

A photograph of an industrial facility with several tall smokestacks and complex piping structures. A large, bright full moon is visible in the dark sky behind the facility.

# FAILURE TO ACT:

NEW JERSEY JOBS AND COMMUNITIES ARE STILL  
AT RISK FROM TOXIC CHEMICAL DISASTER



A Report from the  
New Jersey Work Environment Council  
October 2013



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WEC gratefully acknowledges financial support for our chemical safety and security project and for this report from the Fund for New Jersey, the Public Welfare Foundation, and the Environmental Endowment of New Jersey, as well as our member organizations.

WEC is an alliance of 70 labor, community, and environmental organizations working together for safe, secure jobs and a healthy, sustainable environment. WEC links workers, communities, and environmentalists through training, technical assistance, grassroots organizing, and public policy campaigns to promote dialogue, collaboration, and joint action. WEC is affiliated with the National Council for Occupational Safety and Health and the BlueGreen Alliance.

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*Cover photo: Chemical leak from Conrail train derailment in Paulsboro, NJ, November 2013.*

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## **NEW JERSEY JOBS AND COMMUNITIES ARE STILL AT RISK FROM TOXIC CHEMICAL DISASTER**

Sponsors of this report by the New Jersey Work Environment Council (WEC) are 15 organizations representing chemical facility and oil refinery workers, firefighters and other first responders, emergency room nurses, government environmental protection staff, educators, community members, faith leaders, environmental justice advocates, and environmental leaders:

- United Steelworkers District 4
- International Brotherhood of Teamsters Local 877
- Professional Firefighters Association of NJ
- Health Professionals and Allied Employees
- Communications Workers of America District 1
- American Federation of Teachers New Jersey
- Ironbound Community Corporation
- Paulsboro Action Committee
- Concerned Citizens Coalition of Long Branch
- New Jersey Environmental Justice Alliance
- NY/NJ Baykeeper
- GreenFaith
- New Jersey Public Interest Research Group
- Clean Water Action
- Sierra Club – New Jersey Chapter

**OCTOBER 2013**

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## SUMMARY OF KEY FINDINGS AND RECOMMENDATIONS

**New Jersey jobs and communities are still at risk from toxic chemical disaster – five years after the NJ Department of Environmental Protection (DEP) under former Governor Jon Corzine adopted rules to implement the NJ Toxic Catastrophe Prevention Act that were supposed to drastically reduce that risk.**

**Management at potentially hazardous facilities has too often not acted in good faith to carry out the intent of the safeguards.**

**Governor Christie has failed to act to protect public safety.**

These are the conclusions of the following review by the NJ Work Environment Council (WEC) of 42 publicly available reports submitted to DEP under the regulations. WEC is a nonpartisan advocate for worker and public health and safety and, along with its member organizations, was a leading proponent of the Toxic Catastrophe Prevention Act and the rules issued by DEP to implement the law.

The essential purpose of the rules was to protect the residents and workers of New Jersey from a catastrophic release of toxic chemicals or deliberate attack on facilities that handle those chemicals. The DEP safeguards called on facilities to review options for implementing “inherently safer technology” (IST) – replacing extraordinarily hazardous substances with safer ones or adopting safer production processes.

The rules require those facilities to identify feasible alternatives and provide a schedule for implementation. If a facility found that an alternative was not feasible, it had to explain why. This information was to be available to the public so communities and workers would know what was or wasn’t being done to protect them.

### Key Findings

- **A failure to act puts workers and the public at risk.** New Jersey’s high population density places millions of people at potential risk from a toxic incident. New Jersey is the most densely populated state in the country, nestled between New York City and Philadelphia, and has one of the highest ratios of toxic facilities per square mile in the nation.<sup>1,2</sup> Approximately 12,000 workers are employed by these facilities (not including McGuire Air Force Base).

Yet, 90 New Jersey facilities still use large quantities of highly hazardous chemicals that pose a potential catastrophic safety and health risk to workers and/or the public if there were a worst-case toxic release caused by an incident or deliberate attack. These facilities are located in 19 of New Jersey’s 21 counties. They include chemical plants, oil refineries, sewage and water treatment works, bulk chemical handling and storage terminals, and food processing facilities.

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<sup>1</sup> US Census Bureau, State Population Tables available at:

<http://www.census.gov/compendia/statab/2012/tables/12s0014.pdf>.

<sup>2</sup> Toxic Release Inventory (TRI), US EPA. This statistic is based on 2011 reports under the TRI Program, which covers 401 New Jersey facilities. TRI data is available at:

<http://www.epa.gov/enviro/facts/tri/search.html>.

There are five New Jersey facilities at which a worst-case release of toxic chemicals could place at risk any of more than two million people living in the vulnerability zone. These facilities include chemical manufacturers and an oil refinery. Each of these facilities could eliminate or significantly reduce the use of extraordinarily hazardous substances by producing the chemical on-site as needed, completely replacing the chemical, or using a diluted form of the toxic chemical.

*A worst-case chemical release from the potentially most hazardous of these facilities, located in Hudson County, could harm up to an estimated 12 million people in New Jersey and large portions of New York City. Another facility, located in Salem County, reported that a potential release could harm over four million residents and extend 25 miles into downtown Philadelphia.*

There are 10 New Jersey facilities at which a worst-case release of toxic chemicals could place at risk 100,000 or more people. These facilities are located in Gloucester, Hudson, Middlesex, Salem, and Union counties.

The most dangerous chemicals reported by New Jersey's top 15 high-hazard facilities are chlorine, hydrofluoric acid, anhydrous ammonia, hydrogen chloride, ethylene oxide, and titanium tetrachloride. Each of these toxic chemicals, under certain conditions, can form a highly hazardous cloud that can drift downwind, enveloping neighborhoods, schools, hospitals, adjacent industrial facilities, or other public areas. Three of the top five facilities report chlorine gas as their most acutely hazardous chemical.

- **Failure to consider safer alternatives as required.** WEC reviewed the 42 publicly available reports submitted by facilities under the IST rule. Many failed to identify industry-proven solutions for hazardous chemicals and processes. Of the nine facilities that claimed that options were economically infeasible, seven failed to provide the required quantitative analyses.<sup>3</sup> None of the reports accounted for economic *benefits* from preventing large-scale toxic exposures.
- **Stonewalling.** About half of the facilities that submitted reports took advantage of a loophole in the regulations that allows management to block public disclosure of the safety information contained in the report. For example, the potentially most dangerous facility in the state, Kuehne Chemical, which processes chlorine, chose to keep its reports confidential. Thus, residents remain in the dark about which safer technologies or substances have been adopted, if any.
- **Lack of enforcement.** The Christie administration has turned a blind eye to facilities that are not switching to safer chemicals and processes. In fact, DEP has not been provided enough staff to fully review many of the required facility reports in order to assess compliance.
- **Alternatives available.** More than one-third of the facilities are using one of three toxic chemicals – chlorine, hydrofluoric acid or anhydrous ammonia – that have industry-proven alternatives. Water treatment plants, and their suppliers, could completely reduce the risk

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<sup>3</sup> They are Bayonne Plant Holdings, Cape May MUA, McLane Company, PSEG Fossil - Hudson Station, PSEG Fossil - Mercer Station, Readington Farms, and Ocean Spray.



from chlorine with safer chemicals and processes. Hydrofluoric acid can be substituted or diluted by refineries and chemical plants that use it to make workers and communities safer. The EPA has identified alternative refrigerants to replace anhydrous ammonia for food processing, and power plants can use less hazardous aqueous ammonia or urea to prevent smog pollution.

- **Progress by some.** Some facilities have complied with the safeguards and made their surrounding communities safer. For example, nearly 300 water and wastewater treatment plants that formerly used highly dangerous chlorine have switched to safer processing methods using UV radiation, ozone, or sodium hypochlorite for disinfection.

### **Recommendations**

It is clear that many facilities will not switch to safer chemicals or processes without stronger action by DEP. Unfortunately, the Christie administration has not shown a commitment to putting worker and community safety first.

As explained later in more detail, Governor Christie should direct DEP to change its rules to:

1. **Prevent facility management from declaring their IST reviews as secret.**
2. **Require facility management to better document their claims that adopting safer chemicals and technologies is not feasible.**
3. **More clearly define “inherently” safer options.**
4. **Provide opportunity for meaningful community involvement.**
5. **Ensure that Local Emergency Plans truly inform neighbors.**
6. **Require minimum facility staffing levels necessary for effective preventive maintenance and emergency shutdowns and response.**
7. **Produce an annual report drawing public attention to safer chemicals and processes identified and adopted by facilities, as well as many facilities’ failure to do so.**

Governor Christie should also:

8. **Provide additional staff and resources for DEP’s Toxic Catastrophe Prevention Program to ensure effective enforcement of the law’s requirements.**
9. **Conduct a comprehensive review of county emergency response plans and a capacity assessment for each county.**
10. **Direct DEP to withdraw its “waiver rule” that allows the agency not to enforce certain provisions of the Toxic Catastrophe Prevention Act.**

The US Environmental Protection Agency (EPA) should:

11. **Use its authority under the Clean Air Act to issue new rules and guidance that require high hazard facilities to prevent catastrophic consequences to workers and communities in the event of an accident or terrorist attack by adopting feasible safer chemical processes or other inherently safer technologies.**

## ABOUT THIS REPORT: PUBLIC INFORMATION THAT ENCOURAGES FACILITIES TO PROTECT PUBLIC SAFETY

This report updates WEC's 2008 report, *Still at Risk: Protecting Our Jobs, Families, and Hometowns from Toxic Chemical Disasters*.

The report uses publicly available data developed and provided by facility management to DEP under the state's *Toxic Catastrophe Prevention Act* (TCPA) program as of June 12, 2013 and to the US EPA under federal *Clean Air Act* (CAA) Section 112 (r), as of August 27, 2013.

Some corporate executives have argued in the past that this publicly available information ought to be withheld from local residents and health and safety watchdogs because terrorists could use it to plan attacks on facilities that use extraordinarily hazardous substances.

**This argument stands reality on its head.** The way to protect our communities from catastrophic disasters or deliberate attacks is to replace hazardous substances and processes as the law intended – not to leave these preventable hazards in place and then keep the public in the dark.

Every year, chemical releases, fires, and explosions claim lives and threaten residents' health across the nation. On November 30, 2012 for example, nearly 700 New Jersey residents were evacuated and at least 100 were sickened when more than 23,000 pounds of highly toxic, cancer-causing vinyl chloride (VC) spread through the working class and low-income town of Paulsboro, Gloucester County, after a train derailment.

This disaster raised many issues concerning Conrail's practices and local emergency preparedness. But it also highlighted the need to replace extremely hazardous substances, such as vinyl chloride, so they would not be transported through communities in the first place. As the Association of American Railroads has said:

*"We can no longer continue to risk the lives of millions of Americans by using, transporting and storing highly toxic chemicals when there are safer alternatives commercially available. It is time for the nation's big chemical companies to stop making the dangerous chemicals that can be replaced by safer substitutes or new technologies currently in the marketplace."*<sup>4</sup>

Both TCPA and CAA require facilities that use large quantities of extraordinarily hazardous substances to develop comprehensive Risk Management Plans (RMPs).<sup>5</sup> RMPs are designed to protect workers and communities by preventing catastrophic toxic and flammable releases. These plans cover standard operating procedures, safety reviews, preventive maintenance,

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<sup>4</sup> Association of American Railroads, "Homeland Security Committee Urged to Consider Safer Chemicals; Chemical companies should stop manufacturing extremely dangerous chemicals," Press Release, February 27, 2008.

<sup>5</sup> TCPA covers facilities if they handle, use, manufacture, store or have the capability of generating an "extraordinarily" hazardous substance at certain specified quantities. For a list of these substances, see *Toxic Catastrophe Prevention Act, Section 7:31-6.3, Table 1A*. CAA Section 112 (r) covers a very similar, though slightly different, universe of facilities using "extremely" hazardous substances. For a list of these substances, see EPA, Office of Solid Waste and Emergency Response, *List of Lists: Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-To-Know Act (EPCRA)* and Section 112(r) of the Clean Air Act: *CEPCRA Section 302, Extremely Hazardous Substances*. [http://www.epa.gov/osweroe1/docs/chem/list\\_of\\_lists\\_revised\\_7\\_26\\_2011.pdf](http://www.epa.gov/osweroe1/docs/chem/list_of_lists_revised_7_26_2011.pdf).



operator training, accident investigation, risk assessment, emergency response, and management of changing conditions. Under TCPA, management must also evaluate whether they can adopt “inherently safer technology” (IST). Unfortunately, facilities are not actually required to adopt *feasible* IST. The deadline for initial IST review submissions to DEP was September 2, 2008. IST reports are to be updated every five years with RMP updates thereafter.<sup>6</sup>

TCPA and CAA Section 112 (r) also require RMP information to be publicly available. Prior to September 11, 2001, much of this data was available online. However, interested parties must now visit federal and state “reading rooms” to review complete RMPs. This report is based on WEC’s review of these records.<sup>7</sup>

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<sup>6</sup> Deadlines for submission to DEP were dependent on designated facility classification code. For more information on this, see Appendix B: Background on Chemical Security Policies in New Jersey.

<sup>7</sup> For this report, WEC visited EPA’s Reading Room in Edison and DEP’s TCPA program Reading Room in Trenton.

## “WORST CASE” POTENTIAL OF FACILITIES IN NEW JERSEY

The table below ranks New Jersey facilities by population size living within the area where a worst-case toxic or flammable release could potentially cause death or serious injury. *This data does not mean that all people in the danger (vulnerability) zone would be seriously injured or killed.* No one would know how many were affected until it was too late. However, this data, submitted by facility management, does reflect the potential magnitude of the threat.

**Table 1: “Worst Case” Potential of Facilities in New Jersey**

	Facility Name	Location	Extraordinarily Hazardous Substance	Danger Zone*	Population in Danger Zone	Employees at Facility
1	Kuehne Chemical Co., Inc.	South Kearny	Chlorine	14.00	12,000,000	62
2	Solvay Solexis	West Deptford	Hydrofluoric acid	25.00	4,165,831	178
3	Infineum USA L.P.	Linden	Chlorine	14.00	4,000,000	251
4	Paulsboro Refining Company	Paulsboro	Hydrofluoric acid	19.00	3,226,688	452
5	DuPont Chambers Works	Deepwater	Chlorine	25.00	2,000,000	850
6	DuPont Performance Polymers - Chambers Works	Deepwater	Hydrogen chloride (anhydrous)	13.00	500,000	99
7	Equistar Chemicals, LP (frm. Basell, Inc.)	Edison	Titanium tetrachloride	6.20	422,628	70
8	Hercules Inc.	Parlin	Ethylene oxide	5.50	250,000	75
9	Ferro Delaware River Plant	Bridgeport	Chlorine	7.50	240,000	91
10	Bayonne Plant Holding LLC	Bayonne	Ammonia (anhydrous)	2.13	112,728	14
11	Farmland Dairies	Wallington	Ammonia (anhydrous)	1.20	54,000	330
12	Avantor Performance Materials	Phillipsburg	Ammonia (anhydrous)	2.30	52,535	264
13	Veeco Instruments, Inc.	Somerset	Ammonia (anhydrous)	2.88	51,094	***
14	CVC Specialty Chemicals, Inc.	Maple Shade	Epichlorohydrin	2.20	43,297	40
15	State Metal Industries, Inc.	Camden	Chlorine	1.30	34,104	80
16	Nestle USA – Beverage Division, Inc.	Freehold	Ammonia (anhydrous)	1.70	21,000	209
17	Phillips 66 (frm. Conoco Phillips)	Linden	Flammable Mixture	1.40	18,000	830
18	BASF Corporation	Washington	Ethylene oxide	3.58	17,334	66
19	**Passaic Valley Water Commission - Little Falls Water Treatment Plant (WTP)	Totowa	Ozone	1.4	16,500	90
20	Bridor	Vineland	Ammonia (anhydrous)	2.60	11,639	30
21	Kinder Morgan	Carteret	Vinyl acetate monomer	1.20	10,769	145
22	**E.I. Dupont Morses Mill - Sulfuric Acid Plant	Linden	Sulfur trioxide	1.39	10,400	30
23	Grasso Foods, Inc.	Woolwich Township	Ammonia (anhydrous)	3.10	10,000	47
24	**IQE RF LLC	Somerset	Arsine	1.6	8,400	70
25	Garelick Farms, LLC-Florence	Florence	Ammonia (anhydrous)	1.25	7,463	150
26	Lubrizol Advanced Materials, Inc.	Pedricktown	Acrylonitrile	3.10	7,100	40
27	Brick Township Municipal Utilities Authority	Brick	Chlorine	0.90	6,794	130
28	Tropicana Northeast Operations	Jersey City	Ammonia (anhydrous)	0.66	6,400	142
29	**Ocean Spray Cranberries	Bordentown	Ammonia (anhydrous)	0.87	5,869	255

