The Passaic River Study Area

United States Environmental Protection Agency, Region II

Status of PRP Search and Issuance of Notice Letters

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For Chemical Land Holdings, Inc., on behalf of Occidental Chemical Corporation (successor to Diamond Shamrock Chemicals Company, f/k/a Diamond Alkali Company)

February, 2001

DAL:281196.1

Tab	PRP Name	Document(s): Summary
5	**Sequa Corporation**	
A		July 26, 2000 New Jersey Department of the Treasury, Division of Revenue Status Report for Sequa Corporation indicating Sun Chemical as previous name.
B		Excerpt from 1978 "City of Newark Feasibility Study - Pollution Abatement Program." Documents malfunctioning regulator and CSO which allowed both dry and wet weather overflows from the Roanoke Avenue CSO.
C		Graphical depiction of Sun Chemical discharge mechanism. Illustrates Sun Chemical discharge route via Roanoke Ave. CSO outfall; documents "highly polluting" discharges to river.
		(*See also* the Sun Chemical information located in: The Passaic River Study Area, United States Environmental Protection Agency, Region II, Status of PRP Search and Issuance Notice Letters, February, 2001.)

GENERATOR: Sequa Corporation [f/k/a Sun Chemical Corporation ("Sun 1")]

EVIDENCE SUMMARY SHEET

(By shipment/disposal or collective group(s) of shipments/disposals)

Current Name, Mailing Address, and Telephone:

Sequa Corporation
200 Park Avenue
New York, NY 10166
[Telephone: 212-986-5500]

References:
NJ Dep't. of Treasury records; shows prior corporate name was Sun Chemical Corporation.

Facility location: 185 Foundry Street, Newark. See attached Site Location Map showing facility location in proximity to the Passaic River.

Date or time period of shipment(s) or disposal(s):

Direct/Indirect Discharges: 1967-1986 -- Plant waste effluent through the Roanoke Avenue CSO, through the permanently malfunctioning Avenue P regulator, to the Passaic River (same rationale as for EPA's having issued PRP Notice letters prior to DuPont, Reilly, and Ashland).

PVSC documents regarding Avenue P regulator; PVSC Annual Reports 1972-1974*.

Transporter: City of Newark and/or PVSC – to the extent of contaminated discharges carried through Roanoke Avenue line, through Avenue P regulator directly to the Passaic River.

PVSC documents.

Volume or quantity: Not susceptible to precise calculation due to irregular and intermittent nature of discharges. However, the same types of substances known to be at the Subject's facility have been detected at significant levels in Passaic River sediments near the Subject's facility.

Above references; Sediment data previously submitted to USEPA.*

Name of Hazardous Substance(s) [and RCRA waste codes, if applicable] (See 40 CFR Sec. 302.4):

PCBs, Class III dioxin precursor [1,2,4 trichlorobenzene], Chromium, Copper, Lead, Nickel, Zinc, Cyanide, Phenols [U188], Benzene [U109], Bis (2-ethylhexyl) phthalate [U028], 2-Butanone [U159], Di-n-butylphthalate [U069], Methylene Chloride [U080], Napthalene [U165], Toluene [U220], Xylenes [U239].

ECRA sampling (post 1986); PVSC 1980 Sewer Connection Application; 1976 Waste Effluent Survey.*

Substances like the generator's that are found in the Passaic River:

Many of the above were detected at significant levels in sediments in the vicinity of the Subject's facility. Analyses were not done for some.

Sediment data previously submitted to USEPA.*

Name, Mailing Address and Telephone of Registered Agent:

Delaware:
CT Corporation System
209 Orange Street
Wilmington, DE 19801

New Jersey:
CT Corporation System
820 Bear Tavern Road
West Trenton, NJ 08628

NJ Dep't. of Treasury records.

* *See* "Sun Chemical Corporation (Sun 2)" reference materials section.

