SDMS Document

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July 19, 2005

Michael J. van Itallie, Esquire
Assistant Regional Counsel
United States Environmental Protection Agency
Region 2
290 Broadway
New York, New York 10007-1866

Re: Martin Aaron Superfund Site

Dear Michael:

This office represents certain recipients of EPA's June 9, 2004 and February 14, 2005 Notice Letters regarding the Martin Aaron Superfund Site. Those parties have joined together to form the Martin Aaron Site PRP Group ("Group") to collectively respond to EPA's demand for reimbursement of past costs.

PENNSYLVANIA

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700001

KLETT ROONEY LIEBER & SCHORLING

Michael J. van Itallie, Esquire July 19, 2005 Page 2

In that regard, without admission of responsibility or liability for site conditions and without waiver of any applicable defenses to EPA's claims under CERCLA or otherwise, we enclose herewith, for inclusion in the Administrative Record, a Report prepared by de maximis Inc., captioned "Summary of Historical Ownership and Uses of the Martin Aaron Superfund Site and Select Nearby Properties".

Very truly yours,

Louis M. DeStefano

For KLETT ROONEY LIEBER & SCHORLING

A PROFESSIONAL CORPORATION

LMD/mbm

cc: Mr. Mark Austin

SUMMARY OF HISTORICAL OWNERSHIP AND USES OF THE MARTIN AARON SUPERFUND SITE AND SELECT NEARBY PROPERTIES

Prepared by de maximis, inc.

July 19, 2005

TABLE OF CONTENTS

Executive Summary

- I. Introduction
- II. General Property History
- III. Historical Use/Ownership/Occupancy of Martin Aaron Property and Surrounding Area
- IV. Historical Use/Ownership/Occupancy of Adjacent Properties
 - A. Lot 26 and Lot 3
 - B. Lot 29
 - C. Property North of Everett Street
 - D. Property West of Broadway (South Jersey Port Property)
 - E. Property East of Sixth Street (Camden Iron and Metal)
 - F. NJ Department of Motor Vehicles/State Inspection and Repair
- VI. General Information Regarding Tanning Process
- VII. Potential Impacts to the Environment from Past Site and Nearby Operations
 - A. On Site Historical Operations
 - B. Adjacent Properties

Figures

- 1. General Property/Lot Boundaries with Ownership/Occupancy Information
- 2. 1886 Baist Map
- 3. 1891 Sanborn Map of Block 460
- 4. 1895 City of Camden Map
- 5. 1902 Baist Map
- 6. 1906 Sanborn Map of Block 460
- 7. 1926 Sanborn Map of Block 460
- 8. 1940 Aerial Photo
- 9. 1950 Sanborn Map of Block 460
- 10. 1951 Aerial Photo
- 11. 1957 Aerial Photo
- 12. 1963 Aerial Photo
- 13. 1966 Aerial Photo
- 14. 1971 Aerial Photo
- 15. 1974 Aerial Photo
- 16. 1982 Sanborn Map of Block 460
- 17. 1985 Aerial Photo
- 18. 1994 Sanborn Map of Block 460
- 19. Location of Adjacent Known Contaminated Sites (2001 NJDEP)
- 20. Lithograph illustrating the Camden White Lead Works

TABLE OF CONTENTS

- 21. 1906 Sanborn Map of Block 461 (Camden Iron and Works Property)
- 22. 1926 Sanborn Map of Block 461 (Camden Iron and Works Property)
- 23. 1950 Sanborn Map of Block 461 (Camden Iron and Works Property)
- 24. 1982 Sanborn Map of Block 461 (Camden Iron and Works Property)
- 25. 1994 Sanborn Map of Block 461 (Camden Iron and Works Property)

SUMMARY OF HISTORICAL OWNERSHIP AND USES OF THE MARTIN AARON SUPERFUND SITE AND SELECT NEARBY PROPERTIES

EXECUTIVE SUMMARY

A preliminary review was conducted of publicly-available information regarding the ownership and use history of the current Martin Aaron Superfund Site property and properties in the immediate vicinity of that property. This review was not intended to be exhaustive but adequate to better understand the use history of the property and surrounding area.

This area of Camden has a long and varied history of heavy and light industrial use extending back into the early 1800s. As with most of the land along the Delaware River, filling was done to raise the land surface to enable development of the former marshlands.

The Martin Aaron property consists of the majority of the land between Broadway and Sixth, Jackson and Everett Streets in the Waterfront South section of Camden. Before being purchased by Martin Aaron, Inc. in 1968, the property was occupied by companies predominantly engaged in leather tanning operations, leather manufacturing, and wool and hair blending. These operations were active by the 1880s and continued into the 1940s. There is ample documentation and it is generally accepted that tanning operations during this time period routinely used or generated a variety of natural and man-made chemicals and solutions. Some of these included organic/artificial tannic acids, arsenic solutions, trivalent chromium salts, lime, ammonia, sodium chloride, sodium sulfide, sodium hydrosulphide, sulfuric acid, sulfates, nitrogen, aluminum, zirconium, cadmium (used for coloring) and un-named solvents for cleaning. Properties with a similar history are documented Superfund or state-regulated sites as a result of soil contaminated with arsenic, chromium, lead, and other tannery process-related compounds.

In addition, almost all industries in the late 1800s and early 1900s used coal as the primary source of fuel for heating, production and electricity. The documents reviewed as part of this evaluation clearly show this to be the case for the industries in the Camden area in general, and specifically for the Martin Aaron site and adjacent properties. Maps and illustrations show that coal was often stored in open piles on the property. The coal-fired ovens, boilers and generators produced ash. Soil borings from the Martin Aaron site contained evidence of cinders and ash. Cinders and ash are widely known to result in elevated levels of PAH compounds (such as benzo(a)pyrene). Residual coal in soil can also result in elevated levels of semi-volatile compounds in soil samples. The presence of PAH compounds is also well documented on other Superfund sites where tanneries were operating.

The tannery buildings, especially the Beam House, were located generally immediately north of what was the Martin Aaron drum washing building. Later, expansion and alteration resulted in

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 1 of 24 July 19, 2005



tannery buildings and a beam house being located in the area that later was used by Rhodes Drum. Coal piles appear to have moved around the property at various times depending on the location of buildings. Other parcels immediately adjacent to the Martin Aaron property were used over time by many businesses with some association to tanning. These included slaughterhouses, provision dealers, shoe manufacturing, brush making, bookbinding, and even white lead manufacturing (which uses tannic acids and spent bark in the manufacturing process).

The property east of the Martin Aaron property (Block 461 across Sixth Street) is currently occupied by Camden Iron and Metal, a large metal salvage yard. For some period prior to 1899 and continuing into the 1920s, Camden White Lead Works, a large-scale producer of White Lead¹, occupied this property. Lead production during this timeframe is described in the literature as involving the smelting and corroding of lead by acids followed by grinding and crushing. In addition to potential lead contamination of soil, groundwater and air, lead processing operations were known to result in waste dross containing impurities such as copper, arsenic, antimony, bismuth and silver. There were no regulations on the disposal of lead dross in the 1800s or early 1900s.

Many of the industries in the area have utilized underground storage tanks containing diesel fuel, heating oil and gasoline. This includes the property to the west of Broadway currently known as the South Jersey Port property. Liedtka Trucking used this property for many decades and the property is on the NJDEP Known Contaminated Sites Lists due to the removal of underground storage tanks. There is also another NJDEP Known Contaminated site on that block (former NJDEP inspection station) where underground fuel storage was an environmental issue.

Between the current Martin Aaron property and Everett Street is a wedge-shaped parcel known as the "scrapyard". From approximately 1940 through possibly 1964, Kimble Glass owned and operated a factory on this property used to make glass and ceramics. It is general knowledge that the manufacture of glass and ceramic utilizes barium carbonate and lead in the glazing process. It is also general knowledge that arsenic was used in glass manufacturing to purify the glass or ceramic.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 2 of 24 July 19, 2005



¹ White lead is a mixture of lead carbonate and lead hydroxide (PbCO₃)₂ · Pb(OH)₂ that has been used for over 2000 years as a white pigment. It often is adulterated with barite (BaSO₄). As a mixture with linseed oil, it was extensively used as a white pigment and base in paints. It also was used in making putty and pottery.

I. INTRODUCTION

The following provides a summary of *de maximis*' compilation, review and evaluation of information regarding the ownership and/or occupancy of the current Martin Aaron property, as well as information regarding the owners/occupants of adjacent properties.

The following information was reviewed:

1. Property Title Search Report prepared by TechLaw in 1999 for the USEPA

TechLaw was retained by the USEPA in 1999 to conduct a title search of the Martin Aaron property. The report contains information and documents such as deeds, liens, judgments, lis pendens, mortgages, encumbrances, foreclosures, last testament and wills. The title search findings are based on research conducted by TechLaw at the Camden County Clerk's, Tax Assessment, and Surrogate Offices, Camden County, NJ.

