Vista Chemical Company

900 Threadneedle
Houston, Texas 77079
(713) 588-3000

P.O. Box 19029
Houston, Texas 77224
Fax (713) 588-3236

CERTIFIED MAIL RETURN RECEIPT REQUESTED

August 6, 1991

TGG: JCL: ~~EGJ~~: AC: AJO: RF VISTA

XF:

Mr. Robert M. Akin
Vice President-Petro Chemicals
E. I. Dupont de Nemours & Company
1007 Market Street, Suite N6404
Wilmington, Delaware 19898

Mr. C. H. Lee
Executive Vice President
Refining, Marketing, Supply & Transportation
Conoco, Inc.
P. O. Box 2197
Houston, TX 77252

Gentlemen:

Pursuant to §15.1 and §12.5 of the Asset Purchase Agreement letters dated July 20, 1984, between E. I. Dupont De Nemours & Company, Conoco, Inc., and Vista Chemical Company (Vista), we hereby provide notice of recently-discovered information that may lead to the filing of an Environmental Claim.

Vista has received inquiries from USEPA regarding our potential involvement in the White Chemical Superfund Site in Newark, New Jersey. The initial inquiry was addressed to Vista Chemical and was, in our judgement, in reference only to Vista Chemical product shipments to White Chemical (Attachment 1). However on July 29 we received a Request for Information from EPA that included a time period from 1982 to September, 1990 (Attachment 2). It is for this reason that we are notifying you of this action. For your information, at this time we believe we have made only one drum quantity sale of ALFOL® 6 Alcohol to White.

Sincerely,

Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

dlj

Attachment

cc: L. L. Zimmerman
J. Christopher-Conoco

VVV 000007442

Attachment 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

June 21, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUEST

Vista Chemical company
9794918-00
PO Box 75422
Charlotte, NC 75422

Re: White Chemical Corporation Superfund Site
Newark, Essex County, New Jersey

Dear Sir/Madam:

The United States Environmental Protection Agency (EPA) is charged with responding to the release or threatened release of hazardous substances into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. Section 9601 et seq. EPA has documented the release or threatened release of hazardous substances, pollutants, or contaminants into the environment at the White Chemical Corporation Site (Site) located at 660 Frelinghuysen Avenue, Newark, New Jersey. EPA has spent, and is considering spending additional public funds on actions to investigate and control such releases or threatened releases at the Site.

This letter constitutes official notification to you that EPA may conduct or require potentially responsible parties (PRPs) to conduct remedial action, as defined in the National Contingency Plan, 40 C.F.R. Part 300, at the White Chemical Corporation Superfund Site. This letter is also to advise you that EPA has in its possession information which may lead to your company being designated as a PRP for the White Chemical Corporation Site. Enclosed is a list of other companies that have been identified by EPA to date, which may also be designated as PRPs.

PRPs under CERCLA include current to former owners and operators on the Site as well as persons who arranged for disposal or treatment of hazardous substances sent to the Site, or persons who accepted hazardous substances for transport to the Site.

PRPs may be liable for any costs incurred by the government in responding to any release or threatened release at the Site. Such response actions and costs may include, but not be limited to, expenditures for conducting a focused feasibility study (FFS), an early remedial response action, and other future investigations, planning, response, oversight, and enforcement activities. In addition, PRPs may be required to pay for damages for injury to, destruction of, or loss of natural resources, including the cost of assessing damages.

In preparation for these response activities, EPA has prepared a Proposed Plan for an early remedial response action at the Site. A copy of the Proposed Plan is enclosed. The Plan is based primarily upon the FFS for the Site performed by EPA and presents a summary of the remedial alternatives developed for the White Chemical Corporation Site and a preliminary selection of a preferred remedial alternative.

Before making a final selection of a remedial alternative, EPA will evaluate public comments regarding the Proposed Plan. The public comment period ends on July 22, 1991, therefore, please submit any comments on or before this date. After that time, EPA plans to select a remedy for the Site. Comments should be addressed to:

Ms. Silvina Fonseca
Remedial Project Manager
U.S. Environmental Protection Agency - Region II
26 Federal Plaza, Room 711
New York, New York 10278

If there are any questions on this matter, please contact Bruce Aber, Esq., of the Office of Regional Counsel at (212) 264-5547.

Sincerely yours,

John S. Frisco

for Kathleen C. Callahan, Director
Emergency and Remedial Response Division

Enclosure

C-14 alcohol

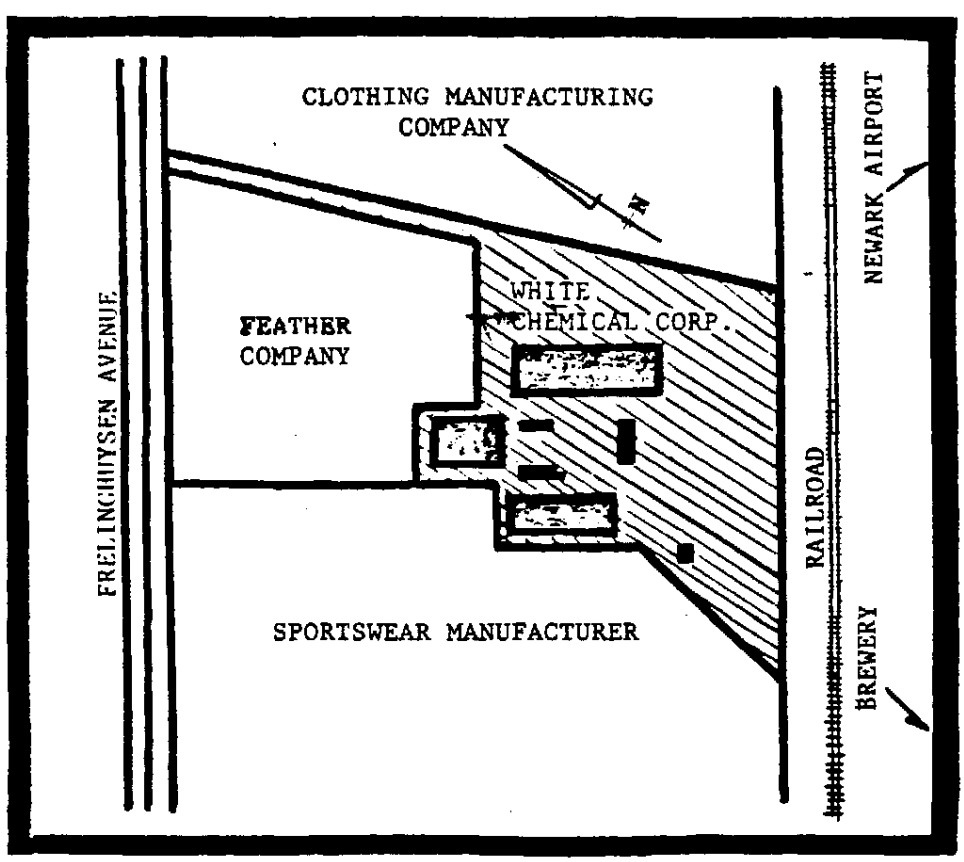
Laurie Campbell
Rick Johnson / Saddlebrook Sales Office Fortier

PROPOSED PLAN
WHITE CHEMICAL CORPORATION SITE

PURPOSE OF PROPOSED PLAN

This document describes the Proposed Plan developed by the U.S. Environmental Protection Agency (EPA), in conjunction with the New Jersey Department of Environmental Protection (NJDEP), for the remediation of surface contamination at the White Chemical Corporation Superfund site. It also outlines all of the remedial alternatives evaluated for the site and presents the rationale used to make a preliminary selection.

The preferred alternative is based on one key document: the Focused Feasibility Study (FFS) report, which characterizes the site and describes the nature and extent of the contamination present, and describes how the various remedial alternatives were developed and evaluated. The remedy proposed in this document is an early remedial response which addresses the surface contamination on the site.



VVV 000007445

This Proposed Plan is being distributed as required by Section 117 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), along with the draft FFS report, to solicit public comment regarding the most acceptable way to clean up the surficial contamination found at the White Chemical Corporation site. Detailed information on any of the material included in the Proposed Plan may be found in the FFS report. This report has been placed at an information repository located at the Newark Public Library, 5 Washington Street, Newark, New Jersey.

Additional documentation regarding the proposed remedy is available in the administrative record for the site. A copy of the administrative record, as assembled to date, is located at the Newark Public Library. It is also available at EPA's regional office at 26 Federal Plaza in New York.

COMMUNITY ROLE IN THE SELECTION PROCESS

EPA relies on public input to ensure that the remedy selected for each Superfund site is fully understood and that the agency has considered the concerns of the local community prior to selecting the final remedy, as well as ensuring that the selected remedy provides an effective solution.

This Proposed Plan and the FFS report are being made available to the public during the public comment period. Written comments on the Proposed Plan or the FFS report will be welcomed through July 22, 1991, and, if received by that date, will be considered in the Record of Decision (ROD) which will formally document the selected remedy. All written comments should be addressed to:

Ms. Silvina Fonseca
Remedial Project Manager
U.S. Environmental Protection Agency - Region II
26 Federal Plaza - Room 711
New York, New York 10278

The final remedy selection will be documented in the ROD only after consideration of all comments on the FFS report and any of the remedial alternatives addressed in the Proposed Plan. A public meeting has been scheduled for 7:00 p.m. on July 11, 1991 at the Senior Citizen Complex located at 130 Dayton Street, Newark, New Jersey, to present both the findings of the FFS report and the Proposed Plan, and to solicit comments on these documents.

SITE BACKGROUND

The White Chemical Corporation site is a 4.4-acre, inactive facility that formerly manufactured acid chlorides and flame retardant compounds. The site is located at 660 Frelinghuysen Avenue in a heavily populated and industrialized area of Newark, Essex County, New Jersey.

The site is located immediately east of two large manufacturing facilities; a feather company and a sportswear manufacturer. A large clothing manufacturing company is located north of the site. The eastern border of the site is adjacent to the Conrail railroad line, a major rail corridor to New York City. The Newark brewery of Anheuser-Busch, Inc., is located on the far side of the railroad line. Approximately one-half mile further east are U.S. Highways 1 and 9, and Newark International Airport. Weequahic Park, several large housing complexes and several high-rise senior citizen homes are present near the site. There is a daytime population of approximately 12,000 within a one-quarter mile radius of the site.

In September 1970, Central Services Corporation (CSC) purchased the property on which the site is located from the Union Carbide Corporation. It is believed that much of the present site infrastructure, including sewer and utility conduits and buildings, may date from the time of Union Carbide's ownership. CSC sold the property to the Lancaster Chemical Company, a division of AZS Corporation, in August 1975. In 1983, the White Chemical Corporation (WCC) moved its operations from Bayonne, New Jersey, to the present site in Newark. WCC ceased operation in July 1990.