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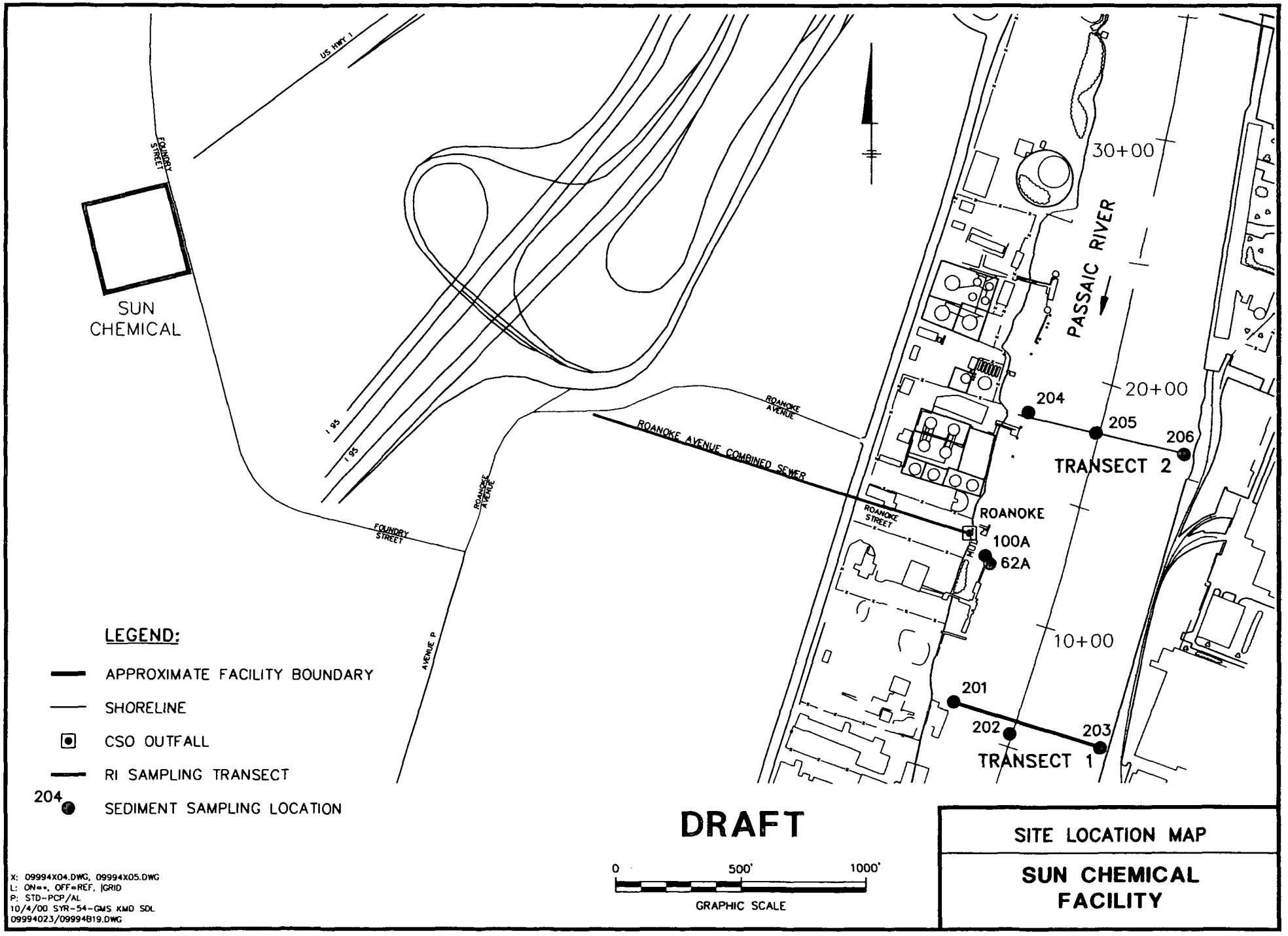
US HWY 1
FOUNDRY STREET
SUN CHEMICAL
I 95
I 95
ROANOKE AVENUE
ROANOKE AVENUE COMBINED SEWER
ROANOKE AVENUE
FOUNDRY STREET
AVENUE P
ROANOKE STREET
ROANOKE
100A
62A
PASSAIC RIVER
30+00
20+00
10+00
204
205
206
TRANSECT 2
201
202
203
TRANSECT 1
LEGEND:
APPROXIMATE FACILITY BOUNDARY
SHORELINE
CSO OUTFALL
RI SAMPLING TRANSECT
204
SEDIMENT SAMPLING LOCATION
DRAFT
0
500'
1000'
GRAPHIC SCALE
X: 09994X04.DWG, 09994X05.DWG
L: ON=*, OFF=REF, |GRID
P: STD-PCP/AL
10/4/00 SYR-54-GMS KMD SDL
09994023/09994B19.DWG
SITE LOCATION MAP
SUN CHEMICAL FACILITY