2. Property Insurance Maps from Sanborn and Baist

The Sanborn maps are of varying quality and legibility. The maps reviewed and included in this report are for years 1891, 1906, 1926, 1950, 1982 and 1994.

3. Aerial Photographs

Aerial photographs from 1940 through 1985 were obtained and used to confirm information in the Sanborn maps, as well as to confirm when buildings were constructed or removed. Aerial photos from 1940, 1951, 1963, 1966, 1974, and 1985.

4. Internet Search for Information on Owners/Occupants

A search of the Internet was done using search engines such as Dogpile® and Google® based on individual's names, company names, or other key words that might be associated with the search subject. Broadly, Internet sites that provided useful information included federal and state regulatory websites (such as USEPA and DNREC); colleges (e.g. Bryn Mawr College), local associations (e.g. Philadelphia Architects) and private websites (such as www.dvrb.com), which contain historical information regarding the City of Camden and its residents.

5. Information from Environmental Data Resources (EDR)

EDR provided information from their search of regulatory databases, Sanborn maps, well searches and other public information.

6. Internet Search of Industrial Processes

A search of the Internet was completed regarding the potential industrial processes that might be associated with the property owner(s)/occupant(s) (e.g. tanning).

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 3 of 24 July 19, 2005

7. Review of Information at the Camden Historical Society

The Camden Historical Society contains archived information on the history of Camden, including photographs, maps, atlases and other documents.

II. GENERAL PROPERTY HISTORY

Figure 1 summarizes ownership information regarding the various properties discussed in this document. The current Martin Aaron property was originally part of a larger parcel referred to in the property deeds as Tract 1. Tract 1 was generally bounded by property along Jackson Street to the south; Broadway to the west; Everett Street to the north; and the Conrail railroad to the east. In approximately 1884, Tract 1 was subdivided to create Tract 2, which is referred to in the Title Search Report as an area north of the "ditch", "Line Ditch", or "Little Newton Creek" that traverses the property from southeast to northwest. The 1906 Sanborn map indicates this feature as a "Line Ditch". The Line Ditch is also identified in the literature as "Kaighn's Run, and served as a boundary in Camden to divide the lands of the Kaighn and Mickle families. Later, it served as the southern boundary of the South Ward. Documents state that "Over time and development in the area, the stream began to fill up and became merely a ditch, to which, by common consent, the name Line Ditch was given." In this report, the feature is identified as the "Ditch". It is worth noting that the Ditch is not present in the 1926 Sanborn map, suggesting that by this time it had been filled.

Tract 2 was subsequently subdivided. A portion of the original Tract 2 was ultimately joined back with Tract 1 in 1911.

In approximately 1891, the City of Camden obtained an easement through Tract 1 for the purpose of constructing Sixth Street. This is referred to in the Title Search Report as Exception 2 to Tract 1. Concurrently, Exception 1 to Tract 1 was created and conveyed by the owner to another party. For reference, Exception 1 is the Block 461, now occupied by Camden Iron and Metal.

In 1940, the City of Camden obtained the property consisting of Tract 1 (less Exception Area 1 and Exception Area 2) from Castle Kid Company as a result of delinquent taxes. Immediately following, the City of Camden sold this property to the Schmerling Brothers. It appears from the title search however, that the City of Camden excepted a third parcel of land during this sale, which subsequently became Lot 29. Martin Aaron, Inc. bought its property from the Schmerlings in 1968.

The following provides a detailed chronological history of the Martin Aaron property, adjacent properties and their uses.

Summary Of Historical Ownership And Uses
Of The Martin Aaron Superfund Site And Select Nearby Properties
Page 4 of 24
July 19, 2005



III. HISTORICAL USE/OWNERSHIP/OCCUPANCY OF MARTIN AARON PROPERTY AND SURROUNDING AREA

3/25/1884 - 4/18/1887

Tract 1 was owned by Mr. Fred Kifferly. When Mr. Kifferly died, the property was willed to John M. Harper. No information was found on the Internet regarding Mr. Kifferly or Mr. Harper.

On August 22, 1884, Charles and Henrietta Moore sold the property north of the Ditch to Sarah Moore. No information regarding the Moores was found on the Internet.

1886 Baist Map (Figure 2)

The 1886 Baist Map indicates that the Morroco Manufactory and Fred Fifferly (a likely misspelling on the map) occupied the property south of the Ditch. There is also shown a drainage ditch on the property south of the Ditch (Kaighn's Run) that would have likely served to drain surface water from the property into the Ditch.

The property north of the Ditch is indicated as being owned by J.W. Purnell estate.

<u>4/18/1887 - 8/11/1887</u>

Mr. John M. Harper sold the property south of the Ditch to Jacob Rossbach. No additional information regarding Jacob Rossbach was found on the Internet.

8/11/1887 - 9/15/1887

Jacob and Rosa Rossbach sold the property south of the Ditch to Kifferly Morocco Manufacturing Company. Based on the company name, it is possible that the Kifferly Morocco Manufacturing Company was in some way related to Mr. Fred Kifferly, who previously owned the property. Based on subsequent property transactions between the Rossbachs and Kifferly Morocco (see below), it is possible that the Rossbachs were in some way involved in the ownership of the Kifferly Morocco Company.

August 21, 1890

Sarah and John Moore sold the property between the Ditch and Everett Street to the Universal Drier & Digester Company. No information was found on the Internet regarding the Universal Drier & Digester Company.

1887 - 1892

The Title Search Report indicates that during this period, Kifferly Morocco Manufacturing Company owned Tract 1. The 1891 Sanborn map (Figure 3) shows that the Kifferly Morroco buildings are located in the central/west portion of the property adjacent to Broadway (now Block 460). In approximately 1891, the City of Camden obtained an easement through Tract 1

Summary Of Historical Ownership And Uses

Of The Martin Aaron Superfund Site And Select Nearby Properties

Page 5 of 24

July 19, 2005



for the purpose of constructing Sixth Street. This is referred to in the Title Search Report as Exception 2 to Tract 1. Concurrently, Exception 1 to Tract 1 was created and conveyed by the owner to another party. For reference, Exception 1 is the Block 461, now occupied by Camden Iron and Metal.

The 2000 NJDEP Draft Final Remedial Investigation Report states that the Kifferly Morocco Manufacturing Company "specialized in the tanning and glazing of hides and leathers." No specific information regarding Kifferly Morocco was found on the internet. The use of the buildings occupied by Kifferly Morocco are described on the 1891 Sanborn map using terms consistent with tanning operations, such as "skin storing, drying, drying lofts, beam house and coloring, glazing, and gondola finishing" (Note that general tanning operations are described in more detail in Section VI). There are other buildings shown that appear to be associated with Kifferly Morocco, however their descriptions are not legible. The 1891 Sanborn map also identifies a "well" adjacent to the main building, but no specific details. As described below in Section VI, water was used in the tanning operations. The Sanborn map identifies the company used coal for its tanning process, electric (generators) and steam heat.

In December of 1892, Kifferly Morocco, with Leopold Rossbach as the President, sold the property to Jacob and Rosa Rossbach. On the same day, Jacob and Rosa Rossbach sold the property to Richard F. Stack. Again on the same day, Richard F. Stack sold the property to Jacob and Leopold Rossbach, trading as J. H. Rossbach & Bros.

The internet identified J. H. Rossbach & Bros. as a company doing business in Brazil and Portugal in 1897. It is not known if this reference relates to the company that owned the subject property. There was no other information that identified the business nature of J.H. Rossbach & Bros. There was also no information on the internet regarding Richard F. Stack.

September 4, 1891

Universal Drier sold only the portion of the property north of the Ditch and identified in Figure 1 as Tract 2 to John Kern. As stated above, the Sanborn map does not indicate what operations may have occurred on this property. The other land associated with the property north of the Ditch and south of Everett Street subsequently became Lots 4 and 10, however were never part of the property owned by Martin Aaron Inc. Accordingly, the Title Search Report did not follow the ownership history of Lots 4 and 10.

1895 City of Camden Map (Figure 4)

This map shows the property south of the Ditch to be occupied by the National Colored Morocco Works. The property north of the Ditch is identified as being occupied by the Universal Drier and Digester Company.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 6 of 24 July 19, 2005



1902 Baist Map (Figure 5)

This map indicates that the property south of the Ditch to be owned by the Kifferly Morrocco Company and occupied by the Morrocco Factory. The N.Z. Graves & Company owns the property north of the Ditch (note that this is the same company that owned the Camden White Lead Works west of Sixth Street, discussed later in this report). There is a building of unspecified use shown north of the Ditch.

