction described in Paragraph 2 above is the transfer of ownership or operations of an industrial establishment as defined by ISRA. NJDEP and CasChem, Inc. expressly agree that the transaction described in Paragraph 2 above is subject to ISRA. CasChem, Inc. has requested that NJDEP prepare a Remediation Agreement which, when effective, will allow the transaction described in Paragraph 2 above to be in compliance with ISRA prior to the completion of all administrative and remediation requirements pursuant to ISRA.

5. By entering into this Remediation Agreement, CasChem, Inc. neither admits to any fact, fault or liability under any statute or regulation concerning the condition of the Site nor waives any rights or defenses with regard to the site except as specifically provided in this Remediation Agreement.

**AGREEMENT**

I. Remediation

1. CasChem, Inc. agrees to remediate the Bayonne industrial establishment and to submit the following documents as established below:

A. Within one hundred and eighty (180) calendar days after the NJDEP's receipt of the General Information Notice or such additional time as authorized by NJDEP, CasChem, Inc. shall submit a preliminary assessment report, site investigation report, and remedial investigation work plan, as applicable, prepared in accordance with N.J.A.C. 7:26E or CasChem, Inc. shall submit a Negative Declaration for the Bayonne industrial establishment.

B. Within three hundred (300) calendar days after the NJDEP's receipt of the General Information Notice or within one hundred twenty (120) calendar days from receipt of NJDEP's written approval of the Remedial Investigation Workplan or longer as authorized by NJDEP, CasChem, Inc. shall submit a Remedial Investigation Report in accordance with N.J.A.C. 7:26E or CasChem, Inc. shall submit a Negative Declaration for the Bayonne industrial establishment.

C. Within four hundred and twenty (420) calendar days after the NJDEP's receipt of the General Information Notice or within one hundred and twenty (120) calendar days from receipt of NJDEP's written approval of the Remedial Investigation Report or longer as authorized by NJDEP, CasChem, Inc. shall submit a Negative Declaration for the Bayonne industrial establishment, or CasChem, Inc. shall submit a Remedial Action Work plan as applicable, prepared in accordance with N.J.A.C. 7:26E.

D. The NJDEP will review all documents in accordance with N.J.A.C. 7:26B and N.J.A.C. 7:26E.

2. If NJDEP determines any submittal made under this section is inadequate or incomplete, the NJDEP shall provide CasChem, Inc. with written notification of each deficiency, and CasChem, Inc. shall revise and resubmit the required information within thirty (30) calendar days, or longer as authorized by NJDEP, from receipt of such notification. The determination as to whether or not the submittal, as modified, conforms to the Technical Requirements for Site Remediation, N.J.A.C. 7:26E and the Department's written comments and is otherwise acceptable to by the Department shall be made solely by the Department in writing.

3. If the NJDEP determines that no further action is required at the Bayonne industrial establishment, CasChem, Inc. shall submit a negative declaration, in accordance with N.J.A.C. 7:26B-6.7, within thirty (30) calendar days or longer as authorized by NJDEP from receipt of the NJDEP's request for the submission of the negative declaration.

4. Nothing in this Remediation Agreement shall be construed to limit, restrict or prohibit any Person(s) responsible for conducting the remediation of the Bayonne industrial establishment from implementing any applicable ISRA compliance options in accordance with N.J.A.C. 7:26B-5 to satisfy the requirements of ISRA.

5. If at any time that this Remediation Agreement is in effect the NJDEP determines that the requirements of N.J.A.C. 7:26E are not being achieved or that additional remediation is required to protect the public health and safety or the environment from contamination at the Site, CasChem, Inc. shall conduct such additional remediation as the NJDEP directs.

6. The NJDEP will consider a request for an extension of time to perform any requirement under this Remediation Agreement, provided that any extension request is submitted to the NJDEP fourteen (14) calendar days prior to any applicable deadline to which the extension request refers.

II. Remediation Funding Source and Remediation Funding Source Surcharge

7. CasChem, Inc. agrees to establish and maintain for the duration of this Remediation Agreement a remediation funding source in an amount equal to the Department-approved estimate of the remediation costs related to compliance with this Remediation Agreement, including all operation, maintenance and monitoring costs of all engineering and institutional controls, pursuant to N.J.A.C. 7:26E-8, used to remediate the Site, pursuant to N.J.A.C. 7:26C-7. CasChem, Inc. agrees that the initial remediation funding source amount is \$100,000.00.
8. CasChem, Inc. agrees to pay an annual remediation funding source surcharge if required to do so pursuant to N.J.A.C. 7:26C-7.8.

III. Project Cost Review

9. Beginning three hundred sixty-five (365) calendar days after the effective date of this Remediation Agreement, and annually thereafter on the same calendar day, CasChem, Inc. agrees to submit to the Department a detailed review of all remediation costs expended by CasChem, Inc. to comply with this Remediation Agreement, including:
- a) A detailed summary of all monies spent to date pursuant to this Remediation Agreement;
  - b) The detailed estimated remediation costs required to comply with this Remediation Agreement, including all operation, maintenance and monitoring costs; and
  - c) The reason for any changes from the previously submitted cost review.
10. At any time after CasChem, Inc. submits the first cost review pursuant to the preceding paragraph CasChem, Inc. may request the Department's approval to reduce the amount of the remediation funding source to reflect the remaining remediation costs necessary to comply with obligations under this Remediation Agreement. If the Department grants written approval to such a request, CasChem, Inc. may amend the amount of the then existing remediation funding source consistent with that approval.
11. If the estimated costs of meeting CasChem, Inc.'s obligations in this Remediation Agreement at any time increase to an amount greater than the remediation funding source, CasChem, Inc. agrees to within thirty (30) calendar days after receipt of written notice of the Department's determination, increase the amount of the then existing remediation funding source or provide an additional remediation funding source such that the total amount equals the Department's approved estimated cost.
12. If CasChem, Inc. implements a remedial action at the site that includes institutional and/or engineering controls pursuant to N.J.A.C. 7:26E-8, the CasChem, Inc. agrees to maintain a remediation funding source, pursuant to N.J.A.C. 7:26C-7, in an amount that is sufficient to pay for the operation, maintenance and monitoring of the engineering and institutional.

