215628

02-9011-20-SI
REV. NO. 0

FINAL DRAFT
SITE INSPECTION REPORT
FLOWEN OIL DELAWARE VALLEY CORP.
CAMDEN, CAMDEN COUNTY, NEW JERSEY
VOLUME 3 OF 3

PREPARED UNDER

TECHNICAL DIRECTIVE DOCUMENT NO. 02-9011-20
CONTRACT NO. 68-01-7346

FOR THE

ENVIRONMENTAL SERVICES DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

JUNE 28, 1991

NUS CORPORATION
SUPERFUND DIVISION

REFERENCE NO. 30

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON
DIRECTOR

LINO F. PEREIRA
DEPUTY DIRECTOR

April 19, 1983

Mr. James Caccese
Production Manager
Flowen Oil Delaware Valley, Inc.
1800 Carman Street
Camden, New Jersey 08105

RE: Request by Flowen Oil Delaware Valley, Inc., Facility No. 0408B, to accept additional waste types at the Camden facility

Dear Mr. Caccese:

Please find enclosed a Modification of Approval Condition 2 of the Amendment to Engineering Design Approval for the above referenced facility.

This Modification of Approval Condition 2 is intended to allow Flowen Oil Delaware Valley, Inc. to accept waste types X722, X724, X725, and X727 only in accordance with the conditions specified in the enclosed document.

The Department of Environmental Protection reserves the right to impose additional conditions should it deem them to be necessary.

Very truly yours,

Edward J. Londres
Assistant Director
Engineering

EJL:jb

Enclosure

MODIFICATION OF APPROVAL CONDITION 2
OF THE AMENDMENT TO
ENGINEERING DESIGN APPROVAL

==========

Under provisions of N.J.S.A. 13:1E-1 et seq. known as the Solid Waste Management Act, Engineering Design approval is hereby issued to:

FLOWEN OIL DELAWARE VALLEY, INC.
CARMAN STREET
CAMDEN, NEW JERSEY 08105

For the purpose of operating a	Hazardous Waste Facility
of the following type	Waste Oil Recycling Plant
On Lot Number(s)	1
Block Number(s)	1431
In the Municipality of	Camden
County	Camden
Under Facility Registration No.	0408B

This approval is subject to compliance with all conditions specified herein and all regulations promulgated by the Department of Environmental Protection.

This approval shall not prejudice any claim the State may have to Riparian Land, nor does it permit the registrant to fill or alter, or allow to be filled or altered, in any way, lands that are deemed to be Riparian, Wetlands, Stream Encroachment or Flood Plains, or within the Coastal Area Facility Review Act (CAFRA) Zone without first acquiring the necessary grants, permits or approvals from the Department of Environmental Protection.

Edward J. Londres
Assistant Director

jb

Date: April 19, 1983

MODIFIED APPROVAL . DITION FOR FLOWEN OIL DELAWARE LLEY, INC.,
CAMDEN, CAMDEN COUNTY

==========

The Amendment to Engineering Design Approval issued to Flowen Oil Delaware Valley, Inc. on January 18, 1983 is hereby revised to allow for the acceptance by Flowen Oil of certain additional waste types.

This revision to the Amended Certificate of Approved Registration and Engineering Design Approval is granted in response to the written request for approval to accept additional waste types by Mr. James Caccese dated March 9, 1983. This revision is granted to allow Flowen Oil to accept certain additional waste types and shall be included as a Modified Condition 2 of the January 18, 1983 Amendment.

Condition 2 shall hence be modified and implemented as follows:

Waste types identified by NJDEP hazardous waste numbers, which Flowen Oil shall be permitted to accept are:

X721 Waste automotive crankcase and lubricating oils from automotive service and gasoline stations, truck terminals and garages.

X722 Waste oil and bottom sludge generated from tank cleanouts from residential/commercial fuel oil tanks.

X724 Waste petroleum oil generated when tank trucks are cleaned.

X726 The following used and unused waste oils: metal working oils; turbine lubricating oils; diesel lubricating oils; and quenching oils.

Flowen Oil shall be conditionally permitted to accept waste types, X725 and X727 as follows:

X725 Oil spill cleanup residue which: a) is contaminated beyond saturation, or; b) the generator fails to demonstrate that the spilled material was not one of the listed hazardous waste oils. Acceptance of waste type X725 is conditional in that the waste shipment must be free-flowing and must be pumped into tanks 1-12 and/or tanks A or B upon arriving at the facility.

Under no circumstance shall contaminated soil, manifested under the waste type X725, be accepted by the facility.

X727 Waste oils from the draining, cleaning or disposal of electric transformers. Acceptance of waste type X727 is conditional in that the PCB content shall be determined for each waste shipment arriving at the facility and the shipment shall be accepted only if the PCB content is less than 50 ppm or less than any future concentration limit set by the Department or Federal agencies.

The NJDEP hazardous waste number for bottom sludge generated from the processing and treatment of waste oil is X728.

Any waste oils containing PCB's (Polychlorinated Biphenyls) at a concentration greater than 50 ppm or greater than any future concentration limit set by the Department or Federal agencies, or; that has a flashpoint below 140°F, or; that is reactive or incompatible with the permitted waste types shall not be accepted by Flowen Oil. A waste oil shipment containing PCB's at a concentration greater than 50 ppm or greater than any future concentration limit set by the Department or Federal agencies, or; that has a flashpoint below 140°F shall be handled in accordance with N.J.A.C. 7:26-9.4(c).

REFERENCE NO. 31

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

LINO F. PEREIRA, P.E.
DEPUTY DIRECTOR

21 MAR 1985

Archie Bilsland, General Manager
Flowen Oil Delaware Valley Inc.
1800 Carman Street
Camden, New Jersey 08105

Re: Request for Addition of Waste Exxon Isopar as a New Waste Which Flowen Oil Delaware Valley Inc. May Accept at its Camden Facility

Dear Mr. Bilsland:

This letter is in response to the request you submitted to the Department on December 17, 1984 for authorization to accept for processing waste insoparaffin at the referenced facility from Philip A. Hunt Chemical Corporation, Palisades Park, New Jersey. This waste consists of liquid waste isoparaffinic hydrocarbons which in their pure state carried the name Isopar - brand name of a line of synthetically produced isoparaffinic solvents manufactured by Exxon Company, U.S.A. Isopars are designated as EPA Waste Code No. D001 because of their characteristic of ignitability.

The Bureau of Hazardous Waste Engineering has considered your request. After examination of the characteristics of Isopar solvent, the Bureau has determined that this material is amenable to the waste oil recycling processes carried out at your facility, and is compatible with the types of waste oils you are presently authorized to accept.

Nevertheless, before your facility can begin to accept Exxon Isopars you must submit and obtain approval on the following:

1. Amend your Waste Analysis Plan so as to include procedures by which you can identify D001 waste that derives from (Exxon) Isopars; and preclude acceptance at the facility of D001 waste of any other type.

2. Provide a copy of the amended Waste Analysis Plan to the Department for review and approval.

3. Submit a revised Part A permit application to include the new hazardous waste not previously identified in this document.

Acknowledgement of receipt and acceptance of the revised Part A and amended Waste Analysis Plan by the Department must transpire prior to acceptance of

REFERENCE NO. 32

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
T/A C		

I. Name of Installation

FLOWEN OIL DELAWARE VALLEY INC

II. Installation Mailing Address

Street or P.O. Box: 1800 CARMAN STREET

City or Town: CAMDEN | State: NJ | ZIP Code: 08105

III. Location of Installation

Street or Route Number: 1800 CARMAN STREET

City or Town: CAMDEN | State: NJ | ZIP Code: 08105

IV. Installation Contact

Name and Title *(last, first, and job title)*: ROSS ARCHIE MANAGER | Phone Number *(area code and number)*: 609 365 5544

V. Ownership

A. Name of Installation's Legal Owner: FLOWEN OIL DEL VAL INC

B. Type of Ownership *(enter code)*: P.

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- ☐ 1a. Generator
- ☐ 1b. Less than 1,000 kg/mo.
- ☒ 2. Transporter
- ☒ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner

B. Used Oil Fuel Activities

- ☐ 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es))*

☐ A. Air ☐ B. Rail ☒ C. Highway ☐ D. Water ☐ E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification ☐ B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: NJD980536577

Continue on reverse

X721	X722	X723	X724	X725	X726
X727	X728	D001			

Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

Characteristics of Nonlisted Hazardous Wastes. Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24)*

- [X] 1. Ignitable *(D001)*
- [ ] 2. Corrosive *(D002)*
- [ ] 3. Reactive *(D003)*
- [ ] 4. Toxic *(D004)*

III. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
A Loss	A. ANDREW LOSS / VICE PRESIDENT	9/26/86.

WAP-3 WASTE CHARACTERISTICS

The waste types capable of being processed at the facility are covered by the New Jersey Department of Environmental Protection's categories as listed below. It should be noted that the facility permit does not allow any other type of material to be treated at the facility. Other materials must be subjected to a qualification procedure by both company management and NJDEP prior to its acceptance by the facility.

N.J Hazardous Waste Number	The waste categories are as follws:	Hazard Code
	Hazardous Waste	
X721	Waste automotive crankcase and lubricating oils from automotive service and gasoline stations, truck terminals, and garages.	(T)
X722	Waste oil and bottom sludge generated from tank cleanouts from residential/commercial fuel oil tanks.	(T)
X723	Waste oils and bottom sludge generated by gasoline stations when gasoline and oil tanks are tested, cleaned, or replaced.	(T)
	NOTE: Oil in this category must meet the criteria of flashpoint in that the flashpoint must 100°F or greater as determined by the method in Attachment 3.	
X724	Waste petroleum oil generated when tank trucks are cleaned.	(T)
X725	Oil spill cleanup residue which: A. is contaminated beyound saturation; or, B. The generator fails to demonstrate that the spilled material was not one of the listed hazardous waste oils.	(T)
	Under no circumstance shall contaminated soil, manifested under the waste type X725, be accepted at the facility.	
X726	The following used and unused waste oils; metal working oils; turbine lubricating oils; diesel lubricating oils; and quenching oils.	(T)

N.J. Hazardous Waste Number	Hazardous Waste	Hazard Code
X727	Waste oils from the draining, cleaning or disposal of electric transformers. Acceptance of waste type X727 is conditional in that the PCB content shall be determined for each waste shipment arriving at the facility and the shipment shall be accepted only if the PCB content is less than 50 ppm or less than any future concentration limit set by the Department or Federal agencies.	(T)
X728	Bottom sludge generated from the processing, blending and treatment of waste oil in waste oil processing facilities. NOTE: Only sludges which are pumpable and meet the other criteria as listed in Attachment 4 will be accepted for treatment at the facility.	(T)
D001	Waste isoparaffinic washing solvents from Philip A Hunt Chemical Corp., Palisades Park, New Jersey 07650 only. This material shall have a flashpoint of greater than 100° and as determined by the procedure detailed in attachment 3.	

REFERENCE NO. 33

CECOS
TREATMENT
CORPORATION

51 BRODERICK ROAD
BRISTOL, CONN. 06010
TEL. 203-583-8917

January 22, 1987

Department of Environmental Protection
Hazardous Waste Management Section
122 Washington Street
Hartford, CT 06106

ATTN: Barry Giroux

Dear Mr. Giroux:

This letter is being written as notification that PCB's were detected in concentrations greater than 50 ppm in material accepted for disposal at this facility. This notification fulfills CTC's reporting requirements as stated in permit CT - HW - 95, appendix "C".

On December 22, 1986, 2255 gallons of material comprised of oil, dioctyl pthalate water, and cleaner was shipped from Jard Company, Inc., of Bennington, VT to CECOS Treatment Corporation on manifest CTB0066657. The material was off loaded into Tank 27, on December 22, 1986. This waste stream had been represented on their waste characterization form as containing no PCB's.

Four thousand, eight hundred and ninety-five more gallons of the same material was also shipped on December 22, 1986 on manifest VT0016621. This was accepted at CTC on December 23, 1986, and was off loaded into tank 27.

CECOS Treatment is unable to analyze this waste stream for PCB's since the dioctyl pthalate mimics arochlor 1242 on an electron capture gas chromatograph. CTC's laboratory is equipped with an electron capture GC. On December 23, a composite was made from retain samples of the Jard loads of December 22 and 23, and was sent to an outside laboratory for PCB analysis via a mass spectrometer. ?

The results were reported to CTC as 7.5 ppm arochlor 1232, on January 5, 1987. On the same day CTC shipped 5500 gallons from Tank 27 to Flowen Oil, Camden, New Jersey, on manifest number NJA0131004. Flowen is permitted to accept PCB's (50 ppm.

On January 6, 1987, CTC prepared to ship Flowen another load comprised of Tank 27, and some drummed material. Final Q.C. revealed that the top layer of the material loaded on Nappi's tanker had a lower flash point than acceptable at Flowen. Therefore, the bottom, aqueous, non flammable layer was pumped back to Tank 27. The top, flammable portion was remanifested to Norlite number NYA3258540, in Cohoues, New York, and was dispatched to that facility. On the morning of January 7, 1987, 5450 gallons from Tank 27 was sent to Flowen Oil on manifest number NJA0131057.

Norlite contacted CTC late in the afternoon of January 7, 1987 that the shipment they received on manifest NYA3258540 appeared to contain PCB's. A sample from the load was expressed overnight from Norlite to the same lab in Connecticut, that provided the analysis yeilding 7.5 ppm arochlor 1232.

The result of this analysis was reported as 144 ppm arochlor 1232. The presence of PCB's in this load was confirmed by two other laboratories. One lab reports 2140 ppm, the other reports 2040.0 ppm.

Data has been accumulated, and the original source of contamination appears to be the material shipped to CTC from the Jard Company. The same sample one lab reported as containing 7.5 ppm PCB's was analyzed by another lab, and was found to contain approximately 3,700.0 ppm PCB's. No other waste streams involved in the shipments to either Norlite or Flowen on January 5 or 7 were found to contain any PCB's. Jard Company has been notified.

Analysis and confirmatory work is still being performed, but there is enough data to support the conclusions that one tank containing 15,000 gallons, and one tank containing 6,000 gallons at Flowen Oil are contaminated; Tank 27 containing 5,390 gallons at CTC; and the tanker rejected from Norlite are all contaminated with PCB's. The tanker is now being held at CTC.

CTC has already initiated proceedings which will allow the PCB contaminated material to be incinerated at Ensco in Arkansas. This approval process generally takes 3 to 4 weeks.

We will keep yourdepartment apprised of any new developments as they arise from this situation.

If you have any questions after reviewing this report, please feel free to contact me at (203) 583-8917.

Sincerely,

CECOS Treatment Corporation

Denise A. Borys

Denise Borys
Technical Manager

DAB/jln

attachments

REFERENCE NO. 34

Fontana-d

Let's protect our earth

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT
John J. Trela, Ph.D., Acting Director
401 East State St.
CN 028
Trenton, N.J. 08625
609 - 633 - 1408

Mr. Archie Ross, Vice President
Flowen Oil Delaware Valley, Inc.
1800 Carman Street
Camden, New Jersey 08105

- 3 FEB 1987

THIS AUTHORIZATION SHALL
EXPIRE ON 12/31/87

Dear Mr. Ross:

Re: Authorization to accept Hazardous Waste Types for Flowen Oil Delaware Valley, Inc., Camden Facility, EPA ID No. 980 536 577

As of this date, Flowen Oil Delaware Valley, Inc. is authorized to accept hazardous waste types identified by New Jersey Hazardous Waste Numbers X721, X722, X723, X724, X725, X726, X727, X728, and D001 (only from Olin Hunt Specialty Products, Inc). This authority is conditioned on Flowen Oil meeting all the requirements set forth in an Administrative Consent Order (ACO) signed with the NJDEP on November 18, 1986.

The ACO authorizes the facility to receive and process hazardous wastes while Flowen Oil's Part B application for a treatment, storage, and disposal facility permit is under review by the NJDEP.

This authorization shall be null and void upon denial or issuance of a finally effective hazardous waste facilities permit.

Very truly yours,

Ernest J. Kuhlwein Jr.

Ernest Kuhlwein Jr., Acting Chief
Bureau of Hazardous Waste
Engineering

EP63/vb
c: Mark McQuerry, ORS

REFERENCE NO. 35

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

United States Environmental Protection Agency
Washington, DC [illegible]

EPA Notification of Hazardous Waste Activity

Please refer to the [illegible] *Filing Notification* [illegible] this form. The information [illegible] here is required [illegible] *3010 of the Resource* [illegible] *and Recovery Act* [illegible]

For Official Use Only

Comments

C
C

Installation's EPA ID Number		Approved	Date Received (yr. mo. day)
C E	T/A C		

I. Name of Installation

FLOWEN OIL DELAWARE VALLEY INC

II. Installation Mailing Address

Street or Route Number

C 3 1800 CARMAN STREET

City or Town	State	Zip Code
C 4 CAMDEN	NJ	08105

III. Location of Installation

Street or Route Number

C 5 1800 CARMAN STREET

City or Town	State	Zip Code
C 6 CAMDEN	NJ	08105

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
C 2 ROSS ARCHIE MANAGER	609 365 5544

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
C R FLOWEN OIL DEL VAL INC	P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- ☐ 1a. Generator
- ☐ 1b. Less than 1,000 kg/mo.
- ☒ 2. Transporter
- ☒ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner

B. Used Oil Fuel Activities

- ☐ 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☒ b. Other Marketer
  - ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es))*

☐ A. Air ☐ B. Rail ☒ C. Highway ☐ D. Water ☐ E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification ☒ B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: NJD980536577

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

Continue on reverse

(Date For Official Use Only)

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1.	2.	3.	4.	5.	6.
X721	X722	X723	X724	X725	X726
7.	8.	9.	10.	11.	12.
X727	X728	D001			

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13.	14.	15.	16.	17.	18.
K048	K049	K050	K051		
19.	20.	21.	22.	23.	24.
25.	26.	27.	28.	29.	30.

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical your installation handles that may be a hazardous waste. Use additional sheets if necessary.

31.	32.	33.	34.	35.	36.
37.	38.	39.	40.	41.	42.
43.	44.	45.	46.	47.	48.

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49.	50.	51.	52.	53.	54.

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- [X] 1. Ignitable *(D001)*
- [ ] 2. Corrosive *(D002)*
- [ ] 3. Reactive *(D003)*
- [ ] 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
	Archie A. Ross/Vice President	8/12/87

WAP-3

WASTE CHARACTERISTICS

The waste types capable of being processed at the facility are covered by the New Jersey Department of Environmental Protection's categories al listed below. It should be noted that the facility permit does not allow any other type of material to be treated at the facility. Other materials must be subjected to an qualification procedure by both company management and NJ DEP prior to its acceptance by the facility.

NJ Hazardous Waste Number	The waste categories are as follows:	Hazard Code
	Hazardous Waste	
X721	Waste automotive crankcase and lubricating oils from automotive service and gasoline stations, truck terminals, and garages.	(T)
X722	Waste oil and bottom sludge generated from tank cleanouts from residential/commerical fuel oil tanks.	(T)
X732	Waste oils and bottom sludge generated by gasoline stations when gasoline and oil tanks are tested, cleaned, or replaced.	(T)
NOTE:	Oil in this category must meet the criteria of flashpoint in that the flashpoint must be 100°F or greater as determined by the method in Attachment3.	
X724	Waste petroleum oil generated when tank trucks are cleaned.	(T)
X725	Oil spill cleanup residue which: A. is contaminated beyound saturation; or, B. the generator fails to demonstrate that the spilled material was not one of the listed hazardous waste oils	(T)

NJ Hazardous Waste Number	Hazardous Waste	Hazard Code
X726	The following used and unssed waste oils; metal working oils; turbine lubricating oils; diesel lubricating oils; and quenching oils.	(T)
X727	Waste oils from the draining, cleaning or disposal of electric transformers.	(T)
	Acceptance of waste type X727 is conditional in that the PCB content shall be determined for each waste shipment arriving at the facility and the shipment shall be accepted only if the PCB content is less than 50 ppm or less than any future concentration limit set by the Department of Federal agencies.	
X728	Bottom sludge generated from the processing, blending and treatment of waste oil in waste oil processing facilities.	(T)
NOTE:	Only sludge which are pumpable and meet the other criteria as listed in attachment 4 will be accepted for treatment at the facility.	
D001	Waste isoparaffinic washing solvents from Philip A. Hunt Chemical corp., Palisades Park, New Jersey 07650 only. This material shall have a flashpoint of greater than 100°F and as determined by the procedure detailed in Attachment 3.	

HAZARDOUS WASTE FROM SPECIFIC SOURCES

EPA HAZARDOUS WASTE NO.		HAZARD CODE
K048	Dissolved Air Flotation (DAF) float from the petroleum refining industry.	(T)
K049	Slop oil emulision solids from the petroleum refining industry.	(T)
K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry.	(T)
K051	API separator sludge from the petroleum refining industry.	(T)

REFERENCE NO. 36

D AF

Let's protect our earth

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
Deputy Director
Hazardous Waste Operations

John J. Trela, Ph.D., Director
401 East State St.
CN 028
Trenton, N.J. 08625
(609)633-1408

Lance R. Miller
Deputy Director
Responsible Party Remedial Action

MAY 12 1988

Mr. Archie Ross, Vice President
Flowen Oil Delaware Valley, Inc.
1800 Carman Street
Camden, New Jersey 08105

THIS AUTHORIZATION SHALL
EXPIRE ON 12/31/88

Dear Mr. Ross:

RE: AUTHORIZATION TO ACCEPT HAZARDOUS WASTE TYPES FOR FLOWEN OIL DELAWARE VALLEY, INC., CAMDEN FACILITY, EPA ID No. 980 536 577

This is to confirm as of this date, Flowen Oil Delaware Valley, Inc. is authorized to accept hazardous waste types identified by New Jersey Hazardous Waste Numbers X721, X722, X723, X724, X725, X726, X727, X728 and D001 (only from Olin Hunt Specialty Products, Inc). This authority is conditioned on Flowen Oil meeting all the requirements set forth in Administrative Consent Orders (ACOs) signed with the NJDEP on November 18, 1986 and November 20, 1987.

The ACOs authorize the facility to receive and process hazardous wastes while Flowen Oil's Part B application for a treatment, storage, and disposal facility permit is under review by the NJDEP.

This authorization shall be null and void upon final agency action denying or approving issuance of a finally effective hazardous waste facility permit.

Very truly yours,

Ernest J. Kuhlwein, Jr.

Ernest J. Kuhlwein, Jr., Chief
Bureau of Hazardous Waste Engineering

EP63/lr
cc: Tom Dowpey, SFO
DOCUMENT: FLOWEN
FOLDER: LXRMCB

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REFERENCE NO. 37

BEN FYI, REVIEW → FILE (TO)

0408 B file in 1989

CN 028
Trenton, N.J. 08625-0028

Let's protect our earth

(609)633-1408

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
Deputy Director
Hazardous Waste Operations

John J. Trela, Ph.D., Director

Lance R. Miller
Deputy Director
Responsible Party Remedial Action

M E M O R A N D U M

TO: Ben Wilbur
Bureau of Southern Enforcement

THROUGH: John H. Skoviak, Section Chief
Bureau of Compliance and Technical Services

FROM: Michael W. Hruse
Program Oversight and Quality Assurance Section

SUBJECT: Flowen Oil (a.k.a Remtech)
AnalytiKem Test Report # A20220

DATE: December 13, 1989

INTRODUCTION

A quality assurance review was performed by Michael Hruse on the Tier 1 data deliverables submitted to BCTS by AnalytiKEM on November 13, 1989. Six (6) samples (1 trip blank, 1 field blank, 3 non-aqueous, 1 aqueous) were collected October 3, 1989. The following analyses were performed:

(1) Volatile Organic Analysis
(Aqueous-EPA Method 624: trip blank, field blank. Non aqueous-EPA Method 8240: MWH-020, MWH-021)

(2) Base Neutral/Acid Extractable Analysis
(EPA Method 8250: MWH-020, MWH-021)

(3) Pesticide/PCB Analysis
(EPA Method 8080: MWH-020, MWH-021)

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DEC 19 1989
Division of Waste Mgt.

(4) Total Priority Pollutant Metals
(SW-846: MWH-020, MWH-021, MWH-022)

(5) EP TOX (Heavy Metals)
(SW-846: MWH-019)

(6) Phenol Analysis
(EPA Method 420.2: MWH-020, MWH-021)

(7) Cyanide Analysis
(EPA Method 9012: MWH-020, MWH-021)

RESULTS OF REVIEW

I. GENERAL REQUIREMENTS

The test report is assembled in the proper format with all required data submitted. The Chain of Custody is adequate.

II. HOLDING TIMES

The samples were collected October 3, 1989 and delivered to AnalytiKEM on the same day. All holding time requirements were met for all analyses except the total cyanide analysis.

The total cyanide analysis for samples MWH-020 and MWH-021 was performed on October 18, 1989. The fourteen day (14) holding time was exceeded by one (1) day.

III. VOLATILE ORGANIC ANALYSIS

A. GC/MS Tune Performance

There were no problems associated with the mass calibration nor the ion abundance criteria for the BFB tunes.

B. GC/MS Initial Calibration

The initial calibration was performed at five (5) concentration levels (20, 50, 100, 150, 200 ppb). The required calculations were completed.

The relative standard deviation for the following compounds was greater than 30 percent: acetone (42%), 2-butanone (40.5%), chloromethane (30.8%), hexanone (35.4%), 2-methyl-2-pentanone (30.8%), tetrachloroethane (31.8%). No action is required since there were no positive results for these compounds.

C. GC/MS Continuing Calibration

Performance criteria for the calibration check compounds (CCC) and system performance check compounds (SPCC) were met for the continuing calibration.

D. Surrogate Spike Analysis

The required surrogate spike analyzes were performed. The data is acceptable.

E. Matrix Spike Analysis

The required matrix spike and matrix spike duplicate (MS/MSD) analyses were performed. The data is acceptable.

F. Blanks

Methylene chloride was detected in the field blank (1.8 ppb), trip blank (2.0 ppb), and aqueous method blank (2.4 ppb). This contamination is probably due to a lab problem since this chemical is a common laboratory solvent.

G. Sample Results

The results are as follows:

MWH-020

1,1-dichloroethene	54,000 ppb	
methylene chloride	88,000 ppb	(JB)
1,1,1-trichloroethane	950,000 ppb	
trichloroethene	9700 ppb	(J)
benzene	11,000 ppb	(J)
tetrachloroethene	28,000 ppb	
toluene	112,000 ppb	
ethylbenzene	31,000 ppb	
xylene (total)	184,000 ppb	

MWH-021

methylene chloride	3100 ppb	(JB)
1,1-dichloroethene	48,000 ppb	
trichloroethene	13,000 ppb	
benzene	8200 ppb	
tetrachloroethene	51,000 ppb	
1,1,2,2-tetrachloroethane	650 ppb	(J)
toluene	1500 ppb	(J)
ethylbenzene	1500 ppb	(J)
xylene (total)	340,000 ppb	

The results reported are reliable and may be used for

its intended purpose. The results for methylene chloride are estimated because of the low levels present in the blanks.

H. Overall GC/MS Performance

The instrument's performance on the day of analysis was acceptable. The average response factors (RFs) for the SPCCs were well above 0.05.

IV. BASE NEUTRAL/ACID EXTRACTABLE ANALYSIS

A. GC/MS Tune Performance

There were no problems associated with the mass calibration nor the ion abundance criteria for the BFB tunes. The data is acceptable.

B. GC/MS Initial Calibration

The initial calibration was performed at five (5) concentration levels (20, 50, 80, 120, 160 ppb). The required calculations were completed.

The negative results for benzidine in samples MWH-020 and MWH-021 are rejected since the RFs for these compounds are less than 0.05. The remainder of the data is acceptable.

C. GC/MS Continuing Calibration

The required calibration check was performed. The RF for benzidine is less than 0.05. The negative results have been rejected in samples MWH-020 and MWH-021. The remainder of the data is acceptable.

D. Surrogate Spike Analysis

The required surrogate spike analysis was performed. The data is acceptable.

E. Matrix Spike Analysis

The required matrix spike analyses were performed. The percent recovery for 4-chloro-3-methlphenol (115%) is not within quality control limits (26-103%). The results for this compound(MWH-020, MWH-021) should be considered an estimate of the true value.

F. Blanks

There were no target compounds detected in any of the blanks.

G. Sample Results

The results are as follows:

MWH-020

naphthalene	690,000 ppb	
4-chloro-3-methylphenol	180,000 ppb	(J)
n-nitrosodiphenylamine	380,000 ppb	
phenanthrene	230,000 ppb	
trimethyl benzenelsomer	1,500,000 ppb	
unknown hydrocarbon	30,730,000 ppb	
unknown	11,120,000 ppb	

MWH-021

naphthalene	670,000 ppb	
4-chloro-3-methylphenol	200,000 ppb	(J)
phenanthrene	250,000 ppb	
pyrene	42,000 ppb	
chrysene	4000 ppb	
bis(2-ethylhexyl) phthalate	190,000 ppb	
di-n-octyl-phthalate	140,000 ppb	
unknown hydrocarbon	33,180,000 ppb	
unknown	3,000,000 ppb	

H. Overall GC/MS Performance

The instrument's overall performance on the day of analysis was good. The average RFs for the SPCCs were well above 0.05.

V. PESTICIDE/PCB ANALYSIS

A. Initial Calibration

There were no problems associated with the initial calibration. The data is acceptable.

B. Continuing Calibration

There were no problems associated with the continuing calibration. The data is acceptable.

C. Surrogate Spike Analysis

The required surrogate spike analysis was performed. All recoveries are within quality control limits (24-154%).

D. Matrix Spike Analysis

The required matrix spike and matrix spike duplicate analyses were performed. There were poor recoveries

due to matrix interference. The lab performed a blank spike analysis to show that this was not a laboratory problem. All recoveries are within quality control limits.

E. Blank Analysis

No target nor non target compounds were detected in the method blank.

F. Sample Results

Aldrin was detected at a concentration of 500 ppb in sample MWH-020.

G. Overall GC Performance

The instrument's performance on the day of analysis was good. The retention time shift for DBC was less than two (2) percent

VI. METAL ANALYSIS

The EP Tox protocol was performed on sample MWH-019. Total priority pollutant metals were determined for MWH-020, MWH-021, MWH-022.

A. Initial and Continuing Calibration

There were no problems noted with the initial or continuing calibration. All data is within quality control limits.

B. Method Blank

There were no target compounds detected above the method detection limit (MDL) in the method blank. The data is acceptable.

C. Duplicate Sample Analysis

The required duplicate analysis was performed; the data is within quality control limits.

D. Matrix Spike Analysis

The required matrix spike analysis was performed. The reported data is within quality control limits (75-125%).

E. ICP Interference Check Sample Analysis

AnalytiKEM performed the ICP check sample analysis with the appropriate check sample obtained from Inorganic

Ventures, Inc. The results of the analysis fell within the quality control limits of +/- 20% of the true value of the analytes present in the interference check sample.

J = estimated

F. Sample Results

The following chart summarizes the metals' results. The concentrations are in parts per billion (ppb).

					PCB
MWH-019			drum sludge		
barium	440	(J)			—
MWH-020					
arsenic	10,000	(J)	oil sample from tank #10 EP TOX	>5	.5ppm
cadmium	6300	(J)		>1	
chromium	120,000			>5	
copper	350,000			—	
lead	940,000			>5	
mercury	190	(J)		— ?	
zinc	1,000,000				
MWH-021			X-326 processed waste from P-3		
arsenic	10,000			>5	—
cadmium	8200			>1	
chromium	51,000			>5	
copper	130,000			>~~8~~	
lead	250,000				
mercury	310			>.2	
nickel	47,000				
selenium	370	(J)			
zinc	460,000				
MWH-022			water discharge to CCMUA		
arsenic	33				
barium	480				—
chromium	170				
iron	190,000				
lead	130				
manganese	4200				
mercury	0.~~27~~	—			
nickel	410				
zinc	3900				

VII. PHENOL AND CYANIDE ANALYSIS

The laboratory performed a DI water spike for the phenol analysis because of insufficient sample volume. There was a small explosion during sample preparation for the phenol analysis.

The data submitted for these samples are reliable based on the information submitted by the lab.

CONCLUSIONS

I. GENERAL REQUIREMENTS

The test report is assembled in the proper format with all required data submitted. The Chain of Custody is adequate.

II. HOLDING TIMES

The holding time for the total cyanide analysis (MWH-020 and MWH-021) was exceeded by one day. The remainder of the holding times have been met.

III. VOLATILE ORGANIC ANALYSIS

The results for methylene chloride in samples MWH-020 and MWH-021 have been qualified. The remainder of the data is acceptable and may be used for its intended purpose.

IV. BASE NEUTRAL/ACID EXTRACTABLE ANALYSIS

The negative results for benzidine in samples MWH-020 and MWH-021 have been rejected since the RFs for this compound is less than 0.05. The remainder of the data is acceptable and may be used for its intended purpose.

V. PESTICIDE/PCB ANALYSIS

The data is reliable and may be used for its intended purpose.

VI. METAL ANALYSIS

The data is reliable and may be used for its intended purpose.

VII. PHENOL AND CYANIDE ANALYSIS

The results for the cyanide analysis have been qualified since the holding time was exceeded. The data for the phenol analysis is reliable and may be used for its intended purpose.

VIII. INVOICE PAYMENT

I recommend that 20 percent of the invoice payment for the total cyanide analysis ($16.00) be withheld in accordance with section 5.29.3.2c of the Laboratory Services Contract, X-195. I recommend full payment of the 80

percent invoice amount.

MWH

c.
QA Staff
Case File

Flowen Oil Delaware Valley

PA BSGF

Incoming Waste: Sampling Episode with BCTS **Date:** 10/3/89

Weather: Part Sun **Wind Direction:** SW **Wind Speed:** 5-10 mph **Temp.** 63° F

For BCTS { Dale Akinson, Mike Hrusel*, Dawn Schinger, Brett Reburn

arrived on site 0930

Material	Source	Waste Description	Date	Comments
incoming waste	Tank #10 15000 gal waste Storage Tank	unprocessed waste oil/water/sludge	10/3/89 1005 to 1120	Flowen Data ~60-70% oil ~10% water ~20% solids sludge Cl = 5112 ppm on oil Sample # MWH 020 analyze for PP and PCB
Processed waste sludge	Drum on pad material "Solid"/liquid	"Solid/liquid" sludge from solid bowl Centrifuge X-728	Drum dated 9/28/89 Sampled 10/3 @1025	X-728 process Sludge BCTS Sample # MWH 019 analyze for metals
Process waste oil	Tank P-3 25000 gal	Processed waste oil after desludging X-726 waste oil	10/3/89 Sampled @ ~1215	X-726 processed waste oil BCTS Sample # MWH021 analyze for PP and PCB ~30% oil ~40% ~20 emulsion ~10% solid } Cl = ~8000 ppm Flowen Lab data
water discharge to CCMA	ultra filter Sump discharge	processed waste water after desludging, deoiling water being discharged direct to CCMA	10/3/89 Sample @ ~1250	Sampled discharge water BCTS sample # MWH022 analyze for metals.

Comments: * Mike Hrusel BCTS Coordinator for this Sampling

TRANSACTION CODE	S C	BATCH NUMBER	NEW TCH
47	0		

STATE OF NEW JERSEY

FISCAL YEAR	TRAN CODE	DATE	DOC TYP	DOCUMENT NUMBER	REJECT LOCATOR
90	09	21 89	I	254257	

AGENCY PURCHASE ORDER/INVOICE

VENDOR STATUS

BLANK - NO CHANGE
1 - NEW VENDOR
2 - ADDRESS CHANGE
3 - LOCATION CODE
4 - NEW VENDOR AND LOCATION
5 - VENDOR NO CORRECTION

(9) ACCOUNT NUMBER ORGANIZATION	FUND	PROGRAM	OBJECT	(10) COST CENTER	(11) PROJECT ACTIVITY	(12) EXTENDED NO	(13) TOTAL AMOUNT	(14) AGENCY P.O. NUMBER	(15) (16) OBLIGATION NUMBER
4910	203	2300/0	36	MPC	GDC		$ 7,245.00	20122	A 31416

VENDOR NAME AND ADDRESS

(7) NAME STREET CITY STATE ZIP CODE

ANALYTIKEM INC
28 SPRINGDALE RD
CHERRY HILL NJ 08003

Split copy

CONTACT FOR INFORMATION (NAME AND PHONE NO.)

MICHAEL HRUSE (609) 633-0708

IF DIRECT PURCHASE OR SPECIAL PROCUREMENT INDICATE DATE QUOTATION RECEIVED

BILL TO: ENTER COMPLETE NAME AND ADDRESS

NJ DEPT OF ENVIRONMENTAL PROTECTION
DIV OF HAZARDOUS WASTE MGMT
CN 028 - 401 E STATE ST
TRENTON NJ 08625
ATTN MANAGEMENT SERVICES/6TH FLOOR

SHIP FOB DESTINATION TO:

NJ DEPT OF ENVIRONMENTAL PROTECTION
DIV OF HAZARDOUS WASTE MGMT
CN 028 - 401 E STATE ST
TRENTON NJ 08625
ATTN JOHN H SKOVIAK/5TH FLOOR

(18) COMMODITY CODE	VENDOR INVOICE NUMBER	(19) (20) VENDOR IDENTIFICATION NUMBER	CONTRACT NUMBER
79432		222190840 0	A 82053

INSTRUCTIONS TO VENDOR: (1) YOU MUST USE THE ATTACHED STATE INVOICE FORM (ORIGINAL AND DUPLICATE) FOR BILLING PURPOSES (2) IF THIS IS A PARTIAL BILLING YOU MUST SUBMIT BALANCES ON SEPARATE STATE INVOICE FORMS (3) ENCLOSE PACKING SLIP WITH SHIPMENTS (4) SHOW OBLIGATION NUMBER AND ACCOUNT NUMBER ON ALL BILLS OF LADING INVOICES AND CORRESPONDENCE (5) ADDRESS ALL CORRESPONDENCE TO THE STATE AGENCY INDICATED ABOVE

CASH DISCOUNT

ITEM NO.	QUANTITY	UNIT	COMMODITY CODE AND ITEM DESCRIPTION (All descriptions must begin with appropriate 5 or 11 digit commodity code.)	UNIT PRICE	AMOUNT
1	2	EA	PURGEABLE ORGANICS-(GC/MS)	$ 400.00	$ 800.00
2	2	EA	TOTAL USEPA PRIORITY POLLUTANTS	2315.00	4630.00
3	1	EA	PH DETERMINATION	5.00	5.00
4	1	EA	EXTRACTION PROCEDURE TOXICITY (HEAVY METALS)	400.00	400.00
5	1	EA	TOTAL PRIORITY POLLUTANT METALS PLUS BARIUM, IRON, AND MANGANESE	465.00	465.00
			15% INCREASE FOR PROCESS WASTES		945.00
			"I CERTIFY THAT THIS ENCUMBRANCE OF FEDERAL GRANT FUNDS CONFORMS TO THE RCRA SUBTITLE C GRANT ASSISTANCE NO. D002253-90-0 AS AWARDED BY THE FEDERAL AGENCY. AMENDMENTS HAVE BEEN REQUESTED, WHERE NECESSARY, TO REVISE THE ORIGINAL GRANT AWARD TO CONFORM TO THIS REQUEST."		
			John H. Skovi[illegible] 9/21/89 SIGNATURE DATE		
			IMPORTANT: This purchase order contains Prompt Payment information.		

TOTAL $ 7,245.00

AGENCY APPROVAL: Signature affixed to this purchase order serves as certification 1) that items purchased under DPA authorization are not currently available under the provisions of a current State contract or from the State Distribution Center, and 2) that funds required and authorized for this purpose are obligated and available. Unauthorized use subject to prosecution

Robert C. Ciesinski (AUTHORIZED SIGNATURE)

Sup. P.D.S. (TITLE)

(PRINTED OR TYPED NAME OF AUTHORIZING EMPLOYEE)

9/25/89 (DATE)

TYPE OF PURCHASE AUTHORIZATION (Check one)

- [ ] TERM CONTRACT AUTHORIZATION
- [ ] BLANKET ORDER
- [ ] DIRECT PURCHASE AUTHORIZATION
- [ ] SPECIAL PROCUREMENT WAIVER AUTHORIZATION

This transaction is authorized by the Director of Purchase and Property in accordance with the provisions of Chap. 107, P.L. 1985 as amended. The issuing Agency's Approval Officer's signature guarantees compliance with all provisions governing the Authorization granted by the Director. Type and number of authorization to be indicated in the space provided. Material delivered against this order is NOT subject to Federal Excise Taxes. Excise Tax Exemption Certificate No. 22-75-0050K. Exemption Certificate will be submitted on request. N.J.S.A. 54:32B-1 et seq. exempts all materials sold N.J. State Agencies from Sales or Use Taxes. Do not include them in your price. The parties in this contract do hereby agree that the provisions of N.J.S.A. 10:2-1 et seq. dealing with discrimination in employment on public contracts, and the Rules and Regulations promulgated pursuant thereunto are hereby made a part of this contract and are binding upon them.

COMMERCE SET-ASIDE TYPE

$		M		F	

PB2-AR47 (9 87)

VENDOR COPY

9/21/89

Form DEP-011
2/83

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIPT FOR PROPERTY

UNIT DESIGNATION OF RECEIVING HEADQUARTERS: DHWM Bureau of Compliance / Tech Serv.	COMPLAINT OR CASE NR (If any):
LOCATION: ReinTech Camden NJ	
NAME OF PERSON FROM WHOM PROPERTY IS OBTAINED: ☐ OWNER ☒ OTHER Larry Feinson	ADDRESS (Include ZIP Code): 1800 Carman Ave Camden NJ
LOCATION OF PROPERTY:	
PURPOSE FOR WHICH OBTAINED: Samples for Analysis	

ITEM NR	QUANTITY	DESCRIPTION OF ARTICLES (Include Model, Serial Nr, Identifying marks, condition, and value, when appropriate)
1	1	250 ml amber glass bottle filled with black sludge assigned DEP sample # MWH-019
2	1	950 ml amber glass bottle filled with black liquid assigned DEP sample # MWH-020
3	1	950 ml amber glass bottle filled with black liquid assigned DEP sample # MWH-021
4	1	500 ml amber glass bottle filled with clear brown aqueous liquid assigned DEP sample # MWH-022
		← Final Item →

CHAIN OF CUSTODY

ITEM NR	Date	Time	RELINQUISHED BY	RECEIVED BY	PURPOSE OF CHANGE OF CUSTODY
1 ↓ 4	10/31/89	1250	TYPED NAME: Larry Feinson SIGNATURE: Larry Feinson	TYPED NAME: Michael W Hruse SIGNATURE: Michael W. Hruse	Samples for Analysis
1 ↓ 4	10/31/89	1530	TYPED NAME: Michael W Hruse SIGNATURE: Michael W Hruse	TYPED NAME: Kim Jones SIGNATURE: Kim Jones	Sampler to lab
			TYPED NAME: SIGNATURE:	TYPED NAME: SIGNATURE:	
			TYPED NAME: SIGNATURE:	TYPED NAME: SIGNATURE:	

Form DEP-060
10/86

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD WITH SHUTTLE

Use One Form for Each Sample — *Shaded Areas for DEP Field Use Only*

NAME OF UNIT AND ADDRESS: [illegible]

Name of Person(s) Preparing Container(s) for Sample Shuttle
Name [illegible] Title [illegible] Agency [illegible]
Name Title Agency

Date above-mentioned Person(s) Placed Container(s) in Sample Shuttle: 10/2/89 | Military Time: 1110 | Laboratory Affixed Sample Shuttle Seal No.: 5677-78

Name of Person(s) Breaking Laboratory Seal on Sample Shuttle and Taking Field Sample
Name: D. Madkison Title: Sr. Env. Spec
Name: [illegible] Title: Sr. Env. Spec
Name Title

Date Laboratory Sample Shuttle Seal No. Broken: 10/3/89 | Time (Mil) Seal Broken and Sampling Begun: 1003

FIELD SAMPLE NUMBER	CONTAINER NUMBER(S)	VOLUME OF CONTAINERS	DESCRIPTION OF SAMPLE
MWH-219	1	250 ml	Black liquid (sludge)

LAB CONTROL NO.