September 29, 1904

John Kern sold Tract 2 to John Donges. According to Internet sources, John Donges was a prominent local physician who opened a pharmacy in the 1800 block of Broadway, three blocks away from the site. The use of the Tract 2 property by Dr. Donges is not known.

1906 Sanborn Map (Figure 6)

The 1906 Sanborn map shows that the Castle Kid Company now occupies the buildings formerly occupied by Kifferly Morocco. The Castle Kid Company is identified on the map as a "Manufacturer of Glazed & Mat Kid". Compared to the 1891 Sanborn map, the 1906 Sanborn map shows that the tannery buildings have been modified and enlarged and the operations have expanded on the property to the southwest. Additional processes identified on the 1906 Sanborn map are "fleshing and tanning, seasoning & mixing, 1st ironing & hot room, staking room, putting out & wash room, lime house, coal sheds, and open coal bins". The map also indicates that there are six (6) wells connected to the Castle Kid Company buildings.

The 1906 Sanborn map illustrates the "Line" or "Line" Ditch. The property north of the Ditch does not appear as being subdivided, even though the Title Report has the property being subdivided to form Tract 2. The map shows there to be some structures on the land north of the Ditch, but access was "refused".

January 29, 1908

The Title Search Report indicates that J.H Rossbach & Bro. granted the property and premises to the Castle Kid Co., Inc. of New Jersey, for one dollar. A page in the deed identified the contents of the manufacturing business to include boilers, engines, machinery and shafting equipment.

June 16, 1911

Castle Kid Co., Inc. of New Jersey purchased the small portion of property to north of the Ditch (Tract 2) from John Donges, bringing Tract 1 and a portion of Tract 2 under the same ownership.

December 9, 1919 - May 14, 1924

Castle Kid Co., Inc. of New Jersey owned the property until it was sold to Castle Kid Co., Inc. of Delaware.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 7 of 24 July 19, 2005



May 14, 1924

Castle Kid Co., Inc., of Delaware sold the property to Castle Kid Co., Inc. of New York.

1926 Sanborn Map (Figure 7)

Castle Kid Co. is shown as occupying the same buildings as in the 1906 Sanborn map, as well as additional buildings to the south and west of the 1906 facility. Some of the buildings are labeled as CNG & DYN RM (assumed to be a cutting and drying room), a boiler, store room, wash room, striking room, cutting out No.12 room, locker room and numerous pipes. Two new buildings were added; a warehouse and a beam house. As described below in the Section IV, a beam house is an area of the tannery where lime, arsenic, acids and other chemicals are routinely used. It is worth noting that a portion of this beam house ultimately became the Rhodes Drum facility, as shown on the NJDEP RI figures and discussed below. All of the buildings between the row homes and the Martin Aaron property are now constructed.

In contrast to the 1906 Sanborn map, there is no reference to any wells in the 1926 Sanborn map. The disposition of these wells is not known. There are numerous six-inch and eight-inch water pipes shown connecting the various buildings and a pipeline connected to a 12" pipeline on Broadway. In addition, the 1926 map does not identify the Ditch, suggesting that it had been filled.

The NJDEP 2000 RI Report states that based on a 1921 Sanborn map (which has not been located), the Castle Kid Company included a railroad spur, a 200 gallon buried gasoline tank, a laboratory, a liming system complete with four (4) above-ground settling tanks and an 85,000 gallon suction tank.

The 1926 Sanborn map suggests that subdivision of the land north of the Ditch into what are now known as Lot 4 and Lot 10 has occurred. A scrap metal yard is located in the NW corner of the property north of the Ditch. There are a number of buildings identified as "stge" (presumed to indicate storage).

Adjacent to and west of the scrap metal yard is a factory building of unspecified type and purpose.

May 14, 1924 - March 8, 1940

Castle Kid Co., of New York owned the property until the City of Camden foreclosed on the property in 1940 as a result of delinquent taxes. The Title Search Report documents identify Lee Arnstein as the Vice President of Castle Kid Co. of New York and Milton Schloss as the Treasurer. No information could be found on the internet regarding Lee Arnstein or Milton Schloss.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 8 of 24 July 19, 2005

October 30, 1940

The City of Camden sold the property to Benjamin R. Schmerling and Herman Schmerling, with the exceptions noted in prior deeds (Exceptions 1 and 2), plus an excepted area to the south of the Martin Aaron property that is currently identified as Block 460, Lot 29. There is no specific information provided in the Title Search Report or on the internet that would identify what the Schmerlings did with the property until it was sold to Martin Aaron in 1968, however the 1950 Sanborn map (below) suggests that the Schmerlings allowed the H. Preston Lowden Company to use the buildings on the property.

1940 Aerial Photo (Figure 8)

The 1940 aerial photo clearly shows multiple buildings present on the current Martin Aaron property. The buildings are generally consistent with the 1926 Sanborn map and the 1950s Sanborn map (below).

1950 Sanborn Map (Figure 9)

There remain some structures in the area previously occupied by the Castle Kid Co., of New York, all of which are indicated as being vacant.

The warehouse built by Castle Kid around 1926 (at the southwest corner of the current Martin Aaron property) is now occupied by H. Preston Lowden Co, which is identified as a "wool and hair blending factory and warehouse." There was no information on the internet regarding this company. The 2000 NJDEP RI Report states that the H. Preston Lowden Company leased the building from the Schmerlings, although no corroborating information was found. This building is identified in the 2000 NJDEP RI Report as "Former 3-Story Brick Building" where soil borings/samples were collected.

The portion of the property north of the Ditch previously used by a scrap metal company is now identified as vacant. The western portion of Lot 4 appears to be occupied by a building, but the map is not legible. It is possible that this is the same building identified in the 1982 Sanborn map as a bakery house.

The "factory building" identified in the 1926 Sanborn map north of the Ditch is now identified as the Kimble Glass - Glass Factory, a Division of Owens-Illinois Glass Co. No information is available on the details of the Kimble Glass operations at this location. Generally, the Kimble Division of Owens-Illinois manufactures specialty glassware, laboratory glass tubing and pharmaceutical glassware.

1951 Aerial Photo (Figure 10)

The features on the Martin Aaron property in this aerial photo are consistent with those identified in the 1950 Sanborn map.

Summary Of Historical Ownership And Uses
Of The Martin Aaron Superfund Site And Select Nearby Properties
Page 9 of 24
July 19, 2005



1957 Aerial Photo (Figure 11)

In comparison to the 1951 aerial photo, there does not appear to be a significant change in the number of buildings on the current Martin Aaron property.

1963 Aerial Photo (Figure 12)

The buildings on the Martin Aaron property appear relatively unchanged compared to the 1957 aerial photo.

1966 Aerial Photo (Figure 13)

The building centrally located on the Martin Aaron property is no longer present. The remaining buildings appear to be consistent with the 1963 aerial photo.

June 18, 1968

The Schmerlings sold the property to Martin Aaron in 1968.

1971 Aerial Photo (Figure 14) (Note – Martin Aaron took title to the property in 1968)

A new building appears along the southern boundary of the property north of the 3-story building previously occupied by H. Preston Lowden.

1974 Aerial Photo (Figure 15)

No new buildings appear to have been constructed since 1971.

1982 Sanborn Map (Figure 16)

The 3-story brick building formerly occupied by H. Preston Lowden Company is now identified as non-specific "machinery storage".

The building currently known as the Rhodes Drum Building is identified in the 1982 Sanborn map. Adjacent and east of this building is noted "open drum storage".

A Bake House (bakery) now occupies the northwest corner of the property (north of the Ditch) that was shown as "vacant" in the 1950 Sanborn map.

The lot previously occupied by Kimble Glass is now is vacant. There is no information available regarding when Kimble Glass vacated the property.

1985 Aerial Photo (Figure 17)

The 1985 aerial photo is of poor quality, however all of the buildings identified in the Martin Aaron property in the 1982 Sanborn map appear to be present.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 10 of 24 July 19, 2005



1994 Sanborn Map (Figure 18)

This map provides no additional information relative to different owners or tenants on the property. The two drum storage areas shown on the 1982 Sanborn are no longer shown on this map.

A Bake House (bakery) occupies Lot 4. Lot 10 is now vacant.

IV. HISTORICAL USE/OWNERSHIP/OCCUPANCY OF ADJACENT PROPERTIES

The information regarding the history/use of other properties in the immediate vicinity of the current Martin Aaron property was limited to what was identified on the Sanborn maps or in the EDR Report, as these properties (Lots or Blocks) were not the subject of the Title Search Report. These properties include Lot 26, Lot 3, and Lot 29 in Block 460 (same Block as the Martin Aaron Site), Block 458 (South Jersey Port Property) and Block 461 (currently occupied by Camden Iron and Metal).

