04-14-03

NJDEP INSPECTION FORM

SDMS Document
126049

Report Prepared for:

Generator [X]

Transporter [ ]

HWM (TSD) facility [X] - REQUESTED STATUS CHANGE WITH USEPA AND NJDEP.

Facility Information

Name: (HARSHAW CHEMICAL COMPANY) Anspec Chemical Corp.

Address: Foot of Water Street
Gloucester City, N.J.

UNDER THE NAME KEWALNEE OIL COMPANY - A DIVISION OF HARSHAW CHEM. CORP.

Lot: 2, 8, 9, 16, 14, 7, 7a, part 17 Block: 110

County: Camden

Phone: 609-456-3930

EPA ID#: NJD000312371

Date of Inspection: 4-13-83

Participating Personnel

State or EPA personnel: Albert Fenlinger

Facility personnel: John Gustavsen
Kevin Stewart

Report Prepared by Name: Albert Fenlinger

Region: Region I - Red Lion

Telephone #: 609-859-2958

Reviewed by: David Potts

Date of Review: 6/20/83 (mail sample results) 6/8/83

Attachment - A

Mansfield Chemical Corp

FACILITY NAME: Mansfec Chemical Corp

ADDRESS: Foot of Water St

Gloucester City, NJ

COUNTY: Camden

EPA ID #: NJD002183371

DATE OF INSPECTION: 4-13-83

PHOTOS TAKEN [ ] YES [X] NO

If yes, how many? zero

SAMPLES TAKEN [X] YES [ ] NO NUMBER OF SAMPLES 3

NJDEP ID # AF41383A, AF41383B and AF41383C

MANIFESTS REVIEWED [X] YES [ ] NO

Number of manifests in compliance —

Number of manifests not in compliance one (see attached)

List manifest document numbers of those manifests not in compliance.

(NJ# 014633)

Describe the activities that result in the generation of hazardous waste.

WASTE GENERATION ON SITE IS OF A PERIODIC NATURE, IN THAT THEY MANUFACTURE A PRODUCT IT IS DONE ON A DEMAND BASIS (ACTIVITY) WASTE IS GENERATED FROM LAB WASTES AND CARBON FILTER MATERIAL THAT IS USED TO FILTER THE PRODUCT SODIUM METHYLATE. ALSO NaOH SOLUTION USED IN A PRODUCTION PROCESS WITH CORROSIVE WASTE GENERATED.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

NO WASTE IN STORAGE ON SITE. WASTE TYPES POSSIBLY GENERATED, WASTE ALCOHOLS AND SODIUM METHYLATE SOLVENTS, WASTE PROPARGYL ALCOHOL, NaOH CAUSTIC SOLUTION AND WASTE OILS. THE FACILITY HAS ALSO SENT VARIOUS WASTE TYPES OFF SITE IN THE PAST YEAR DUE TO VARIOUS MATERIALS STORED ON SITE FOR A LONG PERIOD OF TIME. IE TARS, OIL RESIDUES. ALSO WASTE CHROMIUM WASTE LIQUOR FROM ACETYLACETONATE PRODUCTION FILTERING PROCESS ON SITE.

Summary of Findings

Facility Description and Operations

Amspec Chemical Corp. previously Harshaw Chemical Company, makes various chemicals of a metallic organic compound nature that are applied on glass for color. The bulk of waste generated is from the acetylacetonate process.

The inspection showed violations of lack of personnel training and possible illegal storage. Several drums of sludge like material were found in a pull-off with liquid leaking from the pull-off. The operator on site stated the sludge was from the filtering process that is sometimes nitrated. Based on pH, there was also a drum of oil contaminated cardboard and paper-like material. 3 samples were taken from the pull-off. (Analytical results are pending the sample results) One additional violation was found by the failure to complete a manifest. (SEE ATTACHED)

GENERATOR INSPECTION CHECKLIST

		YES	NO	N/A
7:26-8.5	Hazardous waste determination			
	(a) Did the generator test its waste to determine whether it is hazardous?		✓	
	Is the waste hazardous?	✓		
	Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	✓		
	Has hazardous waste been shipped off site since November 19, 1980?	✓		
	If yes, how many shipments, off site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. Facility used to use 500 gallon holding tank for waste - a supernant mother liquor in the manufacturing of electronic chemicals.			
7:26-7.4(a)1	Does the generator have an EPA ID #?	✓		
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient) NJ0146333		✓	
7:26-7.4(a)4i	The generator's name, address and phone number?	✓		
7:26-7.4(a)4ii	The generator's EPA ID number?	✓		
7:26-7.4(a)4iii	The transporter(s) name, address and phone number?	✓		
7:26-7.4(a)4iv	The transporter(s) EPA ID number?	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility?	✓		
7:26-7.4(a)4vi	The TSDF's EPA ID number?	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		

		YES	NO	N/A
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by the generator?	✓		
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:			
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓		
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓		
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓		
7:26-7.4(a)5iv	Give remaining copies of the manifest form to the transporter?	✓		
7:26-7.4(f)1	Has the generator maintained facility records since November 19, 1980? (Manifest(s), exception report(s) and waste analysis)	✓		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓		
7:26-7.4(h)2	If not,			
	1. Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at 609-292-9877 to inform the NJDEP of the situation, and			✓
	2. Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?			✓
	Before transporting or offering hazardous waste for transportation off site, does the generator?			
7:26-7.2(a)	Conspicuously lable appropriate manifest numbers on all hazardous waste containers that are intended for shipment?			✓
7:26-7.2(b)	Insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations (i.e., 49 CFR 171 - 49 CFR 179)?			✓

No waste containers present to inspect

		YES	NO	N/A
7:26-9.3	Accumulation time			
	How is waste accumulated on site?			
	[X] Containers — 15 containers present			
	[ ] Tanks (complete HWMF checklist)			
	[ ] Aboveground [ ] Below ground			
	[ ] Surface impoundments (complete HWMF checklist			
	[ ] Piles (complete HWMF checklist)			
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?			✓
	Is waste accumulated for more than 90 days?		✓	
	If yes, complete HWMF checklist.			

