

116395

# HANNOCH WEISMAN

A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW

4 BECKER FARM ROAD

ROSELAND, NEW JERSEY 07068-3788

(201) 535-5300

TELECOPIER  
(201) 994-7198

PLEASE REPLY TO:  
P.O. BOX 1040  
NEWARK, NJ 07101-9819

N.Y. TELEPHONE  
(212) 732-3262

WRITER'S DIRECT LINE: (201) 535-5341

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AMY M. RIEL

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(811-1883)

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IRA B. MARCUS  
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PETER B. BENNETT  
GERALD C. HARVEY

OF COUNSEL

JOSEPH A. WEISMAN  
WILLIAM J. HELLER  
CARMINE A. IANNACONE  
HOWARD A. KANTROWITZ

August 24, 1988

## RECEIVED

AUG 29 1988

EPA, REGION III  
OFFICE OF REGIONAL COUNSEL

34017-9

Joseph J.C. Donovan, Esq.  
3RC23  
Assistant Regional Counsel  
USEPA - Region III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Re: Novak Sanitary Landfill Site  
Suggested Follow-Up on EPA  
CERCLA §104(e) Requests/Responses

Dear Mr. Donovan:

At the meeting between EPA and PRP representatives on July 21, 1988, AT&T presented EPA with a memorandum consisting of a listing of 104(e) information request recipients whose responses cried out for further action by EPA. This letter, with the enclosed records comprising the "backup" for the recommendations made herein, supplements that earlier memo. We trust that EPA will act swiftly to send follow-up information requests and demands for responses from those who altogether failed to send EPA any information at all, and to render determinations on all outstanding claims of business confidentiality.

We also suggest that EPA ask all municipalities whose waste went to Novak to state if commercial and/or individual establishments ever have been on the same "run" as residences and if they have administered garbage recycling programs for the periods when their waste was disposed of at Novak.

AR300223

# HANNOCH WEISMAN

A PROFESSIONAL CORPORATION

Joseph J.C. Donovan, Esq.  
August 24, 1988  
Page 2

## ADDITIONAL OR EXPANDED WASTE INFORMATION

Some responding companies' waste information needs to be expanded as to type of "refuse" or "rubbish" generated. It would also be of assistance if, when these companies are requested to provide waste analyses or other more specific descriptions of the waste they generated, copies of documentation relating to the wastes, the transporters and the Novak Landfill (including any of its subsidiaries or other entities) are also requested:

Allentown Paint Manufacturing Company -- States that no records exist prior to 1979. EPA should request that company interview its employees with respect to past practices. Also, follow-up is indicated as company dealt with Valley Recycling and Hoch Sanitation.

Allentown Steel Fabricating -- admits that empty paint cans were sent to Novak. Were the cans steamed cleaned? If not, they contained hazardous substances.

Chemlawn -- States that Chemlawn does not as a matter of course dispose of hazardous materials. How did the company treat its various waste streams?

Cook Paint & Varnish -- Claims no hazardous waste was sent to Novak. This begs the question. A follow-up is indicated to determine whether hazardous substances were involved.

Electro-Chemical Engineering and Manufacturing Co. -- Company admits use of solvents. Which transporter and landfill was used for disposal?

Lehigh Structural Steel -- Claims no records indicate that company used Valley Disposal. However, documents indicate E. Schneider was transporter. Follow-up is necessary.

Polyco Dyeing & Finishing Company -- States no hazardous substances were sent to Novak. What were constituents of trash transported by Valley or Hoch?

Rodale Press -- States no hazardous waste sent to Novak. Were hazardous substances included in waste stream and did Rodale Press retain Valley Disposal as the transporter?

Wagner-Cooper Industries -- When were the constituents of the trash picked up by Hoch/Valley?

Wright Fabrics -- What was on the "rags" which were disposed?

AR300224

# HANNOCH WEISMAN

A PROFESSIONAL CORPORATION

Joseph J.C. Donovan, Esq.

August 24, 1988

Page 2

W.R. Grace (bought out Peters' Fertilizer) -- Admits sending empty boxes and drums which once contained hazardous waste. A follow-up is indicated to determine if containers still contained hazardous substances.

Safety Kleen -- Stated that no hazardous wastes were sent to the dumpster. EPA should inquire into hazardous substances contained in waste.

Allentown School District -- What were all the constituents of the trash? Were laboratory chemicals, cleaning supplies, and/or repair materials included?

Borough of Coplay -- Admits that the Borough removed trash from 48 businesses. What were the constituents of this trash? Was it commingled with residential waste?

Parkland School District -- What were the constituents of the waste stream?

In addition, some of the small haulers, while denying they hauled anything hazardous ("...I am just a small garbage man..."), have mentioned picking up for mills, and as having hauled roofing materials, empty cans and the like. It may be valuable to obtain their customer lists.

We have received information that the following entities utilized Valley Disposal; therefore, they should receive information requests:

Garnet Chemical Corp.  
Crone Plating Co.  
Pace Construction Co.  
Penn Aluminum  
(could this now be Penn Roofing & Metal?)  
Wolf Distributing

Please call with any questions.

Very truly yours,

HANNOCH WEISMAN

By Deborah S. Kinburn  
Deborah S. Kinburn

DSK:mo  
Enclosure

AR300225



Legal  
515 South Flower Street  
Mailing Address: Box 2679 - T.A.  
Los Angeles, California 90051  
Telephone 213 486 1873

John P. Meck  
Senior Attorney

December 3, 1987

**RECEIVED**

**CECQA FEDERAL ENFORCEMENT SECTION**

**DEC 08 1987**

**EPA-Region III**

Mr. Michael Towle (3H3HW12)  
United States Environmental Protection Agency  
Region III  
841 Chestnut Street, 6th Floor  
Philadelphia, PA 19107

Re: Novack Sanitary Landfill, South Whitehall Township,  
Lehigh County, Pennsylvania

Dear Mr. Towle:

This is a follow-up to our telephone conversation of November 19, 1987 concerning the above-referenced Superfund site and the possible transportation of waste to that site from a "J. W. ARCO" service station located in or around Allentown, Pennsylvania.

Our records indicate that John B. Wotherspoon, Jr. operated an ARCO service station as a Lessee at the location of 6th and Walnut Streets, Allentown, Pennsylvania 18101 sometime prior to November 28, 1984. At that time, the Lease Agreement between Mr. Wotherspoon and ARCO ended. ~~The last known address for John B. Wotherspoon is 234 Turner Street, Allentown, Pennsylvania 18102.~~

As the Lessee/operator of this station, Mr. Wotherspoon acted as an independent contractor and under our standard Lessee Agreement would be responsible for proper disposal of the waste generated at this location.

We cannot state for certain that this service station is the generator of the waste that was allegedly delivered to the Novack Sanitary Landfill; it is the only J. W. ARCO service station in Allentown, Pennsylvania.

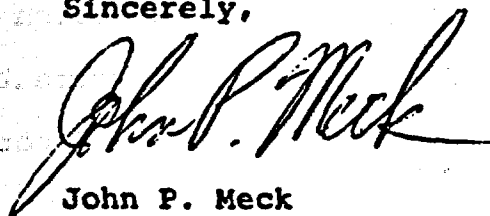
~~I have not attempted in this letter to additionally provide you with the information about the typical types of trash or waste removed from a service station. If you still wish to have such information, please contact me.~~

Mr. Michael Towle  
December 3, 1987  
Page 2

This should terminate ARCO's involvement in any CERCLA or RCRA action involving this landfill. If this is not the case, please so notify me.

Thank you for your assistance and cooperation in this matter.

Sincerely,



John P. Meck

JPM:sw

cc: J. A. Miller

AR300227

One Jefferson Square  
P.O. Box 50  
Boise, Idaho 83728  
208/384-7709

Brian J. King  
Associate General Counsel



Boise Cascade Corporation

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

NOV 19 1987

**EPA-Region III**

November 13, 1987

Mr. Michael Towle  
U.S. Environmental Protection Agency,  
Region III  
PA CERCLA Remedial Enforcement  
Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, PA 19107

Subject: Request for Information (3HW12) -- Novak Sanitary  
Landfill

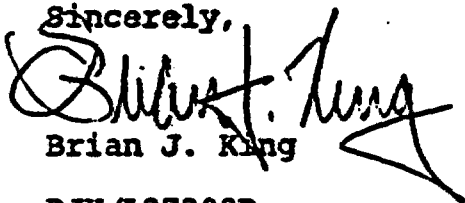
Dear Mr. Towle:

In response to your October 16 request for information, we have searched all information and documents under the control of Boise Cascade and have been unable to find any information relating to the Novak Sanitary Landfill or Valley Disposal, Inc.

~~On March 11, 1985, Boise Cascade sold its Allentown/Pennsylvania, envelope plant to M-W Envelope, Inc. All books and records relating to Boise Cascade's operation of the plant, were retained by M-W Envelope, Inc. Consequently, we were unable to review these records as part of our search.~~

Please let me know if you need any additional information.

Sincerely,



Brian J. King

BJK/L37308D

AR300228

# Bostrom

SEATING, INC.