A. Block 460: Lot 26 and Lot 3 Properties (South of Martin Aaron Site)

1886 Baist Map (Figure 2)

This map indicates that the Isaac Ferris Shoe Factory occupies the Lot 3 and Lot 26.

1891 Sanborn Map (Figure 3)

The 1891 Sanborn map suggests that there was some subdivision of the land originally owned by Fred Kifferly.

The 1891 Sanborn map shows buildings used for "stock fitting and cutting" by Isaac Ferris Shoe Manufacturing. The map also identifies the facility using coal as the fuel for its power and steam heat and gas for its lighting. Although the history of this facility is included in this report, it appears that this property (now known as Block 460, Lot 26) is not part of the Martin Aaron Superfund Site.

The W. Hills and Brothers company is identified on the 1891 Sanborn map as a "Provisional Dealer", with buildings identified as "shed, cooler, ice machine, pork house, slaughter house." No specific information was found on the internet for this company.

1895 City of Camden Map (Figure 4)

This map doesn't show the lots, however there is a building shown near the corner of Jackson and Broadway.

1902 Baist Map (Figure 5)

Summary Of Historical Ownership And Uses
Of The Martin Aaron Superfund Site And Select Nearby Properties
Page 11 of 24
July 19, 2005

This map indicates the presence of a facility called the "Nor. Indus. Sch", which may be indicative of a local Industrial School and a "Slaughter House.".

1906 Sanborn Map (Figure 6)

The 1906 Sanborn map indicates that Lot 26 may not have yet been created and the land is part of the property owned by Castle Kid Company. It appears that Lot 3 is now defined separately from other lots.

The 1906 Sanborn map indicates that Lot 3 contains buildings occupied by W. Mills & Bro. - Abattoir (Slaughterhouse). W. Mills appears to have added buildings and sheds for additional cattle storage. The map also identifies four (4) wells of unspecified use.

A portion of the space previously occupied by the Isaac-Ferris Shoe Company is now occupied by the American Addograph Company, which is identified as "Office Machine manufacturing and assembly". A search on the internet only identified the American Addograph Company as a manufacturer of adding machines.

1926 Sanborn Map (Figure 7)

Lot 26 is apparently vacant. In Lot 3, the American Addograph Company is gone and the southwest corner of the lot is shown on the map as having a "Vacant Factory Building".

The buildings previously occupied by W. Mills & Bro. (Abattoir/Slaughterhouse) are now shown as being occupied P. D. Hughes Co., Pork Packers. No information was found on the internet regarding this company.

1940 Aerial Photo (Figure 8)

The photo shows buildings to be present generally consistent with the 1926 Sanborn map.

1950 Sanborn Map (Figure 9)

Lot 26 appears to be vacant.

In Lot 3, an unspecified "abattoir" occupies the building(s) to the south of the property formerly occupied by P.D. Hughes.

1951 Aerial Photo (Figure 10)

The features on Lots 3 and 26 in this aerial photo are consistent with those identified in the 1950 Sanborn map. A building present in the 1940 aerial photo in this area has apparently been demolished.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 12 of 24 July 19, 2005



1957 Aerial Photo (Figure 11)

In comparison to the 1951 aerial photo, there does not appear to be a significant change in the number of buildings on Lots 3 and 26.

1963 Aerial Photo (Figure 12)

The buildings on Lots 3 and 26 appear relatively unchanged compared to the 1957 aerial photo.

1966 Aerial Photo (Figure 13)

The buildings on Lots 3 and 26 appear to be consistent with the 1963 aerial photo.

1971 Aerial Photo (Figure 14)

The buildings on Lots 3 and 26 appear consistent with the 1966 aerial photo.

1974 Aerial Photo (Figure 15)

No new buildings appear to have been constructed on Lots 3 or 26 since 1971.

1982 Sanborn Map (Figure 16)

Lot 26 is shown as vacant, consistent with the 1974 aerial photo.

Lot 3 is partially vacant and also occupied by Dietz and Watson, Inc (Abattoirs).

1985 Aerial Photo (Figure 17)

The 1985 aerial photo is of poor quality, however the features appear to be consistent with the 1982 Sanborn map.

1994 Sanborn Map (Figure 18)

By 1994, Lots 3 and 26 appear to have been combined. The buildings are identified as containing "Eng. & Refrig. & and Mach." It is believed by this time that the property/buildings are owned and operated by Comarco Quality Pork Products, although that has not been confirmed.

B. Block 460 Lot 29

As described above, Lot 29 appears to have been created when the City of Camden sold Tract 1 (without Exceptions 1 and 2) to Benjamin and Herman Schmerling in 1941. The ownership history of this lot was not part of the Title Search Report. As such, any information regarding Lot 29 is derived from the Sanborn Maps.

1886 Baist Map (Figure 2)

This map suggests that Lot 29 is vacant, but part of the property owned by Fred Kifferly/Morrocco Manufactory.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 13 of 24 July 19, 2005



1891 Sanborn Map (Figure 3)

The area subsequently defined as Lot 29 appears to be vacant, but part of the property owned by Kifferly Morocco.

1895 City of Camden Map (Figure 4)

This map does not indicate any information for Lot 29.

1902 Baist Map (Figure 5)

This map suggests that Lot 29 is vacant, but part of the property owned by Kifferly Morrocco Company.

1906 Sanborn Map (Figure 6)

The area subsequently defined as Lot 29 appears to be vacant, but part of the property owned by Castle Kid Company.

1926 Sanborn Map (Figure 7)

The area subsequently defined as Lot 29 is occupied by the "Beam House" associated with the Castle Kid Company. There appears to be another building present, but the map is not legible.

1940 Aerial Photo (Figure 8)

The photo shows buildings to be present generally consistent with the 1926 Sanborn map.

1950 Sanborn Map (Figure 9)

There appear to be two buildings on this lot. One building is occupied by the American Chain and Cable Company. The occupant of the other building cannot be discerned on the map.

The building formerly identified as the "beam house" associated with the Castle Kid Co., is now shown to be occupied by the American Chain and Cable Company (AC&C). The 2000 NJDEP RI Report states that AC&C (specifically the PA Lawn Mower Division) leased the building from the Schmerlings, although no corroborating information was found. To the contrary, the Title Search Report (as noted above) suggests that this property was not conveyed by the City of Camden to the Schmerlings in 1941, but was excepted from that sale. This lot may have been subsequently transferred to the Schmerlings, but since this parcel is not part of the current Martin Aaron property, the Title Search Report did not track its subsequent ownership history. There is considerable information regarding the American Chain and Cable Company on the internet, as they appear to have facilities throughout the northeast. No information could be found regarding the "PA Lawn Mower Division"; however AC&C had facilities in Wilkes Barre, PA and Reading, PA.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 14 of 24 July 19, 2005

1951 Aerial Photo (Figure 10)

There appear to be two buildings on this lot.

1957 Aerial Photo (Figure 11)

There appears to be no significant changes since 1951.

1963 Aerial Photo (Figure 12)

There appear to be no significant changes since 1957.

1966 Aerial Photo (Figure 13)

There appear to be no significant changes since 1963.

1971 Aerial Photo (Figure 14)

There appear to be no significant changes since 1966.

1974 Aerial Photo (Figure 15)

There appear to be no significant changes since 1971.

1982 Sanborn Map (Figure 16)

There remain two buildings on this lot. One building is identified as a warehouse and the other identified as "Fire Proof Constn" with offices and a machinery shop. The buildings are shown to be occupied by Haddon Bindery and used for "storage only". Haddon Bindery is identified on the internet as existing at 11th and Linden Streets in Camden. It was found on the internet that Haddon Bindery bound bibles, school textbooks, novels, Book-of-the-Month-Club books, and medical and other professional books. The firm was founded in 1942 by John H. Esak and closed in 1976.

1985 Aerial Photo (Figure 17)

The 1985 aerial photo is of poor quality, however the features appear to be consistent with the 1982 Sanborn map.

1994 Sanborn Map (Figure 18)

The two buildings remain. The building that was the "Beam House" in 1926 is now vacant. The other building appears occupied, however the map is illegible.

C. Property North of Everett Street

Neither the Baist maps nor the Sanborn maps provide any information regarding the ownership/operation on the property immediately north of Everett Street. The 1886 Baist map indicates Everett Street was formerly called Culvert Street.

Summary Of Historical Ownership And Uses

Of The Martin Aaron Superfund Site And Select Nearby Properties

Page 15 of 24

July 19, 2005



D. Block 458 - Property West of Broadway (South Jersey Port Corporation) 1886 Baist Map (Figure 2)

This map indicates that the Camden Horse Car Railway Company owned Block 458. The Ditch (Kaighn's Run) cuts east-west across Block 458. Property owned by William Mitchell exists in the southwest corner of Block 458.