Date Sampling Completed & Field Seal Affixed to Sample Shuttle: 10/2/89 | Military Time: 1235 | Field Affixed Sample Shuttle Seal No.: 5664-4

Laboratory Person Breaking Field Seal on Sample Shuttle & Accepting Responsibility for Sample
Name Title

Field Sample Seal No. | Date Broken / / | Military Time Seal Broken

SAMPLE RELINQUISHED BY	SAMPLE RECEIVED BY	DATE	TIME	REASON FOR CHANGE OF CUSTODY
[illegible]	[illegible]	10/2/89	1010	Bottle pick up
[illegible]	[illegible]	10/3/89	[illegible]	Sample [illegible]

COPIES: *Gold - Container/Shuttle Preparation Receipt* *Pink - Field Sampler Receipt* *Yellow - Analyst Chain of Custody* *White - Sample Custodians Chain of Custody*

Form DEP-060
10/86

N ERSEY DEPARTMENT OF ENVIRONMENTAL PRO CTION

CHAIN OF CUSTODY RECORD WITH SHUTTLE

Use One Form for Each Sample — *Shaded Areas for DEP Field Use Only*

NAME OF UNIT AND ADDRESS: NJ DEP BHWM 401 E State St Trenton NJ

Name of Person(s) Preparing Container(s) for Sample Shuttle
Name: Bill Cuneo Title: F.S. Supr. Agency: Analyt K-M
Name: Title: Agency:

Date above-mentioned Person(s) Placed Container(s) in Sample Shuttle: 10 / 2 / 89 | Military Time: 1000 | Laboratory Affixed Sample Shuttle Seal No.: 5877-78

Name of Person(s) Breaking Laboratory Seal on Sample Shuttle and Taking Field Sample
Name: D. Adkinson Title: Sr. Env. Spec.
Name: M. House Title: Sr. Env. Spec.
Name: Title:

Date Laboratory Sample Shuttle Seal [redacted] n: 10 / 3 / 89 | Time (Mil) Seal Broken and Sampling Begun: 1003

FIELD SAMPLE [redacted]	[redacted]TAINER NUMBER(S)	VOLUME OF CONTAINERS	DESCRIPTION OF SAMPLE
MWH-020	1	950ml	Black liquid

LAB CONTROL NO.

Date Sampling Completed & Field Seal Affixed to Sample Shuttle: 10 / 3 / 89 | Military Time: 1235 | Field Affixed Sample Shuttle Seal No.: 5868A 5869A

Laboratory Person Breaking Field Seal on Sample Shuttle & Accepting Responsibility for Sample
Name: Title:

Field Sample Seal No.: | Date Broken: / / | Military Time Seal Broken:

SAMPLE RELINQUISHED BY	SAMPLE RECEIVED BY	DATE	TIME	REASON FOR CHANGE OF CUSTODY
[illegible]	[illegible]	10-2-89	1810	Bottle pickup
[illegible]	[illegible]	10-3-89	1530	[illegible]

COPIES: Gold - Container/Shuttle Preparation Receipt; Yellow - Analyst Chain of Custody; Pink - Field Sampler Receipt; White - Sample Custodians Chain of Custody

Form DEP-060
10/86

N ERSEY DEPARTMENT OF ENVIRONMENTAL PRO TION

CHAIN OF CUSTODY RECORD WITH SHUTTLE

Use One Form for Each Sample — *Shaded Areas for DEP Field Use Only*

NAME OF UNIT AND ADDRESS [illegible]

Name of Person(s) Preparing Container(s) for Sample Shuttle
Name [illegible] Title [illegible] Agency [illegible]
Name Title Agency

Date above-mentioned Person(s) Placed Container(s) in Sample Shuttle 10/2/89 | Military Time [illegible] | Laboratory Affixed Sample Shuttle Seal No. 5877-78

Name of Person(s) Breaking Laboratory Seal on Sample Shuttle and Taking Field Sample
Name M. Hurd Title Sr. Env. Spec.
Name D. Adkison Title Sr. Env. Spec.
Title

Date Laboratory Sample Shuttle Seal [illegible] 10/3/89 | Time (Mil) Seal Broken and Sampling Begun 1235

FIELD SAMPLE [illegible]	CONTAINER NUMBER(S)	VOLUME OF CONTAINERS	DESCRIPTION OF SAMPLE
MW4-021	1	950ml	Black liquid

LAB CONTROL NO.

Date Sampling Completed & Field Seal Affixed to Sample Shuttle 10/3/89 | Military Time 1235 | Field Affixed Sample Shuttle Seal No. 5568 A, 5569 A

Laboratory Person Breaking Field Seal on Sample Shuttle & Accepting Responsibility for Sample
Name Title

Field Sample Seal No. | Date Broken / / | Military Time Seal Broken

SAMPLE RELINQUISHED BY	SAMPLE RECEIVED BY	DATE	TIME	REASON FOR CHANGE OF CUSTODY
[illegible]	[illegible]	10-2-89	1610	Bottle pick up
[illegible]	[illegible]	10-3-89	1330	Sample to lab

COPIES: *Gold - Container/Shuttle Preparation Receipt* *Pink - Field Sampler Receipt*
Yellow - Analyst Chain of Custody *White - Sample Custodians Chain of Custody*

Form DEP-060
10/86

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD WITH SHUTTLE

Use One Form for Each Sample — *Shaded Areas for DEP Field Use Only*

NAME OF UNIT AND ADDRESS: NJDEP BWM 401 E State St Trenton NJ

Name of Person(s) Preparing Container(s) for Sample Shuttle
Name: Bill Concro Title: F.S. Supr Agency: AnalytiKEM
Name: Title: Agency:

Date above-mentioned Person(s) Placed Container(s) in Sample Shuttle: 10/2/89 | Military Time: 1000 | Laboratory Affixed Sample Shuttle Seal No.: 5877-78

Name of Person(s) Breaking Laboratory Seal on Sample Shuttle and Taking Field Sample
Name: D. Adkisson Title: Sr Env Spec
Name: M. House Title: Sr Env Spec
Title:

Date Laboratory Sample Shuttle Seal Broken: 10/3/89 | Time (Mil) Seal Broken and Sampling Begun: 1123

FIELD SAMPLE NUMBER	CONTAINER NUMBER(S)	VOLUME OF CONTAINERS	DESCRIPTION OF SAMPLE
MWN-022	1	500ml	clear brown aqueous liquid

LAB CONTROL NO.

Date Sampling Completed & Field Seal Affixed to Sample Shuttle: 10/3/89 | Military Time: 1235 | Field Affixed Sample Shuttle Seal No.: 5868-A 5869-A

Laboratory Person Breaking Field Seal on Sample Shuttle & Accepting Responsibility for Sample
Name: Title:

Field Sample Seal No.: | Date Broken: / / | Military Time Seal Broken:

SAMPLE RELINQUISHED BY	SAMPLE RECEIVED BY	DATE	TIME	REASON FOR CHANGE OF CUSTODY
[illegible]	M. House	10-2-89	1640	Bottle pick up
M. House	[illegible]	10-3-89	1530	Sample to lab

COPIES: Gold - Container/Shuttle Preparation Receipt; Yellow - Analyst Chain of Custody; Pink - Field Sampler Receipt; White - Sample Custodians Chain of Custody

Form DEP-059
10/86

NI RSEY DEPARTMENT OF ENVIRONMENTAL PR TION

SAMPLE ANALYSIS REQUEST FORM

NJDEP File # _____

SAMPLE LOCATION

NAME OF FACILITY/ COMPANY/PERSON: REMTECH	CODE	MAILING ADDRESS
SAMPLE LOCATION		

SAMPLE COLLECTOR

SAMPLER(S) Name: Michael [illegible]	DIVISION: DHWM		
Name: [illegible]	CONTRACT #: X-195	Task #: VII	Report Format: 1B

SAMPLE IDENTIFICATION

NJDEP SAMPLE NO.: Field Blank	SAMPLING DATE: 10/3/89	ABSCISSA (Longitude): N/A
SAMPLE POINT ID:	TIME (MIL) SAMPLING BEGAN: 11:13 am	ORDINATE (Latitude): N/A
SAMPLE SOURCE CODE:	TIME (MIL) SAMPLING FINISHED: 12:35 pm	ELEVATION: N/A
REFERENCE POINT:		

SAMPLING PROCESS

COLLECTION METHOD	Code: N/A	Other:	SAMPLE TYPE: Code: Lab Water
TYPE OF SAMPLER	Code: N/A	Other:	SAMPLE MATRIX: Code: Aqueous
DESCRIPTION: DT WATER			

FIELD MEASUREMENTS

SAMPLE TEMP. °C	PARAMETER	PARAMETER	PARAMETER
AIR TEMP. °C	VALUE	VALUE	VALUE
WEATHER			

CHAIN-OF-CUSTODY IMPLEMENTED ☒ YES ☐ NO

PRESERVATION CODE(S): 4° C

REQUESTED ANALYSIS(ES)

PARAMETERS (by Compound or Group of Compounds)	CONTAINER NUMBER	DETECTION LIMIT (digits/units)	EMERG.	NON-EMERG. (Check One)
Volatile Organics	3	—		✓

ANALYSIS(ES) AUTHORIZED BY: [illegible]

TITLE: [illegible]

ANALYZING LABORATORY

CONTRACT LAB NAME: Analytikon	PERSON ACCEPTING SAMPLE: Kim-[illegible]	TITLE	
LAB ID #	LAB CONTROL #	DATE	TIME (MIL)

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10/86

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

SAMPLE ANALYSIS REQUEST FORM

NJDEP File # _____

SAMPLE LOCATION

NAME OF FACILITY/ COMPANY/PERSON	REMTECH	CODE	MAILING ADDRESS
SAMPLE LOCATION	—		

SAMPLE COLLECTOR

SAMPLER(S) Name	Michael Hruse	DIVISION	Hazardous Waste Management		
Name	Dale Adkisson	CONTRACT #	X-195	Task # VII	Report Format 1B

SAMPLE IDENTIFICATION

NJDEP SAMPLE NO.	Trip Blank	SAMPLING DATE	10/3/89	ABSCISSA (Longitude)	N/A
SAMPLE POINT ID	—	TIME (MIL) SAMPLING BEGAN	10:03	ORDINATE (Latitude)	N/A
SAMPLE SOURCE CODE	—	TIME (MIL) SAMPLING FINISHED	12:35	ELEVATION	N/A
REFERENCE POINT	—				

SAMPLING PROCESS

COLLECTION METHOD	Code	SAMPLE TYPE	Code LAB Other WATER
TYPE OF SAMPLER	Code N/A	SAMPLE MATRIX	Code Other Aqueous
DESCRIPTION	DI H_2O		

FIELD MEASUREMENTS

SAMPLE TEMP. °C	PARAMETER	PARAMETER	PARAMETER
AIR TEMP °C	VALUE	VALUE	VALUE
WEATHER			

CHAIN-OF-CUSTODY IMPLEMENTED ☒ YES ☐ NO

PRESERVATION CODE(S) 4° C

REQUESTED ANALYSIS(ES)

PARAMETERS (by Compound or Group of Compounds)	CONTAINER NUMBER	DETECTION LIMIT (digits/units)	EMERG.	NON-EMERG. (Check One)
Volatile Organics	4	—		✓

ANALYSIS(ES) AUTHORIZED BY [illegible] TITLE [illegible] Spec

ANALYZING LABORATORY

CONTRACT LAB NAME AnalytiKEM	PERSON ACCEPTING SAMPLE [illegible]		TITLE
LAB ID #	LAB CONTROL #	DATE	TIME (MIL)

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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

SAMPLE ANALYSIS REQUEST FORM

NJDEP File # _____

SAMPLE LOCATION

NAME OF FACILITY/ COMPANY/PERSON	REMTECH	CODE	MAILING ADDRESS
SAMPLE LOCATION			

SAMPLE COLLECTOR

SAMPLER(S) Name	Michael Hruse	DIVISION	HAZARDOUS Waste Management		
Name	Dale Adkisson	CONTRACT #	X-195	Task # XII	Report Format 1B

SAMPLE IDENTIFICATION

NJDEP SAMPLE NO.	MWH-019	SAMPLING DATE	10/3/89	ABSCISSA (Longitude)	N/A
SAMPLE POINT ID		TIME (MIL) SAMPLING BEGAN	10:03	ORDINATE (Latitude)	N/A
SAMPLE SOURCE CODE		TIME (MIL) SAMPLING FINISHED	12:35	ELEVATION	N/A
REFERENCE POINT					

SAMPLING PROCESS

COLLECTION METHOD Code	Grab Sample	SAMPLE TYPE Code / Other	Sludge
TYPE OF SAMPLER Code	S.S. HAND TROWEL	SAMPLE MATRIX Code / Other	NON-Aqueous
DESCRIPTION	Black Viscous Material		

FIELD MEASUREMENTS

SAMPLE TEMP. °C	PARAMETER	PARAMETER	PARAMETER
AIR TEMP. 75° F °C	VALUE	VALUE	VALUE
WEATHER Sunny			

CHAIN-OF-CUSTODY IMPLEMENTED ☒ YES ☐ NO

PRESERVATION CODE(S) 4°C

REQUESTED ANALYSIS(ES)

PARAMETERS (by Compound or Group of Compounds)	CONTAINER NUMBER	DETECTION LIMIT (digits/units)	NON-EMERG.	EMERG. (Check One)
Extraction Procedure Toxicity Heavy Metals Only SW-846 Methodology	1			✓

ANALYSIS(ES) AUTHORIZED BY [illegible signature] TITLE [illegible]

ANALYZING LABORATORY

CONTRACT LAB NAME	AnalytiKEM	PERSON ACCEPTING SAMPLE	TITLE
LAB ID #	LAB CONTROL #	DATE	TIME (MIL)

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NJ ERSEY DEPARTMENT OF ENVIRONMENTAL PR CTION

NJDEP File # _____

SAMPLE ANALYSIS REQUEST FORM

SAMPLE LOCATION

NAME OF FACILITY/ COMPANY/PERSON: Remtech	CODE	MAILING ADDRESS
SAMPLE LOCATION		

SAMPLE COLLECTOR

SAMPLER(S) Name: Michael Hruse	DIVISION: Hazardous Waste Management		
Name: Dale Adkisson	CONTRACT #: X195	Task #: 7	Report Format: IB

SAMPLE IDENTIFICATION

NJDEP SAMPLE NO: MWH-020	SAMPLING DATE: 10/3/89	ABSCISSA (Longitude): N/A
SAMPLE POINT ID: —	TIME (MIL) SAMPLING BEGAN: 10:03	ORDINATE (Latitude): N/A
SAMPLE SOURCE CODE:	TIME (MIL) SAMPLING FINISHED: 12:35	ELEVATION: N/A
REFERENCE POINT:		

SAMPLING PROCESS

COLLECTION METHOD Code: G	SAMPLE TYPE Code: Non-Aqueous Other:
TYPE OF SAMPLER Code: Stainless steel Bacon Bomb	SAMPLE MATRIX Code: Non Aqueous Other:
DESCRIPTION: Black, oily	

FIELD MEASUREMENTS

SAMPLE TEMP. 4 °C	PARAMETER	PARAMETER	PARAMETER
AIR TEMP. 75 °F °C	VALUE	VALUE	VALUE
WEATHER: Sunny			

CHAIN-OF-CUSTODY IMPLEMENTED: ☒ YES ☐ NO

PRESERVATION CODE(S)

REQUESTED ANALYSIS(ES)

PARAMETERS (by Compound or Group of Compounds)	CONTAINER NUMBER	DETECTION LIMIT (digits/units)	EMERG.	NON-EMERG. (Check One)
Total Priority Pollutants	1	—		✓

ANALYSIS(ES) AUTHORIZED BY: Michael H. Hruse

TITLE: [illegible]

ANALYZING LABORATORY

CONTRACT LAB NAME: Analyt Kem	PERSON ACCEPTING SAMPLE: [illegible]	TITLE
LAB ID #	LAB CONTROL #	DATE	TIME (MIL)

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NF RSEY DEPARTMENT OF ENVIRONMENTAL PR TION

NJDEP File #

SAMPLE ANALYSIS REQUEST FORM

SAMPLE LOCATION

NAME OF FACILITY/ COMPANY/PERSON	RENTECH	CODE	MAILING ADDRESS
SAMPLE LOCATION			

SAMPLE COLLECTOR

SAMPLER(S) Name	Michael Hrose	DIVISION	DHWM
Name	[illegible]	CONTRACT # V-195	Task # VII	Report Format 1B

SAMPLE IDENTIFICATION

NJDEP SAMPLE NO. [illegible]	SAMPLING DATE 10/3/89	ABSCISSA (Longitude)
SAMPLE POINT ID	TIME (MIL) SAMPLING BEGAN [illegible]	ORDINATE (Latitude)
SAMPLE SOURCE CODE	TIME (MIL) SAMPLING FINISHED [illegible]	ELEVATION
REFERENCE POINT		

SAMPLING PROCESS

COLLECTION METHOD	Code GRAB SAMPLE Other	SAMPLE TYPE	Code Other
TYPE OF SAMPLER	Code Spigot Other	SAMPLE MATRIX	Code Non Aqueous Other
DESCRIPTION	Black [illegible]		

FIELD MEASUREMENTS

SAMPLE TEMP. °C	PARAMETER	PARAMETER	PARAMETER
AIR TEMP. 75 °F	VALUE	VALUE	VALUE
WEATHER Sunny			

CHAIN-OF-CUSTODY IMPLEMENTED ☒ YES ☐ NO

PRESERVATION CODE(S) 4 C

REQUESTED ANALYSIS(ES)

PARAMETERS (by Compound or Group of Compounds)	CONTAINER NUMBER	DETECTION LIMIT (digits/units)	EMERG.	NON-EMERG. (Check One)
Total Petroleum Hydrocarbons	[illegible]			✓

ANALYSIS(ES) AUTHORIZED BY [illegible] TITLE [illegible]

ANALYZING LABORATORY

CONTRACT LAB NAME [illegible]	PERSON ACCEPTING SAMPLE [illegible]	TITLE	
LAB ID #	LAB CONTROL #	DATE	TIME (MIL)

Form DEP-059
10/86

NF RSEY DEPARTMENT OF ENVIRONMENTAL PR TION

SAMPLE ANALYSIS REQUEST FORM

NJDEP File # _____

SAMPLE LOCATION

NAME OF FACILITY/ COMPANY/PERSON	CODE	MAILING ADDRESS
SAMPLE LOCATION		

SAMPLE COLLECTOR

SAMPLER(S) Name	DIVISION		
Name	CONTRACT #	Task #	Report Format

SAMPLE IDENTIFICATION

NJDEP SAMPLE NO.	SAMPLING DATE	ABSCISSA (Longitude)
SAMPLE POINT ID	TIME (MIL) SAMPLING BEGAN	ORDINATE (Latitude)
SAMPLE SOURCE CODE	TIME (MIL) SAMPLING FINISHED	ELEVATION
REFERENCE POINT		

SAMPLING PROCESS

COLLECTION METHOD	Code	Other	SAMPLE TYPE	Code	Other
TYPE OF SAMPLER	Code	Other	SAMPLE MATRIX	Code	Other
DESCRIPTION					

FIELD MEASUREMENTS

SAMPLE TEMP.	PARAMETER	PARAMETER	PARAMETER
AIR TEMP.	VALUE	VALUE	VALUE
WEATHER			

CHAIN-OF-CUSTODY IMPLEMENTED ☐ YES ☐ NO

PRESERVATION CODE(S)

REQUESTED ANALYSIS(ES)

PARAMETERS (by Compound or Group of Compounds)	CONTAINER NUMBER	DETECTION LIMIT (digits/units)	NON EMERG.	EMERG. (Check One)

ANALYSIS(ES) AUTHORIZED BY

TITLE

ANALYZING LABORATORY

CONTRACT LAB NAME	PERSON ACCEPTING SAMPLE	TITLE	
LAB ID #	LAB CONTROL #	DATE	TIME (MIL)

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10/82

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

NO. 1

FIELD SAMPLING DATA SHEET

DATE 10/3/89

HW/EF # ___ - ___ ___ ___

E.P.A. ID # 98D536577

CASE NAME Remtech (Flower Oil)

TIME OF SAMPLING 10:03 HOURS

LOCATION 120 Carmen Ave.
Canda, NJ

COLLECTED BY: Mike House/Dale Adkisson

RECORDED BY: Reburn

CONTACT:

FIELD SAMPLE NO. A Field Blank

B

SPECIFIC SAMPLING SITE:

- ☐ DRUM #
- ☐ TANK TRAILER #
- ☐ STATIONARY TANK #
- ☐ HORIZONTAL ☐ VERTICAL ☐ UNDERGROUND
- ☐ TOP ☐ MIDDLE ☐ BOTTOM
- ☐ OTHER

SAMPLING CONTAINER:

- ☒ GLASS ☐ PLASTIC
- ☐ OTHER

CONTAINER VOLUME:

- ☐ PINT ☐ QUART
- ☒ OTHER ___ OZ./ 40 ML.

CONTAINER FILLED: ☒ YES ☐ NO

CHAIN OF CUSTODY INITIATED

☒ YES ☐ NO

TYPE OF SAMPLE:

- ☐ LIQUID ☐ SLUDGE
- ☐ SOLID ☐ SOIL
- ☒ OTHER DI Water

CHARACTERISTICS OF SAMPLE:

- ☐ TURBID ☐ TRANSPARENT
- COLOR DI Water
- ODOR
- OTHER

SUSPECTED SUBSTANCE(S):

Volitalo Organics

ADDITIONAL INFORMATION:

Field Blank

3 Bottles at
40ml each

Form DWM-022
10/82

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

NO. 2

FIELD SAMPLING DATA SHEET

DATE 10/3/89

HW/EF # ___ - ___ ___ ___

E.P.A. ID # 980 536 577

CASE NAME Remtech (Flower Oil)

LOCATION 1900 Carman Ave
Camden, NJ

CONTACT:

TIME OF SAMPLING _____ HOURS

COLLECTED BY: Lab (Analytikon

RECORDED BY: Rebuin

FIELD SAMPLE NO. A Trip Blank

B

SPECIFIC SAMPLING SITE:

- ☐ DRUM #
- ☐ TANK TRAILER #
- ☐ STATIONARY TANK #
- ☐ HORIZONTAL ☐ VERTICAL ☐ UNDERGROUND
- ☐ TOP ☐ MIDDLE ☐ BOTTOM
- ☐ OTHER

SAMPLING CONTAINER:

- ☒ GLASS ☐ PLASTIC
- ☐ OTHER

CONTAINER VOLUME:

- ☐ PINT ☐ QUART
- ☒ OTHER ____ OZ./ 40 ML.

CONTAINER FILLED: ☒ YES ☐ NO

CHAIN OF CUSTODY INITIATED

☐ YES ☐ NO

TYPE OF SAMPLE:

- ☐ LIQUID ☐ SLUDGE
- ☐ SOLID ☐ SOIL
- ☒ OTHER DI Water

CHARACTERISTICS OF SAMPLE:

- ☐ TURBID ☐ TRANSPARENT
- COLOR
- ODOR
- OTHER DI Water

SUSPECTED SUBSTANCE(S):

Volitale Organics

ADDITIONAL INFORMATION:

4 Bottles at
40 ml. each

Form DWM-022
10/82

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

NO. 3

FIELD SAMPLING DATA SHEET

DATE 10/3/89

HW/EF # ___ - ___ ___ ___

E.P.A. ID # 980536577

CASE NAME Rentech (Flora Oil)

TIME OF SAMPLING 10:25 HOURS

LOCATION 180 Carmen Ave
Camden, NJ

COLLECTED BY: Mike Hruse/Dale Atkinson

CONTACT:

RECORDED BY: Rebura

FIELD SAMPLE NO. A MWH-019

B

SPECIFIC SAMPLING SITE:

- [x] DRUM # X728; 9/23/89
- [ ] TANK TRAILER #
- [ ] STATIONARY TANK #
- [ ] HORIZONTAL [ ] VERTICAL [ ] UNDERGROUND
- [ ] TOP [ ] MIDDLE [ ] BOTTOM
- [ ] OTHER

SAMPLING CONTAINER:

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

CONTAINER VOLUME:

- [ ] PINT [ ] QUART
- [x] OTHER ___ OZ./ 250 ML.

CONTAINER FILLED: [x] YES [ ] NO

CHAIN OF CUSTODY INITIATED

[x] YES [ ] NO

TYPE OF SAMPLE:

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

CHARACTERISTICS OF SAMPLE:

- [ ] TURBID [ ] TRANSPARENT

COLOR Black

ODOR Tar

OTHER Some Liquid

SUSPECTED SUBSTANCE(S):

E.P. Tox

ADDITIONAL INFORMATION: (From Drum)
Waste Petroleum Mixture
X728; 9/23/89

Fibrous Material Appears to be included

Stainless Steel Scoop used to sample

Form DWM-022
10/82

NEW JE[illegible]Y DEPARTMENT OF ENVIRONMENTAL P[illegible]TECTION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

NO. 4

FIELD SAMPLING DATA SHEET

DATE 10/3/89

HW/EF # ___ - ___ ___ ___

E.P.A. ID # 980536577

CASE NAME Rentech (Flavor 0.1)

TIME OF SAMPLING 10:45 HOURS

LOCATION 1800 Carmen Ave
Camden, NJ

COLLECTED BY: M. Hr[illegible] / D. Adkisson

CONTACT:

RECORDED BY: Rebun

FIELD SAMPLE NO. A MWH-020

B

SPECIFIC SAMPLING SITE:

- ☐ DRUM #
- ☐ TANK TRAILER #
- ☒ STATIONARY TANK # 10
- ☐ HORIZONTAL ☒ VERTICAL ☐ UNDERGROUND
- ☐ TOP ☐ MIDDLE ☐ BOTTOM
- ☐ OTHER

SAMPLING CONTAINER:

- ☒ GLASS ☐ PLASTIC
- ☐ OTHER

CONTAINER VOLUME:

- ☐ PINT ☐ QUART
- ☒ OTHER ___ OZ./ 950 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
- OTHER

SUSPECTED SUBSTANCE(S):

Total Priority Pollutants

ADDITIONAL INFORMATION:

Oily

Split Sample with [illegible]

Stainless Steel Bacon B[illegible]

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10/82

NEW JE. .Y DEPARTMENT OF ENVIRONMENTAL P. ECTION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

NO. 5

FIELD SAMPLING DATA SHEET

DATE 10/3/99

HW/EF # ___ - ___ ___ ___

E.P.A. ID # 990536577

CASE NAME Rentech (Flynn Oil)

TIME OF SAMPLING 1:15 HOURS

LOCATION c/o Carmen Ave
Camden, NJ

COLLECTED BY: M. House / D. Mak...

RECORDED BY: Kelvin

CONTACT:

FIELD SAMPLE NO. A MWH-021

B

SPECIFIC SAMPLING SITE:

- [ ] DRUM #
- [ ] TANK TRAILER #
- [x] STATIONARY TANK # P3
- [ ] HORIZONTAL [ ] VERTICAL [ ] UNDERGROUND
- [ ] TOP [ ] MIDDLE [ ] BOTTOM
- [ ] OTHER

SAMPLING CONTAINER:

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

CONTAINER VOLUME:

- [x] PINT [ ] QUART
- [x] OTHER ___ OZ./ 950 ML.

CONTAINER FILLED: [x] YES [ ] NO

CHAIN OF CUSTODY INITIATED

- [x] YES [ ] NO

TYPE OF SAMPLE:

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

CHARACTERISTICS OF SAMPLE:

- [x] TURBID [ ] TRANSPARENT

COLOR Black

ODOR

OTHER Oily - slightly viscous

SUSPECTED SUBSTANCE(S):

Total Priority Pollutants

ADDITIONAL INFORMATION:

Tank # P3

Off Spec Material
Mixture of oil
and water

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10/82

NEW JE[illegible]Y DEPARTMENT OF ENVIRONMENTAL P[illegible]ECTION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

NO. 6

FIELD SAMPLING DATA SHEET

DATE 10/3/99

HW/EF # ___ - ___ ___ ___

E.P.A. ID # 980536577

CASE NAME Rentech (Flow Oil)

LOCATION 1900 Carmen Ave
Camden, NJ 08105

TIME OF SAMPLING [illegible] HOURS

COLLECTED BY: [illegible]

RECORDED BY: Reburn

CONTACT:

FIELD SAMPLE NO. A MWH-022

B

SPECIFIC SAMPLING SITE:

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

SAMPLING CONTAINER:

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

CONTAINER VOLUME:

- [ ] PINT [ ] QUART
- [x] OTHER ___ OZ./ Six ML.

CONTAINER FILLED: [x] YES [ ] NO

CHAIN OF CUSTODY INITIATED

[x] YES [ ] NO

TYPE OF SAMPLE:

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

CHARACTERISTICS OF SAMPLE:

- [x] TURBID [x] TRANSPARENT

COLOR Brown - slightly

ODOR

OTHER Foam on top
Hot; Approx

SUSPECTED SUBSTANCE(S):

Total Metals

ADDITIONAL INFORMATION:

X-726 Waste Water from petroleum processing

REFERENCE NO. 38

FISHER and SAMPSON

CIVIL ENGINEERS & LAND SURVEYORS

929 N. KING'S HIGHWAY (AT CHELTEN PARKWAY)

CHERRY HILL, N. J. 08034

THOMAS A. M. FISHER N.J.P.E. & L.S.
PA. P.E.
N.Y. P.E.
DEL. P.E.
ALFRED B. SAMPSON N.J.L.S.
THOMAS E. DAVIS N.J.L.S.

TELEPHONE
(609) 667-1100

ENVIRONMENTAL IMPACT STATEMENT

FOR

FLOWEN OIL DELAWARE VALLEY

1800 CARMAN STREET

CAMDEN, NEW JERSEY

Re: FS 8471
02-10-10

Dated: 20 March, 1981

ENVIRONMENT IMPACT STATEMENT FOR FLOWEN OIL DELAWARE VALLEY, 1800 CARMEN STREET, CAMDEN NEW JERSEY.

OBJECT

The object of this report is to provide an Environmental Impact Statement for the Special Waste Facilities to be provided at the Flowen Oil site in Camden, New Jersey.

PROCEDURE

The procedure to be used here is to recycle used hydrocarbon oil to provide a burnable low sulfur product similar to number 2 or 4 fuel oil for industrial consumers. The process uses steam heat, filters and centrifuges. The process is entirely mechanical. There is no chemical reaction and there are no chemical additives. Hereinafter, the ptential impact of construction and operation of the special waste facilties is discussed in relation to the following various items.

AIR QUALITY, WITHIN AND AROUND THE FACILITY, INCLUDING POTENTIAL DUST AND ODOR EMISSION

A. The quality of the air around the facility will be reduced. The boiler will develop 3000 pounds of steam per hour at 212°F, and will consume 25 gallons of flowen oil per hour producing about 2.5 million BTU per hour. Stack has terperature is estimated at 1100°F. Solids emission is estimated at 0.95 pounds per hour or 111 milligrams per cubic meter at 1139°F. The storage tanks will be vented to the atmosphere and will discharge at 25 CFM at a temperature of 20°F, plus or minus, the ambient temperature.

B. Surface and ground water quality will not be decreased. The entire plant will be covered with a concrete slab and surrounded by a perimeter bund and fence. The three (3) interior oil storage areas will also be surrounded by a bund providing sufficient volume for the largest tank plus 20 percent. Oils spilled or leased in the bunded containment area will be removed manually by portable pump. No direct connection to the storm system will be constructed from the area within the bund. Storm water falling without the bunded area, but inside the perimeter wall will be conducted through an interceptor and oil separator. When oil is observed in the downstream tanks, the upstream tanks will be pumped out.

WASTE PRODUCTS

The process will generate waste products. These will include

water, oil and non toxic sludge. Liquid wastes will be stored in tanks within the bund. Liquid waste will also be discharged through the sanitary sewer. This waste is expected to have a maximum C.O.D. of 940 m.g. per liter, an average daily C.O.D. of 245 m.g. per liter. The quantity is estimated at 1,200 gallons per day.

It is estimated that the process will generate one ton of solid waste per week. This will be stored in an exterior covered container. It will be removed weekly by a licenses scavenger contractor.

DOMESTIC WASTE

The employees will generate domestic waste estimated at 25 gallons per person per day or 200 gallons per day. This will be disposed of through the sanitary sewers leading from the administration building and mess room.

WATER SUPPLY, HYDROLOGY, GEOLOGY AND SOILS

Water supply, hydrology, geology and soils will have minimum changes since the construction involves tanks on a concrete slab with a bund, and the operation involves spill containment and separation of oil.

TOPOGRAPHY, VEGETATION, WILDLIFE, AQUATIC ORGANISMS AND ECOLOGY

Topography, vegetation, wildlife, aquatic organisms and the ecology will have minimum change. The 1888 Topography by C. C. Vermeule shows the area to border a marsh of the Cooper River.

The Engineering Soil Survey of New Jersey - Report 17 - Camden County 1955, classifies the land as AM24 - ig. These are unconsolidated statified alluvial deposits with interbedded silt, silty sand and clayey sand and gravel. The material is poorly sorted with fines distributed throughout the profile. Underlying formations lie close to the surface in many placed.

The drainage conditions are imperfect to good. Internal drainage is somewhat retarded by the percentage of fines. From 16 to 58 percent will pass the 200 sieve. The Highway Research Board Classification is A-2-4 or A-4. The depth to bedrock is in excess of 100 feet. The vegetation is uncultivated and noxious weeds, and the wildlife consists of a few birds.

There are no aquatic organism known to be on the site. The nearest water course is Cooper River about 1500 feet to the south.

DEMOGRAPHIC CONDITIONS

Demographic conditions are static. The land has never been

developed except for Carman Street. The other bounding streets are dedicated, but not physically open. The bounding properties are industrial with the R. M. Hollingshed Chemical Plant and other chemical plants to the west and small steel fabricators, and building suppliers to the north. The adjacent land on the south and east is unimproved, level, vacant with high grasses and noxious weeds.

AUTO TRAFFIC PATTERNS

Auto traffic patterns will increase. Two hundred (200) vehicle trips per day will be generated. These will use Federal Street, Carman Street, 18th Street and Admiral Wilson Boulevard.

Pedestrial traffic patterns will be increased by less than 100 trips per day. THese will involve employees and a few visitors. There is little pedestrial activity on Carman Street or 18th Street.

AMBIENT NOISE ENVIRONMENT

Ambient noise environment will be increased by the noise from the trucks and pedestrians. This noise will be intermittent and will not exceed 200 vehicles or 100 pedestrians per day. Some small noise will be created by the stack gases, however, this will be minimal. Some small noise will be created by pumps and centrifuges within the process building. However, the estimated DB level at 100 feet is 50.

VISUAL AND QUALITATIVE AESTHETICS

The construction phase will consist of clearing, grading, a slab on ground, concrete perimeter walls and drain lines.

Three (3) prefabricated one story buildings (largest 50 x 50) will be placed on the slab, together with 310,000 gallons of storage in 15,000 and 25,000 gallon tanks. The tank will be surrounded by a bund containment wall. The tanks will not exceed 15 feet in diameter or 30 feet in height and will be of painted steel construction.

The collection of a raw product (used lubricating oil) from the surrounding area (50 miles) and the consumption of this oil by industry to provide energy (after processing) will be a benefit to the environment. This process has been in use in the United Kingdom for five years after having been developed by a company operating in this business for over twenty years.

HISTORICAL AND ARCHEOLOGICAL RESOURCES

The site is level, and consists of fill. Test borings by Site Engineers, Voorhees Township, New Jersey, on 10 November, 1980, indicate 9 to 14 feet of fill on the site. We feel no significant

archeological or historical resources will be recovered from the site due to the fill material.

LISTING OF ADVERSE IMPACTS WHICH CANNOT BE AVOIDED BY FACILITY CONSTRUCTION OR OPERATION

1. Removal of existing foliage and habitat for wildlife.
2. Increased stack emissions.
3. Increased vehicular and pedestrial traffic.
4. Increased noise.
5. Increased oil spills.
6. Increased runoff.
7. Increased sanitary sewerage.

ADVERSE IMPACTS ON THE ENVIRONMENT WILL BE MINIMIZED DURING CONSTRUCTION AND OPERATION BY THE FOLLOWING

1. Paving of the site with a concrete slab.
2. Construction of bund containment walls around the storage tanks.
3. Construction of a curb around the perimeter of the site.
4. Instigation of a spill prevention and containment program.
5. Construction of trench drains, interceptor devices and oil separators.
6. Use of a portable pump to remove spills.
7. Provisions of am employees lunch room and dressing room.

LIST OF PERTINENT PUBLISHED INFORMATION

1. Flowen copyright by Waste Lubricating Oils Limited 1979.
2. U.S. Quadrangle Sheet Camden 1949.
3. Engineering Soil Survey of N.J. Report 17, 1955.

Thomas A. M. Fisher
N.J.P.E. #7113

Dated: 20 March, 1981

REFERENCE NO. 39

04-35

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF ENVIRONMENTAL QUALITY
SOLID WASTE ADMINISTRATION
32 EAST HANOVER STREET, TRENTON, N. J. 08625

JACK STANTON
DIRECTOR

LINO F. PEREIRA
ADMINISTRATOR
SOLID WASTE MANAGEMENT

CERTIFICATE OF APPROVED REGISTRATION AND ENGINEERING DESIGN APPROVAL

Under the provisions of N.J.S.A. 13:1E-1 et seq. known as the Solid Waste Management Act, this registration is hereby issued to:

Flowen Oils Delaware Valley, Inc.
Carman Street
Camden, NJ

for the purpose of operating a Waste Oil Recycling Plant

on Lot No. 1

Block No. 1431

in the municipality of Camden

county Camden

under Facility Registration No. 6408A

This approval is subject to compliance with all conditions specified herein and all regulations promulgated by the Department of Environmental Protection.

This approval shall not prejudice any claim the State may have to Riparian land nor does it permit the registrant to fill or alter, or allow to be filled or altered, in any way, lands that are deemed to be Riparian, Wetlands, stream encroachment or flood plains, or within the Coastal Area Facility Review Act (CAFRA) zone or allow the discharge of pollutants to waters of this State without first acquiring the necessary grants; permits or approvals from the Department of Environmental Protection or the U.S. Environmental Protection Agency.

June 10, 1981
DATE

Lino F. Pereira
LINO F. PEREIRA
ADMINISTRATOR
SOLID WASTE ADMINISTRATION

June 10, 1986
EXPIRATION DATE

Certificate of Approved Registration and Engineering Design Approval (hereinafter referred to as "permit") for Flowen Oils Delaware Valley, Inc., City of Camden, Camden County.

This Permit along with the Referenced Engineering Plans and Report, herein specified, shall constitute the sole Registration and Engineering Design Approval for the construction and operation of the Flowen Oils Delaware Valley, Inc., City of Camden, Camden County. Any Registration or Approval previously issued by the Solid Waste Administration or its predecessor agencies is hereby superseded.

The Permit is conditioned upon compliance with and implementation of the following:

1. Duty to comply

   The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Solid Waste Management Act and is grounds for enforcement action; for permit termination, revocation, and reissuance, or modification; or for denial of a permit renewal application.

2. Duty to reapply

   If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.

3. Duty to halt or reduce activity

   It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

4. Duty to mitigate

   The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

5. Proper operation and maintenance

   The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process

controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

6. Permit Actions

This permit may be modified, revoked, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

7. Property rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

8. Duty to provide information

The permittee shall furnish to the Administrator, within a reasonable time, any information which the Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Administrator, upon request, copies of records required to be kept by this permit.

9. Inspection and entry

The permittee, by acceptance of this permit, hereby agrees to allow the Commissioner, his or her employees, agents, representatives, or consultants to enter upon the permittee's premises where a regulated facility or activity is or may be located or conducted, or where records must be kept under the conditions of this permit for the purposes of inspection, sampling, copying, or photographing to insure compliance with any condition of this permit and/or Title 7, Chapter 26 of the New Jersey Administrative Code, and/or N.J.S.A. 13:1E-1 *et seq.*, the New Jersey Solid Waste Management Act.

10. Monitoring and records

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

(b) The permi: ee shall retain records of .ll monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period may be extended by request of the Administrator at any time.

(c) Records of monitoring information shall include:

(i) the date, exact place, and time of sampling or measurements;

(ii) the individual(s) who performed the sampling or measurements;

(iii) the date(s) analyses were performed;

(iv) the individual(s) who performed the analyses;

(v) the analytical techniques or methods used; and

(vi) the results of such analyses.

11. Signatory requirement

All applications, reports, or information submitted to the Administrator shall be signed and certified.

12. Reporting requirements

(a) For a new hazardous waste management facility, the permittee may not commence treatment, storage, or disposal of hazardous waste; and for a facility being modified the permittee may not treat, store, or dispose of hazardous waste in the modified portion of the facility, until:

(i) the permittee has submitted to the Administrator by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; (see Paragraph 13); or

(ii) the Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(iii) within 15 days of the date of submission of the letter in paragraph 12(a)(i) of this section, the permittee has not received notice from the Administrator of his or her intent to inspect, prior inspection is waived and the permittee may commence treatment, storage, or disposal of hazardous waste.

(b) Planned changes. The permittee shall give notice to the Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

(c) Anticipated noncompliance. The permittee shall give advance notice to the Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

(d) Transfers. This permit is not transferable to any person except after notice to the Administrator. The Administrator may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Act. In some cases, modification or revocation and reissuance is mandatory.

(e) Monitoring reports. Monitoring results shall be reported at the intervals specified elsewhere in this permit.

(f) Compliance schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

(g) Discharge reporting. The permittee shall report any noncompliance which may endanger health or the environment, including any unauthorized discharge of pollutants into the soil, sewer system, surface water, or ambient air. Any information shall be provided orally as soon as the permittee becomes aware of the circumstances by calling (609)292-5560 during business hours or (609) 292-7172 at all other times or if no contact can be made at the first number. The permittee shall report the type of substance and the amount discharged and any other information the Department may require. A written submission shall also be provided within 14 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact

dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurence of the noncompliance and an implementation schedule for undertaking the suggested measures.

(h) Other noncompliance. The permittee shall report all instances of noncompliance not reported under paragraphs (b), (e), (f), and (g) of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph 12(g) of this section.

(i) Other information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Administrator, it shall promptly submit such facts or information.

13. Referenced Engineering Plans and Reports

The construction of the facility shall be in accordance with Title 7, Chapter 26 of the New Jersey Administrative Code and the following submission:

(a) Flowen Oils Delaware Valley, Application for Solid Waste Permit: dated November 12, 1981; signed by Joseph Forte, Jr.

(b) Flowen Oils Delaware Valley, First Supplement to Application for Solid Waste Permit received March 27, 1981 signed by Joseph Forte, Jr.

(c) Engineering designs and narrative prepared and sealed by Thomas A. M. Fisher, N.J.P.E. License No. 7113; various dates.

14. Permitted Waste Types

The permittee will accept for processing only waste lubricating oils which come from equipment such as automobile crankcases, truck and bus crankcases, industrial gear boxes, oil from bearing lubrication, oil from industrial hydraulic systems and oils used in metal cutting machine shops.

15. Waste Analysis and Quality Control

(a) The facility must maintain onsite a readily accessible detailed typewritten description (i.e. laboratory analyses) of all incoming waste types including the limits or concentrations. The facility must receive prior to receipt of each waste shipment and maintain

for inspection, validation by the generator that the waste is in conformance with this detailed description. The facility is responsible for the validity of the description.

(b) Prior to commencing operation of the facility, a waste analysis plan shall be submitted to the Bureau of Hazardous Waste for approval. This plan shall include:

(i) The parameters for which each hazardous waste stream will be analyzed and the rationale for the selection of these parameters;

(ii) The test methods which will be used to test for these parameters;

(iii) The sampling method which will be used to obtain a representative sample of the waste to be analyzed;

(iv) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date; and

(v) For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply.