IV. Project Coordination

13. Within seven (7) calendar days after the effective date of this Remediation Agreement, CasChem, Inc. shall submit to the NJDEP the name, title, address and telephone number of the individual who shall be CasChem, Inc. technical contact for the NJDEP for all matters concerning this Remediation Agreement and CasChem, Inc. shall designate an agent for the purpose of service for all matters concerning this Remediation Agreement and shall provide the NJDEP with the agent's name and address.

14. Unless otherwise directed by NJDEP, any submission to be made to NJDEP in accordance with this Remediation Agreement and ISRA shall be directed to:

New Jersey Department of Environmental Protection  
Division of Remediation Management and Response  
Responsible Party Remediation Element  
401 East State Street  
P.O. Box 432  
Trenton, NJ 08625-0028

V. Oversight Cost Reimbursement

15. All submissions required pursuant to this Remediation Agreement shall be accompanied by all appropriate fees pursuant to N.J.A.C. 7:26B-8.

16. Within thirty (30) calendar days after receipt from the NJDEP of a written summary, conforming to N.J.A.C. 7:26B-8.2, of the NJDEP's oversight costs, including all accrued interest incurred pursuant to the paragraph below, determined pursuant to N.J.A.C. 7:26B-8, CasChem, Inc. shall submit to the NJDEP a cashier's or certified check payable to the "Treasurer, State of New Jersey" and submitted with DEP Form 062A in accordance with N.J.A.C. 7:26B-8.4, for the full amount of the NJDEP's oversight costs. Nothing contained in the paragraph shall be construed to limit or restrict any CasChem, Inc.'s ability to contest any oversight costs calculated pursuant to N.J.A.C. 7:26B-8.2(d) in accordance with the oversight cost review procedures at N.J.A.C. 7:26B-8.3.

17. Interest shall accrue on the unpaid balance of oversight costs, beginning at the end of the thirty (30) calendar day period established in the preceding paragraph, at the rate established by Rule 4:42 of the current edition of the Rules Governing the Courts of the State of New Jersey.

VI. Force Majeure

18. If any event specified in the following paragraph occurs which CasChem, Inc. believes or should believe will or may cause delay in the compliance or cause non-compliance with any provision of this Remediation Agreement, CasChem, Inc. shall notify the NJDEP in writing within seven (7) calendar days of the start of delay or knowledge of the anticipated delay, as

appropriate, referencing this paragraph and describing the anticipated length of the delay, the precise cause or causes of the delay, any measures taken or to be taken to minimize the delay, and the time required to take any such measures to minimize the delay. CasChem, Inc. shall take all necessary action to prevent or minimize any such delay.

19. The NJDEP will extend in writing the time for compliance for a period no longer than the delay resulting from such circumstances as determined by the NJDEP only if:

(a) CasChem, Inc. have complied with the notice requirements of the preceding paragraph;

(b) Any delay or anticipated delay has been or will be caused by fire, flood, riot, strike or other circumstances beyond the control of CasChem, Inc.; and

(c) CasChem, Inc. have taken all necessary action to prevent or minimize any such delay.

20. The burden of proving that any delay is caused by circumstances beyond the control of CasChem, Inc. and the length of any such delay attributable to those circumstances shall rest with CasChem, Inc..

21. "Force Majeure" shall not include the following:

(a) Delay in an interim requirement with respect to the attainment of subsequent requirements;

(b) Increases in the cost or expenses incurred by CasChem, Inc. in fulfilling the requirements of this Remediation Agreement;

(c) Contractor's breach, unless CasChem, Inc. demonstrates that such breach falls within paragraph 19 above; and

(d) Failure to obtain access required to implement this Remediation Agreement, unless denied by a court of competent jurisdiction.

#### VII. Reservation of Rights

22. By entering into this Remediation Agreement, the NJDEP does not waive its right to seek, assess or collect civil or civil administrative penalties or any other legal or equitable relief against CasChem, Inc. for past, present and future violations by CasChem, Inc. of any New Jersey environmental statutes or regulations.

23. The NJDEP reserves the right to require CasChem, Inc. to take or arrange for the taking of any and all additional measures if the NJDEP determines that such actions are necessary to protect human health or the environment.

24. CasChem, Inc. admit that it has agreed to comply with the terms of this Remediation Agreement. Neither the entry into this Remediation Agreement nor the conduct of CasChem, Inc. hereunder, shall be construed as any admission of fact, fault or liability by the CasChem, Inc. under any applicable laws or regulations.

25. Except as otherwise set forth herein, by the execution of this Remediation Agreement, the NJDEP does not release any person from any liabilities or obligations such person may have pursuant to ISRA and the ISRA regulations, or any other applicable authority, nor does the NJDEP waive any of its rights or remedies pursuant thereto.

26. This Remediation Agreement shall not be constructed to affect or waive the claims of Federal or State natural resources trustees against any person for damages or injury to, destruction of, or loss of natural resources, unless expressly provided herein, and then only to the extent expressly provided herein.

#### VIII. Penalties

27. CasChem, Inc. agrees to pay penalties for its violations of this Remediation Agreement, or for its violations of a deed notice or declaration of environmental restriction that is part of a remedial action implemented pursuant to the Remediation Agreement, according to the amounts and conditions in this section.

28. CasChem, Inc. agrees:

a) That each violation of any requirement, condition or deadline in this Remediation Agreement constitutes an additional, separate, and distinct violation to which penalties apply;

b) That each day that a violation continues constitutes an additional, separate, and distinct violation to which penalties apply;

c) To pay interest, at the rate set forth in the New Jersey Court Rules, R. 4:42-11(a)i, on any unpaid penalty pursuant to this Remediation Agreement commencing on the first day after it has agreed to pay a penalty pursuant to this Remediation Agreement;

d) That nothing in this Remediation Agreement shall prevent the simultaneous accrual of separate penalties for separate violations of this Remediation Agreement;

e) That its payment of a penalty pursuant to this Remediation Agreement does not alter CasChem, Inc.'s responsibility to complete any requirement of this Remediation Agreement; and

f) To regard payments of penalties pursuant to this Remediation Agreement as payments of civil or civil administrative penalties pursuant to the Spill Compensation And Control Act, N.J.S.A. 58:10-23.11 through - 23.14.