1902 Baist Map (Figure 5)

The information on this map is consistent with the 1886 Baist map.

1940 Aerial Photo (Figure 8)

This photo shows the buildings in the southwest corner of the property. There appears to be a fence surrounding a large portion of the property.

1951 Aerial Photo (Figure 10)

A large parking lot has been constructed in the central-southern portion of the property.

1957 Aerial Photo (Figure 11)

A number of buildings have been constructed on this block and it there appears to be containers present in an organized pattern.

1963 Aerial Photo (Figure 12)

The facility appears to have undergone some expansion/changes since 1957.

1966 Aerial Photo (Figure 13)

There appear to be no significant changes since 1963.

1971 Aerial Photo (Figure 14)

There appear to be a number of significant changes since 1966. A large building has been constructed in the central portion of the property and some of the buildings along the property's northern boundary have been removed.

1974 Aerial Photo (Figure 15)

There appear to be no significant changes since 1971.

1985 Aerial Photo (Figure 17)

There do not appear to be any significant changes since 1971.

Figure 19 illustrates the location of Liedtka Trucking as reported on the NJDEP website. The information on the NJDEP website indicates the following:

Summary Of Historical Ownership And Uses

Of The Martin Aaron Superfund Site And Select Nearby Properties

Page 16 of 24

July 19, 2005



- Address: 1535 South Broadway
- Facility ID/Known Contaminated Site List (KCSL ID): NJL600060602
- Case ID: 1129005254
- Leaking Underground Storage Tank ID: 0095583
 - o Medium Diesel Fuel (No. 2)
 - Removed on 1/28/1992

A report obtained from NJDEP through an OPRA request indicate that Leidtka Trucking was issued a Deficiency Letter in January 1992 indicating that the closure of the underground storage tanks was deficient. No other follow-up documents were provided under the OPRA request.

E. Block 461 - Property East of Sixth Street

As mentioned above the City of Camden obtained an easement through Tract 1 for the purpose of constructing Sixth Street in 1891. The property west of Sixth Street is referred to as Exception 2 area in the deeds and is now known as Block 461.

1886 Baist Map (Figure 2)

This map suggests that Block 461 is vacant and owned by the estate of John Mickle. There is a drainage feature that appears to drain surface water from this block into Kaighan's run (Ditch).

1891

The Title Search Report indicates that in 1891, Kifferly Morocco granted to George P. Steele, William Van Rosseau, and Joseph Peoples, trading as Steel Van Rosseau and Co., a second exception to Tract 1 (Exception 1).

1895 City of Camden Map (Figure 4)

This map shows Block 461 as being occupied by the George P. Steele Iron Company, with a number of buildings and structures present.

1899 - Camden White Lead Works

A website associated with Bryn Mawr College ("http://www.brynmawr.edu") identifies an illustrated monograph by Moses King published in 1900, entitled "N.Z. Graves & Co., And Camden White Lead Works". This monograph includes King's illustration of the Camden White Lead Works operations in 1899 (see **Figure 20**). The features in the illustration are generally consistent with the information in the 1906 Sanborn map (e.g. buildings, railroads, boilers, water tower, coal storage). The lithograph portrays the operations as being substantial in size, involving considerable smelting and emissions from smokestacks.

1902 Baist Map (Figure 5)

This map indicates that this property is occupied by the Camden White Lead Works and owned by the N.Z. Graves and Company.

Summary Of Historical Ownership And Uses
Of The Martin Aaron Superfund Site And Select Nearby Properties
Page 17 of 24
July 19, 2005

1906 Sanborn Map (Figure 21)

This map identifies this lot as being occupied by the Camden White Lead Works. The map shows buildings/areas with the following descriptions: "lead storage, corroding shed, lead crushing, grinding & drying, furnace house, open coal pile storage, and rock storage". The map also identifies the presence of "six 4 inch artesian wells" and numerous storage areas.

Most lead used in the early 1900s was based on lead carbonate, known as "white lead". The product was manufactured by subjecting lead to corrosion, yielding a white powder. After some processing (such as grinding), the powder was sold as "dry white lead" to paint manufacturers or was ground with linseed oil and sold as paint.

Information on the internet (www.ancientroute.com/resource/metal/lead.htm) indicates that to make white lead for pigment, the 'Dutch process' was used in the 1800s and early 1900s (hence, Dutch Boy Paints). The lead ore was "partially immersed in acetic acid, old wine, and covered with spent tanning bark". The chamber was then stuffed, closed, and allowed to 'ferment' for a few months. Essentially, this is the corrosion process of the lead. Grinding of the corroded lead produced the pigment.

According to the same website, today, lead is separated by a floatation method. After being mixed with limestone, coke and a little iron ore, the mix is roasted. The limestone forms a slag, while a matte forms which contains metallic impurities. The molten lead is tapped off. This form is called 'hard lead', and may contain impurities such as copper, arsenic, antimony, bismuth and silver along with the lead. The hard lead is melted and stirred, the stirring causing oxidation of the impurities. These impurities rise to the surface as slag and are scraped off as dross. For some time, dross was not recycled by the industry, but discarded as a waste.

The Sanborn maps and the lithograph clearly identify/show piles of coal being stored on the property, suggesting that this industry likely also produced ash.

1926 Sanborn Map (Figure 22)

The 1926 Sanborn map shows that the Bridgman Company, a plumbing supplier, now occupies the property. It appears that all of the buildings associated with the Camden White Lead Works have been removed, except for the Furnace House, which is occupied by the Bridgman Company. There was no information found on the internet regarding this company.

Frank Harris Sons Co., Inc, a lumber yard, exists in the southern portion of the property. Lumber storage piles are noted. The Rutgers Library website identifies the Frank Harris Sons Co. existing in 1924 in Wrightstown, NJ.

Summary Of Historical Ownership And Uses
Of The Martin Aaron Superfund Site And Select Nearby Properties
Page 18 of 24
July 19, 2005



Railroad spurs continue to exist on the property. There is a building in the extreme southeastern corner of the property, but its description is not legible.

1940 Aerial Photo (Figure 8)

This photo shows that some of the buildings from the Camden White Lead Works appear to still exist.

1950 Sanborn Map (Figure 23)

The northern portion of the property is identified as a Scrap Iron Yard with craneways, railroad spurs and storage. In the southeast corner of the property, there is a building identified as "Electroplating".

1951 Aerial Photo (Figure 10)

The features on this photo are difficult to discern, however it appears that the large building in the central portion of the property has been dismantled.

1957 Aerial Photo (Figure 11)

There appear to be piles of material present and the remnants of the overhead craneway systems.

1963 Aerial Photo (Figure 12)

No obviously discernable features are present other than what appear to be small buildings, piles of material and vehicles.

1966 Aerial Photo (Figure 13)

There appear to be no significant changes since 1963.

1971 Aerial Photo (Figure 14)

There appear to be no significant changes since 1966.

1974 Aerial Photo (Figure 15)

There appear to be no significant changes since 1971.

1982 Sanborn Map

The property is identified as a Scrap Iron Yard with craneways, railroad spurs, storage buildings and a shear house.

1985 Aerial Photo (Figure 17)

There appear to be no significant changes since the 1971 and features generally consistent with the 1982 Sanborn map.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 19 of 24 July 19, 2005

1994 Sanborn Map

The property is identified as a Scrap Iron Yard with craneways, railroad spurs, storage buildings, warehouses and a shear house.

F. New Jersey Department of Motor Vehicles/State Inspection and Repair

This property is located north immediately north of the Port Jersey Port Corporation property, as shown on Figure 19 with the following information from EDR and the NJDEP website:

- NJDEP Known Contaminated Sites List (2001) ID: NJL600249676
- UST Facility ID: 003543
 - 0 11/4/94
 - Removal of "waste oil" tank
 - 0 9/28/05
 - Case Status: Active
 - Subsection Label: Sites With On-Site Source(s) of Contamination
 - 0 5/5/2000
 - Removal of two (2) "unleaded gasoline" tanks.
 - Removal of one "medium diesel fuel" tank.
- LUST Facility ID: 003543
 - 0 5/17/2001
 - o Case ID: 94-12-20-1311
 - o Remedial Level: Site has confirmed soil and groundwater contamination
 - o NJDEP Case Manager: Gary Sanderson

A facility can be seen at this location beginning with the 1940 aerial photo (**Figure 8**) and continuing through the 1985 aerial photo (**Figure 17**). The 1974 aerial photo (**Figure 15**) suggests an active facility with access from Broadway.