The plan should provide that at a minimum this analysis shall contain all the information which must be known to treat, store, or dispose of the waste.

The plan should also provide that the analysis shall be repeated as necessary to insure that it is accurate and up-to-date. At a minimum, the analysis must be repeated when the owner or operator is notified, or knows or should know, that the process or operation generating the hazardous waste has changed.

16. Sewer Monitoring

Prior to operation, the permittee shall construct a system to monitor and analyze any discharge to the sewer system. This system must be constructed and operated in accordance with a plan approved by the Bureau. take sample 1/mo by CCMUA.

17. Fire Fighting and Inspection

An adequate water supply and/or fire fighting equipment must be readily available. Fire fighting procedures must be conspicously displayed.

Fire drills are to be conducted at least twice a year. These drills are to be coordinated with the local fire fighting authority. The facility must notify the Bureau of Hazardous Waste at least forty-eight (48) hours prior to any drills.

18. Inspections and Records

(a) The permittee must perform daily a site inspection of the facility. All tanks, pipes, valves, and other structural components, etc. are to be checked for indications of structural failure, corrosion, leakage, and mechanical failure.

(b) A written daily log of conditions found and the steps taken to correct the conditions are to be kept on-site. Typewritten duplicates of these logs must be maintained on file and must be supplied to Department representatives upon request.

(c) A monthly summary of these daily inspections must be submitted to the Bureau of Hazardous Waste within seven days after the end of each month.

(d) All records prepared in accordance with this approval shall be retained for at least three (3) years.

19. Personnel

The permittee shall submit prior to commencing operation, a comprehensive list of all personnel and their particular function along with their qualifications (include experience, education, and copies of any required licenses to operate facility equipment). An up-to-date list shall be submitted on a semiannual basis.

20. Posting of Notice

The attached notice concerning civil and criminal penalties for illegal disposal of a hazardous waste must be conspicuously posted and available for all employees to read.

21. Plans on-site

One complete set of all engineering designs which have been submitted a narrative description of the operation of the facility, a facility layout drawing, this Certificate of Approved Registration and Engineering Design Approval and such other plans as may be required pursuant to this permit shall be kept on-site and shall be available for inspection by representatives of the Department.

22. Closure Plan

The permittee must submit to the Bureau of Hazardous Waste prior to commencing operations, a facility closure plan for its approval. The closure plan must include:

(a) A detailed description on how the facility will be closed;

(b) A description of possible uses for the land after closure; and

(c) The estimated time required for the completion of closure.

The closure plan to be approved by the Bureau must, at a minimum, provide for:

(a) The removal of all hazardous waste from the facility within 90 days after termination of operations.

(b) The completion of closure in one year or less from the termination of operations unless a longer period is specifically authorized by the Bureau.

(c) Proper disposal or decontamination of all equipment used either in the operation of the facility or the closure process.

(d) Such other terms, conditions, or restrictions the Bureau may require to insure that humans or animal life do not come into contact with hazardous waste or its constituents and that unauthorized discharges of pollutants onto or into the lands, water or air of this state do not occur.

23. Residue Disposal

The permittee shall, prior to commencing operation, submit to the Bureau the names and locations of the facilities intended for disposal of sludges and residues resulting from the facility's operations.

24. Drum Storage

Acceptance and/or storage of drums at this facility is not permitted without prior written authorization by the Bureau of Hazardous Waste.

25. Air Pollution Control

The facility must obtain all necessary permits and comply with all applicable Rules and Regulations of the Bureau of Air Pollution Control, Title 7, Chapter 27 of the New Jersey Administrative Code.

26. Solid and Hazardous Waste Regulations

The permittee shall comply with each of the applicable requirements specified in Title 7, Chapter 26 of the New Jersey Administrative Code, Rules of the Solid Waste Administration.

REFERENCE NO. 40

REMTECH
ENVIRONMENTAL
GROUP, INC.

January 2, 1989

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
401 East State Street
CN028
Trenton, NJ 08625-0028

Attention: Mr. Ernest J. Kuhlwein, Jr., Chief
Bureau of Hazardous Waste Engineering

Reference: Response to Notice of Deficiency dated 11/1/88
Flowen Oil Facility, Camden, NJ
EPA ID No. NJD980536577

Dear Mr. Kuhlwein:

REMTECH Environmental (N.J.) L.P. has prepared this submittal in response to the written Technical Notice of Deficiency dated November 1, 1988. REMTECH entered into an interim management agreement with the owners and operators of Flowen Oil Delaware Valley Inc. (FODV) in order to begin clean up and improvements at the facility during review of our A-901 disclosure statements.

We have endeavored to respond to your specific concerns as described in the Notice of Deficiency without drastically modifying FODV's prior submittal. As we have previously discussed, while the information submitted by FODV to NJDEP has been factual, it has not been structured into a cohesive document. Recognizing the difficulty associated with sorting through the prior submittals, we request an opportunity to consolidate, update and/or re-write where necessary, the appropriate submittals comprising FODV's current Part B application. The end result will be a comprehensive, organized document addressing all of the requirements of a Part B application.

We feel that the re-organization of FODV's Part B application would benefit all parties concerned and we are prepared to submit a completely revised application within (90) ninety days of receiving approval from your bureau. Please advise accordingly.

What follows is an itemized response to each comment received with the Notice of Deficiency. Subsequent to these responses, we have raised a few unrelated issues for your comment and direction.

1800 Carman Street
Camden, New Jersey 08105
(609) 365-5544
FAX (609) 365-0801

Response to Notice of Deficiency, dated November 1, 1988

Item 1:

This item requests; 1) an updated process flow description, 2) an updated process flow diagram and 3) a detailed list of all process equipment identifying quantity, size, capacity and material of construction.

Process Flow Description:

Attachment 1 is an updated description of the general treatment capabilities of the facility, an operational categorization of waste types received by the facility, and a description of the treatment process and equipment/processes used at the facility.

Process Flow Diagram:

Incorporated within Attachment 1, Process Flow Description, is a Process Flow Schematic (Drawing H) and seven additional drawings (Drawing A-G) describing each process system.

Equipment List:

Section 3 of Attachment 1 describes and lists each major piece of equipment complete with quantity, size, capacity and material construction.

Item 2:

This item requests the submittal of a checklist to be used during the monthly inspection of emergency equipment. Identification of minimum inventory levels of equipment and supplies is also requested.

A Monthly Inspection Record for emergency equipment has been created and is attached as Attachment 2. This document will be used as a check list and includes minimum quantities of emergency supplies and equipment. The following changes have been made to the FODV Contingency Plan:

- Add Monthly Inspection Record (Attachment 2) to Table of Contents as Appendix D.

- Replace section 1.7 Emergency Equipment, with the following:

1.7 Emergency Equipment

Management maintains the facility in compliance with the rules and regulations specified in Chapter 7:26-9-7 et. seq. With regard to preparedness and prevention, the following emergency response equipment is maintained at the facility. A monthly inspection of this equipment is carried out. A record of each inspection will be made (See Appendix D), and maintained at the facility for a minimum of (3) years.

- Replace section 1.7.3 Spill Control Equipment and 1.7.4 Personnel Protective Equipment with the following:

1.7.3 Spill Control Equipment

The following spill control equipment is available on site:

1. Empty open-head drums - Minimum of 10 drums.
2. Shovels
3. 40 Lb. bags of industrial absorbent. Minimum of 10 bags.
4. Portable 2" centrifugal pump
5. (2) - 5,000 Gallon tanker trucks.
6. 3" air operated diaphragm pump.

1.7.4 Personal Protective Equipment

The following stock of protective equipment is maintained at the facility for use by personnel during an emergency:

1. Eye Protection -

   - Neutralizing eyewash solution (2)
   - Neutralizing eyewash stations (2)

2. Gloves -

- Laboratory latex gloves (2 boxes)
- Oil resistant work gloves (12 pairs)

3. Miscellaneous -

- Acid resistant aprons (1)
- Flash light (6)

All emergency equipment is inspected on a monthly basis to insure materials are stocked and in proper working order.

Item 3:

Flowen/REMTECH has made arrangements with Clean Venture, Inc., located in Swedesboro, NJ for emergency response services. Clean Venture has extensive experience in responding to petroleum and hazardous material emergencies. A copy of an agreement between Clean Venture and Flowen/REMTECH is attached as Attachment 3.

Item 4:

This item requires the modification of Flowen's Closure Plan to include inspection and possible decontamination of the secondary containment system and process house. A revised and updated Plan and Closure Cost Estimate is attached as Attachment 4. All additions have been indicated by an asterisk (*) in the left hand margin.

Item 5:

The facility's training program has been modified to include a statement that training records on current personnel will be kept until closure of the facility and records on former employees will be kept for a minimum of three (3) years from the date the employee last worked at the facility. Page one (1) and two (2) of FODV's Training Program for Facility Personnel has been revised to include these statements and are attached as Attachment 5.

A reference to the semi-annual fire drill requirement per NJAC 7:26-9.4 (g) 8 has also been included in the revised training program.

Item 6 and 8:

Both of these items identify numerous deficiencies in FODV's Waste Analysis Plan. We have revised and attached the Waste Analysis Plan submitted on July 29. 1988 as Attachment 6. Each page that has been modified has been dated in the upper right hand corner and the specific line(s) containing the revision has a Revision notation in the left margin.

Item 7:

An explanation of the difference and significance between on-spec and off-spec used oil fuel is required under this item number. The following is an explanation. Also see revised pages 15 and 15A of the Waste Analysis Plan - Attachment #6.

Under 40 CFR Part 260 et seq, used oil (including recycled oil) burned for energy recovery is termed "used oil fuel" and is subject to regulation. This regulation controls the ultimate destination of used oil fuel according to the level of contaminants contained in the oil. These categories exist within this regulation which are defined as follows:

a) Specification Used Oil Fuel

b) Off-Specification Used Oil Fuel

c) Hazardous Waste Oil Fuel

The following table illustrates the allowable levels associated with Specification Used Oil Fuel:

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash Point	100 F minimum
Total Halogens	4000 ppm maximum*

* Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided in 40 CFR 266.40 (c). Such used oil is subject to 40 CFR Part 266 Subpart D (Hazardous Waste burned for energy recovery) unless the presumption of mixing can be successfully rebutted.

In summary therefore:

1) Used oil fuel is considered to be specification if all the contaminants or properties in the above table are met, with the exception of total halogens which must not exceed 1000 ppm, or 4000 ppm if analysis shows no mixing with hazardous waste, or rebuttable presumption is successful.

2) Used oil fuel is considered to be "off-specification" if the criteria in the above table are not met, with the same criteria for total halogens as in paragraph 1) above.

3) Used oil fuel is considered to be "hazardous" if oil is known by source or by analysis to have been mixed with hazardous waste.

   Other analytical procedures may also be required by individual clients, e.g. sulfur to meet local emission standards.

At this time we would like to raise several issues unrelated to the Notice of Deficiency response. During the past 10 weeks, REMTECH has re-evaluated several aspects of the facility's operating systems and as a result would like to propose some improvements.

Replacement of Tank #5:

We have ordered a replacement tank of the same design, specifications and from the same manufacturer to replace Tank #5 which was damaged and taken out of service several years ago. Tank #5 had originally been included in FODV's original application submittals to NJDEP. We have updated the Closure Cost Estimate to include this replacement and we believe most of the drawings on file with NJDEP still show Tank #5 as being intact and in use. What additional changes to prior submittals or new information will be necessary before we complete the installation of this tank?

Installation of New Product Tanks:

At the present time the facility has four (4) 25,000 gallon product storage tanks (P1, P2, P3 and P4). The secondary containment structure (concrete tank dike) was originally designed and constructed with significant excess capacity. We are considering the installation of two (2) additional 20,000 gallon storage tanks (P5 and P6) in this containment area. What submittals will your bureau require prior to installation?

Since the design specifications of Tanks P1 through P4 and the secondary containment system meet or exceed the requirements for waste storage tanks, we are considering the possibility of re-designating these tanks from product storage only to product and/or waste storage. What additional information would be needed by your bureau to accomplish a re-designation?

Emergency Cut-Off Valve:

As a result of discussions with the CCMUA, Flowen/REMTECH has agreed to install an emergency cut-off valve at the final point of discharge from the facility. This valve will be installed in the sampling manway located adjacent to the Laboratory building (see Attachment 7, Drawing I, Discharge Emergency Shutdown System.)

The valve will be a 10" Jamesbury Wafer Valve with an explosion proof, 110 Volt, remote motor operator. The detector will be an Oil Alarm Sentry, Model 200XP as built by Biospherics Inc. with a reporting range from 2ppm to 1000ppm petroleum hydrocarbons. The detector set-point will be 15 ppm. This setting will ensure that the Camden County MUA discharge requirements as set out in the facilitys' sewer discharge permit will not be exceeded.

We request that this installation be considered as a replacement for the proposed AFL/Clark Oil Stop Valve to be mounted in the oil interceptors as described in FODV'S Accidental Oil Discharge Prevention Plan submitted December 1, 1986.

We believe that the motor operated cut-off valve and the Oil Alarm Sentry detector is a superior method of protection. Please advise as to acceptability of this substitution. If acceptable, we will revise and submit the facility's Discharge Prevention Plan accordingly.

High/Low Level Alarms:

REMTECH has undertaken an extensive tank cleaning and tank retro-fitting project at the facility since our involvement began on October 17, 1988. This project involves; identification and removal of all existing waste inventory, cleaning and gas-freeing of each tank, and modification of each tank's support features. Some of the tank modifications planned include; high/low level alarms, double bank valves, new valves (3" full port ball valves), gauging system, raising suction line above precipitation level and installation of access ladders and walkways.

The tank retro-fitting project is proceeding on schedule, however, due to the significant amount of improvements being installed, we request an extension beyond the completion date referenced in FODV's Proposal To Install High-level Alarm and Feed Cut-off submitted to NJDEP in September/October, 1986.

We are committed to upgrading the facility and installing High/Low level alarms in all of the tanks. We will be making modifications to each of the tanks as they are cleaned and gas-freed. We anticipate that the entire tank retro-fitting project will be completed by October, 1989.

Acceptable Waste Codes:

There is an increasing tendency amongst petroleum waste generators to request shipment of petroleum waste material into our facility under 4 federal waste codes. These codes are:

K048 - Dissolved air flotation (DAF) float from the petroleum refining industry

K049 - Slop oil emulsion solids from the petroleum industry

K050 - Heat exchanger bundle cleaning sludge from the petroleum refining industry

K051 - API separator sludge from the petroleum refining industry

All of these waste are characteristically similar to the wastes typically identified by New Jersey Hazardous Waste Numbers X721 through X728. In order to accommodate these petroleum waste generators, we request the addition of these four waste codes into our draft permit as acceptable wastes.

Another re-occurring situation involves generators of a liquid petroleum hydrocarbon waste stream with a flash point less than 140 F but greater than 100 F. These generators would prefer manifesting this material to our facility under D001 code rather than an X code. We would like to pursue the "qualified" or "limited" addition of D001 as an acceptable waste stream only if the materials flash point was greater than 100 F and it was a waste stream containing petroleum hydrocarbons.

Please advise as to modifications necessary in order to add these five (5) waste codes to our permit. Should there be any questions or clarifications necessary, do not hesitate to contact either myself or Mr. Archie Ross at 609-365-5544.

Very truly yours,

Paul L. Fleischmann
Vice-President

cc: A. Ross

N.O.D Response, January 2, 1989

LIST OF ATTACHMENTS

Attachment 1: Process Flow Description

Drawings:

- A: Waste Receiving & Tank Storage System
- B: Oil/Water Separator System
- C: Ultrafiltration System
- D: Solid Bowl Centrifuge System
- E: Emulsion Breaking System
- F: Filtration and High Speed Centrifuging System
- G: Heating Loop System
- H: Process Flow Schematic

Attachment 2: Monthly Inspection Record

Attachment 3: Emergency Response Agreement

Attachment 4: Closure Plan and Closure Cost Estimate

Attachment 5: Replacement Pages for FODV's Training Program

Attachment 6: Waste Analysis Plan, Revised January 2, 1989

Attachment 7: Drawing I, Discharge Emergency Shutdown System

January 2, 1989

Attachment 1

PROCESS FLOW DESCRIPTION

Flowen/REMTECH Facility
1800 Carman Street
Camden, NJ 08105

NJD 980 536 577

January 2, 1989

PROCESS FLOW DESCRIPTION

1. General Description of Treatment Capabilities

The treatment methods utilized at the Facility employ several physical and chemical processes to separate oil containing waste streams into their component parts. These materials, primarily oil, sludge (sediment) and water are then disposed of by various appropriate approved methods to to be discussed further in this submittal.

The process used at the Facility are able to separate liquid waste streams as described by the N.J. Waste Codes X721 through X728, and federal codes K048 through K051

NJ Hazardous Waste Number	Hazardous Waste
1. X721	Waste automotive crankcase and lubricating oils from automotive service and gasoline stations, truck terminals, and garages
2. X722	Waste oil and bottom sludge generated from tank cleanouts from residential/ commercial fuel oil tanks
3. X723	Waste oil and bottom sludge generated by gasoline stations when gasoline and oil tanks are tested, cleaned or replaced
4. X724	Waste petroleum oil generated when tank trucks or other vehicles or mobile vessels are cleaned, including, but not limited to, oily ballast water from product transport units of boats, barges, ships or other vessels.
5. X725	Oil spill cleanup residue which: A. is contaminated beyond saturation; or B. the generator fails to demonstrate that the spill material was not one of the listed hazardous waste oils
6. X726	The following used and unused waste oils: metal working oils; turbine lubricating oils; diesel lubricating oils; and quenching oils
7. X727	Waste oil from the draining, cleaning or disposal of electric transformers

8. X728	Bottom sludge generated from the processing, blending, and treatment of waste oil in waste oil processing facilities
9. K048	Dissolvved air flotation (DAF) float from the petroleum refining industry
10. K049	Slop oil emulsion solids from the petroleum refining industry.
11. K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry
12. K051	API separator sludge from the petroleum refining industry

2. Operational Categorization of Waste Streams

The facility is capable of accepting and treating a wide variety of waste streams with varying concentrations of oil, sediment (sludge) and water.

In order to identify the treatment processes to which these varying wastes will be directed, they have been divided into the following categories:

A) Aqueous Wastes - Those containing less than 10% oil and less than 2% sediment.

B) High Sediment Oil Wastes - Those containing more than 3% sediment and more than 10% oil.

C) Low Sediment Oil Wastes - Those containing less than 3% sediment and more than 10% oil.

D) High Sediment Halogenated Oil Wastes - Those containing more than 4000 ppm halogens, more than 10% oil and more than 3% sediment.

E) Low Sediment Halogenated Oil Wastes - Those containing more than 4000 ppm halogens, more than 10% oil and less than 3% sediment.

The following chart summarizes the various operational categories assigned to incoming waste streams:

Operational Category	Oil Content	Water Content	Sediment Content	Halogen Content
A) Aqueous Waste	<10%	87-99%	<3%	N/A
B) High Sediment Oil Wastes	>10%	0-87%	>3%	<4000 ppm
C) Low Sediment Oil Wastes	>10%	0-90%	<3%	<4000 ppm
D) High Sediment Halogenated Oil Wastes	>10%	0-87%	>3%	>4000 ppm
E) Low Sediment Halogenated Oil Wastes	>10%	0-90%	<3%	>4000 ppm

An operational category and a corresponding treatment method is determined for each waste stream during the waste acceptance procedure prior to the material actually arriving at the facility. Upon arrival at the facility the waste material's characteristics are checked and the operational category/treatment method is confirmed.

Subsequent to confirming the proper treatment for each incoming waste stream, the material is off loaded through a receiving tank and is transferred into one of the the seventeen (17) 15,000 gallon waste storage tanks (Drawing A).

3. Description of Treatment and Processes Equipment

The Flowen/REMTECH facility utilizes the following equipment to transfer, treat and/or store oil contaminated waste streams:

- Waste Receiving & Tank Storage System (Drawing A)
- Oil/Water Separator System (Drawing B)
- Ultrafiltration System (Drawing C)
- Solid Bowl Centrifuge System (Drawing D)
- Emulsion Breaking System (Drawing E)
- Filtration and High Speed Centrifuging System (Drawing F)
- Heating Loop System (Drawing G)

The specific flow of waste material through the facility and the sequence of treatment processes to be employed will be dependent on the waste materials physical characteristics and/for contaminants. A Process Flow Schematic is attached as Drawing H.

Listed below is a description of each major piece of equipment grouped under the process system which it functions.

A. WASTE RECEIVING AND TANK STORAGE SYSTEM

- Refer to Attached Drawing A

Equipment List, A

- **Name:** Receiving Tank

Description: Carbon Steel Open Top Tank, 5'6" x 4'W x 4'High with 3/8" bar filter screen to remove larger debris. Trucks unload by gravity into these tanks.

Quantity: 2

Size: 600 Gallons

Material of Construction: Carbon Steel

Capacity: N/A

- **Name:** Yard Pumps

Description: Mono MD80 P.D. pumps which can move waste material from:

a) Receiving tank to tanks A,B. 1-12
b) From any tanks listed above to any tanks listed above.
c) From any tank listed above to receiving tank at oil/water separator.
d) From any tank listed above to load tank trucks.

Quantity: 2

Size: 80mm (4 inch)

Material of Construction: Cast Iron/Stainless Steel

Capacity: 84 gpm

- **Name:** Storage Tanks

Description: Above-ground verticle storage tanks with (1) manway on top and one 4-ft. from bottom. Each manway is 18" in diameter. These tanks are used for receipt of incoming wastes and/or storage of intermediate process materials.

Quantity: 17

Size: 10' diameter x 25'6" high

Material of Construction: Carbon Steel

Capacity: 15,000 Gallons (nominal)

B. OIL/WATER SEPARATOR SYSTEM

- Refer to Attached Drawing B

This system is used to separate free oil (i.e. oil not in emulsion) and sediment from aqueous wastes.

Incoming aqueous wastes are passed through this system at a rate of up to 500 gallons per minute (gpm). The outgoing aqueous phase is then pumped to storage in one or more of tanks C2, C3, 7 or 9 for future treatment in the Ultrafiltration process.

The outgoing oil phase is pumped to storage in tanks 4 or 6 for further treatment in either the Emulsion Breaking System and/or Filtration and High-speed Centrifuging System.

The outgoing sediment phase is pumped to storage in tank 2 for further treatment in the Solid Bowl Centrifuge.

Equipment List, B:

- **Name:** Separator Feed Pumps

Description: Pumps which pump material from aqueous receiving tank to oil/water separator.

Quantity: 2

Size: 6'

Material of Construction: Carbon Steel/Stainless Steel

Capacity: 100 gpm

- **Name:** Oil/Water Separator

Description: A coalescer separator to remove free oil and sediment from oil contaminated water. The separator employs steam heated coils to prevent freezing.

Quantity: 1

Size: 10' wide x 9'long x 8' high

Material of Construction: Carbon Steel with Coal Tar Epoxy Coating

Capacity: 500 gpm

- **Name:** Separator Delivery Pumps

Description: Pumps which deliver pre-treated aqueous streams to tanks 7,9, C1, C2 or C3.

Quantity: 2

Size: 6"

Material of Construction: Carbon Steel/Stainless Steel

Capacity: 100 gpm

- **Name:** Oil Pump

Description: A pump which removes the oil phase from the oil/water separator and delivers it to tanks 4 and 6 for further processing.

Quantity: 1

Size: 6"

Material of Construction: Carbon Steel/Stainless Steel

Capacity: 100 gpm

- **Name:** Sludge Pump

Description: A Moyno P.D. pump which removes the sediment from the oil/water separator and delivers it to tank 2 for further processing.

Quantity: 1

Size: 2"

Material of Construction: Carbon Steel

Capacity: 30 gpm

C. ULTRA - FILTRATION SYSTEM

- Refer to Drawing C

This equipment is used for final treatment of water prior to sewer discharge. All process water and wash water from the process building passes through this equipment prior to discharge to the City of Camden Sewer System, and thence, to the Camden County Municipal Utilities Authority Treatment Plant in the City of Camden.

Pre-treated water wastes are pumped from Tanks 7, 9 C2 or C3 into tank C1, from which the material is pumped to the Ultra-Filtration Unit under pressure. Water passes through the membranes of the unit into a 1000 gallon storage tank at up to 30 gpm, and thence to the plant sewer system. The balance of the material passes back to tank C1. Tank C1 is periodically replenished with waste water pumped from tanks 7,9, C2 or C3, until the oil content in tank C1 reaches 25-40%. At this time, the concentrated material is pumped to another storage tank for future treatment in the Emulsion Breaking System.

Equipment List C:

- **Name:** U.F. Feed Pump

Description: A centrifugal pump which pumps pre-treated aqueous material from tank #11 to the Ultra-Filtration system. The balance of material flows back to tank #11.

Quantity: 1

Size: 3" x 2"

Material of Construction: Cast Steel

Capacity: 50 gpm

- **Name:** Line Heater

Description: A 40 sq. ft. spiral tube and shell heat exchanger which heats product from tank 11 prior to ultra-filtration.

Quantity: 1

Size: 2'6" diam. x 1'3" high (40 sq. ft. of heating area).

Material of Construction: Shell - Stainless Steel
Tubes - Cupro-nickel

Capacity: 50 gpm

- **Name:** Duplex Strainer

Description: Steamer with 1/32" mesh screens to prevent solids from entering U.F. module.

Quantity: 1

Size: 2"

Material of Construction: Carbon Steel

Capacity: N/A

- **Name:** Circulating Pump

Description: A centrifugal pump circulating process liquid through the U.F. module.

Quantity: 1

Size: 6" x 4"

Material of Construction: Carbon Steel

Capacity: 600 gpm

- **Name:** Ultra-Filter Module

Description: A series of 168, 1" x 10' membrane tubes for removal of oil from waste water. The process liquid is continuously pumped through the tubes, where waste water passes through the membrane, and thence to sewer discharge. Oil is thus prevented from being discharged to sewer.

Quantity: 1

Size: 388 Sq. Ft.

Material of Construction: Koch Membrane Filter Systems
HDPE Pipe - Membrane material Proprietary

Capacity: 30 gpm

- **Name:** Water Storage Tank

Description: A 1000 Gallon storage tank for receipt of treated waste water prior to sewer discharge.

Quantity: 1

Size: 6' diam. x 7' high

Material of Construction: High density polyethylene

Capacity: 1000 gallons (nominal)

D. SOLID BOWL CENTRIFUGE SYSTEM

- Refer to Drawing D and Drawing H - Process Flow Schematic

This equipment is used to separate liquid and solid phases of wastes. High sediment wastes or sludges previously stored in tank #2 are treated to reduce viscosity and then passed to the solid-bowl centrifuge for separation of the oil/water sediment phases.

The equipment relies on centrifugal force to separate by gravity the dense (sediment) phase from the light (oil and/or water) phase. Each centrifuge has a capacity of up to 35 gpm.

The sediment phase is collected in drums for disposal, or is placed in a bulk container for disposal or further off-site treatment prior to disposal.

The liquid phase, depending upon the nature and content of the material will be passed to another treatment process, or to final storage prior to disposal according to the following parameters:

i) Material containing less than 2% BS&W (bottom sediment and water) will be pumped to final storage for disposal.

ii) Material containing less than 15% BS&W in free emulsion (i.e. separable by gravity) will be pumped to vibrating filters to remove solids greater than 86 microns in size and thence to high-speed centrifuges where water and sediment will be removed to a maximum of 2% BS&W.

iii) Material containing more than 15% BS&W, or oil and water in a chemical emulsion will be pumped to the Emulsion Breaking System where:

a) Oil and water will separate down to a maximum of 15% BS&W in the oil phase, or,

b) pH adjustment together with chemical demulsifiers will be used to separate the oil and water down to as maximum of 15% water in the oil phase prior to further treatment.

If plant conditions dictate, the liquid phase from the solid bowl centrifuge may be pumped to storage tanks 4 or 6 for future treatment. Chemical flocculants and/or coagulants may be injected directly into the feed to the solid bowl centrifuges as an aid to improving either the conditions of the sediment leaving the equipment and/or assisting the removal of sediment from the liquid phase.

Equipment List, D:

- **Name:** Flocculent/Coagulant Injection Pump

Description: A P.D. pump capable of delivering up to 0.5% of flow capacity from a drum into the process line prior to the solid bowl centrifuge.

Quantity: 1

Size: 1/2"

Material of Construction: Stainless Steel

Capacity: 0.35 gpm

- **Name:** Solid-Bowl Centrifuge

Description: A liquid/solid centrifugal separator operated on a continuous basis to remove sediment from oil/water mixtures.

Quantity: 2

Size: 4' long x 2.5' wide x 3' high

Material of Construction: Stainless Steel

Capacity: 35 gpm

- **Name:** Delivery Pump

Description: A Moyno P.D. Pump controlled by a varying column pressure capable of delivering a continuous flow of liquid to:

a) Storage tanks 4 and 6
b) Emulsion breaking system
c) Filtration/high speed centrifuge system
d) Product storage tanks

Quantity: 1

Size: 4"

Material of Construction: Carbon Steel/Stainless Steel

Capacity: 68 gpm

E. EMULSION BREAKING SYSTEM

- Refer to Drawing E

This equipment is used for two purposes:

a) To allow separation of oil and water in free emulsion, using heat to reduce viscosity.

b) To chemically separate oil and water in chemical emulsion using pH adjustment and demulsifiers.

The material separated in this equipment will be processed at up to 100 gpm. Material will be pumped from the heating loop or the solid-bowl centrifuge to this system.

The oil phase upon leaving the system will be pumped to either the filtration/high speed centrifuging system for further treatment, or be returned to tank 4 or 6 for future treatment. If the BS&W of the oil phase is less than 2%, this material will be pumped to final storage for disposal. The aqueous phase will be pumped to tanks 7,9, C2 or C3 for future treatment through the Ultra-Filtration Unit, after pH adjustment (if necessary) to the range of 6-9. This is necessary in order to comply with sewer discharge requirements. The sediment (sludge) phase will be drummed and pumped to tank #2 or pumped directly to tank #2 for future treatment in the solid-bowl centrifuge.

Equipment List, E:

- **Name:** Emulsion Breaking System

Description: A package unit (Great Lakes 100 EBS) for separating chemically emulsified oil/water mixtures into their component parts through chemical and physical means. The unit consists of:

a) A mixing tank for pH reduction to as low as 2 through the addition of sulfuric acid.
b) A mixing tank for the mixing of demulsifier.
c) A separation section including a slant rib coalescer, and steam coils for freeze prevention.
d) a mixing tank to increase pH to the range 6-9 using sodium hydroxide, in order to meet sewer discharge requirements.

Size: 3.5' wide x 10' long x 7.5' high

Material of Construction: Carbon Steel/Coal tar epoxy coating.

Capacity: 100 gpm

- **Name:** Aqueous Phase Pump

Description: A Moyno P.D. pump for removal of the aqueous phase, and delivery to tanks 7,9, C1, C2 or C3 for further treatment.

Quantity: 1

Size: 6"

Material of Construction: Carbon Steel/Stainless Steel

Capacity: 90 gpm

- **Name:** Oil Phase Pump

Description: A Moyno P.D. pump for removal of the oil phase from the emulsion-breaking system and delivery to the following:

a) Tanks 4 or 6 for further processing, or
b) To product storage, or
c) To filtration, high speed centrifuging system.

Quantity: 1

Size: 6"

Material of Construction: Carbon Steel/Stainless Steel

Capacity: 85 gpm

- **Name:** Sludge Pump

Description: A Moyno P.D. pump for removal of the sludge phase from the emulsion breaking system and delivery to tank 2 for further processing.

Quantity: 1

Size: 2"

Material of Construction: Carbon Steel/Stainless Steel

Capacity: 3 gpm

F. FILTRATION AND HIGH SPEED CENTRIFUGING SYSTEM

- Refer to Drawing F

This treatment system is used for the final polishing of oil containing less than 3% sediment (sludge) and less than 15% water in free emulsion.

The material is passed over vibrating screws to remove solids greater than 83 microns in size, and then heated in line heaters prior to being pumped to high speed centrifuges. Here, water is also pumped into the centrifuges. Free water contained in the oil together with sediment leaves the centrifuge with the water phase, and is passed to a settlement tank where the excess water is drained off and pumped to tank #11 for further treatment. The clarified oil phase is then pumped to final storage prior to disposal.

The settled sludge in the settlement tank is periodically pumped off and to storage in tank #2 for processing through the solid bowl centrifuge.

Equipment List, F:

- **Name:** Vibrating Screens

Description: Kason 48' vibrating screens with 200 mesh (83 microns) stainless steel mesh to prevent solids larger than that specified from reaching the high speed centrifuge.

Quantity: 2

Size: 48"

Materials of Construction: Carbon Steel/Stainless Steel

Capacity: 50 gpm

- **Name:** Demulsifier Injection System

Description: An injection pump capable of delivering up to 0.5% of flow rate to the line prior to the vibrating screens to allow better separation of oil and water to occur at the high speed centrifuge.

Quantity: 1

Size: 0.5"

Materials of Construction: Stainless Steel

Capacity: 0.5 gpm

- **Name:** Intermediate Pumps

Description: Mono M.D. 70 P.D. pumps to remove process liquid from the vibrating screens to in-line heaters, and thence to the high speed centrifuge.

Quantity: 2

Size: 70MM (3")

Materials of Construction: Cast Iron/Stainless Steel

Capacity: 50 gpm

- **Name:** Line Heaters

Description: Haripin tube and shell heat exchangers which are used to heat process liquid to as high as 200 F before introduction to the high speed centrifuges. High pressure steam (up to 100 psig) is used as the heating medium and condensate is returned for reuse.

Quantity: 4

Size: 15 sq. ft.

Materials of Construction: Carbon Steel

Capacity: 25 gpm

- **Name:** High Speed Centrifuges

Description: Sharples D1500 high-speed nozzle bowl-type centrifuges to remove sediment up to 3% and water up to 15% from the process fluid. Water is added at up to 14 gpm, and the sediment and water from the process liquid leaves the centrifuge with the water phase. The clarified oil phase leaves the centrifuge separately for removal to storage.

Quantity: 4

Size: 3' long x 3' wide x 4' high

Materials of Construction: Cast Steel, Cast Aluminum, Stainless Steel

Capacity: 25 gpm

- **Name:** Flowen Pumps

Description: Mono MD 70 P.D. pumps which remove clarified oil from the high speed centrifuges and deliver it to:

a) Product tanks P1 - P4, or
b) Tanks 4 or 6 for further processing

Quantity: 2

Size: 70mm (3")

Materials of Construction: Cast Iron/Stainless Steel

Capacity: 50 gpm

- **Name:** Settlement Tank

Description: A V-bottom sectional tank where water from the high-speed centrifuges is recycled for further use. The sediment settles to the bottom of the tank, and any free oil plus water winds from the top for further treatment prior to disposal. The sediment (sludge) is pumped to tank #2 for further processing.

Quantity: 1

Size: 20' long x 8' wide x 8' high

Materials of Construction: Carbon Steel

Capacity: 1700 gallons

- **Name:** Recirculation Pumps

Description: Centrifugal pumps which deliver clarified water from the settlement tank to the water calorifiers and thence to the high speed centrifuges.

Quantity: 2

Size: 3" x 2"

Materials of Construction: Carbon Steel

Capacity: 54 gpm

- **Name:** Water Calorifiers

Description: Haripin tube and shell heat exchangers which are use to raise the temperatures of recycle water to from the settlement tank to 150 F prior to delivery to the high speed centrifuges.

Quantity: 2

Size: 20 sq. ft.

Materials of Construction: Carbon Steel

Capacity: 27 gpm

- **Name:** Intermediate Water Pumps

Description: Centrifugal sump pumps which remove water from the collection tank, after discharge from the high-speed separators, and return it to the settlement tank for recycling.

Quantity: 2

Size: 3 x 2"

Materials of Construction: Carbon Steel

Capacity: 54 gpm

- Name: Sludge Pump

Description: A Moyno P.D. pump which periodically removes accumulated sludge from the settlement tank and delivers it to tank P2 for further processing.

Quantity: 1

Size: 6"

Materials of Construction: Cast Steel/Stainless Steel

Capacity: 50 gpm

G. HEATING LOOP SYSTEM

- Refer to Drawing G

For purposes of lowering viscosity to enable separation to occur more easily, extensive use of heat is used in many of the treatment processes. Heat is also provided in storage tanks to enable high viscosity materials to remain pumpable.

This heat is provided by steam from an on-site 150 H.P. steam raising boiler, fired by natural gas or heavy oil. All condensate is recovered and reused.

a) A heating loop (Drawing G), which permits heating of process material up to 200 F is provided to heat material prior to treatment in the following systems:

   i) The solid-bowl centrifuge
   ii) The emulsion-breaking system
   iii) The filtration/high speed centrifuge system.

b) The Ultra Filtration System (Drawing C) feed is heated to as high as 140 F to enable higher rates of throughput to be achieved, and to maintain system cleanliness.

c) The Filtration/High Speed Centrifuge System (Drawing F) has line heaters installed which allow heating to 200 F prior to high-speed centrifuging.

d) The Oil/Water Separator System (Drawing B) has heaters installed to prevent freezing in cold conditions.

e) The Emulsion Breaking System (Drawing E) has heaters installed to prevent freezing in cold conditions.

f) Tanks 8 and 12 have plate heaters installed which allow highly viscous materials to be stored, and remain pumpable. These tanks can be heated up to 150 F.

Equipment List, G:

- **Name:** Spiral Heat Exchangers

Description: These are used to pre-heat process liquid to as much as 200 F prior to treatment in:

a) The solid bowl centrifuge system.
b) The emulsion-breaking system.
c) The filtration and high speed centrifuge system

The heat exchangers are of spiral plate internal construction, heated by H.P. steam (up to 100 psig). The condensate is returned for reuse.

Quantity: 2

Size: 40 sq. ft.

Materials of Construction: Carbon Steel Shell/Stainless Steel Internals

Capacity: 100 gpm

- **Name:** Flow Central Valve/Back Pressure Valve

Description: This pair of control valves are of the pinch-valve type. As the operator opens the flow control valve, the back pressure valve closes, forcing process liquid to the required production system. The valves are infinitely variable from 0% - 100% open.

Quantity: 1 Pair

Size: 3"

Material of Construction: Cast Iron

Capacity: 100 gpm

- Name: Process Pumps

Description: Mono MD70 pumps receiving process liquid from:

a) Tanks A&B, 1-2 or
b) Directly from an off-loading truck and delivering it to heat exchangers for pre-heating prior to treatment. Liquid is drawn off at a flow control valve after the heat exchangers, and the balance is recirculated to the process pumps.

Quantity: 2

Size: 70mm (3")

Material of Construction: Cast Iron/Stainless Steel

Capacity: 50 gpm

Name: Demulsifier Injection Pump

Description: A P.D. pump capable of delivering up to 0.5% of the process flow from a drum into the process liquid to enable oil/water emulsion to be separable under physical separation methods.

Quantity: 1

Size: 0.5"

Material of Construction: Stainless Steel

Capacity: 0.5 gpm

REFERENCE NO. 41

Terry/Jack

Let's protect our earth

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
Deputy Director
Hazardous Waste Operations

John J. Trela, Ph.D., Director
401 East State St.
CN 028
Trenton, N.J. 08625-0028
(609)633-1408

Lance R. Miller
Deputy Director
Responsible Party Remedial Action

MEMORANDUM

TO: John Renella, Assistant Director
Division of Regulatory Affairs

FROM: Karl Delaney, Assistant Director
Division of Hazardous Waste Management

SUBJECT: Flowen Oil Delaware Valley, Inc.,
AO/NOCAPA dated November 30, 1988

DATE: January 31, 1989

Please find attached an administrative hearing request received from Flowen Oil Delaware Valley, Inc. on December 29, 1988 regarding then above referenced AO/NOCAPA dated November 30, 1988. Enclosed for your review is a copy of the document and the certified mail return receipt card.

Flowen's legal representatives state in their request that Flowen disputes the findings and denies any violations. They request that this matter be referred to OAL immediately. Therefore, the request is being sent to DRA for processing.

If you have questions or need any additional information, please contact Carolyn Grasso of my staff.

RECEIVED

FEB 7 1989

Division of Waste Mgt.

KJD/clg

ENCLOSURES
cc: John Barry
Wayne Howitz
SFO regional file
case file

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TELECOPIER: (609) 627-4370

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(609) 924-6336

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BARBARA A. PARKER
PAUL McDONALD
GLENN A. HARRIS

December 23, 1988

New Jersey Department of
Environmental Protection
Division of Hazardous Waste Management
CN028
Trenton, NJ 08625

CERTIFIED MAIL
RETURN RECEIPT

Attention: Assistant Director for Enforcement

Re: Flowen Oil Delaware Valley, Inc.
Administrative Order and Notice of Civil
Administrative Penalty Assessment,
dated November 30, 1988

Dear Sir or Madam:

This firm is counsel to Flowen Oil Delaware Valley, Inc. On behalf of our client, we are hereby requesting an administrative hearing to contest the above-captioned Administrative Order and Notice of Civil Administrative Penalty Assessment. The legal authority and jurisdiction under which such a hearing is requested is N.J.S.A. 52:14B-1 et. seq. and N.J.S.A. 13:1E-9. The specific statutes and regulations involved in this matter include, but are not limited to, the following: N.J.A.C. 7:26-9.2(c)(1); N.J.A.C. 7:26-12.3(e)(2); and N.J.A.C. 7:26-7.6(a)(2). Flowen Oil Delaware Valley, Inc. denies all of the statements of fact and conclusions of law set forth in the Administrative Order. Specifically, Flowen Oil Delaware Valley, Inc., disputes the statements contained in Findings of Fact Nos. 3-8 inclusive, and denies that such facts constitute any violations of law.

Kindly refer this matter to the Office of Administrative Law immediately. Thank you for your cooperation.

Very truly yours,

Richard M. Hluchan

RECEIVED

RMH:jbh

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

HS 01339

Michele M. Putnam
Deputy Director
Hazardous Waste Operations

John J. Trela, Ph.D., Director
401 East State St.
CN 028
Trenton, N.J. 08625
(609)633-1408

Lance R. Miller
Deputy Director
Responsible Party Remedial Action

30 NOV 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Flowen Oil Delaware Valley, Inc.
1800 Carmen Street
Camden, NJ 08105

Attention: Archie Ross, Facility Manager

Dear Mr. Ross:

There is enclosed for service upon you an Administrative Order and Notice of Civil Administrative Penalty Assessment issued by the New Jersey Department of Environmental Protection pursuant to the provisions of the Solid Waste Management Act.

The Department is available to meet with the principals of the case to discuss the enclosed enforcement document. Should you desire such a meeting, please contact Carolyn Grasso with twenty (20) calendar days of receipt of this letter. This does not affect the time frame within which you may request an administrative hearing, under the Notice of Right to Hearing provisions of the enclosed document.

Should you have any questions concerning this matter, please contact Carolyn Grasso at 609-346-8000.

Sincerely,

Karl J. Delaney, Assistant Director
Enforcement Element

KJD:krb
cc: Health Department
Mayor's Office
Bureau of Compliance and Technical Services
Regional Field Office
Division of Criminal Justice
enclosure(s)

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State of New Jersey
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Michele M. Putnam
Deputy Director
Hazardous Waste Operations

Lance R. Miller
Deputy Director
Responsible Party Remedial Action

30 NOV 1988

IN THE MATTER OF FLOWEN OIL DELAWARE VALLEY, INC. 1800 CARMEN STREET CAMDEN, NJ	: : :	ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

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 the "Department") by N.J.S.A. 13:1D-1 et seq. and the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq., and duly delegated to the Assistant Director for Enforcement of the Division of Hazardous Waste Management pursuant to N.J.S.A. 13:1B-4.