Five major buildings are located on the site, as well as three smaller, facility support buildings. Tanks are present in three areas of the property, and 55-gallon drums are located primarily in an area east of the buildings. The site is secured by a chain-link fence that was installed by EPA in 1990. In addition, EPA is maintaining 24-hour security at the site.

NJDEP conducted several inspections of the facility between June and September 1989 pursuant to the Resource Conservation and Recovery Act (RCRA). During these inspections NJDEP issued Notices of Violation (NOVs) for improper drum management, leaking drums, open containers, and inadequate aisle space.

On September 22, 1989 the site was reinspected and it was noted that the facility had attained only partial compliance. As a result, an Administrative Order and penalty was issued by NJDEP on March 15, 1990. According to NJDEP, WCC never complied with the order and never paid the penalty.

From March 27 through March 29, 1990, NJDEP reinspected the facility and again found many RCRA violations. As a result, NJDEP issued NOVs under the New Jersey Spill Compensation and Control Act and ordered WCC to immediately remediate all spills and other violations. WCC never complied with the NOVs.

On May 8, 1990, NJDEP issued a Directive to WCC pursuant to the New Jersey Spill Compensation and Control Act, in order to secure the perimeter of the facility, provide 24-hour security and attempt to stabilize drums located on the premises. WCC never responded to the Directive.

In early 1990, NJDEP issued Directives to WCC to clean up the site. No response to the Directives was received. Consequently, on May 15, 1990, NJDEP initiated a removal action, under the New Jersey Spill Compensation and Control Act. However, after removing approximately 1,000 drums, NJDEP reached its project ceiling of $825,000 and was forced to suspend operations in August 1990. As a result, on August 24, NJDEP requested that EPA consider taking a removal action at the site.

On September 7, 1990, EPA performed a preliminary assessment of the White Chemical facility and found numerous air- and water- reactive materials in 55-gallon drums. These materials were releasing acid gases into the ambient air. At that time, EPA overpacked 11 of the drums and secured them for future handling. During this assessment, numerous RCRA violations were discovered.

On September 28, the Agency for Toxic Substances and Disease Registry (ATSDR) issued a health consultation that concluded that the site poses an imminent and substantial health and safety threat to nearby residents and workers. A Public Health Advisory was later issued in November 1990.

EPA performed supplementary assessments on October 2 and 4, 1990 which included the laboratory located on the site. The laboratory, which consists of several rooms, contained flammable liquids, corrosives, acids, oxidizers, shock-sensitive materials, and air- and water- reactive materials. In December 1990, a room containing a large volume of explosive material was found, along with a pallet of shock-sensitive material.

Removal actions currently in progress include drum overpacking on an emergency basis, segregating incompatible substances, and further assessing the nature of the chemicals present. Approximately 12,000 laboratory containers have been restaged and inventoried, however, the results of the inventory have not yet been compiled.

Based on the known contamination present, EPA proposed the White Chemical Corporation site for inclusion on the National Priorities List (NPL) of Superfund sites on May 9, 1991. Recognizing the nature and complexity of the site, EPA is

undertaking a multi-tiered approach to addressing the contamination problems at the site, which includes a removal action, an early remedial response, and a long-term remedial action.

FIELD INVESTIGATION SUMMARY

The objectives of the field investigation for the early remedial response were to identify and characterize the potential sources of contamination, and to gather data to evaluate remedial alternatives. Because of the large number of containers present at the site, a complete inventory of the drums, tanks and laboratory containers has not been assembled. Much of the information gathered about the contaminants on the site is based on data from White Chemical's 1989 SARA Title III Survey, corporation records available to date, and information developed during the implementation of the removal action.

The field investigation indicated that, subsequent to the NJDEP removal action and the removal of empty drums, approximately 10,900 drums of hazardous materials remained improperly stored and precariously stacked throughout the 4.4-acre site. Drums and other containers were found in various stages of deterioration, fuming, and leaking material onto the soil. Numerous stains were observed on the soil. Due to the on-going removal action, 4,200 empty drums have been shipped off site and approximately 6,700 staged drums remain on the site. The contents of many of the drums are unknown because of a lack of labeling or the presence of multiple labels. Other containers were found labeled "Salvage - Hazardous Waste Rejected".

Other containers found on the site include approximately 150 cylinders, 126 tanks, hundreds of fiberpack drums, gallon bottles, carboys, boxes, and approximately 12,000 laboratory-size containers. Most of the containers appear to be full. Some chemicals suspected to be on the site include: bromine, chromic acid, phosphorous trichloride, hydrochloric acid, xylene, fatty acids, benzene, red phosphorus, and sulfuric acid.

The laboratory present on the site contained thousands of unsegregated laboratory chemicals in deteriorating containers. These materials were haphazardly stored on structurally unstable shelving.

SCOPE AND ROLE OF ACTION

The remediation of the site is complicated by the quantity and condition of surface contamination. This remedy will be considered an early remedial response, based on the FFS report. This action will address surface contamination only (e.g., drums, tanks, laboratory containers) and further stabilize the site until an overall, permanent remedy can be selected. Other potentially contaminated media including soil, ground water, surface water, and buildings will be addressed at a later date when an overall remedial investigation and feasibility study (RI/FS) will be performed.

SUMMARY OF SITE RISKS

In September 1990, EPA requested that ATSDR review site information and data for the White Chemical Corporation site, and characterize the threat to public health posed by the site. ATSDR responded to that request by performing a Health Consultation. ATSDR concluded that the threat of catastrophic release posed by the uncontrolled storage of hazardous substances, and conditions of on-going release at the site, present an imminent and substantial threat to public health.

Because of the limited information available as to the exact nature of the chemicals on the site, a quantitative risk assessment could not be performed as part of the FFS. However, EPA, in consultation with ATSDR, did an analysis to estimate the health problems that could result if the contamination and hazardous conditions at the White Chemical Corporation site were not cleaned up. This assessment, referred to as a Public Health Evaluation (PHE), is presented in the FFS. Because surface contaminants at the site pose a potential immediate health threat, consultations with ATSDR served as the primary supporting information for the PHE.

The PHE focused on identifying chemicals of concern, evaluating pathways of exposure, describing potential receptor populations, and characterizing the consequent health hazards. Due to the limited and uncertain chemical inventory at the site, assessment of site hazards was performed by evaluating chemical classes rather than individual compounds. Many of the compounds identified at the site do not fit into any one particular category; individual compounds may have combined corrosive, oxidizing and shock-sensitive properties. The potential for toxicologic interactions between chemical classes at the site exists. However, in the absence of specific information, this type of interaction has not been considered. Chemical classes of concern at the site include flammable liquids, corrosives, oxidizing agents, and shock sensitive material.

Exposed or potentially exposed populations include nearby residents, workers, and site trespassers. In addition, a future exposure route in case of a catastrophic fire/explosion event could result in two additional potentially exposed populations, fire-fighting personnel and railway commuters. The predominant route of exposure is inhalation for all of the potentially exposed populations, and direct contact for trespassers or fire-fighting personnel.

Non-carcinogenic and carcinogenic adverse health effects have been associated with many of the contaminants identified on the site. Chronic or acute inhalation of or direct contact with site contaminants by individuals could result in deleterious health effects. The release of acid fumes has already occurred on frequent occasions. The potential for nearby residents, workers, and site trespassers to be exposed to contaminants by inhalation and/or direct contact, currently exists. Persons who suffer impaired respiratory function (e.g., asthma, bronchitis) are at greater risk than the general public.

Site circumstances suggest that the present unstable situation could lead to a catastrophic release of hazardous material that would likely affect the surrounding community. Current exposures to on-site hazardous materials and the threat of a catastrophic release posed by the uncontrolled storage of materials on the site pose an imminent and substantial threat to public health.

REMEDIAL ACTION OBJECTIVES

Remedial action objectives have been established for the site in relation to the surface contamination sources. The objectives have been established by considering the known contamination present, the threats to public health and the environment associated with the hazards at the site, and any applicable or relevant and appropriate requirements of other Federal and State environmental laws and regulations.

The objectives of this action are to address those hazards at the site that require immediate attention, and are intended to further stabilize the site until an overall, permanent remedy can be selected. Such an action would continue the stabilization efforts that began with the removal action. Remedial alternatives for a permanent cleanup of the entire site will be evaluated later in an RI/FS.

The specific remedial action objectives for the site are presented below. The remedial objectives are the basis for the development and evaluation of remedial alternatives. The development of remedial alternatives is presented in more detail in the FFS.

The drums, tanks and small containers/gas cylinders located at the site pose several imminent hazards to public health and the environment. Many of the

drums and tanks contain hazardous substances that would pose an immediate threat if they leaked from these containers. Many of the containers are deteriorated and may leak unless they are addressed by an expedited action. The objectives of the early remedial response for the drums, tanks and small containers/gas cylinders are to:

1. Prevent ingestion/inhalation/direct contact with hazardous substances at concentrations posing a potentially imminent and substantial endangerment; and

2. Prevent releases of hazardous substances that would result in or form a catastrophic event (e.g., explosion, fire, generation of contaminant plume) or migration of hazardous substances that would result in contamination of ground water, surface water, soil, or releases into the atmosphere.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or the other active measure considered, may present a current or potential threat to public health, welfare, or the environment.

FOCUSED FEASIBILITY STUDY

Information obtained from the field investigation and the on-going removal action was used to conduct the FFS. The FFS report provides a detailed evaluation of various options, referred to as remedial alternatives, to remediate the site. Remedial alternatives were evaluated based on the nine criteria identified in the FFS report and described later in this document.

SUMMARY OF REMEDIAL ALTERNATIVES

The Comprehensive Environmental Response, Compensation, and Liability Act, as amended, requires that each selected site remedy be protective of human health and the environment, comply with applicable or relevant and appropriate requirements (ARARs), utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable, and be cost effective. The FFS developed and evaluated, in detail, three alternatives for an early remedial response to the surface contamination at the White Chemical Corporation site that might satisfy these criteria.

Alternative 1: No Further Action

Estimated Capital Cost:	$ 0
Estimated Present Worth of Five-Year Review:	$ 38,000

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison of alternatives. Under this alternative, EPA would take no further action to address contamination at the site. (While the on-going removal action will complete additional site-stabilization tasks, EPA's removal authority does not maintain the capacity to complete a removal action of this magnitude and at the same time retain the resources necessary to respond to other emergency situations at other sites. It has been conservatively assumed here that the removal action would not complete any additional work.) The potential for exposure to contaminants is not reduced in this scenario, and exposure-related risks will remain similar to those discussed earlier. The access restrictions (i.e., fencing, warning signs) that were installed and maintained under the removal action would remain in place, but no further maintenance would be provided. However, a review would be conducted after five years to determine site conditions at that time.