VI. GENERAL INFORMATION REGARDING TANNING PROCESS

The following is a general discussion of the tanning process as compiled from available literature. Tanning is the process by which animal skins are converted into leather. Most industrial tanneries erected in the late 19th century consisted of a cluster of ramshackle, utilitarian structures, each of which represented a specialized work area, such as the beam house, hide house, leach house, tan yard, tanning vats, hair drying house and finishing shops.

Tannin, the principle component of the tanning of leather, was derived from the leaching of ground tree bark in large vats (usually oak or hemlock, sumac, willow, cherry and chestnut). Tanneries would store bark in the bark shed to prevent rainwater from leaching the tannins from

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 20 of 24 July 19, 2005



the exposed wood. The bark mill would grind the dry bark into small fragments to enhance the leaching process. The bark was then placed in a large, mechanically-agitated wooden drum that was used to remove the tannins from the milled bark.

The leather hides would first be washed/soaked in pure water, for the purpose of cleansing and softening the skins, and preparing them for the depilation (unhairing). The unhairing involved soaking the hides in a lime vat (liming), which was a wooden or masonry vat containing lime solutions of various strengths. The hides or skins were put into the vat and allowed to remain from 7 to 14 days. Hides were also reported to be treated with an arsenic solution to enhance the hair-removal process.

When the hair would slip, the hides were taken out of the lime and/or arsenic solution and plunged into clean water, from which they went to the beam house where the hair was scraped off with a long curved blunt-edged knife. They were then immersed in water again and taken back to the beam house where all of the flesh was removed.

To soften the leather prior to tanning, the hides were placed in water impregnated with chicken dung, pigeon droppings, dog feces or fermented bran. This is called "bating", which is the process in which the hide were rotated in the bate (bate wheel). By means of the muriate of ammonia which it contains, the lime taking the acid becomes muriate of lime, which is soluble and easily worked and washed out of the skins, while the ammonia passes off in a gaseous state. Hides would remain in this bath for 1 to 5 days according to the weather (a longer time being required in cold than in hot weather), and during this time they are taken out 2 or 3 times and placed on the beam where they are scraped, first on the grain side, and lastly on both flesh and grain with a worker similar to the one used in unhairing

When the hides or skins were taken from the beam-house, they were put into vats containing a weak solution of ground bark (or a solution of leached water from the bark), and were handled two or three times a day until they are evenly colored. Some tanneries used a rocker vat, wherein the hides would be agitated by mechanical rocker arms for up to two weeks. The hides might have been placed into a layaway vat for an extended period of time (3 weeks to a month) or gone into a vat with stronger solutions, where they might remain a week, being taken out daily and allowed to drain off. At the same time, the tanning solution would be strengthened.

When the sole-leather was tanned it is taken out of the vats, washed clean, and hung up to dry in the rolling loft. When nearly dry it was rolled on the grain with a brass roller until it was smooth, hung up again, and thoroughly dried, and is ready for the market.

Between 1900 and 1904 (around the time of Kifferly Morocco and Castle Kid), the tanning process in Europe began using trivalent chromium salts as their tanning agent, which shortened

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 21 of 24 July 19, 2005



the process time from eight months to weeks. This process appeared in the United States shortly thereafter. Today, tanning operations involve several chemicals and generate several by-products of the processes, specifically, organic/artificial tannic acids, trivalent chromium salts, lime, ammonia, sodium chloride, sodium sulphide, sodium hydrosulphide, sulphuric acid, sulphates, nitrogen, aluminum, zirconium, cadmium (used for coloring) and un-named solvents.

VII. POTENTIAL IMPACTS TO THE ENVIRONMENT FROM PAST SITE AND NEARBY OPERATIONS

A. On Site Historical Operations

From approximately 1880 to 1940, the current Martin Aaron property was used primarily for leather tanning operations. Information reviewed indicates that sometime during this period, the on site tanning operations may have changed from the use of tannic acids (from bark) to chromic acids/salts. The details regarding the exact process operations at this location (including the disposition of spent acids, wash water, etc.) is not known. Given the time frame, it is reasonable to believe that there were few restrictions on the handling of tanning acids, arsenic solutions, chromic acids, lime and other solutions. These spent/waste solutions may have been discharged to the ground surface or to the "Ditch" mentioned in the deeds and noted on the Sanborn maps.

General information on the tanning industry and indicates the following compounds and/or chemicals were often associated with the tanning operations:

- Tannic acid
- Trivalent chromium salts (chromium)
- Arsenic (either as a de-hairing solution or for rodent control)
- Lime
- Ammonia
- Sodium chloride
- Sodium sulfides
- Sulfuric acids
- Aluminum, zirconium and cadmium (used for coloring)
- Miscellaneous unspecified solvents (for cleaning)

In 1891, The Kifferly Morocco Company facilities occupied a limited area within the central/west portion of the property. The Castle Kid Company facilities were much larger and occupied a majority of the current Martin Aaron property. In addition, the Castle Kid Company used what is now known as the Rhodes Drum Building as a beam house.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 22 of 24 July 19, 2005 After foreclosure by the City of Camden, the warehouse formerly used by Castle Kid was occupied by the H. Preston Lowden Company, which used it for wool and hair blending. That building is now gone.

It is well documented that tannery operations generally have caused soil and/or groundwater impact requiring remediation. Examples of some former tannery facilities that are now federal Superfund sites are:

- Pownal Tannery Site, VT (chromium, lead, arsenic and PAHs (benzo(a)pyrene)).
- Mohawk Tannery Site, NH (arsenic, cadmium, chromium, lead, SVOCs/PAHs, VOCs).
- Saco Tannery Waste Pits, ME (chromium, arsenic, chlorobenzene, heavy metals).
- Cannelton Industries (NW Leather Co.) Site, MI (chromium, lead, cadmium, arsenic, mercury).

In Michigan, the Department of Environmental Quality (DEQ) is overseeing the remediation of the White Lake Tannery Bay Site, which is reportedly to have been impacted from historical contamination from a tannery. Compounds released to the soil, sediment, surface water and groundwater in an around White Lake include arsenic, mercury and chromium.

More locally, in January 2001, the Delaware Department of Natural Resources and Environmental Control (DNREC) began the "Tannery Sites Initiative", which was an effort to identify sites in the Wilmington area where former tannery and hide processing operations may have left contaminated soil and groundwater (www.tetratech-de.com/tanneries/). Most of the tanneries were located along the historical drainage ways in central Wilmington. DNREC has identified 52 complexes including over 400 separate properties or parcels. It is noteworthy that many of these sites were deemed "not of a human health risk" due to clean soil cover being present.

According to DNREC "the tanning process used a strong arsenic solution to control vermin and de-hair the hides. Hides were soaked in large vats of arsenic solution and scrapped by hand in facilities know as beam houses". In its report summary, the beam house is where DNREC expected the highest concentrations of arsenic in soil to exist. DNREC reports that chromium salts were used to finish hides and elevated concentrations of chromium in soil are of concern. DNREC also describes many of the sites as having elevated levels of lead, in addition to chromium and arsenic.

Based on the Sanborn maps, Kifferly Morocco and Castle Kid Company used coal as a fuel source, and the coal was routinely stored outdoors in piles. Residual coal in the subsurface soils may result in elevated levels of semi-volatile compounds and total petroleum hydrocarbons.

Summary Of Historical Ownership And Uses
Of The Martin Aaron Superfund Site And Select Nearby Properties
Page 23 of 24
July 19, 2005

Rainwater runoff from coal piles is known to be acidic and will often directly or indirectly impact the quality of the underlying soil and groundwater by leaching metals and other compounds from the soil.

B. Adjacent Properties

Adjacent properties might also have impacted the soil/groundwater at or in the vicinity of the Martin Aaron site.

The Kimble Glass Company (Now "the scrapyard")

It is general knowledge that the manufacturing of glass uses materials that contain lead, barium and arsenic. The Kimble Glass Company occupied the property currently referred to as "the scrapyard" north of the Martin Aaron property.

The Camden White Lead Works

Located across Sixth Street (now occupied by Camden Iron and Metal), this operation may have been a possible source of lead contamination in the soil and groundwater, either by surface discharges/materials handling or by possible air emissions.

Based on the Sanborn maps, The Camden White Lead Works also used coal as a fuel source, and the coal was routinely stored outdoors in piles. As mentioned above, open coal pile storage is known to be a source of groundwater and soil impact.

South Jersey Port Property

This property was at one time owned and occupied by Liedtka Trucking Company. Leidtka Trucking Company was identified as an "Active" LUST case by the NJDEP in December 2000.

New Jersey Department of Transportation/Division of Motor Vehicles Property

As of May 2001, the NJDEP Bureau of Underground Storage Tanks had identified this property as a "known source of soil and groundwater contamination", apparently associated with either/or previously removed "waste oil, diesel fuel or leaded gasoline". No further details are known.

This property is currently considered to be hydraulically upgradient of the Martin Aaron property.