29. CasChem, Inc. agrees to pay a penalty for all violations of this Remediation Agreement beginning on the first calendar day following the day the noncompliance begins and continually thereafter until the final day of correction of the noncompliance, in the following amounts:

Calendar Days After Due Date

Penalty



1 -- 7 days	\$ 500 per calendar day
8 -- 14 days	\$ 1,000 per calendar day
15 days and over	\$ 2,500 per calendar day

30. The Department will provide CasChem, Inc. with written notice of each violation, including a description of the conditions of this Remediation Agreement that CasChem, Inc. has violated, the date that CasChem, Inc. was to have completed each task, the duration of the violation, and the amount of the penalty that is due and owing pursuant to Paragraph 29, above.

31. CasChem, Inc. agrees to pay each penalty required by this Remediation Agreement by cashier's check or certified check payable to the "Treasurer, State of New Jersey," accompanied by DEP Form 062A and a letter referencing this Remediation Agreement and the violations for which CasChem, Inc. is submitting the payment within thirty (30) calendar days after its receipt of a penalty payment demand from the Department pursuant to Paragraph 30 above.

32. CasChem, Inc. agrees that nothing herein shall limit the Department's ability, upon CasChem, Inc.'s failure to pay a penalty pursuant to this Remediation Agreement, to pursue civil or civil administrative penalties or take any other enforcement action for any violations of this Remediation Agreement.

33. CasChem, Inc. agrees to pay a penalty in the amount of the economic benefit (in dollars) which CasChem, Inc. has realized as a result of not complying, or by delaying compliance, with the requirements of this Remediation Agreement, including the following:

- a) The amount of savings realized from avoided capital or noncapital costs resulting from the violation;
- b) The return earned or that may be earned on the amount of the avoided costs;
- c) All benefits accruing to the violator as a result of a competitive market advantage enjoyed by reason of the violation; and
- d) All other benefits resulting from the violation.

34. CasChem, Inc. agrees that the Department will consider the following factors in determining a penalty for economic benefit:

- a) The amount of capital investments required, and whether they are one-time or recurring;
- b) The amount of one-time non-depreciable expenditures;
- c) The amount of annual expenses;

- d) The useful life of capital;
- e) Applicable tax, inflation and discount rates;
- f) The amount of low interest financing, the low interest rate, and the corporate debt rate;  
and
- g) Any other factors relevant to economic benefit.

35. If the total economic benefit was derived from more than one violation, CasChem, Inc. agrees that the Department may apportion the total economic benefit amount among the violations from which it was derived so as to increase each civil administrative penalty assessment to an amount no greater than \$50,000 per violation.

#### IX. General Provisions

36. No modification or waiver of this Remediation Agreement shall be valid except by written amendment to this Remediation Agreement duly executed by CasChem, Inc. and the NJDEP. Any amendment to this Remediation Agreement shall be executed by the NJDEP and CasChem, Inc.. The NJDEP reserves the right to require the resolution of any outstanding violations of ISRA or this Remediation Agreement prior to executing any such amendment.

37. This Remediation Agreement shall be binding, jointly and severally, on each signatory, its successors, assignees and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity. No change in the ownership or corporate status of any signatory or of the industrial establishment or site shall alter signatory's responsibilities under this Remediation Agreement.

38. CasChem, Inc. agrees not to contest the authority or jurisdiction of the NJDEP to issue this Remediation Agreement; CasChem, Inc. further agrees not to contest the terms or conditions of this Remediation Agreement except as to interpretation or application of such specific terms and conditions that are being enforced in any action brought by the NJDEP to enforce the provisions of this Remediation Agreement.

39. CasChem, Inc. shall provide to the NJDEP written notice of the dissolution of its corporate or partnership identity, the liquidation of the majority of its assets or the closure, termination or transfer of operations at least five (5) calendar days prior to such action. CasChem, Inc. shall also provide written notice to the NJDEP of a filing of a petition for bankruptcy no later than five business days after such filing. These requirements shall be in addition to any other statutory requirements arising from the dissolution of corporate or partnership identity, the liquidation of the majority of assets, or the closure, termination or transfer of operations.

40. For persons executing this Remediation Agreement on behalf of a corporate entity, CasChem, Inc. shall submit to the NJDEP, along with the executed original Remediation Agreement, documentary evidence in the form of a corporate resolution, that the signatory has the authority to bind CasChem, Inc. to the terms of this Remediation Agreement.

41. CasChem, Inc. expressly agrees that in the event that CasChem, Inc. fails or refuses to perform any obligation(s) under this Remediation Agreement as determined by the NJDEP, the NJDEP shall have the right to exercise any option or combination of options available to the NJDEP under this Remediation Agreement, or any other statute.

42. Except as otherwise provided, the requirements of this Remediation Agreement shall be deemed satisfied upon the receipt by CasChem, Inc. of written notice from the NJDEP that CasChem, Inc. has demonstrated, to the satisfaction of the NJDEP, that CasChem, Inc. has completed the substantive and financial obligations imposed by this Remediation Agreement. Such written notice shall not relieve CasChem, Inc. from the obligation to conduct future investigation or remediation activities pursuant to federal, State or local laws for matters not addressed by this Remediation Agreement.

43. Compliance with the terms of this Remediation Agreement shall not excuse any Person(s) from obtaining and complying with any applicable federal, state or local permits, statutes, regulations and/or orders while carrying out the obligations imposed by ISRA through this Remediation Agreement. The execution of this Remediation Agreement shall not excuse any Person(s) from compliance with all other applicable environmental permits, statutes, regulations and/or orders and shall not preclude NJDEP from requiring that the Person(s) obtain and comply with any permits, and/or orders issued by NJDEP under the authority of the Water Pollution Control Act, N.J.S.A. 58:10A-1 *et seq.*, the Solid Waste Management Act, N.J.S.A. 13:1E-1 *et seq.*, and the Spill Compensation and Control Act N.J.S.A. 58:10-23.11 *et seq.*, for the matters covered herein. The terms and conditions of any such permit shall not be preempted by the terms and conditions of this Remediation Agreement if the terms and conditions of any such permit are more stringent than the terms and conditions of this Remediation Agreement. Should any of the measures to be taken by the Person(s) during the remediation of any ground water and surface water pollution result in a new or modified discharge as defined in the New Jersey Pollutant Discharge Elimination System ("NJPDES") regulations, N.J.A.C. 7:14A-1 *et seq.*, then the Person(s) shall obtain a NJPDES permit or permit modification from NJDEP prior to commencement of said activity.