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSD) CHECKLIST IS FILLED OUT.

SHORT TERM ACCUMULATION STANDARDS (FOR GENERATORS WHO ACCUMULATE WASTE IN CONTAINERS FOR 90 DAYS OR LESS)

		YES	NO	N/A
7:26-9.4	Containers			
	What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty five gallon drums of waste acetone). 55 gallon DRUMS - NOW USED INSTEAD OF THE BULK STORAGE TANK ON SITE.			
7:26-9.4(d)3	Do the containers appear to be in good condition, not in danger of leaking?			✓
	If no, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)4i	Are all containers securely closed except those in use?			✓
7:26-9.4(d)4iii	Do containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing or leaking?			✓
7:26-9.4(d)4iv	Are containerized hazardous waste segregated in storage by waste type?			✓
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?			✓
7:26-9.4(d)5	Is the storage area inspected at least daily?			✓
7:26-9.4(d)6	Are containers holding ignitible and reactive wastes located at least 50 feet (15 meters) from the facility's property line?			✓
7:26-11.2	Tanks			
	What are the approximate number and size of tanks containing hazardous waste?	ONE 5000 gallon		storage
	Identify the waste treated/stored in each tank.	TANK NO LONGER USED.		

N/A NO USE OF TANK ON SITE

		YES	NO	N/A
	General Operating Requirements			
7:26-11.2(a)2	Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?			✓
	If no, please explain.			
	Are there leaking tanks?			✓
7:26-11.2(a)2	Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?			✓
7:26-11.2(3)	Do uncovered tanks have at least 2 feet of freebo d or an adequate containment structure?			✓
7:26-11.2(a)4	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?			✓
7:26-11.2(c)	Inspections			
	Is the tank(s) inspected each operating day for:			
	1. Discharge control equipment			✓
	2. Monitoring equipment			✓
	3. Level of waste in tank			✓
	4. Construction of materials of the tank			✓
	5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?			✓
	Are there underground tanks?			✓
	If yes, how many and can they be entered for inspection?			✓
7?26-11.2(e)	Are ignitible or reactive wastes stored in a manner which protects them from a source of ignition or reaction?			✓
	If no, please explain.			

		YES	NO	N/A
7:26-11.2(f)	Does it appear that incompatible wastes are being stored separate from each other?			✓
7:26-9.4(g)	Personnel training			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed? STATES EMPLOYEES TOLD WHAT TO DO WITH SUPERVISION OF PRESIDENT	✓		
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?	✓		
7:26-9.4(g)5	If yes, have facility personnel taken part in an annual review of training? EVERY TIME A WASTE LOAD GOES OUT	✓		
	Is there written documentation of the following: THEY CONSIDER IT INFORMAL TRAINING		✓	
7:26-9.4(g)6i.	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?		✓	
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?		✓	
7:26-9.4(g)6iii	A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?		✓	
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?		✓	
7:26-9.4(g)7	Are training records kept on all employees for at least 3 years?		✓	
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?	✓		NOT LOCAL AUTHORITY BUT IN HOUSE FIRE FIGHTING UNIT THAT RUNS DRILLS
7:26-9.6	Preparedness and prevention			
	Does the facility comply with preparedness and prevention requirements including maintaining:			

		YES	NO	N/A
7:26-9.6(b)1	An internal communications or alarm system?	✓		
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?		✓	
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	✓		
7:26-9.6(c)	Is equipment tested and maintained?	✓		
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?			✓

If no, please explain.

NO WASTE ON SITE AT TIME OF INSPECTION.

	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	✓		

Explain.

7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site:	✓		
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	✓		
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	✓		

		YES	NO	N/A
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?	✓		
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	✓		
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	✓		
7:26-9.7	Contingency plan and emergency procedures			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	✓		
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	✓		
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	✓		
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 *et seq.*?	✓		
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	✓		
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	✓		

		YES	NO	N/A
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.	✓		
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?	✓		
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evaucation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evaucation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?	✓		
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:			
	1. Maintained at the facility; and	✓		
	2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?	✓		

FORM HW-001 (5/82)

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE MANIFEST

Please TYPE all information.

PART A: GENERATOR'S COPY

DOCUMENT NO. NJ 0146333

GENERATOR NAME: The Harshaw Chemical Company	PHONE (INCLUDE AREA CODE): 609-456-3930	EPA ID NO.: NJD000312371
ADDRESS (STREET - CITY - STATE): Foot of Water Street Gloucester City, New Jersey		ZIP CODE: 08030
TRANSPORTER NO. 1: R & R Sanitation Service	PHONE (INCLUDE AREA CODE): 201-895-2082	EPA ID NO.: NJD064265838
ADDRESS (STREET - CITY - STATE): Calais Road, Mt. Freedom, New Jersey 07970-0518		ZIP CODE:
TRANSPORTER NO. 2:	PHONE (INCLUDE AREA CODE):	EPA ID NO.:
ADDRESS (STREET - CITY - STATE):		ZIP CODE:
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY: SCA Chemical Services Inc.	PHONE (INCLUDE AREA CODE): 716-754-8231	EPA ID NO.: NYD049836679
SITE ADDRESS (STREET - CITY - STATE): 1135 Balmer Rd. Model City, New York		ZIP CODE: 14106

IF 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 NO.	CONTAINERS TYPE	EPA HAZ CODE	EPA WASTE TYPE
1.	Waste Tar Residue			2	25	2	01	06		
2.										
3.										
4.										
5.										
6.										