30	Johanna Foods, Inc.	Flemington	Ammonia (anhydrous)	1.50	5,859	585
31	New Jersey American Water - Delaware River Regional WTP	Delran	Chlorine	0.90	5,600	25
32	New Jersey American Water - Jumping Brook WTP	Neptune	Chlorine	0.90	4,900	14
33	IMTT	Bayonne	Butane	0.48	4,600	290
34	Fisher Scientific Company LLC	Bridgewater	Chloroform	0.70	3,600	175
35	W.R. Grace and Company	Edison	Titanium tetrachloride	0.90	3,200	30
36	**Readington Farms	Whitehouse	Ammonia (anhydrous)	1.2	3,137	217
37	McGuire Air Force Base	McGuire AFB	Chlorine	0.3	2,907	10,000
38	Johnson Matthey Inc.	West Deptford	Chlorine	1.30	2,700	400
39	New Jersey American Water - Swimming River WTP	Colts Neck	Chlorine	0.90	2,600	20
40	Seabrook Brothers & Sons Inc.	Seabrook	Ammonia (anhydrous)	1.20	1,900	300
41	Siegfried USA	Pennsville	Thionyl Chloride	0.83	1,300	190
42	Oxy Vinyls, LP	Pedricktown	Ammonia (anhydrous)	1.80	1,138	45
43	City of Newark - Pequannock WTP	West Milford	Chlorine	1.30	1,100	21
44	Aeropres Corporation	Hillsborough	Butane	0.50	700	8
45	Voltaix LLC	North Branch	Diborane	0.80	699	100
46	**Stapan Company	Fieldsboro	Sulfur trioxide	1.07	564	56
47	Sunoco Partners Mktg. & Terminals Eagle Point Terminal	Westville	Butane	0.50	555	20
48	McLane Distribution Services	Carneys Point	Ammonia (anhydrous)	1.40	501	468
49	Benjamin Moore & Company	Newark	Vinyl acetate monomer	0.25	490	87
50	Trenton Water Works	Trenton	Chlorine	0.20	446	32
51	Dow Chemical	Pennsauken	Pentane	0.40	434	28
52	DuPont	Parlin	Acrylonitrile	0.43	383	290
53	South Jersey Terminal	Bridgeton	Flammable Mixture	0.50	277	6
54	The Muralo Company	Bayonne	Vinyl acetate monomer	0.10	155	100
55	Casa Di Bertacchi Corporation	Vineland	Ammonia (anhydrous)	0.60	140	95
56	**Linde Gas North America (Spectra Gases)	Alpha	Nitrogen Trifluoride	0.35	137	138
57	Hess Corporation	Port Reading	Butane	0.18	134	40
58	Crest Foam Industries Inc.	Moonachie	Toluene diisocyanate	0.10	84	65
59	LaBrea Bakery	Swedesboro	Ammonia (anhydrous)	0.65	31	366
60	Mexichem Specialty Resins	Pedricktown	Vinyl chloride	0.22	30	72
61	Falcon Safety Products, Inc.	Somerville	Difluoroethane	0.28	10	97
62	Diversified CPC Intl., Inc.	Sparta	Propane	0.42	10	4
63	**Rust-Oleum Corporation	Somerset	Reactive Mixture	0.15	8	80
64	American Spraytech LLC	North Branch	Butane	0.20	8	75
65	Coim USA, Inc.	West Deptford	Toluene diisocyanate	0.40	5	75
66	Rinchem Company Inc.	Flemington	Hydrochloric acid	0.31	3	13
67	Church & Dwight Company Inc. (frm. EMC Packaging)	Lakewood	Flammable Mixture	0.28	0	300
68	VWR International, LLC	Bridgeport	Hydrochloric acid	0.26	0	200
69	Reckitt Benckiser	Belle Mead	Flammable Mixture	0.12	0	72
70	Dolco Packaging (Tekni-Plex,	Branchburg	Difluoroethane	0.02	0	130

Inc.)						
71	PSEG Fossil, LLC	Hamilton	Aqueous ammonia	0.10	0	128
72	PSEG Fossil, LLC - Hudson Generating Station	Jersey City	Aqueous ammonia	0.10	0	123
73	**Mobil Gas Company	Edison	Di-tert-butyl-peroxide	0.24	0	100
74	**New Jersey American Water - Canoe Brook Station WTP	Short Hills	Ozone	0.29	0	98
75	**United Water New Jersey	Haworth	Ozone	0.05	0	88
76	Elan Incorporated	Newark	Ethyl chloride	0.30	0	80
77	FXI (Foamex Innovations)	East Rutherford	Toluene diisocyanate	0.01	0	75
78	Cogen Technologies	Linden	Aqueous ammonia	0.20	0	60
79	Carneys Point Generating Co.	Carneys Point	Aqueous ammonia	0.09	0	53
80	Logan Generating Co., L.P.	Swedesboro	Aqueous ammonia	0.07	0	51
81	Deltech Resin Company	Newark	Toluene diisocyanate	0.10	0	22
82	COIM USA, Inc. (frm. Air Products & Chemicals)	Paulsboro	Toluene diisocyanate	0.02	0	18
83	**New Jersey American Water - Canal Road Station WTP	Somerset	Ozone	0.1	0	16
84	Cape May Municipal Utilities Authority	Rio Grande	Chlorine	0.55	0	16
85	Brook Warehousing Corporation	Bridgewater	Phosphorus oxychloride	0.03	0	14
86	Welco Acetylene - Newark	Newark	Acetylene	0.03	0	14
87	Air Liquide America Specialty Gases, LLC	South Plainfield	Chlorine	0.20	0	13
88	Sunoco Partners Mktg. and Terminal LP Newark NJ	Newark	Butane	0.50	0	7
89	PSEG Linden LPG Storage Facility	Linden	Propane	0.52	0	0
90	Cardolite Corporation	Newark	Epichlorohydrin	0.04	0	70

\*\*\*21,465

\* The danger zone is a radius measured in miles from the facility.

\*\* Facility regulated under NJ Toxic Catastrophe Prevention Act but not federal Clean Air Act.

\*\*\* Veeco Instruments has claimed "confidential business information" for the number of its employees on site in its RMP report.

Source: Review of Risk Management Plans (RMPs) filed under Section 112 (r) of the federal Clean Air Act as of August 27, 2013, and under the NJ Toxic Catastrophe Prevention Act as of June 12, 2013. The number of employees within a facility is provided by facility management. Reports do not include employees of on-site contractors and employees of neighboring facilities in off-site consequence calculations. Cumulative figures are not given for residential population because offsite facility vulnerability zones overlap.

## DISTRIBUTION OF FACILITIES BY COUNTY

Every New Jersey County, with the exceptions of Atlantic and Morris, has at least one facility regulated by DEP's NJ Toxic Catastrophe Prevention Program or the EPA under *Clean Air Act* Section 112(r).

The distribution of these facilities by county is shown in Table 2, below.

**Table 2: Distribution of Facilities by County**

ATLANTIC	0
BERGEN	4
BURLINGTON	6
CAMDEN	2
CAPE MAY	1
CUMBERLAND	4
ESSEX	8
GLOUCESTER	11
HUDSON	6
HUNTERDON	3
MERCER	2
MIDDLESEX	8
MONMOUTH	3
MORRIS	0
OCEAN	2
PASSAIC	2
SALEM	7
SOMERSET	12
SUSSEX	1
UNION	5
WARREN	3

**Total                      90**

## FACILITIES POSING “WORST CASE THREATS” HAVE SAFER OPTIONS

The threat of a catastrophic chemical release remains a major vulnerability for New Jersey. Overall, millions of people remain at risk from 90 facilities located in 19 of our 21 counties. Facilities document this problem through their own reports:

- Three of the top five most potentially dangerous facilities use chlorine, a highly toxic chemical. However, chlorine can instead be produced on site in small quantities to eliminate the chance of toxic exposure to millions of people. Together, these three companies could harm the lives of 18 million people living in the danger zone, including in two major metropolitan areas, New York City and Philadelphia.
- *A worst-case chemical release from the most potentially hazardous of these facilities, Kuehne Chemical, in South Kearny, Hudson County, could cause serious harm in an area where 12 million people live in New Jersey and portions of New York City. A chlorine release from Kuehne could impact a radius extending into Manhattan, Staten Island and Brooklyn, as well as into the Northern New Jersey counties of Hudson, Essex, Bergen, Union and Passaic. The Kuehne website ([www.kuehnecompany.com](http://www.kuehnecompany.com)) has announced plans for a facility upgrade since 2011, yet there has been no visible action at the site. The upgrade would supposedly eliminate the use of railcars for transporting chlorine, and thus dramatically reduce the risk of this facility.*
- The Paulsboro Refining Company in Paulsboro, Gloucester County, uses dangerous hydrofluoric acid, despite availability of several safer alternatives. The company rejected safer alternatives, such as sulfuric acid, claiming a \$200-250 million upgrade would prove too costly. The company also rejected a \$100 million upgrade that would have eliminated off-site risk.<sup>8</sup>

In all, more than one-third of the facilities that filed publicly available reports are using one of three toxic chemicals in applications that have proven alternatives – chlorine, hydrofluoric acid or anhydrous ammonia. Water treatment plants, and their suppliers, could completely reduce the risk from chlorine with safer chemicals and processes. Substitutes for hydrofluoric acid are available, or it can be diluted to make workers and communities safer. EPA has identified alternative refrigerants to replace anhydrous ammonia for food processing, and power plants can use less hazardous aqueous ammonia or urea to prevent smog pollution.

### CHLORINE

Chlorine gas poses great potential for harm to human health through acute (short-term) exposure. It is an extremely corrosive gas that can burn skin, eyes, nose, throat, lungs, even teeth – and exposure can be fatal.<sup>9</sup>

**Table 3: Chlorine “Worst Case Threats”**

	Facility Name	Location	Danger Zone	Population in Danger Zone	Employees at Facility
1	Kuehne Chemical Co., Inc.	South Kearny	14.00	12,000,000	62

<sup>8</sup> Paulsboro Refining Company IST Review Update, May 2010.

<sup>9</sup> Hazardous Substance Fact Sheet: Chlorine, New Jersey Department of Health and Senior Services.



3	Infineum USA L.P.	Linden	14.00	4,000,000	251
5	DuPont Chambers Works	Deepwater	25.00	2,000,000	850
9	Ferro Delaware River Plant	Bridgeport	7.50	240,000	91
15	State Metal Industries, Inc.	Camden	1.30	34,104	80
27	Brick Township Municipal Utilities Authority	Brick	0.90	6,794	130
31	New Jersey American Water - Delaware River Regional WTP	Delran	0.90	5,600	25
32	New Jersey American Water - Jumping Brook WTP	Neptune	0.90	4,900	14
37	McGuire Air Force Base	McGuire AFB	0.3	2,907	10,000
38	Johnson Matthey Inc.	West Deptford	1.30	2,700	400
39	New Jersey American Water - Swimming River WTP	Colts Neck	0.90	2,600	20
43	City of Newark - Pequannock WTP	West Milford	1.30	1,100	21
50	Trenton Water Works	Trenton	0.20	446	32
85	Cape May Municipal Utilities Authority	Rio Grande	0.55	0	16
88	Air Liquide America Specialty Gases, LLC	South Plainfield	0.20	0	13
					<b>12,005*</b>

\* Residential populations are counted based on data from the US Census Bureau. Cumulative figures are not given for residential populations because offsite facility vulnerability zones overlap. The number of employees within a facility is provided by facility management. Reports do not include employees of neighboring facilities in off-site consequence calculations.

Chlorine leaks and fires are a serious safety and health threat to both workers and the public. As a gas, chlorine is stored under pressure and has the potential to leak. Chlorine containers may also explode and release poisonous gases during fires.

In June 2007, Homeland Security Secretary Michael Chertoff asked water and wastewater treatment plants storing chlorine gas to remain vigilant and increase security. Thefts of chlorine tanks had been reported in California and car bombs loaded with chlorine tanks have been used in terror attacks in Iraq. He warned that “...the consequences of ignoring risks...will be quite severe.”<sup>10</sup>

New Jersey chemical manufacturers used over 127 million pounds of chlorine in 2011, according to the state Department of Environmental Protection.<sup>11</sup> An unknown amount also moved through the state’s labyrinth of rail lines – the primary mode of shipping chlorine. In 2010, the Association of American Railroads reported shipping 92,000 carloads of chemicals through New Jersey.<sup>12</sup>

More than any other chemical used in New Jersey, chlorine highlights the dangers of unintentional or intentional chemical incidents.

<sup>10</sup> Carol Eisenberg, “Chertoff Warns Treatment Plants about Chlorine,” *Newsday*, June 12, 2007.

<sup>11</sup> Chlorine use for 2011 as reported to the NJ DEP Right to Know Program.

<sup>12</sup> Association of American Railroads, “Freight Railroads in New Jersey – Rail Fast Facts for 2010,” AAR, May 2012. Nearly half of the chemicals category is ethanol, for which New Jersey is second in the country in rail terminations.

There are many ways to eliminate the dangers of chlorine use. Nearly 300 water and wastewater treatment plants in New Jersey have switched to safer processing methods using UV radiation, ozone, or sodium hypochlorite for disinfection. There are eight facilities currently using chlorine for water and wastewater treatment in New Jersey. Three of them have found feasible options for switching from chlorine gas to safer alternatives. As a result of the required IST review, the Brick Township Municipal Utilities Authority found safer options for water treatment and has committed to timelines to test those options and phase out chlorine gas.<sup>13</sup>

Kuehne Chemical Company, where a worst-case release of chlorine could impact up to 12 million people, stated on its website ([www.kuehnecompany.com](http://www.kuehnecompany.com)) that “Kuehne is pleased to announce the development of a new state-of-the-art brine to bleach facility in South Kearny, NJ. The new facility will utilize the latest inherently safer technology which further demonstrates Kuehne’s commitment to safely and responsibly produce the products that are relied upon by millions of people. Stay tuned for further updates.” There have been no updates since 2011, despite having an on-site chlorine generation process at their Delaware plant. Kuehne Chemical has kept its IST report confidential. However, in 2008, Kuehne management requested \$50 million in public funds to upgrade its facility.

## HYDROFLUORIC ACID

Hydrofluoric acid (HF) is an extremely corrosive chemical that can cause permanent damage to the eyes, skin, and lungs, and prove fatal in some cases. Solvay Solexis and Paulsboro Refining Company, two of the top five potentially most dangerous facilities in New Jersey, use HF.

According to its own estimate, the Paulsboro Refining Company puts the health and safety of up to 3.22 million people at potential risk by continued use of hydrofluoric acid in its alkylation unit to produce gasoline.

Alternatives for hydrofluoric acid are well known in the refining industry. A recent report by the United Steelworkers Tony Mazzocchi Center identified three alternatives, including using sulfuric acid, ionic liquid alkylation, or a solid acid catalyst for the process. While sulfuric acid is less hazardous, it still poses a risk to workers and communities. The ionic liquid alkylation has been successfully used in China with comparable results for the final product, and the solid acid catalyst was documented as a viable option by a consortium of companies in 2004. Both are options that would eliminate the risk to workers and communities from the alkylation process.<sup>14</sup> Paulsboro Refining rejected the sulfuric acid option, claiming the \$200-250 million upgrade was too costly. They also rejected a \$100 million conversion to a modified hydrofluoric acid alkylation process that would have eliminated off-site risk.<sup>15</sup>

Solvay Solexis uses hydrofluoric acid for the manufacture of vinylidene fluoride and other chemicals. Unfortunately, their IST Report was considered confidential under *NJ’s Domestic Security Preparedness Act*, and it is unclear if safer alternatives were considered and if they are feasible.

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<sup>13</sup> WEC Review of IST Reports.

<sup>14</sup> “A Risk Too Great,” United Steelworkers Tony Mazzocchi Center, April 2013.  
<http://assets.usw.org/resources/hse/pdf/A-Risk-Too-Great.pdf>

<sup>15</sup> Paulsboro Refining Company IST Review Update, May 2010.

Both facilities are located in Gloucester County. In New Jersey, hazardous material response teams are organized on a county-wide level and are responsible for responding to a chemical disaster. The recent Paulsboro train derailment and vinyl chloride release demonstrated that the Gloucester County emergency response team did not have the capacity to effectively handle a disaster of this magnitude.

**Table 4: Hydrofluoric Acid “Worst Case Threats”**

	Facility Name	Location	Danger Zone	Population in Danger Zone	Number of Employees
2	Solvay Solexis	West Deptford	25.00	4,165,831	178
4	Paulsboro Refining Company LLC	Paulsboro	19.00	3,226,688	452
					<b>630*</b>

\* Residential populations are counted based on data from the US Census Bureau. Cumulative figures are not given for residential populations because offsite facility vulnerability zones overlap. The number of employees within a facility is provided by facility management. Reports do not include employees of neighboring facilities in off-site consequence calculations.

## ANHYDROUS AMMONIA

Acute ammonia gas exposure can irritate the skin; burn the eyes, causing temporary or permanent blindness; and cause headaches, nausea, and vomiting. High levels can cause fluid in the respiratory system (pulmonary or laryngeal edema), which may lead to death. Anhydrous ammonia is used by more NJ facilities than any other extraordinarily hazardous substance.

**Table 5: Anhydrous Ammonia “Worst Case Threats”**

	Facility Name	Location	Extraordinarily Hazardous Substance	Danger Zone	Population in Danger Zone	Number of Employees	Use
10	Bayonne Plant Holding LLC	Bayonne	Ammonia (anhydrous)	2.13	112,728	14	NOX
11	Farmland Dairies	Wallington	Ammonia (anhydrous)	1.20	54,000	330	R
12	Avantor Performance Materials	Phillipsburg	Ammonia (anhydrous)	2.30	52,535	264	Other
13	Veeco Instruments, Inc.	Somerset	Ammonia (anhydrous)	2.88	51,094	?	Other
16	Nestle USA - Beverage Division, Inc.	Freehold	Ammonia (anhydrous)	1.70	21,000	209	R
20	Bridor	Vineland	Ammonia (anhydrous)	2.60	11,639	30	R
23	Grasso Foods, Inc.	Woolwich Township	Ammonia (anhydrous)	3.10	10,000	47	R
25	Garelick Farms, LLC	Florence	Ammonia (anhydrous)	1.25	7,463	150	R
28	Tropicana Northeast Operations	Jersey City	Ammonia (anhydrous)	0.66	6,400	142	R
29	*Ocean Spray Cranberries	Bordentown	Ammonia (anhydrous)	0.87	5,869	255	R
30	Johanna Foods, Inc.	Flemington	Ammonia (anhydrous)	1.50	5,859	585	R

36	*Readington Farms	Whitehouse	Ammonia (anhydrous)	1.2	3,137	217	R
40	Seabrook Brothers & Sons Inc.	Seabrook	Ammonia (anhydrous)	1.20	1,900	300	R
42	Oxy Vinyls, LP	Pedricktown	Ammonia (anhydrous)	1.80	1,138	45	Other
48	McLane Distribution Services	Carneys Point	Ammonia (anhydrous)	1.40	501	468	R
55	Casa Di Bertacchi Corporation	Vineland	Ammonia (anhydrous)	0.60	140	95	R
60	LaBrea Bakery	Swedesboro	Ammonia (anhydrous)	0.65	31	366	R
72	PSEG Fossil, LLC	Hamilton	Aqueous ammonia	0.10	0	128	NOX
73	PSEG Fossil, LLC - Hudson Generating Station	Jersey City	Aqueous ammonia	0.10	0	123	NOX
79	Cogen Technologies	Linden	Aqueous ammonia	0.20	0	60	NOX
80	Carneys Point Generating Co.	Carneys Point	Aqueous ammonia	0.09	0	53	NOX
81	Logan Generating Co., L.P.	Swedesboro	Aqueous ammonia	0.07	0	51	NOX

**3,932\***

R = Refrigeration Operations NOX = Used to reduce nitrogen oxide emissions in power generation

\* Residential populations are counted based on data from the US Census Bureau. Cumulative figures are not given for residential populations because offsite facility vulnerability zones overlap. The number of employees within a facility is provided by facility management. Reports do not include employees of neighboring facilities in off-site consequence calculations.