3326 EAST LAYTON AVENUE / P.O. BOX 600 / CUDAHY, WISCONSIN 53110 / 414-744-2070

November 19, 1987

**RECEIVED**

CERCLA REMEDIAL ENFORCEMENT SECTION

NOV 24 1987

**EPA-Region III**

Mr. Michael Towle  
U.S. Environmental Protection Agency  
Region III, CERCLA Enforcement Section (3HW12)  
841 Chestnut Street, Sixth Floor  
Philadelphia, Pennsylvania 19107

RE: Novak Sanitary Landfill  
Lehigh County, Pennsylvania

Dear Mr. Towle:

This is in reply to the November 3, 1987, letter from Bruce P. Smith, Chief of the Hazardous Waste Enforcement Branch.

Bostrom Seating, inc. operates in Pennsylvania through its wholly owned subsidiary, Bostrom Distribution Center, Inc., 2201 Hangar Place, Allentown, Pennsylvania 18103. As such the reply is being made on behalf of Bostrom Distribution Center, Inc. Prior to January 29, 1985, Bostrom Distribution Center was a subsidiary of Universal Oil Products (U.O.P), Ten UOP Plaza, DesPlaines, Illinois 60016. Accordingly our response is limited to events which occurred after this date. We do have a limited amount of records in our possession from prior to January 29, 1985, for Bostrom Distribution Center, Inc., and have attempted to answer any inquiries which relate to the earlier period.

1. Bostrom Seating, Inc., is a manufacturer of vehicle seating for heavy duty trucking, construction and agricultural equipment applications. A warehouse is located in Allentown, Pennsylvania, which operates under the name of Bostrom Distribution Center, Inc. The warehouse operation commenced doing business in August, 1984. The only function of the Allentown operation is to warehouse and ship completed truck seats to Mack Trucks, Inc. located in Allentown, Pennsylvania. There are no manufacturing activities at Allentown, and at all times since August, 1984, the Company has employed one employee whose function was to place orders for completed truck seats on the Bostrom Seating, Inc. manufacturing facilities located in Cudahy, Wisconsin and Piedmont, Alabama, warehouse the seats, and deliver the seats to Mack Trucks, Inc.

AR300229

2. There were no hazardous substances disposed of during the time Bostrom Distribution Center, Inc. was owned by Bostrom Seating, Inc. The only waste disposed of consisted of cardboard cartons and various paper office forms.

We have no records of any payments to Valley Disposal, Inc. A search of all paid invoice files was conducted for the period beginning on January 29, 1985 to present. The only related items located were a letter from Hoch Sanitation Co., Inc (attached), stating they had acquired Valley as of June 1, 1985. The purchase order mentioned in the letter is attached. (P.O. Number 23335, dated July 17, 1985)

In addition, payment records of Bostrom Distribution Center, Inc. are stored at this site for the period from June 30, 1983, the date of incorporation. All paid invoice files were reviewed and no payments to Valley Disposal were located.

We do not have any records to indicate where Hoch Sanitation or Valley Disposal may have disposed of any waste, so we cannot state if any substances were sent to the Novak Sanitary Landfill.


3. To the best of the knowledge of Mr. Michael Kabacinski, our employee at Allentown, waste disposal service was started in August, 1984, and continued on a weekly basis until the present time. Again, we have no records to indicate where any waste was taken and have no record of any transactions other than paid invoices to Hoch Sanitation for periods after June 1, 1985.
4. Waste paper was placed in a covered dumpster type container and picked up by the waste haulers mentioned above.
5. Other than these persons mentioned in items 1-4, we have no knowledge or record of other persons who generated, treated, stored, transported or disposed of waste.
6. ~~We have no record of any correspondence with any regulatory agency regarding the above matters since the period after January 29, 1985. Inquiries prior to that period should be directed to Universal Oil Products, Inc. (U.O.P).~~
7. ~~We have no record of any correspondence with any third party regarding the above after January 29, 1985. Inquiries prior to that period should be directed to Universal Oil Products, Inc (U.O.P).~~
8. We have no record of any deeds, rights of way, leases or other interests in the Novak Sanitary Landfill.

AR300230



We have searched all contract, maintenance and service agreement files, and purchase order files and paid invoice files for the period since January 29, 1985, and in addition have searched paid invoice files for the period June 20, 1983 to January 29, 1985. The only items located in addition to these mentioned above were monthly billings from Hoch Sanitation Co., Inc. for the period February 1986 to the present.

Very truly yours,

  
Jerome L. Hegy  
Treasurer

JLH:mb  
encl.

AR300231

**DORR-OLIVER**   
**DORR-OLIVER INCORPORATED**

October 15, 1987

ONE CARLETON AVENUE  
HAZLETON, PENNSYLVANIA 18201  
TEL: 717-455-2051

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

OCT 17 1987

**EPA-Region III**

U.S. EPA Region III  
841 Chestnut Street  
Sixth Floor  
Philadelphia, Pennsylvania 19107

Attention: Mr. Michael Towle

Dear Mr. Towle:

Your letter of October 7, 1987, to John Skitka of Dorr-Oliver, has been forwarded to me for reply.

The business conducted at the Foglesville facility, prior to its closing in December of 1986, was under the auspices of the Standard Oil Company. This included the industrial hygiene, as well as the environmental areas of the business.

It is my recommendation that you submit your request for information to the Standard Oil Company in Cleveland, Ohio.

Very truly yours,



Joseph C. Pillus  
Supervisor of Industrial Hygiene and Safety

JCP:gak

CC: John Skitka

AR300232



FRANTZ MANUFACTURING CO., 301 W. THIRD STREET • STERLING, ILLINOIS 61081 • TELEPHONE 815-625-0163

PLEASE REPLY TO:  
FRANTZ EASTERN DIVISION  
LEHIGH VALLEY INDUSTRIAL PARK NO. 2  
ALLENTOWN, PENNSYLVANIA 18103  
TELEPHONE 610-264-0182

October 15, 1987

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

OCT 19 1987

**EPA-Region III**

Michael Towle  
U.S. Environmental Protection Agency, Region III  
PA. CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, Pennsylvania 19107

Dear Mr. Towle:

:IN REVIEWING YOUR RECENT LETTER CONCERNING VALLEY DISPOSAL INC.

I have been with Frantz Mfg. Co. since January 1987 and to my knowledge we have not used Valley Disposal Inc. to dispose of our waste materials. If Valley Disposal Inc. was used before I took over as manager, all the records were sent to our home office, which would be located at 301 West Third Street  
P.O. Box 497  
Sterling ILL 61081

The waste material that we dispose of consists only of cardboard and paper products. Any further questions, please contact our home office listed above.

Sincerely,

*Kenneth R. Eroh*  
Kenneth R. Eroh  
Frantz Mfg. Co.  
Warehouse Manager

KRE  
dis

AR300233

**E. R. CARPENTER COMPANY, INC.**  
OMALON DIVISION  
SNOWDRIFT RD.  
P.O. BOX 129  
FOGELSVILLE, PA 18051  
(215) 395-0311



October 13, 1987

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

OCT 15 1987

**EPA - Region III**

Mr. Michael Towle  
U.S.E.P.A., Region III  
PA. CERCLA Remedial  
Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, PA 19107

Dear Mr. Towle:

I am returning the letter you sent us because this facility is no longer owned by Olin Corporation. E. R. Carpenter Company, Inc., with headquarters in Richmond, Virginia, purchased this plant from Olin Corporation on December 16, 1985.

The address of Olin Corporation's corporate headquarters is 120 Long Ridge Road, P.O. Box 1355, Stamford, Connecticut 06904-1355.

Sincerely yours,

E. R. CARPENTER COMPANY, INC.

  
F. D. Pineda  
Plant Manager

FDP/blr

Enclosures

AR300234



Acoustical Spray Insulators, Inc. • Box 625 • Allentown, Pa. 18105 • (215) 767-9272

November 11, 1987

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

NOV 17 1987

**EPA-Region III**

Mr. Michael Towle  
U.S. Environmental Protection  
Agency, Region III  
PA. CERCLA Remedial Enforcement  
Section (3HW12)  
841 Chestnut St., 6th Floor  
Philadelphia, PA 19107

Ref: Novak Sanitary Landfill  
Lehigh County, PA

Dear Mr. Towle:

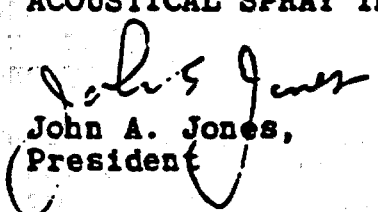
In response to a letter of November 3, 1987, from Bruce Smith, we hereby submit the following information concerning disposal of hazardous material by our firm at the above location:

1. Acoustical Spray Insulators is an insulation contractor. We are applicators of the sprayed urethane foam roof system, K-13 spray on interior insulation system and Cafco fireproofing system.
2. - 8. Upon checking all possible sources and records, we determined that we did not dispose of any hazardous material, of any form, at Novak Landfill.

If you have any questions, please do not hesitate to contact us.

Sincerely,

ACOUSTICAL SPRAY INSULATORS, INC.