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)

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, marked and labelled 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 were 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 - ALSO PRINT SIGNATURE	TITLE	DATE SHIPPED (MO. DAY YR.)	EXPECTED ARRIVAL DATE (MO. DAY YR.)
R K Stewart Kevin Stewart	[illegible]	02 24 83	02 25 83

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE	TRANSPORTER NO. 1 VEHICLE ID NO.	DATE RECEIVED (MO. DAY YR.)
[illegible]	NJSWAS 3745 DA	02 24 83

Form DWM 022
10/82

NEW JE[illegible] DEPARTMENT OF ENVIRONMENTAL PR[illegible]TION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

NO. _____

FIELD SAMPLING DATA SHEET

DATE: 4/13/83 HW/EF #: 04-1403

E.P.A. ID #: NJD000317371

CASE NAME: Daspic Chemical Corp

TIME OF SAMPLING: 1500 HOURS

LOCATION: Water St
Gloucester City, NJ

COLLECTED BY: [illegible]

RECORDED BY: [illegible]

CONTACT: [illegible]

FIELD SAMPLE NO. A: NF 41383 C

B: _____

SPECIFIC SAMPLING SITE:

- [X] DRUM # [illegible]
- [ ] TANK TRAILER # _____
- [ ] STATIONARY TANK # _____
- [ ] HORIZONTAL [ ] VERTICAL [ ] UNDERGROUND
- [X] TOP [ ] MIDDLE [ ] BOTTOM
- [X] OTHER [illegible]

SAMPLING CONTAINER:

- [X] GLASS [ ] PLASTIC
- [ ] OTHER _____

CONTAINER VOLUME:

- [X] PINT [ ] QUART
- [ ] OTHER _____ OZ./ _____ ML.

CONTAINER FILLED: [X] YES [ ] NO

CHAIN OF CUSTODY INITIATED

[X] YES [ ] NO

TYPE OF SAMPLE:

- [ ] LIQUID [X] SLUDGE
- [X] SOLID [ ] SOIL
- [ ] OTHER _____

CHARACTERISTICS OF SAMPLE:

- [X] TURBID [ ] TRANSPARENT
- COLOR [illegible]
- ODOR [illegible]
- OTHER [illegible]

SUSPECTED SUBSTANCE(S):

[illegible]

ADDITIONAL INFORMATION:

[illegible]

Form DWM 022
10/82

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

NO. _____

FIELD SAMPLING DATA SHEET

DATE: 4-13-83 HW/EF #: 04-1903

E.P.A. ID #: NJD000312371

CASE NAME: Amspec Chemical Corp TIME OF SAMPLING: 1500 HOURS

LOCATION: Water St. Gloucester City, NJ

COLLECTED BY: [illegible]

RECORDED BY: [illegible]

CONTACT: Kevin Stewart

FIELD SAMPLE NO. A: AF 41383 B

B: _____

SPECIFIC SAMPLING SITE:

- [x] DRUM # [illegible]
- [ ] TANK TRAILER # _____
- [ ] STATIONARY TANK # _____
- [ ] HORIZONTAL [ ] VERTICAL [ ] UNDERGROUND
- [x] TOP [ ] MIDDLE [ ] BOTTOM
- [ ] OTHER [illegible]

SAMPLING CONTAINER:

- [x] GLASS [ ] PLASTIC
- [ ] OTHER _____

CONTAINER VOLUME:

- [x] PINT [ ] QUART
- [ ] OTHER _____ OZ./ _____ ML.

CONTAINER FILLED: [x] YES [ ] NO

CHAIN OF CUSTODY INITIATED

[x] YES [ ] NO

TYPE OF SAMPLE:

- [ ] LIQUID [ ] SLUDGE
- [x] SOLID [ ] SOIL
- [ ] OTHER _____

CHARACTERISTICS OF SAMPLE:

- [x] TURBID [ ] TRANSPARENT
- COLOR: Black
- ODOR: no
- OTHER _____

SUSPECTED SUBSTANCE(S):

[illegible]

ADDITIONAL INFORMATION:

(1) [illegible] PCB's
(2) [illegible]
(3) pH
(4) [illegible]
(5) [illegible]

Form DWM-022
10/82

NEW JER... DEPARTMENT OF ENVIRONMENTAL PR... ION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

NO. _____

FIELD SAMPLING DATA SHEET

DATE 4/13/83 HW/EF # 04-1403

E.P.A. ID # NJD000312571

CASE NAME The Harshaw Chemical Co.
Now - Amspec Chem. Co.

TIME OF SAMPLING 1500 HOURS

LOCATION
Water St
Gloucester City, N.J.

COLLECTED BY: Albert Fraliger

RECORDED BY: Albert Fraliger

CONTACT: Kevin Stewart

FIELD SAMPLE NO. A 41303 A
B _____

SPECIFIC SAMPLING SITE:

- ☐ DRUM # _____
- ☐ TANK TRAILER # _____
- ☐ STATIONARY TANK # _____
- ☐ HORIZONTAL ☐ VERTICAL ☐ UNDERGROUND
- ☐ TOP ☐ MIDDLE ☐ BOTTOM
- ☒ OTHER Leakage From Roll off

SAMPLING CONTAINER:

- ☒ GLASS ☐ PLASTIC
- ☐ OTHER _____

CONTAINER VOLUME:

- ☒ PINT ☐ QUART
- ☐ OTHER ____ OZ / ____ ML

CONTAINER FILLED: ☐ YES ☒ NO

CHAIN OF CUSTODY INITIATED

☒ YES ☐ NO

TYPE OF SAMPLE:

- ☒ LIQUID ☐ SLUDGE
- ☐ SOLID ☐ SOIL
- ☐ OTHER _____

CHARACTERISTICS OF SAMPLE:

- ☒ TURBID ☐ TRANSPARENT
- COLOR Black
- ODOR No
- OTHER _____

SUSPECTED SUBSTANCE(S):

Waste alcohols & sodium methylate solvent, NaOH solution

ADDITIONAL INFORMATION:

1. Check pH -
2. Run EP, Toxicity
3. Oil and grease
4. Flash

TO Dave Schri

FROM Wayne Howitz (WH) DATE 6/7/83

SUBJECT Sample Analysis Classification

Attached are sample analysis that require a hazardous or non-hazardous classification.