Source: Review of Risk Management Plans (RMPs) filed under Section 112 (r) of the federal Clean Air Act as of August 27, 2013, and under the NJ Toxic Catastrophe Prevention Act as of June 12, 2013.

### Food Processing and Storage

Thirteen facilities use anhydrous ammonia for refrigeration to produce milk, yogurt, juice, and to cool grocery store shelves. While many of these facilities are located in more rural areas of New Jersey, such as parts of Gloucester and Cumberland Counties, they collectively include nearly 128,000 people within their vulnerability zones.

Possible alternatives include man-made refrigerants that are not extraordinarily hazardous substances and have been identified through the EPA Significant New Alternatives Policy (SNAP) program.<sup>16</sup> There are also options for facilities to significantly reduce quantities of anhydrous ammonia by using a combination system with carbon dioxide or propylene glycol. These systems could greatly reduce the impact of a catastrophic ammonia release to surrounding communities.

<sup>16</sup> The EPA SNAP program is aimed at reducing ozone depleting chemicals such as chlorofluorocarbons. It also provides a resource for alternative refrigerants. A full list of available options is at [www.epa.gov/ozone/snap/](http://www.epa.gov/ozone/snap/).

### Generating Energy

Only one power plant in New Jersey still uses anhydrous ammonia to control nitrogen oxides (NOX) emissions to prevent another health hazard – smog. Five plants – PSEG’s Hudson and Mercer Fossil Plants, Cogen Technologies in Linden, and Carneys Point Generating and Logan Generating Company in South Jersey – use highly concentrated aqueous ammonia to control NOX emissions. All five facilities report zero offsite population as being in danger. These facilities could go a step further and produce aqueous ammonia on-site from urea, a practice that would completely remove the danger of a toxic gas release.<sup>17</sup>

#### **CHRISTIE ADMINISTRATION MUST STAFF DEP REVIEWS OF FACILITY REPORTS**

Understaffing at DEP is a serious problem. Many reports submitted to DEP by facilities regulated under the NJ *Toxic Catastrophe Prevention Act* have not even been reviewed for compliance. Some reports had been received almost two years ago.

WEC also found that many companies did not provide a specific economic, environmental, public health and safety, technological or legal justification for not adopting safer options, as required by the rule, or simply stated that no alternative was chosen, without further explanation. Reports that had been fully reviewed by DEP staff and were found to be in compliance did not address these issues.

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<sup>17</sup>Center for American Progress, “Chemical Security 101,” November 2008.

## CASE STUDY: TOXIC TRAIN DERAILMENT RISKS THE LIVES OF THOUSANDS

On November 30, 2012, nearly 700 residents were evacuated and at least 100 were sickened when more than 23,000 pounds of highly toxic, cancer-causing vinyl chloride (VC) spread through the working class and low-income town of Paulsboro, Gloucester County, after a train derailment caused a bridge to collapse into Mantua Creek. Four rail cars of VC and one car of ethanol derailed after the bridge failed to close properly. Conrail, a private company that owns the bridge and railroad tracks, ignored a failure signal before allowing the train to cross.

Reports show a failure of effective emergency response. First responders were not told of the hazards of vinyl chloride, and not provided with personal protective equipment (PPE).<sup>18</sup> For responders who requested PPE, available respirators were limited in quantity and air monitors inoperable. Schools were closed and children were sent home, some walking through a fog of VC; residents were given confusing orders about evacuation and when and how to shelter in place; and disarray among agencies caused inexcusable delays. Nearly 75 residents went to the hospital with respiratory irritation on the day of the incident. The Centers for Disease Control and the NJ Department of Health sent investigators to conduct exposure surveys of residents and emergency responders. Studies of exposed manufacturing workers show that cancer from VC exposure can take decades to develop.

The National Transportation Safety Board, the independent federal agency responsible for investigating transportation accidents, reported that 23 trouble ticket work orders about this particular bridge had been written by Conrail in the past year, despite a major repair project in 2009. The latest failure report came after a train crossed the bridge the night before the incident.

**Paulsboro should have been prepared to deal with this disaster.** Trains carrying toxic chemicals cross through the town four to five times daily. The town is home to many chemical plants and the Paulsboro Refining Company, the only oil refinery in NJ that uses highly toxic, volatile hydrofluoric acid. Under the *Emergency Planning and Community Right to Know Act*, states are required to establish Local Emergency Planning Committees (LEPCs) to help prevent and respond to chemical incidents. Under state law, both Gloucester County *and* the town of Paulsboro should have effective LEPCs.

**However, the best way to protect industrial towns like Paulsboro from a catastrophic chemical disaster is through prevention.** The Association of American Railroads, of which Conrail owners Norfolk Southern Railway Company and CSX Transportation, Inc. are members, has said:

“We can no longer continue to risk the lives of millions of Americans by using, transporting and storing highly toxic chemicals when there are safer alternatives commercially available. It is time for the nation’s big chemical companies to stop making the dangerous chemicals that can be replaced by safer substitutes or new technologies currently in the marketplace.”<sup>19</sup>

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<sup>18</sup> “First Responders Sue in Paulsboro Train Derailment,” *Philadelphia Inquirer*, May 16, 2013.

[http://articles.philly.com/2013-05-16/news/39284282\\_1\\_paulsboro-derailment-conrail-vinyl-chloride](http://articles.philly.com/2013-05-16/news/39284282_1_paulsboro-derailment-conrail-vinyl-chloride)

<sup>19</sup> Association of American Railroads, “Homeland Security Committee Urged to Consider Safer Chemicals; Chemical companies should stop manufacturing extremely dangerous chemicals,” Press Release, February 27, 2008.



WEC has long advocated that chemical plants and oil refineries switch to feasible and safer chemicals and processes to protect facility and railway workers and nearby communities. If they adopted such measures, there would be far less need to move railcars of toxic chemicals.

## RECOMMENDATIONS: STEPS TO SAFER NEW JERSEY JOBS AND COMMUNITIES

Under the administrations of Governors Kean, Codey, and Corzine, New Jersey adopted landmark public policies that successfully prompted industries using extraordinarily hazardous substances to become safer and more secure. However, serious policy and resource gaps remain to ensure worker and community protection from a potential chemical catastrophic toxic disaster.

An effective approach to ensure chemical safety and security must address every aspect of a toxic disaster, from prevention to response.

Governor Christie should direct DEP to change its rules<sup>20</sup> to:

**1. Prevent facility management from declaring their IST reviews as secret.** More than half of the facilities covered by TCPA have done this. It is unacceptable that facilities such as Kuehne Chemical in South Kearny can legally declare secret their IST reviews without public accountability. Moreover, the facilities that have actually adopted safer chemicals and processes – and thus pose less of a risk – should receive public credit for their positive steps. Additionally, DEP should place all IST reviews online. Communities and workers have a right to know whether management has made feasible efforts to make facilities safer and more secure.

**2. Require facility management to better document their claims that adopting safer chemicals and technologies is not feasible.** All but four facilities whose reports were publicly available and reviewed by WEC claimed that making such changes is not feasible. When claiming infeasibility for economic reasons, management should be required to quantify specific economic *benefits* of adopting safer options, such as reduced liability and insurance costs and public benefits such as savings to municipalities for reduced emergency response expenses and savings to potentially affected residents.

**3. More clearly define “inherently” safer options and prioritize IST principles.** Facilities are sometimes claiming that they have adopted IST when in fact they have not. Chemical substitution and process changes are the most effective methods to protect workers and the public from incidents. “Inherently” safer options should be distinguished from less effective control and management methods such as safer extremely hazardous substance (EHS) risk location, protection of storage vessels from weather conditions, changes in truck traffic patterns, addition of EHS leak detectors, use of closed circuit television systems, labeling of valves and equipment, revising procedures, installing a simulation training station, and adding light towers for EHS leak alarms.<sup>21</sup> While these can be good safety practices and may fulfill requirements under other laws, they should not be considered methods to achieve inherent safety because there is still the risk of toxic exposure.

**4. Provide opportunity for meaningful community involvement.** Currently, there are inadequate mechanisms for community involvement, including poorly functioning Local Emergency Planning Committees (LEPCs), which are mandated to help prevent and respond to chemical dangers in all 586 New Jersey counties and municipalities. DEP, with the State Police’s

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<sup>20</sup> DEP’s *Toxic Catastrophe Prevention Act* rules expire and must be readopted in 2016. However, the DEP does not need to wait to propose stronger policies and rules.

<sup>21</sup> Examples taken from DEP’s 2010 IST Implementation Summary.  
[www.nj.gov/dep/rpp/brp/tcpa/downloads/IST\\_SUMWEB.pdf](http://www.nj.gov/dep/rpp/brp/tcpa/downloads/IST_SUMWEB.pdf)

Office of Emergency Management, should require facility management, upon request by DEP, a Local Emergency Planning Committee, or 25 or more residents and/or employees, to convene a community meeting to address health, safety, environmental, emergency response, and sustainability concerns.

**5. Ensure that Local Emergency Plans truly inform neighbors.** Currently, facilities are required to develop emergency response plans to address toxic disasters and keep these plans on site. Although facilities frequently share these plans with emergency responders, plans are often not communicated effectively to local residents.<sup>22</sup> Therefore, neighbors do not know what specific steps to take in the event of a toxic or flammable release. Low income and people of color communities, where these facilities are often located, may face language and transportation barriers. Effective plans must address these factors. Emergency plans and instructions for what individuals should do to protect themselves should also be placed on the web.

**6. Require minimum facility staffing levels necessary for effective preventive maintenance and emergency shutdowns and response.** While chemical industry capital investment is increasing in China, India, and elsewhere, New Jersey chemical workers routinely comment on the lack of investment and preventive maintenance in their own plants. DEP should consider issuing rules requiring minimum facility staffing levels to protect public safety and health. To start, the state should conduct a study examining the health and safety impact of disinvestment and downsizing by New Jersey's chemical and oil industries.

**7. Produce an annual report drawing public attention to safer chemicals and processes identified and adopted by facilities, as well as many facilities' failure to do so.** The report would serve as a useful tool for industry, labor unions, local emergency responders, community and environmental organizations, and health, safety, and environmental professionals to share challenges and lessons learned to promote the use of safer chemicals and processes in New Jersey and nationwide.

Governor Christie should also:

**8. Provide sufficient staff and resources for DEP's Toxic Catastrophe Prevention Program to ensure** effective enforcement of the law's requirements and implementation of the measures proposed in this report. Currently, the TCPA Program has a total of ten staff. As noted earlier, the Program does not have enough staff to fully review IST reports. WEC estimates that a minimum of five additional staff are needed.

**9. Conduct a comprehensive review of county emergency response plans and a capacity assessment for each county.** Hazardous material response teams in New Jersey are organized at the county government level. The Governor should require through an Executive Order that all 21 county offices of emergency management evaluate emergency response plans for municipalities that fall within danger zones identified by facilities. A sample checklist is provided in Appendix C.

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<sup>22</sup> Such Emergency Response Plans are accessible to the public under the Emergency Planning and Community Right to Know Act of 1986.

**10. Direct DEP to withdraw its “waiver rule” that allows the agency not to enforce upon request from affected facilities certain parts of the Toxic Catastrophe Prevention Act.** In spring 2013, DEP implemented a new regulation to allow it to waive many of the rules it is charged with enforcing, including those particular regulations issued under TCPA that are not mandated by the federal Clean Air Act, Section 11r. The waiver rule can potentially endanger workers and the public. DEP should commence rulemaking to repeal it.

The US Environmental Protection Agency should:

**11. Issue new rules and guidance, authorized under section 112r of the Clean Air Act, that require high hazard facilities to prevent catastrophic consequences to workers and communities in the event of an accident, natural disaster or terrorist attack by adopting feasible safer chemical processes or other inherently safer technologies.** This would fulfill President Obama's August 1, 2013 executive order, "Improving Chemical Facility Safety and Security."

Despite positive steps by New Jersey to ensure chemical safety and security over the last decade, further action is urgently needed to address community and worker vulnerability to a toxic catastrophe. Many facilities have a clear track record of failing to adopt safer substances and processes as well as failing to keep potentially affected communities informed.

**New Jersey residents cannot afford another five years of a failure to act. It is time for the policies of Governor Christie to put worker and community health and safety first.**

## METHODOLOGY

Report findings are based on analysis of state and federal Risk Management Plans (RMPs) examined at government reading rooms. WEC analyzed RMPs filed under two different laws:

1. NJ DEP's list of facilities regulated *only* by the NJ *Toxic Catastrophe Prevention Act* (TCPA), and NOT by federal EPA. TCPA requires regulated facilities to develop and submit for public disclosure such RMPs. For a list of chemicals regulated by the NJ TCPA see *Toxic Catastrophe Prevention Act, Section 7:31-6.3, Table 1A*.

Among other elements, RMPs are required to include:

- ☞ an "offsite consequence analysis," which estimates the community impact of "worst-case scenario" and "alternative scenario" (more likely) chemical releases;
- ☞ a five-year history of accidental chemical releases;
- ☞ a prevention program; and
- ☞ an emergency response program.

WEC analyzed 42 "inherently safer technology" reports submitted by companies to the DEP under the NJ *Toxic Catastrophe Prevention Act*. All files were obtained through a request under the NJ *Open Public Records Act*.

2. US EPA's list of facilities regulated by the *Clean Air Act* Section 112 (r), which covers a similar universe of facilities as TCPA, though slightly different. CAA 112 (r) also requires regulated facilities to develop and submit for public disclosure RMPs. For a list of substances regulated by CAA 112 (r), see EPA, Office of Solid Waste and Emergency Response, *List of Lists: Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-To-Know Act (EPCRA)* and Section 112(r) of the Clean Air Act: *CEPCRA Section 302 Extremely Hazardous Substances*.  
[http://www.epa.gov/osweroe1/docs/chem/list\\_of\\_lists\\_revised\\_7\\_26\\_2011.pdf](http://www.epa.gov/osweroe1/docs/chem/list_of_lists_revised_7_26_2011.pdf).

## APPENDIX A: DANGERS OF SELECTED EXTRAORDINARILY HAZARDOUS SUBSTANCES USED IN NEW JERSEY<sup>23</sup>

### ACRYLONITRILE

Acrylonitrile is a flammable and reactive liquid, clear or slightly yellowish in color, with a faint odor. It is used to make synthetic fibers and polymers. Acute exposure irritates the eyes, nose, throat and lungs. High exposure levels can cause weakness, headache, confusion, nausea, vomiting, and collapse. At the highest exposure levels fluid build-up in the lungs (pulmonary edema) may lead to death. Chronic exposure may interfere with the thyroid gland. Acrylonitrile is a probable human carcinogen.

### AMMONIA (ANHYDROUS)

Anhydrous ammonia is a corrosive colorless gas with a strong odor. It is used in refrigeration and in making fertilizer, plastics, dyes, textiles, detergents, and pesticides. Acute ammonia gas exposure can irritate the skin; burn the eyes, causing temporary or permanent blindness; and cause headaches, nausea, and vomiting. High levels can cause fluid in the respiratory system (pulmonary or laryngeal edema), which may lead to death. Chronic exposure damages the lungs; repeated exposure can lead to bronchitis with coughing or shortness of breath.

### CHLORINE

Chlorine is a greenish-yellow gas with a strong, irritating odor. It is used in making other chemicals, as a disinfectant, in bleaching, and for purifying water and sewage. Acute exposure can severely burn the eyes and skin, causing permanent damage, and may cause throat irritation, tearing, coughing, nose bleeds, chest pain, fluid build-up in the lungs (pulmonary edema), and death. Chronic exposure can damage the teeth, and irritate the lungs, causing bronchitis, coughing, and shortness of breath. A single high exposure can permanently damage the lungs.

### CHLOROFORM

Chloroform is a colorless liquid used in making dyes, drugs, and pesticides. Acute exposure to chloroform can irritate and burn the skin, eyes, nose, and throat, and cause dizziness, lightheadedness, headache, confusion, and irregular heartbeat which may lead to death. Chloroform probably causes cancer and may cause birth defects. Chronic chloroform exposure can damage the skin, liver, kidneys, and nervous system.

### EPICHLOROHYDRIN

Epichlorohydrin is a reactive colorless liquid with a slightly irritating, chloroform-like odor. It is used to make plastics, resins, and glycerin. Acute exposure to epichlorohydrin vapor irritates the eyes, nose, bronchial tubes, and lungs. High levels can chemically burn the lungs or cause dangerous fluid build-up, which may lead to death. Eye contact may cause permanent damage, and skin contact can cause painful blistering which may be delayed in onset for minutes or

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<sup>23</sup> Health hazard information sources include:

- New Jersey *Hazardous Substance Fact Sheets* (<http://web.doh.state.nj.us/rtkhsfs/indexfs.aspx>)
- National Library of Medicine Hazardous Substance Data Bank (<http://toxnet.nlm.nih.gov>)
- Environmental Protection Agency *Hazardous Substance Fact Sheets* ([www.epa.gov/enviro/html/emci/chemref/index.html](http://www.epa.gov/enviro/html/emci/chemref/index.html))



hours. Chronic exposure can damage the kidneys, liver, and lungs. Epichlorohydrin is a probable human carcinogen and may decrease fertility in males.