  
John A. Jones,  
President

JAJ/ck

AR300235

Law Department  
Air Products and Chemicals Inc  
Box 538  
Allentown, PA 18105  
Telephone (215) 481-7351

**AIR**  
**PRODUCTS**

5 March 1987

AIRBORNE

Ms. Humane Zia  
U. S. Environmental Protection Agency, Region III  
CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Building, 6th Floor  
Philadelphia, PA 19107

Re: Novak Sanitary Landfill  
South Whitehall Township  
Lehigh County, PA

Dear Ms. Zia:

The following is the response of Air Products and Chemicals, Inc. ("Air Products") to the U.S. Environmental Protection Agency's request for information regarding the Novak Sanitary Landfill forwarded under cover of Bruce P. Smith's letter of 13 January 1987, which was received by Air Products on 20 January 1987. In light of the fact that the proposed listing of this site on the NPL has not been finalized, you agreed to allow Air Products an extension of time to respond to the request for information until and including 6 March 1987.

Air Products has undertaken an investigation and document search involving environmental, operating and administrative personnel. The search has been conducted under the supervision of the Law Department. We have reviewed central purchasing and invoicing records maintained since September 1968 at the Air Products corporate headquarters in Trexlertown, PA. Also, in accordance with your instructions, we have contacted plant personnel or searched for records related to any use of the Novak Sanitary Landfill by Air Products facilities located in Pennsylvania, New Jersey and Delaware (the tri-state area).

No document or information obtained in our investigation to date indicates that Air Products arranged for the transportation, storage or disposal of hazardous wastes (as defined under RCRA, 42 U.S.C. § 6901 et seq.) at the Novak Sanitary Landfill.

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MAR 06 1987

MAR 06 1987

AR300236

Region III

Ms. Humane Zia  
5 March 1987  
Page 2

However, Air Products records indicate that from 1 October 1968 through 30 September 1970, Air Products issued purchase orders to "Louis C. Novak", of "Novak Sanitation Services Inc." for the removal of "rubbish" from our Trexlertown Plant #3. No landfill destination is specified in these records.

Beginning in or around September 1970, certain Air Products Lehigh Valley facilities began to utilize "Reeser's Hauling Service" for refuse collection. These transactions were reported to EPA Region III by Air Products in connection with EPA's investigation of the Reeser's landfill. As previously reported, Air Products facilities continued to utilize Reeser's Hauling Service for refuse collection until approximately January 1983. Air Products' records show that on or around 5 January 1983, Novak Sanitary Landfill, Inc. purchased "Reeser's Automated Refuse Systems" as part of a settlement of an outstanding antitrust claim. Apparently, sometime thereafter Mr. Novak began to collect trash from the Air Products facilities previously serviced by Reeser's.

Air Products' records indicate that from approximately 21 February 1983 through 31 December 1984, Air Products issued purchase orders to Louis C. Novak or to "Valley Disposal, Division of Novak Landfill and Recycling, Inc." (the vendor name varies somewhat from document to document) for the regular removal of "trash and other refuse" from various Air Products Lehigh Valley locations. The purchase orders with Valley Disposal require that the trash be disposed of at a Pennsylvania DER approved and licensed facility, and further specifically notes that the vendor will dispose of the trash at the "Novak Sanitary Landfill, Inc., Permit No. 100534, located in South Whitehall, PA."

None of these documents indicate that any hazardous substances (as defined in CERCLA, 42 U.S.C. § 9601 et seq.) were transported to the Novak Sanitary Landfill, and with few exceptions, the contents of the shipments is referred to as "rubbish" for the 1968 to 1970 period and "trash and other refuse" for the 1983 to 1984 period.

Based upon this investigation, Air Products does not believe that it is a responsible party at this site. ~~The documents uncovered in this investigation indicate that Mr. Novak's company collected rubbish, trash and other refuse from various Air Products facilities. Any hazardous substances which may have been contained in these shipments, likely were de minimis.~~ The documents located in this investigation are available for your review at the Air Products corporate headquarters in Trexlertown, Pennsylvania.

AR300237

Ms. Humane Zia  
5 March 1987  
Page 3

Finally, Air Products has no documents pertaining to the use of the Novak Sanitary Landfill for the disposal of hazardous substances by other persons.

Please contact me with any comments or questions. My direct telephone number is (215) 481-7352.

Very truly yours,



Stephen S. Ferrara

SSF:sjb  
0188K

AR300238.



Law Department  
Air Products and Chemicals, Inc  
Box 538  
Allentown, PA 18105  
Telephone (215) 481-7351

**AIR**  
**PRODUCTS** 

2 April 1987

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

APR 06 1987

Ms. Humane Zia  
U. S. Environmental Protection Agency, Region III  
CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Building, 6th Floor  
Philadelphia, PA 19107

**EPA-Region III**

Re: Novak Sanitary Landfill  
South Whitehall Township  
Lehigh County, PA

Dear Ms. Zia:

Thank you for your telephone call of 9 March 1987. In response to your request for additional information and documents concerning the trash disposal activities of Air Products and Chemicals, Inc. ("Air Products"), I have enclosed the following:

- 1) Purchase Order No. MD-50299 dated 27 September 1968 issued to Louis C. Novak for "rubbish removal" from 1 October 1968 through 30 September 1969 (See Exhibit "A");
- 2) Purchase Order No. MK-64999 dated 30 September 1969 issued to Louis C. Novak for "rubbish removal" from 1 October 1969 through 30 September 1970 (See Exhibit "B");
- 3) Purchase Order No. XE-54577 dated 7 January 1981 issued to Reeser's Automated Refuse Systems (Attn: Ed Reeser) for "removal of trash and other refuse" for the period from 1 January 1981 through 31 December 1982 (Note: this blanket purchase order was extended by various change orders to extend service, and eventually this order was assumed by Valley Disposal) (See Exhibit "C");
- 4) Change Order No. 16 to Purchase Order No. XE-54577 dated 21 February 1983 issued to Reeser's Automated Refuse Systems (Attn: Lou Novak) noting that Reeser's Automated Refuse Systems had been acquired by Valley Disposal, Div. of Novak Landfill Corp. and that trash would be disposed of at the Novak Sanitary Landfill (See Exhibit "D");
- 5) Purchase Order No. XE-8254A dated 5 April 1983 issued to Valley Disposal, Div. of Novak Landfill & Recycl., Inc. for "removal of trash and other refuse" effective 1 May 1983 (Note: This blanket purchase order was periodically extended.) (See Exhibit "E");

AR300239

Ms. Humane Zia  
2 April 1987  
Page 2

6) Change Order No. 14 to Purchase Order No. XE-8254A dated 26 December 1984 issued to Valley Disposal, Div. of Novak Landfill & Recycl., Inc. cancelling this order effective 21 December 1984 (See Exhibit "F");

7) Monthly invoices from Novak Sanitation Services Inc. for "Refuse Removal" from July, 1969 through April, 1970. Apparently, monthly invoices for the period from October, 1968 through June, 1969 were not retained (See Exhibit "G");

8) Monthly invoices from Valley Disposal, Div. of Novak Landfill Corp. for "Refuse Removal" from January, 1983 through December, 1984 (the July, 1984 invoice has not been located) (See Exhibit "H");

9) Letters dated 6 May 1985 and 28 June 1985 to Joseph J. C. Donovan, Esquire of Region III's CERCLA Enforcement Section providing the response of Air Products to EPA's information request for the Heleva Landfill in North Whitehall Township. The records referenced in these letters evidence that during 1968 and 1969, the Air Products Plant #3 used Continental Sanitary Services for the removal of certain substances (principally liquid wastes) while continuing to use Valley Disposal for refuse removal (See Exhibit "I").

The attached records indicate that Air Products utilized Mr. Novak's hauling services only for the removal of non-hazardous wastes. In 1968 and 1969, the records indicate that the Trexlertown Plant #3 utilized two different hauling services. Continental Sanitary Services was used for liquid wastes, certain of which, if not mixed or diluted when shipped, might exceed RCRA standards. ~~Novak Sanitation Services was used for rubbish removal.~~ In 1983 and 1984, Air Products utilized Valley Disposal for trash and refuse removal from various Lehigh Valley locations. During this period, Air Products enforced corporate policies and practices that required the identification and separate disposal of hazardous wastes, consistent with RCRA and any more stringent state or local requirements.

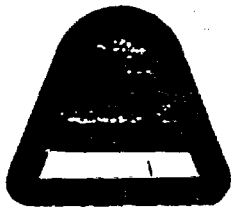
Air Products continues to believe that it is not a responsible party at this site. Of course, should you require additional information to assist you in your investigation, please contact me.

Very truly yours,

  
Stephen S. Ferrara

SSF:sjb  
0364K  
ENCLOSURES

AR300240



**ALLENTOWN PAINT MANUFACTURING COMPANY, INC.**

Graham and East Allen Streets, P.O. Box 597

Allentown, Pennsylvania 18105-0597

(215) 433-4273

October 19, 1987

Mr. Michael Towle  
U.S. Environmental Protection Agency, Region III  
PA. CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, PA 19107

REFERENCE: 3HW12

Dear Mr. Towle:

In response to your letter of October 7, 1987 regarding possible waste disposal of our waste materials via Valley Disposal Inc. at the Novak Sanitary Landfill, as we informed you by telephone on October 13th, we never dealt with a company by the name of "Valley Disposal Inc." as far as we know based on our records which we keep for a period of seven(7) years.

The Allentown Paint Company is a paint coatings manufacturer.

We have no records who and where our trash was disposed of prior to November 1979. Our trash is stored in "20 yard containers" and consists of dry materials, i.e. empty paint cans, empty paper bags and broken wooden pallets.