Alternative 2: Site Stabilization and On-site Storage

Estimated Capital Cost:	$ 7,767,000
Estimated Annual Operation and Maintenance (O & M) Costs:	$ 2,652,000
Estimated Present Worth:	$18,062,000
Implementation Timeframe:	2 years
O & M Timeframe:	5 years

This alternative, site stabilization and on-site storage, is an interim response action that would be a continuation and modification of the removal action currently in progress. Only limited measures would be taken toward site remediation; i.e., measures to prevent further releases to the environment. Although a percentage of the site stabilization process has been performed by the on-going removal action, it may be necessary to perform some additional activities. The alternative involves compiling an inventory of hazardous substances present and includes restaging and segregating any incompatible materials to prevent uncontrolled chemical reactions. However, it might be necessary to dispose of some of the extremely hazardous materials at off-site facilities to maintain on-site stability of the remaining chemicals. Transferring chemicals to new containers would be performed on containers that are in poor condition to prevent releases from occurring. Consolidation or bulking would be performed if sufficient quantities of compatible materials were found. They would be properly combined and stored on the site in

tanker trucks until a final response action is taken. Empty containers would be rinsed and crushed for disposal. An emergency response contingency plan would be developed to provide a mechanism for responding to any releases, fires, etc., that might occur during the stabilization effort. Further, because large quantities of hazardous material would remain on the site, site security, extensive monitoring and an emergency response contingency plan would be maintained at the site from the completion of the interim remedial action to the initiation of a subsequent, final action for surface contamination.

It is estimated that it would take two years to stabilize the site, and that on-site storage would be required for a period of five years until a final remedial action could be selected and implemented. The site would be reviewed, as mandated by CERCLA, as amended, every five years while hazardous substances remain on the site.

Alternative 3: Stabilization/Treatment and Off-site Disposal

Estimated Capital Cost:	$22,096,000
Estimated Annual O & M Costs:	$ 0
Estimated Present Worth:	$18,261,000
Implementation Timeframe:	2 years

This alternative includes all of the process options and materials handling techniques presented in Alternative 2, however, it also provides for the treatment and off-site disposal of material. This alternative is developed as a final remedy for the contamination sources (i.e., drums, tanks, other containers), but recognizes that additional efforts would be required to complete the overall site remediation. No measures are included in this alternative to address the potential contamination of soil, ground water, surface water, buildings, or other media.

This alternative would include all of the measures employed in Alternative 2, but would also include disposal measures for removing surface contamination from the site. These disposal methods might involve mobilizing a treatment unit or units to the site, and treating or neutralizing some of the materials prior to off-site disposal. If untreated material were found to be sufficiently free of impurities, it would be recycled, as well as some of the treated material.

Once the material has been sufficiently stabilized, bulked, and/or treated, it would be transported off the site to a RCRA-approved treatment facility, to a hazardous waste disposal facility, or to an appropriate facility for recycling or processing. Additional risks which would arise from the off-site transportation of hazardous material would be minimized by utilizing appropriate shipping containers and preparing a transportation safety contingency plan.

Extensive environmental monitoring would be conducted during the implementation of this alternative to ensure the mitigation of any releases. An emergency response contingency plan would also be developed to provide a mechanism for responding to any releases, fires, etc., that might occur during the stabilization, treatment, and off-site disposal efforts. Site security would continue until all material is removed, then security measures could be reduced. Because this would be a final remedy for the surface contamination, a five-year review would not be required.

It is assumed that it would take two years to complete the source remediation under this alternative. Because all of the surface contamination sources will have been removed from the site, no operation and maintenance is anticipated for this alternative. As noted above, site security measures would be reduced, in all likelihood, to passive access restrictions, such as the existing fencing and warning signs.

EVALUATION OF ALTERNATIVES

The preferred alternative is Alternative 3, stabilization/ treatment and off-site disposal. Based on current information, this alternative appears to provide the best balance of trade-offs among the alternatives with respect to the nine criteria that EPA uses to evaluate alternatives. This section profiles the performance of the preferred alternative against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is noted below.

Based on new information or public comments, EPA, in consultation with the State of New Jersey, may modify the preferred alternative or select another response action presented in this Plan and the FFS report. The public, therefore, is encouraged to review and comment on all of the alternatives identified in this Proposed Plan. The FFS report should be consulted for more detailed information on these alternatives.

GLOSSARY OF EVALUATION CRITERIA

- Overall Protection of Human Health and the Environment:

  This criterion addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls or institutional controls.

- Compliance with Applicable or Relevant and Appropriate Requirements of Federal or State of New Jersey Regulations:

  This criterion addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or provide grounds for invoking a waiver.

- Long-term Effectiveness and Permanence:

  This criterion refers to the ability of the remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

- Reduction of Toxicity, Mobility or Volume:

  This criterion addresses the anticipated performance of the treatment technologies that a remedy may employ.

- Short-term Effectiveness:

  This criterion considers the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

- Implementability:

  This criterion examines the technical and administrative feasibility of a remedy, including availability of materials and services needed to implement the chosen solution.

- Cost:

  This criterion includes capital and operation and maintenance costs.

- State Acceptance:

  This criterion indicates whether, based on its review of the FFS and the Proposed Plan, the State concurs with, opposes, or has no comment on the proposed alternative.

- Community Acceptance:

  This criterion will be addressed in the Record of Decision following a review of the public comments received on the FFS report and the Proposed Plan.

COMPARATIVE ANALYSIS OF ALTERNATIVES

Overall Protection of Human Health and the Environment

The No Further Action alternative would provide no further protection of human health and the environment than that afforded by the removal action to date. Deteriorating containers would continue to degrade and release hazardous substances. Small containers and gas cylinders would remain on the site in their present condition. The potential for a catastrophic event would continue and increase with the presence of non-stabilized reactive materials. Because site security measures would be discontinued, trespassing and exposures to hazardous materials could not be prevented.

Alternative 2 is an interim remedial action that would provide a significant level of protection because the site would be stabilized. However, extensive monitoring, security, and preventive maintenance measures would need to be taken to preserve the protectiveness of the action.

Alternative 3 would provide the greatest degree of protection of human health and the environment because, in addition to stabilizing conditions on the site, hazardous materials would be removed from the site for appropriate off-site processing or disposal. Proper materials handling techniques would be employed during the action to ensure that risks are controlled. Additional risks which would arise from the off-site transportation of hazardous materials would be minimized by utilizing appropriate shipping containers and preparing a transportation safety contingency plan.

Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)

Primary ARARs for the White Chemical site include Occupational Safety and Health Administration (OSHA) Standards, the Resource Conservation and Recovery Act, and the Clean Air Act.

There are no chemical-specific ARARs that need to be met for implementing these alternatives.

Alternative 1 would not comply with ARARs because hazardous substances would remain improperly stored on the site. Releases would continue to occur, in violation of Clean Air Act and RCRA requirements.

Alternative 2 would comply with most ARARs, although some RCRA requirements relating to the storage of hazardous materials would not be met. However, because the alternative is an interim measure, and could become part of a total remedial action that would attain ARARs, a basis exists under the National Oil and Hazardous Substances Pollution Contingency Plan for invoking a waiver.

Alternative 3 would comply with ARARs. Activities related to the handling of wastes would comply with all ARARs, including OSHA requirements. Off-site transportation of hazardous materials would be accomplished in accordance with Department of Transportation regulations and hazardous waste management requirements. Materials removed from the site would be treated, processed, or disposed of in accordance with RCRA requirements.

Reduction of Toxicity, Mobility, or Volume Through Treatment

The No Further Action alternative would not reduce the toxicity, mobility, or volume of contaminants to any degree. Additionally, the mobility of the contaminants may significantly increase as the deteriorating containers continue to degrade. In the event of a fire, the toxicity and mobility of the contaminants could also increase.

Alternative 2 would reduce the mobility of the contaminants through the site stabilization effort, however, this reduction would not be achieved through treatment. Although this alternative provides for the removal of extremely hazardous materials, the volume of hazardous substances remaining on the site would not be substantially reduced. Further, there would be no reduction in the toxicity of the material remaining on the site.

Alternative 3 would reduce the toxicity, mobility, and volume, through treatment, of much of the hazardous substances present at the site. The alternative also provides for the recycling of as much material as practical.

Short-Term Effectiveness

Alternative 1 would provide no short-term, effective remedial measures.

Alternatives 2 and 3 would begin to be effective as they are implemented. Both alternatives are expected to be fully effective within a two-year period. Alternative 2 involves the implementation of extensive monitoring and maintenance programs to ensure its effectiveness for both the short- and long-term.

Potential adverse impacts could occur under Alternatives 2 and 3 during their implementation. Proper materials handling practices would need to be employed to minimize the potential for short-term adverse impacts under both alternatives. Alternative 3 would provide an additional potential for short-term impacts through the off-site transportation of hazardous materials; however, these concerns could also be addressed through the preparation of a transportation safety contingency plan.

Long-Term Effectiveness and Permanence

The No Further Action alternative provides no long-term effectiveness and would result in significant risks to human health and the environment remaining at the site. This alternative provides no permanent remedy of site conditions.

Alternative 2 is an interim remedy that provides for extensive monitoring and maintenance activities to ensure its effectiveness for an estimated five-year period. It would be necessary to continue the interim action beyond that period, or implement a more permanent remedy, to provide long-term effectiveness and permanence.

Alternative 3 would be effective in the long-term because the most serious threats posed by the site would be removed for off-site treatment, processing, or disposal. The remedy is considered permanent for the sources of the contamination; however, additional measures would need to be taken to remediate the contamination potentially remaining at the site in other media, such as soil and ground water.

Implementability

There are no remedial measures to be implemented under the No Further Action alternative.

Alternative 2 is easily implemented and, in fact, is an extension of the removal action currently in progress at the site. The necessary materials and equipment are readily obtained. Sufficient personnel trained in the proper techniques are available.

Alternative 3 is also an extension of the removal action and provides for treatment and off-site disposal of material. This alternative is also easily implemented. As with Alternative 2, the necessary materials and equipment are readily obtained. Sufficient personnel trained in the proper techniques are also available.

Cost

Because no actions are taken, other than a one-time monitoring event to review site conditions after five years, Alternative 1 has the lowest present worth, which is estimated to be $38,000. Conversely, Alternative 3, involving the most comprehensive cleanup approach, has the highest present worth. It is estimated to be $18,261,000. The estimated present worth of Alternative 2 is $18,062,000.

State Acceptance

The State of New Jersey supports the preferred remedial alternative presented in this Proposed Plan.

Community Acceptance

Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

SUMMARY OF THE PREFERRED ALTERNATIVE

In summary, the preferred alternative is believed to provide the best balance among alternatives with respect to the evaluation criteria. Therefore, based on the information available at this time, EPA and the State of New Jersey believe the preferred alternative will be protective, will attain ARARs, will be cost-effective, and will utilize permanent solutions and alternative treatment technologies to the maximum extent practicable.

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outside VISTA Chemical Co.