A

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SEQUA CORPORATION

TAB A

July 26, 2000 New Jersey Department of the Treasury, Division of Revenue Status Report for Sequa Corporation indicating Sun Chemical as previous name.

New Jersey Department of the Treasury, Division of Revenue

Status Report For:

Business Name	Business ID Number	Transaction Number, Seq	Report Date
SEQUA CORPORATION	8680801000	111040 : 1	7/26/2000

Business Type:	FOREIGN PROFIT CORPORATION
Status:	ACTIVE

Filing Date:	05/07/1929	**Home Jurisdiction:**	DE
Status Change Date (If dissolved, withdrawn or canceled):		**Stock Amount:**	0
DOR Suspension Start Date:		**DOR Suspension End Date:**	
Tax Suspension Start Date:		**Tax Suspension End Date:**	
Annual Report Month:	4	**Last Annual Report Filed:** **For Last AR Paid Year:**	05/18/1999 1999

Incorporator:	
Agent:	THE CORPORATION TRUST COMPANY
Agent Address:	820 BEAR TAVERN ROAD TRENTON, NJ 08628 0000
Office Address Status:	Deliverable

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Main Business Address:	200 PARK AVENUE NEW YORK, NY 10166
Principal Business Address:	3 UNIVERSITY PLAZA HACKENSACK, NJ 07601

Associated Names:

Name	Type Description
SUN CHEMICAL CORPORATION	PREVIOUS NAME

Next Status Report | Order Additional Business Information

Session Account Status | Transaction Detail Report

Home Page | Done

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B

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SEQUA CORPORATION

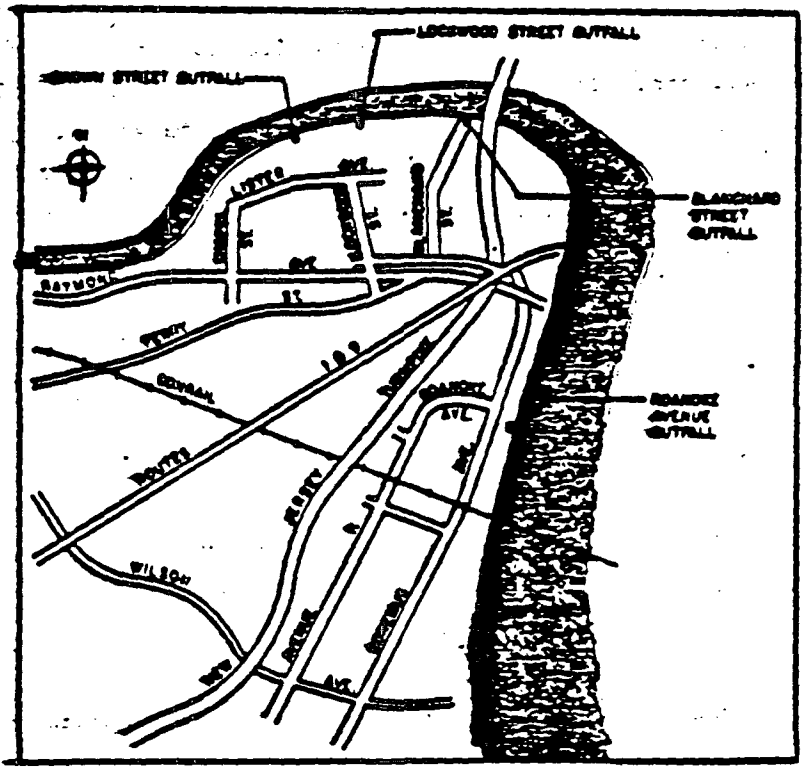
TAB B

Excerpt from 1978 "City of Newark Feasibility Study - Pollution Abatement Program." Documents malfunctioning regulator and CSO which allowed both dry and wet weather overflows from the Roanoke Avenue CSO.