From November 1979 (which is as far back as our records are kept) we had a monthly or bi-monthly pick up by SCA Services of Pennsylvania, Inc. thru March 1984. From April 1984 thru May 1985 trash was picked up monthly or bi-monthly by Valley Recycling. From July 1985 to the present our trash is picked up by Hoch Sanitation. Enclosed are copies of invoices which are examples from the above mentioned companies.

We are also enclosing copies of example hazardous waste manifests for paint sludge which includes hazardous waste liquid-latex sludge and flammable liquid waste - solvent sludge.

I hope this information is of help to you.

Sincerely,

ALLENTOWN PAINT MFG. CO., INC.

  
Martin H. Ritter  
President

MHR/ag

Enclosures

AR300241



**ALLENTOWN STEEL FABRICATING CO. INC.**

200 RACE STREET • CATASAUQUA, PENNSYLVANIA 18032

Tel. 264-2815

October 14, 1987

**RECEIVED**

CERCLA REMEDIAL ENFORCEMENT SECTION

OCT 16 1987

**EPA-Region III**

Michael Towle  
U. S. Environmental Protection Agency, Region III  
PA. CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, Pennsylvania 19107

RE: 3HW12

Gentlemen:

With reference to the above regarding Novak Sanitary Landfill, we wish to report the following:

We are a steel fabricating shop that provides a service of custom made short run fabricated metal products.

The types of hazardous substances sent to the Novak Sanitary Landfill included ~~welding rod cartons, wood cratings, and empty paint cans (MSDS enclosed to provide element identification) and paper generated in the office.~~

We had contracted with Novak at the time the Borough of Catassauqua refused to take commercial garbage until they were closed and we then retained Hoch.

The state of the substances were solid. Paint cans are open topped but dry inside.

If there is any more information you require, please let us know.

Sincerely,

ALLENTOWN STEEL FABRICATING CO., IN.

*John D. Svoboda*  
John D. Svoboda,  
Vice-President and General Manager

JDS:ces

AR300242



# INDUCOTE

CHEMICAL COATINGS DIVISION

WASHINGTON ST., CONSHOHOCKEN, PA. 19029  
TELEPHONE AREA CODE (3-213) 825-1903

DEVELOPED FOR: \_\_\_\_\_ date: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

ATTENTION: \_\_\_\_\_ copies to: \_\_\_\_\_

PRODUCT: Basic Lead Silico Chromate Primer CODE NO.: 8402

TYPE APPLICATION: Brush or Spray

CONSTANTS	APPLICATION RECOMMENDATIONS
Wt./Gal. <u>13.52 ± 0.1 Lbs.</u>	Reducer <u>Xylo1. Mineral Spirits. Naph</u>
Viscosity <u>80 ± 5 KU @ 77° F.</u>	Recommended Coating Viscosity <u>As desired</u>
Solids by Wt. <u>80.0 ± 0.5%</u>	Baking or Drying Schedule <u>Air dry - 2 hours</u>
Solids by Vol. <u>60.6 ± 0.5%</u>	<u>dry touch; overnight recoat</u>

### PROPERTIES OF COATING

Hardness \_\_\_\_\_ Gloss Flat

Flexibility \_\_\_\_\_ Color Red

Special \_\_\_\_\_ Exposure: Interior  Exterior

Remarks: Theoretical Coverage @ 1 mil dry film = 979 sq. ft./gal.

NOTE: This material will not cause cracking of top coats.

Provides 6 months to one year of protection to steel prior to field painting or enclosure.

Basic Lead Silico Chromate Primer is compatible with conventional fireproofing.

Finnema & Haley, Inc. disclaims responsibility for results of use of this information, which is furnished without charge, or of any product, method, or apparatus mentioned herein. It is the user's responsibility to make and be guided by his own tests in determining suitability of any such product, method, or apparatus for his purpose. No statement or suggestion herein is to be considered a recommendation or inducement of any use, manufacturer or sale that may infringe any patent now or hereafter in existence.

AR300243

CHEMICAL COATINGS DIVISION

WASHINGTON ST., CONSHOHOCKER, PA. 19428  
TELEPHONE AREA CODE (1-215) 825-1963

DEVELOPED FOR: \_\_\_\_\_ date: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

ATTENTION: \_\_\_\_\_ copies to: \_\_\_\_\_

PRODUCT: Gray Oxide Primer CODE NO.: 8403

TYPE APPLICATION: Brush or Spray

CONSTANTS	APPLICATION RECOMMENDATIONS
Wt./Gal. <u>10.49 ± 0.1 Lbs.</u>	Reducer <u>Naphtha, Xylol, Mineral Spirit</u>
Viscosity <u>70 ± 5 KU at 77° F.</u>	Recommended Coating Viscosity <u>As desired</u>
Solids by Wt. <u>57.69 ± 0.1</u>	Baking or Drying Schedule <u>Air dry - 30 minutes</u>
Solids by Vol. <u>34.91 ± 0.1</u>	<u>dry touch; overnight recoat</u>

PROPERTIES OF COATING

Hardness N/A Gloss Low

Flexibility N/A Color Neutral Gray

Special Extreme Exterior Durability Exposure: Interior  Exterior

Remarks: Coverage @ 1 mil dry film = 560 sq. ft./gal.

NOTE: This material will not cause cracking of top coats.

Provides 6 months to 1 year of protection to steel prior to field painting or enclosure.

This primer is compatible with conventional fireproofing.

*Fineman & Haley, Inc. disclaims responsibility for results of use of this information, which is furnished without charge, or of any product, method, or apparatus mentioned herein. It is the user's responsibility to make and be guided by his own tests in determining suitability of any such product, method, or apparatus for his purpose. No statement or suggestion herein is to be considered a recommendation or inducement of any use, manufacture or sale that may infringe any patents now or hereafter in existence.*

CHEMICAL COATINGS DIVISION

WASHINGTON ST., CONSHOHOCKEN, PA. 19428  
TELEPHONE AREA CODE (1-215) 825-1903

DEVELOPED FOR: \_\_\_\_\_ date: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

ATTENTION: \_\_\_\_\_ copies to: \_\_\_\_\_

PRODUCT: Basic Lead Silico Chromate Primer CODE NO.: 8402

TYPE APPLICATION: Brush or Spray

CONSTANTS	APPLICATION RECOMMENDATIONS
Wt./Gal. <u>13.52 ± 0.1 Lbs.</u>	Reducer <u>Xylo1, Mineral Spirits, Naphtha</u>
Viscosity <u>80 ± 5 KU @ 77° F.</u>	Recommended Coating Viscosity <u>As desired</u>
Solids by Wt. <u>80.0 ± 0.5%</u>	Baking or Drying Schedule <u>Air dry - 2 hours</u>
Solids by Vol. <u>60.6 ± 0.5%</u>	<u>dry touch; overnight recoat</u>

PROPERTIES OF COATING

Hardness \_\_\_\_\_ Gloss Flat

Flexibility \_\_\_\_\_ Color Red

Special \_\_\_\_\_ Exposure: Interior  Exterior

Remarks: Theoretical Coverage @ 1 mil dry film = 973 sq. ft./gal.

NOTE: This material will not cause cracking of top coats.

Provides 6 months to one year of protection to steel prior to field painting or enclosure.

Basic Lead Silico Chromate Primer is compatible with conventional fireproofing.

*Finchem & Kely, Inc. disclaims responsibility for results of use of this information, which is furnished without charge, or of any product, method, or apparatus mentioned herein. It is the user's responsibility to make and be guided by his own tests in determining suitability of any such product, method, or apparatus for his purpose. No statement or suggestion herein is to be considered a recommendation or endorsement of any test, manufacture or sale that may involve any patent now or hereafter in existence.*

CHEMICAL COATINGS DIVISION

WASHINGTON ST., CONSHOHOCKEN, PA. 19028  
TELEPHONE AREA CODE (1-215) 879-1900

DEVELOPED FOR: \_\_\_\_\_ date: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

ATTENTION: \_\_\_\_\_ copies to: \_\_\_\_\_

PRODUCT: Gray Oxide Primer CODE NO.: 8403

TYPE APPLICATION: Brush or Spray

CONSTANTS

Wt./Gal. 10.49 ± 0.1 Lbs.  
Viscosity 70 ± 5 KU at 77° F.  
Solids by Wt. 57.69 ± 0.1  
Solids by Vol. 34.91 ± 0.1

APPLICATION RECOMMENDATIONS

Reducer Naphtha, Xylol, Mineral Spirits  
Recommended Coating Viscosity As desired  
Baking or Drying Schedule Air dry - 30 minutes  
dry touch; overnight recoat

PROPERTIES OF COATING

Hardness N/A Gloss Low  
Flexibility N/A Color Neutral Gray  
Special Extreme Exterior Durability Exposure: Interior  Exterior

Remarks: Coverage @ 1 mil dry film = 560 sq. ft./gal.

NOTE: This material will not cause cracking of top coats.

Provides 6 months to 1 year of protection to steel prior to field painting or enclosure.

This primer is compatible with conventional fireproofing.

Fluorocryl & Kaley, Inc. declines responsibility for results of use of this information, which is furnished without charge, or of any product, method, or apparatus mentioned herein. It is the user's responsibility to make and be guided by his own tests in determining suitability of any such product, method, or apparatus for his purpose. No statement or suggestion herein is to be considered a recommendation or endorsement of any size, manufacturer or sale that may bring up any patent now or hereafter in existence.