October 7, 1982

136

Mr. Bruce Comfort  
Spill Response Unit  
N.J. State Department of  
Environmental Protection  
Office of Hazardous Substances Control  
Trenton, New Jersey 08620

Subject: Case #82-06-28-2

Dear Mr. Comfort:

In June of 1982, a routine sampling of our oil containment sump (see enclosed diagram) showed traces of Flex P-1 (Methyl Ricinoleate). A pressure test conducted on the nearby underground Flex P-1 line indicated that there was a leak in the line. An inventory check showed an unaccountable loss of approximately 20,000 pounds of Flex P-1. The result of our findings were reported as a spill to your department (case #82-06-28-2).

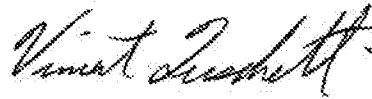
As a result of these findings seven core borings were taken at various locations in the yard on June 30th to determine the location and distribution of Flex P-1 underground in the yard. Four of the borings were driven to a depth of 8 feet and well points established (see enclosed diagram). The water table in the vicinity of the borings ranges from 5 to 7 feet below grade. Flex P-1 was found at well point 1 and 3, both located within one foot of the underground pipeline. Well point #3 showed only trace amounts of Flex P-1 and dried up when an attempt to pump it was made on July 6th. Well point #1 was pumped out on July 1st and 2nd, approximately 600 pounds of material was removed consisting mainly of Flex P-1. On July 6th 300 pounds of material was pumped out of well point #1 consisting mainly of water. At this date well point #1 dried up. On July 19th a 5 x 5 x 9 foot sump was dug at the location of well point #1 in an attempt to increase the effectiveness of the removal of Flex P-1. The sump was pumped out on a daily basis for a period of three weeks during which time approximately 150 pounds of Flex P-1 was recovered. At the end of this time it appeared that no more Flex P-1 was being carried into the sump.

Continued on Page Two

BAK000048

On September 23rd an 8 inch diameter permanent well was installed in the sump dug at well point #1. The area was back filled with 2-1/2 inch stone. This well point will be used for continued sampling for the presense of Flex P-1 on a monthly basis until September of 1983. When sampling indicates the presense of Flex P-1 this sump will be pumped out to remove the Flex P-1 present in the vicinity of the sump. The Flex P-1 underground line has been permanently disconnected, as have the other underground P-lines that were situated near it. These lines now cross the yard by way of an overhead pipe bridge.

Yours truly,



V. Fuschetti  
Process Engineer

e1

Enclosure

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION**MEMO**

TO Spill File  
 FROM Bruce Comfort *BC* DATE July 1, 1982  
 SUBJECT CasChem 35 Ave A Bayonne DWM #82-6-28-3 2

Purpose of Visit: Investigation of a reported discovery of a castor oil derivative in a well on the subject Company's property. 138

Visit Date: 6/30/82

Report Date: 6/30/82

1330 - Arrived at subject Company. Spoke to Mr. Douglas Deatruck, Process Engineer about the problem. He said that on the past Friday, a Company product Methyl Ricinolate, tradename "Flexricin P-1" was found in a sump pit on the property. The sump was a recovery point for a fuel oil tank leak which had occurred some time ago. When discovered an inventory check revealed a discrepancy of 20,000 lbs. of the product. An U/G pipe which was quite old (1938-40) was thought to be leaking. The pipe has been by passed and rerouted over head.

The figure of 20K lbs. translates to about 2600 gal. of the material. Material has a Specific Gravity of 0.925 or 7.72 lbs/gal, Flash Point of 230 °F.

We inspected the site. It is in an open yard area of the plant with a concrete slab. Area is bounded by buildings on two sides. The third side, closest to the Bay, is said to have a 9 foot deep Bentonite wall used to contain the fuel oil leak. The sump pit is said to be 9 feet deep with tidal water which varies from 5 to 7 feet. On this date a small amount of product (Flexricin) could be seen on the water. The sump is outfitted with a skimmer only. No depression pump is utilized.

Mr. Deatruck said that the Company had hired Jersey Boring and Drilling to install six wells on site. Three on either side of the wall. I asked that he call me when the wells are installed.

1415 - I secured.

BC:elw

BAK000 049

### **CasChem Fined For Storage Practices**

163 words

1 December 1994

Waste Treatment Technology News

Vol. 10, No. 3 ISSN: 0885-0003

English

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**CasChem** (40-A Ave., Bayonne, NJ 07002; Tel: 201/858-7900), a subsidiary of Cambrex Corp. (One Meadowlands Plaza, East Rutherford, NJ 07073; Tel: 201/804-3000), has agreed to pay \$1 million to settle charges of illegal storage of hazardous wastes, filed in 1990. The company, and its former regulatory affairs manager, Stuart Cooper, pleaded guilty to storing 10 drums of hazardous waste in a Newark Bay pier warehouse without a permit.

**CasChem** could have been fined up to \$50,000 a day for the felony act. Cooper admitted he failed to report the illegal storage to the **EPA**, a misdemeanor. He faces up to one year in prison and a \$100,000 fine. **CasChem** says it settled to avoid large legal fees and management distractions from business operations. The warehouse was in Bayonne, but was not at CasChem's plant. It was rented from Texaco, and **CasChem** did not have a permit to store hazardous waste there.