City of Newark, New Jersey

Feasibility Study

POLLUTION ABATEMENT PROGRAM



Clinton Bogert Associates
Consulting Engineers
September, 1973
Revised January, 1979

932690012

I. Introduction

[redacted] and the Blanchard Street and the Lockwood Street storm sewers, and intermittent discharges from the Brown Street sewer. [redacted] only non-polluted water from the Blanchard Street, Lockwood Street, and Brown Street storm sewers, however, high levels of pollutants have been detected in the dry weather discharges at all four locations. The following ranges of pollutant concentrations and pH have been reported by the Passaic Valley Sewerage Commissioners (PVSC) during the last two-years.

	Pollutant Concentration (ppm)			
Location	TSS	COD	BOD	pH
Roanoke Avenue	5-1428	116-15600	102-6300	2.0-7.3
Blanchard Street	5-1070	51-2815	7-420	1.9-8.2
Lockwood Street	16-3148	119-3408	8-840	3.3-9.2
Brown Street	7-93	42-352	16-135	6.2-9.8

[redacted]. Illegal connections, surface chemical spillage and contaminated groundwater are the sources of pollutants detected in the three storm sewers.

Water from the Passaic River may enter all four sewers with the incoming tide and dilute the pollutant concentration. The pollutants may also be carried upstream of their entering points. Polluted flow from the sewer increases in rate with the falling tide. The highest

1. [illegible]

pollutant concentration and flow rates can be expected at low tide. During this study, samples were obtained within the three storm sewers systems at or near the times of low tide. The analytical test results of these samples are included in Appendix A.

B. Physical Inspection Findings

(1) Avenue "P" Regulator and Roanoke Outfall Sewer

[redacted] There is no visible evidence of chemical attack or deterioration of the concrete regulator structure. [redacted] A wooden overflow weir, provided in the diversion chamber, is intact. This weir does not cause the upstream pipe to surcharge above the crown in dry weather. It does reduce upstream flow velocity and causes sedimentation. About 0.5 feet of primarily granular sediment was found in the combined sewer above the regulator. [redacted] Tests of wet weather flows in other areas indicate the flushing of such solids is accompanied by a large increase in BOD. High tides cause backup, reduce velocities, and cause sediment accumulation in the Roanoke Avenue outfall during dry weather. Some of this material may be carried away by the flow at low tide and some is scoured out by wet weather flows. About 0.2 feet of primarily granular sediment was found in the outfall sewer downstream of the Avenue "P" regulator. The size of this sewer changes to 60-inch at a manhole on the easterly side of Doremus Avenue. Remnants of the brick dam, used to divert flow into the Roanoke Avenue regulator, were observed in this manhole. There are two tide gate chambers in the 60-inch outfall. Both tide gates can swing open but neither can close completely because of sediment. No deterioration of the concrete was visible in [redacted]

the tide gate chambers. A lump of bituminous material is partially blocking the discharge of the 60-inch outfall.

(2) Roanoke Avenue Sanitary Sewer

The 24-inch Roanoke Avenue sanitary sewer does not receive any flow at its upstream end because of the previously described blockage in the Avenue "P" regulator gate chamber. The manhole in the 24-inch sanitary sewer immediately downstream of the regulator contains over two feet of dry sediment. The sewer receives flow from the Pitt Consol Chemical Company downstream of that manhole. About 0.5 feet of a black, tar-like sediment was found in the sewer downstream of the Pitt Consol connections. The same black material was observed on the ground surface at the Pitt Consol plant. This material was not evident upstream of the Avenue "P" regulator or in the Roanoke Avenue outfall. Its source is evidently Pitt Consol. Sampling and analysis done jointly by the PVSC laboratory and Pitt Consol also detected chemicals used at the plant in the Roanoke Avenue outfall. However, no connections from Pitt Consol were found in the outfall. Spillage appears to have contaminated the groundwater and some appears to be leaking into the outfall. Groundwater pollution may also be leaking directly into Newark Bay. Groundwater pollution was not investigated since it was outside the scope of this study.