AR300246



CHEMICAL COATINGS DIVISION

WASHINGTON ST., CONSHOHOCKEN, PA. 19428  
TELEPHONE AREA CODE (1-215) 825-1900

DEVELOPED FOR: \_\_\_\_\_ date: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

ATTENTION: \_\_\_\_\_ copies to: \_\_\_\_\_

PRODUCT: Red Oxide Primer CODE NO.: B404

TYPE APPLICATION: Brush, Roll or Spray

CONSTANTS	APPLICATION RECOMMENDATIONS
Wt./Gal. <u>10.94 ± .01</u>	Reducer <u>Naphtha/Mineral Spirits/To</u>
Viscosity <u>60 KU ± 5</u>	Recommended <u>Customer determinat</u>
Solids by Wt. <u>60.34 ± 1</u>	Coating Viscosity _____
Solids by Vol. <u>35.54 ± 0.5</u>	Baking or <u>Air dry 20 minutes a</u>
	Drying Schedule _____
	<u>70° F.</u>

PROPERTIES OF COATING

Hardness Good Gloss Flat  
Flexibility Good Color Red  
Special Low V.O.C. 3.6 Exposure: Interior  Exterior

Remarks: Coverage 1 mil dry film = 584 Sq. Ft./Gal.

Flash point 44° F.

This material will resist rust for six months in the field after erection. This material is compatible with conventional fireproofing.

*Finarco & Halsey, Inc. disclaims responsibility for results of use of this information, which is furnished without charge, or of any product, method, or apparatus mentioned herein. It is the user's responsibility to make and be guided by his own tests in determining suitability of any such product, method, or apparatus for his purpose. No statement or suggestion herein is to be considered a recommendation or inducement of any use, manufacture or sale that may infringe any patent now or hereafter in effect.*

AR300247



**CHEMLAWN®**

November 6, 1987

**RECEIVED**

CERCLA REMEDIAL ENFORCEMENT SECTION

NOV 13 1987

**EPA-Region III**

Michael Towle  
U. S. Environmental Protection Agency, Region III  
PA. CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street - 6th Floor  
Philadelphia, PA 19107

Re: Information concerning Valley Disposal Inc. and/or  
Novak Sanitary Landfill

Dear Mr. Towle:

This letter responds to your information request regarding ChemLawn Services Corporation's operations at its branch located at 764 Roble Road, Allentown, Pennsylvania. ChemLawn Services Corporation does not, as a matter of course, dispose of materials presently defined as hazardous substances by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) or hazardous waste under the Resource Conservation and Recovery Act (RCRA).

Responses to your specific questions are as follows:

1. ChemLawn Services Corporation is in the business of providing professional lawn care and maintenance service to both commercial and residential customers. Our specialists apply dilute fertilizer and pesticide solutions at specified application rates. A fleet of trucks is maintained at each branch for that purpose.
2. Discussions with current branch personnel indicate that no hazardous substances, as defined by CERCLA or RCRA are generated at this branch, or were any shipped to the Novak Sanitary Landfill.
3. Not applicable. See response to question 2.
4. Not applicable. See response to question 2.
5. Not applicable. See response to question 2.
6. Not applicable. See response to question 2.
7. Not applicable. See response to question 2.
8. ChemLawn Services Corporation has no deeds, rights-of-way, leases or other real interests in or with the Novak Sanitary Landfill.

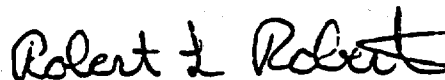
Michael Towle  
U.S.E.P.A.  
November 6, 1987  
Page 2

The ChemLawn Services Corporation is willing to supply you with any information in our possession, but we are not aware of any materials handled by Valley Disposal which were hazardous in nature. It is ChemLawn's position that all materials which are or were transported from the Allentown branch are non-hazardous and constitute typical office and maintenance refuse.

If the USEPA has any information indicating that the ChemLawn branch located in Allentown, Pennsylvania, did indeed generate, transport, or dispose of any hazardous materials in the Novak Landfill, please send me copies of that information. This information, if available, should include not only dates and quantities, but also some description of the hazardous nature of the materials involved.

Sincerely,

CHEMLAWN SERVICES CORPORATION



Robert L. Roberts, Jr.  
Environmental Counsel

jhm

cc: Dean Tkacik, Assistant Branch Manager,  
Allentown 4531

AR300249

**CONRAIL**



February 11, 1988

Mr. Michael Towle  
United States Environmental  
Protection Agency  
Region III  
PA. CERCLA Remedial Section  
841 Chestnut Street  
6th Floor  
Philadelphia, Penna. 19107

RE: Novak Sanitary Landfill  
South Whitehall Township,  
Lehigh County, Pennsylvania

Dear Mr. Towle:

I have enclosed, as per our telephone conversations, all documents in the possession of the Consolidated Rail Corporation ("Conrail") relating to Valley Disposal, Inc. As I told you, ~~Conrail's contract with Valley Disposal was for the disposal of municipal waste or trash and not for the disposal of hazardous substances;~~ Valley Disposal regularly removed refuse from Conrail facilities in Allentown, Pennsylvania and Bethlehem, Pennsylvania solely acting in the capacity of a refuse removal contractor. Please be aware that by responding to this Section 104(e) request for information, relating to the above-referenced site, Conrail makes no admission of any liability or waiver of any defense under CERCLA, as amended by the Superfund Amendments and Reorganization Act of 1980 ("SARA"), or any other law, regulation, order, or under common law.

After a complete review of the enclosed documents which consist primarily of invoices, purchase orders and statements, I am sure that the Environmental Protection Agency ("EPA") will agree that Conrail is not responsible in any way for the condition of the Novak Sanitary Landfill. Of course, Conrail's search of its records is continuing and we reserve the right to supplement our responses if additional documentation becomes available.

Additionally, by this letter, Conrail makes a formal request pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §552(a)(3) for any information that the EPA has in

February 11, 1988  
Page 2

its possession which relates to the above-referenced site and which makes any reference to Conrail or purports to link Conrail in any way to the Novak Sanitary Landfill. Your prompt attention to this request within the ten-day period prescribed by the FOIA would be greatly appreciated. I look forward to hearing from you.

If I can be of any further assistance in this matter or if, as we discussed, the EPA desires additional information from Conrail, please do not hesitate to contact me.

Very truly yours,

*Teri R. Simon*

TERI R. SIMON  
Attorney  
1138 Six Penn Center Plaza  
Philadelphia, Penna. 19103  
(215) 977-5004

TRS:ld

Enclosures

AR300251



October 23, 1987

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

OCT 26 1987

**EPA-Region III**

Mr. Michael Towle  
U.S. Environmental Protection Agency Region III  
PA CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, PA 19107

Dear Sir:

Pursuant to your letter of October 7, 1987 to our Mr. Joe Assal regarding the Novak Sanitary Landfill, we have reviewed our available records and have the following response.

1. Our business in Bethlehem is the blending and tinting of polyester gel coats.
2. ~~Based on our plant operations and practices, hazardous substances would not have been sent to the Novak Sanitary Landfill.~~
3. This question is not applicable since hazardous substances were not sent to the Novak Sanitary Landfill.
4. Only solid non hazardous office and factory trash was handled by Valley Disposal and later by Hoch Sanitation.
5. Non applicable since hazardous substances were not sent from our facility.
6. There was not any correspondence between our company and any regulatory agencies regarding hazardous substances in reference to Valley Disposal or the Novak Landfill.
7. There was not any correspondence between our company and any third party regarding hazardous substance in reference to Valley Disposal or the Novak Landfill.
8. There were no deeds, right of way, leases, or other real interests relating our company to the Novak Sanitary Landfill.

**COOK PAINT AND VARNISH COMPANY**  
POST OFFICE BOX 389 - KANSAS CITY, MISSOURI 64101  
TELEX 4-2564 COOKPAINT MKSC Phone 816/391-0000

SY/F23/1/9

88300252



ENGINEERING & MFG. CO.



Corrosion Specialists  
905-9061 (Area Code 215)

750 BROAD STREET, PO BOX 509 • EMMANUS, PENNSYLVANIA 18049-0399

January 27, 1987

U.S. Environmental Protection Agency, Region III  
CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Building, 6th Floor  
Philadelphia, PA 19107

Attn: Ms. Humane Zia

RE: 3HW12 - Novak Sanitary Landfill

Dear Ms. Zia:

In reply to 3HW12, we here at ELECTRO CHEMICAL do not generate hazardous waste. We do not produce or sell chemicals. We protect against chemicals. Our form of business is corrosion control.

~~We do have and use a small quantity of solvents, such as Toluene, Xylene, MEK, Ethyl Alcohol, DIBK, and Triclene. These are used to produce acid proof paints and adhesives.~~

We did not at any time send any hazardous substances to the Novak Sanitary Landfill.

Very truly yours,

ELECTRO CHEMICAL ENGINEERING & MFG. CO.

Jack Weaknecht  
Vice President Operations

With encl. - General bulletin which describes the nature of our business.