#### ETHYLENE OXIDE

Ethylene oxide is a colorless gas that is highly flammable, reactive, and explosive. It is used to make antifreeze, polyesters, and detergents, and is used for industrial sterilization. Acute exposure can irritate the eyes, skin, nose, throat, and lungs, and may cause shortness of breath, headache, nausea, vomiting, diarrhea, drowsiness, weakness, and loss of muscle control. Higher exposure levels may cause loss of consciousness, fluid in the lungs (pulmonary edema), and death. Chronic exposure to ethylene oxide may cause cancer and birth defects, as well as damage to the liver, kidneys, and nervous system.

#### HYDROGEN CHLORIDE (HYDROCHLORIC ACID)

Hydrogen chloride is a corrosive, colorless to slightly yellow gas with a strong odor. It is used in metal processing, analytical chemistry, and in making other chemicals. Acute exposure to hydrogen chloride can cause severe burns of the skin and eyes, leading to permanent damage and blindness. Breathing hydrogen chloride vapor irritates the mouth, nose, throat, and lungs, causing coughing, shortness of breath, fluid build-up in the lungs (pulmonary edema), and possibly death. Chronic exposure damages the lungs and may erode the teeth.

#### HYDROGEN FLUORIDE (HYDROFLUORIC ACID)

Hydrogen fluoride is a corrosive colorless fuming liquid or gas with a strong irritating odor. It is used in etching glass and in making other chemicals, including gasoline. Breathing the vapor causes extreme respiratory irritation (with cough, fever, chills, and tightness) that may be fatal. Contact can severely burn the skin and eyes, resulting in permanent eye damage or blindness. Long-term exposure may damage the liver and kidneys, and causes fluorosis, with symptoms of weight loss, malaise, anemia, and osteosclerosis.

#### SULFUR TRIOXIDE

Sulfur trioxide is a corrosive colorless liquid that fumes in the air forming sulfuric acid vapor or mist. Its health effects in the air are essentially those of sulfuric acid (and are similar to sulfur dioxide and to oleum). Sulfur trioxide vapor can severely irritate and burn the skin, eyes, throat, and lungs. Eye damage can include blindness. Breathing the vapor can lead to choking, spasm, and pulmonary edema. Exposure can cause bronchitis, emphysema, and permanent lung damage.

#### SULFURIC ACID

Sulfuric acid is an oily liquid that is highly corrosive. It is used in fertilizers, chemicals, dyes, petroleum refining, etching and analytical chemistry, and in making iron, steel, and industrial explosives. Breathing sulfuric acid mist can irritate the lungs; high levels can cause death through a dangerous build-up of fluid in the lungs (pulmonary edema). Contact can severely burn the skin and eyes. Repeat exposure can cause erosion and pitting of the teeth, stomach upset, nose bleeds, tearing of the eyes, emphysema, and bronchitis.

#### THIONYL CHLORIDE

Thionyl chloride is a colorless or pale yellow to red liquid with a pungent odor. It is used in manufacturing organic chemicals, as a solvent in lithium batteries, and in making pesticides. Thionyl chloride may react or explode upon contact with other substances. It is a corrosive

chemical that can severely irritate or burn the skin and eyes. Breathing thionyl chloride vapors can irritate the nose, throat, and lungs, and at higher levels can cause fluid to build up in the lungs (pulmonary edema), with severe shortness of breath and potentially death.

#### TITANIUM TETRACHLORIDE

Titanium tetrachloride is a colorless to light yellow liquid that has a penetrating acid odor. It is used to make titanium pigments, iridescent glass, artificial pearls, and as a catalyst in polymerization. Titanium tetrachloride is highly irritating to the skin, eyes, and mucous membranes. Acute exposure can burn the skin, eyes, throat, and lungs. Chronic exposure can lead to chronic bronchitis, wheezing, and build-up of fluid in the lungs.

#### TOLUENE-2,4-DIISOCYANATE

Toluene-2,4-diisocyanate is a colorless to pale yellow liquid with a strong fruity odor. It is used to make polyurethane foams, elastomers, and coatings. Contact can irritate and burn the eyes and skin, and breathing vapor can irritate the nose, throat, and lungs, leading to coughing, chest tightness, and shortness of breath. High levels can lead to fluid in the lungs (pulmonary edema). Chronic exposure may cause concentration and memory problems. Toluene-2,4-diisocyanate is a probable carcinogen.

#### VINYL ACETATE

Vinyl acetate is a flammable and reactive colorless liquid with a sharp sweet odor. It is used in making polyvinyl resins. Acute exposure to vinyl acetate can irritate the eyes, nose, throat, and skin, and cause shortness of breath. High levels can cause fatigue, irritability and dizziness. Prolonged contact can blister and burn the skin.

#### VINYL CHLORIDE

Vinyl Chloride is a colorless gas, with a sweet odor. It is used to make polyvinyl chloride (PVC). Acute exposure to vinyl chloride can cause headache, nausea, vomiting, dizziness, fatigue, weakness and confusion. In extreme exposures, vinyl chloride can cause frostbite. Chronic exposures can cause damage to the liver, lungs, and a rare form of liver cancer. It may cause reproductive damage.

## APPENDIX B: BACKGROUND ON CHEMICAL SECURITY POLICIES IN NEW JERSEY

Ninety industrial facilities in our state can pose catastrophic safety and health risks to workers and the public in the event of a release of an *extraordinarily hazardous substance*. Overall, there are approximately 309 plants, including petroleum and chemical storage and transfer facilities that are covered by either New Jersey's Toxic Catastrophe Prevention Program or Spill Act based on their use of *hazardous substances*.<sup>24</sup>

In 2011, there were 3,005 facilities in New Jersey that use or store 10,000 or more pounds of hazardous substances capable of harming worker health and safety and having damaging impacts on surrounding communities or the environment.<sup>25</sup>

Moreover, in 2011, more than 16 billion pounds of hazardous substances were brought on site or manufactured at our state's industrial facilities.<sup>26</sup> These substances include extraordinarily hazardous substances like chlorine, hydrofluoric acid, hydrogen chloride, phosgene, and ammonia<sup>27</sup> – each of which can form a dangerous airborne toxic plume in certain circumstances.

Movement of hazardous substances by ships, trucks, and rail cars also remains a significant vulnerability in New Jersey, which is a major transportation corridor. In November 2012, thousands of residents in Paulsboro, Gloucester County, were exposed to toxic vinyl chloride after five train cars were derailed when crossing a bridge. One of the train cars spilled 23,000 pounds of vinyl chloride, which is known to cause respiratory problems and a form of liver cancer.<sup>28</sup> According to the National Transportation Safety Board, Conrail had filed 23 trouble tickets about the bridge, the most recent one less than 24 hours prior to the incident.<sup>29</sup>

### THE CHANGING THREAT

In New Jersey and throughout the industrialized world, chemical incidents are almost always unintentional. However, the terrorist attacks of September 11, 2001, demonstrated that like airplanes, chemical facilities can be “weaponized” by those intending to harm our citizens and our economy. In a 2006 address to the American Chemistry Council, Department of Homeland Security Secretary Michael Chertoff said, “...Obviously, one of the areas we have to be concerned about are parts of our infrastructure which house chemicals which could...create a huge amount of havoc in a populated area – whether it be because of a large explosion or whether it's because of toxic inhalation.”<sup>30</sup> As recently as May 2013, Homeland Security officials

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<sup>24</sup> Information provided by NJDEP on July 9, 2013, in response to a WEC request.

<sup>25</sup> Information provided by NJDEP. This figure excludes gas stations.

<sup>26</sup> Ibid. Since publication of WEC's 2008 Report, “Still at Risk,” NJDEP discontinued tracking of hazardous substance categories, such as “extraordinarily hazardous substances” and “cancer-causing hazardous substances,” due to a lack of staffing and resources. As a result, WEC reports the figure for all hazardous substances. In 2008, WEC reported 1.5 billion pounds of EHSs alone were brought on site or manufactured at our state's facilities.

<sup>27</sup> Information provided by NJDEP on June 11, 2013, in response to a WEC request.

<sup>28</sup> “La. Evacuees Return Home after Acid Spill Cleared,” reported by the *Associated Press*, May 19, 2008.

<sup>29</sup> Walt Bogdanich and Christopher Drew, “Deadly Leak Underscores Concerns about Rail Safety,” *New York Times*, January 9, 2005.

<sup>30</sup> Remarks by Homeland Security Secretary Michael Chertoff at the National Chemical Security Forum, March 21, 2006.

warned of a heightened cybersecurity risk within US infrastructure systems, including at chemical, water, and electric plants.<sup>31</sup>

But, even with the heightened concern over terrorism, there have not been successful attacks on these facilities. The US chemical industry has seen far more accidents than attacks. According to a report by the US Inspector General in March 2013, 323 facilities reported 460 serious/major accidents in the four-year period from October 2008 to March 2012. These accidents resulted in 14 worker fatalities, 330 injuries on and off-site, 64,000 people required to shelter in place, and \$264 million in damages to plants and neighboring structures.<sup>32</sup>

Although evidence points clearly to chemical site vulnerability nationwide, the one federal law addressing this issue enacted since September 11, 2001 is woefully inadequate. In 2007, six years after 9/11, Congress approved rules for the Chemical Facilities Anti-Terrorism Standards to regulate high hazard facilities that could be targeted by terrorists. Of the over 3,500 facilities identified as “high-risk” by the US Department of Homeland Security (DHS), the Government Accountability Office estimates it will take another seven to nine years for DHS to review and approve site security plans.<sup>33</sup>

## NEW JERSEY’S RESPONSE

New Jersey has undertaken efforts to address the risks of terrorism and protect “critical infrastructure.”<sup>34</sup> The *Domestic Security Preparedness Act of 2001* established joint anti-terrorism efforts between government and industry.<sup>35</sup> The Act created an Infrastructure Advisory Committee (IAC) and 20 sector advisory groups to work with different state agencies. Among these advisory groups are those for the chemical and petroleum industries, wastewater and water treatment facilities, hospitals, and schools.

During the McGreevey Administration, the Task Force and IAC advisory groups produced separate “best practices” for security in the chemical and oil industries. These best practices are supposedly baseline plans that can apply across an entire sector and focus on prevention, preparation, response, and recovery. For the chemical industry, these guidelines were developed with seven chemical company representatives and state and national trade organizations.<sup>36</sup> The chemical industry best practice guidelines are inadequate in scope, poorly written and edited, and extremely confusing.<sup>37</sup> Moreover, there was no input from front line workers, who, by virtue of their knowledge and experience, should have been involved in developing this document. This approach to chemical security emphasized more gates, guards, and “hardening” of plant perimeters. While such measures can be appropriate, they are insufficient.

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<sup>31</sup> “U.S. Warns of Increased Risk of Cyberattack,” *Washington Post*, May 9, 2013.

<sup>32</sup> Office of Inspector General, US Environmental Protection Agency, “Improvements Needed in EPA Training and Oversight in Risk Management Program Inspections,” March 21, 2013.

<sup>33</sup> Government Accountability Office Report, *Critical Infrastructure Protection: DHS Efforts to Assess Chemical Security Risk and Gather Feedback on Facility Outreach Can Be Strengthened*, April 2013.

<sup>34</sup> Past efforts are documented in the Annual Reports by the New Jersey Domestic Security Preparedness Task Force.

<sup>35</sup> *Ibid.*

<sup>36</sup> Personal communication from former Assistant Attorney General Larry O’Reilly.

<sup>37</sup> See Current NJ Policies for Chemical Safety and Security, WEC, December 2, 2005.

Overall, until August 2005, the state's approach to chemical security under Democratic Governors McGreevey and Codey did not vary much from that of the Bush Administration, which relied largely on voluntary industry self-regulation. In fact, chemical industry trade associations almost led former DEP Commissioner Bradley Campbell to adopt their own industry's *Responsible Care Security Code of Management Practices* as the centerpiece of our state's policy to address terror risks. A resulting "Memorandum of Agreement (MOA)" would have put a state seal of approval on corporate self-regulation.<sup>38</sup> WEC – along with allied labor, community, and environmental organizations – contended that this approach was the wrong way to protect us from terrorism or from the routine fires, explosions, spills, and releases caused by these industries and defeated this scheme.

## NEW JERSEY LEADS THE WAY FOR FEDERAL ACTION

As a US Senator, former Governor Jon Corzine, an advocate for chemical security, focused policy on ensuring "inherent," or built-in, safety and security, such as substituting safer chemicals, reducing unnecessarily large inventories of hazardous substances, lowering operating pressures and temperatures, and using better backup shutdown procedures in the event of an emergency. Only these built-in solutions can ensure that a facility will not be able to release a toxic gas cloud into downwind communities.

As Governor, he took important steps forward to adopt the strongest chemical security policies in the country. The NJ Department of Environmental Protection, under the Corzine Administration and led by Commissioner Lisa Jackson, has:

- Required facilities covered by the state Toxic Catastrophe Prevention Act (TCPA) to evaluate options for inherently safer technologies (IST). This was an expansion of a requirement for *chemical* sector facilities regulated under TCPA and ordered by the Domestic Security Preparedness Taskforce in 2005. IST includes substitution of safer chemicals or changing to safer processes. *These policies were the first in the nation to require facilities to make such precautionary evaluations.*
- Expanded the rights of workers to accompany DEP staff on inspections at 279 facilities that use hazardous substances but are not covered by TCPA. The policy was created through an administrative order and is similar to one issued in 2005 for workers at TCPA facilities. *These policies are the nation's first to involve workers and their unions in such community protection efforts and were precedents for implementation of new national EPA policy.*<sup>39</sup>

During President Obama's election campaign in 2008, he committed to securing our chemical plants by establishing a clear set of federal regulations that all plants must follow, including using safer technology, such as less toxic chemicals, where possible. He prefaced his remarks with this statement:

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<sup>38</sup> *Memorandum of Agreement Concerning Domestic Security Preparedness*, draft dated September 2003, NJ Department of Environmental Protection and industry trade associations.

<sup>39</sup> A fact sheet on the DEP Administrative Order to establish this right can be found at: <http://www.nj.gov/dep/rpp/brp/tcpa/tcpadown.htm>.

“The first responsibility of any President is to protect the American people. Yet, seven years after the 9/11 attacks, our country is still unprepared to prevent and respond to a major terrorist attack or catastrophe. We deserve better.”<sup>40</sup>

Due to the efforts of labor, community, and environmental groups, led by the Coalition to Prevent Chemical Disasters, the US EPA is considering using its authority under the Clean Air Act’s “general duty clause” to require all high hazard facilities to evaluate options for safer chemicals and processes.

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<sup>40</sup> *Change We Can Believe In: Barack Obama’s Plan to Renew America’s Promise*, Crown Publishing, September 9, 2008.



## APPENDIX C: LOCAL EMERGENCY PLANNING COMMITTEES

Governor Christie should direct his Office of Emergency Management to conduct a comprehensive review of county emergency response plans and a capacity assessment for each county. The following excerpted language, proposed by former Senator Frank Lautenberg in the 2011 *Secure Chemical Facilities Act* (S.709), would serve as a useful framework for this review:

### **SEC. 2119. EMERGENCY RESPONSE CAPACITY STUDY.**

#### **(a) ASSESSMENT AND REPORT. —**

(1) **IN GENERAL.** — The Secretary shall assess and submit a report to Congress on the emergency response resources that would be required in order to feasibly respond to a worst-case chemical facility terrorist incident, including worst-case release of a substance of concern.

(2) **CONTENTS.** — The report required under paragraph (1) shall describe—

- (A) the availability of fire, police, medical, and other response personnel;
- (B) the sufficiency of emergency response facilities, equipment, and supplies;
- (C) the logistical feasibility of evacuation;
- (D) the carrying capacity of impeded and unimpeded evacuation routes;
- (E) the protective capacity of structures;
- (F) the availability of health and environmental hazard detection, identification, monitoring, cleanup, and decontamination;
- (G) the surge capacities of hospitals and other health care facilities;
- (H) the feasibility of warning persons within vulnerable areas prior to impact and the capacity of community notification and warning systems;
- (I) the protection of vulnerable populations and immobilized populations (including in schools, day care centers, nursing homes, hospitals, sports arenas, shopping malls, homes, and businesses);
- (J) any additional relevant planning provisions identified in section 303(c) of the Emergency Planning and Community Right to Know Act (42 U.S.C. 11003(c));
- (K) the necessary funding, organization (including interagency coordination), personnel, training, equipment, exercises, transportation, community notification, medical, infrastructure, and other elements to appropriately address any deficiencies in response capacities; and
- (L) any additional factors affecting the feasibility of appropriately responding to a worst-case chemical facility terrorist incident, including worst-case release of a substance of concern.

(3) **PUBLIC AVAILABILITY.**—The report required under this section shall be made publicly available.

The following “Report Card” was based on a version written by Paul Orum, Working Group on Community Right-to-Know, 1983.

## **“Report Card” for Your Local Emergency Planning Committee**

In 1986, Congress passed the Emergency Planning and Community Right-to-Know Act (EPCRA), which established several thousand Local Emergency Planning Committees (LEPC) across the United States. These LEPCs were intended to identify chemical hazards, plan for emergencies, convey public information, and include all citizens. But are the LEPCs working? Many community activists believe that the mostly-volunteer LEPCs are not able to fulfill the vision of EPCRA, particularly for community involvement, hazard communication, and hazard reduction. Below are some criteria for evaluating your LEPC. (To locate your LEPC, see [www.epa.gov/osweroe1/content/rmp/readingroom.htm](http://www.epa.gov/osweroe1/content/rmp/readingroom.htm))

[/ ] Check each item completed by your LEPC.