(3) Doremus Avenue Interceptor

The Doremus Avenue interceptor receives flow from the Roanoke Avenue sanitary sewer. Severe sedimentation was noted in this line. The first four lengths of 24-inch pipe upstream from Wilson Avenue (D-1 to D-5) were constructed on a reverse grade and the fifth length (D-5 to D-6) laid flat. The invert at Wilson Avenue is 1.2 feet higher than the low point where the minimum flow depth is greater than half pipe. Further upstream the sewer size changes from 24-inch to 22-inch and then to 20-inch in diameter. Sediment depth in the

C

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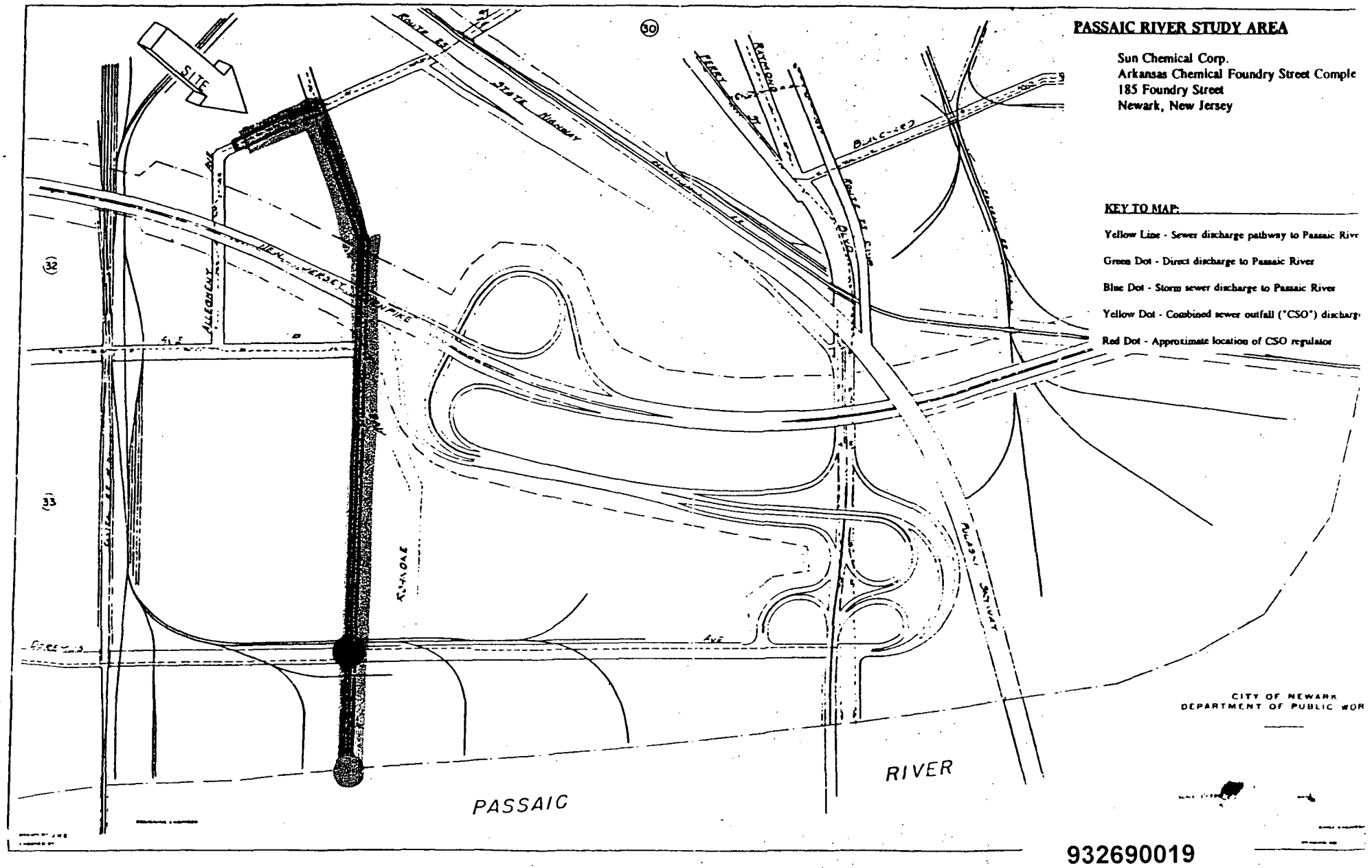
SEQUA CORPORATION

TAB C

Graphical depiction of Sun Chemical discharge mechanism. Illustrates Sun Chemical discharge route via Roanoke Ave. CSO outfall; documents "highly polluting" discharge to river.