JW:skr

RECEIVED  
CERCLA REMEDIAL ENFORCEMENT SECTION

JAN 29 1987

EPA-Region III by

AR300253

# LEHIGH STRUCTURAL STEEL COMPANY

FOUNDED: 1919



1 ALLEN STREET, P. O. BOX 626  
TELEPHONE: 213-434-3221

ALLENTOWN • PA • 18105

October 26, 1987

**RECEIVED**

CERCLA REMEDIAL ENFORCEMENT SECTION

OCT 28 1987

**EPA-Region III**

CERTIFIED - RETURN RECEIPT REQUESTED

United States Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107

Attention: Mr. Michael Towle

Re: Your Reference 3HW12

Gentlemen:

We are in receipt of your letter of October 7, 1987 to our Mr. R. L. Mullen, President, regarding the Novak Sanitary Landfill located in Lehigh County, PA.

We have reviewed our current and stored files and find no records that would indicate that we had Valley Disposal Inc. transport and dispose of any waste materials. Since you are unable to indicate a time frame for your information, we have no way of positively identifying the status of records or of recollections of long time employees.

We are structural steel fabricators. We know of no hazardous waste that could have been consigned to Valley Disposal and subsequently found its way to the Novak Landfill. In the 1970 period, we disposed of waste pickle liquor from our galvanizing operation. We can state that this waste was not consigned to Valley Disposal. We have no other information on your questions contained in your above-referenced letter. To our knowledge, we had no direct dealings with Novak Landfill or Valley Disposal.

We have no other source of identification regarding these alleged transactions.

Very truly yours,

R. W. Marshall  
Vice President - Engineering

RWM/md

AR300254





Phone 395-6251

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 248

Allentown, Pa. 18104

Nov. 21 19 84

E. Schneider & Sons  
7th & Summer Avenue  
P.O. Box 942

Allentown, PA 18105

Refuse Removal Month of July

1 pickup @ \$150.00/pickup

Amt. \$150.00

*High  
Structural  
Steel*

OUR NEW ADDRESS

VALLEY DISPOSAL  
DIV. OF NOVAK LANDFILL CORP.  
RD. 1 BOX 248  
ALLEN TOWN, PA 18104



AR300255

Phone 395-8251

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 246

Allentown, Pa. 18104

Nov. 21 19 84

E. Schneider & Sons

7th & Summer Avenue

P. O. Box 942

Allentown, PA 18105

Refuse Removal Month of June

6 pickups @ \$150.00/pickup

Amt. \$900.00

*High  
Structural  
Spec*

AR300256

Phone 395-8251

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 246

Allentown, Pa. 18104

11/30

.....Nov. 21 19 84.....

E. Schneider & Sons  
7th & Sumner Avenue  
P.O. Box 942

Allentown, PA 18105

Refuse Removal Month of May

2 pickups @ \$150.00/pickup

Amt. \$300.00

*Lehigh  
Structural  
Steel*



AR300257

Phone 395-8251

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 268A

Allentown, Pa. 18104

April 30 19 85

E. Schneider & Sons  
7th & Sumner Ave.  
P.O. Box 942

Allentown, PA 18105

Lehigh Structural Steel

Refuse Removal Month of April

0 loads =

Amt.

\$0.00

AR300258

Phone 395-8251

4/2

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 268A

Allentown, Pa. 18104

.....3/31..... 19 85.....

E. Schneider & Sons

7th & Sumner Ave.

P.O. Box 942

Allentown, PA.....18105.....

**Lehigh Structural Steel**

Refuse Removal Month of March

1 Load @ \$300.00/Load =

Amt.

\$300.00

*E*

*POI*

AR300259

Phone 395-6251

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 268A

Allentown, Pa. 18104

May 31, 19 85

E. Schneider & Sons

7th & Sumner Avenue

P. O. Box 942

Allentown, PA 18105

## LEHIGH STRUCTURAL STEEL

Refuse Removal Month of May

1-30 yd. load @ \$300.00/load =  
Amt. \$300.00

AR300260

# VALLEY DISPOSAL

2/1

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 248

Allentown, Pa. 18104

Dec. 31 1984

E. Schneider & Sons

7th & Sumner Ave. P.O. Box 942

Allentown, PA 18105

## Lehigh Structural Steel

Refuse Removal Month of December

1-30yd. load @ \$150.00/load

	Amt.
	\$150.00
Past Due May	\$300.00
Past Due June	\$900.00
Past Due July	\$150.00
Past Due Sept.	\$150.00
Past Due Oct.	\$150.00
Past Due Nov.	\$150.00

Total Due \$1950.00

E  
P18

AR300261

Phone 395-8251

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

Allentown, Pa. 18104

RD.1 BOX 248

12/28

November 19 84

E. Schneider & Sons

7th & Sumner Ave., P.O. Box 942

Allentown; PA 18105

Lehigh Structural Steel

Refuse Removal Month of November

1-20yd. load @ \$150.00/load =

Amt. \$150.00

u  
P41

OUR NEW ADDRESS

VALLEY DISPOSAL  
DIV. NOVAK LANDFILL CORP.  
R.D. #1, BOX 268A  
ALLENTOWN, PA 18104

AR300262



Phone 395-6251

# VALLEY DISPOSAL

Div. of Novak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 248

Allentown, Pa. 18104

12-14  
7430  
Billed?

.....October.....19 84.....

E. Schneider & Sons.....

P. O. Box 942

7th & Sumner Ave.....

Allentown, PA 18105.....

---

---

Lehigh Structural Steel

Refuse Removal Month of October

1 load @ \$150.00/load = \$150.00

Amt. \$150.00

E  
P37

OUR NEW ADDRESS

VALLEY DISPOSAL  
DIV. NOVAK LANDFILL CORP.  
R.D. #1, BOX 268A  
ALLENTOWN, PA. 18104



AR300263

Phone 385-8251

# VALLEY DISPOSAL

Div. of Navak Landfill Corp.  
MODERN SANITATION EXPERTS

RD.1 BOX 246

Allentown, Pa. 18104

..... Feb 28 19 85 .....

E. Schneider & Sons

7th & Sumner Ave.

P.O. Box 942

Allentown, PA 18105

---

---

Lehigh Structural Steel

Refuse Removal Month of February

1 load @ \$300.00 load

Amt. \$300.00

OUR NEW ADDRESS

AR300264

POLYCO DYEING & FINISHING CORP  
801 NORTH MEADOW ST.  
ALLENTOWN, PA. 18001

**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

NOV 17 1987

**EPA-Region III**

MR MICHAEL TOWLE  
UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY REGION 111  
PA. CERCLA REMEDIAL ENFORCEMENT SECTION ( 3HW12 )  
841 CHESTNUT STREET, 6th FLOOR  
PHILADELPHIA, PENNSYLVANIA 19107

RE: NOVAK SANITARY LANDFILL ( 3HW12 )  
LEHIGH COUNTY, PA.

DEAR MR. TOWLE,

IN RESPONSE TO YOUR LETTER DATED NOV. 3rd 1987 I PROVIDE THE  
FOLLOWING INFORMATION.

1. THE NATURE OF OUR BUSINESS IS COMMISSION DYEING & FINISHING  
FABRICS FOR THE APPAREL TRADE.
2. TO MY KNOWLEDGE NO HAZARDOUS SUBSTANCES WERE SENT TO THE NOVAK ;  
LANDFILL FROM POLYCO.
3. N/A
4. N/A
5. N/A
6. N/A
7. N/A
8. N/A

THE NATURE OF DYEING AND FINISHING REQUIRES USING DYES AND CHEMICALS,  
HOWEVER THE DYE WASTE WATER IS PUT INTO THE MUNICIPAL SEWAGE SYSTEM  
NOT IN THE TRASH CONTAINER.

POLYCO HAS LEASED THE DYEING FACILITY FROM ~~LEHIGH DYEING~~ IN FEB 1984.  
AT THAT TIME LEHIGH HAD VALLEY DISPOSAL COLLECTING THE TRASH. POLYCO  
CONTINUED TO USE VALLEY DISPOSAL UNTIL APRIL 1984. AT THAT TIME HOCH  
SANATATION CO. TOOK OVER THE ACCOUNT. I AM ENCLOSING COPIES OF INVOICES  
FROM VALLEY DISPOSAL AND NOVAK. THESE INVOICES ARE FOR A COMPACTOR  
CONTAINER WHICH WAS REPLACED EVERY 4 TO 6 WEEKS. I HOPE THIS LETTER  
HAS BEEN SOME HELP.

AR300265

SINCERELY,

*Samuel Stung*



**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

OCT 19 1987

**EPA-Region III**

October 16, 1987

Michael Towle  
U. S. Environmental Protection Agency, Region III  
PA. CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 5th Floor  
Philadelphia, PA 19107

Dear Mr. Towle:

In reference to our telephone conversation, I would like to confirm that you have agreed to extend the due date for material requested in your letter of October 7, 1987 (#3HW12) from October 17, 1987 to November 2, 1987.

This extension should allow sufficient time to accumulate the requested material.