Document winw000020011030dqf1000bb

Passaic Valley  
Sewerage Commissioners

600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951

September 15, 1992

CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

ROBERT J. DAVENPORT  
DEPUTY EXECUTIVE DIRECTOR

GABRIEL M. AMBROSIO  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

Mary Jo Aiello  
Pretreatment & Residuals  
401 East State Street  
Floor 4 East  
CN-029  
Trenton, New Jersey 08625-0029

CERTIFIED RECEIPT  
P 093 842 606

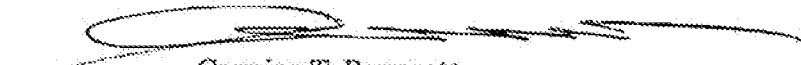
**RE: PRETREATMENT PROGRAM ANNUAL REPORT NUMBER 9**

Dear Ms. Aiello:

Enclosed are two copies of the ninth annual report submitted by Passaic Valley Sewerage Commissioners to your agency. This report covers the one year period from August 1, 1991 through July 31, 1992. As in the past, we will be available to meet with your staff to answer questions or discuss continued efforts to improve our pretreatment program.

Very truly yours,

Passaic Valley Sewerage Commissioners

  
Carmine T. Perrapato  
Executive Director

CTP/sml

Enclosure

cc: Robert J. Davenport, Deputy Executive Director  
Frank P. D'Ascensio  
Richard Baker, USEPA

*Handwritten notes and stamps:*  
- "Approved" stamp  
- "KLL" stamp  
- "KLL025396" stamp  
- "TIERRA-B-016460" stamp

KLL025396

TIERRA-B-016460



**INDUSTRIAL PRETREATMENT PROGRAM ANNUAL REPORT**

---

---

Control Authority: PASSAIC VALLEY SEWERAGE COMMISSIONERS

Report Date: September 15, 1992

Period Covered by this Report: From 8/1/91 to 7/31/92

Period Covered by Previous Report: From 8/1/90 to 7/31/91

Wastewater Treatment Plant(s)

NJPDES Permit Number

PVSC - NEWARK

0021016

Person to contact concerning information in this report:

Name: Frank P. D'Ascensio  
Title: Manager of Industrial & Pollution Control  
Mailing Address: 600 Wilson Avenue  
Newark, NJ 07105

Telephone No: (201)817-5710

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sept 15, 1992  
Date

[Signature]  
Signature of Official

Executive Director  
Title

KLL025397

FORM AR-1

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	OCPSF	414 32
	Inorganic Chemicals	415 37
	Iron & Steel	420 38
	Non-Ferrous Steel	421 39
	Steam Electric	423 40
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KLL025399

### Appendicies

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B.	III	New pH Guidelines
C.	V	List of Significant Violators
D.	V	OCPSF Status on Compliance (to DEPE)
E.	V	OCPSF Compliance Determination (to EPA)
F.	VI	Procedure for Reporting Analytical Results
G.	VI	Sampling Schematic Transmittal Letter
H.	VI	Procedure for Handling Reporting Deficiencies
I.	VII	Thank you Letter From Division of Criminal Justice
J.	VII	Calculating Compliance With 4 Day Average Limitation (40 CFR 413)

RULG2E3P0

COMPANIES ADDED SINCE LAST REPORT		POTW: PVSC
FACILITY NAME	LOCATION ADDRESS	BRIEF DESCRIPTION
Amoco Oil Company Station #357	West 7th Street & JFK Bayonne, NJ 07002	Pretreated Groundwater
Atwell Inc.	4 Taft Road Totowa, NJ 07512	Metal Finisher
Aurora Color Corporation	101 East 24th Street Paterson, NJ 07514	Textile Dyeing
Cap City Products Company Inc.	125 Sanford Avenue Kearny, NJ 07032	Detergent Mfg.
Cas Chem Inc.	40 Avenue A Bayonne, NJ 07002	Organic Chemical Mfg.
Chelsea Caterings Corporation Inc.	330 Newark International Airport Newark, NJ 07114	Airline Caterer
Chemical Compounds Inc.	29-75 Riverside Avenue Newark, NJ 07104	Organic Chemical Mfg.
Chemical Corporation Of America	2 Carlton Avenue East Rutherford, NJ 07073	Organic Chemical Mfg.
Duke's Auto Wreckers	99 Dell Glen Avenue Lodi, NJ 07644	Auto Recycler
Dye Specialties, Inc.	407 Ege Avenue Jersey City, NJ 07304	Organic Chemical Mfg.
E & W Textile Processors, Inc.	900 Passaic Avenue East Newark, NJ 07029	Textile Dyeing
Electron Technology Inc. Division Frederics Company	626 Schuyler Avenue Kearny, NJ 07032	Electroplater

K1102541E

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INDUSTRIAL INVENTORY : CATEGORICAL IU's 40 CFR 414 POTW: PVSC			
FACILITY NAME	FACILITY STREET ADDRESS	BUSINESS ACTIVITY and SIC CODE	AVERAGE DAILY FLOW (MGD)
Adco Chemical Company	49 Rutherford Street Newark, NJ 07105	2899 Organic Chemical Mfg.	0.005
Alliance Chemical, Inc.	33 Avenue P Newark, NJ 07105	2816 Organic Chemical Mfg.	0.022
Ardmore Chemical Company	29 Riverside Avenue Bldg. #14 Newark, NJ 07104	2869 Organic Chemical Mfg.	0.054
Belzak Corporation	850 Bloomfield Avenue Clifton, NJ 07012	2865 Sodium Glucoheptonate	0.017
Cardolite, Inc.	500 Doremus Avenue Newark, NJ 07105	2892 Capscales, Liquid & Solid Friction Resins	0.020
CasChem Inc.	40 Avenue A Bayonne, NJ 07002	2869 Organic Chemical Mfg.	0.101
Chemical Compounds, Inc.	29-75 Riverside Avenue Bldg. #17 Newark, NJ 07104	2865 Organic Chemical Mfg.	0.001
Chemical Corporation of America	2 Carlton Avenue East Rutherford, NJ 07073	2865 Organic Chemical Mfg.	0.038

KLL025470

32

FORM AR-2a

**APPENDIX (C)**

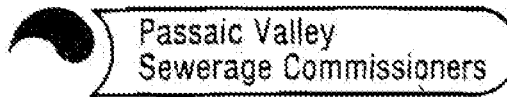
**SECTION (V)**

KLL02550°

DONALD TUCKER  
CHAIRMAN

RAYMOND LUCHKO  
VICE CHAIRMAN

ROBERT M. BURKE, JR.  
THOMAS J. CIFELLI  
DOMINIC W. CUCCINELLO  
DONALD W. GIACONIA  
JAMES KRONE  
FRANK DRECHIG  
COMMISSIONERS



600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951

CARMINE T. FERRAPATO  
EXECUTIVE DIRECTOR  
ROBERT J. DAVENPORT  
DEPUTY EXECUTIVE DIRECTOR  
GABRIEL M. AMBROSIO  
CHIEF COUNSEL  
LOUIS LANZILLO  
CLERK

October 25, 1991

Mr. P. Polios  
Bureau of Pretreatment Residuals  
NJDEP-DWR  
CN-029  
Trenton, New Jersey 08625.