PASSAIC RIVER STUDY AREA

Sun Chemical Corp.
Arkansas Chemical Foundry Street Comple
185 Foundry Street
Newark, New Jersey

KEY TO MAP:

Yellow Line - Sewer discharge pathway to Passaic Rive

Green Dot - Direct discharge to Passaic River

Blue Dot - Storm sewer discharge to Passaic River

Yellow Dot - Combined sewer outfall ("CSO") discharg

Red Dot - Approximate location of CSO regulator

932690019

10/23/78 Letter from PVSC re discharge from the Sun Chemical facility

- Documents "highly polluting" discharge from Sun Chemical to the Passaic River

DAL02:71890.1

PASSAIC VALLEY SEWERAGE COMMISSIONERS
600 WILSON AVENUE
NEWARK, N.J. 07105
(201) 344-1800

October 23, 1978

Mr. [redacted] Lynch, Manager
Passaic - Hackensack Region
100 Raymond Blvd.
Newark, New Jersey 07102

Dear Mr. Lynch:

On Friday, October 13, you called me at 3:50 P.M. to inform me of a complaint of [redacted] the Turnpike Bridge and Doremus Avenue. I investigated this pollution personally and also alerted Mr. Frank Cupo, Superintendent of River Inspection, and found that whatever had caused this pollution had ceased. [redacted]

I had called you on Monday, October 16, to give you a report of our findings and also told you that we would continue our investigation. [redacted] This company produces a deep red organic pigment which is not water soluble but dispersible. Upon standing in a jar, it rises and floats on top of the water. This would account for its being visible on the surface of the Passaic River.

[redacted]

932690021

Arkansas Co. Inc. is a chemical company next door to Sun Chemical and uses the same concrete channel for its wastes. A sample taken from their line was also polluting in COD, TOC and had a pH 3.4. This sample was an opaque white.

Both of these companies were advised that they were in violation not only of polluting the Passaic River, but that their low pH discharge was illegal even in a sanitary sewer. At Sun Chemical we spoke with Ralph Jaffe, Production Chemist, and at Arkansas Company we spoke with Chief Chemist, Herman Weiland.

Very truly yours,

Alexander S. Goldberg

ASG:dhb

cc: T. Perrapato
R. Ricci
E. Moller
F. Cupo

Sun Chemical Effluent Neutralization and pH Control Report, 06/04/79

- Documents that all of Sun Chemical's production effluent was discharged to the PVSC system

DAL02:71890.1

INTEROFFICE CORRESPONDENCE

SUN CHEMICAL CORPORATION

TO	R. Marino	FROM	D. Ganguly
LOCATION	Rosebank	LOCATION	Rosebank
ANSWERING		DATE	June 4, 1979

SUBJECT Effluent Neutralization & PH Control System - Newark

116-962

[redacted] Five separate pipelines will be used to direct the effluents to the neutralization tanks. The plant effluent flow rate averages at 60 gpm with peaks at the range 80-90 gpm.

Two neutralization tanks will be installed in series (as a cascade system) with one agitator on each tank. The instrumentation will be handled directly with two independent control loops. The first loop will have Immersion pH electrodes situated on the treatment tank so that when a highly acidic situation is sensed through the pH probes, the reagent (alkaline solution: caustic soda) can be added in the first tank through caustic valve. The second loop will have an Immersion pH electrode assembly mounted on outlet of tank #1. This Immersion assembly will check the first loop to make sure the acid was neutralized and if not, will operate a caustic valve approximately half the size of the first valve to add caustic to the second tank. [redacted]

2-pen pH recorder will record the pH of the plant effluent before and after neutralization respectively.

cc: R. Munoz
R. Nanes
R. Riglian
R. Jaffe