FINDINGS

1) Flowen Oil Delaware Valley, Inc. (hereinafter "Flowen Oil") is a generator and transporter of hazardous waste and operates a hazardous waste facility (EPA ID #NJD980536577) as defined by N.J.A.C. 7:26-1.4 and is located at 1800 Carmen Street, Block 1431, Lot 1, Camden City, Camden County, New Jersey.

2) Flowen Oil operates its facility pursuant to a Certificate of Approved Registration and Engineering Design Approval (C.A.R./E.D.A.) issued by the Department on June 10, 1981, under Facility Registration No. 6408A, later amended to No. 0408B, and an Administrative Consent Order (A.C.O.) entered into on November 18, 1986. These authorizations are equivalent to a "license" as that term is defined by N.J.S.A. 13:1E-12.7(g). Flowen Oil also holds a hazardous waste transporter license, No. S-8156, issued by NJDEP.

3) During a regular facility inspection conducted by a Departmental representative on September 14, 1987, it was observed

that Flowen Oil accepted 6,500 gallons of liquid hazardous waste (X728) from Lionetti Oil Recovery, Inc. (hereinafter "Lionetti") and discharged the hazardous waste directly from the Lionetti tank trailer into the facility's drain system which feeds through an interceptor directly to the Camden City municipal sewer system, in violation of N.J.A.C. 7:26-9.2(c)1.

4) By employing this process, Flowen Oil failed to comply with condition 13 of the C.A.R./E.D.A and condition 13 of the A.C.O., in violation of N.J.A.C. 12.3(e)2.

5) During a regular facility inspection conducted by a Departmental representative on September 29, 1987, it was observed that Flowen Oil was storing containerized waste in excess of ninety (90) days, in violation of condition 13 of the C.A.R./E.D.A. and condition 13 of the A.C.O. By failure to meet the conditions of the C.A.R./E.D.A. Flowen Oil is in violation of N.J.A.C. 7:26-12.3(e)2.

6) During a regular facility inspection conducted by a Departmental representative on April 15, 1988, it was observed that Flowen Oil was again storing containerized waste in excess of ninety (90) days, in violation of condition 13 of the C.A.R./E.D.A. and condition 13 of the A.C.O. By failure to meet the conditions of the C.A.R./E.D.A. Flowen Oil is in violation of N.J.A.C. 7:26-12.3(e)2.

7) During a regular facility inspection conducted by a Departmental representative on April 29, 1988, it was observed that Flowen Oil accepted a shipment of hazardous waste accompanied by an improperly completed manifest (Manifest number NJA0372939), in violation of N.J.A.C. 7:26-7.6(a)2.

8) Based on the facts set forth in these FINDINGS, the Department has determined that Flowen Oil has violated the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and the regulations promulgated pursuant thereto, N.J.A.C. 7:26-1 et seq., specifically N.J.A.C. 7:26-9.2(c)1, 12.3(e)2 and 7.6(a)2.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT FLOWEN OIL SHALL:

9) Immediately upon receipt of this Order, comply with N.J.A.C. 7:26-9.2(c)1 by ceasing the discharge of hazardous waste directly into the Camden City municipal sewer system.

10) Immediately upon receipt of this Order, meet all requirements of the C.A.R./E.D.A. issued by the Department on June 10, 1981 and the A.C.O. entered into on November 18, 1986.

11) Not allow hazardous waste to accumulate in containers on site in excess of ninety (90) days without prior submittal of all necessary permit applications.

12) Not accept any hazardous waste accompaned by manifests which do not comply with N.J.A.C. 7:26-7.4(a)4.

13) Within twenty (20) calendar days upon receipt of this Order submit the enclosed VERIFICATION OF COMPLIANCE by certified mail, return receipt requested or by hand delivery to:

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Southern Bureau of Field Operations
20 East Clementon Road
Gibbsboro, NJ 08026
Attention: Carolyn Grasso

14) This Order shall be effective upon receipt.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

15) Pursuant to N.J.S.A. 13:1E-9e and based upon the above FINDINGS, the Department has determined that a civil administrative penalty should be assessed against Flowen Oil in the amount of $48,000.

16) 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 check payable to "Treasurer, State of New Jersey" and shall be submitted to:

New Jersey Department of Environmental Protection
Division of Financial Management Planning and General Services
Bureau of Revenue
CN 402
Trenton, NJ 08625

17) 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 and the penalty shall be due and payable.

NOTICE OF RIGHT TO A HEARING

18) Pursuant to N.J.S.A. 52:14B-1 et seq. and N.J.S.A. 13:1E-9, Flowen Oil is entitled to an administrative hearing. Any hearing request shall be delivered to the address below within twenty (20) calendar days from receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment.

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
CN 028
Trenton, NJ 08625
Attention: Assistant Director for Enforcement

19) Flowen Oil shall, in its request for a hearing, furnish the NJDEP with the following:

a. A statement of the legal authority and jurisdiction under which the hearing or action to be taken is to be held;

b. A reference to the particular sections of the statutes and rules involved;

c. A short and plain statement of the matters of fact and law asserted; and

d. The provisions of this Administrative Order and Notice of Civil Administrative Penalty Assessment to which Flowen Oil objects, the reasons for such objections, and any alternative provisions proposed.

GENERAL PROVISIONS

20) This Administrative Order and Notice of Civil Administrative Penalty Assessment is binding on Flowen Oil, 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.

21) Notice is given that violations of any statutes, rules or permits other than those herein cited may be cause for additional enforcement actions, either administrative or

judicial. 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) No obligations imposed by this Administrative Order and Notice of Civil Administrative Penalty Assessment (with the exception of paragraph 15, above) are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations are imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety, welfare and environment.

23) Notice is given that pursuant to N.J.S.A. 13:1E-9e, the Department is authorized to assess a civil administrative penalty of not more than $25,000 for each violation and additional penalties of not more than $2,500 for each day during which the violation continues after receipt of an administrative order from the Department.

24) Notice is further given that pursuant to N.J.S.A. 13:1E-9f, any person who violates N.J.S.A. 13:1E-1 et seq. or any code, rule or regulation promulgated thereunder shall be liable to a penalty of not more than $50,000 per day of such violation, and each day's continuance of the violation shall constitute a separate violation.

25) Notice is further given that pursuant to N.J.S.A. 13:1E-9f, any person who violates an administrative order issued pursuant to N.J.S.A. 13:1E-9c, or a court order issued pursuant to N.J.S.A. 13:1E-9d, or who fails to pay a civil administrative penalty in full after it is due shall be subject upon order of a court to a civil penalty not to exceed $100,000 per day of such violation and each day's continuance of the violation shall constitute a separate violation.

Karl J. Delaney
Assistant Director
Hazardous Waste Enforcement

KJD:krb

REFERENCE NO. 42

State of New Jersey
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
RICHARD J. HUGHES JUSTICE COMPLEX
CN 112
TRENTON 08625

ROBERT J. DEL TUFO
ATTORNEY GENERAL

KENNETH S. LEVY
ASSISTANT ATTORNEY GENERAL
DIRECTOR

(609) 292-1509

March 16, 1990

DIV. R... SERVICES
OFF... DIRECTOR
MAR 19 2 54 PM '90

Honorable Steven C. Reback, ALJ
Office of Administrative Law
9 Quakerbridge Plaza
CN 049
Trenton, New Jersey 08625

Re: I/M/O Flowen Oil Delaware Valley, Inc.
Docket No. EHW-8184-87
Agency Ref. No. 87-284

Dear Judge Reback:

Pursuant to the last conference call among the parties in this matter on January 31, 1990, and Your Honor's order of February 9, 1990, the Department of Environmental Protection submits the following by way of amendment to the Administrative Order/Notice of Civil Administrative Penalty Assessment, etc., ("Administrative Order") in this matter. The following paragraphs should be considered a part of the Administrative Order for all purposes:

62(A) On September 10, 1987, the State Grand Jury handed up a 26-count indictment in State v. Daniel Tarrats (a/k/a Michael Danna, a/k/a Michael D'Anna, a/k/a Kevin Flynn) and National Cor-

porate Disposal Inc., No. SGJ-190-87-1. A copy of the indictment is attached to this Order and made a part hereof as Attachment A.

62(B) The indictment alleged, inter alia, that Daniel Tarrats and National Corporate Disposal committed the crimes of making false statements on manifests, in violation of N.J.S.A. 13:1E-9g(5); making false statements to persons who prepared manifests, in violation of N.J.S.A. 13:1E-9g(4); theft by deception, in violation of N.J.S.A. 2C:20-4; tampering with public records or information, in violation of N.J.S.A. 2C:28-7a(1) and (2); falsifying or tampering with records, in violation of N.J.S.A. 2C:21-4; forgery, in violation of N.J.S.A. 2C:21-1a; misconduct by a corporate official, in violation of N.J.S.A. 2C:21-9c; and conspiracy to commit those crimes, in violation of N.J.S.A. 2C:5-2.

62(C) All of the crimes alleged in the indictment, except Count 26, arose out of the same subject matter and conduct alleged in Paragraphs 43 through 62, inclusive, of this Order, i.e., the section of the Order entitled "The Kentile Floors Cleanup Job."

62(D) On September 18, 1987, both defendants entered pleas of not guilty to all charges of the indictment.

62(E) On June 15, 1989, Daniel Tarrats appeared before the Honorable James F. Madden, Superior Court of New Jersey, Law Division, Bergen County, and changed his plea on Counts 21 and 26 from not guilty to guilty. The guilty pleas were accepted by Judge Madden on that date.

62(F) The counts to which Daniel Tarrats pled guilty read respectively as follows:

COUNT TWENTY-ONE

(Forgery - Fourth Degree)

DANIEL TARRATS
also known as
MICHAEL DANNA
also known as
MICHAEL D'ANNA
also known as
KEVIN FLYNN

and

NATIONAL CORPORATE DISPOSAL, INC.

on or about October 17, 1986, in the Borough of Bogota, County of Bergen, at the Borough of South Plainfield, in the County of Middlesex, elsewhere and within the jurisdiction of this Court, with the purpose to defraud the State of New Jersey, S&D Engineering, Inc., and Kentile Floors, did execute writings, namely New Jersey Uniform Hazardous Waste Manifests bearing document identification numbers NJA0213511, 0213512, 0213513, 0213514 and 0213515, so that line 20 of the said manifests purported to be the signature of Linda Lambert, who did not authorize said signature; contrary to N.J.S.A. 2C:21-1(a)(2), N.J.S.A. 2C:2-6, N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Forgery - Fourth Degree)

DANIEL TARRATS
also known as
MICHAEL DANNA
also known as
MICHAEL D'ANNA
also known as
KEVIN FLYNN

and

NATIONAL CORPORATE DISPOSAL, INC.

on or about March 23, 1987, at the City of Hackensack, in the County of Bergen, elsewhere and within the jurisdiction of this Court, with the purpose to defraud, did utter as true to Bergen County Investigator John F. Poliey a New Jersey State Driver's License Number F5688-43374-05555, bearing thereon the signature of KEVIN FLYNN, and bearing the photograph of DANIEL TARRATS, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1(a)(3), and against the peace of this State, the government and dignity of the same.

62(G) The guilty pleas were entered by Daniel Tarrats to Counts 21 and 26 of the indictment pursuant to a plea agreement with the Division of Criminal Justice (the prosecuting agency) by which that Division would move, at Tarrats' sentencing, for dismissal of all remaining counts against Daniel Tarrats and all counts against National Corporate Disposal, Inc.

62(H) On August 4, 1989, Daniel Tarrats was sentenced on Count 21 to two years' probation and a fine of $2,000. An identi-

cal sentence (and fine) was imposed on Count 26 with the terms of probation to run concurrently. The $4,000 fine is to be paid in installments of $200 per month beginning September 1, 1989. The remaining counts were dismissed pursuant to the plea agreement on that date. The Judgment of Conviction is attached to this Order and made a part hereof as Attachment B.

62(I) Under the waste industry licensing law widely known as "A-901," Tarrats' forgery convictions render the "A-901" license of any company of which he is a principal subject to revocation or, if such a license is pending, to denial. See N.J.S.A. 13:1E-133(b)(11), which concerns denial for conviction of "forgery and fraudulent practices;" N.J.S.A. 13:1E-134(a), which concerns revocation for any cause which would require denial; and N.J.S.A. 13:1E-134(b), which concerns revocation for "fraud, deceit or misrepresentation ... in the conduct of the licensed activity."

62(J) Under N.J.A.C. 7:20-16.24, concerning convicted persons acting as brokers, the Department's policy is "to discourage persons who would be disqualified from obtaining licenses under ["A-901's" supporting regulations] from acting as brokers in the solid waste or hazardous waste activities." The Department is authorized to examine a broker's relationship with an applicant or licensee "in order to determine whether the broker is or has acted as an employee" of that applicant or licensee. The Department is further authorized to "deny or revoke a license if it finds that an

applicant or licensee has set up or maintained a relationship with a broker for the purpose of avoiding disqualification...." Id.

Paragraph 104 of the Administrative Order is hereby amended to read as follows:

104. Pursuant to N.J.S.A. 13:1E-133(b) and N.J.S.A. 13:1E-134(a), in that Daniel Tarrats was convicted of two counts of forgery, as charged in Counts 21 and 26 of the indictment in State v. Tarrats, State Grand July No. 190-87-1, at least one of which (Count 21) was committed within the scope of his authority as an officer of both Flowen Oil and NCD. See Attachment B.

The rest of the Administrative Order is to continue in force in all respects.

Respectfully,

ROBERT J. DEL TUFO
ATTORNEY GENERAL OF NEW JERSEY

By: John A. Covino
John A. Covino
Deputy Attorney General

Attachments
cc: Thomas F. Lowe, Clerk
Harry Carroll, Esq. (NCD/Tarrats)
Mark L. Amsterdam, Esq. (Tarrats)
Richard M. Hluchan, Esq. (Flowen)
Harold S. Okin, Esq. (NCD)
Joan Brown, Esq. (Remtech)
Scott B. Dubin, Esq., DEP
(all w/att)

REFERENCE NO. 43

File 0408B

RECEIVED
AUG 27 1990
GREENSTONE, SOKOL, BEHOT AND FIORENZO

State of New Jersey
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
RICHARD J. HUGHES JUSTICE COMPLEX
CN 112
TRENTON 08625

ROBERT J. DEL TUFO
ATTORNEY GENERAL

KENNETH S. LEVY
ASSISTANT ATTORNEY GENERAL
DIRECTOR

(609) 292-1509

August 21, 1990

Leon Sokol, Esquire
Greenstone, Sokol, Behot and Fiorenzo
39 Hudson Street
Hackensack, NJ 07601

Re: Remtech Environmental (New Jersey), L.P.
Application Under N.J.S.A. 13:1E-126 ("A-901")

Dear Mr. Sokol:

Based upon previous correspondence and our meeting of July 11, 1990, it is the understanding of the Department of Environmental Protection that Resource Management Technologies, Inc. ("Remtech"), which currently holds an "A-901" license, currently has a management agreement with Remtech Environmental (New Jersey), L.P., to manage the assets of the Camden facility formerly operated by Flowen Oil Delaware Valley, Inc., an owner of which is Flowen Energy Corporation, owned by Joe C. Norman. It is also the Department's understanding that Remtech Environmental Group, L.P., is the general partner of Remtech Environmental (New Jersey), L.P., and that a 10 per cent limited partner of Remtech Environmental (New Jersey) L.P. is Mr. Norman. Remtech Environmental (New Jersey) L.P. has filed disclosure statements with the Department pursuant to "A-901."

It is the Department's further understanding that Remtech Environmental (New Jersey), L.P. wishes to become licensed under "A-901."

Kindly be advised, as we set forth at the meeting of July 11, 1990, that the Department will not agree to issue a license to Remtech Environmental (New Jersey) L.P., so long as Mr. Norman has

any interest therein of a type set forth in N.J.S.A. 13:1E-133 or N.J.S.A. 13:1E-134. The Department is currently prosecuting an administrative order and notice of civil penalty assessment against Flowen Oil Delaware Valley, Inc., for substantial regulatory and statutory violations in the conduct of its business concerning the Camden facility. Mr. Norman held a controlling interest and the office of president in Flowen Oil Delaware Valley, Inc., at the time of the alleged violations and, to the Department's knowledge, continues in those capacities.

Very truly yours,

ROBERT J. DEL TUFO
ATTORNEY GENERAL OF NEW JERSEY

By: John A. Covino
John A. Covino
Deputy Attorney General

JAC/jhm

REFERENCE NO. 44

SOKOL, BEHOT AND FIORENZO
COUNSELLORS AT LAW
39 HUDSON STREET
HACKENSACK, NEW JERSEY 07601

(201)488-1300
TELECOPIER
(201) 488-6541

LEON J. SOKOL (N.J., N.Y. & FLA. BAR)
JOSEPH F. BEHOT, JR. (N.J. & N.Y. BAR)
JOSEPH B. FIORENZO (N.J. & N.Y. BAR)

THOMAS S. BOYD, JR.
OF COUNSEL

FRANK A. CAMPANA
JEFFREY A. ZENN (N.J. & D.C. BAR)
CYNTHIA A. CAPPELL
JARED M. LANS (N.J. & MN. BAR)
LEWIS R. SHAFER (N.J. & N.Y. BAR)

September 27, 1990

Deputy Attorney General John A.Covino
Department of Law and Public Safety
Division of Law
Justice Complex
Cn-112
Trenton, New Jersey 08625

Re: Remtech Environmental (New Jersey, L.P.)
A-901 Approval

Dear John:

I am enclosing herein a draft lease by and between Remtech Environmental Group, L.P. and Resource Management Technologies, Inc. It is structured so that all of the net cash flow from operations will be paid to Remtech Environmental Group, in which Joe Norman has no interest. Joe Norman will not have an interest in or receive any revenues from the facility through the lease.

Please review and advise if this is acceptable to your Department and the Department of Environmental Protection. Based upon the new reorganization, I have not sent copies to Scott Dubin or Gerry Burke, as I am not sure as to their continued involvement in this matter. I am enclosing an additional copy for you to pass on to the appropriate person in the Department for review. I would appreciate your notifying me as to the name of that person and telephone number so that my files can be brought up to date.

Thanks and best regards.

Sincerely,

LEON J. SOKOL

LJS/zs
Encls.
CC: Ron Klempner
Paul Fleischmann

REFERENCE NO. 45

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

May 11, 1982

New Jersey Department
Environmental Protection
Solid Waste Administration
32 E. Hanover Street
Trenton, New Jersey 08625

Gentlemen:

By direction of Mr. Al Fralinger, N.J.D.E.P., we wish to report an oil spill at our tank farm.

At approximately 1:00 P.M. on Saturday, May 1, 1982, while transfering oil within our tank farm, a tank was run over resulting in the spill of approximately 20 gallons of used crankcase oil into our contained area. None of the oil ran outside of the containment area. No oil reached storm sewers, sanitary sewers, soil or waterways.

The oil was subsequently pumped out of oru containment area into an adjacent storage tank in the same tank farm area.

We did not construe this incident to be an unauthorized discharge because the tank farm area is totally enclosed by a dike with no outlet.

However, Mr. Fralinger advised that we should report the spill in accordance with Section 12-G, page 5 of our Certificate of Approved Registration and Engineering Design Approval.

We are under negotiations to have tank gauging devices installed to prevent future spills.

If there are any further questions, please call or write to me.

Sincerely,

Ralph E. Stone

Ralph E. Stone
Technical Manager

Facility Registration #6408A

REFERENCE NO. 46

04-35

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

June 7, 1982

New Jersey Department of
Environmental Protection
Solid Waste Administration
32 E. Hanover Street
Trenton, New Jersey 08625

Gentlemen:

At approximately 4:55 P.M. on May 24, 1982, while transfering oil into our tank farm, a tank was overfilled resulting in a small oil spill of about 20-25 gallons. This was reported to Mr. E. Liu of the New Jersey D.E.P.

The oil was contained in our concrete dike area except for a few drops which the wind blew onto the grass outside the wall. The oil on the grass was wiped up with absorbent pads and the oil in the dike area was pumped into another tank.

We have contracted to have tank gauges installed to help prevent future spills.

Sincerely,

Ralph E. Stone/T.M.

Ralph E. Stone/TM
Technical Manager

Facility Registration #6408A

REFERENCE NO. 47

Kathleen - FYI

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

June 7, 1982

New Jersey Department of
Environmental Protection
Solid Waste Administration
32 E. Hanover Street
Trenton, New Jersey 08625

Gentlemen:

At approximately 6:00 P.M. on June 1, 1982 while transfering oil into a tank at our tank farm, a tank was overfilled resulting in a small oil spill of about 25 gallons. The incident was reported to Mr. Kirchof of your office at 6:45 P.M.

The oil was contained in our concrete dike area except for about 5 gallon which splattered onto the ground outside the dike area. Absorbent material was spread on the ground area and subsequently disposed of in a dry waste container.

Our contractor will start to install gauges on our tanks this week. The gauges will help to prevent future spills.

Sincerely,

Ralph E. Stone/TM

Ralph E. Stone/TM
Technical Manager

Facility Registration #6408A

REFERENCE NO. 48

Phone: 609-541-6700
Telex: 834477

Stablex-Reutter Inc.

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

SOLUTIONS START HERE"

November 23, 1982

OIL FILTER SLUDGE ANALYSIS - FLOWEN OIL

Flowen Oil Co.
1800 Carmen Street
Camden, NJ 08101

Attention: Jim Cachassi

Reference: Test Report No. SR7502

This report covers the analysis of one (1) sludge sample submitted to Stablex-Reutter, Inc. (S-R) on October 25, 1982. The analysis adhered to the following publications:

- Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, 1980.
- Determination of Heat of Combustion and Sulfur Content in Petroleum Products, Parr Calorimetric Procedure.
- ASTM D-93, Standard Test Method for Water in Petroleum Products and Bituminous Materials by Distillation.
- Federal Register, May 19, 1980 edition, Characteristic of EP Toxicity.
- EPA-EMSL - The Analysis of Polychlorinated Biphenyls in Transformer Fluids and Waste Oils, June, 1980. (Columns and GC conditions for PCBs).
- Modified Method 601, Federal Register, Vol. 44, No. 233, December 3, 1979. (Modified Method for Total Organic Halogens).

Parameters and analytical results are delineated in the attached table. Should you have any questions, please don't hesitate to call.

Respectfully submitted,

STABLEX-REUTTER, INC.

Catherine M. Ward

Catherine M. Ward
Group Leader, Inorganic Section

CMW/bb

Phone: 609-541-6700
Telex: 834477

Stablex-Reutter Inc.

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

Analytical Results

Raw Analysis

Constituent	SR7502 Sludge Sample
Chloride, ug/g	3900
Water, %	15
pH, units	8.90
Phosphorous, total, as P	46
Sulfur, total, %	0.53
Heat of Combustion, BTU/lb	12,000
Ash, %	18
Chromium, total, ug/g	2.4
Copper, total, ug/g	3.8
Iron, total, ug/g	180
Lead, total, ug/g	1,800
Manganese, total, ug/g	1.2
Molybdenum, total, ug/g	890
Sodium, total, ug/g	2,700
PCBs, as Arochlor 1260, ug/g	10
Total Organic Halogens, as Chloride, ug/g	570

EPA-EP Analysis

Constituent	SR7502 Sludge EPA-EP	EP Toxicity Limit
Arsenic, total, mg/l	<1	5.0
Barium, total, mg/l	0.83	100.0
Cadmium, total, mg/l	<0.1	1.0
Chromium, total, mg/l	<0.1	5.0
Lead, total, mg/l	<0.5	5.0
Mercury, total, mg/l	<0.002	0.2
Selenium, total, mg/l	<1	1.0
Silver, total, mg/l	<0.1	5.0

Phone: 609-541-6700
Telex: 834477

Stablex-Reutter Inc.

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

Quality Assurance Data

Raw Analysis

Sample* + Spike

Constituent	Amount of Spike	% Recovery
Chromium	1.0	110
Copper	1.0	92
Lead	1.0	88
Manganese	1.0	96
PCBs	4.93	120

* The spiked sample was analyzed simultaneously with the sample in this Test Report and can be found in Test Report Nos. SR7515 and WS1661.

EPA-EP Analysis

Sample* + Spike

Constituent	Amount of Spike	% Recovery
Arsenic	1.0	79
Cadmium	1.0	110
Chromium	1.0	95
Lead	1.0	100
Mercury	0.1	120
Silver	1.0	82

* The spiked sample was analyzed simultaneously with the sample on this Test Report and can be found in Test Report No. SR7421.

REFERENCE NO. 49

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

November 24, 1982

Department of Environmental Protection
Bureau of Hazardous Waste
32 E. Hanover Street
CN027
Trenton, New Jersey 08625

Attention: Ernie Kuhlwein

On November 19, 1982 at approximately 12:30 PM tank #4 on our waste oil tank farm discharged approximately 20 gallons. The discharge was contained within our waste oil farm.

The discharge occured when a driver, under supervision from myself, was unloading his vehicle. The vehicle was being pumped into another tank, #6. However, the valve on tank #4 was partially open, this allowed for some oil to pump into tank #4 which contained approximately 14,900 gallons. After 5 minutes of pumping the partially open valve on tank #4 allowed enough oil to seep in which caused the tank to spill approximately 20 gallons out thru the top vent. Immediately upon seeing tank #4 spilling the driver switched off the pump. Upon inspection I saw the open valve (#6)and partially open valve (#4) and realized what had happened. I next relieved some of the head from tank #4 and gave instructions to clean up the spill. After tank #4 was secure I gave the go ahead to finish pumping the vehicle off into tank #6. The area was then cleaned up.

Sincerely,

Jim Caccese

Jim Caccese
Production Manager

JC/tm

REFERENCE NO. 50

Camden

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

January 19, 1983

Division of Waste Management
Department of Environmental Protection
32 E. Hanover Street
CN 027
Trenton, New Jersey 08625

Re: Report of incident at
Flowen Oil Delaware Valley, Inc.
December 17, 1982

Attention: David E. Bute

At 5:40 AM on December 27, 1982 our Process Operator Robert Rittner arrived for work. On going around the site he heard splashing in the finished product area. He immediately investigated and found that tank sampling valves on all four finished product tanks had been opened, and oil was being discharged into the tank containment area. On checking the raw material tanks the same situation was found.

He immediately called the writer and informed him of the situation. He then set about closing all the open valves. As mentioned previously, all four finished product tanks had been opened and the valves on the raw material tanks numbers 1 thru 9 had also been opened.

All the spilled oil had been discharged into the tank containment areas, with none escaping to the surrounding land or Flowen site.

At 6:50 AM the writer arrived on site and personally set about organizing the return of raw material to the storage tanks. This job was completed at approximately 1 PM and we returned 41,000 gallons of product to storage.

At approximately 7:30 AM the writer interviewed the guard on duty from K-9 Guard Service, 1102 Fairview St., Camden, N.J. 08104 who claimed to have heard nothing during his term of duty from 8 PM Sunday, December 26th to the time of the interview.

At approximately 8 AM the Camden City Police Department were informed of the incident and at approximately 8:30 AM Patrolman A. George from the department arrived to make a preliminary report.

At 7:30 AM the collection drivers arrived to start their days work and it was then discovered that all four collection vehicles had been tampered with. In three out of four cases, ignition keys had been removed, and in all four cases parts of the brake airline system around the rear axles had been removed, thereby immobilizing the vehicles.

At approximately 9 AM Ms. Susan Savoca at the Department of Environmental Protection in Trenton was informed of the incident. She stated that she would have an inspector call to make a report. At approximately 10 AM David E. Bute from DEP arrived on site, investigating an oil discharge into the Cooper River. After contacting his office he also agreed to investigate and report on the spill as here reported.

At approximately 1 PM we started moving products from the finished product containment area and moved it to raw material storage for reprocessing. We removed approximately 15,000 gallons from the finished product area. This job was completed at approximately 4 PM.

We restarted production at approximately 5 PM.

The net result to Flowen Oil of the incident was that a delay of approximately two days occured. One day was spent replacing spilled oil into tanks, and the second day was spent reprocessing the oil spilled into the finished product area.

In addition to this, approximately 11 trucking days were lost due to the time required to repair the trucks, and the delay in obtaining certain spare parts. Also 12 man days were lost due to the work required in cleaning up after the oil had been returned to storage tanks, and the lack of truck availability.

Certain steps have been taken in order to make the Flowen Oil site more secure during the hours of darkness. Firstly a guard dog was introduced between the hours of 10 PM and 8 AM, tethered on a long leash. This dog should give the guard also on duty a warning that when strangers are on or around the site. Additionally, other security measures are being investigated which will give an electronic and/or audible warning when entry is made or attempted to the site.

This incident although most disruptive to Flowen Oil caused no hazard or nuisance to Flowen Oil's neighbors. All the spilled oil was contained within the tank containment areas, and no nuisance or danger was caused through fumes or smell in the atmosphere.

Sincerely yours,

Archie Bilsland
Manager

AB/tm

REFERENCE NO. 51

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

April 11, 1983

Department of Environmental Protection
Bureau of Hazardour Waste
32 East Hanover Street
Trenton, New Jersey 08625

Attention: Ernie Kuhlwein

Dear Mr. Kuhlwein:

On March 30, 1983 Flowen Oil Delaware Valley experienced a temporary failure of one of five oil-water separators. This failure led to the discharge of approximately 25 gallons of oil to the City storm drain system. The separators purpose is to contain any oil spilled on the plant site while allowing the water to flow to the City water system.

The water discharge pipe for this interceptor became clogged with some sludge. This allowed the water to back-up causing the oil to discharge into the water stream through an overflow. This discharge was noted by the Camden City Water Department at approximately 10:15 A.M. Within 15 minutes of learning of the problem, it was corrected by Flowen Oil Delaware Valley Incorporated. Along with correcting the problem the necessary steps were taken to insure that the problem never re-occurs. This is the first and only time there was oil discharged into the City system.

Sincerely,

James Caccese/sw

James Caccese
Production Manager

JC/sw

REFERENCE NO. 52

HW00133

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
120 Rt. 156, Yardville, N.J. 08620

JACK STANTON
DIRECTOR

LINO F PEREIRA
DEPUTY DIRECTOR

June 16, 1983

RECEIVED JUN 2 0 1983

Archie Bilsland
Flowen Oil Delaware Valley, Inc.
1800 Camden Street
Camden, New Jersey

Re: Penalty Settlement Offer

Dear Mr. Bilsland:

Attached is an Administrative Order concerning a violation of the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq and regulations promulgated thereunder, specifically N.J.A.C. 7:26-7.6(a)2, 7.6(a)3 and 7.6(b)1.

Pursuant to the terms of the Administrative Order, the violations must be corrected and the rules and regulations of this Department must be complied with by the specified date.

In addition, a penalty settlement offer of $300 will be held open until July 16, 1983 to allow for an amicable resolution of this statutory claim for the referenced violation. Be advised that N.J.S.A. 13:1E-9c provides for a maximum civil penalty of $25,000 per day for violations of this nature.

In the event of non-compliance with the Administrative Order and/or non-acceptance of this penalty settlement offer, this matter will be referred to the Office of the Attorney General for the initiation of litigation to enforce the Order and seek the full penalties allowed by law.

Should you wish to discuss the specifics for acceptable compliance with these directives, contact John Barry at (609) 984-3695.

Be advised that such discussion will not automatically delay or otherwise extend the deadline for compliance with the Administrative Order.

Very truly yours,

Joseph A. Rogalski
Assistant Director

lmc
Attachments

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
120 Rt. 156, Yardville, N.J. 08620

JACK STANTON
DIRECTOR

LINO F PEREIRA
DEPUTY DIRECTOR

June 16, 1983

(IN THE MATTER OF)
(FLOWEN OIL DELAWARE VALLEY, INC.)

ADMINISTRATIVE ORDER

The following FINDINGS are made and ORDER is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (Department) and duly delegated to the Assistant Director for Enforcement and Field Operations, Division of Waste Management, under the Solid Waste Management Act, N.J.S.A. 13:1E et seq.

FINDINGS

1) Flowen Oil Delaware Valley, Inc., is operating a hazardous waste facility as defined by N.J.S.A. 13:1E-3(h) and N.J.A.C. 7:26-1.4 at Lot 1, Block 1431 in the City of Camden, New Jersey, (hereinafter "Flowen Oil").

2) The aforementioned facility was granted a five (5) year certificate of approved registration and Engineering Design approved on June 10, 1982. (Facility #6408A)

3) On February 8, 1983 during the course of routine facility inspection at the above referenced facility a departmental investigator observed the following violations:

   a) Flowen Oil accepted a shipment of hazardous waste which was accompanied by an improperly completed manifest, specifically Flowen Oil accepted a shipment of waste oil from Marisol accompanied by New Jersey manifest #NJ0146745, said manifest indicated an incorrect USDOT shipping name and EPA waste type, in violation of N.J.A.C. 7:26-7.6(a)2.

   b) Flowen Oil failed to notify the Department in writing of the above referenced manifest discrepancy,

indicated in FINDING 3-A, within one week, a violation of N.J.A.C. 7:26-7.6(a)3.

c) Flowen Oil failed to sign and date the manifest, indicated in FINDING 3-A, upon receipt of the waste shipment, a violation of N.J.A.C. 7:26-7.6(b)1.

4) The Department's Solid Waste Management Rules, specifically N.J.A.C. 7:26-7.6(a)2, 7.6(a)3 and 7.6(b)1, provide that:

N.J.A.C. 7:26-7.6 Hazardous Waste Facility Operator Responsibilities (a) General requirements are as follows:

2. Except as hereinafter provided, the facility operator shall only accept hazardous waste shipments which are properly labeled and marked in accordance with these rules, and which are accompanied by a properly completed manifest unless no manifest is required pursuant to N.J.A.C. 7:26-8.1 et seq.

3. The facility operator may accept a hazardous waste which appears to be other than the quantity or waste type described in the manifest, provided the facility is authorized to accept such waste. The facility operator shall notify the Department in writing of such a manifest discrepancy within one week describing the nature of the discrepancy and the arrangements made for the disposition of the waste.

N.J.A.C. 7:26-7.6(b) If a facility receives hazardous waste accompanied by a manifest, the owner or operator, or his/her agent, must:

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.

ORDER

"NOW, THEREFORE, IT IS HEREBY ORDERED" that Flowen Oil Delaware Valley, Inc. its, principals, agents, employees, successors, assigns, tenants, and any receiver or trustee in bankruptcy, (should such an entity be appointed to take control of the facility which is the subject of this Order) shall:

5) Immediately cease acceptance of hazardous waste accompanied by improperly completed manifests.

6) Notify the Department within one week, in writing, of any discrepancies found on a hazardous waste manifest to the Bureau of Hazardous Waste Classification and Manifest, 32 East Hanover Street, Trenton, New Jersey 08625.

BE ON NOTICE that the maximum civil penalty for violations of the Solid Waste Management Act on an ORDER issued pursuant thereto is $25,000 per day.

Joseph A. Rogalski
Assistant Director

JB:lmc

REFERENCE NO. 53

0408

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
120 Rt. 156, Yardville, N.J. 08620

JACK STANTON
DIRECTOR

LINO F. PEREIRA
DEPUTY DIRECTOR

17 JUN 1983

Archie Bilsland
Flowen Oil Delaware Valley, Inc
1800 Canden Street
Camden, NJ

RE: Notice of Violation

Dear Mr. Bilsland:

Pursuant to the Solid Waste Management Act, N.J.S.A. 13:1E-1, et seq., and regulations promulgated thereunder, specifically N.J.A.C. 7:26-12.3(e)2, 9.3(a)3, the following findings of fact are made:

FINDINGS

1. Flowen Oil Delaware Valley, Inc., is operating a hazardous waste facility as defined by N.J.S.A. 13:1E-3(h) and N.J.A.C. 7:26-1.4 at Lot 1, Block 1431, in the City of Camden, New Jersey (hereinafter "Flowen Oil")

2. The aforementioned facility was granted a five (5) year certificate of approved registration and Engineering Design approved on June 10, 1982 (Facility #6408A).

3. On February 24, 1983 and April 21, 1983, during the course of routine facility inspection at the above referenced facility, a Departmental Investigator observed the following violations:

   a) Flowen Oil installed a new treatment process without notifying the Department. Specifically, Flowen Oil installed a new heat coil treatment system, a violation of N.J.A.C. 7:26-12.3(e)2.

   b) Flowen Oil failed to mark drums containing waste oil sludge with the accumulation starting date, a violation of N.J.A.C. 7:26-9.3(a)3.

4. The Department's Solid Waste Management Rules, specifically N.J.A.C. 7:26-12.3(e)2 and 9.3(a)3 provide that:

> N.J.A.C. 7:26-12.3(e)2 Any person operating an existing hazardous waste facility prior to final disposition of a permit application pursuant to this subchapter shall comply will all conditions and requirements of any Approved Registration and Engineering Design Plan issued to the owner or operator of the facility.
>
> N.J.A.C. 7:26-9.3(a) A generator may accumulate hazardous waste on site without a permit for 90 days or less provided that:
>
> 3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

These violation have been recorded as part of the permanent enforcement history of your facility.

The Department of Environmental Protection has chosen not to prosecute the violations noted on the above date but does not relinquish its right to do so in the future.

This letter will serve to advise you that any further violations of N.J.A.C. 7:26-1 et seq., are subject to a maximum penalty of $25,000 per day in accordance with N.J.S.A. 13:1E-9.

Should you have any questions regarding this matter, contact Charles Krauss at (609) 859-2958.

Very truly yours,

Joseph A. Rogalski
Assistant Director

JB:kas

REFERENCE NO. 54

ADM-012

MEMO

NEW JERSEY STATE DEPARTME.. OF ENVIRONMENTAL PROTECTION

TO Ronald T. Corcory

FROM Steve Carfora SC DATE 10/3/83

SUBJECT Flowen Oil and William Uhl

On Monday, 8/29/83 and Thursday, 9/1/83, I had telephone conversations with Al Pierce, a lawyer and regional representative, who is employed by Flowen Oil of Camden, NJ (609-966-4633 or 609-962-7100). Pierce obtained my name and phone number through John Purvis who used to work for the NJDEP and is now employed by the Camden County Solid Waste Department. The information Pierce gave me is summarized below. It may be of interest to BFO's Southern Field Office and possibly to the Division of Criminal Justice (DCJ).

When Pierce called on 8/29/83, he was quite agitated about the fact that Flowen had recently hired someone named William Uhl to be plant manager. He felt that Uhl had a bad reputation and was worried about the possibility that the NJDEP might try to revoke Flowen's hazardous waste transporter license and/or facility permit because someone with Uhl's background and reputation was now associated with Flowen.

Pierce said that Uhl was previously, and possibly still is, in the waste oil transporting business in New York and Pennsylvania. At least one company Uhl is connected with is Central Waste Oil of Rochester, NY. Pierce also mentioned a Pottstown, PA location.

Pierce said that Uhl approached and negotiated with Flowen's majority stockholders who are based in Texas and who are responsible for operating the Camden plant and arrived at an agreement which included the following, and possibly other, conditions:

1. Uhl was named general manager of Flowen's Camden facility and was given authority over the day to day operation of both the facility and the waste transportation end of the business.

2. Uhl leased 10 of his Central Waste Oil waste oil transporting vehicles to Flowen and these vehicles were in turn licensed with the NJDEP to haul waste oil under Flowen's name. According to Pierce, one condition of this leasing arrangement was that Uhl be named general manager.

Pierce was very concerned about the above agreement because:

1. Even though Uhl's background and experience is as a waste hauler and not as a facility operator, Uhl insisted on being given the authority to run the facility.

2. He was concerned that Uhl may pick up some "bad" loads of waste oil and bring them to Flowen.

On 9/1/83, Pierce called me back and informed me that he gave Uhl a 30 day termination notice the day before (Wednesday, 8/31/83). He was able to do this, he said, because he convinced the Texas stockholder group that if

Flowen Oil and William Uhl

Flowen wants to maintain a good image it should not employ someone with Uhl's questionable background. Pierce said that Flowen will no longer lease Uhl's vehicles but will attempt to purchase them outright. He also said that, in connection with this matter, Joseph C. Norman, a representative from the Texas stockholder group, was coming to the Camden facility on September 12.

On Monday, 9/26/83, I contacted Leonard Tritt of the Pennsylvania Department of Environmental Resources (PADER). He gave me the following information about Uhl which he personally knew about or which he obtained from Frank Murphy of the New York Department of Environmental Conservation (NYDEC).

Central Waste Oil, Inc. (CWO) is owned by Uhl. It is headquartered in Rochester, NY and has a terminal in Pottstown, PA. Uhl has a number of suspected or confirmed connections with other waste oil firms, namely:

1. Smith & Lockwood Oil (Uhl's sister-in-law, Lois Smith, is a business partner with Hoot Lockwood in this company)

2. Berks Associates (of Pennsylvania)

3. Booth Oil (NY)

4. Monoco Oil (NY)

5. Calleia Brothers (NY)

Tritt said that the NYDEC considers CWO "somewhat shaky" and CWO is the subject of some suspicions and/or investigations in PA and NY.

Comments

My major concern about this matter is that someone might have been behind Uhl's efforts to get a position of responsibility with Flowen, or may have even coerced Uhl to do what he did. This is where DCJ may come in.

REFERENCE NO. 55

Source file white copy

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

NOTICE OF VIOLATION

ID NO. 0408 B DATE 11/3/83

NAME OF FACILITY Flowen Oil Delaware Valley Inc

LOCATION OF FACILITY 1800 Carman Ave. Camden, N.J.

NAME OF OPERATOR Jim Caccese, Production Mgr.

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

DESCRIPTION OF VIOLATION ① Flowen Oil trucks with licence plate #'s XD76KS - no vehicle letters on end of SWA reg. number and XD81KS - no SWA number on truck.
② Manifests NJ 0191994, 0192205, and 0161214 do not have generator EPA ID numbers.

Remedial action to correct these violations must be initiated immediately. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Bruce Venny

Investigator, Division of Waste Management
Department of Environmental Protection

REFERENCE NO. 56

DWM-002

NEW JER... DEPARTMENT OF ENVIRONMENTAL PR... CTION
DIVISION OF WASTE MANAGEMENT

NOTICE OF VIOLATION

ID NO. 04-08B DATE 12/9/83

NAME OF FACILITY Flowen Oil Del. Val. Corp.

LOCATION OF FACILITY 1800 Carman Ave. Camden

NAME OF OPERATOR Jim Caecese

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

DESCRIPTION OF VIOLATION Excessive amounts of oil on ground around incoming tank farm. This violation also noted on report of 11/17/83.
(Added at Red Lion Office after inspection) ~~two~~ violation of SPC 7:26-9.2(A)2 and NJSA 58:10-23.11c, NJSA 58:10-23.11e

Remedial action to correct these violations must be initiated immediately. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Bruce Vemy
Investigator, Division of Waste Management
Department of Environmental Protection

REFERENCE NO. 57

DWM-002

NEW JER. DEPARTMENT OF ENVIRONMENTAL PRC CTION
DIVISION OF WASTE MANAGEMENT

NOTICE OF VIOLATION

ID NO. 04-088 DATE 12/15/83

NAME OF FACILITY Flower Oil Del. Val. Corp.

LOCATION OF FACILITY 1800 Carman Ave Camden

NAME OF OPERATOR Jim Caccese

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

DESCRIPTION OF VIOLATION ① Excessive amount of oil on ground on the Carman Ave side of the incoming Tank farm. This violation noted in reports of 11/17/83 and 12/9/83.
② Daily inspection log not kept up to date – last entry 12/13/83.

Remedial action to correct these violations must be initiated immediately. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Bruce Henry

Investigator, Division of Waste Management
Department of Environmental Protection

REFERENCE NO. 58

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

January 12, 1984

Mr.Ben Esterman
New Jersey Department of
Environmental Protention
Division of Waste Management
32 E. Hanover Street
CN-027
Trenton, New Jersey 08625

Dear Esterman,

On January 11, 1984 a Yardman overfilled tank #2 in our waste oil form. He was unloading a truck into #2 and did not realize how full the tank was when he started. Approximately 25 gallons was discharged. The entire discharge was contained within our waste oil form. Appropriate steps were taken to clean up the mess.