### **Items completed:**

51 to 60 - Outstanding  
41 to 50 - Very Good  
31 to 40 - Good  
21 to 30 - Progressing  
11 to 20 - Mediocre  
0 to 10 - Non-functional

### **Has your LEPC...**

#### **[1] Goals**

Established measurable outcome goals for –

- [ ] reducing accidents?
- [ ] reducing vulnerability zones and accident potentials?
- [ ] improving emergency response and mitigation?
- [ ] established goals for public access to chemical hazards information?
- [ ] set process objectives (for funding, participation, communication, putting inherent safety before response, etc.) and annually evaluated progress toward achieving goals?

#### **[2] Structure and Process**

- [ ] achieved genuinely broad-based and balanced membership?
- [ ] secured adequate funding sources and professional staffing (through legislation, agency budgets, donations, etc.)?
- [ ] adopted a mission statement and by-laws?
- [ ] held regular, well-attended meetings (at least quarterly)?
- [ ] held formal meetings (advance agenda, written minutes)?
- [ ] organized active subcommittees and established clear member roles?
- [ ] maintained policy independence from the host agency?
- [ ] produced an annual report (covering trends in accidents, hazards, enforcement, drills, site-specific risk reduction, etc.)?
- [ ] utilized external resources such as other LEPCs and government agencies (e.g., to obtain training materials)?

#### **[3] Community Hazards Analysis**

(for facilities with extremely hazardous substances, EHS):

- [ ] developed easily understood community maps showing EHS facilities, vulnerability zones, and transportation routes?
- [ ] obtained needed EHS facility data through questionnaires, site visits, and document requests (using EPCRA 303(d)(3) authority)?
- [ ] obtained worst-case and lesser release scenarios prepared under EPA’s Risk Management Planning regulations?
- [ ] obtained EHS facility process hazard analyses prepared under OSHA’s Process Safety Management regulations?
- [ ] asked transportation carriers to identify standard routes, storage areas, average amounts, and vulnerability zones?
- [ ] identified critical facilities, vulnerable environments, and potentially exposed populations (e.g., schools, nursing homes, residential areas, workers on-site)?
- [ ] reviewed hazard analyses with EHS facility managers and worker representatives (including shelter-in-place and evacuation needs)?
- [ ] established computerized hazards analysis capabilities?
- [ ] prioritized hazards (e.g., by vulnerability zone)?
- [ ] independently reviewed or tested site security measures?

#### **[4] Emergency Response Planning**

- [ ] submitted a site-specific emergency plan to the State Emergency Response Commission?

- ☐ exercised the emergency plan and corrected identified weaknesses?
- ☐ ensured coordination between EHS facilities and fire departments, as well as other emergency response organizations (police, hospitals, etc.)?
- ☐ sponsored training for fire, medical, police, hazmat, and other response personnel?
- ☐ ensured that hazard analyses are incorporated into fire department pre-plans?
- ☐ established alert and warning systems (and coordinated systems among facilities)?
- ☐ established means to determine the severity of a release, and the area and population likely to be affected?
- ☐ planned shelters and evacuation routes?
- ☐ designated community and facility emergency response coordinators?
- ☐ maintained a current inventory of emergency response resources (equipment, facilities, and expertise)?
- ☐ provided public education on protective actions (evacuation and shelter-in-place)?
- ☐ evaluated the protective capacity of shelter-in-place structures?
- ☐ acknowledged the limits of emergency response capabilities for protecting people, property, and the environment?

#### **[5] Accident Prevention**

- ☐ promoted inherently safer technologies (involving safer chemicals, lower pressures or temperatures, less storage, fewer shipments, etc.)?
- ☐ promoted “add-on” safety controls (e.g., secondary containment, automatic shutoffs, process alarms, etc.)?
- ☐ promoted site security improvements (e.g., guards, fences, cyber barriers, independent audits, etc.)?
- ☐ asked facilities to present progress reports on chemical hazard reduction projects?
- ☐ provided the community hazard analysis to planning commissions, zoning boards, public works departments, citizen advisory councils, and other local entities?
- ☐ acquainted facilities with hazard reduction resources (e.g., financing, expertise)?
- ☐ convened seminars for facility personnel, union health and safety committees, etc.?
- ☐ analyzed spills and response, and publicized lessons learned and best practices?
- ☐ given public recognition for hazard reduction achievements (e.g., annual awards)?

#### **[6] Community Right-to-Know**

- ☐ publicized availability of right-to-know information?
- ☐ computerized data for ease of access and analysis?
- ☐ established a convenient information request process?
- ☐ provided Tier II chemical storage information as required?
- ☐ communicated Risk Management Plan information to the public?
- ☐ worked with the news media to publicize hazard maps and safer alternatives?
- ☐ publicized the federal reading rooms?
- ☐ publicized options for reducing vulnerability zones through safer technologies?
- ☐ ensured that meetings are accessible and well publicized (time, place, agenda)?
- ☐ worked with concerned communities at specific sites (e.g., through good neighbor agreements)?

#### **[7] Enforcement**

- ☐ publicized reporting requirements to covered facilities and transportation carriers?
- ☐ provided compliance assistance to facilities and carriers?
- ☐ uncovered and prosecuted non-reporting firms?
- ☐ pursued beneficial expenditures in settling citizen suits against non-reporting firms?

## **APPENDIX D: GUIDANCE FOR TOXIC CATASTROPHE PREVENTION ACT (TCPA) INHERENTLY SAFER TECHNOLOGY (IST) REVIEWS**

This document and other resources can be found online at:

<http://www.nj.gov/dep/rpp/brp/tcpa/tcpadown.htm>

## Opinion: Will Chris Christie Act to Prevent a Toxic Disaster?

The Star Ledger of Newark  
Sunday, October 13, 2013

**By John Pajak**

"It can't happen here." That's what most of us think when we hear about toxic chemical disasters. It's a comforting thought — except that if you live in New Jersey, it unfortunately is just not true.

Take the people who live in Paulsboro. Last November, without warning, a cloud of highly toxic vinyl chloride filled the air for miles when a train transporting 23,000 pounds of it derailed.

Exposure to vinyl chloride can cause cancer and mutations in a person's DNA. Nearly 100 people went to the hospital with respiratory problems. At least 200 residents had to be evacuated from their homes. Schools were closed. Businesses were disrupted. And further health effects may not be felt for years.

In our state as a whole, there are 90 facilities that use large quantities of highly hazardous chemicals that could severely harm workers and surrounding communities.

A catastrophic toxic release, weather disaster or hostile attack at these facilities — located in 19 out of New Jersey's 21 counties — could jeopardize the lives, jobs, health and homes of millions of people. Under the right conditions, toxic chemicals used at these facilities can form a highly hazardous cloud that can drift downwind, enveloping neighborhoods, schools, hospitals, industrial facilities or other public areas.

Fortunately, safer substances or processes that would eliminate or reduce the risk are known and proven in most cases. Yet, executives have not adopted them, and Gov. Chris Christie has not enforced the law designed to prod them to do so.

Five years ago, the state Department of Environmental Protection under Gov. Jon Corzine adopted rules according to the state's Toxic Catastrophe Prevention Act that were designed to drastically reduce the risk of chemical disaster.

The DEP safeguards called on highly hazardous facilities to identify feasible alternatives for implementing “inherently safer technology” and provide a schedule for implementation. If a facility found that an alternative was not feasible, it had to explain why.

Yet, a new research report by the New Jersey Work Environment Council and 15 labor, firefighter and environmental organizations found that the Christie administration has turned a blind eye to facilities that are not switching to safer chemicals and processes. Of the dozen facilities that were listed five years ago as posing danger to the largest number of people, 10 still have not switched to protect workers and surrounding communities. They include Kuehne Chemical Co. in South Kearny, Equistar Chemicals in Edison, Hercules in Parlin, and Bayonne Plant Holding in Bayonne.

Christie has not provided DEP with enough staff to thoroughly review for compliance many of the update reports facilities are required to file.

WEC found about half of the facilities that submitted reports took advantage of a loophole in the regulations that allows management to block public disclosure of the safety information in the report.

Among the 42 reports that were publicly available, many failed to identify already proven alternatives for hazardous chemicals and processes. Of the nine facilities that claimed options were economically infeasible, seven failed to provide the required analysis to prove that. None of the reports accounted for economic benefits from preventing large-scale toxic exposures.

Recognizing that the governor has failed to protect public safety, WEC and other New Jersey groups also have joined with major national organizations to ask the Obama administration to use the Environmental Protection Agency’s authority under the Clean Air Act of 1990 to require high-hazard facilities to adopt cost-effective and feasible safer chemicals or processes.

Preventing toxic catastrophes by using proven technologies and safer chemicals will be far less costly than disastrous losses for millions of people.

Corporate executives know their responsibilities. Laws are already on the books. Now it’s time for the governor to stand up for the public interest.

*John Pajak is a refinery worker, vice president of Teamsters Local 877 and president of the New Jersey Work Environment Council, a coalition of 70 environmental, community and labor groups. The report, “Failure to Act,” is at [njwec.org](http://njwec.org).*

# Opinion: Toxic Brews at Chemical Plants Could Trigger Another Paulsboro-like Incident

The South Jersey Times  
Sunday, October 20, 2013

**By Natasha Lavard and Debra McFadden**

A highly toxic cloud of cancer-causing chemicals moves into neighborhoods where local residents live and work. People are sent to the hospital in droves. More have to evacuate their homes. Parents are told not to let their children out of the house to go to school. Businesses are shut down. It may sound like a bad Hollywood movie, but this worst-case scenario happened last November in Paulsboro, when a train carrying more than 12 tons of vinyl chloride derailed and spilled its hazardous load. The full impact of the exposure people suffered may not be known for years.

What we do know is that in the State of New Jersey, there are 90 facilities with large enough amounts of highly hazardous chemicals to cause similar — or worse — disasters to the one that occurred in Paulsboro. All it would take would be a major toxic release, superstorm or terrorist attack to put millions of people in danger in southern New Jersey and Pennsylvania.

Three facilities — Solvay Solexis in West Deptford, Dupont's Chambers Works in Deepwater and Paulsboro Refining in Greenwich Township — each have enough toxic materials, were a disaster to happen, to endanger at least 2 million people in this region. Other facilities with large amounts of hazardous materials include the Ferro Delaware River Plant in Logan, CVC Specialty Chemicals in Maple Shade, State Metal Industries in Camden and Bridor Inc. in Vineland.

Potential disasters can be prevented, however, by using safer substances or processes that have been proven to work. Unfortunately, corporate executives have been very slow to adopt these changes.

In a letter last April, former Gov. Christie Whitman wrote that action to require major users of highly hazardous chemicals to review the potential use of safer materials and processes is long overdue.

“Facilities with the largest quantities ... should assess their operations to identify safer cost-effective processes that will reduce or eliminate hazards in the event of a terrorist attack or accident,” stated Whitman, who also served as U.S. Environmental Protection Agency administrator under President George W. Bush.

The New Jersey Department of Environmental Protection under one of Whitman’s successors as governor, Jon Corzine, adopted rules designed to reduce the risk of a chemical catastrophe. These standards require facilities handling large amounts of hazardous chemicals to 1) identify feasible alternatives for adopting “inherently safer technology,” 2) commit to a schedule for implementation, and 3) provide a justification if claiming that a particular alternative is not feasible.

The rules were adopted five years ago. Unfortunately, current Gov. Chris Christie has chosen not to vigorously enforce them, according to a new study, **“Failure to Act,”** issued by the N.J. Work Environment Council (WEC) and 15 labor, firefighter and environmental organizations.

Facilities are required to file reports updating whether they are in compliance with the “inherently safer technology” protections for workers and the public. But Christie has not provided DEP with enough personnel to thoroughly review many of those reports. About half of the facilities applied a regulatory loophole that allows them to keep the public from reviewing the safety information in their reports, thereby defeating one of the main purposes of the reporting requirement.

Based on our analysis, many of the reports that were publicly available did not identify existing alternatives to hazardous chemicals and processes. Only two that claimed no alternatives were economically feasible provided the required data to try to justify that claim.

Given that Christie has prioritized corporate interests over public safety, WEC and other state and national organizations are calling on the EPA to require facilities with hazardous materials to switch to safer chemicals or processes, using authority provided by the Clean Air Act of 1990.

After major disasters, blue-ribbon commissions typically are appointed to study what went wrong and how immense human costs could have been avoided. In this case, the solutions have already been demonstrated. All that



is needed is for corporate executives to put public safety first — and for Gov. Christie to take strong action when they don't.

*Natasha Lavard is a member of the Paulsboro Action Committee. Debra McFadden is Assistant Director of the NJ Work Environment Council, a coalition of 70 environmental, community and labor groups. The report "Failure to Act" is at [www.njwec.org](http://www.njwec.org).*

**APPENDIX F: LIST OF FACILITIES REGULATED UNDER THE  
NEW JERSEY TOXIC CATASTROPHE PREVENTION ACT**

This list, provided by the NJ Department of Environmental Protection, is current as of September 3, 2013 and is in order by county.

A management contact person and their telephone number are included for each facility.

**State of New Jersey**  
**Department of Environmental Protection**  
**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

<b>Name :</b> FXI FOAMEX INNOVATIONS	<b>TCPA ID :</b> 5019	<b>EPA Facility ID :</b> 100000072208	<b>COMU :</b> 0212
<b>Mail Addr :</b> 1400 N PROVIDENCE ROAD, SUITE 2000	MEDIA, PA 19063-2076	<b>Cty :</b> BERGEN	
<b>Location :</b> 13 MANOR RD	EAST RUTHERFORD, NJ 07073	<b>Mun :</b> EAST RUTHERFORD BORO	
<b>RMP Contact :</b> ROBERT JAMES, REGIONAL EHS MANAGER	<b>Phone :</b> (201) 933-8540	<b>Status :</b> Registered	

<b>Name :</b> UNITED WATER NEW JERSEY	<b>TCPA ID :</b> 0106	<b>EPA Facility ID :</b> 100000108331	<b>COMU :</b> 0226
<b>Mail Addr :</b> 200 OLD HOOK RD	HARRINGTON PARK, NJ 07640-1799	<b>Cty :</b> BERGEN	
<b>Location :</b> 200 LAKE SHORE DR	HA WORTH, NJ 07641-1000	<b>Mun :</b> HA WORTH BORO	
<b>RMP Contact :</b> THOMAS NEILAN, DIRECTOR - OPERATIONS	<b>Phone :</b> (201) 767-9300	<b>Status :</b> Registered	

<b>Name :</b> CREST FOAM INDUSTRIES INC	<b>TCPA ID :</b> 5008	<b>EPA Facility ID :</b> 100000093178	<b>COMU :</b> 0237
<b>Mail Addr :</b> 100 CAROL PL	MOONACHIE, NJ 07074	<b>Cty :</b> BERGEN	
<b>Location :</b> 100 CAROL PL	MOONACHIE, NJ 07074	<b>Mun :</b> MOONACHIE BORO	
<b>RMP Contact :</b> VIREN CHAUHAN, QA MANAGER	<b>Phone :</b> (201) 881-1120	<b>Status :</b> Registered	

<b>Name :</b> FARMLAND DAIRIES LLC	<b>TCPA ID :</b> 5366	<b>EPA Facility ID :</b> 100000042615	<b>COMU :</b> 0265
<b>Mail Addr :</b> P O BOX 3340, 520 MAIN AVE	WALLINGTON, NJ 07057	<b>Cty :</b> BERGEN	
<b>Location :</b> 520 MAIN AVE	WALLINGTON, NJ 07057	<b>Mun :</b> WALLINGTON BORO	
<b>RMP Contact :</b> RON GAIDUSEK, GENERAL MANAGER	<b>Phone :</b> (973) 777-2500	<b>Status :</b> Registered	

<b>Name :</b> OCEAN SPRAY CRANBERRIES INC	<b>TCPA ID :</b> 5293	<b>EPA Facility ID :</b> 0	<b>COMU :</b> 0303
<b>Mail Addr :</b> 104 E PARK ST	BORDENTOWN, NJ 08505	<b>Cty :</b> BURLINGTON	
<b>Location :</b> 104 E PARK ST	BORDENTOWN CITY, NJ 08505	<b>Mun :</b> BORDENTOWN CITY	
<b>RMP Contact :</b> RHANDI WESTON, EHS MGR	<b>Phone :</b> (609) 298-0905	<b>Status :</b> Registered	
	Ext. 484		

<b>Name :</b> NEW JERSEY AMERICAN WATER	<b>TCPA ID :</b> 4000	<b>EPA Facility ID :</b> 100000153095	<b>COMU :</b> 0310
<b>Mail Addr :</b> 213 CARRIAGE LN	DELRAN TWP, NJ 08075	<b>Cty :</b> BURLINGTON	
<b>Location :</b> 213 CARRIAGE LN	DELRAN TWP, NJ 08075	<b>Mun :</b> DELRAN TWP	
<b>RMP Contact :</b> DAVID FORCINITO, PRODUCTION MANAGER	<b>Phone :</b> (856) 764-4903	<b>Status :</b> Registered	

<b>Name :</b> STEPAN CO	<b>TCPA ID :</b> 5187	<b>EPA Facility ID :</b>	<b>COMU :</b> 0314
<b>Mail Addr :</b> 201 FOURTH ST	FIELDSBORO, NJ 08505-1108	<b>Cty :</b> BURLINGTON	
<b>Location :</b> 201 FOURTH ST	FIELDSBORO, NJ 08505-1108	<b>Mun :</b> FIELDSBORO BORO	
<b>RMP Contact :</b> DANIEL R CALLAHAN, PRODUCTION SUPT	<b>Phone :</b> (609) 298-1222	<b>Status :</b> Registered	

<b>Name :</b> GARELICK FARMS LLC	<b>TCPA ID :</b> 5368	<b>EPA Facility ID :</b> 100000185177	<b>COMU :</b> 0315
<b>Mail Addr :</b> 117 CUMBERLAND BLVD	BURLINGTON, NJ 08016	<b>Cty :</b> BURLINGTON	
<b>Location :</b> 117 CUMBERLAND BLVD	FLORENCE TWP, NJ 08518	<b>Mun :</b> FLORENCE TWP	
<b>RMP Contact :</b> ERIC BAYER, PLANT MANAGER	<b>Phone :</b> (800) 648-0135	<b>Status :</b> Registered	
	Ext. 81617		