Spec. No. 03-4030-02

ALFOL 10 ALCOHOL

Special ID: 1-DECANOL FOR SHEREX ONLY

TEST	SPECIFICATION	PROPERTY	METHOD
TOTAL ALCOHOL, WT%	98.5 MIN	99.2	V2.000
DISTRIBUTION (100% ALCOHOL)			
C8OH AND LOWER, WT%	0.3 MAX	0.1	V2.000
C10OH, WT%	98 MIN	99.3	V2.000
C12OH AND HIGHER, WT%		0.6	V2.000
ALCOHOL COLOR			
APHA METHOD	10 MAX	0	V1.295
WATER, WT%	0.15 MAX	0.04	V1.350
ACID, AS ACETIC, WT%	0.005 MAX	0.001	V1.430
IODINE NUMBER	0.2 MAX	0.06	V1.510
CARBONYL, AS C=O, PPM	100 MAX	25	V1.515

VVV 000007461

10-May-90

White Chemical Data System Mailing List

Owners and Operators

Transporters

Bee Line
6 Gardner Road
Fairfield, NJ 07006

Bilgrey Cargo, Inc.
150-40 183rd Street
Springfield Gardens, NY 11413

Brown/Thurston Transportation Co.
Brown/Thurston Transort Co.
600 Johnson Road
Charlotte, NC 28206

Matlack, Inc.
P.O. Box 1791
Wilmington, DE 19803

McLean Trucking Company
P.O. Box 213
Winston-Salem, NC 27154

Miller Transporters, Inc.
P.O. Box 1123
Jackson, MS 39215

Moore Transport Inc.
2710 North West Ave
P.O. Box 1816
El Dorado, AR 71731

Moores Trucking
P.O. Box 817
Stelton Rd
Piscataway, NJ 08854

P.I.E. Nationwide
115 Moonachie Ave
Moonachie, NJ 07074

Penta International Corp.
PO Box 1448
Fairfield, NJ 07007

VVV 000007462

Quality Carriers
3108 Central Drive
Plant City, FL 33567

White Chemical Data System Mailing List

Transporters (continued)

Rutgers Express
6 Connerty Court
East Brunswick, NJ 08816

SCA Chemical Services Co.
Earthline Division
100 Lister Avenue
Newark,, NJ 07105

SCA Chemical Services Co.
SCA Model City Landfill
P.O. Box 200
Model City, NY 14407

Shanahan's Express, Inc.
2201 Garry Rd
Cinnaminson, NJ 08077

Sicomac Carriers
273 New Road
Parsippany, NJ 07054

St. Johnsburg Trucking Co.
38 Main St
Jay, VT 05819

Sterns Transport
P.O. Box 397
Bradley Beach, NJ 07720

Superior Carriers
P.O. Box K
Kenvil, NJ 07847

Superior Carriers
95 Madison Avenue
Morristown, NJ

Yellow Freight Systems, Inc.
C/O Yellow Forwarding Company
P.O. Box 7903
10990 Roe Ave
Overland Park, KS 66207

Yellow Freight Systems, Inc.
335 Delancey St
Newark, NJ 07105

White Chemical Data System Mailing List

Transporters (continued)

Generators

3M Company
Box 33131
St. Paul, MN 55133

ACI Chemicals, Inc.
17 Barstow Road
Great Neck, NY 11021

Abbott Labs
P.O. Box 177
1400 Sheridan Road, 13th St. Entrance
North Chicago, IL 60064

Ace Scientific Supply Co.,Inc.
40-A Cotters Lane
P.O. Box 1018
East Brunswick, NJ 08816

Aetna Chemical Corporation
P.O. Box 430
Wallace Street Extension
Elmwood Park, NJ 07407

Air Products and Chemicals, Inc.
P.O. Box 8500 S-4165
Philadelphia, PA 19178

Air Products and Chemicals, Inc.
7201 Hamilton Blvd.
Allentown, PA 18195

Air Products and Chemicals, Inc.
Hometown Facility
P.O. Box 351
R.D. 2
Tamaqua, PA 18252

Air Products and Chemicals, Inc.
P.O. Box 538
Allentown, PA 18105

Albright & Wilson, Inc.
P.O. Box 26229
Richmond, VA 23260

VVV 000007464

White Chemical Data System Mailing List

Generators (continued)

Alcolac
3440 Fairfield Road
Baltimore, MD 21226

Alden Leeds, Inc.
55 Jacobus Ave.
South Kearny, NJ 07032

Aldrich Chemical Company,Inc.
P.O. Box 355
Milwaukee, WI 53201

Aldrich Chemical Company,Inc.
1001 West St. Paul
Milwaukee, WI 53233

Aldrich Chemical Company,Inc.
230 S. Ember Lane
Milwaukee, WI 53233

Almet, Inc.
300 Hartzell Road
P.O. Box 346
New Haven, IN 46774

Alnort Processing Co.
2500 Broadway
Camden, NJ 08104

Alnort Processing Co.
2430 Broadway
Camden, NJ 08104

Aluchem
01 Landy Lane
Reading, OH 45215

Amchem Products, Inc.
Parker and Amchem
32102 Stephenson Highway
Madison Heights, MI 48071

Ameribrom, Inc.
1250 Broadway
New York, NY 10001

American Cyanamid Company
1 Cyanamid Plaza
Wayne, NJ 07470

VVV 000007465

White Chemical Data System Mailing List

Generators (continued)

American Cyanamid Company
P.O. Box 1809
Clifton, NJ 07002

American Cyanamid Company
Clarksville Road
Peton, NJ 08540

American Cyanamid Company
P.O. Box 390
Bound Brook, NJ 08805

American Fast Print
Hwy 1-85 at Bryant Road
P.O. Box 5765
Spartansburg, SC 29304

American Hoechst
Route 202-206 North
Somerville, NJ 08876

American Hoechst
1250 West Mock Yard Lane
Dallas,, TX 75247

American International Chemical
27 Strathmore Road
Natick, MA 01760

American Leather
2195 Elizabeth Avenue
Rahway, NJ 07065

Ametek Microfoam Division, Inc.
Brandywine Four Bldg.
Routes 1 and 202
Chadds Ford, PA 19317

Amoco Research Center
Warrenville Road & Mill Street
Naperville, IL 60566

Anax R & D Lab
5950 McIntyre Avenue
Golden, CO 80403

Apache Chemical, Inc.
16161 Sixth Street
P.O. Box 126
Seward, IL 61077

VVV 000007466

White Chemical Data System Mailing List

Generators (continued)

Appropriate Technology
P.O. Box 975
Technology Drive
Brattleboro, VT 05301

Aptec, Inc.
P.O. Box 1726
25 South Shore Drive
Toms River, NJ 08753

Arkansas Eastman Company
P.O. Box 2357
Batesville, AR 72501

Ashland Chemical Division
P.O. Box 2219
Columbus, OH 43216

Ato Chem
266 Harristown Road
P.O. Box 607
Glen Rock, NJ 07452

Atomergic Chemetals Corp.
91 Carolyn Blvd.
Farmingdale, NY

Aztec Chemicals
2190 North Loop West, Suite 202
Houston, TX 77018

B & P Chemical Company, Inc.
128 Boser Drive
Oakland, NJ 07436

B&P Environmental Resources
555 Goffle Road
Ridgewood, NJ 07451

B.F. Goodrich Corporation
9921 Brecksville Road
Brecksville, OH 44141

B.P.F.
301 E. Meadowview Road
Greensboro, NC 27420

VVV 000007467

B.P.F.
Mr. H. Bennett
B.R. Laboratory
714 West 51st Street
Miami Beach, FL 33140

White Chemical Data System Mailing List

Generators (continued)

B.W. Services, Inc.
P.O. Drawer 2300
Keystone Heights, FL 32656

BASF Wyandotte Corporation
100 Cherry Hill Road
P.O. Box 181
Parsippany, NJ 07054

BGF Industries, Inc.
401 Amherst Ave.
Altavista, VA 24517

BTS Incorporated
P.O. Box B14
300 Communipaw Ave.
Jersey City, NJ 07304

Badische Corporation
Mr. Bob Oats
Marketing
Badische Corp.
P.O. Drawer D
Williamsburg, VA 23187

Basic Transportation Inc.
110 Shrewsbury Drive
Livingston, NJ 07039

Bedoukian Research Inc.
Mr. Tom Csengery
Finance Drive
Commerce Park
Danbury, CT 06810

Beecham Inc.
Mr. Richard Goltermann
Three Garret Mountain Plaza
West Patterson, NJ 07424

Belding Corticelli Thread Co.
107 Providence St.
Putnam, CT 06260

VVV 000007468

Bergen Barrel & Drum Co.
43-45 O'Brien St.
Kearny, NJ 07032

White Chemical Data System Mailing List

Generators (continued)

Bernuth, Lembcke Co., Inc.
Mr. Peter W. Gilderson
President
7600 West Tidwell Road
Suite 204
Houston, TX 77040

Bernuth, Lembcke Co., Inc.
999 Ponce De Leon Blvd.
No. 650
Coral Gables, FL 33134

Bicron Corporation
12347 Kinsman Road
Bldg. #C2
Newbury, OH 44065

Biddle Sawyer Corporation
Biddle Sawyer Corp.
Suite 2355
2 Penn Plaza
New York, NY 10121

Bio-Life Inc.
Mr. Merle McGrane
P.O. Box 130
Ionia, IA 50645

Biocraft Laboratories
Ms. Joy Sneyder
Director of Purchasing
92 Route 46
Elmwood Park, NJ 07407

Biodex Inc.
Mr. Dave Burton
165 - 8th Street
Room 306
San Francisco, CA 94103

Blue Eagle Corporation
P.O. Box 377
Oak Ridge, NJ 07438

Bohager/Goodhues, Inc.
Mr. Joseph A. Campanella
Vice President
521 E. Joppa Road
Suite 104
Towson, MD 21204

VVV 000007469

White Chemical Data System Mailing List

Generators (continued)

Boise Cascade Corporation
Mr. George McBride
Specialty Paperboard Division
100 Main Street
P.O. Box 68
Beaver Falls, NY 13305

Bonmar Chemical Co., Inc.
Mr. Sanford Cohen
P.O. Box 494
Fair Lawn, NJ 07410

Bowman Transportation, Inc.
Executive Offices
P.O. Box 105121
Atlanta, GA 30348

Brandywine Chemical Co.
600 Terminal Avenue
New Castle, DE 19720

Brenntag Interchem, Inc.
Mr. Jeffrey J. Hallamore
General Manager
211 Rock Hill Road
Bala Cynwya, PA 19004

Bristol-Myers Company
Ms. Joanna A. Rice
Industrial Division
P.O. Box 4755
Syracuse, NY 13221

Bristol-Myers Company
345 Park ave.
New York, NY 10154

Brown Mat Inc.
P.O. box 2069
Brownsville, TX 78522

Brunswick Defense Corporation
Mr. Joe DeCillis
2000 Brunswick Lane
Deland, FL 32724

VVV 000007470

Brunswick Defense Corporation
Bunswick Corp. Defense Div.
1 Brunswick Plaza
Skokie, IL 60077

White Chemical Data System Mailing List

Generators (continued)