Sample #	Sample Obtained From	Case #
AF41383A	Leakage from Roll Off	04-14-03
AF41383B	Drum	04-14-03
AF4138C	Drum	04-14-03 04130

kas
Attachments
cc Al Fralinger

Stablex-Reutter Inc.

Ninth and Cooper Streets
P.O. Box 499
Camden, New Jersey 08101

"SOLUTIONS START HERE"

Case 04-14-05

May 31, 1983

NJDEP
Division of Waste Management
120 Rt. 156
Yardville, NJ 08620

Attention: Mr. Wayne Howitz

Reference: Test Report No. SR8137

This report covers the analysis of one (1) non-aqueous and two (2) solid samples submitted to Stablex-Reutter, Inc. (S-R) on April 21, 1983. The following analyses were requested:

- Miscellaneous Analysis
  - Oil and Grease
  - pH
  - Flash Point
- Inorganic Analysis
  - EP Extractable Metals
- Organic Analysis
  - EP Extractable Pesticides

This report is organized in the following manner:

- Analysis
- Analytical Data

Stablex-Reutter Inc.

Ninth and Cooper Streets
P.O. Box 499
Camden, New Jersey 08101

"SOLUTIONS START HERE"

I. Analysis

The samples were analyzed according to the following publications:

- EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846
- ASTM D93, Test Method for Flash Point by Pensky-Martens Closed Cup.
- Federal Register, Vol. 45, No. 98, May 19,1980 - Section 261.24, Characteristic of EP Toxicity
- Method 608, Federal Register, Vol. 44, No. 233, December 3, 1979.

II. Analytical Results

The parameters analyzed and results are delineated in the following tables. The interlaboratory variability of the parameters analyzed in the type of sample matrix submitted has not been established by EPA and is probably at least ± 20%.

A. Miscellaneous Analysis

	Sample and Designation		
Parameters	SR8137-1 AF41383A	SR8137-2 AF41383B	SR8137-3 AF41383C
	Hazardous	Non-Hazardous	Hazardous
Oil and Grease, %	0.47	NA	7.1
pH, units	13.23	7.26*	NR*
Flash Point, °F, Closed Cup	91	NA	NR

NA - Not Able to be analyzed due to insufficient sample size submitted.
NR - Not Requested

* Prior to analysis, the sample was prepared by leaching 5.0 grams of sample with 50 milliliters deionized water.

Phone 609/541-6300
Telex 834477

Stablex-Reuter Inc.

Ninth and Cooper Streets
P.O. Box 499
Camden, New Jersey 08101

"SOLUTIONS START HERE"

B. Inorganic Analysis

EPA - EP Results

Constituent	SR8137-1 AF41383A	SR8137-2 AF41383B	SR8137-3 AF41383C	EP Toxicity Limits
	Sample and Designation			
Arsenic, total	<0.05	<0.05	<0.05	5.0
Barium, total	0.18	0.28	0.57	100.0
Cadmium, total	<0.02	0.07	0.06	1.0
Chromium, total	8.0	0.47	220	5.0
Lead, total	<0.05	<0.05	<0.05	5.0
Mercury, total	0.005	0.004	0.009	0.2
Selenium, total	<0.01	<0.01	<0.01	1.0
Silver, total	<0.05	<0.05	<0.05	5.0
Nickel, total	<0.05	<0.05	<0.05	---

Above results are expressed in micrograms of constituent per milliliter of EP Extract (ppm).

C. Organic Analysis

EPA - EP Results

Parameter	SR8137-1 AF41383A	SR8137-2 AF41383B	SR8137-3 AF41383C	EP Toxicity Limit
	Sample and Designation			
Endrin	<0.02	<0.02	<0.02	0.02
Lindane	<0.4	<0.4	<0.4	0.4
Methoxychlor	<10	<10	<10	10.0
Toxaphene	<0.5	<0.5	<0.5	0.5

Above results are expressed in micrograms constituent per milliliter of EP extract (ppm).

Stablex-Reutter Inc.

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P.O. Box 499
Camden, New Jersey 08101

Quality Assurance Data

SR8137-3 + Spike

Parameter	SR8137-1, Duplicate	Amount of Spike, ppm	% Recovery
Arsenic	---	1.0*	95
Barium	0.18	1.0	99
Cadmium	<0.2	1.0	73
Chromium	7.3	1.0	---
Lead	<0.05	1.0	128
Mercury	0.004	0.1	87
Selenium	---	1.0*	104
Silver	<0.05	1.0	95
Nickel	<0.05	1.0	121

* This spike was performed on sample no. SR8137-2.

SR8137-1 + Spike

	SR8137-3 Duplicate	Amt. of Spike, ppb	% Recovery
Endrin	<0.02	130.8	124
Lindane	<0.4	28.8	97.9
Methoxychlor	<10	504	100
Toxaphene	<0.5	---	---

If you have any questions concerning the above analysis, please don't hesitate to contact me.

Respectfully submitted,

STABLEX-REUTTER, INC.

William J. Ziegler

William J. Ziegler
Laboratory Manager

WJZ/pd

Stablex-Reutter Inc.