Summary Of Historical Ownership And Uses Of The Martin Aaron Superfund Site And Select Nearby Properties Page 24 of 24 July 19, 2005

FIGURES

700030



General Property/Lot Boundaries with Ownership Information

Figure 1

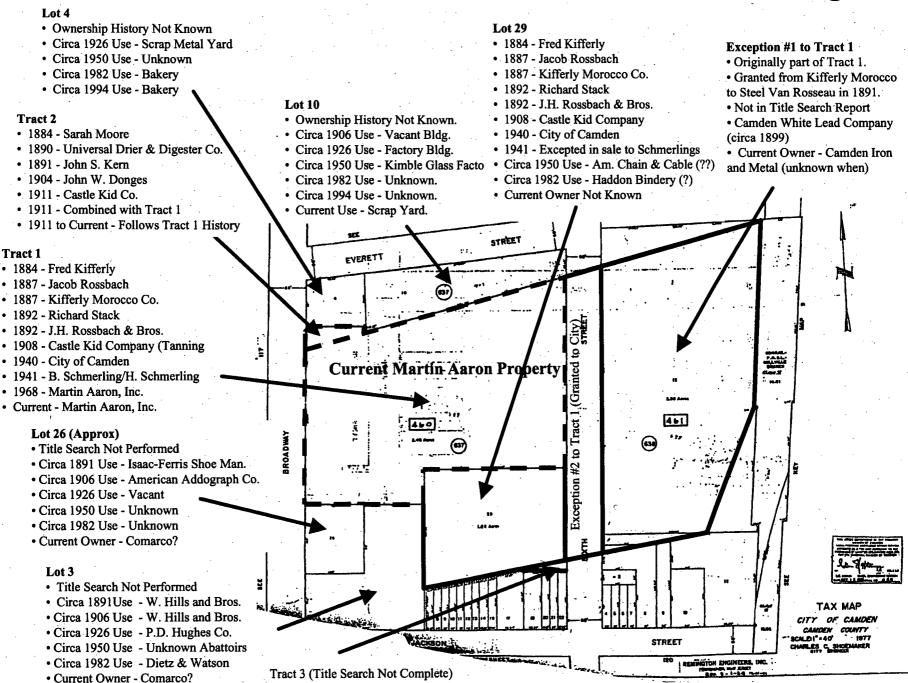
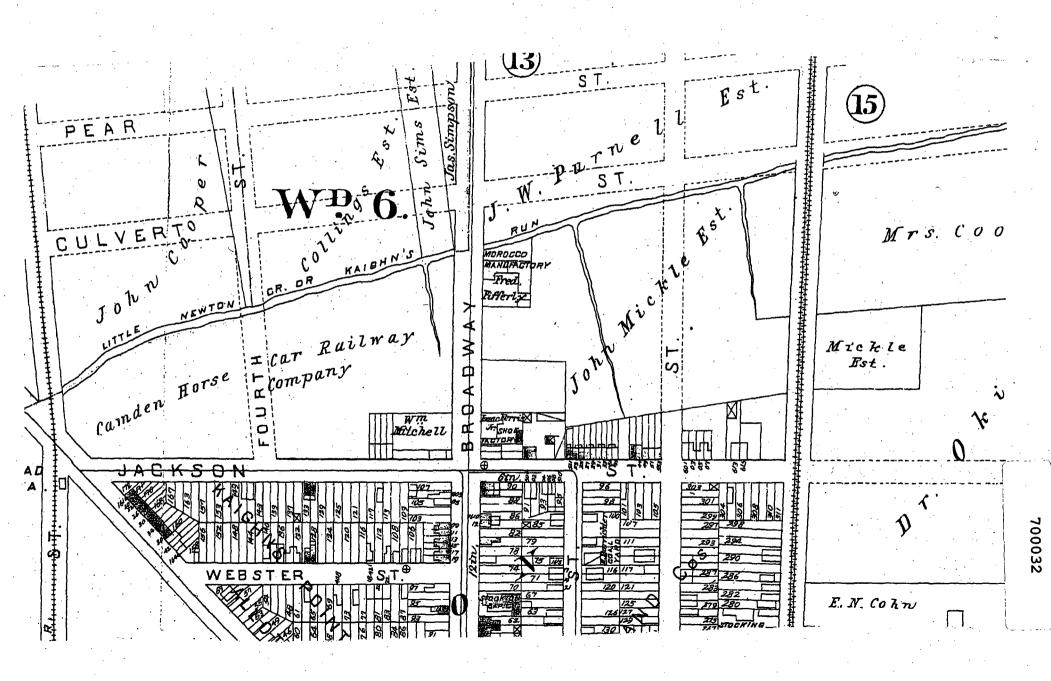
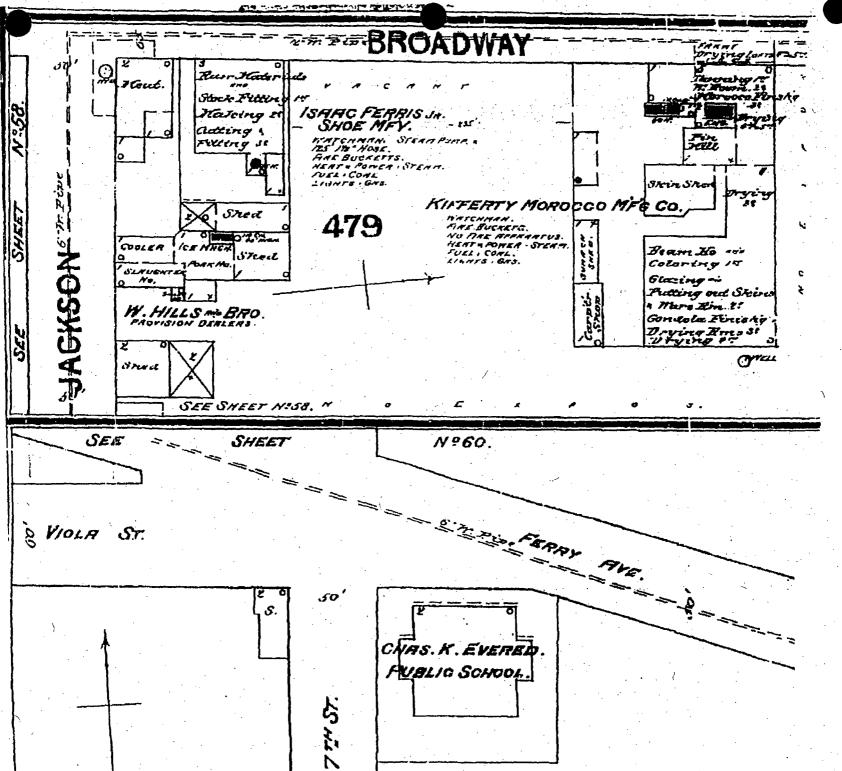