**RE: OCPSF STATUS**

Dear Mr. Polios:

Enclosed is a status report on OCPSF compliance. Of the 48 companies in the category, 38 companies appear to be in compliance. Ten companies have reported non compliance for a number of reasons, including possible laboratory errors/contamination and interference/matrix effects. However, we are still unable to determine exact compliance status because we still have not received guidance from EPA on the application of mass limits and how to deal with interferences and matrix effects. Therefore, while the reported non compliance has been addressed both verbally and in writing, no enforcement action has been taken.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

  
Frank P. D'Ascensio  
Manager of Industrial & Pollution Control

FPD/mc

cc: Carmine T. Ferrapato, Executive Director  
Robert Davenport, Deputy Executive Director

KLL025517

VAJG:DRG  
:DCPSF

DCPSF COMPANIES COMPLIANCE STATUS 10/21/91

COMPANY	INSP.	COMPLIANCE	NON COMPLIANCE
ADCO CHEMICAL	AR	YES	
ALLIANCE CHEMICAL	RG	NO	ZINC IN AUG.
ARDMORE CHEMICAL	JG	YES	
BASF	AR	YES	
BELZAK	LL	YES	
CARDOLITE	RG	YES	
CASCHEM	AR	NO	1,1 DICHLOROETHANE
COMMERCIAL PRODUCTS	BW	YES	
COOKSON	BW	YES	
CROMPTON&KNOWLES NUT	MG	NO	METHYLENE CHLORIDE
CROMPTON&KNOWLES NWK	JG	YES	
DAI-COLOR POPE	BW	YES	
DYE SPECIALTIES	RG	YES	
ELAN CHEMICAL	MG	NO	TOLUENE, CHLOROBENZENE, ZINC
FABRICOLOR	JG	YES	
FAIRMONT CHEMICAL	MG	NO	ZINC AND LEAD IN AUG
FIRMINECH	BW	YES	
GALAXIE CHEMICAL	RG	YES	
GIVAUDAN	BW	NO	TOLUENE & METHYLENE CHLORIDE
H & S CHEMICAL	MG	YES	
HENKEL	AR	YES	
HETERENE CHEMICAL	JG	YES	
HILTON DAVIS	BW	YES	
HOECHST DELANESE	JG	YES	
HUMKO	JG	YES	
ICI AMERICA	RG	NO	CYANIDE IN AUG.
KALAMA CHEMICAL	JG	YES	
KARLSHAMNS	JG	YES	
LIFO CHEMICAL	MG	NO	LEAD AND METHYLENE CHLORIDE
MAGRUDER COLOR	AR	YES	
KATHE CO.	MG	YES	
MI HOLDING (MALINKRO)	MG	YES	
MOBAY CHEMICAL	AR	YES	
MONSANTO	RG	YES	
MORTON CHEMICAL	LL	YES	
NAFF CHEMICAL	AR	YES	
ORIENT CHEMICAL	BW	YES	
PASSAIC COLOR	MG	YES	
PENCO	BW	YES	
POLAROME	LL	YES	
REICHOLO (DEL)	LL	YES	
REICHOLO (SK)	LL	NO	ZINC IN AUG.
ROSE COLOR	LL	YES	
SANDOZ	LL	NO	LEAD IN AUG.

KLL025519



SCHEP CHEMICAL	LL	YES
SIN CHEMICAL	LL	YES
TRICOP	LL	YES
VAN DYK	RO	YES

KLL025510



# Enforcement & Compliance History Online (ECHO)

You are here: [EPA Home](#) [Compliance and Enforcement](#) [ECHO](#) [Search Data](#) [Search Results](#)

## Enforcement Case Report

[Report a General Error](#) [Data Dictionary](#)

For Public Release - Unrestricted Dissemination. Report Generated on 02/18/10  
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

[Data Dictionary](#)

Case Number:	02-2004-3813	Result of Voluntary Disclosure?	No
Case Name:	CasChem Inc.	Multi-media Case?	No
Case Type:	Administrative - Formal	Enforcement Type:	CWA 311B6B2 AO For Class II Penalty
Case Status:	Closed	Violations:	Failure To Have Adequate SPCC Plan
Regional Docket Number:	CWA-02-2004-3813	Enforcement Outcome:	Final Order With Penalty
Relief Sought:	No Data		

### Penalties:

\*EPA settles the vast majority of its enforcement actions and almost all of these cases are settled without an admission of liability. The agreement to pay a penalty as part of a settlement does not necessarily reflect an admission of liability for environmental violations by the company.

Total Federal Penalty* Assessed or Agreed To (not necessarily an admission of liability)	Total State/Local Penalty Assessed	Total SEP Cost	Total Compliance Action Cost	Total Cost Recovery
\$60,000			\$12,000	

### Case Summary:

[Data Dictionary](#)

Failure to prepare and implement an SPCC plan.