<b>Name :</b> CVC SPECIALTY CHEMICALS INC	<b>TCPA ID :</b> 5030	<b>EPA Facility ID :</b> 100000151444	<b>COMU :</b> 0319
<b>Mail Addr :</b> 2980 RT 73 N	MAPLE SHADE, NJ 08052	<b>Cty :</b> BURLINGTON	
<b>Location :</b> 2980 RT 73 N (AT THE RR BRIDGE)	MAPLE SHADE, NJ 08052	<b>Mun :</b> MAPLE SHADE TWP	
<b>RMP Contact :</b> PATRICK J FRISCIA, HSE MGR	<b>Phone :</b> (856) 533-3032	<b>Status :</b> Registered	

**State of New Jersey**  
**Department of Environmental Protection**  
**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

<b>Name :</b> JOINT BASE MCGUIRE DIX LAKEHURST	<b>TCPA ID :</b> 0253	<b>EPA Facility ID :</b>	<b>COMU :</b> 0325
<b>Mail Addr :</b> 2403 VANDENBERG AVE	MCGUIRE AFB, NJ	08641-5104	<b>Cty :</b> BURLINGTON
<b>Location :</b> 2403 VANDENBERG AVE	MCGUIRE AFB, NJ	08641-5104	<b>Mun :</b> NEW HANOVER TWP
<b>RMP Contact :</b> JOSEPH RHYNER, ENV. ENGINEER		<b>Phone :</b> (609) 754-2768	<b>Status :</b> Registered

<b>Name :</b> STATE METAL INDUSTRIES INC	<b>TCPA ID :</b> 5348	<b>EPA Facility ID :</b> 100000085828	<b>COMU :</b> 0408
<b>Mail Addr :</b> P O BOX 1407, 941 S 2ND ST	CAMDEN, NJ	08101-1407	<b>Cty :</b> CAMDEN
<b>Location :</b> 941 S 2ND ST	CAMDEN CITY, NJ	08101-1407	<b>Mun :</b> CAMDEN CITY
<b>RMP Contact :</b> RICHARD J KUHL, EXEC VICE PRESIDENT		<b>Phone :</b> (856) 964-1510	<b>Status :</b> Registered

<b>Name :</b> DOW CHEMICAL COMPANY, THE	<b>TCPA ID :</b> 5448	<b>EPA Facility ID :</b> 100000186764	<b>COMU :</b> 0427
<b>Mail Addr :</b> 1500 JOHN TIPTON BLVD	PENNSAUKEN TWP, NJ	08110	<b>Cty :</b> CAMDEN
<b>Location :</b> 1500 JOHN TIPTON BLVD	PENNSAUKEN TWP, NJ	08110	<b>Mun :</b> PENNSAUKEN TWP
<b>RMP Contact :</b> CHARLES HOFFMAN, EHS DELIVERY TECH.		<b>Phone :</b> (856) 663-2626	<b>Status :</b> Registered
		Ext. 24	

<b>Name :</b> CAPE MAY COUNTY MUA	<b>TCPA ID :</b> 0419	<b>EPA Facility ID :</b> 100000011925	<b>COMU :</b> 0506
<b>Mail Addr :</b> PO BOX 610, 1593 RT 9 N	CAPE MAY COURT HOUSE, NJ	08210-0610	<b>Cty :</b> CAPE MAY
<b>Location :</b> 2701 RT 47 S	RIO GRANDE, NJ	08242-0761	<b>Mun :</b> MIDDLE TWP
<b>RMP Contact :</b> STASH DMYTRACH, REGIONAL SUPV		<b>Phone :</b> (609) 465-9026	<b>Status :</b> Registered

<b>Name :</b> SOUTH JERSEY TERMINAL LLC	<b>TCPA ID :</b> 5785	<b>EPA Facility ID :</b> 100000216394	<b>COMU :</b> 0601
<b>Mail Addr :</b> 1709 S BURLINGTON ROAD	BRIDGETON, NJ	08302	<b>Cty :</b> CUMBERLAND
<b>Location :</b> 1709 S BURLINGTON ROAD	BRIDGETON, NJ	08302	<b>Mun :</b> BRIDGETON CITY
<b>RMP Contact :</b> DEBRA SOVAY, E H & S MANAGER		<b>Phone :</b> (661) 808-9168	<b>Status :</b> Registered

<b>Name :</b> SEABROOK BROTHERS & SONS INC	<b>TCPA ID :</b> 5315	<b>EPA Facility ID :</b> 100000017279	<b>COMU :</b> 0613
<b>Mail Addr :</b> P O BOX 5103, 85 FINLEY RD	SEABROOK, NJ	08302-5103	<b>Cty :</b> CUMBERLAND
<b>Location :</b> 85 FINLEY RD	UPPER DEERFIELD TWP, NJ	08302-5103	<b>Mun :</b> UPPER DEERFIELD TWP
<b>RMP Contact :</b> WILLIAM L ROBINSON, CHIEF OPER ENGINEER		<b>Phone :</b> (856) 455-8080	<b>Status :</b> Registered

<b>Name :</b> BRIDOR USA INC	<b>TCPA ID :</b> 5425	<b>EPA Facility ID :</b> 100000174063	<b>COMU :</b> 0614
<b>Mail Addr :</b> 2260 INDUSTRIAL WAY	VINELAND, NJ	08360	<b>Cty :</b> CUMBERLAND
<b>Location :</b> 2260 INDUSTRIAL WAY	VINELAND, NJ	08360	<b>Mun :</b> VINELAND CITY
<b>RMP Contact :</b> GEORGE P. MARTYNUK, CHIEF ENGINEER		<b>Phone :</b> (856) 691-8000	<b>Status :</b> Registered
		Ext. 306	

<b>Name :</b> CASA DI BERTACCHI CORP	<b>TCPA ID :</b> 5393	<b>EPA Facility ID :</b> 100000092847	<b>COMU :</b> 0614
<b>Mail Addr :</b> 1910 GALLAGHER DR, VINELAND INDUSTRIAL PARK	VINELAND, NJ	08360	<b>Cty :</b> CUMBERLAND
<b>Location :</b> VINELAND IND PARK 1910 GALLAGHER DR	VINELAND, NJ	08360	<b>Mun :</b> VINELAND CITY
<b>RMP Contact :</b> TONY NARDELLO, CHIEF OPP ENGINEER		<b>Phone :</b> (856) 696-5600	<b>Status :</b> Registered

<b>Name :</b> NEW JERSEY AMERICAN WATER	<b>TCPA ID :</b> 0603	<b>EPA Facility ID :</b> 100000065715	<b>COMU :</b> 0712
<b>Mail Addr :</b> 167 JFK PARKWAY	SHORT HILLS, NJ	07078	<b>Cty :</b> ESSEX
<b>Location :</b> 167 JFK PARKWAY	SHORT HILLS, NJ	07078	<b>Mun :</b> MILLBURN TWP
<b>RMP Contact :</b> PAUL DENNING, PRODUCTION MANAGER		<b>Phone :</b> (973) 564-5731	<b>Status :</b> Registered

**State of New Jersey**  
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**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

<b>Name :</b> BENJAMIN MOORE & COMPANY	<b>TCPA ID :</b> 5388	<b>EPA Facility ID :</b> 100000026795	<b>COMU :</b> 0714
<b>Mail Addr :</b> 134 LISTER AVE	NEWARK, NJ 07105		<b>Cty :</b> ESSEX
<b>Location :</b> 134 LISTER AVE	NEWARK, NJ 07105		<b>Mun :</b> NEWARK CITY
<b>RMP Contact :</b> RONALD DEFROSCIA, EHS PROCESS MANAGER		<b>Phone :</b> (201) 573-9600	<b>Status :</b> Registered

<b>Name :</b> CARDOLITE CORP	<b>TCPA ID :</b> 5396	<b>EPA Facility ID :</b> 100000053997	<b>COMU :</b> 0714
<b>Mail Addr :</b> 500 DOREMUS AVE	NEWARK, NJ 07105-4805		<b>Cty :</b> ESSEX
<b>Location :</b> 500 DOREMUS AVE	NEWARK, NJ 07105-4805		<b>Mun :</b> NEWARK CITY
<b>RMP Contact :</b> PRESTON HYKES, SENIOR ENGINEER		<b>Phone :</b> (973) 344-5015 Ext. 158	<b>Status :</b> Registered

<b>Name :</b> DELTECH RESIN COMPANY	<b>TCPA ID :</b> 5024	<b>EPA Facility ID :</b> 100000028123	<b>COMU :</b> 0714
<b>Mail Addr :</b> 49 RUTHERFORD ST	NEWARK, NJ 07105		<b>Cty :</b> ESSEX
<b>Location :</b> 49 RUTHERFORD ST	NEWARK, NJ 07105		<b>Mun :</b> NEWARK CITY
<b>RMP Contact :</b> ROBERT BETZ, OPERATIONS MGR		<b>Phone :</b> (973) 589-0880	<b>Status :</b> Registered

<b>Name :</b> ELAN INCORPORATED	<b>TCPA ID :</b> 5091	<b>EPA Facility ID :</b> 100000004522	<b>COMU :</b> 0714
<b>Mail Addr :</b> 268 DOREMUS AVE	NEWARK, NJ 07105		<b>Cty :</b> ESSEX
<b>Location :</b> 268 DOREMUS AVE	NEWARK, NJ 07105		<b>Mun :</b> NEWARK CITY
<b>RMP Contact :</b> THOMAS JONES, PLANT ENGINEER		<b>Phone :</b> (973) 344-8014 Ext. 106	<b>Status :</b> Registered

<b>Name :</b> SUNOCO PARTNERS MKTG & TERMINAL LP NEWAR	<b>TCPA ID :</b> 5829	<b>EPA Facility ID :</b> 100000216456	<b>COMU :</b> 0714
<b>Mail Addr :</b> 436 DOREMUS AVE	NEWARK, NJ 07105		<b>Cty :</b> ESSEX
<b>Location :</b> 436 DOREMUS AVE	NEWARK, NJ 07105		<b>Mun :</b> NEWARK CITY
<b>RMP Contact :</b> ROBERT GRAY, NE TERMINAL MANAGER		<b>Phone :</b> (973) 465-3200	<b>Status :</b> Registered

<b>Name :</b> WELCO ACETYLENE CORP	<b>TCPA ID :</b> 5572	<b>EPA Facility ID :</b> 100000200935	<b>COMU :</b> 0714
<b>Mail Addr :</b> 321 ROANOKE AVE	NEWARK CITY, NJ 07105		<b>Cty :</b> ESSEX
<b>Location :</b> 321 ROANOKE AVE	NEWARK CITY, NJ 07105		<b>Mun :</b> NEWARK CITY
<b>RMP Contact :</b> JOHN J. SMITH, VICE PRESIDENT		<b>Phone :</b> (973) 465-1043	<b>Status :</b> Registered

<b>Name :</b> AL & JOHN INC (DBA) GLEN ROCK HAMS	<b>TCPA ID :</b> 5725	<b>EPA Facility ID :</b> 100000217605	<b>COMU :</b> 0721
<b>Mail Addr :</b> 147 CLINTON RD	WEST CALDWELL, NJ 07006		<b>Cty :</b> ESSEX
<b>Location :</b> 147 CLINTON RD	WEST CALDWELL, NJ 07006-6601		<b>Mun :</b> WEST CALDWELL BORO
<b>RMP Contact :</b> JENNIFER OLDJA, CHIEF FIN. OFFICER		<b>Phone :</b> (973) 742-4990	<b>Status :</b> Registered

<b>Name :</b> PAULSBORO REFINING COMPANY LLC	<b>TCPA ID :</b> 5155	<b>EPA Facility ID :</b> 100000056734	<b>COMU :</b> 0807
<b>Mail Addr :</b> 800 BILLINGSPO RT RD	PAULSBORO, NJ 08066-1036		<b>Cty :</b> GLOUCESTER
<b>Location :</b> 800 BILLINGSPO RT RD	GREENWICH TWP, NJ 08066-0000		<b>Mun :</b> GREENWICH TWP
<b>RMP Contact :</b> CHARLES CUSICK, PSM MANAGER		<b>Phone :</b> (856) 224-6545	<b>Status :</b> Registered

<b>Name :</b> FERRO CORPORATION	<b>TCPA ID :</b> 5157	<b>EPA Facility ID :</b> 100000017983	<b>COMU :</b> 0809
<b>Mail Addr :</b> 170 RT 130 S, P O BOX 309	BRIDGEPORT, NJ 08014-0309		<b>Cty :</b> GLOUCESTER
<b>Location :</b> 170 RT 130 S	LOGAN TWP, NJ 08014-0309		<b>Mun :</b> LOGAN TWP
<b>RMP Contact :</b> KARL KRIGER, PLANT MANAGER		<b>Phone :</b> (856) 467-8226	<b>Status :</b> Registered

**State of New Jersey**  
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**TCPA Registrant Mailing List**

<b>Name :</b> LABREA BAKERY	<b>TCPA ID :</b> 5450	<b>EPA Facility ID :</b> 100000185364	<b>COMU :</b> 0809
<b>Mail Addr :</b> 11 TECHNOLOGY DR	SWEDSBORO, NJ	08085-1761	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 11 TECHNOLOGY DR	LOGAN TWP, NJ	08085-1761	<b>Mun :</b> LOGAN TWP
<b>RMP Contact :</b> GARY MCARTHUR, DIRECTOR OF ENG.		<b>Phone :</b> (856) 417-8109	<b>Status :</b> Registered

<b>Name :</b> VWR INTERNATIONAL LLC	<b>TCPA ID :</b> 5375	<b>EPA Facility ID :</b> 100000078373	<b>COMU :</b> 0809
<b>Mail Addr :</b> 2039 CENTER SQUARE RD	BRIDGEPORT, NJ	08014	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 2039 CENTER SQUARE RD	BRIDGEPORT, NJ	08014	<b>Mun :</b> LOGAN TWP
<b>RMP Contact :</b> ROBERT T. GABE, DIRECTOR DISTRIBUTION		<b>Phone :</b> (856) 467-7837	<b>Status :</b> Registered

<b>Name :</b> COIM USA INC	<b>TCPA ID :</b> 5027	<b>EPA Facility ID :</b> 100000087764	<b>COMU :</b> 0814
<b>Mail Addr :</b> 675 BILLINGSPO RT RD	PAULSBORO, NJ	08066-1030	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 675 BILLINGSPO RT RD	PAULSBORO, NJ	08066-1030	<b>Mun :</b> PAULSBORO BORO
<b>RMP Contact :</b> LUCIO SIANO, PRESIDENT		<b>Phone :</b> (856) 423-0464	<b>Status :</b> Registered

<b>Name :</b> LOGAN GENERATING CO LP	<b>TCPA ID :</b> 5395	<b>EPA Facility ID :</b> 100000085007	<b>COMU :</b> 0817
<b>Mail Addr :</b> 76 ROUTE 130 SOUTH	SWEDSBORO, NJ	08085-9300	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 76 ROUTE 130	SWEDSBORO, NJ	08085-9300	<b>Mun :</b> SWEDSBORO BORO
<b>RMP Contact :</b> PHILIP FONTENELLE, ENV. MANAGER		<b>Phone :</b> (856) 241-4575	<b>Status :</b> Registered

<b>Name :</b> COIM USA INC	<b>TCPA ID :</b> 5519	<b>EPA Facility ID :</b> 100000203317	<b>COMU :</b> 0820
<b>Mail Addr :</b> 286 MANTUA GROVE RD, BLDG 1	WEST DEPTFORD TWP, NJ	08066-1738	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 286 MANTUA GROVE RD, BLDG 1	WEST DEPTFORD TWP, NJ	08066-1738	<b>Mun :</b> WEST DEPTFORD TWP
<b>RMP Contact :</b> LUCIO SIANO, PRESIDENT		<b>Phone :</b> (856) 224-8519	<b>Status :</b> Registered

<b>Name :</b> JOHNSON MATTHEY INC	<b>TCPA ID :</b> 5141	<b>EPA Facility ID :</b> 100000043302	<b>COMU :</b> 0820
<b>Mail Addr :</b> 2001 NOLTE DR	WEST DEPTFORD TWP, NJ	08066	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 2001 NOLTE DR	WEST DEPTFORD TWP, NJ	08066	<b>Mun :</b> WEST DEPTFORD TWP
<b>RMP Contact :</b> RICH FACKLER, MANAGER, E.H. & S.		<b>Phone :</b> (856) 384-7149	<b>Status :</b> Registered

<b>Name :</b> SOLVAY SPECIALTY POLYMERS USA, LLC	<b>TCPA ID :</b> 5173	<b>EPA Facility ID :</b> 100000131733	<b>COMU :</b> 0820
<b>Mail Addr :</b> 10 LEONARD LN	THOROFARE, NJ	08086-2150	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 10 LEONARD LN	THOROFARE, NJ	08086-2150	<b>Mun :</b> WEST DEPTFORD TWP
<b>RMP Contact :</b> GEOFFREY PASS, PLANT MANAGER		<b>Phone :</b> (856) 853-8119	<b>Status :</b> Registered

<b>Name :</b> SUNOCO PARTNERS MARKETING & TERMINALS LP	<b>TCPA ID :</b> 5073	<b>EPA Facility ID :</b> 100000051775	<b>COMU :</b> 0820
<b>Mail Addr :</b> 1000 CROWN POINT ROAD (RT. 130)	WEST DEPTFORD TWP, NJ	08093-1000	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 1000 CROWN POINT ROAD (RT. 130)	WEST DEPTFORD TWP, NJ	08093-1000	<b>Mun :</b> WEST DEPTFORD TWP
<b>RMP Contact :</b> ROBERT GRAY, NE TERMINALS MANAGER		<b>Phone :</b> (856) 933-5270	<b>Status :</b> Registered