Sincerely,

James Caccese

James Caccese
Production Manager

JC/sw

REFERENCE NO. 59

Form VSC-005
6/82

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

0408B

INCIDENT REPORT

D.W.M. ASSIGNED CASE NUMBER 84-03-07-0215	HOT LINE ☐	INDEXED ☐
DATE 3-7-84	TIME (Military) 1435	D.W.M. ID NO. 12015

INCIDENT REPORTED BY:

NAME Jim Caccese thru Trenton Dispatch		PHONE 365-5544
AFFILIATION		CODE
STREET		
CITY	STATE	ZIP CODE

INCIDENT LOCATION:

NAME FLOWER OIL		PHONE	
STREET 8101 CARMEN AVE		UTM VERT	UTM HORIZ
CITY CAMDEN	COUNTY	STATE	ZIP CODE

SOURCE OF SPILLED AND/OR DISCHARGED SUBSTANCE: Confirmed ☐ Alleged ☐ More Than 1 Source ☐

COMPANY NAME Same as IL		PHONE	
CONTACT	TITLE		
STREET		DEP COMPANY NO.	
CITY	COUNTY	STATE	ZIP CODE

SUSPECTED SPILLED AND/OR DISCHARGED SUBSTANCE: Confirmed ☐ Alleged ☐ More Than 2 Substances ☐

1. Waste Oil			SUBSTANCE NO.
AMOUNT SPILLED 15-20 gallons	UNITS	A/P/E	S/L/G/M
2.			SUBSTANCE NO.
AMOUNT SPILLED	UNITS	A/P/E	S/L/G/M

DATE OF INCIDENT 3-7-84	TIME (Military) 1-2 AM	TEMP.	WEATHER	WIND (Dir. & Vel.)

SPILL ORIGIN Ruptured hose in contained area	CODE
CAUSE	CODE
WATER BODY AFFECTED	CODE
ASSOCIATED FIRE AND/OR HAZARDS	

INCIDENT REFERRED TO:

AGENCY	PHONE
CONTACT	AGENCY CODE

PRIMARY D.W.M. INVESTIGATOR 12015 Assigned to Venner	FOLLOWUP ☐
NO FURTHER ACTION	DATE 3-7-84

COMMENTS:

Material went into sewer system and about ½ drum recovered
According to Trenton Dispatch spill was reported at 1423 hrs

REFERENCE NO. 60

1-S 00138

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
120 Rt. 156, Yardville, N.J. 08620

DR. MARWAN M. SADAT, P.E.
DIRECTOR

LINO F. PEREIRA
DEPUTY DIRECTOR

MAR 19 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION
AND OFFER OF SETTLEMENT

DWM Case #83-12-15-04S

Flowen Oil Delaware Valley Corp.
William T. Cahill Jr., Registered Agent
25 Chestnut Street
Haddonfield, New Jersey 08104

Dear Mr. Cahill:

On or before December 15, 1983, as a result of negligence, on the part of Flowen Oil, a hazardous substance (waste oil) was discharged, at the Flowen Oil Facility, located at 1800 Carmen Avenue, Lot 1, Block 1431, in the City of Camden, Camden County, onto the ground from which it might flow or drain into the waters of the State of New Jersey.

The incident summarized above was investigated by members of the Division of Waste Management, who determined that the following provisions of the Spill Compensation and Control Act and regulations promulgated thereunder were violated:

N.J.S.A. 58:10-23.11c	Discharging Hazardous Substances
N.J.S.A. 58:10-23.11e/ N.J.S.A. 58:10-23.11u	Failure to Immediately Notify the Department of the Discharge [See N.J.A.C. 7:1E-2.1(a)]

The above cited violations carry maximum statutory civil penalties of $25,000 per day for each violation.

In accordance with the recommendations of the Department of Environmental Protection, and pursuant to the authority vested in me as Administrator of the New Jersey Spill Compensation and Control Fund by N.J.S.A. 58:10-23.11q, I am amenable to compromise and settle these claims for penalties for the sum of $2,375.00.

Should you decide to settle this matter, payment must be made within fifteen (15) days of your receipt of this letter. Payment must be sent to the Administrator, New Jersey Spill Compensation Fund, Department of Treasury, 135 West Hanover Street, Trenton, New Jersey 08625. Only checks or money orders drawn to the order of "New Jersey Spill Compensation and Control Fund" will be accepted. Your cancelled check or money order will serve as your receipt.

Should you decide not to accept this settlement offer or fail to forward payment within fifteen (15) days of receipt of this letter, this offer is rescinded, and this matter will be referred to the Office of the Attorney General with instructions to initiate a legal action for the maximum allowable penalty.

Acceptance of this settlement offer will satisfy your liability for civil penalties in connection with the above cited violations but will not relieve you of any other responsibility or obligation under the law, including the responsibility to pay for any damages which may have been caused by the discharge.

If you wish to make any inquiries or discuss this settlement offer, you may contact David J. Shotwell, Chief, Bureau of Compliance and Enforcement, Division of Waste Management, at 120 Route 156, Yardville, New Jersey 08620 or at (609) 292-5560.

Very truly yours,

Administrator,
New Jersey Spill Compensation and Control Fund

Recommendation Approved By:

Joseph A. Rogalski
Assistant Director
Division of Waste Management
N.J.D.E.P.

F01:F013:lmc

REFERENCE NO. 61

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
SOUTHERN REGION

Date: 4/19/84
Time Arrived: 1000
Time Departed: 1130

Facility Name: Flowen Oil Delaware Valley Corporation
Address: 1800 Carman Avenue, Camden, N.J. 08105
Facility Type: Treatment, Storage, Reclamation
EPA ID #: NJD980536577
Lot: 1

Facility Representative: Jim Caccese
Position: Operator
Inspector: Bruce Venner
File No.: 0408B
Block: 1431

Weather Conditions: Mostly Sunny / occasional rain Wind Direction: W Speed: 5-10 MPH: Temp: 55°F

Operating Authorization

Facility is operating under (type of authorization): AED-CAR

Summary of Inspection (check appropriate statement)

Facility: is in compliance with operating authorization: ✓
is not in compliance with operating authorization: ___

Facility: is in compliance with NJAC Title 7, Chapter 26: ✓
is not in compliance with the following statute provision(s): ___

Overall housekeeping: Poor ___ Fair ✓ Good ___

Inspection Observations

	Yes	No	N/A
1. Does the treatment process (including storage tanks) system show any signs of ruptures, leaks, or corrosion? If yes, explain.		✓	
2. Spills. If yes, explain. On 4/17/84 a hose ruptured causing a spill - see comment #1.	✓		
3. Odors. If yes, explain. normal process odors	✓		

Container Storage: (7:26-9.4(d)

Drum No. 3 Stack Height 1 Storage Methods on concrete

Do the containers appear to be in good condition, not in danger of leaking: If no, explain in detail.		✓	
Are all containers closed except those in use?		✓	
Are incompatible wastes stored separate from each other?		✓	
Adequate aisle space?		✓	
Are containers stored according to waste characterization?		✓	

	Yes	No	N/A
Is each contianer marked or labeled with the words "Hazardous Waste" and in compliance with the DOT labeling requirements:			
- generator name	✓		
- address	✓		
- UN, NA number	✓		
- DOT shipping name	✓		
- EPA ID number	✓		
- manifest number	✓		
- accumulation start date	✓		

Vehicles: (7:26-7.1 and 7.5)

Valid registration card			✓
Numbers displayed			✓
Properly placarded			✓

Manifests: (7:26-7.4, 7.5 and 7.6)

Does each manifest have the folliwng information?

The generators name, mailing address, telephone number, EPA ID number and signature?	✓		
The transporters name, EPA ID number and signature?	✓		
SWA transporter registration number?	✓		
The name, address, EPA ID number of the designated facility and signature?	✓		
description of the wastes (DOT)?	✓		
The total quantity of each hazardous waste?	✓		
Is the generator received signed copies (fromthe TSDF) of all the manifests for waste shipped off site more than 35 days ago?	✓		

Record Keeping: (7:26-9.4 (f and i)

Are the following being kept properly?

Daily inspection log?	✓		
Daily operating log?	✓		
Waste inventory log?	✓		

Samples taken: yes (no) number of samples
DEP ID#

Photographs taken: yes (no)

Bruce Venner
Signature of Inspector

N. Coccia
Signature of Facility Representative

FACILITY NAME Flower Oil Del. Val. Corp.

DATE OF INSPECTION 4/19/84

EPA ID # NJD980536577

FILE NO. 0408B

COMMENTS, OBSERVATIONS, SUMMARY

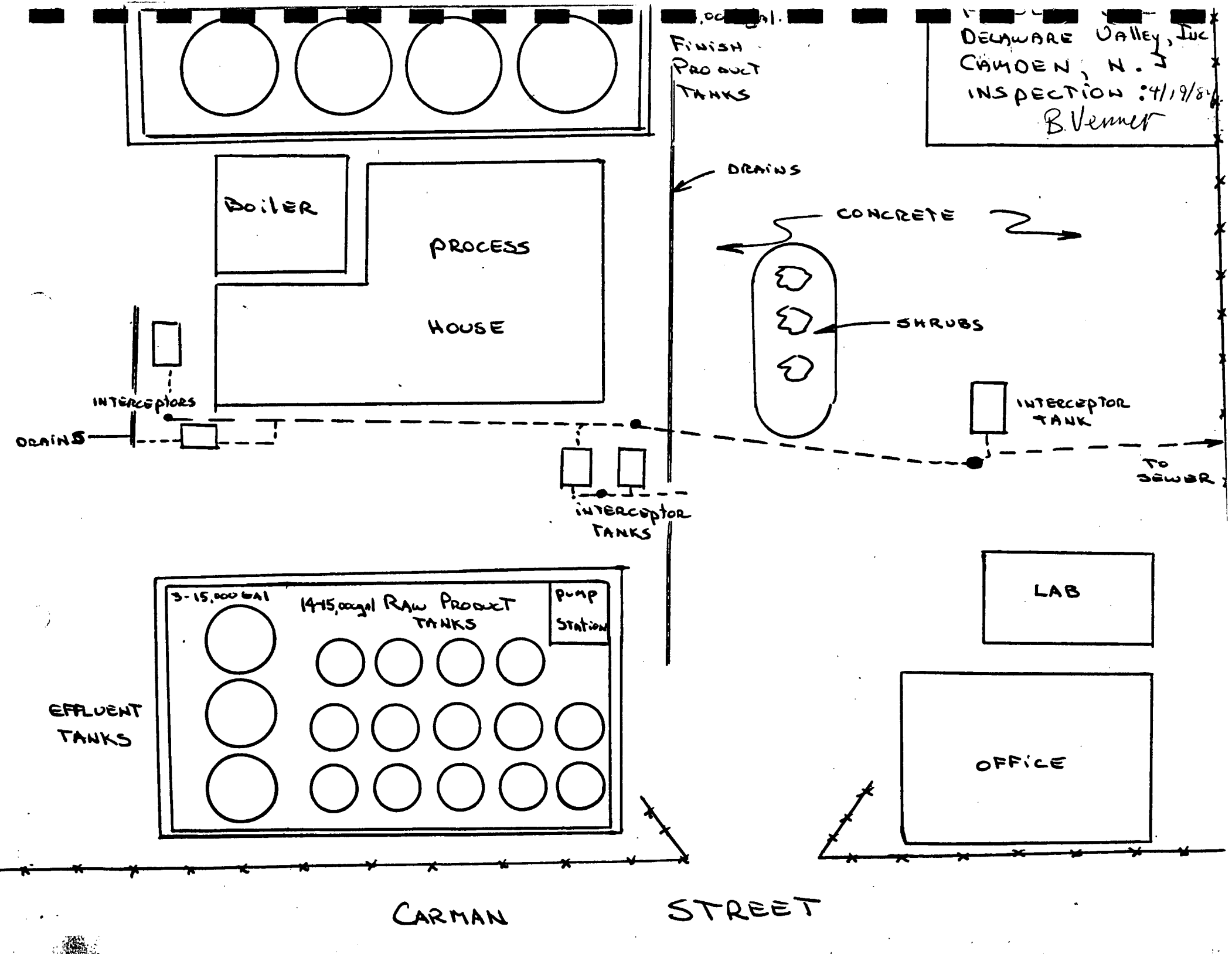
① A hose ruptured on 4/17/84 resulting in a spill outside the containment area The spilled material was cleaned up and placed in sludge drums and are currently being stored on site. No violation issued.

② Boiler pump repaired and operational.

③ New level control box installed on the experimental break tank. New system utilizes a variable speed pump as opposed to the 2 speed pump. Bubbler system still operational but will be disconnected as soon as new level control is hooked up.

Bruce Venney
Signature of Inspector

Signature of Facility Representative


DELAWARE VALLEY, INC
CAMDEN, N.J.
INSPECTION: 4/19/84
B. Venner
FINISH PRODUCT TANKS
DRAINS
BOILER
PROCESS HOUSE
CONCRETE
SHRUBS
INTERCEPTORS
DRAINS
INTERCEPTOR TANK
TO SEWER
INTERCEPTOR TANKS
3-15,000 GAL
14-15,000 gal RAW PRODUCT TANKS
PUMP STATION
EFFLUENT TANKS
LAB
OFFICE
CARMAN
STREET

File Number 0408B

CONFIDENTIAL

Recommendations

Subject: Flower Oil Del Val Corp. Date: 4/19/84

I do not recommend any administrative action as a result of this inspection.

REFERENCE NO. 62

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

July 26, 1984

NJ DEP
Southern Regional Office
100 Larwin Road
Cherry Hill, NJ 08034

Attention: Mr. David Bute

Report of Spill

At approximately 6:00 AM on July 25, 1984, a spill of Flowen Oil (recycled used oil) occured at the corner of Haddon Avenue and Market St. in the City of Camden, NJ.

The driver of the vehicle Richard Murphy, immediately notified our Camden facility and a vehicle was dispatched to pick up as much oil as possible. Camden City Police Officer D. Darwerk Badge # 515 attended and called on the Camden County Highway Department to clean up the oil spilled on the highway, an amount of approximately 5 gallons. They attended the scene and sanded the oil, none of which entered the City sewer system.

The vehicle in question a Ford tractor license plate # XE85JP and the 7000 gallon trailer were returned to our facility at Carman Street and all remaining oil was cleaned off before the vehicle resumed its schedule.

The reason for the spill was that a 3" cap on the top of the trailer had been left off and on turning from Haddon Ave. to Market St. some oil had come out of the opening pipe.

David Bute the Duty Officer at DEP Southern Field Office telephone number 609-859-2958 was contacted and the spill reported.

Environmental Protection Agency Region II Office New York City, John LaPadula telephone number 212-548-8730 was contacted and given the requested information on the spill.

Our own employees then sweep up and collected the contaminated sand and returned it here to our Camden location where it is presently in drums. It will be disposed of through our normal solid waste contractor, Delaware Container Co. Inc. (West 11th Ave. and Valley Road, Coatsville, PA. telephone number 215-383-6600, contact person - Mike Canale) under a New Jersey Hazardous Waste Manifest.

In conclusion the spill was dealt with in a satisfactory manner with no residue remaining and the resultant contaminated material will be disposed of through the correct channels. No danger exists to water ways since none of the oil was spilled near a city sewer, and no rain fell during the incident, or the subsequent cleanup operation.

Sincerely yours,

Archie Bilsland
General Manager

AB/sw

REFERENCE NO. 63

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

August 9, 1984

Mr. Ben Esterman
New Jersey Department of
Environmental Protection
Division of Waste Management
32 E. Hanover Street
CN-027
Trenton, NJ 08625

Dear Mr. Esterman,

On August 6, 1984 we experienced a tank overfill. This occured at approximately 4:45 pm while an operator was transferring material from B tank into tank 12. Approximately 15-20 gallons of oil was discharged thru the air vent on top of tank 12.

The DEP was notified immediately at the 24 hour emergency spill phone number. The spill was cleared up within 4 hours. Please feel free to contact me if I can be of further service in this matter.

Sincerely,

James Caccese

James Caccese
Production Manager

JC/sw

REFERENCE NO. 64

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

October 8, 1984

Mr. Ben Esterman
NJDEP
Division of Hazardous Waste Engineering
32 East Hanover Street
Trenton, NJ 08625

Dear Mr. Esterman,

On September 10, 1984 at approximately 10:30 am Tank #6 in our waste oil farm, was overfilled. Approximately 75 to 100 gallons of material was discharged. This happened within a contained area therefore there was no danger to the environment and no hazard to human health. No injury occured during this discharge.

This overfill was caused by a Yardman not paying attention to his duties while the tank was being filled from a vehicle unloading. There was no mechanical failure of the level indicator in the tank.

The excess oil was immediately squeeged into the sump area of the tank farm. From here it was pumped into tank #4. The tank exterior was then high pressured washed to clean off any oil residual left. All the material that was discharged was recovered.

The problem of tank overfill has been a recurring problem. The steps outlined in my letter of September 7, 1984 had not yet been fully implemented when this incident occured. However, after this incident we had various training sessions in which safety, emergency and most importantly tank overfills were discussed. These sessions were attended by all plant employees. Also, the employee who was responsible for this overfill was given a letter of reprimand.

These steps will deter this problem from happening in the future.

Sincerely,

James Caccese

James Caccese
Production Manager

JC/sw

REFERENCE NO. 65

0408B

Flowen Oil Delaware Valley Inc

1800 Carman Street, Camden, N.J. 08105 • Telephone (609) 365-5544

Frank,
FYI → File

August 21, 1985

Department of Environmental Protection
Division of Waste Management
Southern Field Office
RD #1, Route 70
Vincentown, NJ 08088

Attention: Mr. Frank Hartman

Re: Spill Incident
EPA ID # NJD980536577

Dear Mr. Hartman:

Please find attached a report of a spill which was reported to Mr. Bruce Venner at your office by telephone at approximately 10:30 AM on August 21, 1985.

Sincerely yours,

Archie Bilsland
General Manager

AB/ssw

Enc.

SPILL INCIDENT Date 8/20/85

Bob Rittner called me at home at approximately 8:30 PM on above date and reported the following:

Camden City Fire Department had been called to a spill at 29th and Federal, Camden, yard of Penn Jersey Auto, at a location where we store 2 empty trailers. Valve had been opened by vandals and oil (perhaps 10 gallons) has been spilled onto ground (asphalt) and a small amount (perhaps 2 gallons) had spilled onto neighbors land adjoining. Local resident had called out fire service who called out Bob Rittner. Rittner had J. Leech cleaned up all free oil, none of which entered city sewer system.

On the morning of 8/21/85, the contaminated dirt on the resident's land was drummed (approximately ½ drum) and the dirt will be replaced at the earliest opportunity.

A few months ago, a resident of a property adjoining the Penn-Jersey facility approached the Camden City Fire Service with concern over the tank-trailers parked at the Penn Jersey facility. At that time, we visually inspected the trailers and drained the residual oil contained in the tanks. The fire marshall declared himself satisfied that no potential for oil spillage existed. In the intervening period a person or persons unknown has placed approximately 500 gallons on one of the trailers without our knowledge or authority, and it was the oil which created the spill incident.

We have now removed the two tank trailers from the Penn Jersey facility and parked them at our main Camden recycling facility.

REFERENCE NO. 66

0408B

Form VSC-005
4/85

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

INCIDENT NOTIFICATION REPORT

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

DATE 03-07-86 TIME 1334 (Military) 1345 REC'D BY 1460 PHONE NO.

INCIDENT REPORTED BY: CASE NO. 86.03.07.02 S

NAME Mr. Bilsland thru TD PHONE
STREET 1800 Common St
CITY Camden STATE
AFFILIATION

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

INCIDENT LOCATION:
NAME (Site) Flowen oil ☐ UNK PHONE 365-5544
STREET
CITY Camden COUNTY Camden STATE ZIP CODE

STATUS AT SCENE OF INCIDENT: spill in tank containment area - being cleaned up by company DATE OF INCIDENT: 03-07-86 TIME: 1130

ANYONE HOSPITALIZED ☐ YES ☑ NO POLICE AT SCENE ☐ YES ☑ NO
AREA EVACUATED ☐ YES ☑ NO FIREMAN AT SCENE ☐ YES ☑ NO
CONTAMINATION OF ☐ AIR ☑ LAND ☐ WATER ASSISTANCE REQUIRED ☐ YES ☐ NO
PUBLIC EXPOSURE ☐ YES ☐ NO
RECEIVING WATER POTABLE WATER SOURCE ☐ YES ☐ NO
WIND DIRECTION LOCATION TYPE ☐ CITY ☐ INDUSTRIAL ☐ RURAL

SOURCE OF INCIDENT/PROBLEM: ☑ KNOWN ☐ UNKNOWN

COMPANY NAME same as 1L PHONE
CONTACT TITLE
STREET
CITY COUNTY STATE ZIP CODE

IDENTITY OF SPILLED AND/OR DISCHARGED SUBSTANCE: ☑ KNOWN ☐ UNKNOWN

NAME OF SUBSTANCE recycled oil
AMT. 6500-7000 G/P/E SUBSTANCE CONTAINED ☑ YES ☐ NO ☐ UNKNOWN

OFFICIALS NOTIFIED. (A-310)

HEALTH DEPT.: PERSON CCHD Dave Sweeney PHONE 757-8600 DATE 3-7-86
LOCAL MUNIC.: PERSON PHONE DATE

INCIDENT REFERRED TO: ☐ BFO ☐ BERC ☐ DCJ ☐ DWR ☐ F&G ☐ BAPC ☐ HD

1. PERSON Hartman 1191 I.R. PHONE DATE
2. PERSON PHONE DATE

COMMENTS:

COPIES: White - File Yellow - Trenton Dispatch Pink - DWM Enforcement

REFERENCE NO. 67

A-2

FILED
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS

JUN 24 1986
1:31 AM PM
CLERK, U.S. BANKRUPTCY COURT
BY: DEPUTY

UNITED STATES BANKRUPTCY COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

IN RE:	*	
	*	BANKRUPTCY NO. B-86-00166
FLOWEN OILS DELAWARE VALLEY, INC. d/b/a FLOWEN ENERGY CORP.	*	
	*	CHAPTER 11
DEBTOR	*	

VOLUNTARY PETITION UNDER CHAPTER 11

I.

Petitioner's address is 3302 Womack Road, P. O. Box 2440, Orange, Texas 77630. Petitioner's Federal Identification Number is 22-234-46-10 and 74-212-1015.

II.

Petitioner has had its principal place of business (headquarters), its officers, directors and principal management within this district for the preceding one hundred eighty (180) days immediately preceding the filing of this Petition.

III.

No other cases under the Bankruptcy Code initiated on a Petition by or against Petitioner is now pending.

IV.

Petitioner is qualified to file this Petition and is qualified to be a debtor under Chapter 11 or Title 11 of the Bankruptcy Code as a voluntary debtor.

V.

Petitioner intends to file a plan pursuant to Chapter 11 of the Act.

VI.

Exhibit "A" is attached hereto and made a part of this Petition and is a list of Petitioner's larger creditors and their addresses.

WHEREFORE, Petitioner prays for relief under Chapter 11 of Title 11 of the Bankruptcy Code.

Respectfully submitted,

MOORE, LANDREY, GARTH & JONES

By Floyd A. Landrey

Floyd A. Landrey
State Bar No. 11866000
285 Liberty, Suite 1900
Beaumont, Texas 77701
(409) 835-3891

ATTORNEYS FOR DEBTOR

REFERENCE NO. 68

Form DWM-002 B
2/84

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
120 ROUTE 156, YARDVILLE, N.J. 08620

NOTICE OF VIOLATION

FILE # 04083

ID NO. NJD980536577 DATE 8/29/86

NAME OF FACILITY FLOWEN OIL DELAWARE VALLEY, INC.

LOCATION OF FACILITY 1800 CARMAN ST., CAMDEN, N.J. 08105

NAME OF OPERATOR ARCHIE ROSS - FACILITY OPERATOR

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

DESCRIPTION OF VIOLATION NJAC 7:26-12.1 (a) - COMPANY OPERATING A HAZARDOUS WASTE FACILITY WITHOUT A PERMIT AND WITHOUT STATUS. SPECIFICALLY, THE COMPANY ACCEPTED WASTE OIL FOR TREATMENT ON 8/27/86 (MANIFEST NJA0231131) AND OPERATED THE MECHANICAL EQUIPMENT DESIGNED FOR THE TREATMENT OF WASTE OIL, EFFECTIVELY RESULTING IN THE PRODUCTION OF PRODUCT OIL FOR SALE. NJAC 7:26-9.8(b) FAILURE TO BEGIN CLOSURE OF THE FACILITY UPON EXPIRATION OF PERMIT. PERMIT EXPIRED 6/10/86

Remedial action to correct these violations must be initiated immediately and be completed by 8/28/86 CO. OFFICIAL ADVISED TO CEASE ALL OPERATION THIS DATE. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Terry Ostrander
Investigator, Division of Waste Management
Department of Environmental Protection

REFERENCE NO. 69

Form DWM-129
84

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

INSPECTION REPORT

REPORT PREPARED FOR:

- ☒ Generator
- ☒ Transporter
- ☒ HWM (TSD) Facility

FACILITY INFORMATION

Name: FLOWEN OIL DELAWARE VALLEY CORP.

Address: 1800 CARMAN STREET
CAMDEN, N.J. 08105

Lot: 1 Block: 1431

County: CAMDEN

Phone: (609) 365-5544

EPA ID#: NJD980536577

Date of Inspection: DECEMBER 2, 1986

PARTICIPATING PERSONNEL

State or EPA Personnel: J. ALLEN - NJDEP

Facility Personnel: A. ROSS - FACILITY MGR.

Report Prepared by Name: J. ALLEN

Region: SOUTH

Telephone#: (609) 859-2958

Reviewed by: Terry Ostrandy

Date of Review: 12/10/86

FACILITY NAME: FLOWEN OIL DELAWARE VALLEY CORP.

ADDRESS: 1800 CARMAN ST.

CAMDEN, N.J. 08105

TIME IN: 0915 HOURS

COUNTY: CAMDEN

TIME OUT: 1315 HOURS

EPA ID : NJD980536577

DATE OF INSPECTION: DEC. 2, 1986

PHOTOS TAKEN ☐ YES ☑ NO

If yes, how many? _____

SAMPLE TAKEN ☐ YES ☑ NO NO. OF SAMPLES NA.

NJDEP ID # _____

MANIFESTS REVIEWED ☑ YES ☐ NO

Number of manifests in compliance All

Number of manifests not in compliance NONE

List manifest document numbers of those manifests not in compliance.

REVIEWED MANIFESTS - 300 (1985)

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

FLOWEN OIL DELAWARE VALLEY CORPORATION IS A WASTE OIL TREATMENT AND RECYCLING FACILITY LOCATED IN CAMDEN CITY, CAMDEN CO, N.J. THE FACILITY CONSISTS OF: A WASTE STORAGE AREA CONSISTING OF SIXTEEN (16) 15,000 GALLON VERTICAL ABOVE GROUND STORAGE TANKS, A PROCESS BUILDING, PRODUCT STORAGE AREA CONTAINING FOUR (4) 25,000 GALLON VERTICAL ABOVE GROUND STORAGE TANKS, A LABORATORY BUILDING, A BOILER HOUSE BUILDING, AND FIVE (5) UNDERGROUND OIL/WATER INTERCEPTOR TANKS.

THE OPERATIONAL PORTION OF THE TREATMENT FACILITY IS FULLY CONCRETED AND ALL WATER LEAVING THE FACILITY GOES TO THE CAMDEN CITY M.U.A.

FLOWEN VOLUNTARILY CEASED OPERATION EARLY IN 1986 (JANUARY) DUE TO UNSTABLE OIL PRICES. DURING THIS TIME THE OPERATION AUTHORIZATION UNDER WHICH THEY OPERATED EXPIRED, ON 6/10/86. THE FACILITY REMAINED INOPERABLE UNTIL 11/18/86 WHEN AN A.C.O. WAS SIGNED BETWEEN FLOWEN AND N.J.D.E.P. AT THE TIME OF THIS INSPECTION, OPERATION HAD RESUMED ON A LIMITED BASIS.

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

TREATMENT AND RECYCLING OF USED OILS RESULTING IN THE GENERATION OF WASTE OIL FILTER SLUDGES.

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

151,200 GALLONS WASTE OIL:

FOLLOWING WASTE CODES COMBINED IN STORAGE TANKS.

X-721, X-722, X-724, X-725, X-726, X-727, X-728

NO DRUMS ON SITE AT TIME OF INSPECTION.

REFERENCE NO. 70

0408B
CONFIDE

Form VSC-005
4/85

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

INCIDENT NOTIFICATION REPORT

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

DATE 12-15-86 TIME (Military) 1350 REC'D BY Scot PHONE NO. 859-2958

INCIDENT REPORTED BY: CASE NO. 86.12.15.02S

NAME Andrew CACCIA PHONE 582-2193-Home

STREET

CITY STATE

AFFILIATION Former Flowen Employee - admittedly has grudge (FIRED) against Flowen Oil

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

INCIDENT LOCATION:
NAME (Site) Flowen Oil ☐ UNK PHONE

STREET

CITY Camden COUNTY Camden STATE ZIP CODE

STATUS AT SCENE OF INCIDENT: Accepting loads of waste oil w/o giving tests for PCB + chlorides, only water tests + flash tests. Accept waste that fails flash test. (70°F) DATE OF INCIDENT: TIME:

ANYONE HOSPITALIZED	☐ YES ☒ NO	POLICE AT SCENE	☐ YES ☒ NO
AREA EVACUATED	☐ YES ☒ NO	FIREMAN AT SCENE	☐ YES ☒ NO
CONTAMINATION OF	☐ AIR ☐ LAND ☐ WATER	ASSISTANCE REQUIRED	☐ YES ☒ NO
PUBLIC EXPOSURE	☐ YES ☐ NO		
RECEIVING WATER		POTABLE WATER SOURCE	☐ YES ☐ NO
WIND DIRECTION	LOCATION TYPE ☐ CITY ☐ INDUSTRIAL ☐ RURAL		

SOURCE OF INCIDENT/PROBLEM: ☒ KNOWN ☐ UNKNOWN

COMPANY NAME Flowen Oil PHONE

CONTACT TITLE

STREET

CITY COUNTY STATE ZIP CODE

IDENTITY OF SPILLED AND/OR DISCHARGED SUBSTANCE: ☐ KNOWN ☐ UNKNOWN

NAME OF SUBSTANCE

AMT. A/P/E SUBSTANCE CONTAINED ☐ YES ☐ NO ☐ UNKNOWN

NFA TO 12/17/87

OFFICIALS NOTIFIED. (A-310)

HEALTH DEPT.: PERSON PHONE DATE

LOCAL MUNIC.: PERSON PHONE DATE

INCIDENT REFERRED TO: ☐ BFO ☐ BERC ☐ DCJ ☐ DWR ☐ F&G ☐ BAPC ☐ HD

1. PERSON Allen - Roving PHONE DATE

2. PERSON PHONE DATE

COMMENTS:
→ interceptor in middle of parking lot full of sludge → Flowen Avoiding telling Jack. (refused)
→ Chemist at facility will not sign manifest. Archie Ross has signed manifests.
→ L+L waste oil Co brings in many of these loads.
→ spill on Fri evening 12/12, overflow in tank farm.
→ Fri, 12/11, accepted 10000 gal of apple juice, Tank overflowed
→ no waste information forms used.
→ accepting X-725 non-flowable sludge soils → and manifesting offsite themselves. (DANA signed, mike)

COPIES: White - File Yellow - Trenton Dispatch Pink - DWM Enforcement

REFERENCE NO. 71

HH-019-87 A-D

Let's protect our earth

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Acting Director
401 East State St.
CN 028
Trenton, N.J. 08625
609 - 633 - 1408

IN THE MATTER OF A FLOWEN OIL DELAWARE VALLEY, INC., B NATIONAL CORPORATE DISPOSAL, INC., C DANIEL TARRATS a/k/a Michael Danna D and ALBERT TARRATS a/k/a Alan or Allan Carr	:	ADMINISTRATIVE ORDER, NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT AND NOTICE OF INTENT TO REVOKE/DENY HAZARDOUS WASTE LICENSES

This Administrative Order, Notice of Civil Administrative Penalty Assessment and Notice of Intent to Revoke/Deny Hazardous Waste Licenses is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (hereinafter "NJDEP" or the "Department") by N.J.S.A. 13:1D-1 et seq. and the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq., and duly delegated to the Assistant Director for Enforcement of the Division of Hazardous Waste Management pursuant to N.J.S.A. 13:1B-4.

FINDINGS

1. Flowen Oil Delaware Valley, Inc. (hereinafter "Flowen Oil") operates a hazardous waste facility, EPA ID #NJD980536577, as defined by N.J.A.C. 7:26-1.4, located at 1800 Carmen Street, City of Camden, County of Camden, State of New Jersey.

2. Flowen Oil operates its facility pursuant to a certificate of Approved Registration and Engineering Design Approval, issued by NJDEP on June 10, 1981, under Facility Registration No. 6408A, later amended to No. 0408B, and an Administrative Consent Order entered into on November 18, 1986. These authorizations are equivalent to a "license" as defined at N.J.S.A. 13:1E-127.g. Flowen Oil also holds a hazardous waste transporter license, No. S-8156, issued by NJDEP.

3. National Corporate Disposal, Inc. (hereinafter "NCD") is a business entity with offices located at 560 Hudson Street, City of Hackensack, County of Bergen, State of New Jersey.

4. The owner and principal officer of NCD is Daniel Tarrats, also known as Michael Danna.

5. Albert Tarrats, also known as "Alan Carr" or "Allan Carr", is or has been an employee of NCD and has functioned as a manager of the company.

6. National Corporate Disposal, Inc., holds itself out to the public as engaged in the business of "brokering" the disposal of hazardous waste, that is, making arrangements between generators of hazardous waste and licensed hazardous waste transporters and TSD (treatment, storage or disposal) facilities for the disposal of hazardous waste.

7. Neither NCD nor any of its employees themselves hold any permit or license issued by NJDEP.

PRIOR PERFORMANCE RECORD OF DANIEL AND ALBERT TARRATS

8. Between in or about August, 1979, and in or about the middle of 1982, Daniel Tarrats a/k/a Michael Danna, and Albert Tarrats a/k/a Allen Carr or Alan Carr, owned and operated a company known as the Barone Barrel and Drum Company or the Barone Hazardous Waste Management Corporation ("Barone"), with offices in the City of Paterson, N.J.

9. On or about October 7, 1981, in connection with an investigation conducted by the New Jersey Division of Criminal Justice, NJDEP, and the Passaic County Prosecutor's Office, search warrants were executed at warehouses controlled by Barone in Paterson and Newark.

10. Approximately 3,500 drums of flammable and hazardous waste were found to be stored in the Paterson facility, and 80 in Newark. Neither location had been lawfully registered with NJDEP as a hazardous waste storage facility.

11. As a result of the investigation, on October 3, 1983, a 34-count indictment, No. SGJ 105-83-5, was returned by the State Grand Jury, charging the Barone Hazardous Waste Management Corporation, Daniel Tarrats and Albert Tarrats, with the following crimes:

Count 1	-	2C:5-2 (Conspiracy)
Counts 2 thru 4	-	2C:17-2 (Unlawful Release & Abandonment of Harmful Substance)
Counts 5 thru 7	-	13:1E-9.e.(2) (Illegal Disposal of Hazardous Waste)
Counts 8 & 9	-	13:1E-9.e.(2) (Illegal Treatment and Storage of Hazardous Waste)
Count 10	-	2C:17-2 (Risking Widespread Injury & Damage)
Counts 11 thru 24	-	2C:20-4 (Theft by Deception)
Counts 25 thru 34	-	13:1E-9.e.(1) (Illegal Transportation of Hazardous Waste)

12. On July 23, 1984, Albert Tarrats and Barone Hazardous Waste Management Corp. pled guilty to Count Eight of Indictment SGJ 105-83-5, which charged the defendants with illegal storage of hazardous waste. On March 20, 1985, the defendants were sentenced before the Honorable William J. Marchese, J.S.C., in Passaic County. At the time of sentencing, a consent judgment was entered into under which Albert Tarrats agreed to an injunction restraining him from further involvement in the hazardous waste industry. The injunction read as follows:

> "The defendant, Albert Tarrats, is enjoined and restrained for a period of 10 years from holding any license in a hazardous waste business or from holding a position with any hazardous waste business as an officer, director, partner or key employee thereof, or from holding any interest whatsoever of that business concern unless the business is a publicly traded corporation, in which case he may hold not more than 5% of the equity or the debt liability of the business."

13. Following the discovery of the illegally stored hazardous waste in Paterson and Newark, NJDEP issued an Administrative Order to Barone requiring it to remove the waste to a lawful disposal facility, and to clean up the sites. NJDEP also filed suit in the Superior Court, Chancery Division, to compel compliance with the Administrative Order.

14. Barone on October 26, 1981, entered into an Interlocutory Consent Order to clean up the Paterson site, then failed to comply with the Order.

15. On January 5, 1982, NJDEP obtained an order from the Court authorizing it to clean up the Paterson site pursuant to the Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq.

16. As a result of Barone's illegal activities in creating the unauthorized storage sites, and the company's failure to clean them up, the Department revoked Barone's license to haul solid or hazardous waste, effective April 1, 1982. The grounds on which this action was based are set forth in a document entitled, "REVOCATION OF REGISTRATION TO COLLECT AND HAUL SOLID/HAZARDOUS WASTE," dated February 17, 1982.

17. Neither Barone nor either of the Tarrats' requested a hearing on the revocation notice, which therefore became a final action of the Department. The document is attached hereto and incorporated by reference.

18. Also as a result of Barone's activities, the Department was compelled to expend in excess of $274,000 from the New Jersey Spill Compensation Fund ("the Fund") to clean up the warehouses and dispose of the wastes stored there.

19. Subsequently the Fund obtained a judgment in the amount of $274,000 against Barone and Daniel Tarrats. This judgment has never been paid.

20. On February 3, 1982, the Department of Environmental Resources (DER) of the Commonwealth of Pennsylvania revoked Barone's authorization to transport hazardous waste in Pennsylvania because of a failure to provide required bonds and a contingency plan. A copy of the DER's action is attached. This was not appealed.

21. Based on the foregoing, the Department finds that Daniel Tarrats and Albert Tarrats, jointly and individually, in their prior performance records in the collection, transportation, storage or disposal of hazardous waste between 1979 and 1982, exhibited a serious lack of reliability, expertise and competence, warranting their disqualification from future licensing pursuant to N.J.S.A. 13:1E-133.a.

22. The Department further finds that the conviction of Albert Tarrats constitutes a disqualification under N.J.S.A. 13:1E-133.b.(19), since he was convicted under a criminal provision of the Solid Waste Management Act, a state environmental protection law. His conviction disqualifies any company that would have to list him in its disclosure statement, or in which he holds a beneficial interest, from holding a hazardous waste license.

THE TARRATS' ACQUISITION OF INTERESTS IN FLOWEN OIL,
AND FAILURE TO DISCLOSE THEIR INTEREST

23. Sometime between 1981 and 1984, Albert Tarrats began to use or resumed the use of the name, "Allan Carr", and Daniel Tarrats began to use or resumed the use of the name, "Michael Danna". For the sake of brevity, some references in this document to Daniel Tarrats a/k/a Michael Danna and to Albert Tarrats a/k/a Allan Carr may appear in the form "Michael Danna" or "Allan Carr" where appropriate to describe an event or period in which those individuals were using the names of "Danna" or "Carr".

24. On or about April 5, 1984, Daniel Tarrats a/k/a Michael Danna caused the organization and incorporation of National Corporate Disposal, Inc.

25. Since its inception, National Corporate Disposal (hereinafter: NCD) has held itself out as a "broker" dealing with the transportation and disposal of hazardous waste. NCD has entered into contracts for the transportation and disposal of hazardous waste, but so far as is known to NJDEP at this time, has subcontracted actual handling of hazardous waste to companies licensed by NJDEP.

26. On or about July 30, 1986, National Corporate Disposal, Inc. and "Michael Danna" entered into an "Agreement for Sale of Common Stock and Escrow Agreement" ("the Agreement") with Flowen Energy Corporation, the 100% owner of the stock of Flowen Oil Delaware Valley. Under this Agreement, Flowen Energy Corporation agreed to sell NCD and "Danna" 30% of Flowen Oil for approximately $940,000, payable over three years. The Agreement also gave the buyers an option to purchase the other 70% of Flowen Oil stock for between $2.8 million and $3 million, depending upon when the option was exercised. The buyers were given the right to vote the stock, which was to be delivered to an escrow agent to hold pending final payment of the purchase price. The buyers obligated themselves to provide insurance for Flowen Oil and also agreed to:

> "3. Assume sole and complete responsibility to obtain and/or renew any and all permits, licenses or other such authorizations which may be required to operate the [Flowen Oil] facility...

4. To provide [Flowen Oil] by personal loan or otherwise with a sufficient amount of working capital to pay all its bills and maintain a viable on-going operation..."

27. Following execution of the Agreement, NCD did pay virtually all bills subsequently incurred by Flowen Oil, including the salaries of Flowen Oil's employees and the fees of Flowen Oil's attorneys in connection with negotiation of the Administrative Consent Order of November 18, 1986.

28. Following execution of the Agreement, NCD did make payments to Flowen Energy Corporation in accordance with the payment schedule set forth in Section Three of the Agreement.

29. Under an addendum to the Agreement, likewise executed on July 30, 1986, Flowen Energy Corporation agreed to make Michael Danna vice-president of Flowen Oil and to let the buyers, that is, NCD and "Danna", operate the business without interference from the majority shareholders.

30. In effect, the Agreement and addendum turned control of Flowen Oil over to National Corporate Disposal and Daniel Tarrats a/k/a Michael Danna.

31. In or about the month of August, 1986, Albert Tarrats a/k/a Allan Carr joined the staff of National Corporate Disposal. Thereafter, Albert Tarrats exercised managerial prerogatives at NCD, including hiring and firing of employees.

32. On numerous occasions after execution of the Agreement on July 30, 1986, Daniel Tarrats a/k/a Michael Danna, Albert Tarrats a/k/a Allan Carr, and National Corporate Disposal exercised the prerogatives of management over Flowen Oil, including but not limited to the following: hiring and firing of Flowen Oil employees; decisions about equipment and financing, about wastes to be handled by Flowen and/or in Flowen's name, and as to what information should be communicated to NJDEP in the course of negotiations for the facility's permits.

33. Also on numerous occasions, "Danna", "Carr", and other employees of NCD represented to clients, customers and the general public that NCD did in fact own, operate, control or have an interest in a waste oil treatment facility named Flowen Oil.

34. Based on the above, the Department finds: (a) that on or after July 30, 1986, Flowen Oil underwent a change of ownership or operational control; (b) that Daniel Tarrats a/k/a Michael Danna became an officer and/or functioned in a manner that made him a "key employee" (as defined at N.J.S.A. 13:1E-127.f.) of Flowen Oil; (c) that Albert Tarrats a/k/a Allan Carr functioned in a manner that made him a "key employee" of Flowen Oil; (d) that National Corporate Disposal and Daniel Tarrats a/k/a Michael Danna acquired an equity interest in Flowen Oil; and (e) that Daniel Tarrats and Albert Tarrats acquired a "beneficial interest" in the business of Flowen Oil. The "beneficial interest" included, among other things, the voting rights, contract rights and practical control of Flowen Oil that flowed from the Agreement described in paragraph 26, together with the profit-making opportunities that control gave them directly and in connection with the operation of NCD.

35. The acquisition of the beneficial interest described above, in the case of Albert Tarrats a/k/a Allan Carr, violated the injunction described in paragraph 12 above.

36. Pursuant to N.J.A.C. 7:26-12.5(b), a permitted TSDF must notify the Department at least 180 days prior to any proposed change of ownership or operational control. Flowen Oil has not notified the Department of any change of ownership or operation control, nor has NCD.