LABORATORY NOTEBOOK ACCOUNTABILITY RECORD

ANALYSIS	SAMPLE NO. (S-R)	OSW DESIGNATION	NOTEBOOK NUMBER	PAGE(S)	DATE	ANALYST
O+G	8137, 1-3	AF 41383 A AF 41383 B AF 41383 C	1213	35	5/6	Lde A
pH			1210	35	4/22	DB
Flash Point			1210	57	5/6	DB
EPA Cp			1207	52	4/25	Lde A
digestions			1175	43, 45	4/27	LB
Pesticide prep			1174	78 81	5/2	CC
Pesticide analyses			1208	59, 60, 61, 64	5/14	DD
As, Cr, Pb, Hg, Ag, Ni			1209	57, 61, 62, 64, 65	5/5, 5/6	MM
Ba, Se			1213	30, 17	5/[illegible] 5/[illegible]	BF
Cd			Kp [illegible] Cp [illegible]		4/28	MN

Form DVM 006
2/83

NEW JE Y DEPARTMENT OF ENVIRONMENTAL TECTION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

ENFORCEMENT REFERRAL

TO: D Shotwell thru M. Robinson DATE: 6/22/83

FROM: D. Potts thru C. Krause REGION: RED LION

RE: Amspec Chemical Corp. (Harshaw Chemical) - HW/EF# 04-14-03 + Gloucester Ci
Name of Facility / ID Number / Location Address

LOT: 2,8,9,7,7A,16,14,17 BLOCK: 110, Gloucester City, Camden
Lot and Block / Township / County

Foot of Water Street, Gloucester, John Gustausen,
Mailing Address / Responsible Party

The attached inspection/investigation report(s) dated 4/13/83 is being referred and it is recommended a A.O be issued for violations of:

NJAC 7:26– 9.4(g)6 through iv – The Co. (Amspec) failed to maintain documents and records pertaining to personnel training.

7.4(a)1 – The Co. (Amspec) failed to properly complete the manifest, (# NJ0146333) – not all wa typ

9.2(a)2 – The Co. (Amspec) caused an unauthorized discharge of hazardous waste onto the land, (Sample # AF 41383A).

NJSA 58:10–

Suggested penalty: Standard BF.O penalty assessment procedures should be followed.

ADDITIONAL COMMENTS:

(1) Require Co. to develop and maintain required documents & records within 30 days.

(2) Require Co. to cleanup all spilled material within 15 days and properly dispose of contaminated soil within 30 days.

(3) Require Co. to submit information pertaining to lacking informa on manifest # NJ0146333.

REVIEWED AND APPROVED BY:

David F. Potts

Vincent S Kusal

attach

cc: HW/EF # 04-14-03

A. Fraleigh

D. Potts

C. Krause

White – Enforcement and Compliance Copy
Yellow – Region Copy

RCRA INSPECTION REVIEW SHEET

04-73

Name of Facility - HARSHAW CHEMICAL
RCRA ID# - NJ D000 312371
Date of Inspection - 2/11/82
Type of Inspection: Generator Transporter TSD
Name of EPA/State Inspector -
Mike Nalbone

Findings of Inspection: Company was in violation of 262.31
265.15(b)(c)(1)
265.16(d)
265.171
265.173(a)

Action(s) Taken:
NONE

Action(s) Recommended:
I recommend the company receive a notice of non compliance and be required to comply as well as initiate a faster clean up program for the amount of drums on site now stored.

Attachment B

[illegible]

COMPANY NAME: Harshaw Chem.

EPA I.D. NUMBER: NJD000 312371

COMPANY ADDRESS: Foot of Water St
Gloucester City NJ

COMPANY CONTACT OR OFFICIAL: Charlie Haury

INSPECTOR'S NAME: Mike Nalborn

TITLE: Environmental Control Supr.

BRANCH/ORGANIZATION: NJDEP

CHECK IF FACILITY IS ALSO A TSD FACILITY X

DATE OF INSPECTION: 2/11/82

	YES	NO	DON'T KNOW
(1) Is there reason to believe that the facility has hazardous waste on site?	X		

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

X Company admits that its waste is hazardous during the inspection.

X Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

/ / The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

/ / The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

/ / The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

/ / EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

/ / Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	Yes	No	Don't Know
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?		X	

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

see attached sheet

d. Describe the activities that result in the generation of hazardous waste.

see attached sheet

(2) Is hazardous waste stored on site? X

a. What is the longest period that it has been accumulated?
company is trying to remove material effective by 90 days. Prior to my inspection and 1 year ago waste is stored over 3 years.

b. Is the date when drums were placed in storage marked on each drum? X
Most of material known as waste is labeled [some unknowns were not]

(3) Has hazardous waste been shipped from this facility since November 19, 1980? X

a. If "yes," approximately how many shipments were made?

38

(4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? 38

a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made? X

b. If "no" or "don't know," please elaborate.

	Yes	No	Not Chk'd
c. Does each manifest (or a representative sample) have the following information?			
– a manifest document number	X		
– the generator's name, mailing address, telephone number, and EPA identification number	X		
– the name, and EPA identification number of each transporter	X		
– the name, address and EPA identification number of the designated facility and an alternate facility, if any?	X		
– a description of the wastes (DOT)	X		
– the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	X		
– a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the department of transport ation and the EPA	X		
(5) Were there any hazardous wastes stored on site at the time of the inspection?	X		
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks sealed?		X	
b. If not properly packaged or in good condition, please explain. waste materials were in drums which were leaking due to rusting.			
c. Are containers clearly marked and labeled? ALL were not but most of the containers were.	X		
d. Do any containers appear to be leaking?		X	
e. If "yes," approximately how many? unknown because of the melting snow, ice and water ponding on site. I observed drums without lids which were overflowing and rotted drums.			

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? — sent it to the State DEP

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? — X

a. If "no," have Exception Reports been submitted to EPA covering these shipments? —

(8) General comments.