[Data Dictionary](#)

### Laws and Sections:

Law	Sections	Programs
CWA	311J	SPCC

### Citations:

Title	Part	Section
No Data Records Returned		

### Program Links:

FRS Number	Program	Program ID
110000317844	ICIS	6683053

### Facilities:

[Data Dictionary](#)

FRS Number	Facility Name	Address	City Name	State	Zip	SIC Codes	NAIC Codes
110000317844	CASCHEM INCORPORATED	40 AVENUE A	BAYONNE	NJ	07002		

### Defendants:

[Data Dictionary](#)

Defendant Name	Named in Complaint	Named in Settlement
CasChem Inc.	Y	Y

### Case Milestones:

Data Dictionary

Event	Actual Date
Complaint/Proposed Order	09/28/2004
Final Order Issued	01/13/2006
Enforcement Action Closed	01/13/2006

### Pollutants:

Data Dictionary

Pollutant Name	Chemical Abstract Number
Petroleum waste	

Data Dictionary

### Enforcement Conclusion

1

Enforcement Conclusion Type: Administrative Penalty Order With or Without Injunctive Relief  
 Enforcement Conclusion Name: CasChem Inc.  
 Facilities in Settlement (FRS ID): 110000317844  
 Settlement Entered Date: 01/13/2006  
 Settlement Lodged Date: 09/28/2004

### Enforcement Conclusion Dollar Amounts:

Federal Penalty Assessed or Agreed To	State/Local Penalty Assessed	SEP Cost	Compliance Action Cost	Cost Recovery
\$60,000			\$12,000	

### Pollutant Reductions:

Pollutant	Annual Amount	Units	Media	SEP or Comp
OIL	3,900,000	gal	SWT	C

### Improvements in Reporting:

Pollutant	Average Annual Value	Units	Media
No Data Records Returned			

### Complying Actions:

Complying Action Type	Text Description
Develop Spill Prevention Plan	NA

### Supplemental Environmental Projects:

Categories	Description
No Data Records Returned	

[Click here](#), for a Detailed Facility Information.

This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: ICIS: 01/15/2010

Version 12/03/08



**Inspection Summary Report for VERTELLUS  
 PERFORMANCE MATERIALS INC - Activity Number  
 SCI 050001**

Feb 18, 2010 09:05

**NOTE:** The information contained in this report will be limited to the date each program began using the Department's integrated database, NJEMS. The programs began using the system for this information as follows: Air - 10/1998; Hazardous Waste - 1/2000; Water Quality - 7/2000; Water Supply (limited information for Safe Drinking Water and Water Allocation) - 7/2000; Lab Certification (limited information) - 7/2000; TCPA - 12/2001; Land Use 12/2001; DPCC - 1/2002; Solid Waste - 1/2002; Right To Know - 3/2002 and Pesticides - 4/2002; Site Remediation - 3/2003 and Radiation (limited information) - 7/2006. For complete information prior to these dates, please submit an official OPRA request form to the Department. If printing this report, select landscape orientation. For a list of terms and definitions, click on the following link:  
<http://www.state.nj.us/dep/infview/enforcement.html>

**Disclaimer:** Only final inspection reports are listed in this report. Inspections for which a report has not been finalized by the Department will not appear in this report. Also, inspections which yield violations but where the inspected entity has not yet been notified of the violation are not listed in this report. For inspections indicating Out of Compliance, this means that violations were observed during the inspection, based on facts and information known to the Department at the time of the inspection. Errors or omissions in the factual basis for any violation may result in a future change in classification as a violation when such information becomes known.

Activity Number: **SCI 050001**      Inspection Type: **\*Standard Compliance Inspection**      Program Interest ID: **46187**

Inspection Start Date: **07/20/05**      End Date: **07/20/05**      Lead Investigator: **Zuckerman, Marc**

Program Interest Name: **VERTELLUS PERFORMANCE MATERIALS INC**

Address: **40 AVENUE A**      Bayonne      NJ      07002      County: **Hudson - Bayonne City**

Block:      Lot:

Comments:

NJPDES Permit No.: NJ0000949, P.I. No.: 46187. Effective Date of Permit: 07/01/2003, Expiration Date: 6/30/2008. NJPDES Permit No.: NJ 0131423 Effective Date of Permit: 06/01/2002, Expiration Date: 05/31/2007. There have been no discharges of non-contact cooling water since a time prior to the last inspection. The facility has installed a closed chiller system that recycles non-contact cooling water and has ceased discharging bay water in their cooling process. The company is in the process of preparing to submit a request to terminate their Surface Water Permit. A field NOV was issued for the exposure of multiple drums to stormwater.

Subject Name: **5G2      0 - Basic Industrial Stormwater GP - NJ0088315 (5G2)**

Requirement Description	Compliance Status	Compliance Comments	Grace Days	Non Minor Reason	Requirement Source
Did the permittee amend its SPPP to reflect changes at the facility and/or discharges to ground water?. [N.J.A.C. 7:14A- 2(11)c]	In Compliance	Yes.			DST 020001
Did the permittee conduct and document annual inspections of the facility as required by the permit?. [N.J.A.C. 7:14A- 2(11)c]	In Compliance	Yes.			DST 020001
Did the permittee develop an SPPP that demonstrates, once it has been implemented, that there will be no exposure, during and after storm events, of source materials to stormwater as required by the permit?. [N.J.A.C. 7:14A- 2(11)c]	In Compliance	Yes.			DST 020001
Did the permittee have any discharges not authorized by the permit?. [N.J.A.C. 7:14A- 2(4)b]	In Compliance	No.			DST 020001
Did the permittee make the SPPP available for review?. [N.J.A.C. 7:14A- 2(11)c]	In Compliance				DST 020001