Bruzynski Research Institute
Mr. Linwood Clayton
12707 Trinity Drive
Stafford, TX 77477

Buck Scientific Inc.
58 Fort Point Street
East Norwalk, CT 06855

Burlington Industries, Inc.
Box 21448
301 E. Meadowview Rd.
Greensboro, NC 27420

Burlington Industries, Inc.
3330 Friendly Ave.
P.O. Box 21207
Greensboro, NC 27420

CDI Dispersions
P.O. Box 2639
27 Haynes Avenue
Newark, NJ 07114

CEMCO
P.O. Box 9797
Greensboro, NC 27429

Calgon Corporation
Box 1346
Pittsburgh, PA 15230

Callahan Chemical Co.
200 Industrial Ave.
Ridgefield Park, NJ 07660

Cape Industries
P.O. Box 1694
Wilmington, NC 28402

Cape Industries
24055 Mound Road
Warren, MI 48091

VVV 000007471

Catalyst Resources,Inc.
2190 North Loop West Suite 400
Houston, TX 77018

Generators (continued)

Champion Chemical
1100 Richmond Avenue, #400
Houston, TX 77042

Champion Chemical
3130 FM 521
Fresno, TX 77545

Charles Schaefer Sons, inc.
P.O. Box 236
Elizabeth, NJ 07207

Charles Schaefer Sons, inc.
Magee Avenue and Harding Road
Union, NJ

Chemical Compounds, Inc.
P.O. Box 115
Netcong, NJ 07857

Chemical Dynamics Corporation
3001 Hadley Road
P.O. Box 395
South Plainfield, NJ 07080

Chemical Waste Management
P.O. Box 100285
Atlanta, GA 30384

Chemical Waste Management
3003 Butterfield Road
Oak Brook, IL 60521

Chemland
P.O. Box 2999
Turlock, CA 95881

Chevron Chemical Company
P.O. Box 8500 S-6965
Philadelphia, PA 19178

Chevron Chemical Company
575 Market Street
San Francisco, CA 94105

VVV 000007472

Chugai Boyeki (America) Corp.
500 Fifth Avenue
New York, NY 10110

White Chemical Data System Mailing List

Generators (continued)

Chugai Boyeki (America) Corp.
55 Mall Drive
Commack, NY 11725

Chugai International Corp.
500 Fifth Ave.
New York, NY 10110

Chugai International Corp.
Chugai USA Inc.
3780 Hawthorne Ct.
Waukegan, IL 60087

Ciba-Geigy Corporation
P.O. Box 65108
Charlotte, NC 28265

Ciba-Geigy Corporation
566 Morris Ave.
Summit, NJ 07901

Ciba-Geigy Corporation
Dyestuffs, Chemicals Org/Inorg. Pigments
Saw Mill River Road
Ardsley, NY 10502

Ciba-Geigy Corporation
Plastic Additives Water Treatment
3 Skyline Drive
Hawthorne, NY 10532

Ciba-Geigy Corporation
Dyestuffs & Chemicals Division
P.O. Box 18300
Greensboro, NC 27419

Cinelli Scrap Metal, Inc.
P.O. Box 414
Carlstadt, NJ 07072

Cinelli Scrap Metal, Inc.
130 Jacelyn Avenue
Woodridge, NJ 07075 VVV 000007473

Clean Harbor Corp.
P.O. Box 327
Braintree, MA

White Chemical Data System Mailing List

Generators (continued)

Clean Harbor Corp.
1200 Crown Colony Drive
P.O. Box 9137
Quincy, MA 02269

Colgate Palmolive
105 Hudson Street
Jersey City, NJ

Cometals, Inc.
One Penn Plaza Suite 4901
New York, NY 10119

Commodity Chemical Corp.
P.O. Box 4397
Vero Beach, FL 32961

Continental Chemical Co.
207 Clifton Boulevard
Clifton, NJ 07015

Coyne Chemical
3015 State Road
Croydon, PA 19020

Crown Metro, Inc.
P.O. Box 5695
Greenville, SC 29606

Crown Metro, Inc.
Echelon Road
Greenville, SC 29606

Crown Metro, Inc.
P.O. Box 5857
Greenville, SC 29606

D & O Chemical
300 Grand Ave
Englewood, NJ 07631

D & O Chemical
P.O. Box 29
Fort Lee, NJ 07024

VVV 000007474

D & O Chemical
291 S. Van Brunt Street
Englewood, NJ 07631

White Chemical Data System Mailing List

Generators (continued)

Dana Transport
P.O. Box 370
Avenel, NJ 07001

Deepwater Inc.
935 E. Victoria Street
Carson, CA 90224

Deerborn Chemical Division
300 Genesee Street
Lake Zurich, IL 60047

Delaware Container Co., Inc.
West Eleventh Ave & Valley Rd
Coatesville, PA 19320

Dial Corporation
Fatty Acids Sales Manager
2000 Ancutt Road
Montgomery, IL 60538

Diamond Shamrock Corporation
TR Evans Research Center
7528 Auburn Road
Painesville, OH 44077

Dixie Chemical Co.
10701 Bay Area Blvd.
Pasadena, TX 77507

Dow Chemical Corp.
Building 1710
Midland, MI 48640

Dow Chemical USA
PO Box 1724
Midland, MI 48640

Dow Chemical USA
2020 Willard H. Bow Center
Midland, MI 48674

Dow Corning Corp.
PO Box 7247-8879
Philadelphia, PA 19170

VVV 000007475

Dow Corning Corp.
Dept. A0021
P.O. box 0999
Midland, MI 48686

White Chemical Data System Mailing List

Generators (continued)

E.I. duPont de Nemours & Co. Inc.
Brandywine Building
7th Floor
Wilmington, DE 19898

E.I. duPont de Nemours & Co. Inc.
Corporate Headquarters
Barley Mill Plaza
Bldg. 29
Wilmington, DE 19880

E.I. duPont de Nemours & Co. Inc.
1007 Market Street
Wilmington, DE 19898

EM Science
2909 Highland Avenue
Cincinnatti, OH 45212

Eastern Chemical Division
United-Guardian, Inc.
P.O. Box 2500
Smithtown, NY 11787

Eastman Kodak Company
1041 Ridge Road West
Rochester, NY 14652

Eastman Kodak Company
343 State Street
Rochester, NY 14652

Eastman Kodak Company
Plant K.O.
Building 7, Fl. 19
Rochester, NY 14650

Econalytic Systems, Inc.
2995 Wilderness Place
Boulder, CO 80301

Economic Development Corp of Essex Cnty
443 Northfield Avenue
West Orange, NJ 07052

Eli Lilly and Company
P.O. Box 685
Lafayette, IN 47902

VVV 000007476

White Chemical Data System Mailing List

Generators (continued)

Ethyl Corporation
Chemicals Division
451 Florida Blvd.
Baton Rouge, LA 70801

Ethyl/Saytex
879 Main Street
Sayreville, NJ 08872

Exxon Chemical Company, U.S.A.
P.O. Box 3272
Houston, TX 77001

FMC Corporation
2000 Market St
Philadelphia, PA 19103

Fallek Chemical
2125 Central Ave.
Fort Lee, NJ 07024

Fanwood Chemical, Inc.
219 Martine Avenue, North
P.O. Box 159
Fanwood, NJ 07023

Ferro Corporation
3000 Sheffield Ave
Hammond, IN 46320

Ferro Corporation
Bedford Chemical Division
7050 Krick Road
Bedford, OH 44146

Ferro Corporation
Grant Chem. Division
P.O. Box 263
Baton Rouge, LA 70821

Ferro Corporation
1 Erieview Plaza
Cleveland,, OH 44114

VVV 000007477

Fine Pigments, Inc.
180 Blanchard St
Newark, NJ 07105

White Chemical Data System Mailing List

Generators (continued)

Fisher Scientific
1 Reagent Lane
Fair Lawn, NJ

Fisher Scientific
711 Forbes ave.
Pittsburgh, PA 15219

Flexible Products Company
P.O. Box 3190
1007 Industrial Drive
Marietta, GA 30061

Fluid Energy Processing & Equipement Co.
P.O. Box A
153 Penn Ave
Hatfield, PA 19440

Freeman Industries, Inc.
P.O. Box 415
914 Woodbine 1-2100
Tuckahoe, NY 10707

Freeman Industries, Inc.
100 Marbledale Road
Tuckahoe, NY 10701

Frey Industries, Inc.
29 Riverside Ave
Newark, NJ 07104

GAF
P.O. Box 700
Linden, NJ 07036

GAF
1361 Alps Road
Wayne, NJ 07470

General Chemical Corporation
P.O. Box 360464 H
Pittsburgh, PA 15251

General Chemical Corporation
P.O. Drawer 2168
1627 Abutment Rd
Dalton, GA 30722

VVV 000007478

White Chemical Data System Mailing List

Generators (continued)

General Chemical Corporation
90 E. Halsey Road
P.O. Box 393
Parsippany, NJ 07054

General Felt Industries, Inc.
President, CEO
Park 80 Plz W
Saddle Brook, NJ 07662

General Laboratory Supply Company
438 Pompton Road
Wayne, NJ 07470

General Plastic & Chemical Corp.
848 Beacon Street
Boston, MA 02216

General Plastic & Chemical Corp.
159 Boden Lane
Natick, MA 01760

Givaudan Corporation
125 DElawana Ave
Clifton, NJ 07014

Givaudan Corporation
100 Delawanna Ave.
Clifton, NJ 07014

Glenery, Inc.
P.O. Box 392
Kearny, NJ 07032

Great Lakes Chemical
P.O. Box 92894
Chicago, IL 60675

Great Lakes Chemical Corporation
P.O. Box 2220
Highway 52 NW
West Lafayette, IN 47906

Greensboro Finishing
P.O. Box 21448
301 E. Meadowview Rd.
Greensboro, NC 27420

VVV 000007479

White Chemical Data System Mailing List

Generators (continued)

Gulf Oil Chemicals Company
P.O. Box 6200B
Pittsburg, KS 66762

Gulf Oil Chemicals Company
P.O. Box 509
Bayton, TX 77521

Hawkins Chemical, Inc.
3100 East Hennepin Ave
Minneapolis, MN 55413

Helena Chemical
P.O. Box 159
Shrewsbury, PA 17361

Helm U.S. Chemical
1110 Centennial Dr
Piscataway, NJ 08854

Hexagon Enterprises, Inc.
60 Midvale Road
Mountain Lakes, NJ 07046

Hexagon Enterprises, Inc.
P.O. Box 18023
Newark, NJ 07191

High Point Chemical
PO Box 2316
255 Beddington St
High Point, NC 27261

Hoechst Celanese Chemical Group, Inc.
PO Box 8500-S-6430
Philadelphia, PA 19178

Hoechst Celanese Chemical Group, Inc.
1250 W. Mockingbird Lane
Dallas, TX 75247

Hoffman - La Roche, Inc.
340 Kingland Street
Nutley, NJ 07111

Hooker Chemical
345 Third Ave
Niagara Falls, NY 14302

VVV 000007480

Generators (continued)