The company control supervisor Charlie Haury appears to be interested in the clean up and reorganization which has been going on for approximately one year. The HARSHAW Chem. Corporate office also is concerned about the poor conditions in the yard according to Mr. Haury.

On site many drums were designated as waste material. There were also drums which were unknown and needed testing and analysis for identification. I observed waste chromium mixed with water still in the diked area of the tank farm. No pumping out was initiated when the spillage occurred. It happened days ago according to Mr Haury. I also observed many open top drums consisting of waste material and oil waste. The total number of drums on site for clean up is approx 1000 drums. H.Cl clean up waste material is being sent offsite via manifest.

* The effective date for this report was March 1, 1982.

WASTE	generated	Amount Disposed
1) Hazardous waste Liquid N.O.S chromium	a byproduct from mother liquor	1,268,500 lbs.
2) WASTE $NaOCH_3$ Alcohol Mixture	a reactor clean out material	141,420 lbs.
3) waste propargyl alcohol	a still bottom of organic reactions	34,990 lbs.
4) waste Ethyl Alcohol	a reactor clean out material	17,760 lbs.
5) waste oil (Total 100 drums)	clean out material stored on site approx 3 yrs.	currently under analysis
6) waste chem. (Total 100 drums)	accumulation of chemical materials over a 10 year period	currently under analysis
7) waste propargyl alcohol	approx 55 drums on site now being transferred into better containers.	
8) waste methylate lab samples	50 drums now underway for disposal	

* waste material for disposal sent to SCD services in Newark N.J.

[illegible] FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: HARSHAW Chem. EPA I.D. Number: NJ D000 312371

COMPANY ADDRESS: Foot of Water St.
Gloucester City N.J.

COMPANY CONTACT OR OFFICIAL:

OTHER ENVIRONMENTAL PERMITS HELD

BY FACILITY: [X] NPDES

[ ] AIR

[ ] OTHER

TITLE:
Charlie Hawry
Envir. Control. Supervisor

INSPECTOR'S NAME:
Mike Nelbone

DATE OF INSPECTION: 2/11/82

BRANCH/ORGANIZATION:
NJDEP

TIME OF DAY INSPECTION TOOK PLACE: 10:30

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

[X] Company admits that its waste is hazardous during the inspection.

[X] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

[ ] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

[ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

[ ] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

[ ] EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

[ ] Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?		X	

Please explain:

c. Identify the hazardous wastes that are on site, and estimate approximate quantities of each.

(2) Does the facility generate hazardous waste?	X		
(3) Does the facility transport hazardous waste?		X	
(4) Does the facility treat, store or dispose of hazardous waste?	X		

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	X		
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	Fenced		
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	X		
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27) Flammable materials	X		
a. If "YES", what are the approximate quantities?	approx 5,000 gallons max		
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	X		
c. If "YES", explain stored inside and segregated. Area is explosion proof where all apparatus is fixed for non ignition switches. The chromium waste is pumped directly in an above ground tank			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	X		
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	X		
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	X		
- damage the structural integrity of the device or facility containing the waste?	X		
- threaten human health or the environment?	X		

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

(7) Does the facility comply with preparedness and prevention requirements including maintaining (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?	X		
- a telephone or other device to summon emergency assistance from local authorities?	X		
- portable fire equipment?	X		
- adequate aisle space?	X		
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	X		

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? N/A

N/A

If you have, please comment, as appropriate.

(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. N/A

b. Do you believe that operation of this facility may affect groundwater quality? N/A

c. If "YES", explain.

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? X

a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?

b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)

c. Does each manifest (or a representative sample) have the following information?

- manifest document number

N/A

* This requirement applies only after [illegible] 19, 1981.

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number			
- the name, and EPA identification number of each transporter			
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;			
- a DOT description of the wastes			
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle			
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA			
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.			
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)	X		
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ___ All wastes are basically the same X Company treats all waste as hazardous X Don't know ___			
b. Does hazardous waste come to this facility from off-site sources?		X	
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?		N/A	
(12) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?		X	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?		X	
c. Does the owner/operator record inspections in a log?		X	
d. Is there evidence that problems reported in the inspection [illegible] have not been [illegible]. If "Yes," please explain.		X	

N/A

	YES	NO	N/A

(13) PERSONNEL TRAINING (§265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? — X —
- type and amount of training to be given to personnel in jobs related to hazardous waste management? — X —
- actual training or experience received by personnel? — X —

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51) X — —

a. Does the plan describe arrangements made with local authorities? X — —

b. Has the contingency plan been submitted to local authorities? X — —

How do you know?

c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? X — —

d. Does the plan have a list of what emergency equipment is available? X — —

e. Is there a provision for evacuating facility personnel? X — —

f. Has an Emergency Coordinator present on or on call at the time of the inspection? X — —

(15) Does the owner/operator keep a written operating record with: (§265.73)

- a description of wastes received with reference and dates of treatment, storage or disposal? — — —
- location and quantity of each waste? — — —
- detailed records and results of waste analysis and trackability tests performed on wastes coming into the facility? — — —
- detailed operating activity reports and description of all emergency incidents that required the implementation of the facility contingency plan? — — —

N/A

*(16) Does the facility have written closure and post-closure plans? (§265.110) X — —

a. Does the written closure plan include:

- a description of how and when the facility will be partially (if applicable) and ultimately closed? X — —

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* Effective date for this requirement is May 19, 1981.

- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility? X

- a description of the steps necessary to decontaminate facility equipment during closure? X

- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed? X

b. What is the anticipated date for final closure? when company ceases operation

c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities? N/A

d. Does the written post-closure plan include:

- a description of planned groundwater monitoring activities and their frequencies during post-closure? N/A

- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure? N/A

- the name, address and phone number of a person or office to contact during post-closure? N/A

*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it? $35,000 X

*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144) N/A N/A

*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, pile, land fill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)

a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste management area? N/A

b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area? N/A

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[1] These sections apply only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	
	Other _____	

	YES	NO	DON'T KNOW
CONTAINERS (§265.170)			
1. Are there any leaking containers? If "YES", explain. Many drums with no lids and drums with rotted metal were observed all leaking or overflowing.	X		
2. Are there any containers which appear in danger of leaking? If "YES", explain. A portion of the drums were in poor condition and may leak.	X		
3. Do wastes appear compatible with container materials?	X		
4. Are all containers closed except those in use?		X	see above with lids open.
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?		X	
6. How often does the plant manager claim to inspect container storage areas? observation at least three times a week			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain.		X	
8. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line?	X		
9. How many containers with hazardous waste? Approx 1000 drums on site. Steel drums and fibre paks were noted			

TANKS ([illegible])	YES	NO	[illegible]
1. Are there any leaking tanks? If "YES", explain.		X	
2. Are there any tanks which appear in danger of leaking. If "YES", explain.		X	
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.		X	
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	X		
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?	X		
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.		X	
7. How often does the plant manager claim to inspect container storage areas?	3 times a week		
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.	N/A		

The tank is isolated ~~[illegible]~~ and diked to prevent accidental damage although ignitable wastes are not stored in tank.

9. What is the approximate number and size of tanks containing hazardous wastes? 1 tank approx 2000 gal.

SURFACE IMPOUNDMENT ([illegible])			
1. Is there at least 2 feet of freeboard in the impoundment?			
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.			
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

June 16, 1983

Mr. Jonathan Berg
Bureau of Field Operations
New Jersey Department of
Environmental Protection
20 Route 156
Yardville, New Jersey 08620

Re: Harshaw Chemical Company
EPA I.D. No. NJD000312771

Dear Mr. Berg:

As you are aware, waste generated at Harshaw Chemical Company, and subsequently shipped (January 27, 1983) to SCA Chemical Services, Model City, New York, was implicated in a fire at the SCA site. The fire itself was contained in Landfill No. 10.

I have enclosed reports recently received at the Environmental Protection Agency (EPA) from the New York State Department of Environmental Conservation (DEC) for your review and action.

Harshaw Chemical Company is in the process of formally closing the storage area, and will continue to generate and accumulate (less than 90 days) waste on-site.

If you should have any questions, do not hesitate to contact me at 212/264-2377.

Sincerely yours,

Philip D. Guarraia
Environmental Scientist
Solid Waste Branch

Enclosures

cc: Frank Coolick, Chief
Bureau of Engineering Review
and Planning, NJDEP w/encls.

James Groebe, Environmental
Conservation Officer Investigator
NYSDEC w/encls.

SCA CHEMICAL SERVICES, INC.
AN SCA SERVICES COMPANY
1550 Balmer Road
Model City, New York 14107
(716) 754-8231

SCA CHEMICAL SERVICES

May 12, 1983

CERTIFIED

New Jersey Department of
Environmental Protection
Route 156
Yardsbille, New Jersey 08620

ATTENTION: Mr. Jonathan Berg

Dear Mr. Berg:

Enclosed, please find the information you requested during our telephone conversation on Thursday, May 5, 1983.

Sincerely,

SCA CHEMICAL SERVICES, INC.

Paul Letki

Paul Letki
Environmental Manager
Model City Site

PL/gg

Enc.

cc: R. Covel

SCA CHEMICAL SERVICES, INC.
AN SCA SERVICES COMPANY
1550 Balmer Road
Model City, New York 14107
(716) 754-8231

SCA CHEMICAL SERVICES

February 7, 1983

Ms. Jacqueline E. Schafer
Regional Administrator
United States EPA
Region II
26 Federal Plaza
New York, New York 10007

Dear Ms. Schafer:

As required per the Federal Register, Volume 45, No. 98, dated Monday, May 19, 1980, paragraph 265.56 (j); SCA Chemical Services, Inc., of 1550 Balmer Road, Model City, New York 14107, is submitting this report of a small, contained waste fire in its secure chemical landfill No. 10.

A chronological list of events surrounding the incident follows.

Date	Time	Comments
12/17/82	----	1. A request to evaluate a waste stream described by the customer, Harshaw Chemical, as partially crushed drums containing solid sodium hydroxide was received.
12/20/82	----	2. Based on the information received, the waste was approved for secure landfill disposal.
12/26/82	----	3. A bulk dump load of the waste arrived at SCA, Model City (Manifest No. NJ0146322). Upon arrival, the waste load was visually checked. The plastic lined dump truck contained empty crushed drums, parts of drums and a small amount of solid sodium hydroxide. An off-specification Shipment Report was generated because the waste load did not exactly match the original description. The waste still met landfilling requirements and therefore, was accepted for secure chemical landfill disposal. The waste was visually checked during off loading to assure uniformity of the waste load.
1/28/83	8:40 a.m.	4. A second shipment of the waste (Manifest No. NJ 014-6325) as described above was received. The load was visually checked. The plastic lined dump truck again contained empty crushed drums, parts of drums and a small amount of solid sodium hydroxide. The waste was

Date	Time		Comments
			accepted for disposal based on the new waste description generated in Step 3.
1/28/83	8:55 a.m.	5.	The waste was off loaded into the secure landfill.
1/28/83	9:00 a.m.	6.	Upon off loading, the visual inspection by the secure landfill operator revealed a small fire in the waste pile. The SCA Contingency Plan was immediately implemented.
1/28/83	9:05 a.m.	7.	Upon assessment of the situation, the operator immediately notified SCA's onsite Fire Chief.
1/28/83	9:10 a.m.	8.	The facility fire alarm was sounded. Simultaneously, the operator covered the waste with soil. This extinguished the fire and the immediate danger was checked.
1/28/83	9:20 a.m.	9.	Upon investigation by SCA's onsite Fire Chief, Plant Manager and Laboratory Manager, 6 X~10 gallon drums and 2 X~2 gallon containers, all without lids, contained what appeared to be reactive metal (possibly sodium). The metal had a residual amount of oil on it. The drums and containers were found dispersed and concealed by the waste load. - Apparently during off loading, one of the drums containing the suspected reactive metal tipped over and upon contact with the moist surrounding caught fire due to the generation of heat supplied by the heat of reaction.
1/28/83	9:35 a.m.	10.	The drums and containers were placed in 5 X 55 gallon open top drums and covered with oil eliminating any further danger.