37. Pursuant to N.J.S.A. 13:1E-128 and N.J.A.C. 7:26-16.6, applicants for and holders of licenses to operate hazardous waste facilities must submit to the Department a disclosure statement, listing among other things the names and positions of all stockholders, company officers and key employees. This disclosure information must be updated within 30 days of any material change.

38. On November 2, 1984, Flowen Oil submitted a disclosure statement to NJDEP in which there is no mention of involvement in the company's ownership or management by National Corporate Disposal, Daniel Tarrats, Albert Tarrats, "Michael Danna" or "Allan Carr". To date, no amended disclosure information has been submitted by Flowen Oil, with the exception of a letter noting the name change of plant manager Archibald Bilsland, to Archie Ross.

39. Between July 30, 1986 and November 18, 1986, Flowen Oil was negotiating with the Department for the Administrative Consent Order (ACO) entered on November 18, 1986. A copy of this document is attached.

40. During the period of negotiations for the ACO, Flowen Oil and NCD both failed to disclose that substantial control of Flowen Oil had been given to NCD and Daniel Tarrats a/k/a Michael Danna. This was concealment of a material fact, for had the Department been aware of "Danna's" role in Flowen, and that "Danna" was Tarrats, the Department would have denied Flowen's hazardous waste license application based on Tarrats' previous record in the operation of Barone.

41. This concealment amounted to "fraud, deceit or misrepresentation" in securing a license, or the equivalent to a license.

42. In granting operational control and managerial authority to NCD and "Michael Danna", Flowen Oil made NCD and Daniel Tarrats its actual or de facto employees or its agents. Flowen Oil is therefore liable for actions taken by NCD and Daniel Tarrats within the scope of that authority. With respect to the regulations of the Department, the real or apparent authority of a vice-president of a corporation that holds a hazardous waste facility permit generally includes the authority to sign or to cause the preparation and filing of hazardous waste manifests on the facility's behalf.

THE KENTILE FLOORS CLEANUP JOB

43. In October, 1986, Kentile Floors of South Plainfield contracted S & D Engineering Services, Inc. (hereinafter "S & D") to remove contaminated soil resulting from the dumping of an unknown petroleum product on its property. S & D hired National Corporate Disposal as a "broker" for the job. NCD in

turn hired two registered transporters, Merola Enterprises, Inc. and National Waste Disposal, Inc. to remove the material.

44. While Kentile Floors was told by S & D that the material was being taken to Flowen Oil in Camden, N.J. for treatment or disposal, NCD in fact arranged to have it taken to Wayne Disposal, Inc., a landfill in Michigan, using Flowen Oil's waste approval code, #2679, to allow immediate acceptance of the hazardous waste.

45. Ten truckloads of petroleum-contaminated soil were transported from Kentile Floors to Wayne Disposal by Merola Enterprises, Inc. Five truckloads left Kentile on Friday, October 17, 1986, and five more left on Monday, October 20.

46. NCD prepared ten New Jersey hazardous waste manifests and ten Michigan hazardous waste manifests corresponding to these truckloads. The New Jersey manifests were numbered NJA0123511 thru -516, and NJA0213518, -521, -523, and -525. The Michigan manifests were numbered MI0673874, -878 thru -881 and MI0861030 thru -033.

47. NCD employees prepared the New Jersey manifests with typed information indicating the transportation from Kentile Floors to Flowen Oil's facility in Camden of "Hazardous Oil Sludge N.O.S." They prepared the Michigan manifests with typed information indicating the transportation from Flowen Oil in Camden to Wayne Disposal of "Non-hazardous Oil Sludge N.O.S."

48. The preparation of the manifests described above was done at the direction of Daniel Tarrats a/k/a Michael Danna.

49. NCD employees, at Daniel Tarrats' direction (and/or Daniel Tarrats himself), caused the forged signature of Linda Lambert, a secretary at Flowen Oil, to be placed upon the Michigan manifests described above (in the box for the generator's certification) and on five of the New Jersey manifests (in the box for the facility operator).

50. At Tarrats' ("Danna's") direction, Scott White, a Merola Enterprises employee, signed the other five New Jersey manifests in the box for the facility operator.

51. Again, at Tarrats' ("Danna's") direction, an NCD employee on October 17, 1987, and Scott White on October 20, presented both sets of manifests to Merola Enterprises' drivers at or near the Kentile job site, and secured the drivers' signature thereon.

52. Copies of the New Jersey manifests were left with Kentile Floors, while copies of the Michigan manifests were sent on to Wayne Disposal with the drivers.

53. The copies of the manifests intended for filing with the respective State government agencies were returned to the offices of NCD.

54. NCD arranged for the New Jersey manifests to be filed with the Department, and for copies indicating receipt at Flowen Oil to be mailed back to Kentile Floors.

55. The contaminated soil was manifested in the manner described above because NCD could not have gotten Wayne Disposal to accept it directly without first submitting time-consuming and costly chemical analyses. By passing it off as a recognized waste stream from Flowen Oil, NCD was able to get it into Wayne Disposal immediately.

56. The contaminated soil was falsely described as "hazardous oil sludge" on the New Jersey manifests; under the terms of its Engineering Design Approval from the Department, dated April 19, 1983, Flowen Oil could accept pumpable sludge but not solids.

57. An 11th shipment of contaminated soil from Kentile Floors was transported to Wayne Disposal by National Waste Disposal, Inc. on or about November 3, 1986. National Waste was hired by "Mike Danna" of NCD.

58. A similar scheme of false manifests was employed. A New Jersey manifest, NJA0181510, was started by a National Waste employee but completed by another at "Danna's" direction, listing Flowen Oil as the destination. A corresponding Michigan manifest, MI0879902, was filled out by the National Waste employee, following "Danna's" instructions, indicating Flowen Oil as the generator and Wayne Disposal as the destination.

59. At "Danna's" instruction, the National Waste Employee signed the manifests for Flowen Oil, using "Mike Danna's" name.

60. In reality, the waste material traveled from Kentile Floors to National Waste's yard in Trenton, and then on to Wayne Disposal. National Waste did not transport the materials described on the manifest to or from Flowen Oil.

61. The net effect of the manifest falsifications described above was to leave Kentile Floors and NJDEP with the false impression that Kentile's waste had gone to the Flowen Oil facility, and to give Wayne Disposal, NJDEP and the Michigan Department of Natural Resources the impression that the waste Wayne Disposal received had come <u>from</u> Flowen Oil and was oil sludge rather than contaminated soil.

62. Over and above the regulatory violations, these deceptions constituted "fraud, deceit or misrepresentation" in the conduct of Flowen's licensed activity by its agent, "Danna".

THE ANDY'S BODY SHOP CLEANUP JOB

63. In November, 1986, NCD, through a contractor named Larry Tyree, was hired to arrange for the transportation and disposal of petroleum product contamination soil from Andy's Body Shop in Oceanside, N.Y.

64. NCD again contracted with Merola Enterprises, Inc., for the transportation and arranged for the material to go to Wayne Disposal, Inc.

65. As with the Kentile Floors job, two sets of manifests were used to give the appearance that "sludge" from Andy's was transported to Flowen Oil and "solids" from Flowen were transported to Wayne.

66. This was done at "Danna's" direction.

67. The New Jersey manifests were numbered NJA0213531, -532, -533, and -538 thru -541. The Michigan manifests were numbered MI0681054 thru -057, -063, -064 and -065.

68. "Michael Danna", and/or persons acting at his direction, signed the name of Michael Danna on both sets of manifests for Flowen Oil; as recipient on the New Jersey manifests and as generator on the Michigan manifests.

69. The net effect of the manifest falsifications described above was to leave Andy's Body Shop and NJDEP with the false impression that Andy's waste had gone to Flowen Oil, and to give Wayne Disposal, NJDEP and the Michigan DNR the impression that the waste Wayne Disposal received had come from Flowen, and was oil sludge rather than contaminated soil.

70. These deceptions constituted "fraud, deceit, or misrepresentation" in the conduct of Flowen's licensed activity by its agent, "Danna".

INDICTMENT OF DANIEL TARRATS
AND NATIONAL CORPORATE DISPOSAL, INC.

71. As a result of an investigation by the Division of Criminal Justice into matters which included the Kentile Floors and Andy's Body Shop cleanup jobs described above, on September 8, 1987, a 25-count indictment, NO. SGJ 190-87-1, was returned by the State Grand Jury, charging Daniel Tarrats and National Corporate Disposal, Inc., with the following crimes:

Count 1	2C:5-2 (Conspiracy)
Counts 2, 4, 6, 7, 10	13:1E-9.g.(5) (Making False Statements on Manifest)
Counts 3, 5, 8, 9, 11	13:1E-9.g.(4) (Making False Statement to Person Who Prepares a Manifest)
Counts 12,13	2C:20-4 (Theft by Deception)
Counts 14,15, 16, 17	2C:28-7.a.(1) and (2) (Tampering With Public Records or Information)
Counts 18,19,	2C:21-4 (Falsifying or Tampering With Records)
Counts 21,22, 23, 26	2C:21-1(a) (Forgery)
Counts 24,25	2C:21-9.c. (Misconduct by Corporate Official)

Among the crimes charged are several enumerated at N.J.S.A. 13:1E-133.b.

SUMMARY OF STATUTORY AND REGULATORY VIOLATIONS

72. Based on the foregoing, the Department finds that the following violations of the Solid Waste Mangement Act and/or regulations promulgated under the Act have been committed by Flowen Oil, National Corporate Disposal, Inc.,

Daniel Tarrats a/k/a Michael Danna and/or Albert Tarrats a/k/a Allan Carr (references to specific findings in brackets [thus]):

73. NCD, Daniel Tarrats and/or Albert Tarrats acquired ownership or control of Flowen Oil without notifying the Department at least 180 days prior to the change of ownership or control; and

74. Flowen Oil failed to notify the Department at least 180 days prior to a proposed change of ownership or operation control, in violation of N.J.A.C. 7:26-12.5(b) and -12.3(c)4. [See paragraphs 23-36].

75. Flowen Oil, NCD, Daniel Tarrats and/or Albert Tarrats failed to provide notice to the Department within 30 days of a change in the information required to be included in the disclosure statement of Flowen Oil, in violation of N.J.S.A. 13:1E-128.e. and N.J.A.C. 7:26-16.6. [See paragraphs 23-37.]

76. Flowen Oil, NCD, and Daniel Tarrats a/k/a Michael Danna, permitted Albert Tarrats, a person convicted of a crime listed at N.J.S.A. 13:1E-133.b. and N.J.A.C. 7:26-16.8(b), to acquire an interest in the business of Flowen Oil without first obtaining the approval of the Department, in violation of N.J.A.C. 7:26-16.21 and a court order. [See paragraphs 7-12 and 23-36.]

77. The Department finds that the following violations of the Solid Waste Management Act and/or regulations promulgated under the Act have been committed by Flowen Oil, National Corporate Disposal, Inc. and/or Daniel Tarrats a/k/a Michael Danna:

78. False or misleading statements were made on the following hazardous waste manifest documents:

NJA0213511, NJA0213512, NJA0213513, NJA0213514, NJA0213515, NJA0213516, NJA0213518, NJA0213521, NJA0213523, NJA0213525, NJA0213531, NJA0213532, NJA0213533, NJA0213538, NJA0213539, NJA0213540, NJA0181510;

and

MI0581050, MI0673874, MI0673878, MI0673879, MI0673880, MI0673881, MI0681054, MI0681055, MI0681056, MI0681057, MI0681060, MI0681061, MI0681062, MI0681063, MI0681064, MI0681065, MI0861030, MI0861031, MI0861032, MI0861033, and MI0879902.

The false or misleading statements included misrepresentations as to the descriptions of the waste transported; the origin and destination points of the waste; and false signatures.

With respect to those documents, Flowen Oil, NCD and/or Daniel Tarrats a/k/a Michael Danna, knowingly or recklessly made false or misleading statements to persons who prepared hazardous waste manifests required to submitted to the Department, and/or made false or misleading statements upon the manifest documents themselves, in violation of N.J.S.A. 13:1E-9.g.(4) or (5) and/or N.J.S.A. 13:1E-9.h.(4) or (5). See also N.J.A.C. 7:26-7.3(c) and (d).

With respect to the shipments of hazardous waste corresponding to the manifests, Flowen Oil, NCD and/or Daniel Tarrats caused or permitted hazardous waste to be transported without the completion and submission of manifests accurately describing the waste and its actual origins and destinations as required by N.J.A.C. 7:26-7.3(a), 7:26-7.4(a), 7:26-7.5(d) and 7:26-7.6(a), in violation of N.J.S.A. 13:1E-9.i.

79. The Department further finds that, with respect to the activities described in paragraphs 43 through 70 above, National Corporate Disposal, Inc. and Daniel Tarrats exercised such a complete degree of control over the schemes to dispose of hazardous waste without proper manifests (including the preparation of the manifests and giving orders to the employees of Merola Enterprises, Inc., and National Waste Disposal, Inc.) as to have exceeded the limits of "brokering," and they did in fact "engage" in the collection or disposal of solid (hazardous) waste. Since NCD has no approved registration from NJDEP, this engaging was without authorization from the Department, in violation of N.J.S.A. 13:1E-5.a. and N.J.S.A. 13:1E-9.g.(3) or -9.h.(3), and N.J.A.C. 7:26-3.2(c).

ORDER

PURSUANT TO N.J.S.A. 13:1E-9.c., IT IS HEREBY ORDERED THAT:

80. Flowen Oil, upon receipt of this Administrative Order, shall cease operation as a hazardous waste facility and shall operate as a generator of hazardous waste only to the extent necessary to implement its closure plan or to accomplish removal of solid waste or hazardous waste from its facility as required by the Department.

81. Flowen Oil shall commence implementation of its closure plan immediately.

82. This order is being given pursuant to Paragraph 13 of the Administrative Consent Order of November 18, 1986, under which it was agreed that "Flowen Oil's continued operation is expressly conditioned upon Flowen Oil's compliance with... all applicable rules, regulations and statutes governing operation of the facility," and that if Flowen failed to comply with any of the terms of the ACO, its authority to operate would be "automatically null and void, and Flowen Oil agrees to cease operations upon notice of the same from NJDEP." This Order constitutes said notice. Flowen further waived its right to request an administrative hearing regarding cessation of operation pursuant to Paragraph 13.

83. Upon receipt of this Administrative Order, National Corporate Disposal Inc., shall be removed from the Department's list of Discharge Cleanup Organizations that have filed information with the Department pursuant to N.J.A.C. 7:1E-3.1 et seq.

84. National Corporate Disposal, Inc., Daniel Tarrats and Albert Tarrats and any corporation, partnership or other business entity owned or controlled by any of them, shall immediately divest themselves of, and shall not in the future acquire any interest, direct or indirect, in the business of Flowen Oil Delaware Valley, Inc., or any other entity licensed by NJDEP pursuant to N.J.S.A. 13:1E-5. This includes, but is not limited to, any equity holding, options, stock shares, percentages, voting rights, contract rights or debt

liability of Flowen Oil or other licensed entity. Neither NCD, Daniel Tarrats, Albert Tarrats nor any of their employees shall exercise any managerial or supervisory power or control over Flowen Oil or any other licensed entity or the employees thereof, nor shall Daniel Tarrats or Albert Tarrats hold any position with such a licensed entity as an officer, director, partner or key employee thereof.

85. NCD, Daniel Tarrats and Albert Tarrats shall not hold themselves out to any client or customer or to the general public as owning, controlling or having any interest whatsoever in Flowen Oil or any other entity licensed by NJDEP pursuant to N.J.S.A. 13:1E-5. Within 10 days of receipt of this Administrative Order, NCD, Daniel Tarrats and Albert Tarrats shall affirmatively advise in writing any person to whom they have previously represented that they own, control or are affiliated with Flowen Oil, that they do <u>not</u> own, control or are affiliated with Flowen Oil. Within 20 days of receipt of this Order, NCD, Daniel Tarrats and Albert Tarrats shall provide to the Department a list of the persons who have been so advised, together with proof of mailing. This documentation is to be supplied to John Barry at the address indicated in paragraph 88 below.

86. NCD, Daniel Tarrats and Albert Tarrats, shall not engage in the following activities which constitute engaging in the collection or disposal of solid/hazardous waste:

    (a) Direct supervision or communication of instructions to drivers, loaders or other persons engaged in the physical transportation of disposal of solid waste.

    (b) Signing of hazardous waste manifest documents.

    (c) Preparation of manifests or providing information to be used in the preparation of hazardous waste manifests, except as that information may be provided <u>to</u> NCD <u>by</u> generators and licensed transporters of TSD facility operator. NCD may not originate such information in the sense that this involves NCD in the choice of destinations for waste.

    (d) Exercise of any discretionary powers as to where solid waste is to be transported or disposed of.

87. Daniel Tarrats, Albert Tarrats and NCD, having demonstrated that they cannot be trusted to refrain from inducing licensed entities to engage in violations of the Solid Waste Management Act and/or NJDEP regulations promulgated under the Act's authority, are ordered to cease and desist from their business of hazardous waste "brokering." Neither NCD, Daniel Tarrats nor Albert Tarrats shall enter into, or hold themselves out to the public as legally capable of entering into, any contract for the transportation or disposal of solid or hazardous waste to or from any location in the State of New Jersey. Nor shall they, or any of them, arrange, negotiate or participate in the formation of any such contract; nor accept any commission, fee or other monetary compensation for arranging any such contract or for participating in any way in arranging for the transportation or disposal of solid or hazardous waste.

88. Flowen Oil is further ordered to submit within 20 calendar days after receipt of this Order the enclosed VERIFICATION OF COMPLIANCE by certified mail, return receipt requested or by hand delivery to:

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
401 E. State Street
CN 028
Trenton, NJ 08625
Attention: John Barry

89. NCD, Daniel Tarrats and Albert Tarrats are further ordered to submit within 20 calendar days after receipt of this Order the enclosed VERIFICATION OF COMPLIANCE by certified mail, return receipt requested or by hand delivery to the address set forth in paragraph 88 above.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

90. Pursuant to N.J.S.A. 13:1E-9.e. and based upon the above FINDINGS, the Department had determined that civil administrative penalties shall be assessed against Flowen Oil and against NCD and Daniel Tarrats, jointly and severally, and against NCD, Daniel Tarrats and Albert Tarrats, jointly and severally, in the amounts set forth below:

Against Flowen Oil:

(a) for failing to notify the Department at least 180 days prior to a change of ownership or operational control [violation of N.J.A.C. 7:26-12.5(b) and -12.3(c)4]: $15,000.

(b) for failing to provide the Department with notice of a change in the information required to be included in the Disclosure Statement of Flowen Oil [violation of N.J.S.A. 13:1E-128.e., N.J.A.C. 7:26-16.6]: $15,000.

(c) for permitting Albert Tarrats to acquire a beneficial interest in the business of Flowen Oil without first obtaining the approval of the Department [violation of N.J.A.C. 7:26-16.21]: $15,000.

(d) for the false manifesting violations set forth in paragraphs 43 through 61 (Kentile Floors) [violations of N.J.S.A. 13:1E-9.g.(4), (5) and/or 13:1E-9.h.(4), (5); N.J.A.C. 7:26-7.3(c) and (d); N.J.A.C. 7:26-7.3(a), -7.4(a), -7.5(d) and -7.6(a); N.J.S.A. 13:1E-9.i]: $470,250.

(e) for the false manifesting violations set forth in paragraphs 63 through 70 (Andy's Body Shop) [same citations as in subparagraph (d) above]: $299,250.

TOTAL PENALTIES ASSESSED: $814,500.

91. Against NCD and Daniel Tarrats, jointly and severally:

(a) for the false manifesting violations set forth in paragraphs 43 through 60 (Kentile Floors) [violations of N.J.S.A. 13:1E-9.g.(4), (5) and/or 13:1E-9.h.(4), (5); N.J.A.C. 7:26-7.3(c) and (d); N.J.A.C. 7:26-7.3(a), -7.4(a), -7.5(d) and -7.6(a); N.J.S.A. 13:1E-9.i.]: $627,000.

(b) for the false manifesting violations set forth in paragraphs 63 through 70 (Andy's Body Shop) (same citations as in subparagraph (a) above]: $399,000.

(c) for engaging in the collection or disposal of hazardous waste without authorization from the Department [violation of N.J.S.A. 13:1E-5.a., -9g.(3), -9.h.(3)]: $171,000.

TOTAL PENALTIES ASSESSED: $1,197,000.

92. Against NCD, Daniel Tarrats and Albert Tarrats, jointly and severally:

(a) for acquiring ownership or control of Flowen Oil without notifying the Department at least 180 days in advance [violation of N.J.A.C. 7:26-12.5(b) and -12.3(c)4]: $63,875.

(b) for failing to provide the Department with notice of a change in the information required to be included in the Disclosure Statement of Flowen Oil [violation of N.J.S.A. 13:1E-128.e., N.J.A.C. 7:26-16.6]: $63,875.

(c) for permitting Albert Tarrats to acquire a beneficial interest in the business of Flowen Oil without first obtaining the approval of the Department [violation of N.J.A.C. 7:26-16.21]: $63,875.

TOTAL PENALTIES ASSESSED: $191,625.

93. Payment of penalties is due when a final order is issued by the Commissioner subsequent to a hearing, if any, or when this Administrative Order and Notice of Civil Administrative Penalty Assessment becomes a final order (see following paragraph). Payment shall be made by certified check payable to "Treasurer, State of New Jersey" and shall be submitted to:

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Hazardous Waste Management - Enforcement
CN 028
Trenton, NJ 08625
Attention: Ronald T. Corcory, Assistant Director

94. If no request for a hearing is received from an ordered party within twenty (20) calendar days from receipt of this Notice of Civil Administrative Penalty Assessment, it shall become a final order as to that party upon the twenty-first calendar day following its receipt, and the penalty shall be immediately due and payable.

NOTICE OF INTENT TO REVOKE/DENY HAZARDOUS WASTE LICENSES

95. Pursuant to N.J.S.A. 13:1E-5.a., no person may operate a hazardous waste facility or a hazardous waste transportation operation in New Jersey without first obtaining an approved registration from the Department. Pursuant to N.J.S.A. 13:1E-127.g. and N.J.A.C. 7:26-16.2, the term "license" means an approved registration or any authorization equivalent to an approved registration.

96. Flowen Oil has been operating its facility pursuant to a "license" as defined in N.J.A.C 7:26-16.2, and is also an applicant for a new 5-year license. Flowen Oil also holds a hazardous waste transporter license, No. S-8156.

97. Pursuant to N.J.S.A. 13:1E-12, the Department may revoke a license upon a finding that the licensee has violated any provision of the Solid Waste Management Act or any rule, regulation or administrative order promulgated under the Act, or has violated any provision of any laws related to pollution of waters, or land surfaces of the State.

98. Pursuant to N.J.S.A. 13:1E-5.c., the Department may deny a license to an applicant for causes that would result in license revocation under N.J.S.A. 13:1E-134.a. Pursuant to N.J.S.A. 13:1E-134.a., the Department may revoke a license for any cause which would require license denial under N.J.S.A. 13:1E-133.a., b., c. or e. or for any other cause set forth in N.J.S.A. 13:1E-134.

99. Based on the findings set forth above, the Department finds that Flowen Oil is subject to having its hazardous waste facility license and its hazardous waste transporter license revoked and/or renewal or issuance of those licenses denied, on the following grounds:

100. Pursuant to N.J.S.A. 13:1E-12.a., for the specific statutory and regulatory violations summarized in paragraphs 65 through 69 above;

101. Pursuant to N.J.S.A. 13:1E-5.c., in that the operation of Flowen Oil under the control or influence of National Corporate Disposal, Daniel Tarrats and/or Albert Tarrats warrants a findings that Flowen Oil cannot be relied upon to operate its business in accordance with the standards set forth in the Solid Waste Management Act and the regulations promulgated under the Act's authority;

102. Pursuant to N.J.S.A. 13:1E-133.a., in that Daniel Tarrats, Albert Tarrats, NCD and Flowen Oil have demonstrated a lack of reliability in following the requirements of the law and regulations governing transportation and disposal of hazardous waste, which gives rise to a significant doubt that they can be trusted to manage hazardous wastes which have potential for causing harm to human health and the environment;

103. Pursuant to N.J.S.A. 13:1E-133.b., in that Albert Tarrats was convicted of violating N.J.S.A. 13:1E-9.e.(2), a criminal provision of a state environmental protection law;

104. Pursuant to N.J.S.A. 13:1E-133.d., in that there is pending against Daniel Tarrats and NCD an indictment, No. SGJ 140-87-1, which charges offenses enumerated in N.J.S.A. 13:1E-133.b.

105. Pursuant to N.J.S.A. 13:1E-133.e, in that Daniel Tarrats and Albert Tarrats, in their management of Barone Hazardous Waste Management Corporation, National Corporate Disposal, Flowen Oil, and other enterprises, have repeatedly pursued economic gain in an occupational manner or context which is in violation of the criminal or civil public policies of this State, and their pursuit has created a reasonable belief that their further participation in the solid/hazardous waste disposal industry would be inimical to the policies of N.J.S.A. 13:1E-126 et seq.;

106. Pursuant to N.J.S.A. 13:1E-134.b., in that Flowen Oil and/or its agents, Daniel Tarrats, Albert Tarrats and NCD, committed fraud, deceit and misrepresentation in securing a license for Flowen Oil, by concealing the Tarrat's interest in the company from NJDEP; and committed fraud, deceit and misrepresentation in the conduct of Flowen's licensed activity, by permitting Flowen's name to be used to create false impressions as to the transportation of certain hazardous wastes, as set forth in paragraphs 43 through 70 above.

107. Notice is given that license revocation or denial may be based upon any of the grounds cited in paragraphs 100 through 106 above, singly or in combination; and further that revocation or denial may be based upon any of the statutory or regulatory violations set forth in the Findings section of this notice, singly or in combination.

108. Notice is further given that license revocation pursuant to this Notice shall also constitute denial of Flowen Oil's application for a new hazardous waste facility permit. This Notice shall constitute both notice of intent to deny and to terminate pursuant to N.J.A.C. 7:26-12.7(a)5, 7:26-12.11(a) and 7:26-12.13(d).

109. Flowen Oil is entitled to an administrative hearing on this Notice. Failure to submit a timely hearing request will be deemed a waiver of Flowen Oil's right to a hearing, and will result in automatic revocation of Flowen's license and/or denial with prejudice. Operation of a hazardous waste facility without authorization from NJDEP can result in civil and criminal penalties under N.J.S.A. 13:1E-9.

NOTICE OF RIGHT TO A HEARING

110. Pursuant to N.J.S.A. 52:14B-1 et seq., N.J.S.A. 13:1E-12, and 13:1E-134, Flowen Oil, NCD, Daniel Tarrats and Albert Tarrats are entitled to an administrative hearing this Notice, except that Flowen Oil is not entitled to an administrative hearing on that portion of this notice denominated "Order", paragraphs 80-82 inclusive. Any hearing request shall be delivered to the address referenced in paragraph 93 within (20) calendar days from receipt of this Administrative Order, Notice of Civil Administrative Penalty Assessment and Notice of Intent to Revoke/Deny Hazardous Waste Licenses.

111. Pursuant to N.J.S.A. 52:14B-9(b) and N.J.A.C. 1:1-6.1(b), any person who requests a hearing shall furnish NJDEP with the following:

a. A statement or the legal authority and jurisdiction under which the hearing or action to be taken is to be held;

b. A reference to the particular section of the statutes and rules involved;

c. A short and plain statement of the matters of fact and law asserted; and

d. The provisions of these Notices to which the party objects, the reasons for such objections, and any alternative provisions proposed.

ADDITIONAL PROVISIONS

112. This Administrative Order, Notice of Civil Administrative Penalty Assessment, and Notice of Intent to Revoke/Deny Hazardous Waste Licenses (hereinafter "Administrative Order and Notices") is binding on Flowen Oil, National Corporate Disposal, Inc., Daniel Tarrats a/k/a Michael Danna and Albert Tarrats a/k/a Allan Carr, their 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.

113. Notice is given that violations of any statutes, rules or permits other than those cited herein may be cause for additional enforcement actions, either administrative or judicial. By issuing this Administrative Order and Notices the Department does not waive its right to institute additional enforcement actions.

114. No obligations imposed by this Administrative Order and Notice (with the exception of paragraphs 90-94 above) are intended to constitute a debt, damage claim, penalty or other civil action which could be limited or discharged in a bankruptcy proceeding. All obligations are imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety, welfare and environment.

115. Notice is given that pursuant to N.J.S.A. 13:1E-9.e., the Department is authorized to assess a civil administrative penalty of not more than $25,000.00 for each violation and additional penalties of not more than 2,500.00 for each day during which the violation continues.

116. Notice is further given that pursuant to N.J.S.A. 13:1E-9.f., any person who violates N.J.S.A. 13:1E-1 et seq. or any code, rule or regulation promulgated thereunder shall be liable to a penalty of not more than $25,000.00 per day of such violation, and each day's continuance of the violation shall constitute a separate violation.

117. Notice is further given that pursuant to N.J.S.A. 13:1E-9.f., any person who violates an administrative order issued pursuant to N.J.S.A. 13:1E-9.c., or a court order issued pursuant to N.J.S.A. 13:1E-9.d, or who fails to pay a civil administrative penalty in full after it is due shall be subject upon order of a court to a civil penalty not exceed to $50,000.00 per day of such violations, and each day's continuance of the violations shall constitute a separate violation.

118. Except as provided above in the Notice of Right to a Hearing Section, this Administrative Order and Notices shall be effective upon receipt.

DATE: 11-6-87

Ronald T. Corcory

RONALD T. CORCORY
Assistant Director - Enforcement
Division of Hazardous Waste Management

REFERENCE NO. 72

NOV 1987
RECEIVED
STERNS, HERBERT, WEINROTH & PETRINO, P.A.

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PR

IN THE MATTER OF FLOWEN OIL DELAWARE VALLEY, INC., NATIONAL CORPORATE DISPOSA, INC. DANIEL TARRATS A/K/A MICHAEL DANNA and ALBERT TARRATS A/K/A ALAN or ALLAN CARR	:	ADMINISTRATIVE CONSENT ORDER GRANTING ADMINISTRATIVE HEARING AND STAY ON CONDITIONS

The Department of Environmental Protection (hereinafter DEP) having issued an ADMINISTRATIVE ORDER, NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT and NOTICE OF INTENT TO REVOKE/DENY HAZARDOUS WASTE LICENSES, dated November 6, 1987, requiring, among other things, the immediate shutdown of Flowen Oil Delaware Valley, Inc. (hereinafter FODV); and FODV having requested an administrative hearing on said order and having further requested a stay of paragraphs 80, 81, 82 and 90 of said administrative order; and

FODV having submitted in support of its requests an affidavit of Joe C. Norman, the president of FODV, dated November 17, 1987, which is attached hereto and made a part hereof; and the parties having reached agreement on appropriate terms and conditions, the following administrative order is hereby issued with the consent of the parties:

I. DEP hereby grants, solely to FODV, the administrative hearing requested by FODV in its letter to the Department of November 12, 1987, to be scheduled on an expedited basis.

II. DEP hereby grants, solely to FODV, a stay of paragraphs 80, 81, 82 and 90 of the Administrative Order of November 6, 1987, pending said administrative hearing, on the following conditions:

(a) FODV and any of its successors or assigns shall not have any relationship whatsoever with either National Corporate Disposal, Inc., or any of its successors or assigns (hereinafter NCD) Daniel Tarrats (a/k/a Michael Danna), Albert Tarrats (a/k/a Alan or Allan Carr) or any of them, (hereinafter collectively "the individuals"), including specifically, but without limitation, any relationship as customer, employee, agent, independent contractor, broker. sales representative, marketing representative, promoter or source of business referrals; and

(b) FODV shall not directly or indirectly obtain in any form any funds, contributions, loans, credit, investment or any other form of financing or capital or promise thereof from NCD, the individuals or any of them.

III. It is expressly understood, agreed to and ordered that the granting of the administrative hearing request and the issuance of the stay by DEP in this Order is expressly based upon FODV's compliance with each of the conditions set forth in this Order. Pursuant to this Order, FODV's failure to comply with any of said conditions shall result in immediate termination of the stay and revocation of the grant of the hearing request, and shall require immediate termination of all operations by FODV, except as may be required to effect its closure plan. This Order shall be fully enforceable in the Superior Court of New Jersey as any other administrative order of the Department issued pursuant to its statutory authority.

Except to the extent expressly modified hereby, the Administrative Consent Order previously entered into by the parties on November 18, 1986 remains in full force and effect and enforceable pursuant to its terms. In consenting to the within Administrative Order granting FODV's hearing request and stay neither party intends any concession as to the issue of FODV's right to an administrative hearing as raised by FODV.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Date 11-23-87

By Ronald T. Corcory

Ronald T. Corcory
Assistant Director
Division of Hazardous Waste Management

FLOWEN OIL DELAWARE VALLEY, INC.

Date 11-20-87

By

Joe T. Norman
President

REFERENCE NO. 73

Form DEP-061 C
9/88

Logged 12-20-88

PAGE 1 OF ___

12-15-88 [illegible]

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DUTY OFFICER NOTIFICATION REPORT

CASE NO. 88 (Yr) - 12 (Mo) - 14 (Day) - 1302 (Time)

DATE 12 (Mo) - 14 (Day) - 88 (Yr) REC'D BY R23 TIME ___

INCIDENT REPORT BY:
Name Paul Fleischman Phone 609-365-5544
Street ___
City ___ State ___
Affiliation/Title Flowen oil

INCIDENT LOCATION: ___ Transportation ___ Facility ___ Other: ___
Name (Site): Flowen oil Phone ___
Street 1800 Carmen St
City Camden County Camden State ___ Zip Code ___
Date of Incident: 12 (Mo) - 14 (Day) - 88 (Yr) Time: 1215

IDENTITY OF SUBSTANCE(S) SPILLED, RELEASED, ETC.: ___ Suspected ___ Unknown
Name of Substance(s) [Gas, Liquid, Solid]: Oil + water
Amount Released/Spilled UNK ___ Actual ___ Potential ___ Estimated Substance Contained (Y) N U
Type of Release/Spill: ___ Terminated ___ Continuous ___ Intermittent Hazardous Material (Y) N U

INCIDENT DESCRIPTION:
___ Fire ___ Explosion ___ Air Rel ___ Spill ___ MVA ___ Derailment ___ Smoke/Dust
___ Odors ___ Sewage ___ NJPDES ___ Noise ___ Wildlife ___ Illegal Dumping ___ Drums
X Equip Start-Up/Shutdown, Equip Fail/Upset, etc. Cracked valve
___ Other (specify) ___

Injuries	Y (N) U	Public Exposure	Y (N) U
Facility Evacuation	Y (N) U	Fire Department at Scene	Y (N) U
Population Evacuation	Y (N) U	Police at Scene	Y (N) U
Potable Water Source	Y (N) U	Assistance Requested	Y (N) U
Contamination of ___ Air ✓ Land ___ Water		Precipitation	Y N U
Receiving Water ___		Wind Direction/Speed ___ / ___	

Location Type: ___ Residential ___ Industrial ___ Commercial ___ Rural ___ Sensitive Population (Hosp., School, Nurs. Home)
STATUS AT INCIDENT SCENE Valve Frozen and Now is cracked water and oil is contained Into

RESPONSIBLE PARTY: ___ Suspected ___ Unknown
Company Name Same as IL Phone ___
Contact ___ Title ___
Street ___
City ___ County ___ State ___ Zip Code ___

OFFICIALS NOTIFIED (Name/Title): JACK ALLEN - IMMEDIATE 12-15-88
NJSP: ___ / ___ Phone ___ Date/Time ___ / ___ (T/M)
Local Health: Joan / ___ Phone ___ Date/Time 12-15 / 1023 (T/M)
Local Munic: ___ / ___ Phone ___ Date/Time ___ / ___ (T/M)
USEPA: ___ / ___ Phone ___ Date/Time ___ / ___ (T/M)

INCIDENT REFERRED TO:
___ DEQ ___ DWR ___ DSWM ___ DHSM X DHWM ___ DOH ___ DFG ___ DPF ___ DCJ ___ DCR
Region: ___ Northern ___ Metro ___ Central S Southern ___ ER1 ___ ER2 ___ BUST
1. Name/Affil Fax / ___ Phone ___ Date/Time 12/14 / 1355 (T/M)
2. Name/Affil ___ / ___ Phone ___ Date/Time ___ / ___ (T/M)
3. Name/Affil ___ / ___ Phone ___ Date/Time ___ / ___ (T/M)

DEP RESPONSE Emergency Immediate Priority No Response

COMMENTS ___

REFERENCE NO. 74

Form DEP-061 C
9/88

PAGE 1 OF ___

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DUTY OFFICER NOTIFICATION REPORT

logged 12-20-88

12-15-88 4pm.

CASE NO. 88 (Yr) - 12 (Mo) - 15 (Day) - 1109 (Time)

DATE 12 (Mo) - 15 (Day) - 88 (Yr) REC'D BY E. Stoop ESH TIME ___

INCIDENT REPORT BY:
Name Mr. Ross Phone (609) 365-5144
Street ___
City Flowen State ___
Affiliation/Title Flowen Oil Comp. - Gen Manager

INCIDENT LOCATION: Flowen Transportation ___ Facility ___ Other: ___
Name (Site): Flowen Oil Phone ___
Street 18 Carman St
City Camden County Camden State ___ Zip Code ___
Date of Incident: ___ (Mo) - 15 (Day) - ___ (Yr) Time: 1100

IDENTITY OF SUBSTANCE(S) SPILLED, RELEASED, ETC.: ___ Suspected ___ Unknown
Name of Substance(s) [Gas, Liquid, Solid]: WASTE OIL
Amount Released/Spilled 50 gal ___ Actual ___ Potential ___ Estimated Substance Contained Y N U
Type of Release/Spill: ___ Terminated ___ Continuous ___ Intermittent Hazardous Material Y N U

INCIDENT DESCRIPTION:
___ Fire ___ Explosion ___ Air Rel ___ Spill ___ MVA ___ Derailment ___ Smoke/Dust
___ Odors ___ Sewage ___ NJPDES ___ Noise ___ Wildlife ___ Illegal Dumping ___ Drums
___ Equip Start-Up/Shutdown, Equip Fail/Upset, etc. ___
___ Other (specify) ___

Injuries	Y N U		Public Exposure	Y N U	
Facility Evacuation	Y N U		Fire Department at Scene	Y N U	
Population Evacuation	Y N U		Police at Scene	Y N U	
Potable Water Source	Y N U		Assistance Requested	Y N U	
Contamination of	___ Air	___ Land ___ Water	Precipitation	Y N U	
Receiving Water	___		Wind Direction/Speed	___	

Location Type: ___ Residential ___ Industrial ___ Commercial ___ Rural ___ Sensitive Population (Hosp., School, Nurs. Home)
STATUS AT INCIDENT SCENE Over fill of tank - Company doing clean-up

RESPONSIBLE PARTY: Flowen Suspected ___ Unknown
Company Name Flowen Oil Company Phone ___
Contact ___ Title ___
Street 18 Carman St
City Camden County Camden State ___ Zip Code ___

OFFICIALS NOTIFIED (Name/Title):

NJSP:	/	Phone	Date/Time /	(T/M)
Local Health: Camden HD	/	Phone Faxed	Date/Time 12/15 / 1205	(T/M)
Local Munic:	/	Phone	Date/Time /	(T/M)
USEPA:	/	Phone	Date/Time /	(T/M)

INCIDENT REFERRED TO: Allen - Routine 12-15-88

___ DEQ ___ DWR ___ DSWM ___ DHSM ✓ DHWM ___ DOH ___ DFG ___ DPF ___ DCJ ___ DCR
Region: ___ Northern ___ Metro ___ Central ✓ Southern ___ ER1 ___ ER2 ___ BUST

1. Name/Affil	/	Phone Faxed	Date/Time 12/15 / 1208	(T/M)
2. Name/Affil	/	Phone	Date/Time /	(T/M)
3. Name/Affil	/	Phone	Date/Time /	(T/M)

DEP RESPONSE Emergency Immediate Priority No Response

COMMENTS Refer - To HAZ WASTES
Camden HD

REFERENCE NO. 75

NUS CORPORATION

II

0712

1-15-91

FLOWER OIL DELAWARE VALLEY CORP.
02-9011-20
TDD MANAGER-K. INDELICATO
LOGBOOK #0712
JANUARY 15, 1991

GUIDANCE FOR PROPER USE OF LOG BOOKS

Purpose

- Serves to document onsite activities and be understandable to an outside reader.
- Provides the basis for later written reports.
- Used an an evidentiary document and may be used in legal proceedings.

Distribution

- Controlled by the project manager and distributed as appropriate to personnel designated by the project manager.

General Procedures

- Record information in language which is objective and factual.
- Use ink. Waterproof ink is recommended.
- Leave first two pages blank. They serve as space for the table of contents to be added when the log book is complete.
- The first written page identifies the date, time, TDD number, site name, location, NUS personnel and their responsibilities, other non-NUS personnel and observed weather conditions.
- Start on a new page at the start of each day's field activities. This page should identify date, time, TDD number, site name and location, NUS personnel and their responsibilities, other non-NUS personnel and observed weather conditions.
- List all persons leaving or entering the site.
- Information recorded in the log book should be in chronological order.
- Sign and date each page, log all entries using a 24 hour clock. Entries should be time logged every 15 to 30 minutes.
- Corrections are to be lined through and initialed. No erroneous notes are to be made illegible.
- Include a sketch or map of the site which can be used to locate photo or sample locations. Note landmarks, indicate north, and if possible include an approximate scale. Include as many sketches and maps as necessary.
- A person not present when field activities were being documented should read each completed page, and countersign and date when satisfied that the written notes are understandable.

Specific Field Activities To Be Documented

- Record the who, what and where of field activities.
- Indicate sampling and photo locations on a site sketch or map.
- As part of the chain of custody procedure, recorded in-situ sampling information must include sample number, date, time, sampling personnel, sample type, designation of sample as a grab or composite, and any preservative used.
- Information for in-situ measurements must include a sample ID number, the date, time, and personnel taking measurements. Pertinent in-situ measurements include but are not limited to pH, temperature, conductivity, flow measurements, continuous air monitoring measurements, and stack gas analysis. If infield calculations are necessary they must be checked and signed by a second team member.
- Create a photo log to document photos taken in the field. These must include date, time, photographer, sample number, roll number, frame number, photo ID number and description. Indicate if the film is for slides or prints in the column for roll number. Photo ID numbers can be added at the time the photo log is assembled.
- Record onsite health and safety measures used. Describe observed potential hazards to health and safety. Document the level of protection used, decontamination procedure used and specific decontamination solutions.
- When sampling is complete, a summary log is to be completed. It must include date, time, sample number, description, field book reference page, and the number and date of the chain of custody from on which the sample is listed. Indicate whether or not the sample was split.
- Record details regarding relevant information obtained during onsite interviews. Include names of persons interviewed, the interest group represented, their address and phone number.
- Record any other relevant information which would be difficult to generate at a later date.