Sincerely,

R. E. Morgan, CM  
Manager, Facilities Management Dept

REM/brg

cc: A. Rodale  
B. Teufel  
G. Pave  
P. McGinley

AR300266

*Gross*

**GROSS, MCGINLEY, LABARRE & EATON**

ATTORNEYS AT LAW

33 SOUTH SEVENTH STREET

P O. BOX 1398

ALLENTOWN, PENNSYLVANIA 18105

(215) 820-5450

TELEFAX (215) 820-6006

November 2, 1987

MALCOLM J. GROSS  
PAUL A. MCGINLEY  
DONALD LABARRE, JR.  
J. JACKSON EATON, III  
MICHAEL A. HENRY  
PATRICK J. REILLY  
DONNA M. STESLOW

MORRIS EFRON  
0983-1987

**RECEIVED**  
DECELA REMEDIAL ENFORCEMENT SECTION

NOV 24 1987

**EPA-Region III**

Bruce P. Smith, Chief  
Hazardous Waste Enforcement  
United States Environmental  
Protection Agency  
841 Chestnut Building  
Philadelphia, PA 19107

Re: Environmental Protection Agency v. Novak Sanitary Landfill

Gentlemen:

At the request of our client, we are providing you with information relative to the work performed by Valley Disposal on behalf of Rodale Press, Inc. I am advised that to the best of my client's knowledge, there are no hazardous wastes included in this material.

Rodale Press, Inc. is a publisher of magazines. No printing is done on the premises of Rodale Press, however. All printing is subcontracted to independent printers throughout the United States.

Rodale Press, Inc. has had no correspondence of the type to which you refer in your recent letter. Further, Rodale Press, Inc. has no interest in the Novak Sanitary Landfill.

If you need anything further, feel free to contact me.

Very truly yours,

*dl*  
PAUL A. MCGINLEY

PAMc:dah  
Enclosure

cc: Gary Pave

**RECEIVED**

NOV 16 1987

Hazardous Waste Management Branch

AR300267



COOPER INDUSTRIES

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

December 10, 1987

Mr. Michael Towle  
U. S. Environmental Protection Agency, Region III  
PA CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, Pennsylvania 19107

RE: Novak Sanitary Landfill

Dear Mr. Towle:

This is the response of Wagner Division (Wagner), an unincorporated division of Edison International, Inc. to the CERCLA § 104(e) information request directed to Wagner-Cooper Industries (sic) regarding Novak Sanitary Landfill located along Orefield Road in South Whitehall Township, Lehigh County, Pennsylvania. Edison International, Inc. is a wholly owned subsidiary of Cooper Industries, Inc.

As a result of search efforts Wagner has located no documents, records, etc. which indicate that any hazardous substances were transported to Novak Sanitary Landfill.

Wagner manufactures brake and lighting products which are sold primarily to the automotive industry.

~~Documents regarding transactions between Cooper and Hoch Sanitation Company or Valley Disposal maintained by Wagner are presently at the Wagner facility located at Second and Jefferson Streets, Boyertown, Pennsylvania 19512.~~ The documents in Wagner's possession are correspondence, invoices, trip tickets, and other similar documentation indicating that Hoch Sanitation Company (Valley Disposal) picked up nonhazardous trash from the Wagner facility in Boyertown, Pennsylvania.

Cooper also has copies of purchase orders between Novak Sanitary Landfill and Wagner which were obtained from the EPA in response to a FOIA request.

Very truly yours,

Chloe J. Hamilton  
Legal Assistant - Environmental  
077:cjh

COOPER INDUSTRIES, INC.

First City Tower, Suite 4000, P.O. Box 4448  
Houston, Texas 77210  
(713) 739-5400

AR300268

# WRIGHT'S

November 16, 1987

**RECEIVED**

CERCLA REMEDIAL ENFORCEMENT SECTION

NOV 17 1987

**EPA-Region III**

Mr. Michael Towle  
U.S. Environmental Protection Agency, Region III  
PA. CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, PA 19107

Subject: 3HW12

Dear Mr. Towle:

Regarding our telephone conversation of November 13, 1987, I am enclosing all information I have available. Presently, we are under contract with Hoch Sanitation Company to remove all our refuse, which consists of paper, wood, rags and plastic bags.

There is on the premises a 40 cubic yard box with a compacter attached, which is totally enclosed. This 40 cubic yard box is picked up 3 times a week, and taken by Hoch Sanitation to a site unknown to me. There are not any liquids taken by Hoch Sanitation.

If there are any questions, please do not hesitate to call me.

Sincerely,

WRIGHT'S FABRICS, INC.

*Frank Marth*

Frank Marth  
Operations Manager

Telephone: (215) 821-8200

WRIGHT'S FABRICS, INC. AR300269

P. O. BOX 6128, LEHIGH VALLEY, PENNSYLVANIA 18001 [215] 821-8200



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW12

NOV 03 1987

Mr. Frank Marth  
Wright's Fabrics, Inc.  
1801 Union Boulevard  
Lehigh Valley, PA 18001

Re: Novak Sanitary Landfill  
Lehigh County, PA

Dear Mr. Marth:

The Environmental Protection Agency (EPA) is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e), your company is requested to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its officers, employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), which were transported to, or stored, or disposed of at the Novak Sanitary Landfill located along Orefield Road in South Whitehall Township, Lehigh County, Pennsylvania (see enclosed location map).

EPA has information indicating that the Novak Sanitary Landfill was or may have been the final destination for waste materials transported from your company.

All information and documents requested are due to the EPA Region III contact named below within ten (10) calendar days of receipt of this letter.

The response should include, but not be limited to, information and documentation concerning:

1. the nature of your business; ~~TEXTILE DYEING AND FINISHING~~
2. the types and quantities of hazardous substances sent to the ~~NONE BEING SENT NOVAK LANDFILL~~  
~~ATTACHED ARE 4 INVOICES FROM VALLEY DISPOSAL FOR 1984 AND WE LONGER UNDER CONTRACT TO VALLEY DISPOS.~~

AR300270



Novak Sanitary Landfill;

3. the date(s) and frequency such substances were sent to the Novak Sanitary Landfill; *SEE ATTACHED INVOICES*

4. the state (i.e., liquid, solid, or gaseous) of the substances sent to the Novak Sanitary Landfill, and the manner in which the substances were stored or disposed (i.e., drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.);

*COMPACTER, RAGS, PAPER, WOOD AND PLASTIC BAGS NO LIQUIDS*  
5. the identity of, and all documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances at, or by your company;

*NONE*  
6. any correspondence between your company and any regulatory agencies regarding such substances; *N/A.*

7. any correspondence between your company and any third party regarding such substances; and *N/A.*

8. copies of any deeds, rights-of-way, leases, or other real interests which your company has in the Novak Sanitary Landfill.

*NONE*  
Please describe any documents that were maintained by your company of the transactions with the Novak Sanitary Landfill including the date of the documents, the author of the documents, the current location of the documents and the current custodian, and all efforts that were taken to identify these documents.

*SEE ATTACHED INVOICES*  
In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies.

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, logs, books of original entry, minutes of meetings, memoranda, notes, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality

AR300271

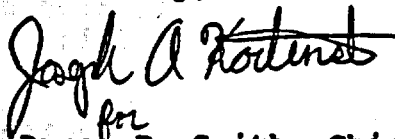
covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

Please send the required information to:

Michael Towle  
U.S. Environmental Protection Agency, Region III  
PA. CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, Pennsylvania 19107

If you have any questions concerning this matter, please contact Michael Towle at (215) 597-3166.

Sincerely,



for  
Bruce P. Smith, Chief  
Hazardous Waste Enforcement  
Branch

enclosure: Location Map

cc: James Snyder, PADER

AR300272

Response of W.R. Grace & Co. to EPA Inquiry on  
the Novak Sanitary Landfill

EPA Inquiry No. 1

The nature of your business.

W.R. Grace & Co. Response

Peters Fertilizer Products is a fertilizer blending and packaging operation servicing the horticultural industry. Among the major uses of Peters Products are in the growing of poinsettias, chrysanthemums, Easter lilies, and bedding plants. Peters also has laboratory facilities to service the horticultural (not agricultural) industry. These facilities analyze nutritionally related criteria in growing media and plant tissues. Peters was purchased by W.R. Grace & Co. in 1979.

EPA Inquiry No. 2

The types and quantities of hazardous substances sent to the Novak Sanitary Landfill.

W.R. Grace & Co. Response

Upon information and belief, Peters did not knowingly dispose of hazardous substances at the Novak Landfill. Those materials taken to the Novak Landfill or handled by Valley Disposal Inc. consisted of wood pallets, paper bags, office trash, samples of soil media, cafeteria trash, empty bags, empty boxes, empty fiber drums, fiber drums used to collect the types of trash mentioned previously, and miscellaneous, non-hazardous, solid waste from plant housekeeping. Some of the bags, boxes, and fiber drums sent to the Landfill or handled by Valley Disposal Inc. formerly contained raw materials used by Peters. ~~Some of these raw materials, many of which were in granular or powder form, contained small or trace amounts of hazardous substances as defined by CERCLA Section 101(14).~~ Since these materials are essential to the production of Peters products every effort was made to remove all such materials, to the extent physically possible, from the bags, boxes, and drums in which they arrived at the Peters facility.

EPA Inquiry No. 3

The date(s) and frequency such substances were sent to the Novak Sanitary Landfill.

W.R. Grace & Co Response

Upon information and belief, Peters did not knowingly, at any date, dispose of hazardous substances at the Novak Landfill. As to the other waste materials referenced in the response to Inquiry No. 2, Peters began to use the Novak Landfill in the early 1970's. At that time the Peters plant

AR300273

was located in Allentown, Pa. and plant trash was transported by Peters personnel to the Landfill. A 1969 Model Ford Van was used to transport this material approximately twice a week to the landfill.