<b>Name :</b> GRASSO FOODS INC.	<b>TCPA ID :</b> 5521	<b>EPA Facility ID :</b> 100000194345	<b>COMU :</b> 0824
<b>Mail Addr :</b> 2111 KINGS HWY, P.O. BOX 127	WOOLWICH TWP, NJ	08085	<b>Cty :</b> GLOUCESTER
<b>Location :</b> 9 OGDEN ROAD	WOOLWICH TWP, NJ	08085	<b>Mun :</b> WOOLWICH TWP
<b>RMP Contact :</b> JOHN MAUL, CHIEF OPERATIONS MGR		<b>Phone :</b> (856) 467-2223	<b>Status :</b> Registered

**State of New Jersey**  
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**TCPA Registrant Mailing List**

<b>Name :</b> BAYONNE PLANT HOLDING LLC	<b>TCPA ID :</b> 5310	<b>EPA Facility ID :</b> 100000064379	<b>COMU :</b> 0901
<b>Mail Addr :</b> 10 HOOK RD	BAYONNE, NJ 07002		<b>Cty :</b> HUDSON
<b>Location :</b> 10 HOOK RD	BAYONNE, NJ 07002		<b>Mun :</b> BAYONNE CITY
<b>RMP Contact :</b> DAVID LLEWELYN, FACILITY MANAGER		<b>Phone :</b> (201) 437-0473	<b>Status :</b> Registered

<b>Name :</b> IMTT BAYONNE	<b>TCPA ID :</b> 5411	<b>EPA Facility ID :</b> 100000038835	<b>COMU :</b> 0901
<b>Mail Addr :</b> 250 E 22ND ST	BAYONNE, NJ 07002		<b>Cty :</b> HUDSON
<b>Location :</b> 250 E 22ND ST	BAYONNE, NJ 07002		<b>Mun :</b> BAYONNE CITY
<b>RMP Contact :</b> NIRAV D. PATEL, ENV COMPLIANCE MGR		<b>Phone :</b> (201) 437-2200 Ext. 5223	<b>Status :</b> Registered

<b>Name :</b> MURALO COMPANY, INC.	<b>TCPA ID :</b> 5412	<b>EPA Facility ID :</b> 100000051187	<b>COMU :</b> 0901
<b>Mail Addr :</b> 148 E 5TH ST, P.O. BOX 455	BAYONNE, NJ 07002-0455		<b>Cty :</b> HUDSON
<b>Location :</b> 148 E 5TH ST	BAYONNE, NJ 07002-0455		<b>Mun :</b> BAYONNE CITY
<b>RMP Contact :</b> EDWARD F. NORTON III, VP OF OPERATIONS		<b>Phone :</b> (201) 437-0770 Ext. 251	<b>Status :</b> Registered

<b>Name :</b> PSEG FOSSIL LLC	<b>TCPA ID :</b> 5193	<b>EPA Facility ID :</b>	<b>COMU :</b> 0906
<b>Mail Addr :</b> DUFFIELD AND VAN KEUREN AVENUES	JERSEY CITY, NJ 07306		<b>Cty :</b> HUDSON
<b>Location :</b> DUFFIELD AND VAN KEUREN AVENUES	JERSEY CITY, NJ 07306		<b>Mun :</b> JERSEY CITY
<b>RMP Contact :</b> STANIA F. CORTRIGHT, SR.ENV.ENGINEER		<b>Phone :</b> (201) 217-3672	<b>Status :</b> Registered

<b>Name :</b> TROPICANA PRODUCTS INC	<b>TCPA ID :</b> 5373	<b>EPA Facility ID :</b> 100000062399	<b>COMU :</b> 0906
<b>Mail Addr :</b> 9 LINDEN AVE E	JERSEY CITY, NJ 07305		<b>Cty :</b> HUDSON
<b>Location :</b> 9 LINDEN AVE E	JERSEY CITY, NJ 07305		<b>Mun :</b> JERSEY CITY
<b>RMP Contact :</b> ANNE LEEKS, HSE MANAGER		<b>Phone :</b> (201) 395-6011	<b>Status :</b> Registered

<b>Name :</b> KUEHNE CHEMICAL CO INC	<b>TCPA ID :</b> 5148	<b>EPA Facility ID :</b> 100000025215	<b>COMU :</b> 0907
<b>Mail Addr :</b> 86 N HACKENSACK AVE	KEARNY, NJ 07032-4675		<b>Cty :</b> HUDSON
<b>Location :</b> 86 N HACKENSACK AVE	KEARNY, NJ 07032-4675		<b>Mun :</b> KEARNY TOWN
<b>RMP Contact :</b> PAUL A. TAUBLER, MGR. REG. AFFAIRS		<b>Phone :</b> (973) 589-0700 Ext. 134	<b>Status :</b> Registered

<b>Name :</b> RINCHEM COMPANY INC	<b>TCPA ID :</b> 5758	<b>EPA Facility ID :</b>	<b>COMU :</b> 1009
<b>Mail Addr :</b> 55 RIVER RD	FLEMINGTON, NJ 08822		<b>Cty :</b> HUNTERDON
<b>Location :</b> 55 RIVER RD	FLEMINGTON, NJ 08822		<b>Mun :</b> FLEMINGTON BORO
<b>RMP Contact :</b> BONNIE CLEMENTS, FACILITY MANAGER		<b>Phone :</b> (908) 905-0216	<b>Status :</b> Registered

<b>Name :</b> JOHANNA FOODS INC	<b>TCPA ID :</b> 5338	<b>EPA Facility ID :</b> 100000148164	<b>COMU :</b> 1021
<b>Mail Addr :</b> P O BOX 272	FLEMINGTON, NJ 08822-0272		<b>Cty :</b> HUNTERDON
<b>Location :</b> JOHANNA FARMS RD	FLEMINGTON, NJ 08822-0272		<b>Mun :</b> RARITAN TWP
<b>RMP Contact :</b> BRASINGTON BEAKLEY, VP CHILLED OPERATIONS		<b>Phone :</b> (908) 788-2200	<b>Status :</b> Registered

<b>Name :</b> READINGTON FARMS INC	<b>TCPA ID :</b> 5367	<b>EPA Facility ID :</b> 100000186755	<b>COMU :</b> 1022
<b>Mail Addr :</b> P O BOX 164, 12 MILL RD	WHITEHOUSE, NJ 08888-0164		<b>Cty :</b> HUNTERDON
<b>Location :</b> 12 MILL RD	WHITEHOUSE, NJ 08888-0164		<b>Mun :</b> READINGTON TWP
<b>RMP Contact :</b> DONALD K MERRIGAN, PRESIDENT/RESP. MGR.		<b>Phone :</b> (908) 534-2121	<b>Status :</b> Registered

**State of New Jersey**  
**Department of Environmental Protection**  
**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

<b>Name :</b> PSEG FOSSIL LLC	<b>TCPA ID :</b> 5196	<b>EPA Facility ID :</b> 100000185792	<b>COMU :</b> 1103
<b>Mail Addr :</b> 2512 LAMBERTON RD	HAMILTON TWP, NJ 08611	<b>Cty :</b> MERCER	
<b>Location :</b> 2512 LAMBERTON RD	HAMILTON TWP, NJ 08611	<b>Mun :</b> HAMILTON TWP	
<b>RMP Contact :</b> MARK D. SCHWARTZKOPF, SR.ENVIRONMENTAL ENG.		<b>Phone :</b> (609) 599-7004	<b>Status :</b> Registered

<b>Name :</b> TRENTON CITY OF	<b>TCPA ID :</b> 1011	<b>EPA Facility ID :</b> 100000008662	<b>COMU :</b> 1111
<b>Mail Addr :</b> P O BOX 528, RT 29 EAST WEST HIGHWAY	TRENTON, NJ 08604-0528	<b>Cty :</b> MERCER	
<b>Location :</b> RT 29 EAST WEST HIGHWAY	TRENTON, NJ 08604-0528	<b>Mun :</b> TRENTON CITY	
<b>RMP Contact :</b> LUIS MOLLINEDO, DIRECTOR P. W.		<b>Phone :</b> (609) 989-3208	<b>Status :</b> Registered

<b>Name :</b> KINDER MORGAN LIQUIDS TERMINALS LLC	<b>TCPA ID :</b> 5413	<b>EPA Facility ID :</b> 100000116796	<b>COMU :</b> 1201
<b>Mail Addr :</b> 78 LAFAYETTE ST	CARTERET, NJ 07008	<b>Cty :</b> MIDDLESEX	
<b>Location :</b> 78 LAFAYETTE ST	CARTERET, NJ 07008	<b>Mun :</b> CARTERET BORO	
<b>RMP Contact :</b> MAX KATZ, EHS MANAGER		<b>Phone :</b> (732) 541-5161	<b>Status :</b> Registered

<b>Name :</b> EQUISTAR CHEMICALS LP	<b>TCPA ID :</b> 5186	<b>EPA Facility ID :</b> 100000090849	<b>COMU :</b> 1205
<b>Mail Addr :</b> 340 MEADOW RD	EDISON, NJ 08817-5571	<b>Cty :</b> MIDDLESEX	
<b>Location :</b> 340 MEADOW RD	EDISON, NJ 08817-5571	<b>Mun :</b> EDISON TWP	
<b>RMP Contact :</b> JAMES BUTLER, SR. PROCESS ENGINEER		<b>Phone :</b> (732) 985-6262	<b>Status :</b> Registered

<b>Name :</b> MOBIL CHEMICAL COMPANY	<b>TCPA ID :</b> 5394	<b>EPA Facility ID :</b>	<b>COMU :</b> 1205
<b>Mail Addr :</b> 2195 HWY 27 & VINEYARD RD	EDISON, NJ 08818-3140	<b>Cty :</b> MIDDLESEX	
<b>Location :</b> 2195 HWY 27 & VINEYARD RD	EDISON TWP, NJ 08818-3140	<b>Mun :</b> EDISON TWP	
<b>RMP Contact :</b> JOHN R. BOYE, SHE MANAGER		<b>Phone :</b> (732) 321-6059	<b>Status :</b> Registered

<b>Name :</b> W R GRACE & CO - CONN	<b>TCPA ID :</b> 5508	<b>EPA Facility ID :</b> 100000197048	<b>COMU :</b> 1205
<b>Mail Addr :</b> 340 MEADOW RD	EDISON TWP, NJ 08817-5571	<b>Cty :</b> MIDDLESEX	
<b>Location :</b> 340 MEADOW RD	EDISON TWP, NJ 08817-5571	<b>Mun :</b> EDISON TWP	
<b>RMP Contact :</b> HEMU MEHTA, TECHNICAL MGR		<b>Phone :</b> (732) 777-2225	<b>Status :</b> Registered

<b>Name :</b> DUPONT DE NEMOURS E I & COMPANY INC	<b>TCPA ID :</b> 5085	<b>EPA Facility ID :</b> 100000131163	<b>COMU :</b> 1219
<b>Mail Addr :</b> 250 CHEESEQUAKE RD	PARLIN, NJ 08859	<b>Cty :</b> MIDDLESEX	
<b>Location :</b> 250 CHEESEQUAKE RD	PARLIN, NJ 08859	<b>Mun :</b> SAYREVILLE BORO	
<b>RMP Contact :</b> HAROLD J. KIRBY, PLANT MGR		<b>Phone :</b> (732) 613-2533	<b>Status :</b> Registered

<b>Name :</b> HERCULES INC	<b>TCPA ID :</b> 5125	<b>EPA Facility ID :</b> 100000052676	<b>COMU :</b> 1219
<b>Mail Addr :</b> 50 S MINISINK AVE	PARLIN, NJ 08859-1089	<b>Cty :</b> MIDDLESEX	
<b>Location :</b> 50 S MINISINK AVE	PARLIN, NJ 08859-1089	<b>Mun :</b> SAYREVILLE BORO	
<b>RMP Contact :</b> ANDRE SIMMONS, PLANT MGR		<b>Phone :</b> (732) 254-1234	<b>Status :</b> Registered

<b>Name :</b> AIR LIQUIDE AMERICA SPECIALTY GASES LLC	<b>TCPA ID :</b> 5309	<b>EPA Facility ID :</b> 100000001703	<b>COMU :</b> 1222
<b>Mail Addr :</b> 2330 HAMILTON BLVD	SOUTH PLAINFIELD, NJ 07080-3104	<b>Cty :</b> MIDDLESEX	
<b>Location :</b> 2330 HAMILTON BLVD	SOUTH PLAINFIELD BORO, NJ 07080-3104	<b>Mun :</b> SOUTH PLAINFIELD BORO	
<b>RMP Contact :</b> TIM DALL, PLANT MANAGER		<b>Phone :</b> (908) 754-7700	<b>Status :</b> Registered



**State of New Jersey**  
**Department of Environmental Protection**  
**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

<b>Name :</b> HESS CORPORATION	<b>TCPA ID :</b> 5036	<b>EPA Facility ID :</b> 100000137041	<b>COMU :</b> 1225
<b>Mail Addr :</b> 1 HESS PLZ	WOODBIDGE, NJ	07095-0961	<b>Cty :</b> MIDDLESEX
<b>Location :</b> 750 CLIFF RD	PORT READING, NJ	07064	<b>Mun :</b> WOODBRIDGE TWP
<b>RMP Contact :</b> DARRYL T. HARRIS, DIRECTOR		<b>Phone :</b> (732) 750-7800	<b>Status :</b> Registered

<b>Name :</b> NEW JERSEY AMERICAN WATER	<b>TCPA ID :</b> 1252	<b>EPA Facility ID :</b> 100000065895	<b>COMU :</b> 1309
<b>Mail Addr :</b> 310 SWIMMING RIVER ROAD	COLTS NECK, NJ	07722	<b>Cty :</b> MONMOUTH
<b>Location :</b> 310 SWIMMING RIVER ROAD	COLTS NECK, NJ	07722	<b>Mun :</b> COLTS NECK TWP
<b>RMP Contact :</b> JUAN DONOSO, PRODUCTION MANAGER		<b>Phone :</b> (732) 741-8924	<b>Status :</b> Registered

<b>Name :</b> NESTLE USA - BEVERAGE DIVISION INC	<b>TCPA ID :</b> 5021	<b>EPA Facility ID :</b> 100000074091	<b>COMU :</b> 1316
<b>Mail Addr :</b> 61 JERSEYVILLE AVE	FREEHOLD, NJ	07728	<b>Cty :</b> MONMOUTH
<b>Location :</b> 61 JERSEYVILLE AVE	FREEHOLD TWP, NJ	07728	<b>Mun :</b> FREEHOLD TWP
<b>RMP Contact :</b> IAIN REED, PLANT MANAGER		<b>Phone :</b> (732) 462-1300	<b>Status :</b> Registered

<b>Name :</b> NEW JERSEY AMERICAN WATER	<b>TCPA ID :</b> 1223	<b>EPA Facility ID :</b> 100000063851	<b>COMU :</b> 1334
<b>Mail Addr :</b> 611 OLD CORLIES AVE	NEPTUNE, NJ	07753	<b>Cty :</b> MONMOUTH
<b>Location :</b> 611 OLD CORLIES AVE	NEPTUNE, NJ	07753	<b>Mun :</b> NEPTUNE TWP
<b>RMP Contact :</b> JUAN DONOSO, PRODUCTION MANAGER		<b>Phone :</b> (732) 918-0971	<b>Status :</b> Registered

<b>Name :</b> BRICK TOWNSHIP MUA	<b>TCPA ID :</b> 1405	<b>EPA Facility ID :</b> 100000069748	<b>COMU :</b> 1506
<b>Mail Addr :</b> 1551 HWY 88 W	BRICK TWP, NJ	08724-2399	<b>Cty :</b> OCEAN
<b>Location :</b> 1551 HWY 88 W	BRICK TWP, NJ	08724-2399	<b>Mun :</b> BRICK TWP
<b>RMP Contact :</b> JOSEPH MAGGIO, DIR OF WATER QUALITY		<b>Phone :</b> (732) 458-7000	<b>Status :</b> Registered

<b>Name :</b> CHURCH & DWIGHT CO INC	<b>TCPA ID :</b> 5408	<b>EPA Facility ID :</b> 100000106495	<b>COMU :</b> 1514
<b>Mail Addr :</b> 800 AIRPORT RD	LAKEWOOD, NJ	08701	<b>Cty :</b> OCEAN
<b>Location :</b> 800 AIRPORT RD 2ND FLOOR	LAKEWOOD, NJ	08701	<b>Mun :</b> LAKEWOOD TWP
<b>RMP Contact :</b> RONALD SPRINGFIELD, ENV. ENGINEER		<b>Phone :</b> (732) 730-3100	<b>Status :</b> Registered

<b>Name :</b> PASSAIC VALLEY WATER COMMISSION	<b>TCPA ID :</b> 1507	<b>EPA Facility ID :</b> 100000082849	<b>COMU :</b> 1612
<b>Mail Addr :</b> 1525 MAIN AVE	CLIFTON, NJ	07011-2195	<b>Cty :</b> PASSAIC
<b>Location :</b> 800 UNION BOULEVARD	TOTOWA, NJ	07512-2738	<b>Mun :</b> TOTOWA BORO
<b>RMP Contact :</b> GEORGE LEWIS, INDUSTRIAL HYGIENIST		<b>Phone :</b> (973) 340-4300	<b>Status :</b> Registered

<b>Name :</b> NEWARK CITY OF NWCDC	<b>TCPA ID :</b> 0610	<b>EPA Facility ID :</b> 100000111666	<b>COMU :</b> 1615
<b>Mail Addr :</b> 1294 MCBRIDE AVE	LITTLE FALLS, NJ	07424-0000	<b>Cty :</b> PASSAIC
<b>Location :</b> 2224 RT 23 N	WEST MILFORD TWP, NJ	07480-0000	<b>Mun :</b> WEST MILFORD TWP
<b>RMP Contact :</b> ANDREW PAPPACHEN, DIR OF OPERATIONS		<b>Phone :</b> (973) 697-5458	<b>Status :</b> Registered