Flower Oil Delaware Valley Corp
02-9011-20

Table of Contents

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17 Site Inspection

27 Photograph log - Site Inspection

Flowen Oil Delaware Valley Corp.
Camden, Camden Co. NJ 02-9011-20

January 23, 1991

On-Site Reconnaissance:

NUS Personnel:
Kathy Indelicato - SM Kathy Indelicato 1-23-91
Joel Filosa - SSO [signature] 1/23/91
Bill Foss - Support [signature] 1/23/91
Keith Billy - Support [signature] 1-23-91

The above personnel have read and understand the Workplan and QA/QC procedures

Weather: Sunny, 30°, wind from the south at approx. 10 mph

Non-NUS Personnel: Both of Pentcon Environmental
- Cheryl Williams
- Karen Fisher

REMTECH
ENVIRONMENTAL
GROUP

CHERYL A. WILLIAMS
Regulatory Compliance Manager

1800 Carman Street
Camden, NJ 08105

609-365-5544
FAX 609-365-0801

[signature] 2-1-91 Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
02-9011-20

Equipment Numbers:

OVA - "E" - 307135
HNu - "D" (K) ~~11.7~~ 10.2 probe - 307144
Camera (print) 731692
Camera (slide) 428512
Compass 684179
mini-rad 469785
M-Scope 629764
SCBAs - B Foss - 307169
K Billy - 165530
J Filosa - 192034
K Indelicato - 428551

1300 arrived at site - met w/ Cheryl Williams - set up decon pad

1305 mini-rad background - 10 cpm
OVA - 0 ppm
HNu - 0 ppm

Lauren Leitman 2-1-91

Kathy Indelicato 1-23-91

Flowers Oil Delaware Valley Corp
02-9011-20

1315 Karen Fisher of Pentech meets us

1320 J Filusa gives safety meeting
- proceeding to tank storage area

1321 - X721 - X728 NJ waste oil - only
waste accepted at site
solids are skimmed after being separated
from oil
17 15,000 gal. tanks in tank farm
wastewater treatment tank Tank #8

#C3 ultra filter feed
#11 reverse osmosis feed tank

#C1 & C2 out of service - usually
ultra filter feed

Jacketted tanks heated w/ steam
heat - #2358
Photo 1PL - looking E at tank farm

1325 all storm drains are plugged
all storm water is treated in
wastewater treatment area - No
storm runoff or process water flows
directly into sewer system

Kathy Fudelicato 1-23-91

Laura Lebow 2-1-91

Flowen Oil Delaware Valley Corp
02-9011-20

Tank farm - bermed, fed by manifold

1327 Photo 1P2 looking west at loading box for incoming waste oil - no readings on OVA or HNu

1330 drums of process chemicals - polymer treatment, cleaning for ultrafilter - located E of process house, no readings on OVA or HNu

photo 1P3, looking W at drums of process chemicals

1331 photo 1P4 of Tank Farm, looking NW at tanks of incoming waste

no readings on HNu or OVA at tank farm

Laura Lutay 2-1-91

Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
02-9011-20

At wastewater treatment system
1335 pre-treatment tanks 4 fiberglass
2 - 3000 gal
2 - 4000 gal

photo 1 P5 confidential! looking NW at pre-treatment tanks

1336 photo 1P6 look NW at pre-treatment facility - Confidential!

No readings on OVA or HNu

photo 1P7, looking NE at finished
1340 product tanks (4) after ultracentrifuging water & oil from pretreatment system
4 tanks hold oil used as heating oil for industry. 25,000 gal each

1342 Solid storage drums - from cleaning out tanks, centrifuges & dirty clothing
X725, X728 - labelled

photo P8 - looking S at solid waste drums - no readings on OVA or HNu

Laura Lang 2-7-91 Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
02-9011-20

Photo 1P9 looking W at
1345 empty drum storage area
no readings on OVA or HNU

1350 - returned to decon pad to suit
up to check monitoring wells

1400 K Billy, B Foss go on air, J Filosa backup
opening MW2
no readings HNU in well

OVA - 10x scale - off scale - in well
100x scale - off scale

Methane check - needle drops

no readings on OVA or HNU in
breating zone

Lauren Lutz 2-1-91 Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
02-9011-20

checking water (K1) level of MW2 w/ M-scope -
1410 37'8" to bottom - from top of stack
no water in well
2' stick-up

1415 K Billy, B Foss go off air

1420 at MW2 (K1) 3
K Billy, B Foss go on air
open well

No reading HNu or OVA in well
or in breathing zone

water at 31' 3" from top of
~~casing~~ (K1) stack

41' 9" from top of stack to
bottom of well

2' stick-up -

Lauren LaFaye 2-1-91 Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
07-9011-20

1427 K Billy, B Fess go off gr - MW1 is located under trailer, we will not check water level

1430 photo looking W at facility, panorama - 1P10, 1P11, 1P12

1432 return to decon pad

1445 left site

Laura Lutzy 2-7-91 Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
02-9011-20

Additional Comments:

Pemtecn Environmental (formerly Flower Oil Delaware Valley Corp.) processes waste oil into final product + solid/sludge + wastewater. Incoming trucks unload waste oil into waste receiving area loading box. Oil is pumped into an incoming waste tank, water goes to the wastewater treatment system. The oil is chemically & physically treated. The component parts are (1) product oil - stored in final product tanks & then sold to industry as a heating oil. (2) solid & sludge waste is stored in 55 gal. drums & then shipped off-site (3) wastewater is processed through wastewater treatment system. The wastewater treatment system is considered confidential + proprietary. The facility is completely paved & surrounded by a curb. The two tank storage areas are surrounded by trenches & containment dikes. Only the western half of the property is in use - the eastern half is a vacant, grass-covered lot. The site is surrounded by a fence. All storm drains on the site have been plugged - all runoff on the site goes to the wastewater treatment system. The site is surrounded by

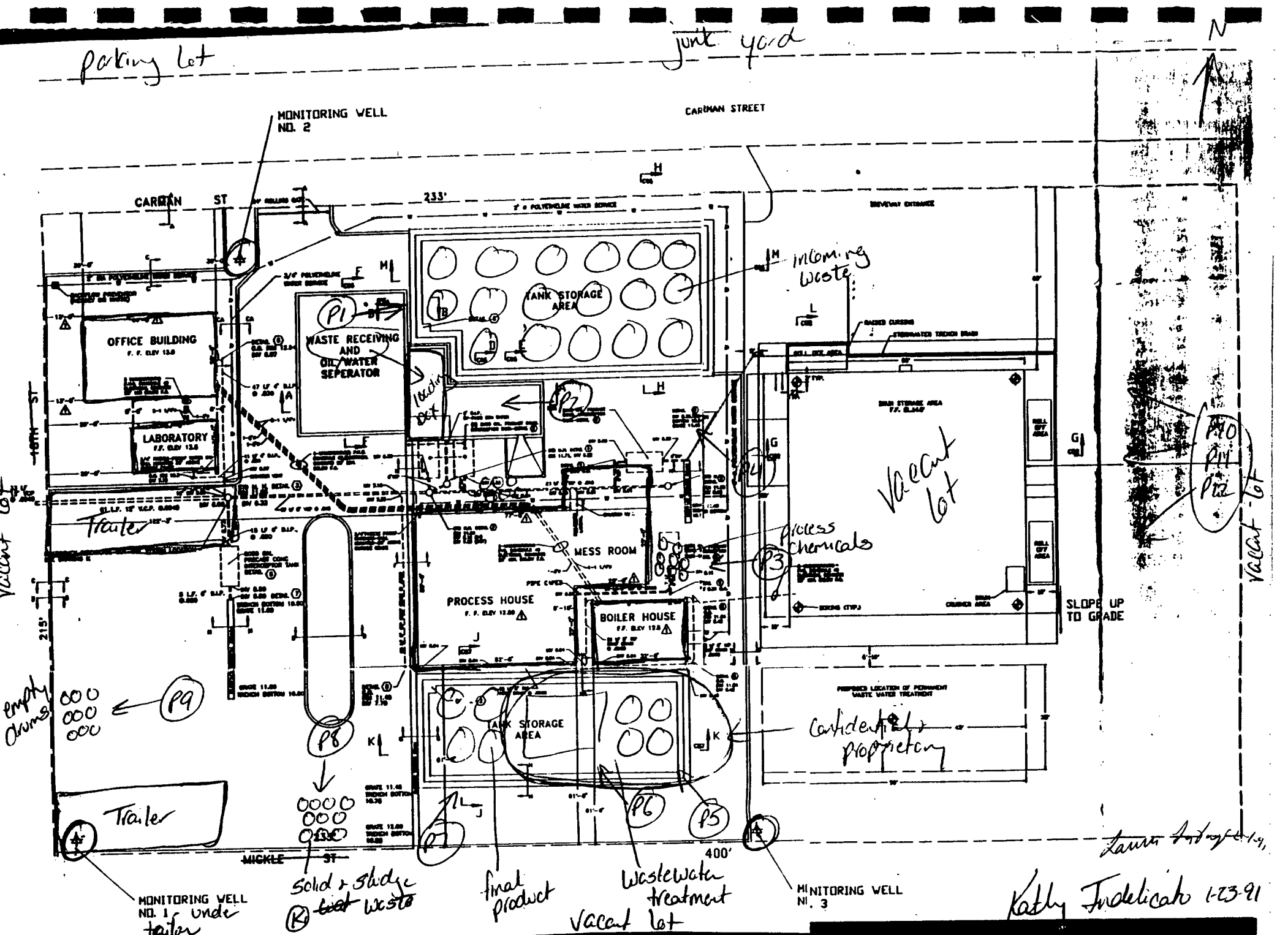
Laura Libby 2-1-91 Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
02-9011-20

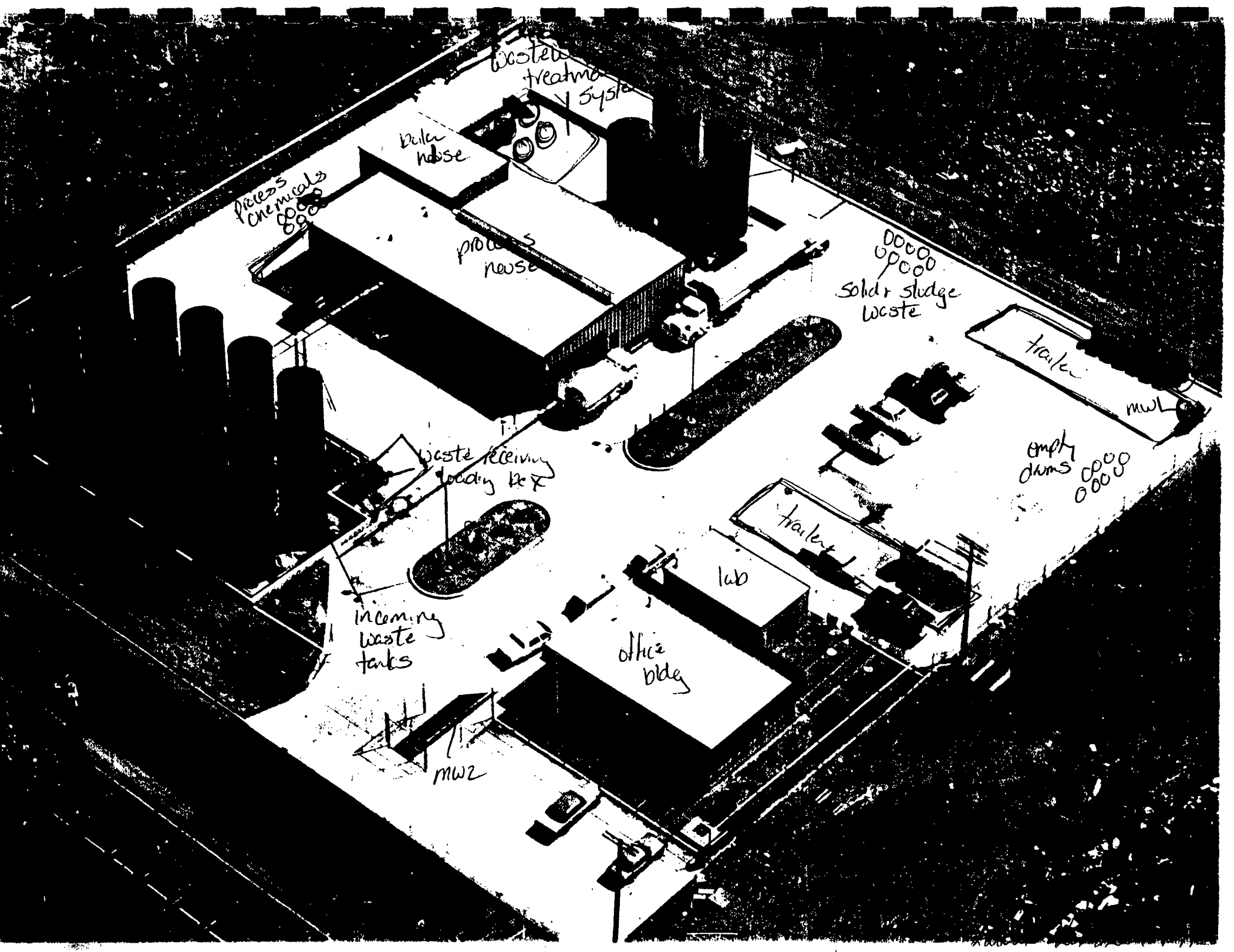
Additional Comments (Cont)

Vacant lots on the east, west & south. Carmon St lies to the north of the site. A parking lot & a junk yard are on the other side of Carmon St. Due to cold weather, (there are few incoming waste trucks) - only 3 employees are currently working at the site

Laura Lilly 2-1-91 Kathy Indelicato 1-23-91



parking lot
junk yard
N
MONITORING WELL NO. 2
CARMAN STREET
CARMAN ST
233'
OFFICE BUILDING
LABORATORY
WASTE RECEIVING AND OIL/WATER SEPERATOR
TANK STORAGE AREA
incoming waste
loading dock
P1
P2
P3
P4
P5
P6
P7
P8
P9
P10
P11
P12
Vacant lot
Trailer
MESS ROOM
PROCESS HOUSE
BOILER HOUSE
process chemicals
SLOPE UP TO GRADE
Vacant lot
empty drums
Confidential & proprietary
Trailer
MICKLE ST
400'
MONITORING WELL NO. 1 under trailer
solid & sludge waste
final product
wastewater treatment
Vacant lot
MONITORING WELL NO. 3
Kathy Indelicato 1-23-91


wastewater treatment system
boiler house
process chemicals
process house
solid sludge waste
trailer
MW1
empty drums
waste receiving loading dock
trailer
lab
incoming waste tanks
office bldg
MW2

Flower Oil Delaware Valley Corp
02-9011-20

Photograph Log

All photos taken by Kathy Indelicato
On 1-23-91

Photo #	Description	Time
IP-1	looking E at incoming waste tank farm	1321
IP-2	looking W at incoming waste loading box	1327
IP-3	looking W at drums of process chemicals	1330
IP-4	looking NW at incoming waste tank farm	1331
IP-5	looking NW at wastewater pre-treatment tanks	1335
IP-6	looking NW at wastewater treatment facility	1336
IP-7	looking NE at finished product tanks	1340

Laura Lotz 2-1-91 Kathy Indelicato 1-23-91

Flower Oil Delaware Valley Corp
02-9011-20

Photograph log (Continued)

Photo #	Description	Time
IP-8	looking S at drums of solid waste	1342
IP-9	looking W at empty drum storage area	1345
IP-10, 11, 12	looking W at facility (panorama)	1430

Kathy Indelicato 1-23-91

Flowers Oil Delaware Valley Corp.
Camden, Camden Co., NJ 02-9011-20

March 5, 1991

Site Inspection

NUS, Personnel:
Kathy Indelicato - SM Kathy Indelicato 3-5-91
Bill Foss - SMO [signature] 3/5/91
Keith Billy - SSO Keith Billy 3-5-91
Joe Filosa - Sampler [signature] 3/5/91
Anthony Bonasera - Sampler Anthony Bonasera 3/5/91

The above personnel have read and understand the Workplan and QA/QC procedures

Weather: Partly cloudy, 40°F, wind from N, ≈ 5-10 mph

Non-NUS Personnel:
Cheryl Williams - Remtech
Karen Fisher - Remtech

Jennifer Leahy 3/11/91 Kathy Indelicato 3-5-91

Flower Oil Leakage Valley Corp 02-9011-20

WELL CASING-VOLUME

CONVERSION CHART (Gallons)

WELL CASING DIAMETER (INCHES)

DEPTH OF WATER COLUMN (FT)	1.0	1.5	2.0	3.0	4.0	6.0	8.0	10.0	12.0	14.0	16.0	18.0	24.0	36.0	48.0
1.	.004	009	016	037	065	.15	.26	.41	.59	.80	1.04	1.32	2.35	5.29	9.40
.5	.02	05	.08	18	33	73	1.3	2.0	2.9	4.0	5.2	6.6	11.7	26.4	47.0
1.0	.04	09	.16	37	65	1.5	2.6	4.1	5.9	8.0	10.4	13.2	23.5	52.9	94.0
2.0	08	18	33	73	1.3	2.9	5.2	8.2	11.7	16.0	20.9	26.4	47.0	105.8	188.0
4.0	.16	36	.65	1.5	2.6	5.9	10.4	16.3	23.5	32.0	41.8	52.9	94.0	211.5	376.1
6.0	.24	.45	.98	2.2	3.9	8.8	15.7	24.5	35.3	48.0	62.7	79.3	141.0	317.3	564.1
8.0	.33	73	1.3	2.9	5.2	11.7	20.9	32.6	47.0	64.0	83.6	105.8	188.0	423.1	752.2
10.0	.41	92	1.6	3.7	6.5	14.7	26.1	40.8	58.8	80.0	104.5	132.2	235.1	528.9	940.2

Kathy Indelicato 3-5-91

Jennifer Leahy 3/11/91

Jenny

Flower Oil Delaware Valley Corp.
02-9011-20

Equipment Numbers

Camera (print) - 731693
Camera (slide) - 307126
Compass - 684178
Monitor 4 - 731689
HNu "J" - 469745 10.2 probe
OVA "F" - 307137
M-scope - 629764
Conductivity per ~~629-774~~ (K) 629774
SCBAs - K. Billy - 192084
~~B. Foss~~ - (K)
A. Benasera - 192083
J. Filosa - 307169

0930 arrived at site - met with Cheryl Williams - we will split all samples with Pentech

Set up decon pad

Jennifer Leahy 3/11/91

Kathy Indelicato 3-5-91

Flower Oil Delaware Valley Corp
02-9011-20

0948 B. Foss prepares trip blank. TBLK1

Kathy Indelicato 3-5-91

Jennifer Leahy 3/11/91

Flower Oil Delaware Valley Corp
02-9011-20

0935 - will not be able to sample MW1, trailer could not be moved because drums of hazardous waste are stored to the east of it

0950 - all purge water from the wells will be collected in a 55-gal drum & then dumped into waste receiving box on site

all decon water & rinsate water will also be dumped into waste receiving box.

1000 - Calibrated Conductivity pen

1010 - A Bonasera & J Filosa decon sampling equipment

Background readings
OVA - 0 ppm
HNu - 0 ppm
Monitor 4 - 0 mR/hr

Jennifer Leahy
3-11-91

Kathy Indelicato 3-5-91

Flower Oil Delaware Valley Corp
02-9011-20

1023 - B Foss Collects RINI - Bailer rinsate

Kathy Indelicato 3-5-91

Jennifer Leahy
3-11-91

Jen

Flower Oil Delaware Valley Corp
02-9011-20

1035- K Billy gives tailgate safety meeting

1050 at MW2
A Banasera & J Filosa go on air,
K. Billy - back-up

1053 - open well - 800 ppm on OVA
0 ppm on HNU

1057- measuring water level w/ M-Scope
22½' to top of casing
(2' stick up) from well bottom -
NO WATER IN WELL

1100- A Banasera & J Filosa go off air.

Jennifer Leahy
3-11-91

Kathy Indelicato 3-5-91

Flower Oil Delaware Valley Corp
02-9011-20

1135 Volume of water in well MW3 - calculated from well casing-volume conversion chart

depth of water column - 45-31 = 14'
well casing diameter = 4"

Approx 9 gal = 1 well volume

will need to evacuate 27 to 45 gallons to get 3-5x well volume

Kathy Indelicato 3-5-91

Jennifer Leahy
3-11-91

Jennifer

Flower Oil Delaware Valley Corp
02-9011-20

1120- at ~~MW3~~ (K) MW3

1128- J Filosa + A Barasera go on air

1130 opening MW3- no readings on OVA or HNu

measuring water level w/ m-scope
31' to top of casing - water level

Bottom of well to top of casing
45'

no readings on OVA or HNu

Jennifer Healy 3-11-91

Kathy Indelicato 3-5-91

Flower Oil Delaware Valley Corp
02-9011-20

1138- J Filosa + A Barasera go off air

1205 - evacuating well w/ 4" submersible pump - pumped well dry
no readings on OVA or HNU
Approx 10 gal. of water evacuated into drum

1222 - Check water level w/ M-Scope
- no recharge

1230 return to decon pad

Jennifer Kaly
3-11-91

Kathy Indelicato 3-5-91

Flowen Oil Delaware Valley Corp
02-9011-RO

1415 - Checking water level in MW3
w/ ~~M~~ Scope

Water level at ~~30~~ 31' (A) from top
of casing

no readings on OVA or HNu

1450 - pH = 7 . 8 drops HCl to
lower pH to 2

Conductivity 1560 umhos/cm

VOAs Collected

1510 - Photo 1P-1, 15-1
J Filosa & A Benasera Collecting
GW1 & 2 from MW3

no readings on OVA or HNu

Collected split sample for Pentech

Jennifer Leahy
3-11-91

Kathy Indelicato 3591

Flower Oil Delaware Valley Corp
02-9011-20

1515 - Water brown - very silty

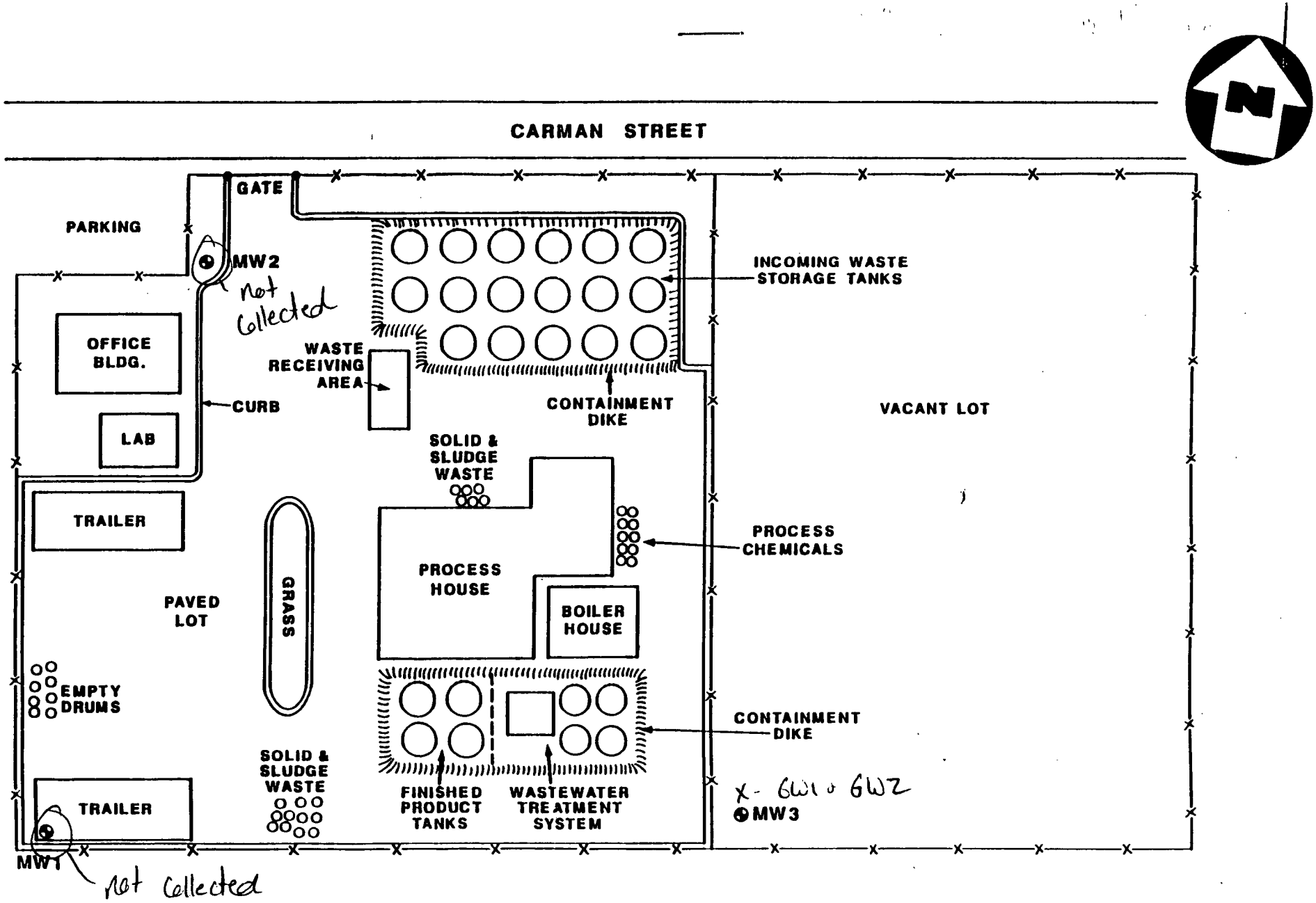
1545 Return to decon pad

1710 - left site

1740 - Dropped samples coolers off at Fed Ex

Jennifer Cleary 3-4-91

Kathy Indelicato 3-5-91



SITE MAP

FLOWEN OIL DELAWARE VALLEY CORP., CAMDEN, N.J.

NOT TO SCALE

FIGURE 2

NUS CORPORATION

Jennifer Daly 3-11-91

Kathy Tedeliczak 3.5.91

Flower Oil Delaware Valley Co.
02-9011-20

Photograph Log

All photos taken by Kathy Indelicato on 3-5-91

Photo #	Description	Time
1P-1	J. Filosa & A. Bonasera collecting GW1 & GW2	1510

Kathy Indelicato 3-5-91

REFERENCE NO. 76

SAMPLING TRIP REPORT

NJHV

SITE NAME:	Flowen Oil Delaware Valley Corp.
TDD NO.:	02-9011-20
SAMPLING DATES:	March 5, 1991
EPA CASE NO.:	16001

1. Site Location: See Figure 1
2. Sample Locations: See Figure 2
3. Sample Descriptions: See Table 1
4. Laboratories Receiving Samples:

Sample Type	Name and Address of Laboratory
Organic	Ceimic Corp. 100 Dean Knauss Dr. S. Terry Industrial Park Narragansett, RI 02882
Inorganic	Betz Laboratories, Inc. 4636 Somerton Rd. Trevose, PA 19047

STR1+2 ent

SS gen

5. Sample Dispatch Data:

A total of four aqueous samples for organic analysis were shipped by FIT 2 personnel via Federal Express under Airbill No. 9802407064 to Ceimic Corp. on March 5, 1991, at approximately 1738 hours.

A total of three aqueous samples for inorganic analysis were shipped by FIT 2 personnel via Federal Express under Airbill No. 9130259611 to Betz Laboratories, Inc. on March 5, 1991, at approximately 1739 hours.

6. On-site Personnel:

Name	Organization	Duties on Site
Kathy Indelicato	NUS Corporation, FIT 2	Site Manager, Written and Photographic Documentation
Keith Billy	NUS Corporation, FIT 2	Site Safety Officer
Bill Foss	NUS Corporation, FIT 2	Sample Management Officer
Joe Filosa	NUS Corporation, FIT 2	Sampler
Anthony Bonasera	NUS Corporation, FIT 2	Sampler

7. Weather Conditions:

Partly cloudy, 40° F, wind from the north at approximately 5-10 mph.

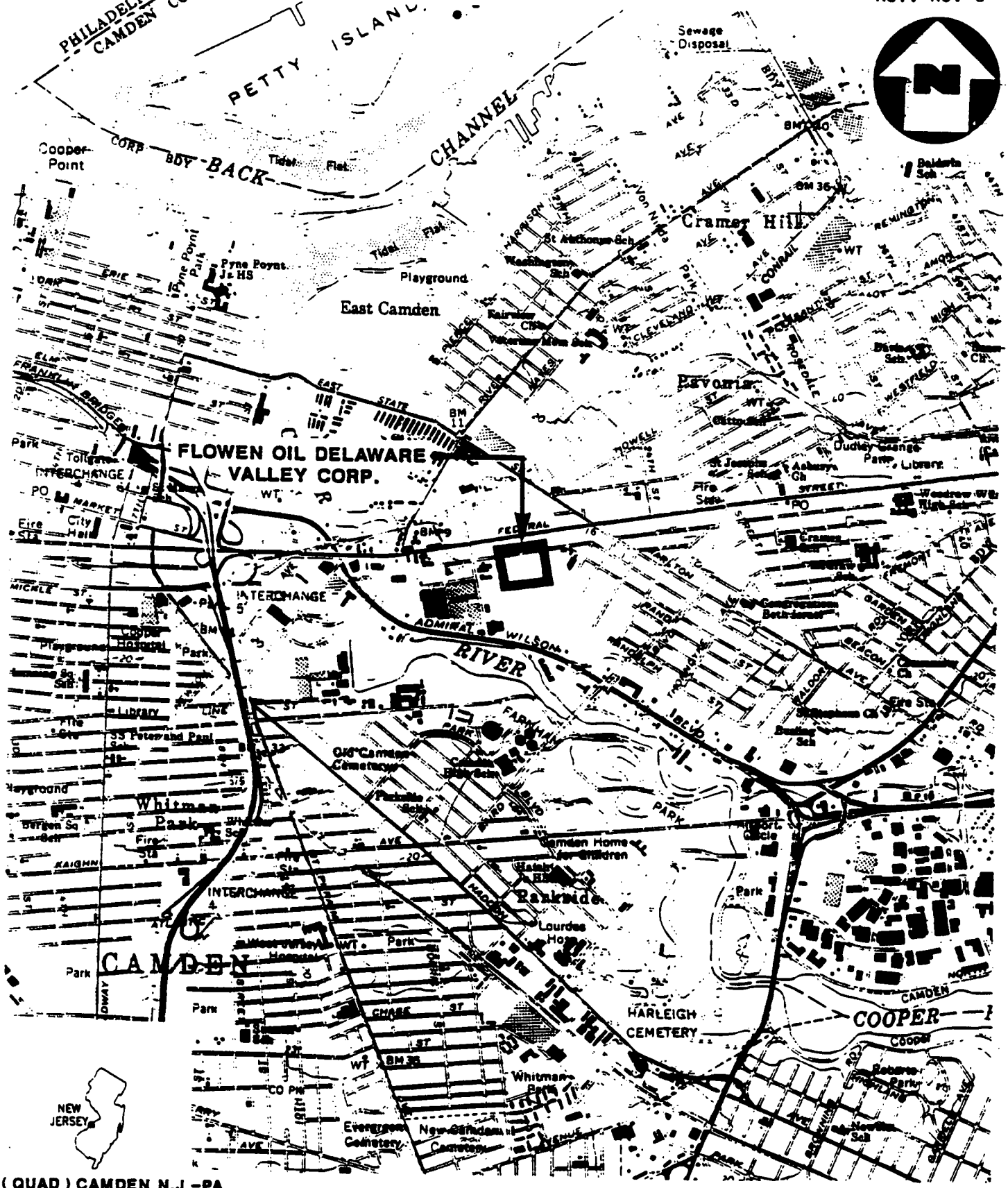
8. Additional Comments:

All samples except for the trip blank will be analyzed for Target Compound List (TCL) organic and inorganic compounds, excluding cyanide. The trip blank will be analyzed for volatile organic compounds only.

A trailer was parked over MW1, making it inaccessible to the sampling team. MW2 contained no water; therefore, it could not be sampled. No readings above background were detected on the OVA, HNu, or Monitor 4 at the sample location. Samples were split with Remtech Environmental Group.

9. Report Prepared By: Kathy Indelicato Date: March 7, 1991

10. Approved By: BM Naman Date: 3/13/91



(QUAD) CAMDEN N.J.-PA.

SITE LOCATION MAP

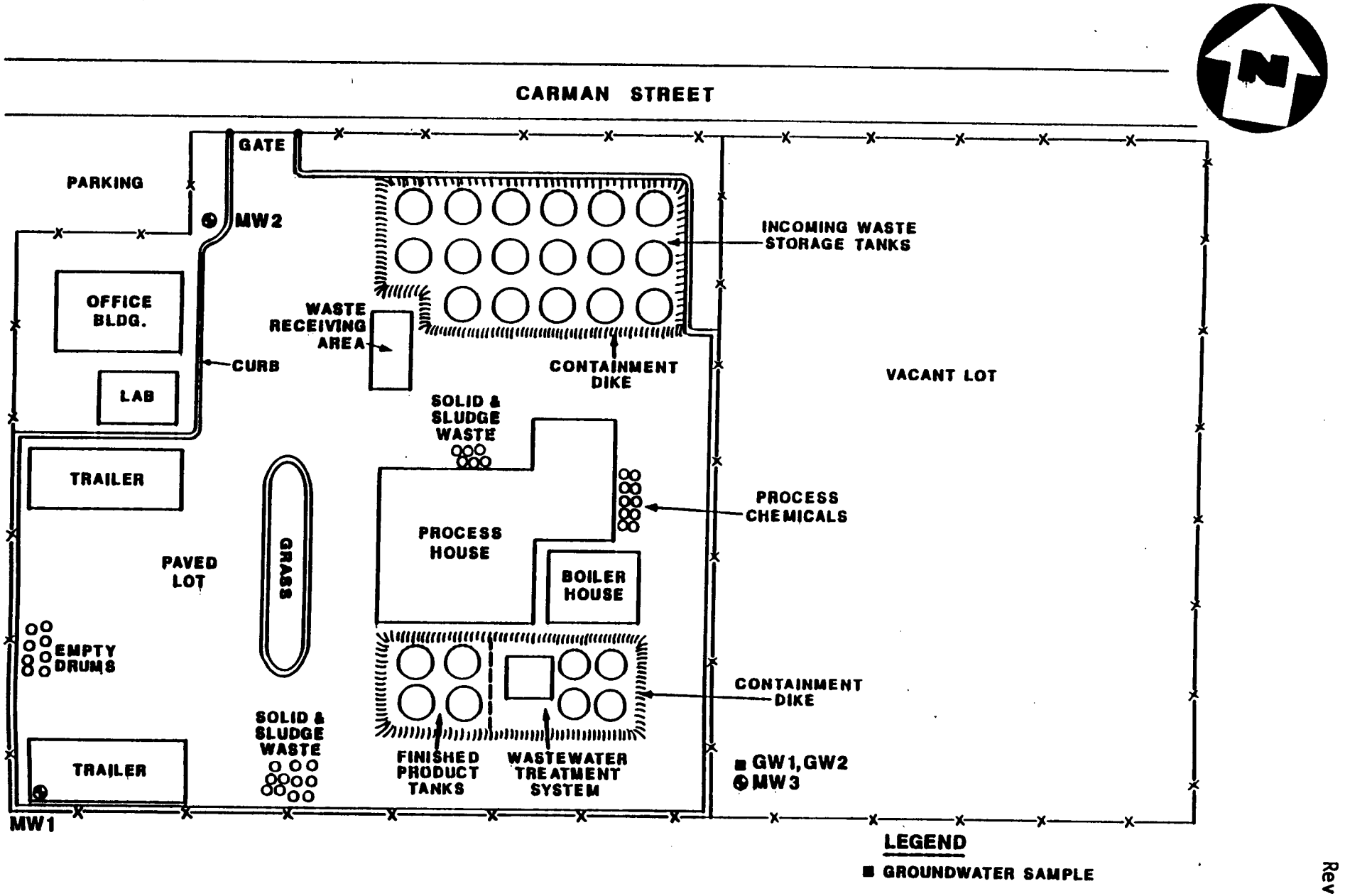
FLOWEN OIL DELAWARE VALLEY CORP.

CAMDEN, N.J.

SCALE: 1" = 2000'

FIGURE 1

NUS CORPORATION



SAMPLE LOCATION MAP

FLOWEN OIL DELAWARE VALLEY CORP., CAMDEN, N.J.

NOT TO SCALE

FIGURE 2

NUS CORPORATION

02-9011-20-STR
Rev. No. 0

TABLE I
SAMPLE DESCRIPTIONS
FLOWEN OIL DELAWARE VALLEY CORP.
CAMDEN, CAMDEN CO., NEW JERSEY
CASE NO. 16001

NUS Sample ID Number	CLP Organic Sample Number		CLP Inorganic Sample Number	Collection Time	Sample Type	Sample Location
NJHV-GW1*	BHE17	1.0	MBFQ14	1510	Aqueous	Groundwater sample collected from MW3.
NJHV-GW2**	BHE18	1.0	MBFQ15	1510	Aqueous	Same location as sample NJHV-GW1.
NJHV-RIN1	BHE21	1.0	MBFQ18	1023	Aqueous Rinsate Blank.	Bailer rinsate collected in the field.
NJHV-TBLK1	BHE22	1.0	N/A	0948	Aqueous Trip Blank	Trip blank; demonstrated analyte-free water obtained from NUS Region 2 FIT, Edison, NJ.

Notes:

* MS/MSD - Indicates that additional sample volume was collected and shipped to the laboratory for matrix spike (MS) and matrix spike duplicate (MSD) analysis.

** Duplicate - Indicates that a sample was designated for duplicate analysis.

N/A Not applicable

Report 2

ORGANIC REGIONAL DATA ASSESSMENT SUMMARY

CASE NO. 16CC1

SDG NO. BHE17

SOW 788

LABORATORY CENTRE

DATA USER FITZ

REVIEW COMPLETION DATE 5-6-91

NO. OF SAMPLES 4 WATER C SOIL C OTHER

REVIEWER [ ] ESD [ ] ESAT [X] OTHER, CONTRACT/CONTRACTOR FITZ

	VOA	BNA	PEST	OTHER
1. HOLDING TIMES	O	O	O	
2. GC-MS TUNE/ GC PERFORMANCE	O	O	O	
3. INITIAL CALIBRATIONS	O	O	O	
4. CONTINUING CALIBRATIONS	O	X	O	
5. FIELD BLANKS ('F' = not applicable)	O	O	O	
6. LABORATORY BLANKS	X	O	O	
7. SURROGATES	O	O	O	
8. MATRIX SPIKE/DUPLICATES	O	O	O	
9. REGIONAL QC ('F' = not applicable)	F	F	F	
10. INTERNAL STANDARDS	O	O		
11. COMPOUND IDENTIFICATION	O	O	O	
12. COMPOUND QUANTITATION	O	O	O	
13. SYSTEM PERFORMANCE	O	O	O	
14. OVERALL ASSESSMENT	O	O	O	

O = No problems or minor problems that do not affect data usability.
X = No more than *about* 5% of the data points are qualified as either estimated or unusable.
M = More than *about* 5% of the data points are qualified as estimated.
Z = More than *about* 5% of the data points are qualified as unusable.

DPO ACTION ITEMS:

AREAS OF CONCERN:

1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE17

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-01

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: F2553

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ Date Analyzed: 03/12/91

Column: (pack/cap) PACK Dilution Factor: 1.0

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NO.	COMPOUND		Q
74-87-3	Chloromethane	10	U
74-83-9	Bromomethane	10	U
75-01-4	Vinyl Chloride	1	J
75-00-3	Chloroethane	10	U
75-09-2	Methylene Chloride	6	~~B~~ U
67-64-1	Acetone	14	~~B~~ U
75-15-0	Carbon Disulfide	5	U
75-35-4	1,1-Dichloroethene	5	U
75-34-3	1,1-Dichloroethane	2	J
540-59-0	1,2-Dichloroethene (total)	11	
67-66-3	Chloroform	5	U
107-06-2	1,2-Dichloroethane	5	U
78-93-3	2-Butanone	10	U
71-55-6	1,1,1-Trichloroethane	5	U
56-23-5	Carbon Tetrachloride	5	U
108-05-4	Vinyl Acetate	10	U
75-27-4	Bromodichloromethane	5	U
78-87-5	1,2-Dichloropropane	5	U
10061-01-5	cis-1,3-Dichloropropene	5	U
79-01-6	Trichloroethene	5	U
124-48-1	Dibromochloromethane	5	U
79-00-5	1,1,2-Trichloroethane	5	U
71-43-2	Benzene	5	U
10061-02-6	Trans-1,3-Dichloropropene	5	U
75-25-2	Bromoform	5	U
108-10-1	4-Methyl-2-Pentanone	10	U
591-78-6	2-Hexanone	10	U
127-18-4	Tetrachloroethene	5	U
79-34-5	1,1,2,2-Tetrachloroethane	5	U
108-88-3	Toluene	5	U
108-90-7	Chlorobenzene	5	U
100-41-4	Ethylbenzene	5	U
100-42-5	Styrene	5	U
1330-20-7	Total Xylenes	5	U

1E

VOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

BHE17

ab Name: CEIMIC CORP Contract: 68D90056

ab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

atrix: (soil/water) WATER Lab Sample ID: 910128-01

ample wt/vol: 5.0 (g/mL) ML Lab File ID: F2553

evel: (low/med) LOW Date Received: 03/06/91

Moisture: not dec. ____ Date Analyzed: 03/12/91

olumn (pack/cap) PACK Dilution Factor: 1.0

umber TICs found: 3 CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1. 000000	Unknown	10.24	9.0	JN
2. 000000	Unknown	12.64	6.0	JN
3. 000000	Unknown	30.09	13	JN

1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE18

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-02

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: B9127

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ Date Analyzed: 03/11/91

Column: (pack/cap) CAP Dilution Factor: 1.0

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NO.	COMPOUND		Q
74-87-3	Chloromethane	10	U
74-83-9	Bromomethane	10 ~~1~~	~~BJ~~ U
75-01-4	Vinyl Chloride	10	U
75-00-3	Chloroethane	10	U
75-09-2	Methylene Chloride	5 ~~3~~	~~BJ~~ U
67-64-1	Acetone	10 ~~7~~	~~BJ~~ U
75-15-0	Carbon Disulfide	5	U
75-35-4	1,1-Dichloroethene	5	U
75-34-3	1,1-Dichloroethane	1	J
540-59-0	1,2-Dichloroethene (total)	9	
67-66-3	Chloroform	5	U
107-06-2	1,2-Dichloroethane	5	U
78-93-3	2-Butanone	10	U
71-55-6	1,1,1-Trichloroethane	5	U
56-23-5	Carbon Tetrachloride	5	U
108-05-4	Vinyl Acetate	10	U
75-27-4	Bromodichloromethane	5	U
78-87-5	1,2-Dichloropropane	5	U
10061-01-5	cis-1,3-Dichloropropene	5	U
79-01-6	Trichloroethene	5	U
124-48-1	Dibromochloromethane	5	U
79-00-5	1,1,2-Trichloroethane	5	U
71-43-2	Benzene	5	U
10061-02-6	Trans-1,3-Dichloropropene	5	U
75-25-2	Bromoform	5	U
108-10-1	4-Methyl-2-Pentanone	10	U
591-78-6	2-Hexanone	10	U
127-18-4	Tetrachloroethene	5	U
79-34-5	1,1,2,2-Tetrachloroethane	5	U
108-88-3	Toluene	5	U
108-90-7	Chlorobenzene	5	U
100-41-4	Ethylbenzene	5	U
100-42-5	Styrene	5	U
1330-20-7	Total Xylenes	5	U

VOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

BHE18

Lab Name: [illegible] Contract: [illegible]

Lab Code: [illegible] Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910129-02

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: B9127

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ Date Analyzed: 03/11/91

Column (pack/cap) CAP Dilution Factor: 1.0

CONCENTRATION UNITS: (ug/L or ug/kg) UG/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1. 000000	Unknown	[illegible]	6.0	BJ
2. 000000	Unknown	[illegible]	[illegible]	R
3. 000000	Unknown	[illegible]	[illegible]	R

1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE21

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-03

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: B9128

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ Date Analyzed: 03/11/91

Column: (pack/cap) CAP Dilution Factor: 1.0

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NO.	COMPOUND		Q
74-87-3	Chloromethane	3	J
74-83-9	Bromomethane	10	U
75-01-4	Vinyl Chloride	10	U
75-00-3	Chloroethane	10	U
75-09-2	Methylene Chloride	4	BJ
67-64-1	Acetone	10	U
75-15-0	Carbon Disulfide	5	U
75-35-4	1,1-Dichloroethene	5	U
75-34-3	1,1-Dichloroethane	5	U
540-59-0	1,2-Dichloroethene (total)	5	U
67-66-3	Chloroform	5	U
107-06-2	1,2-Dichloroethane	5	U
78-93-3	2-Butanone	5	U
71-55-6	1,1,1-Trichloroethane	10	U
56-23-5	Carbon Tetrachloride	5	U
108-05-4	Vinyl Acetate	5	U
75-27-4	Bromodichloromethane	10	U
78-87-5	1,2-Dichloropropane	5	U
10061-01-5	cis-1,3-Dichloropropene	5	U
79-01-6	Trichloroethene	5	U
124-48-1	Dibromochloromethane	5	U
79-00-5	1,1,2-Trichloroethane	5	U
71-43-2	Benzene	5	U
10061-02-6	Trans-1,3-Dichloropropene	5	U
75-25-2	Bromoform	5	U
108-10-1	4-Methyl-2-Pentanone	5	U
591-78-6	2-Hexanone	10	U
127-18-4	Tetrachloroethene	10	U
79-34-5	1,1,2,2-Tetrachloroethane	5	U
108-88-3	Toluene	5	U
108-90-7	Chlorobenzene	5	U
100-41-4	Ethylbenzene	5	U
100-42-5	Styrene	5	U
1330-20-7	Total Xylenes	5	U

FORM I VOA 1/87 Rev.