Hordo Chemical, Inc.
PO Box 9931
Bakersfield, CA 93389

Hummel Croton, Inc.
10 Harmich Rd
South Plainfield, NJ 07080

Humphrey Chemical Corporation
PO Box 2 Edgewood Area
Aberdeen Proving Gnd, MD 21010

Hunter Douglas, Inc.
601 Alter Street
Broomfield, CO 80020

Huntsman Chemical Corp.
President
60E South Temple Street, 2000
Salt Lake City, UT 84111

ICC Industries
720 Fifth Ave
New York, NY 10019

ICD Group Inc.
600 Madison Ave., 17th Fl.
New York, NY 10022

ICI Americas, Inc.
Concord Pike & Murphy Rd
Wilmington, DE 19897

ICP Chemical Group, Inc.
PO Box 156
Lido Beach, NY 11561

IFP Enterprises Inc.
680 Fifth Ave
New York, NY 10019

Inmont
201 Armistice Rd
Pawtucket, RI

Inmont
125 Broad Street
Clifton, NJ 07015

VVV 000007481

White Chemical Data System Mailing List

Generators (continued)

Inolex Chemical Company
Jackson & Swanson Streets
Philadelphia, PA 19148

Insulated Technologies Corporation
PO Box 66
Darby, PA 19023

International Flavors & Fragrances
600 State Highway
Hazlet, NJ 07730

International Flavors & Fragrances
521 W. 517th Street
New York, NY 10019

J.A. Miller, Inc.
50 Chestnut Ridge Road
Suite 117
Montvale, NJ 07645

J.F. Henry Chemical Co., Inc.
P.O. Box 2050
Foot of Fenwick St
Newark, NJ 07114

J.G. Eberlein & Co., Inc.
90 West street
New York, NY 10006

J.T. Baker Chemical Co.
222 Red School Lane
Phillipsburg, NJ 08865

Jame Fine Chemicals, Inc.
100 West Main Street
P.O. Box 669
Bound Brook, NJ 08805

Jarchem Industries, Inc.
40 Balol Street
Newark, NJ 07105

Jarchem Industries, Inc.
414 Wilson Ave.
Newark, NJ 07105

John Boyle and Company
Mr. John Boyle
John Boyle Co.
P.O. Drawer 791
Salisbury Road
Statesville, NC 28677

VVV 000007482

White Chemical Data System Mailing List

Generators (continued)

Jonas Chemical Corporation
5 Beekman St
New York, NY 10038

Jonas Chemical Corporation
16821 59th Street
Brooklyn, NY 11204

Jones Chemicals, Inc.
100 Sunny Sol Blvd
Caledonia, NY 14423

K & K Laboratories Division
ICN Biomedicals, Inc.
121 Express Street
Plainview, NY 11803

Kalama Chemical Inc.
1110 Bank of California Center
Seattle, WA 98164

Kelco Division
Merck & Co. Inc.
20 Wacker Drive
Chicago, IL 60606

Kelco Division
8355 Aero Drive
San Diego, CA 92123

Kenrich Petrochemicals, Inc.
140 East 22nd Street
P.O. Box 3[illegible]
Bayonne, NJ 07002

Key Polymer Corporation
Jacobs Way
Lawrence Industrial Park
Lawrence, MA 01842

King's Laboratory, Inc.
Route 1
P.O. Drawer 120
Blythewood, SC 29016

Kowa American Corp.
Importers and Exporters
1140 Avenu of americas
New York, NY 10036

VVV 000007483

White Chemical Data System Mailing List

Generators (continued)

Kramer Chemicals, Inc.
P.O. Box 1299
Allwood Station
Clifton, NJ 07012

Kramer Chemicals, Inc.
935 Allwood Road
Clifton, NJ 07012

Kramer Chemicals, Inc.
206 Clifton Blvd.
Clifton, NJ 07012

L.J. & M. LaPlace
Leliart's Lane
Elmwood Park, NJ 07407

Lake Chemical Co.
LA-CO Industies, Inc.
270 N. Washtenaw
Chicago, IL 60612

Lidochem, Inc.
20 Village Court
Havlet, NJ 07730

Lonza Inc.
22-10 Route 208
Fairlawn, NJ 07410

Ludlow Industrial Park
60 Washington Street
Conshohocker, PA 19428

Lydall, Inc.
Manning Division
PO Box 328
Troy, NY 12181

M & T Chemicals, Inc.
Woodbridge Road & Randolph Ave.
P.O. Box 1104
Rahway, NJ 07065

M. Michel and Company, Inc.
90 Broad Street
New York, NY 10004

VVV 000007484

White Chemical Data System Mailing List

Generators (continued)

Maag Agrochemicals Inc.
P.O. Box 6430
Vero Beach, FL 32961

Malden Mills
46 Stafford Street
Lawrence, MA 01841

Mallinkrodt, Inc.
P.O. Box 5349
St. Louis, MO 63147

Mallinkrodt, Inc.
President
675 McDonnel Blvd.
St. Louis, MO 63134

Marubeni American Corp.
President-CEO
200 Park Avenue
New York, NY 10166

Matheson Gas Products, Inc.
P.O. Box 23029
Newark, NJ 07189

Maybrook, Inc.
P.O. Box 68
Lawrence, MA 01842

Maypro Industries, Inc.
550 Mararoneck Ave.
Harrison, NY 10528

McGean-Rohco, Inc.
2910 Harvard Ave
P.O. Box 09087
Cleveland, OH 44109

McGean-Rohco, Inc.
1252 Terminal Tower
Cleveland, OH 44113

McGean- ohco, Inc.
) Public Square
oom 1250
Cleveland, OH 44113

VVV 000007485

White Chemical Data System Mailing List

Generators (continued)

Melamine Chemicals, Inc.
River Road
P.O. Box 748
Donaldsonville, LA 70346

Mellen Chemicals, Inc.
211 Randolph Ave
Avenel, NJ 07001

Merck & Co., Inc.
126 E. Lincoln Ave.
Rahway, NJ 07065

Merck & Co., Inc.
P.O. Box 2000
Rahway, NJ 07065

Mitsubishi International Corp.
520 Madison Ave
New York, NY 10022

Mitsubishi International Corp.
875 Supreme Drive
Bensenville, IL 60106

Mitsui & Co. (U.S.A.), Inc.
200 Park Avenue
New York, NY 10166

Mobay Corporation
Mobay Road
Pittsburgh, PA 15205

Mobil Chemical Co.
Chemical Products Division
P.O. Box 26683
Richmond, VA 23261

Mobil Chemical Co.
150 E. 42nd Street
New York, NY 10017

Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

Monson Chemicals Inc.
154 Pioneer Drive
Leominster, MA 01453

VVV 000007486

White Chemical Data System Mailing List

Generators (continued)

Morre-Tec Industries Inc.
500 Westfield Ave
Elizabeth, NJ 07208

Morton- Thiokol
P.O. Box 2184
1116 Tanner Rd
Taylors, SC 29687

Morton- Thiokol
110 N. Wack Drive
Chicago, IL 60606

Morton- Thiokol
P.O. Box 368
Greenville, SC 29602

Myrton & Noel Assoc., Inc.
1440 Boynton Avenue
Westfield, NJ 07090

NIPA Labs
3411 Siverside road
104 Hagley Building
Wilmington, DE 19810

NL Chemicals/NL Industries, Inc.
PO Box 700
Hightstown, NJ 08520

Nagase American Corporation
500 Fifth Ave.
New York, NY 10110

Nalco Chemical
One Nalco Center
Naperville, IL 60566

Natico, Inc.
6700 South Leclaire Ave.
Chicago, IL 60638

National Caselie of N.J.
PO Box 226
Riverton, NJ 08077

National Starch and Chemical Corporation
PO Box 100141
Atlanta, GA 30384

White Chemical Data System Mailing List

Generators (continued)

National Starch and Chemical Corporation
10 Finderne Avenue
Bridgewater, NJ 08807

Noodex Inc.
Turner Place
Piscataway, NJ 08854

Novick Chemical, Inc.
35 Walnut Avenue
Clark, NJ 07066

Nyacol Products Inc.
Megunco Road
PO Box 349
Ashland, MA 01721

Orbis Products Corporation
140 Route 10
East Hanover, NJ 07936

Orbis Products Corporation
55 Virginia Street
Newark, NJ 07116

PAN Chemical Corporation
1 Washington Ave
Hawthorne, NJ 07507

PMC Corp
Industrial Avenue
Ford, NJ

PPG Industries
PO Box 1000
Columbia Southern Rd
Lake Charles, LA 70602

PPG Industries
1 PPG Place
Pittsburgh, PA 15271

Park Trading Co.
PO Box 9521
Providence, RI 02940

Park Trading Co.
976 Park Avenue
Cranston, RI

VVV 000007488

White Chemical Data System Mailing List

Generators (continued)

Pennwalt Corporation
Lucidol Division
1740 Military Road
Buffalo, NY 14240

Phillip Hunt Chemical
1 Wellington Rd
Lincoln, RI 02865

Pittman Moore
PO Box 207
Terre Haute, IN 47808

Poly Extrusions
4325 Murray Street
Halton City, TX 76117

Pratsil Inc.
P.O. Box 859
Bound Brook, NJ 08805

Pressure Chemical
3419 Mallman Street
Pittsburgh, PA 15201

Preston Trucking Co., Inc.
151 Easton Blvd
Preston, MD 21655

Proctor & Gamble Co.
B Building
11520 Reed Hartman Hwy
Cincinnati, OH 45241

Proctor & Gamble Co.
1 Proctor & Gamble Plaza
Cincinnati, OH 45202

Proctor & Gamble Co.
Industrial Chem. Division
P.O. Box 599
Cincinnati, OH 45201

Quantum Lab Supply Inc.
6351-H Yarrow Drive
Carlsbad, CA 92008

Quick Chemical Inc.
200 Winston Drive
Cliffside Park, NJ 07010

VVV 000007489

Generators (continued)

R.T. Vanderbilt Company, Inc.
30 Winfield St
Norwalk, CT 06855

Rambach Chemical Co. Inc.
PO Box 5187
Newark, NJ 07105

Reigel Textile Corp.
1150 Hammond Drive
Suite A-1200
Atlanta, GA 30328

Reigel Textile Corp.
P.O. Box 329
Ware Shoals, SC 29692

Reilly Industries
President
151 North Delaware Street 1510
Indianapolis, IN 46204

Reliance Chemical Products Company
64 Avenue A
PO Box 336
Bayonne, NJ 07002

Rhone Poulenc, Inc.
Black Horse Lane
P.O. Box 125
Monmouth Junction, NJ 08852

Rhone-Poulenc Ag Co.
P.O. Box 12614 (Rm 2127)
Res. Triangle Park, NC 27709

Rhone-Poulenc Basic Chemical Co.
Dir. of Environmental Services
One (1) Corporate Drive
Shelton, CT 06484