The reactive metal waste will either be reacted off under controlled conditions by SCA or sent to a NYS DEC approved treatment facility for final disposition.

Although the situation was potentially hazardous, the immediate action taken by SCA personnel eliminated any possible impacts on human health or the environment.

It should be noted that SCA would not have accepted the waste if it had knowledge of the actual contents. An objective and critical review of the waste acceptance program revealed that a single incident requiring contingency implementation was required during the acceptance of over 6,000 waste loads in the past year. It is believed that the present waste analysis plan is sufficient and reasonable.

The onsite New York State Department of Environmental Conservation monitors were made aware of the situation. They have reported the incident to their superiors.

The following names, addresses and phone numbers are listed per reporting requirements:

Name	Position	Address	Phone #
George H. Spira	Facility Vice President & General Manager	SCA Chemical Services 1335 Balmer Road Model City, NY 14107	(716) 754-8231
James Greeley	Facility Plant Manager	SCA Chemical Services 1550 Balmer Road Model City, NY 14107	(716) 754-8231
Paul Letki	Facility Environmental Manager	SCA Chemical Services 1550 Balmer Road Model City, NY 14107	(716) 754-8231

If you have any questions concerning this incident, please contact me at (716) 754-8231.

Sincerely,

Paul Letki

Paul Letki
Environmental Manager

PL/km

cc: George Spira - SCA/MC
James Greeley - SCA/MC
George Kush/Kevin Grant - SCA/Somerville
John Beecher - NYS DEC/Buffalo
John Kehoe - NCHD

specialty
chemicals

John C. Gustavsen
President

AMSPEC

At the foot of Water Street
Gloucester City, New Jersey 08030

Toll-free (800) 5AMSPEC
In New Jersey (609) 456-5930

August 2, 1983

N.J.D.E.P. Southern Field Office
Division of Waste Management
Rd #1 Rt 70
Vincenton, NJ 08088

Attn: Mr. D. Potts

Dear Mr. Potts:

Enclosed please find a copy of New Jersey Hazardous Waste Manifest No. NJ0157174. Item Number 3 is the material which Mr. Al Freylinger sampled in our trash container.

As I explained to you on the telephone on July 20, 1983, SCA Chemical Services was unable to remove this material from our property for disposal because they had some temporary bottleneck at their facility. We are currently looking for alternate TSDs so that we can avoid future excursions over the 90 day storage limit.

Sincerely,

AMSPEC CHEMICAL CORPORATION

J. C. Gustavsen
President

JCG/kac

enclosure

MENT OF ENVIRONMENTAL PROTECTION

Please TYPE all information.

HAZARDOUS WASTE MANIFEST

PART A: SEND TO GENERATOR'S STATE

DOCUMENT NO. NJ 0157174

GENERATOR NAME	PHONE (INCLUDE AREA CODE)	EPA ID NO.
AMSPEC Chemical Corp.	609-456-3930	NJD000312371
ADDRESS (STREET - CITY - STATE) Foot of Water Street Gloucester Ciy 716-822-1414 New Jersey		ZIP CODE 08030
TRANSPORTER NO. 1 PRICE TRUCKING ~~SCA Chemical Services Company~~	PHONE (INCLUDE AREA CODE) ~~201-465-9100~~	EPA ID NO. NYD046765574 ~~NJD089216790~~
ADDRESS (STREET - CITY - STATE) 67 BEACON ST. BUFFALO, N.Y. 14220 ~~100 Lister Ave. Newark New Jersey~~		ZIP CODE ~~07105~~
TRANSPORTER NO. 2	PHONE (INCLUDE AREA CODE)	EPA ID NO.
ADDRESS (STREET - CITY - STATE)		ZIP CODE
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY SCA Chemical Services Company	PHONE (INCLUDE AREA CODE) 201-465-9100	EPA ID NO. NJD089216790
SITE ADDRESS (STREET - CITY - STATE) 100 Lister Ave. Newark New Jersey		ZIP CODE 07105

IF 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 NO	CONTAINERS TYPE	EPA HAZ CODE	EPA WASTE TYPE
1.	Hazardous waste liquid NOS	ORME	NA9189	1	200	1	004	01	T	F001
2.	Waste Tar Residue			2	100	1	002	01		
3.	Waste Corrosive Solids	Corrosive	1759	2	1000	1	020	01	E	D002
4.	Hazardous Waste Solid NOS	ORME	NA9189	2	50	1	001	01	E	D007
5.										
6.										

TO BE TYPED IN BY GENERATOR

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)

ITEM 2 not hazardous

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, marked and labelled 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 were 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 - ALSO PRINT SIGNATURE	TITLE	DATE SHIPPED (MO DAY YR)	EXPECTED ARRIVAL DATE (MO DAY YR)
K R Stewart KEVIN R STEWART	PLANT ENGINEER	08 01 83	08 01 83

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE	TRANSPORTER NO. 1 VEHICLE ID NO.	DATE RECEIVED (MO DAY YR)
LARRY PERKINS Larry Perkins	NJSWAS 8424AB	08 01 83

TEAR AT THIS PERFORATION