1E

VOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

BHE21

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-03

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: B9128

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. Date Analyzed: 03/11/91

Column (pack/cap) CAP Dilution Factor: 1.0

Number TICs found: 5

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1. 000000	Unknown	10.89	13	BJ
2. 000000	Unknown	15.69	6.0	BJ
3. 000000	Unknown	16.09	8.0	BJ
4. 000000	Aliphatic hydrocarbon	19.50	8.0	BJ
5. 000000	Aliphatic hydrocarbon	21.30	15	BJ

1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE22

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-04

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: B9129

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ Date Analyzed: 03/11/91

Column: (pack/cap) CAP Dilution Factor: 1.0

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NO.	COMPOUND		Q
74-87-3	Chloromethane	3	J
74-83-9	Bromomethane	2	BJ
75-01-4	Vinyl Chloride	10	U
75-00-3	Chloroethane	10	U
75-09-2	Methylene Chloride	4	BJ
67-64-1	Acetone	5	BJ
75-15-0	Carbon Disulfide	5	U
75-35-4	1,1-Dichloroethene	5	U
75-34-3	1,1-Dichloroethane	5	U
540-59-0	1,2-Dichloroethene (total)	5	U
67-66-3	Chloroform	5	U
107-06-2	1,2-Dichloroethane	5	U
78-93-3	2-Butanone	10	U
71-55-6	1,1,1-Trichloroethane	5	U
56-23-5	Carbon Tetrachloride	5	U
108-05-4	Vinyl Acetate	10	U
75-27-4	Bromodichloromethane	5	U
78-87-5	1,2-Dichloropropane	5	U
10061-01-5	cis-1,3-Dichloropropene	5	U
79-01-6	Trichloroethene	5	U
124-48-1	Dibromochloromethane	5	U
79-00-5	1,1,2-Trichloroethane	5	U
71-43-2	Benzene	5	U
10061-02-6	Trans-1,3-Dichloropropene	5	U
75-25-2	Bromoform	5	U
108-10-1	4-Methyl-2-Pentanone	10	U
591-78-6	2-Hexanone	10	U
127-18-4	Tetrachloroethene	5	U
79-34-5	1,1,2,2-Tetrachloroethane	5	U
108-88-3	Toluene	5	U
108-90-7	Chlorobenzene	5	U
100-41-4	Ethylbenzene	5	U
100-42-5	Styrene	5	U
1330-20-7	Total Xylenes	5	U

1E

VOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

BHE22

ab Name: CEIMIC CORP Contract: 68D90056

ab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

trix: (soil/water) WATER Lab Sample ID: 910128-04

mple wt/vol: 5.0 (g/mL) ML Lab File ID: B9129

vel: (low/med) LOW Date Received: 03/06/91

Moisture: not dec. ____ Date Analyzed: 03/11/91

lumn (pack/cap) CAP Dilution Factor: 1.0

mber TICs found: 3 CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1. 000000	Unknown	10.89	12	BJ
2. 000000	Unknown	15.72	6.0	BJ
3. 00000	Unknown	16.10	8.0	J

1B

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE17

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-01

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5303

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/02/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1.0

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
108-95-2	Phenol	10	U
111-44-4	bis(2-Chloroethyl)Ether	10	U
95-57-8	2-Chlorophenol	10	U
541-73-1	1,3-Dichlorobenzene	10	U
106-46-7	1,4-Dichlorobenzene	10	U
100-51-6	Benzyl Alcohol	10	U
95-50-1	1,2-Dichlorobenzene	10	U
95-48-7	2-Methylphenol	10	U
108-60-1	bis(2-Chloroisopropyl)Ether	10	U
106-44-5	4-Methylphenol	10	U J
621-64-7	N-Nitroso-Di-n-Propylamine	10	U
67-72-1	Hexachloroethane	10	U
98-95-3	Nitrobenzene	10	U
78-59-1	Isophorone	10	U
88-75-5	2-Nitrophenol	10	U
105-67-9	2,4-Dimethylphenol	10	U
65-85-0	Benzoic Acid	10	U
111-91-1	bis(2-Chloroethoxy)Methane	50	U
120-83-2	2,4-Dichlorophenol	10	U
120-82-1	1,2,4-Trichlorobenzene	10	U
91-20-3	Naphthalene	10	U
106-47-8	4-Chloroaniline	10	U
87-68-3	Hexachlorobutadiene	10	U
59-50-7	4-Chloro-3-Methylphenol	10	U
91-57-6	2-Methylnaphthalene	10	U
77-47-4	Hexachlorocyclopentadiene	10	U
88-06-2	2,4,6-Trichlorophenol	10	U
95-95-4	2,4,5-Trichlorophenol	10	U
91-58-7	2-Chloronaphthalene	50	U
88-74-4	2-Nitroaniline	10	U
131-11-3	Dimethyl Phthalate	50	U
208-96-8	Acenaphthylene	10	U
606-20-2	2,6-Dinitrotoluene	10	U

1C

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE17

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-01

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5303

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/02/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1.0

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
99-09-2	3-Nitroaniline	50	U
83-32-9	Acenaphthene	10	U
51-28-5	2,4-Dinitrophenol	50	U
100-02-7	4-Nitrophenol	50	U
132-64-9	Dibenzofuran	10	U
121-14-2	2,4-Dinitrotoluene	10	U
84-66-2	Diethylphthalate	10	U
7005-72-3	4-Chlorophenyl-phenylether	10	U
86-73-7	Fluorene	10	U
100-01-6	4-Nitroaniline	50	U
534-52-1	4,6-Dinitro-2-Methylphenol	50	U
86-30-6	N-Nitrosodiphenylamine (1)	10	U
101-55-3	4-Bromophenyl-phenylether	10	U
118-74-1	Hexachlorobenzene	10	U
87-86-5	Pentachlorophenol	50	U
85-01-8	Phenanthrene	10	U
120-12-7	Anthracene	10	U
84-74-2	Di-n-Butylphthalate	10	U
206-44-0	Fluoranthene	10	U
129-00-0	Pyrene	10	U
85-68-7	Butylbenzylphthalate	10	U
91-94-1	3,3'-Dichlorobenzidine	20	U
56-55-3	Benzo(a)Anthracene	10	U
218-01-9	Chrysene	10	U
117-81-7	bis(2-Ethylhexyl)Phthalate	10	U
117-84-0	Di-n-Octyl Phthalate	10	U
205-99-2	Benzo(b)Fluoranthene	10	U
207-08-9	Benzo(k)Fluoranthene	10	U
50-32-8	Benzo(a)Pyrene	10	U
193-39-5	Indeno(1,2,3-cd)Pyrene	10	U
53-70-3	Dibenz(a,h)Anthracene	10	U
191-24-2	Benzo(g,h,i)Perylene	10	U

(1) - Cannot be separated from Diphenylamine

FORM I SV-2 1/87 Rev.

1F

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

BHE17

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-01

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5303

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/02/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1.0

Number TICs found: 1 CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1. 000000	Unknown	11.29	9.0	JN

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1B

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE18

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-02

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5306

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/02/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1.0

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NO.	COMPOUND		Q
108-95-2	Phenol	10	U
111-44-4	bis(2-Chloroethyl)Ether	10	U
95-57-8	2-Chlorophenol	10	U
541-73-1	1,3-Dichlorobenzene	10	U
106-46-7	1,4-Dichlorobenzene	10	U
100-51-6	Benzyl Alcohol	10	U
95-50-1	1,2-Dichlorobenzene	10	U
95-48-7	2-Methylphenol	10	U
108-60-1	bis(2-Chloroisopropyl)Ether	10	U
106-44-5	4-Methylphenol	10	U J
621-64-7	N-Nitroso-Di-n-Propylamine	10	U
67-72-1	Hexachloroethane	10	U
98-95-3	Nitrobenzene	10	U
78-59-1	Isophorone	10	U
88-75-5	2-Nitrophenol	10	U
105-67-9	2,4-Dimethylphenol	10	U
65-85-0	Benzoic Acid	10	U
111-91-1	bis(2-Chloroethoxy)Methane	50	U
120-83-2	2,4-Dichlorophenol	10	U
120-82-1	1,2,4-Trichlorobenzene	10	U
91-20-3	Naphthalene	10	U
106-47-8	4-Chloroaniline	10	U
87-68-3	Hexachlorobutadiene	10	U
59-50-7	4-Chloro-3-Methylphenol	10	U
91-57-6	2-Methylnaphthalene	10	U
77-47-4	Hexachlorocyclopentadiene	10	U
88-06-2	2,4,6-Trichlorophenol	10	U
95-95-4	2,4,5-Trichlorophenol	10	U
91-58-7	2-Chloronaphthalene	50	U
88-74-4	2-Nitroaniline	10	U
131-11-3	Dimethyl Phthalate	50	U
208-96-8	Acenaphthylene	10	U
606-20-2	2,6-Dinitrotoluene	10	U
		10	U

1C

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE18

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-02

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5306

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/02/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1.0

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
99-09-2	3-Nitroaniline	50	U
83-32-9	Acenaphthene	10	U
51-28-5	2,4-Dinitrophenol	50	U
100-02-7	4-Nitrophenol	50	U
132-64-9	Dibenzofuran	10	U
121-14-2	2,4-Dinitrotoluene	10	U
84-66-2	Diethylphthalate	10	U
7005-72-3	4-Chlorophenyl-phenylether	10	U
86-73-7	Fluorene	10	U
100-01-6	4-Nitroaniline	50	U
534-52-1	4,6-Dinitro-2-Methylphenol	50	U
86-30-6	N-Nitrosodiphenylamine (1)	10	U
101-55-3	4-Bromophenyl-phenylether	10	U
118-74-1	Hexachlorobenzene	10	U
87-86-5	Pentachlorophenol	50	U
85-01-8	Phenanthrene	10	U
120-12-7	Anthracene	10	U
84-74-2	Di-n-Butylphthalate	10	U
206-44-0	Fluoranthene	10	U
129-00-0	Pyrene	10	U
85-68-7	Butylbenzylphthalate	10	U
91-94-1	3,3'-Dichlorobenzidine	20	U
56-55-3	Benzo(a)Anthracene	10	U
218-01-9	Chrysene	10	U
117-81-7	bis(2-Ethylhexyl)Phthalate	10	U
117-84-0	Di-n-Octyl Phthalate	10	U
205-99-2	Benzo(b)Fluoranthene	10	U
207-08-9	Benzo(k)Fluoranthene	10	U
50-32-8	Benzo(a)Pyrene	10	U
193-39-5	Indeno(1,2,3-cd)Pyrene	10	U
53-70-3	Dibenz(a,h)Anthracene	10	U
191-24-2	Benzo(g,h,i)Perylene	10	U

(1) - Cannot be separated from Diphenylamine

1F

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

BHE18

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-02

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5306

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/02/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1.0

Number TICs found: 1 CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1. 000000	Unknown	11.27	8.0	J|j

1B

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE21

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-03

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5347

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/04/91

GPC Cleanup: (Y/N) N pH: 8.8 Dilution Factor: 1.0

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NO.	COMPOUND		Q
108-95-2	Phenol	10	U
111-44-4	bis(2-Chloroethyl)Ether	10	U
95-57-8	2-Chlorophenol	10	U
541-73-1	1,3-Dichlorobenzene	10	U
106-46-7	1,4-Dichlorobenzene	10	U
100-51-6	Benzyl Alcohol	10	U
95-50-1	1,2-Dichlorobenzene	10	U
95-48-7	2-Methylphenol	10	U
108-60-1	bis(2-Chloroisopropyl)Ether	10	U
106-44-5	4-Methylphenol	10	U
621-64-7	N-Nitroso-Di-n-Propylamine	10	U
67-72-1	Hexachloroethane	10	U
98-95-3	Nitrobenzene	10	U
78-59-1	Isophorone	10	U
88-75-5	2-Nitrophenol	10	U
105-67-9	2,4-Dimethylphenol	10	U
65-85-0	Benzoic Acid	10	U
111-91-1	bis(2-Chloroethoxy)Methane	50	U
120-83-2	2,4-Dichlorophenol	10	U
120-82-1	1,2,4-Trichlorobenzene	10	U
91-20-3	Naphthalene	10	U
106-47-8	4-Chloroaniline	10	U
87-68-3	Hexachlorobutadiene	10	U
59-50-7	4-Chloro-3-Methylphenol	10	U
91-57-6	2-Methylnaphthalene	10	U
77-47-4	Hexachlorocyclopentadiene	10	U
88-06-2	2,4,6-Trichlorophenol	10	U
95-95-4	2,4,5-Trichlorophenol	10	U
91-58-7	2-Chloronaphthalene	50	U
88-74-4	2-Nitroaniline	10	U
131-11-3	Dimethyl Phthalate	50	U
208-96-8	Acenaphthylene	10	U
606-20-2	2,6-Dinitrotoluene	10	U

1C

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO

BHE21

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-03

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5347

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/04/91

GPC Cleanup: (Y/N) N pH: 8.8 Dilution Factor: 1.0

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
99-09-2	3-Nitroaniline	50	U
83-32-9	Acenaphthene	10	U
51-28-5	2,4-Dinitrophenol	50	U
100-02-7	4-Nitrophenol	50	U
132-64-9	Dibenzofuran	10	U
121-14-2	2,4-Dinitrotoluene	10	U
84-66-2	Diethylphthalate	10	U
7005-72-3	4-Chlorophenyl-phenylether	10	U
86-73-7	Fluorene	10	U
100-01-6	4-Nitroaniline	50	U
534-52-1	4,6-Dinitro-2-Methylphenol	50	U
86-30-6	N-Nitrosodiphenylamine (1)	10	U
101-55-3	4-Bromophenyl-phenylether	10	U
118-74-1	Hexachlorobenzene	10	U
87-86-5	Pentachlorophenol	50	U
85-01-8	Phenanthrene	10	U
120-12-7	Anthracene	10	U
84-74-2	Di-n-Butylphthalate	10	U
206-44-0	Fluoranthene	10	U
129-00-0	Pyrene	10	U
85-68-7	Butylbenzylphthalate	10	U
91-94-1	3,3'-Dichlorobenzidine	20	U
56-55-3	Benzo(a)Anthracene	10	U
218-01-9	Chrysene	10	U
117-81-7	bis(2-Ethylhexyl)Phthalate	10	U
117-84-0	Di-n-Octyl Phthalate	10	U
205-99-2	Benzo(b)Fluoranthene	10	U
207-08-9	Benzo(k)Fluoranthene	10	U
50-32-8	Benzo(a)Pyrene	10	U
193-39-5	Indeno(1,2,3-cd)Pyrene	10	U
53-70-3	Dibenz(a,h)Anthracene	10	U
191-24-2	Benzo(g,h,i)Perylene	10	U

(1) - Cannot be separated from Diphenylamine

FORM I SV-2

1/87 Rev.

1F

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

BHE21

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 16001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-03

Sample wt/vol: 1000 (g/mL) ML Lab File ID: D5347

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 04/04/91

GPC Cleanup: (Y/N) N pH: 8.8 Dilution Factor: 1.0

Number TICs found: 0

CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q

C.1237

1D

PESTICIDE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE17

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 15001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-01

Sample wt/vol: 1000 (g/mL) ML Lab File ID: _____

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 03/23/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
319-84-6	alpha-BHC	0.050	U
319-85-7	beta-BHC	0.050	U
319-86-8	delta-BHC	0.050	U
58-89-9	gamma-BHC (Lindane)	0.050	U
76-44-8	Heptachlor	0.050	U
309-00-2	Aldrin	0.050	U
1024-57-3	Heptachlor epoxide	0.050	U
959-98-8	Endosulfan I	0.050	U
60-57-1	Dieldrin	0.050	U
72-55-9	4,4'-DDE	0.10	U
72-20-8	Endrin	0.10	U
33213-65-9	Endosulfan II	0.10	U
72-54-8	4,4'-DDD	0.10	U
1031-07-8	Endosulfan sulfate	0.10	U
50-29-3	4,4'-DDT	0.10	U
72-43-5	Methoxychlor	0.10	U
53494-70-5	Endrin ketone	0.50	U
5103-71-9	alpha-Chlordane	0.10	U
5103-74-2	gamma-Chlordane	0.50	U
8001-35-2	Toxaphene	0.50	U
12674-11-2	Aroclor-1016	1.0	U
11104-28-2	Aroclor-1221	0.50	U
11141-16-5	Aroclor-1232	0.50	U
53469-21-9	Aroclor-1242	0.50	U
12672-29-6	Aroclor-1248	0.50	U
11097-69-1	Aroclor-1254	0.50	U
11096-82-5	Aroclor-1260	1.0	U

1D

PESTICIDE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE18

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 15001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-02

Sample wt/vol: 1000 (g/mL) ML Lab File ID: _____

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 03/23/91

GPC Cleanup: (Y/N) N pH: 7.7 Dilution Factor: 1

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
319-84-6	alpha-BHC	0.050	U
319-85-7	beta-BHC	0.050	U
319-86-8	delta-BHC	0.050	U
58-89-9	gamma-BHC (Lindane)	0.050	U
76-44-8	Heptachlor	0.050	U
309-00-2	Aldrin	0.050	U
1024-57-3	Heptachlor epoxide	0.050	U
959-98-8	Endosulfan I	0.050	U
60-57-1	Dieldrin	0.050	U
72-55-9	4,4'-DDE	0.10	U
72-20-8	Endrin	0.10	U
33213-65-9	Endosulfan II	0.10	U
72-54-8	4,4'-DDD	0.10	U
1031-07-8	Endosulfan sulfate	0.10	U
50-29-3	4,4'-DDT	0.10	U
72-43-5	Methoxychlor	0.10	U
53494-70-5	Endrin ketone	0.50	U
5103-71-9	alpha-Chlordane	0.10	U
5103-74-2	gamma-Chlordane	0.50	U
8001-35-2	Toxaphene	0.50	U
12674-11-2	Aroclor-1016	1.0	U
11104-28-2	Aroclor-1221	0.50	U
11141-16-5	Aroclor-1232	0.50	U
53469-21-9	Aroclor-1242	0.50	U
12672-29-6	Aroclor-1248	0.50	U
11097-69-1	Aroclor-1254	0.50	U
11096-82-5	Aroclor-1260	1.0	U
		1.0	U

1D
PESTICIDE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

BHE21

Lab Name: CEIMIC CORP Contract: 68D90056

Lab Code: CEIMIC Case No.: 15001 SAS No.: _____ SDG No.: BHE17

Matrix: (soil/water) WATER Lab Sample ID: 910128-03

Sample wt/vol: 1000 (g/mL) ML Lab File ID: _____

Level: (low/med) LOW Date Received: 03/06/91

% Moisture: not dec. ____ dec. ____ Date Extracted: 03/11/91

Extraction: (SepF/Cont/Sonc) SEPF Date Analyzed: 03/23/91

GPC Cleanup: (Y/N) N pH: 9.0 Dilution Factor: 1

CONCENTRATION UNITS:
(ug/L or ug/Kg) UG/L

CAS NO.	COMPOUND		Q
319-84-6	alpha-BHC	0.050	U
319-85-7	beta-BHC	0.050	U
319-86-8	delta-BHC	0.050	U
58-89-9	gamma-BHC (Lindane)	0.050	U
76-44-8	Heptachlor	0.050	U
309-00-2	Aldrin	0.050	U
1024-57-3	Heptachlor epoxide	0.050	U
959-98-8	Endosulfan I	0.050	U
60-57-1	Dieldrin	0.10	U
72-55-9	4,4'-DDE	0.10	U
72-20-8	Endrin	0.10	U
33213-65-9	Endosulfan II	0.10	U
72-54-8	4,4'-DDD	0.10	U
1031-07-8	Endosulfan sulfate	0.10	U
50-29-3	4,4'-DDT	0.10	U
72-43-5	Methoxychlor	0.50	U
53494-70-5	Endrin ketone	0.10	U
5103-71-9	alpha-Chlordane	0.50	U
5103-74-2	gamma-Chlordane	0.50	U
8001-35-2	Toxaphene	1.0	U
12674-11-2	Aroclor-1016	0.50	U
11104-28-2	Aroclor-1221	0.50	U
11141-16-5	Aroclor-1232	0.50	U
53469-21-9	Aroclor-1242	0.50	U
12672-29-6	Aroclor-1248	0.50	U
11097-69-1	Aroclor-1254	1.0	U
11096-82-5	Aroclor-1260	1.0	U

ATTACHMENT 1
SOP NO. HW-6

TOTAL REVIEW

CLP DATA ASSESSMENT

Functional Guidelines for Evaluating Organics Analysis

Case No. 16001 SDG No. BHE17 LABORATORY CEIMIC SITE FLORENCE

DATA ASSESSMENT:

The current functional guidelines (1988) for evaluating organic data have been applied.

All data are valid and acceptable except those analytes which have been qualified with a "J" (estimated), "U" (non-detects), "R" (unusable),or "JN" (presumptive evidence for the presence of the material at an estimated value). All action is detailed on the attached sheets.

Two facts should be noted by all data users. First, the "R" flag means that the associated value is unusable. In other words, due to significant QC problems the analysis is invalid and provides no information as to whether the compound is present or not. "R" values should not appear on data tables because they cannot be relied upon, even as a last resort. The second fact to keep in mind is that no compound concentration, even if it has passed all QC tests, is guaranteed to be accurate. Strict QC serves to increase confidence in data but any value potentially contains error.

Reviewer's Signature: [signature] Date: 5/6/1991

Verified By: Pamela Greenlaw Date: 5/7/1991

DATA ASSESSMENT:

5. CALIBRATION:

A) PERCENT RELATIVE STANDARD DEVIATION (%RSD) AND PERCENT DIFFERENCE (%D):

Percent RSD is calculated from the initial calibration and is used to indicate the stability of the specific compound response factor over increasing concentration. Percent D compares the response factor of the continuing calibration check to the mean response factor (RRF) from the initial calibration. Percent D is a measure of the instrument's daily performance. Percent RSD must be <30% and %D must be <25%. A value outside of these limits indicates potential detection and quantitation errors. For these reasons, all positive results are flagged as estimated, "J" and non-detects are flagged "UJ" (if %D or RSD >50%). If there is a gross deviation of %RSD and %D, the non-detects may be rejected ("R").

For the PCB/PESTICIDE fraction, %RSD for aldrin, endrin, DDT, and dibutylchlorendate must not exceed 10%. Percent D must be within 15% on the quantitation column and 20% on the confirmation column.

BN- bis(2chloroisopropyl) ether was flagged estimated "J" in BH-17+18 due to CCC >50%.

DATA ASSESSMENT:

2. BLANK CONTAMINATION:

Quality assurance (QA) blanks, i.e., method, trip field, rinse and water blanks are prepared to identify any contamination which may have been introduced into the samples during sample preparation or field activity. Method blanks measure laboratory contamination. Trip blanks measure cross-contamination of samples during shipment. Field blanks measure cross- contamination of samples during field operations. If the concentration of the analyte is less than 5 times the blank contaminant level (10 times for the common contaminants), the analytes are qualified as non- detects, "U". The following analytes in the samples shown were qualified with "U" for these reasons:

A) Method blank contamination

VOH - methylene chloride & acetone were flagged nondetect "U" in BHE17+18.
- bromomethane was flagged nondetect "U" in BHE18.

B) Field or rinse blank contamination ("water blanks" or "distilled water blanks" are validated like any other sample)

C) Trip blank contamination

DATA ASSESSMENT:

10. OTHER QC DATA OUT OF SPECIFICATION:

11. SYSTEM PERFORMANCE AND OVERALL ASSESSMENT (continued on next page if necessary):

12. CONTRACT PROBLEMS____NON-COMPLIANCE:

13. This package contains re-extraction, re-analysis or dilution. Upon reviewing the QA results, the following form I(s) are identified to be used.

SITE NAME: FLOWEN OIL DELAWARE VALLEY CORP.
TDD#: 02-9011-20
SAMPLING DATE: 3/5/91
EPA CASE NO.: 16001 LAB: CEIMIC

VOLATILES				
Sample ID No.	NJHV-GW1(MS/MSD)	NJHV-GW2(DUP)	NJHV-RIN1	NJHV-TBLK1
Traffic Report No.	BHE17	BHE18	BHE21	BHE22
Matrix	WATER	WATER	WATER	WATER
Units	ug/L	ug/L	ug/L	ug/L
Dilution Factor	1.0	1.0	1.0	1.0
Percent Moisture	--	--	--	--
Chloromethane			J	J
Bromomethane				B
Vinyl Chloride	J			
Chloroethane				
Methylene Chloride			B	B
Acetone				B
Carbon Disulfide				
1,1-Dichloroethene				
1,1-Dichloroethane	J	J		
Trans-1,2-Dichloroethene (total)	11	9		
Chloroform				
1,2-Dichloroethane				
2-Butanone				
1,1,1-Trichloroethane				
Carbon Tetrachloride				
Vinyl Acetate				
Bromodichloromethane				
1,2-Dichloropropane				
cis-1,3-Dichloropropene				
Trichloroethene				
Dibromochloromethane				
1,1,2-Trichloroethane				
Benzene				
trans-1,3-Dichloropropene				
Bromoform				
4-Methyl-2-Pentanone				
2-Hexanone				
Tetrachloroethene				
Toluene				
1,1,2,2-Tetrachloroethane				
Chlorobenzene				
Ethylbenzene				
Styrene				
Xylenes (Total)				

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if Dilution Factor >1 and/or percent moisture <0%

SITE NAME: FLOWEN OIL DELAWARE VALLEY CORP.
TDD#: 02-9011-20
SAMPLING DATE: 3/5/91
EPA CASE NO.: 16001 LAB: CEIMIC

SEMI-VOLATILES				
Sample ID No.	NJHV-GW1	NJHV-GW2	NJHV-RIN1	NJHV-TBLK1
Traffic Report No.	BHE17	BHE18	BHE21	BHE22
Matrix	WATER	WATER	WATER	WATER
Units	ug/L	ug/L	ug/L	ug/L
Dilution Factor/GPC Cleanup (Y)	1.0	1.0	1.0	N/A
Percent Moisture	--	--	--	N/A
Phenol				NR
bis(2-Chloroethyl)ether				NR
2-Chlorophenol				NR
1,3-Dichlorobenzene				NR
1,4-Dichlorobenzene				NR
Benzyl alcohol				NR
1,2-Dichlorobenzene				NR
2-Methylphenol				NR
bis(2-Chloroisopropyl)ether				NR
4-Methylphenol				NR
N-Nitroso-di-n-dipropylamine				NR
Hexachloroethane				NR
Nitrobenzene				NR
Isophorone				NR
2-Nitrophenol				NR
2,4-Dimethylphenol				NR
Benzoic acid				NR
bis(2-Chloroethoxy)methane				NR
2,4-Dichlorophenol				NR
1,2,4-Trichlorobenzene				NR
Naphthalene				NR
4-Chloroaniline				NR
Hexachlorobutadiene				NR
4-Chloro-3-Methylphenol				NR
2-Methylnaphthalene				NR
Hexachlorocyclopentadiene				NR
2,4,6-Trichlorophenol				NR
2,4,5-Trichlorophenol				NR
2-Chloronaphthalene				NR
2-Nitroaniline				NR
Dimethylphthalate				NR
Acenaphthylene				NR
2,6-Dinitrotoluene				NR
3-Nitroaniline				NR
Acenaphthene				NR
2,4-Dinitrophenol				NR
4-Nitrophenol				NR
Dibenzofuran				NR
2,4-Dinitrotoluene				NR
Diethylphthalate				NR
4-Chlorophenyl-phenyl ether				NR
Fluorene				NR
4-Nitroaniline				NR
4,6-Dinitro-2-methylphenol				NR
N-nitrosodiphenylamine				NR
4-Bromophenyl-phenyl ether				NR
Hexachlorobenzene				NR

SITE NAME: FLOWEN OIL DELAWARE VALLEY CORP.
TDD#: 02-9011-20
SAMPLING DATE: 3/5/91
EPA CASE NO.: 16001 LAB: CEIMIC

SEMI-VOLATILES				
Sample ID No.	NJHV-GW1	NJHV-GW2	NJHV-RIN1	NJHV-TBLK1
Traffic Report No.	BHE17	BHE18	BHE21	BHE22
Matrix	WATER	WATER	WATER	WATER
Units	ug/L	ug/L	ug/L	ug/L
Dilution Factor/GPC Cleanup (Y)	1.0	1.0	1.0	N/A
Percent Moisture	--	--	--	N/A
Pentachlorophenol				NR
Phenanthrene				NR
Anthracene				NR
Di-n-butylphthalate				NR
Fluoranthene				NR
Pyrene				NR
Butylbenzylphthalate				NR
3,3'-Dichlorobenzidine				NR
Benzo(a)anthracene				NR
Chrysene				NR
bis(2-Ethylhexyl)phthalate				NR
Di-n-octylphthalate				NR
Benzo(b)fluoranthene				NR
Benzo(k)fluoranthene				NR
Benzo(a)pyrene				NR
Indeno(1,2,3-cd)pyrene				NR
Dibenz(a,h)anthracene				NR
Benzo(g,h,i)perylene				NR

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if Dilution Factor >1 and/or percent moisture >0%

SITE NAME: FLOWEN OIL DELAWARE VALLEY CORP.
TDD#: 02-9011-20
SAMPLING DATE: 3/5/91
EPA CASE NO.: 16001 LAB: CEIMIC

PESTICIDES				
Sample ID No.	NJHV-GW1	NJHV-GW2	NJHV-RIN1	NJHV-TBLK1
Traffic Report No.	BHE17	BHE18	BHE21	BHE22
Matrix	WATER	WATER	WATER	WATER
Units	ug/L	ug/L	ug/L	ug/L
Dilution Factor/GPC Cleanup (Y)	1.0	1.0	1.0	N/A
Percent Moisture	--	--	--	N/A
alpha-BHC				NR
beta-BHC				NR
delta-BHC				NR
gamma-BHC (Lindane)				NR
Heptachlor				NR
Aldrin				NR
Heptachlor epoxide				NR
Endosulfan I				NR
Dieldrin				NR
4,4'-DDE				NR
Endrin				NR
Endosulfan II				NR
4,4'-DDD				NR
Endosulfan sulfate				NR
4,4'-DDT				NR
Methoxychlor				NR
Endrin ketone				NR
alpha-Chlordane				NR
gamma-Chlordane				NR
Toxaphene				NR
Aroclor-1016				NR
Aroclor-1221				NR
Aroclor-1232				NR
Aroclor-1242				NR
Aroclor-1248				NR
Aroclor-1254				NR
Aroclor-1260				NR

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if Dilution Factor >1 and/or percent moisture >0%

[redacted] Date: February 1989

Type of Review: Total

Date: 5-6-91

Case #: 16001

Project: Flaxen Oil

Lab Name: Ceimic

Reviewer's Initials: S

Number of Samples: 4 H_2O's

Analytes Rejected Due to Exceeding Review Criteria:

	Surrogates	Holding Time	Calibration	Contamination	ID	Other	Total # Samples	Total # Rejected/ Total # in all Samples
Acids (15)							4	0/60
B/N (50)							4	0/200
VOA (35)		~~5/3~~ (5)		5/3			4	5/140
PEST (20)							4	0/20
PCB (7)							4	0/28
TCDD (1)							0	0/0

Analytes Estimated Due to Exceeding Review Criteria for:

Acids (15)							4	0/60
B/N (50)			2/2				4	2/200
VOA (35)							4	0/140
PEST (20)							4	0/20
PCB (7)							4	0/26
TCDD (1)							0	0/0

Title: Evaluation of Metals Data for the Contract Laboratory Program
Appendix A.2: Data Assessment Narrative

Date: Feb. 1990
Number: HW-2
Revision: 10

Case# 16001 Site Flower Oil Matrix: Soil —

SDG# MBFQ14 Lab Beta Water W

Contractor FID Reviewer JB Other —

A.2.1 The case description and exceptions, if any, are noted below with reason(s) for rejection or qualification as estimated value(s) J.

① The CL used a non linear method to generate the measured concentration of calibration standards for those analytes determined by GFAAL (As, Pb, Se + Tl). Therefore linear regression could be used to determine the accuracy of the calibration results. A curve was drawn (by the validator) then the standard to demonstrate a good fit (see Attached)

- Because Pb's 40 + 80 standards were cut + those analytes that fell within the range of the bad standards were flagged est. J" in MBFQ14#15

JB 6/25/91

A.2.1 (continuation)

(2) Sodium is not expected to be found in the ICS Solution therefore it is a false positive value (≥10L) those positive assoc. samples were flagged estimated "J" MBFQ 14,15+18.

(3) The water matrix spike recovery for AS was <30% therefore those associated results for AS were rejected
AS MBFQ 14,15,18
Antimony, chromium, selenium and vanadium fell between 30-74% therefore, those assoc. results for Sb, Cr, Sa & V were flagged "J"
Sb MBFQ 14,15,+18
Cr MBFQ 14,15+18
Sa MBFQ 14,15+18
V MBFQ 14,15+18

(4) Aluminum, Cromium & Iron should be flagged est "J" in MBFQ 14,15+18 due to %RPD >50% in lab dup.
* Note: CR was prev. flagged due to matrix spike recovery statement 3.

A.2.1 (continuation)

(5) The aqueous field dup for Copper & Mercury was flagged "J" in Samples MBFQ14+15 due to difference >CRDL. + Lead in MBFQ14+15 due to RPD >50.

* Note Pb MBFQ14+15 were previously flagged as per statement 1

(6) Copper was >10% diff + >10 x IDL in Water ICP Serial Dilution therefore those analytes >10xIDL were flagged est "J"

Cu: MBFQ 14+15

* MBFQ14+15 were previously flag. due to field dup statement 5

(7) The standard addition Result for lead is <.995 in MBFQ15 therefore MBFQ15 was flagged est. "J"

*Note: Pb MBFQ15 was previously flagged as per statement 2

A.2.2 Contract-Problems/Non-Compliance

1- Dilution factors on sample MBFQ14-Pb 10x dilution and MBFQ15-Pb 20x dilution were not noted on form 1's.

MMB Reviewer: _____ Date: _____
Signature

Contractor Reviewer: [signature] Date: 5-1-91
Signature

Verified by: [signature] Date: 5-3-91

SITE NAME: FLOWEN OIL DELEWARE VALLEY CORP.
TDD#: 02-9011-20
SAMPLING DATE: 3/5/91
EPA CASE NO.: 16001
LAB NAME: BETZ

INORGANICS Sample ID No. Traffic Report No. Matrix Units	NJHV-GW1(MS/MSD) MBFQ14 WATER ug/L	NJHV-GW2(DUP) MBFQ15 WATER ug/L	NJHV-RIN1 MBFQ18 WATER ug/L	NJHV-TBLK1 N/A N/A ug/L
Aluminum	21200 E	18900 E	J	NR
Antimony				NR
Arsenic	R	R	R	NR
Barium	281	347		NR
Beryllium	6.2	8.7		NR
Cadmium	J	J		NR
Calcium	136000	134000	J	NR
Chromium	117 E	88.3 E		NR
Cobalt	J	J		NR
Copper	83.8 E	111 E	J	NR
Iron	109000 E	110000 E	J	NR
Lead	224	375		NR
Magnesium	81900	78500	J	NR
Manganese	934	1180		NR
Mercury	0.39 E	0.92 E		NR
Nickel	J	J		NR
Potassium	38500	36100		NR
Selenium				NR
Silver				NR
Sodium	45900 E	47400 E	J	NR
Thallium				NR
Vanadium	420 E	504 E		NR
Zinc	636	770	J	NR

NOTES:
Blank space - compound analyzed for but not detected
E - estimated value
J - estimated value, compound present below CRDL but above IDL
R - analysis did not pass EPA QA/QC
NR - analysis not required

U.S. EPA - CLP

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INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO.

MBFQ14

Lab Name: BETZ LABORATORIES TREVOSE Contract: 68-D9-0082

Lab Code: BETZPA Case No.: 16001 SAS No.: SDG No.: MBFQ14

Matrix (soil/water): WATER Lab Sample ID: MBFQ14

Level (low/med): LOW Date Received: 3/06/91

% Solids: 0.0

Concentration Units (ug/L or mg/kg dry weight): UG/L

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	~~2120~~0.00		*J	P
7440-36-0	Antimony	15.00	U	NJ	P
7440-38-2	Arsenic	~~9.20~~	~~B~~	N	F
7440-39-3	Barium	281.00			P
7440-41-7	Beryllium	6.20			P
7440-43-9	Cadmium	2.40	B		P
7440-70-2	Calcium	136000.00			P
7440-47-3	Chromium	117.00		N*J	P
7440-48-4	Cobalt	29.30	B		P
7440-50-8	Copper	83.80		J	P
7439-89-6	Iron	109000.00		*J	P
7439-92-1	Lead	224.00		J	F
7439-95-4	Magnesium	81900.00			P
7439-96-5	Manganese	934.00			P
7439-97-6	Mercury	.39		J	CV
7440-02-0	Nickel	36.90	B		P
7440-09-7	Potassium	38500.00			P
7782-49-2	Selenium	1.00	U	NJ	F
7440-22-4	Silver	4.00	U		P
7440-23-5	Sodium	45900.00		J	P
7440-28-0	Thallium	1.00	U		F
7440-62-2	Vanadium	420.00		N*J	P
7440-66-6	Zinc	636.00			P
	Cyanide				NR

Color Before: YELLOW Clarity Before: CLEAR Texture:

Color After: YELLOW Clarity After: CLEAR Artifacts:

Comments:

Pt -10x dilution

FORM I - IN 7/88

U.S. EPA - CLP

1

INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO.

MBFQ15

Lab Name: BETZ LABORATORIES TREVOSE Contract: 68-D9-0082

Lab Code: BETZPA Case No.: 16001 SAS No.: SDG No.: MBFQ14

Matrix (soil/water): WATER Lab Sample ID: MBFQ15

Level (low/med): LOW Date Received: 3/06/91

% Solids: 0.0

Concentration Units (ug/L or mg/kg dry weight): UG/L

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	18900.00		*J	P
7440-36-0	Antimony	15.00	U	N J	P
7440-38-2	Arsenic	~~9.30~~	~~B~~	N	F
7440-39-3	Barium	347.00			P
7440-41-7	Beryllium	8.70			P
7440-43-9	Cadmium	3.90	B		P
7440-70-2	Calcium	134000.00			P
7440-47-3	Chromium	88.30		N*J	P
7440-48-4	Cobalt	31.50	B		P
7440-50-8	Copper	111.00		J	P
7439-89-6	Iron	110000.00		*J	P
7439-92-1	Lead	375.00		+J	F
7439-95-4	Magnesium	78500.00			P
7439-96-5	Manganese	1180.00			P
7439-97-6	Mercury	.92		J	CV
7440-02-0	Nickel	38.40	B		P
7440-09-7	Potassium	36100.00			P
7782-49-2	Selenium	1.00	U	WNJ	F
7440-22-4	Silver	4.00	U		P
7440-23-5	Sodium	47400.00		J	P
7440-28-0	Thallium	1.00	U	W	F
7440-62-2	Vanadium	504.00		N*J	P
7440-66-6	Zinc	770.00			P
	Cyanide				NR

Color Before: YELLOW Clarity Before: CLEAR Texture:

Color After: YELLOW Clarity After: CLEAR Artifacts:

Comments:

FORM I - IN 7/88

U.S. EPA - CLP

1

INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO.

MBFQ18

Lab Name: BETZ LABORATORIES TREVOSE Contract: 68-D9-0082

Lab Code: BETZPA Case No.: 16001 SAS No.: SDG No.: MBFQ14

Matrix (soil/water): WATER Lab Sample ID: MBFQ18

Level (low/med): LOW Date Received: 3/06/91

% Solids: 0.0

Concentration Units (ug/L or mg/kg dry weight): UG/L

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	35.50	B	~~*J~~	P
7440-36-0	Antimony	15.00	U	N J	P
7440-38-2	Arsenic	~~1.00~~	~~U~~	N	F
7440-39-3	Barium	2.00	U		P
7440-41-7	Beryllium	1.00	U		P
7440-43-9	Cadmium	2.00	U		P
7440-70-2	Calcium	144.00	B		P
7440-47-3	Chromium	6.00	U	N*J	P
7440-48-4	Cobalt	3.00	U		P
7440-50-8	Copper	3.40	B		P
7439-89-6	Iron	52.20	B	*J	P
7439-92-1	Lead	1.00	U		F
7439-95-4	Magnesium	84.20	B		P
7439-96-5	Manganese	2.00	U		P
7439-97-6	Mercury	.20	U		CV
7440-02-0	Nickel	9.00	U		P
7440-09-7	Potassium	474.00	U		P
7782-49-2	Selenium	1.00	U	N J	F
7440-22-4	Silver	4.00	U		P
7440-23-5	Sodium	113.00	B	J	P
7440-28-0	Thallium	1.00	U		F
7440-62-2	Vanadium	3.00	U	N*J	P
7440-66-6	Zinc	14.10	B		P
	Cyanide				NR

Color Before: COLORLESS Clarity Before: CLEAR Texture:

Color After: COLORLESS Clarity After: CLEAR Artifacts:

Comments:

FORM I - IN 7/88

CASE 16001 NARRATIVE

SDG MEF014

04/05/91

1) Calibration standards are prepared daily at Betz Labs, in accordance with our Standard Operating Procedures.

2) A new ICSA has been put into effect. The lot number is 0590. The Zn level and Mn levels are 216 and 34 ppb respectively.

3) New instrumentation has been put into effect as of 12/18/90. The instrument is the TJA-61E-7009. Detection limits have been appropriately filed. For this SDG, two ICP runs were run. The run of 3/21/91 was good for all elements. A second run on 4/01/91 was done for the Sb, Cr, and V post-digestion spikes.

4) The apparent CCV and CCB timing errors on run logs 14AF and 14AL are due to switching between MSA and normal analytical modes on the AA. MSA requires only a single burn. CCV and CCB QC samples require duplicate burns resulting in twice as much time per sample. The analyst must intervene between samples and QC solutions to change the instrument from MSA to spike mode of operation. This reults in a small time delay.

Gary J. Kralik

Project Manager

U. S. EPA - CLP

COVER PAGE - INORGANIC ANALYSIS DATA PACKAGE

Lab Name: BETZ LABORATORIES TREVOSE Contract: 68-D9-0082

Lab Code: BETZPA Case No.: 16001 SAS No.: SDG No.: MBFQ14

SOW No.: 7/88

EPA Sample No.	Lab Sample ID
MBFQ14	MBFQ14
MBFQ14D	MBFQ14D
MBFQ14S	MBFQ14S
MBFQ15	MBFQ15
MBFQ18	MBFQ18

Were ICP interelement corrections applied?	Yes/No	YES
Were ICP background corrections applied?	Yes/No	YES
If yes, were raw data generated before application of background corrections?	Yes/No	YES

Comments:

I certify that this data package is in compliance with the terms and conditions of the contract, both technically and for completeness, for other than the conditions detailed above. Release of the data contained in this hardcopy data package and in the computer-readable data submitted on floppy diskette has been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signatures.

Signature: Gary J Kralik Name: Gary J. Kralik

Date: 4/05/91 Title: Technical Manager

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