In 1978, Peters moved to its present location in Fogelsville. At that time, Valley Disposal Inc. began picking up plant trash on a daily basis and continued to do so until early 1984. On occasion during this period, Peters would transport trash directly to the Novak Landfill using the Ford Van.

EPA Inquiry No. 4

The state of the substances sent to the Novak Sanitary Landfill, and the manner in which the substances were stored or disposed.

W.R. Grace & Co. Response

Upon information and belief, all materials sent to Novak Landfill or handled by valley Disposal Inc. were in a solid state. Grace is not knowledgeable regarding how these materials were stored or disposed by the Novak Sanitary Landfill.

EPA Inquiry No. 5

The identity of, and all documents relating to, any other person who generated, treated, stored, transported, or disposed, or arranged for the treatment, storage, disposal, or transportation of such substances at, or by your company.

W.R. Grace & Co. Response

Grace interprets this inquiry to request information on persons other than Grace, Valley Disposal Inc., and the Novak Sanitary Landfill, who may have relevant information about the Novak site. Upon information and belief, Grace has no such information.

EPA Inquiry No. 6

Any correspondence between your company and any regulatory agencies regarding such substances.

W.R. Grace & Co. Response

Upon information and belief, no such correspondence exists.

EPA Inquiry No. 7

Any correspondence between your company and any third party regarding such substances.



**RECEIVED**  
CERCLA REMEDIAL ENFORCEMENT SECTION

NOV 24 1987

**EPA-Region III**

November 17, 1987

Mr. Michael Towle  
U.S. Environmental Protection Agency  
Region III  
PA CERCLA Remedial Enforcement Section  
(3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, Pennsylvania 19107

Re: 104(e) Information Request  
Novak Sanitary Landfill  
Lehigh County, PA

Dear Mr. Towle:

We are writing in response to the November 3, 1987 104(e) Information Request pertaining to Novak Sanitary Landfill.

Safety-Kleen's Kuhnsville, PA facility (PAD 980552020) is a hazardous waste storage facility operating under interim status. The Part A application lists and the facility stores the following wastes:

D001, D008	Mineral spirits
F002	Dry cleaning solvent residues
F002, F004	Immersion cleaner (a corrosive chlorinated mixture)
F003, F005	Paint related wastes

Additionally, our Restaurant Services operation is located at the facility. This operation provides cleaning products and services to restaurants. It is not involved in hazardous waste management.

From July 18, 1986 to the present a six cubic yard municipal waste dumpster with twice weekly service has been provided to the facility by Hoch Sanitation of Allentown, Pennsylvania. Enclosed is a service agreement between Safety-Kleen and Hoch Sanitation dated July 18, 1986. Prior to that date a four cubic yard dumpster with once weekly service was provided for municipal waste. It is not documented how long Hoch Sanitation has provided service to the referenced facility, although personal recollections indicate possibly for ten years.

Mr. Michael Towle  
November 17, 1987  
Page 2

The referenced Safety-Kleen facility has disposed of the following solid wastes via Hoch Sanitation:

- Typical office waste (paper, food, etc.)
- Empty drums (crushed)
- Empty polyethylene liner bags for drums (discontinued October, 1987)
- Filters containing small metal pieces (discontinued October, 1987)

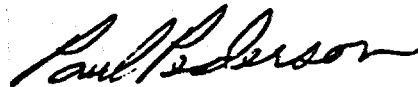
The wastes were all solids. No hazardous wastes were disposed of in the dumpster. Safety-Kleen shipped all other materials to one of our reclamation facilities for processing.

Enclosed is a Hazardous Waste Facility Certificate of Liability Insurance covering the facility.

We have no other information that would be responsive to the Information Request.

Please contact me if further information is necessary.

Sincerely,



Paul Pederson  
Environmental Engineer

PP:nz

Enclosure

cc: Scott Fore  
Mike Paulson, 2-007-01

AR300276

August 8, 1988

**RECEIVED**

CERCLA REMEDIAL ENFORCEMENT SECTION

AUG 10 1988

**EPA-Region III**

Mr. Michael Towle  
U. S. Environmental Protection Agency  
Region III  
PA Cercla Remedial Enforcement Section (3HW12)  
841 Chestnut Street, Sixth Floor  
Philadelphia, PA 19107

Reference: 3HW12

Dear Mr. Towle:

As per our conversation of August 8, 1988 and your indication that a response in paragraph form may suit the needs of the Environmental Protection Association, the Allentown School District is providing you with the following information.

The Allentown School District records indicate that Valley Disposal (Novak Landfill) was granted a trash removal contract by the Allentown School District from 1981 to 1985. ~~By nature of our business (an educational institution for elementary and secondary aged pupils), all the refuse and trash was specifically related to instructional programs, and generally consisted of paper, food waste, discarded books, etc.~~ To our knowledge, at no time was anything other than the normal waste products of elementary or secondary schools included, and certainly, to our knowledge, did not contain any toxic and/or hazardous substances.

Valley Disposal, under normal circumstances, did pick up the trash at each of the twenty-five buildings in our District — generally on a twice a week basis. The Allentown School District itself had a license to dump in South Whitehall Township. However, it was a courtesy that was extended to us by South Whitehall Township, and the District never paid to dump anything; thus, there are no records of any cost. What we actually did transport to Novak Landfill was unusable furniture from the schools. This occurred infrequently and we no longer have the license.

If you have need of any additional information, please do not hesitate to call.

Sincerely,



SAMUEL A. MILLER  
Assistant Superintendent

SAM/d-048

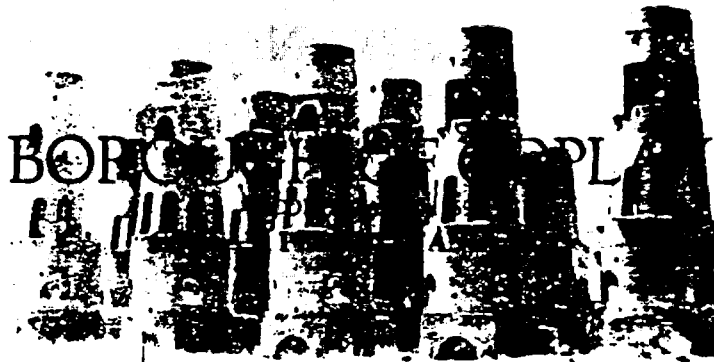
AR300277

**OFFICERS:**

Josephine F. Shemanski, Mayor  
Richard J. Mortimer, President  
Gerald M. Deutsch, Vice President  
Warren P. Miller, Secretary  
Charles R. McGinley, Treasurer  
Richard J. Haber, Solicitor  
Ribello E. Bertoni, Engineer

**MEMBERS OF COUNCIL:**

Forrest E. Laubach  
Julian W. Newhart  
Helen P. Schnecker  
George L. Martin  
Robert D. Deifer



**RECEIVED**

August 1, 1988  
CERCLA REMEDIAL INVESTIGATION SECTION

Re: Ref. To: 95010

**AUG 04 1988**

Mr. Michael Towle  
211 Chestnut Street, 6th Floor  
Philadelphia, Pa.

**EPA-Region III**

Dear Mr. Towles:

It has been four years since we used the Novak Landfill that is located in South Whitehall Township. I have been in charge of the Sanitation Dept. for the last 14 years and will answer your questions as best I can.

1. The Coplay Sanitation Dept. removes the garbage from all the households in the Borough and also from 48 business places most of them on the smaller side. Several of the larger business places are picked up by private haulers.

2. To the best of my knowledge we did not haul any hazardous waste other than what may be picked up at any household.

3. In the 70's and early 80's we hauled 4 or 5 loads in our 16 or 20 cubic yard truck, all household garbage and yard waste.

4. None hauled.

5. No documents.

6. No correspondence.

7. No correspondence.

8. No deeds or interests in the Novak Sanitary Landfill.  
No insurance involved.

The Borough still handles its own garbage and hauls to the Christman Sanitation Relay Station at New Smithville. We started to recycle 4 years ago and have been able to cut our amount hauled to the relay station by 40%.

Sincerely,

*Warren P. Miller*

Warren P. Miller, Secy.

and Road Foreman

AR300278





**P A R K L A N D  
S C H O O L D I S T R I C T**

ADMINISTRATION OFFICE  
OREFIELD, PA 18069-0200

CARMEN J. RIOLA  
Superintendent  
215-398-2658  
JEFFRY E. GRIM  
Secretary/Business Manager  
215-398-2361

**RECEIVED**

ENVIRONMENTAL PROTECTION AGENCY

AUG 10 1988

EPA-Region III

August 8, 1988

Mr. Michael Towle  
U.S. Environmental Protection Agency, Region III  
PA CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, PA 19107

Dear Mr. Towle:

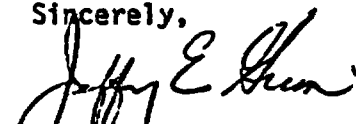
The following is in response to your letter of July 28, 1988, requesting information on waste taken to Novak Sanitary Landfill located in South Whitehall Township.

The last date materials were taken to Novak was in April of 1982, at which time approximately twenty cubic yards of roofing materials, consisting of felts and wood, were included.

We are unable to provide any information of waste transported prior to 1982. However, we are not aware of any hazardous materials disposed of prior to 1982.

Please contact me should you require additional information.

Sincerely,

  
Jeffrey E. Grim  
Secretary

JEG:ral

AR300279