Robecco Chemicals, Inc.
P.O. Berth 80
Elizabeth Pier, NJ 07207

Robert I. Webber Company, Inc.
26 Sixth St
Stamford, CT 06905

Generators (continued)

Roche Products Inc.
PO Box 452
Manati, PR 00701

Rockland Industries
1601 Edison Highway
P.O. Box 17293
Baltimore, MD 21213

Rohm and Haas Company
Independence Mall West
Philadelphia, PA 19105

Russell-Stanley East, Inc.
River Road & State Street
Camden, NJ 08105

Russell-Stanley East, Inc.
Russell Stanley Corp.
Conbery Blvd.
P.O. Box 458
Woodbridge, NJ 07095

SRS Inc.
1200 Sylvan St
Linden, NJ 07036

Sargent-Welch Scientific Co.
35 Stern Ave
Springfield, NJ 07081

Sargent-Welch Scientific Co.
7300 N. Linder Ave.
P.O. Box 1026
Skokie, IL 60077

Saytech Inc.
879 Main St
Sayreville, NJ 08872

Saytech Inc.
P.O. Box 171760
Newark, NJ 07194

Schaefer Salt & Chemical
P.O. Box 236
Elizabeth, NJ 07207

VVV 000007491

White Chemical Data System Mailing List

Generators (continued)

Schering Plough
President
One Giralda Farms
Madison, NJ 07940

Seidler Chemical & Supply Co.
27 Haynes Avenue
Newark, NJ 07114

Signo Trading International, Ltd.
208 S. 14th Avenue
Mt. Vernon, NY 10550

Signo Trading International, Ltd.
208 S. 14th Avenue
Mt. Vernon, NY 10550

Solem Industries
5824D Peachtree Corners East
Norcross, GA 30092

Solem Industries
4940 Peachtree Industrial Blvd.
Norcross, GA 30071

Spectrum Chemical Mfg. Corp.
Vice President
14422 S. San Pedro Street
Gardena, CA 90248

Spray Drying Service, Inc.
501 North Avenue
Garwood, NJ 07027

Squibb Manufacturing
P.O. Box 609
Humacao, PR 00661

Stauffer Chemical Co.
1200 south 47th St
Richmond, VA 94804

Stockton Sales, Inc.
44 Ryders Lane
P.O. Box 983
East Brunswick, NJ 08816

Suburban Chemical Co.
59 Lee Avenue
P.O. Box 8690
Haledon, NJ 07538

VVV 000007492

Generators (continued)

T.E. Nesby Inc.
Biotics & Biologicals
2227 No. Pleasant
Fresno, CA 93711

T.E. Plastic
Parkersburg Center
5th Ave. & Avery Street
Parkersburg, WV 25102

TCI
150 Meadowland Parkway
P.O. Box 2458
Secaucus, NJ 07096

Tanner Chemical
PO Box 1967
Greenville, SC 29609

Tennessee Eastman Company
P.O. Box 511
Bldg. 75
Kingsport, TN 37662

Textile Chemical Company
Pottsville Pike & Huller Lande
Reading, PA 19605

Thomas Scientific
99 High Hill Road at 1-295
Box 99
Swedesboro, NJ 08085

Troy Chemical Corporation
1 Avenue L
Newark, NJ 17105

Tunnel Barrel & Drum Co., Inc.
85 Triangle Blvd
Carlstadt, NJ 07072

Turnbull Corporation
400 Valentine St
Hackettstown, NJ 07840

Twin Lake Chemical Inc.
520 Mill St
PO Box 411
Lockport, NY 14094

VVV 000007493

Generators (continued)

U.S. Industrial Chemicals Co.
P.O. Box 98752
Chicago, IL 60693

Union Carbide
Electronics Division
8888 Balboa Avenue
San Diego, CA 92123

Union Carbide
Headquarters
390 Ridgebury Road
Danbury, CT 06817

Union Carbide
514 University Plaza
Hackensack, NJ 07601

Union Carbide Chemicals & Plastics Co.
Old Ridgebury Road
Danbury, CT 06817

Union Carbide Chemicals & Plastics Co.
1 University Plaza
Hackensack, NJ 07601

Uniroyal Chemical Corporation
World Headquarters
Middlebury, CT 06749

Uniroyal Chemical Corporation
Research Laboratories
120 Huron Street
Guelph, OT

Unitas Corporation
152 Madison Avenue
New York, NY 10016

United Jersey Bank/Commercial Trust
Vice President
15 Exchange Place
Jersey City, NJ 07302

Valchem Chemical Division
1407 Broadway
New York, NY 10018

VVV 000007494

White Chemical Data System Mailing List

Generators (continued)

Van Waters & Rogers, Inc.
160 Essex Ave East
Avenel, NJ 07001

Vanchlor Co. Inc.
N Transit Rd
Lockport, NY 14094

Veckridge Chemical Co.
60-70 Central Avenue
Kearny, NJ 07032

Vista Chemical company
9794918-00 → customer
PO Box 75422
Charlotte, NC 75422

Walsh Chemical
207 Telegraph Drive
Gastoniz, NC 28052

Walsh Co.
President
c/o John J. McClure Agency
1700 Race Street
Philadelphia, PA 19103

West Agro-Chemical, Inc.
PO Box 1386
Shawnee Mission, KS 66222

West Design Chemical Inc.
4350 Johnson Dr
Suite 280
Fairway, KS 66205

White Cross Laboratories Inc.
PO Box 1075
Rye, NY 10580

Witco Chemical Co
6200 W. 51st St
Chicago, IL 60638

VVV 000007495

Attachment 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

July 12, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Vista Chemical Company
9794918-00
P.O. Box 75422
Charlotte, NC 75422

Re: Request for Information Pursuant to 42 U.S.C. §9601 et seq. and 42 U.S.C. §6901 et seq., White Chemical Corporation Site, Newark, New Jersey.

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) is charged with responding to the release and/or threatened release of hazardous substances, pollutants and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended, 42 U.S.C. §9601 et seq and the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6901 et seq.

EPA has documented the release and/or threatened release of hazardous substances into the environment at the White Chemical Corporation Site, (the Site). Pursuant to Section 104 of CERCLA, 42 U.S.C. §9604, and Section 3007 of RCRA, 42 U.S.C. §6927, EPA may request certain information from parties who handle or have handled hazardous substances and hazardous waste, as those terms are defined at Section 101(14) of CERCLA, 42 U.S.C. §9601(14), and Section 1004 of RCRA, 42 U.S.C. §6903, respectively. Section 104(e) of CERCLA, 42 U.S.C. §9604(b), enables EPA to request relevant information or documents relating to the nature and quantity of materials which have been or are generated, treated, stored, or disposed of at a facility or transported to a facility.

Pursuant to these statutory provisions, EPA hereby requires that your company answer questions posed in the attached "Request for Information" letter. If your company has an EPA Identification Number, kindly state it in your response.

VVV 000007496

Your company's response to the "Request for Information" should be postmarked or received by EPA within twenty-one (21) calendar days of your receipt of this letter. The company's response should be mailed to:

Ms. Silvina Fonseca
New Jersey Superfund Branch - I
U.S. Environmental Protection Agency, Region II
26 Federal Plaza, Room 711
New York, New York 10278

with a copy to Bruce Aber, Esq., Office of Regional Counsel, Room 309 at the same address.

Your company's failure to respond to the "Request for Information" within the time specified above may subject it to an enforcement action under Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5), and/or Section 3008 of RCRA, 42 U.S.C. §6928. An enforcement action may include the assessment of penalties of up to $25,000 for each day of continued noncompliance. The notarized signature of an officer or other responsible official of the company must appear on the enclosed "Certification of Answers to Request for Information", which should be attached to the response to this "Request for Information".

Be advised your company is under a continuing obligation to supplement its response if information not known or not available to the company as of the date of submission of its response should later become known or available. If at any time in the future the company obtains or becomes aware of additional information and/or finds that any portion of the submitted information is false, misleading or misrepresents the truth, the company must promptly notify EPA. If any part of the company's response is found to be untrue, the signatory and the company may be subject to criminal prosecution.

If desired, the company may assert a business confidentiality claim covering all or part of the information requested by this letter. The claim must be supported by each of the four factors specified in Section 104(e)(7)(E) of CERCLA, 42 U.S.C. §9604(e)(7)(E), and must be asserted at the time of submission, by placing on (or attaching to) the information a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret", or "proprietary", or "company confidential". Information covered by such a claim will be disclosed by EPA only to the extent and by means of procedures set forth in Title 40 C.F.R. Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to the company.

If you have any questions concerning this "Request for Information", please contact Silvina Fonseca, of my staff, at (212) 264-7604 or Bruce Aber, Assistant Regional Counsel, at (212) 264-5547. Please note that all communications from an attorney must be directed to Bruce Aber. Your cooperation is appreciated.

Sincerely yours,

for Kathleen C. Callahan, Director
Emergency and Remedial Response Division

Enclosures

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

1. A complete separate response must be made to each individual question in this "Request for Information".

2. Precede each answer with the number of the question to which it is addressed.

3. In preparing your response to each question, consult with all current and former employees and agents of the company who may be familiar with the matter to which the question pertains.

4. Interpret "and" as well as "or" to include within the scope of the question as much information as possible. If two interpretations of a question are possible, use the one that provides more information.

5. If you are unable to give a detailed and complete answer or to provide any of the information or documents requested, indicate the reasons for your inability to do so.

6. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name, last known address and phone number, and the reasons for your belief.

7. For each document produced in response to this "Request for Information", indicate on the document, or in some other reasonable manner, the number of the question to which it applies.

8. If anything is deleted from a document produced in response to this "Request for Information", state the reason for, and the subject matter of, the deletion.

9. If you are unable to provide a copy of any document, identify the document by describing the nature of the document (e.g., letter, file memorandum, invoice, inventory form, billing record, hazardous waste manifest, etc.) and provide an explanation as to why a copy of the document cannot be produced. Describe the relevant information therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is otherwise unavailable.

10. Whenever in this "Request for Information" there is a request to identify a person or an entity other than a person, state the person or entity's full name, last known employment, present or last known home address, and telephone number.

11. As used herein, the term "release" and "person" shall have the meaning set forth in Section 101(22), and (21) of CERCLA, 42 U.S.C. §9601(14), and (21), respectively.

12. As used herein, the terms "disposal" and "storage" shall have the meanings set forth in Sections 1004(3) and (33) of RCRA, 42 U.S.C. §6903(3) and (33), respectively.