<b>Name :</b> LUBRIZOL ADVANCED MATERIALS INC	<b>TCPA ID :</b> 5379	<b>EPA Facility ID :</b> 100000132126	<b>COMU :</b> 1706
<b>Mail Addr :</b> 76 PORCUPINE RD	PEDRICKTOWN, NJ	08067	<b>Cty :</b> SALEM
<b>Location :</b> 76 PORCUPINE RD	PEDRICKTOWN, NJ	08067	<b>Mun :</b> OLDMANS TWP
<b>RMP Contact :</b> CHUCK MCCANN, HEALTH SAF. ENV. MGR.		<b>Phone :</b> (856) 351-2116	<b>Status :</b> Registered

**State of New Jersey**  
**Department of Environmental Protection**  
**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

<b>Name :</b> MEXICHEM SPECIALTY RESINS, INC.	<b>TCPA ID :</b> 5114	<b>EPA Facility ID :</b> 100000131957	<b>COMU :</b> 1706
<b>Mail Addr :</b> P O BOX 420, RT 130 AND PORCUPINE RD	PEDRICKTOWN, NJ	08067	<b>Cty :</b> SALEM
<b>Location :</b> RT 130 AND PORCUPINE RD	PEDRICKTOWN, NJ	08067-0400	<b>Mun :</b> OLDMANS TWP
<b>RMP Contact :</b> OTIS J. SISTRUNK, SFTY/ENV ENGINEER		<b>Phone :</b> (856) 299-8413	<b>Status :</b> Registered

<b>Name :</b> OXY VINYLs LP	<b>TCPA ID :</b> 5387	<b>EPA Facility ID :</b> 100000118446	<b>COMU :</b> 1706
<b>Mail Addr :</b> PO BOX 411, RT 130 & PORCUPINE RD	PEDRICKTOWN, NJ	08067-0000	<b>Cty :</b> SALEM
<b>Location :</b> RT 130 & PORCUPINE RD	OLDMANS TWP, NJ	08067-0000	<b>Mun :</b> OLDMANS TWP
<b>RMP Contact :</b> THOMAS J. WUTKA, PLANT MANAGER		<b>Phone :</b> (856) 299-8498	<b>Status :</b> Registered

<b>Name :</b> DUPONT DE NEMOURS E I & COMPANY INC	<b>TCPA ID :</b> 5086	<b>EPA Facility ID :</b> 100000100712	<b>COMU :</b> 1708
<b>Mail Addr :</b> RT 130 CHAMBERS WORKS	DEEPWATER, NJ	08023	<b>Cty :</b> SALEM
<b>Location :</b> US 130 AND CANAL RD	DEEPWATER, NJ	08023	<b>Mun :</b> PENNSVILLE TWP
<b>RMP Contact :</b> MICHAEL L. CRISSEY, SITE SHE MANAGER		<b>Phone :</b> (856) 540-2418	<b>Status :</b> Registered

<b>Name :</b> SIEGFRIED (USA) LLC	<b>TCPA ID :</b> 5110	<b>EPA Facility ID :</b> 100000116536	<b>COMU :</b> 1708
<b>Mail Addr :</b> 33 INDUSTRIAL PARK RD	PENNSVILLE, NJ	08070	<b>Cty :</b> SALEM
<b>Location :</b> 33 INDUSTRIAL PARK RD	PENNSVILLE, NJ	08070	<b>Mun :</b> PENNSVILLE TWP
<b>RMP Contact :</b> TIM MCMORROW, DIR SITE SUPPORT		<b>Phone :</b> (856) 678-3601	<b>Status :</b> Registered

<b>Name :</b> CHAMBERS COGENERATION LP	<b>TCPA ID :</b> 5405	<b>EPA Facility ID :</b> 100000100534	<b>COMU :</b> 1713
<b>Mail Addr :</b> 500 SHELL RD	CARNEY'S POINT, NJ	08069	<b>Cty :</b> SALEM
<b>Location :</b> 500 SHELL RD	CARNEY'S POINT, NJ	08069	<b>Mun :</b> CARNEY'S POINT TWP
<b>RMP Contact :</b> ROLF DINSMORE, ENV COMPLIANCE SUP		<b>Phone :</b> (856) 299-1300 Ext. 25	<b>Status :</b> Registered

<b>Name :</b> MCLANE COMPANY INC	<b>TCPA ID :</b> 5468	<b>EPA Facility ID :</b> 100000217525	<b>COMU :</b> 1713
<b>Mail Addr :</b> 4747 MCLANE PARKWAY	TEMPLE, TX	76503	<b>Cty :</b> SALEM
<b>Location :</b> 742 COURSES LANDING RD	CARNEY'S POINT TWP, NJ	08069	<b>Mun :</b> CARNEY'S POINT TWP
<b>RMP Contact :</b> MAT BOWEN, GENERAL MANAGER		<b>Phone :</b> (856) 351-6201	<b>Status :</b> Registered

<b>Name :</b> AMERICAN SPRAYTECH LLC	<b>TCPA ID :</b> 5742	<b>EPA Facility ID :</b> 100000190134	<b>COMU :</b> 1805
<b>Mail Addr :</b> 205 MEISTER AVE	NORTH BRANCH, NJ	08876	<b>Cty :</b> SOMERSET
<b>Location :</b> 205 MEISTER AVE	NORTH BRANCH, NJ	08876	<b>Mun :</b> BRANCHBURG TWP
<b>RMP Contact :</b> ALLEN LALWANI, PRESIDENT		<b>Phone :</b> (908) 725-6060	<b>Status :</b> Registered

<b>Name :</b> FALCON SAFETY PRODUCTS INC	<b>TCPA ID :</b> 5414	<b>EPA Facility ID :</b> 100000080869	<b>COMU :</b> 1805
<b>Mail Addr :</b> P O BOX 1299, 25 IMCLONE DRIVE	BRANCHBURG TWP, NJ	08876-1299	<b>Cty :</b> SOMERSET
<b>Location :</b> 25 IMCLONE DRIVE	BRANCHBURG TWP, NJ	08876-1299	<b>Mun :</b> BRANCHBURG TWP
<b>RMP Contact :</b> DIANE ROBERTSON, QUALITY & SAFETY MGR		<b>Phone :</b> (908) 707-4900	<b>Status :</b> Registered

<b>Name :</b> TEKNI-PLEX INC	<b>TCPA ID :</b> 5389	<b>EPA Facility ID :</b> 100000054086	<b>COMU :</b> 1805
<b>Mail Addr :</b> 201 INDUSTRIAL PKWY	SOMERVILLE, NJ	08876	<b>Cty :</b> SOMERSET
<b>Location :</b> 201 INDUSTRIAL PKWY	BRANCHBURG TWP, NJ	08876	<b>Mun :</b> BRANCHBURG TWP
<b>RMP Contact :</b> JOHN KRATINS, PLANT MANAGER		<b>Phone :</b> (908) 722-4800	<b>Status :</b> Registered

**State of New Jersey**  
**Department of Environmental Protection**  
**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

<b>Name :</b> VOLTAIX LLC	<b>TCPA ID :</b> 5382	<b>EPA Facility ID :</b> 100000193471	<b>COMU :</b> 1805
<b>Mail Addr :</b> 197 MEISTER AVE	NORTH BRANCH, NJ 08876-6022	<b>Cty :</b> SOMERSET	
<b>Location :</b> 197 MEISTER AVE	NORTH BRANCH, NJ 08876-6022	<b>Mun :</b> BRANCHBURG TWP	
<b>RMP Contact :</b> KEVIN PARADIS, DIRECTOR ESSH		<b>Phone :</b> (908) 231-9060	<b>Status :</b> Registered

<b>Name :</b> BROOK WAREHOUSING CORP	<b>TCPA ID :</b> 5308	<b>EPA Facility ID :</b> 100000218588	<b>COMU :</b> 1806
<b>Mail Addr :</b> PO BOX 928	MANVILLE, NJ 08835	<b>Cty :</b> SOMERSET	
<b>Location :</b> 18 VAN VEGHTEN DR	BRIDGEWATER TWP, NJ 08807	<b>Mun :</b> BRIDGEWATER TWP	
<b>RMP Contact :</b> JOHN AUGER, VP ENGG. & REG. COMP.		<b>Phone :</b> (908) 809-1701	<b>Status :</b> Registered

<b>Name :</b> FISHER SCIENTIFIC CO LLC	<b>TCPA ID :</b> 5103	<b>EPA Facility ID :</b> 100000158606	<b>COMU :</b> 1806
<b>Mail Addr :</b> 755 RT 202	BRIDGEWATER TWP, NJ 08807	<b>Cty :</b> SOMERSET	
<b>Location :</b> 755 RT 202	BRIDGEWATER TWP, NJ 08807	<b>Mun :</b> BRIDGEWATER TWP	
<b>RMP Contact :</b> PAUL CUNHA, PROCESS SAFETY ENG.		<b>Phone :</b> (908) 526-1800	<b>Status :</b> Registered

<b>Name :</b> IQE RF LLC	<b>TCPA ID :</b> 5384	<b>EPA Facility ID :</b>	<b>COMU :</b> 1808
<b>Mail Addr :</b> 265 DAVIDSON AVE, SUITE 215	SOMERSET, NJ 08873	<b>Cty :</b> SOMERSET	
<b>Location :</b> 394 ELIZABETH AVE	SOMERSET, NJ 08873	<b>Mun :</b> FRANKLIN TWP	
<b>RMP Contact :</b> KEVIN SCHILD, SAFETY & FACIL. MGR.		<b>Phone :</b> (732) 271-5990 Ext. 4240	<b>Status :</b> Registered

<b>Name :</b> NEW JERSEY AMERICAN WATER	<b>TCPA ID :</b> 1003	<b>EPA Facility ID :</b> 123456789012	<b>COMU :</b> 1808
<b>Mail Addr :</b> P O BOX 102	BOUND BROOK, NJ 08805-0102	<b>Cty :</b> SOMERSET	
<b>Location :</b> 701 RANDOLPH RD	FRANKLIN TWP, NJ 08873	<b>Mun :</b> FRANKLIN TWP	
<b>RMP Contact :</b> OLEG KOSTIN, PRODUCTION MGR		<b>Phone :</b> (732) 302-3125	<b>Status :</b> Registered

<b>Name :</b> RUST-OLEUM CORPORATION	<b>TCPA ID :</b> 5646	<b>EPA Facility ID :</b> 110010294350	<b>COMU :</b> 1808
<b>Mail Addr :</b> 173 BELMONT DRIVE	SOMERSET, NJ 08875-1218	<b>Cty :</b> SOMERSET	
<b>Location :</b> 173 BELMONT DRIVE	SOMERSET, NJ 08875-1218	<b>Mun :</b> FRANKLIN TWP	
<b>RMP Contact :</b> JAMES FARRAND, PLANT MANAGER		<b>Phone :</b> (732) 469-8100	<b>Status :</b> Registered

<b>Name :</b> VEECO INSTRUMENTS INC	<b>TCPA ID :</b> 5766	<b>EPA Facility ID :</b> 100000213486	<b>COMU :</b> 1808
<b>Mail Addr :</b> 394 ELIZABETH AVE	SOMERSET, NJ 08873	<b>Cty :</b> SOMERSET	
<b>Location :</b> 394 ELIZABETH AVE	SOMERSET, NJ 08873	<b>Mun :</b> FRANKLIN TWP	
<b>RMP Contact :</b> THOMAS A. GREGO, CORPORATE MGR EH & S		<b>Phone :</b> (732) 560-5300 Ext. 4174	<b>Status :</b> Registered

<b>Name :</b> AEROPRES CORPORATION	<b>TCPA ID :</b> 5419	<b>EPA Facility ID :</b> 100000153282	<b>COMU :</b> 1810
<b>Mail Addr :</b> 318 VALLEY RD	HILLSBOROUGH, NJ 08844-4059	<b>Cty :</b> SOMERSET	
<b>Location :</b> 318 VALLEY RD	HILLSBOROUGH, NJ 08844-4059	<b>Mun :</b> HILLSBOROUGH TWP	
<b>RMP Contact :</b> DAVID WHITLOW, DIR.SFTY & TRNG		<b>Phone :</b> (908) 722-2571	<b>Status :</b> Registered

<b>Name :</b> RECKITT BENCKISER INC	<b>TCPA ID :</b> 5207	<b>EPA Facility ID :</b> 100000135613	<b>COMU :</b> 1810
<b>Mail Addr :</b> P.O. BOX 5817, 799 ROUTE 206	HILLSBOROUGH, NJ 08844	<b>Cty :</b> SOMERSET	
<b>Location :</b> 799 ROUTE 206	HILLSBOROUGH, NJ 08844	<b>Mun :</b> HILLSBOROUGH TWP	
<b>RMP Contact :</b> CAL SWEDBERG, PLANT MANAGER		<b>Phone :</b> (908) 533-2005	<b>Status :</b> Registered

**State of New Jersey**  
**Department of Environmental Protection**  
**Bureau of Release Prevention - TCPA Program**

**TCPA Registrant Mailing List**

**Name :** DIVERSIFIED CPC INTERNATIONAL INC      **TCPA ID :** 5415      **EPA Facility ID :** 100000135524      **COMU :** 1918  
**Mail Addr :** 189 HOUSES CORNER RD      SPARTA, NJ 07871      **Cty :** SUSSEX  
**Location :** 189 HOUSES CORNER RD      SPARTA, NJ 07871      **Mun :** SPARTA TWP  
**RMP Contact :** STEPHEN GRAHAM, EHSR DIRECTOR      **Phone :** (815) 424-2006      **Status :** Registered

**Name :** COGEN TECHNOLOGIES LINDEN VENTURE L P      **TCPA ID :** 5409      **EPA Facility ID :** 100000064324      **COMU :** 2009  
**Mail Addr :** P O BOX 4400      LINDEN, NJ 07036      **Cty :** UNION  
**Location :** C/O CONOCO PHILLIPS REF, RAILROAD AVE      LINDEN, NJ 07036      **Mun :** LINDEN CITY  
**RMP Contact :** ROY BELDEN, SENIOR V P      **Phone :** (908) 474-0800      **Status :** Registered

**Name :** DUPONT DE NEMOURS E I & COMPANY INC      **TCPA ID :** 5520      **EPA Facility ID :**      **COMU :** 2009  
**Mail Addr :** P.O. BOX 1429      LINDEN, NJ 07036      **Cty :** UNION  
**Location :** 1400 PARK AVENUE      LINDEN, NJ 07036      **Mun :** LINDEN CITY  
**RMP Contact :** JOSEPH R. HAUSLER, PLANT MANAGER      **Phone :** (908) 290-9113      **Status :** Registered

**Name :** INFINEUM USA LP      **TCPA ID :** 5098      **EPA Facility ID :** 100000073378      **COMU :** 2009  
**Mail Addr :** P O BOX 23      LINDEN, NJ 07036      **Cty :** UNION  
**Location :** PARK & BRUNSWICK AVE      LINDEN, NJ 07036      **Mun :** LINDEN CITY  
**RMP Contact :** THOMAS A. DEVINE, REG.COMPLIANCE LEADER      **Phone :** (908) 474-7505      **Status :** Registered

**Name :** PHILLIPS 66 COMPANY      **TCPA ID :** 5099      **EPA Facility ID :** 100000157064      **COMU :** 2009  
**Mail Addr :** 1400 PARK AVE      LINDEN, NJ 07036      **Cty :** UNION  
**Location :** 1400 PARK AVE      LINDEN, NJ 07036      **Mun :** LINDEN CITY  
**RMP Contact :** MORGAN T. WALKER, PSM/RMP/TCPA CORDINAT      **Phone :** (908) 523-6288      **Status :** Registered

**Name :** PUBLIC SERVICE ELECTRIC AND GAS CO      **TCPA ID :** 5195      **EPA Facility ID :** 100000164537      **COMU :** 2009  
**Mail Addr :** 2000 FRANK E RODGERS BLVD      HARRISON, NJ 07029      **Cty :** UNION  
**Location :** SOUTH WOOD AVE      LINDEN, NJ 07036      **Mun :** LINDEN CITY  
**RMP Contact :** JACK R. ZEREGA, M&R STATIONS/PLT.LEAD      **Phone :** (973) 430-5134      **Status :** Registered

**Name :** LINDE GAS NORTH AMERICA LLC      **TCPA ID :** 5545      **EPA Facility ID :** 100000205958      **COMU :** 2102  
**Mail Addr :** 80 INDUSTRIAL DR      ALPHA, NJ 08865      **Cty :** WARREN  
**Location :** 80 INDUSTRIAL DR      ALPHA, NJ 08865-4083      **Mun :** ALPHA BORO  
**RMP Contact :** FRED PFEIFER, PLANT MANAGER      **Phone :** (908) 777-9200      **Status :** Registered

**Name :** AVANTOR PERFORMANCE MATERIALS      **TCPA ID :** 5295      **EPA Facility ID :** 100000161095      **COMU :** 2119  
**Mail Addr :** 600 NORTH BROAD ST      PHILLIPSBURG TOWN, NJ 08865      **Cty :** WARREN  
**Location :** 600 NORTH BROAD ST      PHILLIPSBURG TOWN, NJ 08865      **Mun :** PHILLIPSBURG TOWN  
**RMP Contact :** CRAIG ROMANELLI, PLANT MANAGER      **Phone :** (908) 859-2151      **Status :** Registered

**Name :** BASF CORPORATION      **TCPA ID :** 5312      **EPA Facility ID :** 100000140698      **COMU :** 2121  
**Mail Addr :** 2 PLEASANTVIEW AVE      WASHINGTON, NJ 07882-0232      **Cty :** WARREN  
**Location :** 2 PLEASANTVIEW AVE      WASHINGTON, NJ 07882-0232      **Mun :** WASHINGTON BORO  
**RMP Contact :** MICHAEL BARONE, SITE MANAGER      **Phone :** (908) 689-6417      **Status :** Registered