Did the permittee prepare an SPPP as required by the permit?. [N.J.A.C. 7:14A- 2(11)c]	In Compliance	Yes.			DST 020001
Does the facility maintain at least 5 years of Attachment D recertifications?. [N.J.A.C. 7:14A- 6.6]	In Compliance	Yes.			DST 020001
Does the SPPP include a categorical list of all source materials located at the facility?. [N.J.A.C. 7:14A- 6(2) a1]	In Compliance	Yes.			DST 020001
Does the SPPP include a complete narrative description concerning the management of all source materials at the facility as required by the permit?. [N.J.A.C. 7:14A- 6(2) a1]	In Compliance	Yes.			DST 020001
Does the SPPP include a list of any final or draft NJPDES permits, pending NJPDES permit applications, or pending requests for authorization under another general NJPDES permit?. [N.J.A.C. 7:14A- 6(2)a1]	In Compliance	Yes.			DST 020001
Does the SPPP include a list of the facility's non-stormwater discharges to surface or ground water?. [N.J.A.C. 7:14A- 6(2)a1]	Heading	Yes.			DST 020001
Does the SPPP include a map developed as required by the permit?. [N.J.A.C. 7:14A- 6(2)a1]	In Compliance	Yes.			DST 020001
Does the SPPP include a schedule for full implementation of best management practices by the applicable deadlines specified in the permit?. [N.J.A.C. 7:14A- 6(2)a1]	In Compliance	Yes.			DST 020001
Does the SPPP include a schedule for providing regular and appropriate maintenance and repairs of all structural best management practices?. [N.J.A.C. 7:14A- 6(2)a1]	In Compliance	Yes.			DST 020001
Does the SPPP include a schedule for regular inspection by facility personnel of designated areas, operations, and equipment, inclusive of an annual inspection of the entire facility, as required by the permit? . [N.J.A.C. 7:14A- 6 (2)a1]	In Compliance	Yes.			DST 020001
Does the SPPP include best management practices which will ensure no exposure of source materials to stormwater? . [N.J.A.C. 7:14A- 6(2)a1]	In Compliance	Yes.			DST 020001
Does the SPPP record any incidents such as leaks or accidental discharges, and any failures or breakdowns of structural BMPs and ensure that, in such instances, corrective measures are implemented and inspected, and full remediation is achieved?. [N.J.A.C. 7:14A- 6(2)a1]	In Compliance	Yes.			DST 020001
Has the Attachment D due date changed from the last permit? If so, what is the new due date?. [N.J.A.C. 7:14A- 2(11)c]	Data Collection	Attachment D recertification is due anytime between April 1, and June 30, every year that the permit is in effect.			DST 020001
If the facility has a SPCC, DPCC, and/or DCR Plan, does the SPPP include, or cite the location of, said plans?. [N.J.A.C. 7:14A- 6(2)a1]	Not Applicable				DST 020001
If the facility is undergoing any construction activities, has the SPPP been amended to reflect such construction as required by the permit? . [N.J.A.C. 7:14A- 6(2)a1]	In Compliance	No construction.			DST 020001
RECORDKEEPING.	Heading				DST 020001
STORMWATER POLLUTION PREVENTION PLAN. [N.J.A.C. 7:14A- 6(2)a1]	Heading				DST 020001
When did the permittee submit Attachment C to the Department?.	In Compliance	12/23/97.			DST 020001

Subject **B** 0 - Industrial Wastewater  
 Rem:

Requirement Description	Compliance Status	Compliance Comments	Grace Days	Non Minor Reason	Requirement Source
Did the highest ranking official having day-to-day managerial and operational responsibilities for the discharging facility sign the monitoring reports?. [N.J.A.C. 7:14A- 6.9(a)]	In Compliance	Yes.			DSW 020001
Did the permittee complete monitoring reports in accordance with the current Discharge Monitoring Report	In Compliance	Yes.			DSW 020001

Manual and any updates?. [N.J.A.C. 7:14A- 6.2(a)1]					
Did the permittee discharge only at the authorized location(s)? . [N.J.A.C. 7:14A-13.16(a)1]	Not Applicable	See above.			DSW 020001
DISCHARGE REQUIREMENTS.	Sub-Heading				DSW 020001
Does the permittee appropriately retain monitoring records? . [N.J.A.C. 7:14A- 6.6(a)]	In Compliance	Yes.			DSW 020001
Does the permittee retain copies of all reports required by a NJPDES permit and records of all data used to complete the application for a NJPDES permit for a period of at least 5 years? . [N.J.A.C. 7:14A- 6.6(a)]	In Compliance	Yes.			DSW 020001
Flow shall be measured using a flow meter. [N.J.A.C. 7:14A- 6.2(a)1]	Not Applicable	See above.			DSW 020001
MONITORING REQUIREMENTS	Heading				DSW 020001
RECORDKEEPING	Heading				DSW 020001
REPORTING	Heading				DSW 020001
Was all monitoring conducted in accordance with Part III of the Permit?. [N.J.A.C. 7:14A- 6.5(b)]	Not Applicable	See above.			DSW 020001
Was sampling conducted in accordance with the Field Sampling Procedures Manual or other Department approved method?. [N.J.A.C. 7:14A- 6.5(b)4]	Not Applicable	See above.			DSW 020001
Was there a discharge of or evidence of foam, objectional color or odor, and/or visable sheen in the receiving stream?. [N.J.A.C. 7:14A-12.6(a)]	In Compliance	None at the time of the inspection.			DSW 020001
Were all analyses performed by a New Jersey Certified Laboratory? Indicate lab name(s). [N.J.A.C. 7:14A- 6.5 (a)2]	Not Applicable	Permittee ceased discharging.			DSW 020001
Were analyses of wastewater performed in accordance with the appropriate analytical test procedures? . [N.J.A.C. 7:14A- 6.5(a)2]	Not Applicable	See above.			DSW 020001
Were WCR samples collected at the same time as the Whole Effluent Toxicity samples?. [N.J.A.C. 7:14A- 6.2 (a)1]	Not Applicable	See above.			DSW 020001

Subject: WCP6 0 - Water - Comply with Permit  
Item:

Requirement Description	Compliance Status	Compliance Comments	Grace Days	Non Minor Reason	Requirement Source
Did the permittee comply with the conditions of the NJPDES permit?. [N.J.A.C. 7:14A- 6.2(a)1]	Out of Compliance	Failure to comply with the conditions of the NJPDES permit: Exposure of source material (Drums) to stormwater. Field NOV issued.			Rules

Subject: WCP7 0 - Water - Comply with Permit  
Item:

Requirement Description	Compliance Status	Compliance Comments	Grace Days	Non Minor Reason	Requirement Source
Did the permittee comply with the conditions of the NJPDES permit?. [N.J.A.C. 7:14A- 6.2(a)1]	Out of Compliance, Non-referred	Failure to submit Attachment D Recertification by 06/30/2005.			Rules

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