13. As used herein, the term "industrial waste" shall mean any solid, liquid, gas, or sludge or any mixtures thereof which possess any of the following characteristics:

a. it contains one or more "hazardous substances" (at any concentration) as defined in 42 U.S.C. §9601(14);
b. it is a "hazardous waste" as defined in RCRA 42 U.S.C. §6903(5);
c. it has a pH less than 2.0 or greater than 12.5;
d. it reacts violently when mixed with water;
e. it generates toxic gases when mixed with water;
f. it easily ignites or explodes;
g. it is an industrial intermediate waste product;
h. it is an industrial treatment plant sludge or supernatant;
i. it is an industrial byproduct having some market value;
j. it is coolant water or blowdown waste from a coolant system;
k. it is a spent product which could be reused after rehabilitation;
l. it is any material which you have reason to believe would be toxic if either ingested, inhaled or placed in contact with your skin; or
m. it is used product, primarily derived from petroleum (e.g., fuel oils, motor oils, gear oils, cutting oils, transmission fluids, hydraulic fluids, and dielectric fluids).

14. As used herein, the term "raw material" or "product" means hazardous substance for a productive use.

15. As used herein, the terms "drum" or "container" include, but are not limited to, drums, vats, pails, carboys, boxes, tanks, tank trucks, kettles, barrels, cans, bulk solids, bottles and cylinders.

16. As used herein, the term "you", "your", "company", "entity" and similar terms shall mean any person as defined in Section 101(21) of CERCLA ("Person"), and shall include all past and present facilities and employees of your corporation, its subsidiaries, parent company, divisions, affiliates, and branches of the corporation, unless its meaning is otherwise explicitly redefined in any specific question.

17. As used herein, the term "White Chemical Corporation" or the "Site" shall refer to a parcel of property identified as Block 3782, Lot 109 on the tax map of Essex County, located at or about 660 Frelinghuysen Avenue, Newark, New Jersey.

18. In answering these questions, every source of information to which you have access should be consulted, regardless of whether the source is in your immediate possession or control. All documents or other information, including records of all types of manufacturing, treatment, transportation or disposal operations, in your possession or in the possession of the company should be consulted. If you do not have access to certain information and/or documents, state the nature of this information and/or document(s), and indicate in whose possession they can be found.

19. For each of the following questions, send copies of all documents that relate to the question.

REQUEST FOR INFORMATION

1. a. State the legal name of the entity ("Entity") responding to this "Request for Information," as that term is defined in instruction number 16.

   b. If you are a commercial entity:

      1) Identify by name, address, nature of business operation, dates of operation, the Entity including, but not limited to parent, subsidiary, affiliate, division or any business unit which is now, or was during the period 1982 through September 1990, related to your Entity, which generated, transported, disposed of, supplied and/or sold any industrial waste, as that term is defined in instruction number 13, raw material or product, as those terms are defined in instruction 14, during the period 1982 through September 1990. If any entity identified above did business under more than one name, each name should be stated with the response to this question.

      2) Identify the state of incorporation and the agents for service of process in the state of incorporation for every entity identified above.

      3) State the name(s) and address(es) of all past and present officers of your Entity and related entities and the individual(s) responsible for environmental programs and compliance in the entities identified above, for the period 1982 to September 1990.

   c. If you are a Person, other than a commercial entity, state all the locations, with addresses, from which you or your agents generated, transported, disposed of, supplied to, and/or sold any industrial waste materials raw materials, or product during the period 1982 to September 1990.

2. Respond to the following question by checking the YES or NO Column as applicable to the White Chemical Corporation Site.

   During the period 1982 through September 1990, has the Entity or any related entity generated, arranged for the generation of, transported, or arranged for the transportation of, sold, arranged for the selling of, and/or supplied:

		YES	NO
a.	Commercial refuse*	___	___
b.	Industrial waste	___	___
c.	Petroleum or petroleum products	___	___
d.	Raw material/Product	___	___
e.	Finished chemicals	___	___
f.	Chemical waste of any type	___	___
g.	Hazardous waste of any type	___	___
h.	Hazardous waste containers (e.g., drums)	___	___
i.	Pesticides	___	___
j.	Construction and demolition waste	___	___
k.	Industrial sludge	___	___
l.	Chemical solvents	___	___
m.	"CERCLA WASTE MATERIAL"; i.e., any solid, liquid, or sludge, or any mixtures thereof which possess any of the characteristics defined in #14 of the Instructions	___	___

---

* Commercial refuse includes any waste material that was generated at and/or transported from a business which was not involved in manufacturing operations.

3. For each item marked YES state the nature of the operations and processes which were conducted at each Entity or by any Person generating, transporting and/or selling any industrial waste, listed in response to question 1 above, for each year from 1982 to September 1990.

4. If you answered YES to any item in question 2 above:

   a. Identify by name, composition, quantity, and source of origin, each substance identified in question #2, which was generated, transported to, disposed of, sold and/or supplied to, or which you have reason to believe was generated, transported to, disposed of, sold, and/or supplied to the White Chemical Corporation, Newark, New Jersey. For each material, identify the entity which generated, transported, disposed of, sold and/or supplied such material.

   b. If your Entity or any related entity generated material identified in question #4(a), identify by name, address, specific dates of service and total billings for each year of service, the haulers that transported, or may have transported, the aforesaid material to the White Chemical Corporation during the period of 1982 through September 1990.

   c. Identify by name, composition, and source of origin, each material transported to, or which you have reason to believe was transported to the White Chemical Corporation. For each, state whether your Entity, or any related entity transported such material.

   d. If your Entity or any related entity transported the material identified in question #4(a), state the total quantity of material transported and identify by name, address, specific dates of service and total billings for each year of service, the generators of the material you transported, or may have transported to White Chemical Corporation during the period 1982 through the present. For quantity totals for liquids, the answer should be in terms of volume, for solid material, in terms of weight.

   e. Explain how the material was containerized for handling and transporting (e.g., drums, bulk solids, tank trucks, bulk liquids (uncontainerized), etc.).

   f. Please state whether your Company purchased from White Chemical Corporation any product which was manufactured from any of the materials you identified in 2 above?

5. Does your Company have any past or present "toll processing" or "toll manufacturing", conversion arrangements, third party contracts, consignments, or other arrangement with White Chemical Corporation, Newark, New Jersey, D & O Chemicals, Inc., Englewood, New Jersey, or Hexagon Enterprises, Inc., Mountain Lakes, New Jersey? If so, identify the purpose or nature of each arrangement. Also describe how each arrangement provided for the generation, transportation, storage, or disposal of any of the material identified in question #4 above, and provide documentation.

6. Has your Company ever had an ownership interest in any items affirmatively identified in question #2 above, while they were being stored at the Site during the years 1982-1990 which has not been fully described pursuant to question 5 above. If so, describe the nature of your ownership interest, your company's arrangements with White Chemical, and how each arrangement provided for the generation, transportation, storage, or disposal of the materials and provide documentation.

7. If you answered YES to any item in question 2 above, please answer the following:

   a. For each entity, listed in response to question 1 above, state whether there was any treatment system, the type of system, the years in operation, the volume and nature of the material treated and the volume and chemical constituents of the sludge, waste water and other by-products produced on an annual basis for the years 1982 through September 1990.

   b. What amount and percentage of the total waste listed in response to this question was transported and/or sold to the White Chemical Corporation each year during the period 1982 through September 1990? _

   c. Were analyses performed on the sludge, waste waters and/or other by-products? If so, state the results.

8. If you answered YES to question 4, 5, 6 or 7 above, identify by name, job title and description, address, and year(s) of service, all individuals having knowledge of the generation, treatment, storage, transportation, disposal and marketing of waste material by any Person listed above for the period 1982 through September 1990.

9. Has your Company ever had any authority to participate in or influence White Chemical Corporation's management, waste disposal or financial operations? If so, describe any such authority and supply all documents which relate to such authority.

10. Has your Company ever actually participated in or influenced White Chemical Corporation's management, waste disposal, or financial operations? If so describe any such participation and supply all relevant documents. Include, but do not limit your response to, all instances where the Company specified to White Chemical Corporation the process to be used in White Chemical Corporation's production of a finished product.

11. Has your Company ever performed or contracted to have performed any site inspections or investigations of the White Chemical Corporation Site or any aspect of White Chemical Corporation's operations? If so,

    a. list the dates of the inspection(s),
    b. describe the purposes for and results of the inspection(s),
    c. supply copies of any documents which contain results or analyses of the inspection(s), and
    d. state the names of any officers, employees, contractors, consulting companies, or other persons who assisted in performing the inspection(s).

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of _____

County of _____ ____:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, 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, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that the Corporation is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the Corporation's response thereto should become known or available to the Corporation.

_____
NAME (print or type)

_____
TITLE (print or type)

_____
SIGNATURE

Sworn to before me this

day of , 19__

_____
Notary Public

TO: Distribution

TGG: JGL: PET: AC: AJO: RF
XF: Desk

FROM: T. G. Grumbles
DATE: August 7, 1991

Interoffice Communication

VISTA

SUBJ: **NEARLY ANNUAL SAFETY DIRECTORS MEETING**

As planned, the meeting will be held on Tuesday, September 10, in Houston. It will be a one-day meeting. The primary focus of the meeting will be on the Safety and Health Audit Program. We will be doing training on how to use the audit system. Below are the preliminary agenda items. Please contact me with other thoughts on the agenda content.

1. Health and Safety Audit Program: content, administration, and how to use training.

2. Process Safety Update: Eric Meyer will give a status report on Vista's efforts.

3. Responsible Care Update and Issues.

4. Regulatory and Health Hazard Updates.

A more detailed agenda will be sent prior to the meeting. Once again, please provide me with your comments and thoughts on additional agenda items.

T Grumbles

dlj

Distribution: SAFETY DIRECTORS

Bruce Trego-Aber, Brent White-Balt, George Williams-Blane, Matt Tonkovich-Hmd, K. L. Fogg-LCCP, R. V. Gantz-LCLAB, Mike Lunsford-LCVCM, Mark Markerson-Okc, Greg Lipps-Premiere, R. B. Martin-Austin, J. R. Drumwright, J. G. Farrier

cc: PLANT MANAGERS

R. W. Seymour-Aber, L. R. Bauer-Balt, G. D. Williams-Blane, J. Pavao-Hmd, J. Friend-LCCP, J. W. Ware-LCLAB, P. Carrico-LCVCM, H. D. Garrison-Okc, P. L. Foote-Prem, V. W. Weiss-Austin

R. D. Gamblin, T. H. Huffman, A. Clark, E. Meyer

VVV 000007508

TO: R. D. Gamblin

FROM: T. G. Grumbles
DATE: August 9, 1991

Interoffice Communication

SUBJ: CIIT PARTICIPATION AND COSTS

TGG:JCL:FGJ:AC:AJO:RF

VISTA

I've attached a memo from 1988 regarding CIIT membership. The dues structure is essentially the same except that a discount factor of approximately 0.80 is now applied to dues. This is a result of increasing membership. The membership list has increased from 32 companies in 1988 to 50 today. A current membership list is attached. I believe our dues would be in the range of 100,000 to 110,000 for the first year.

The remainder of the information in the 1988 memo is current.

T. G. Grumbles

dlj

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