Figure 2

1886 Baist Map

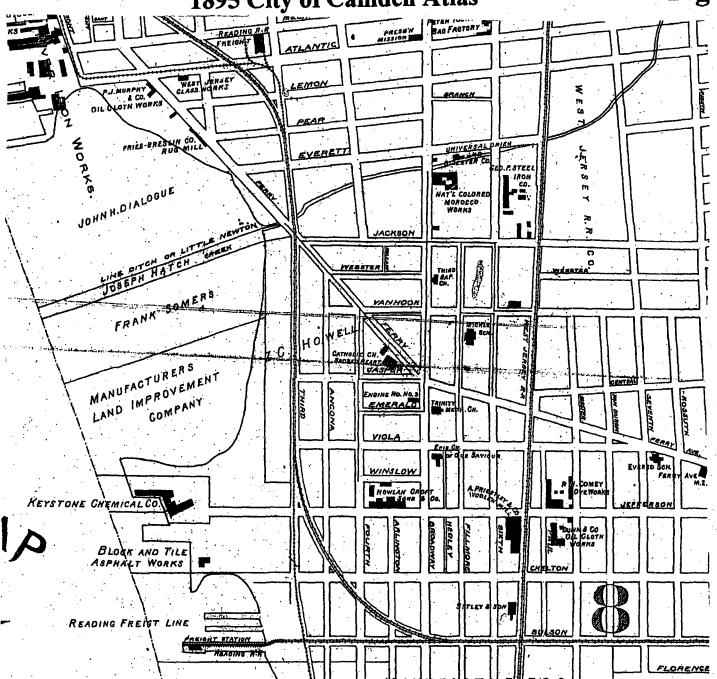


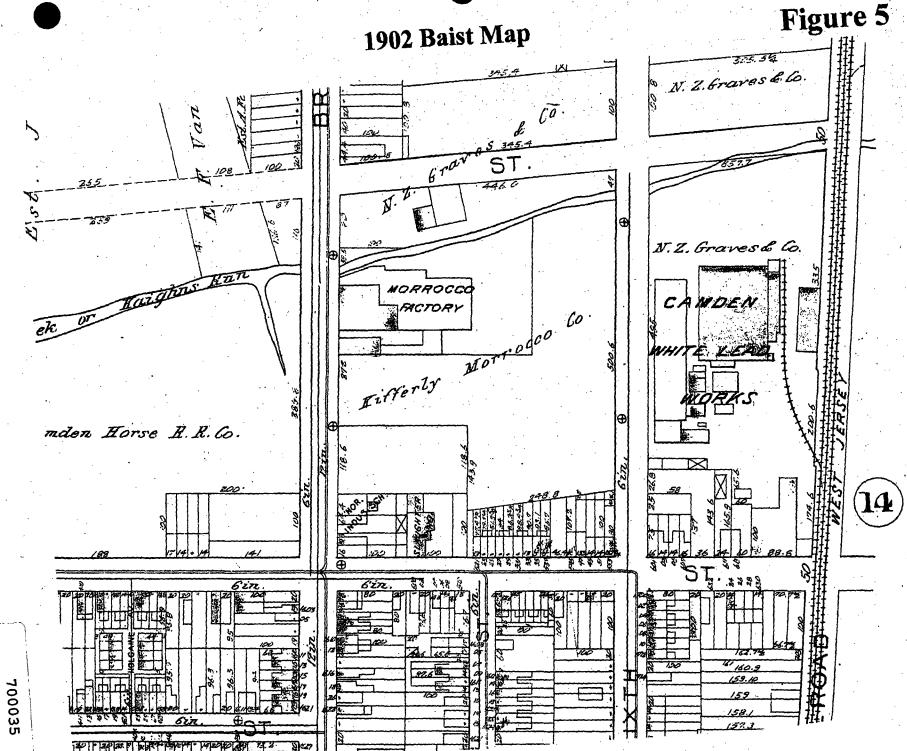
Figure

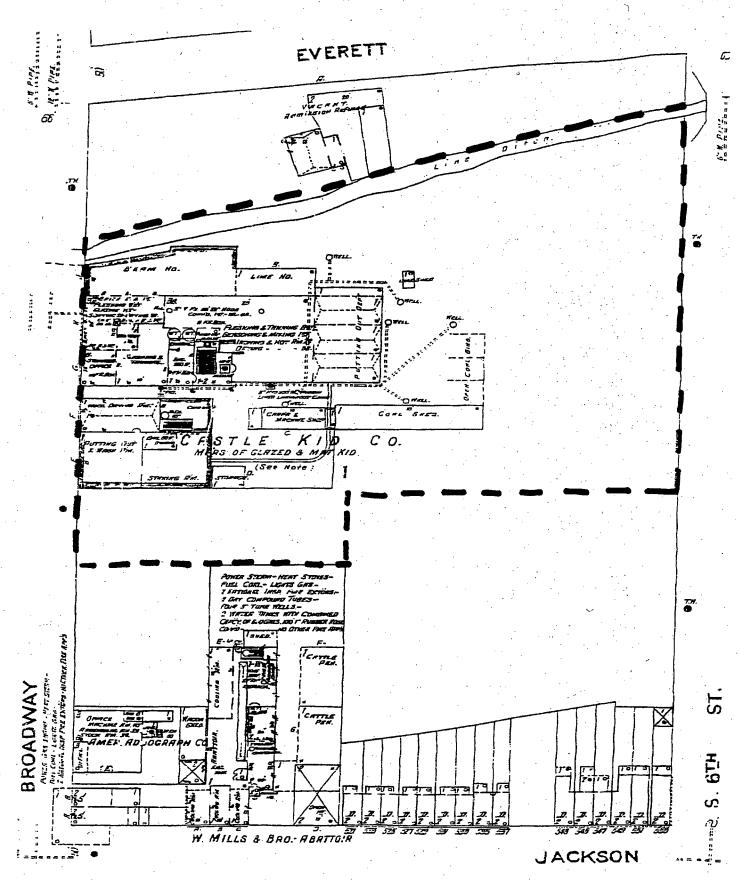


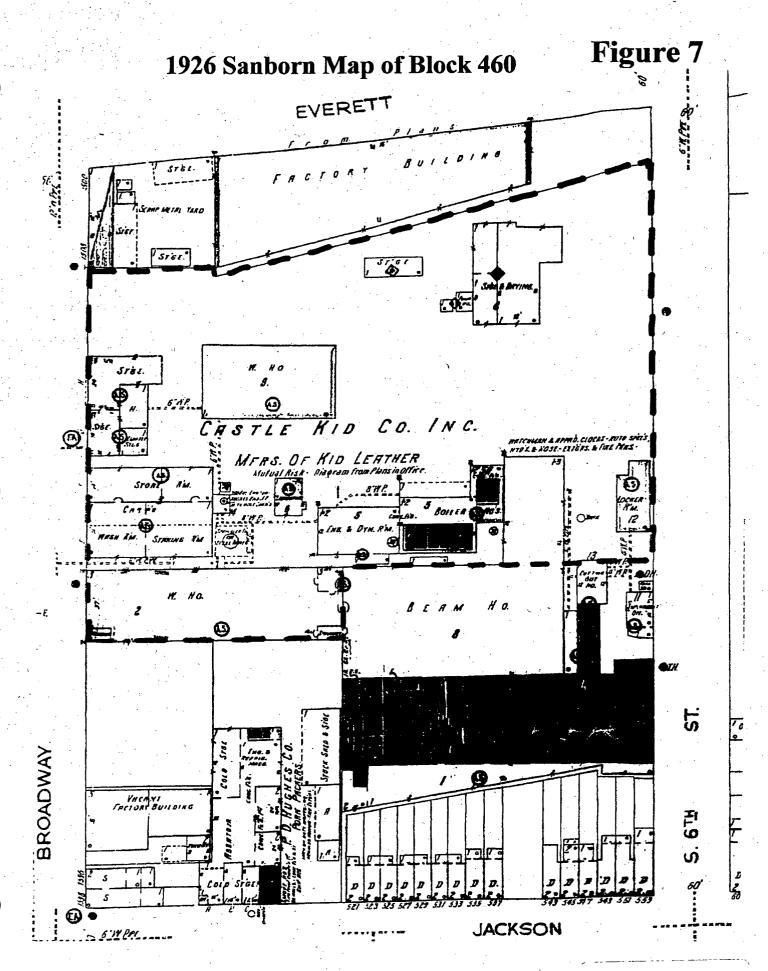
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1895 City of Camden Atlas Figure 4





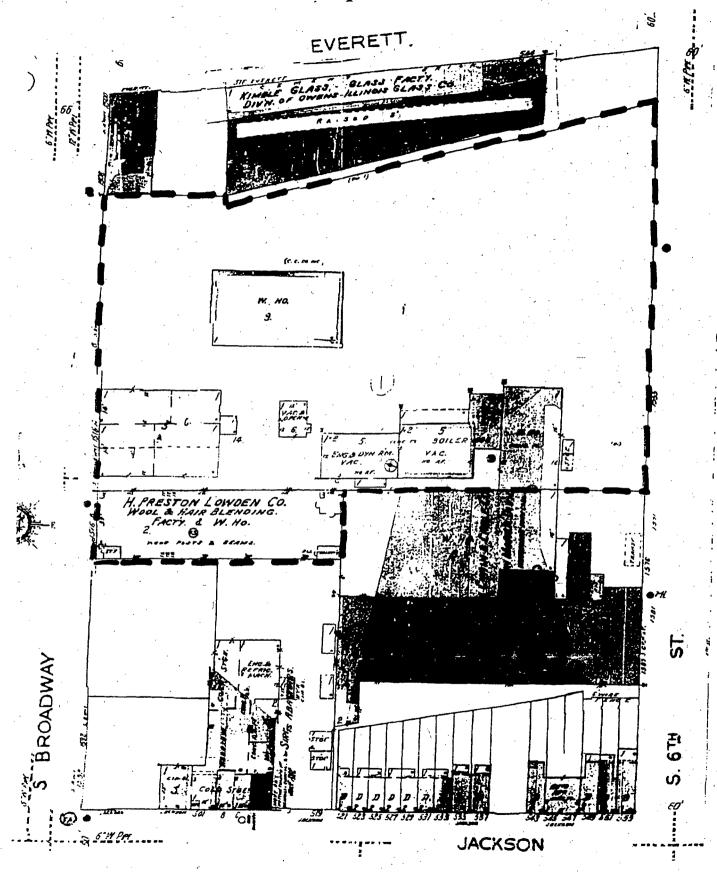




1940 Aerial Photo Martin Aaron Property and Surrounding Area



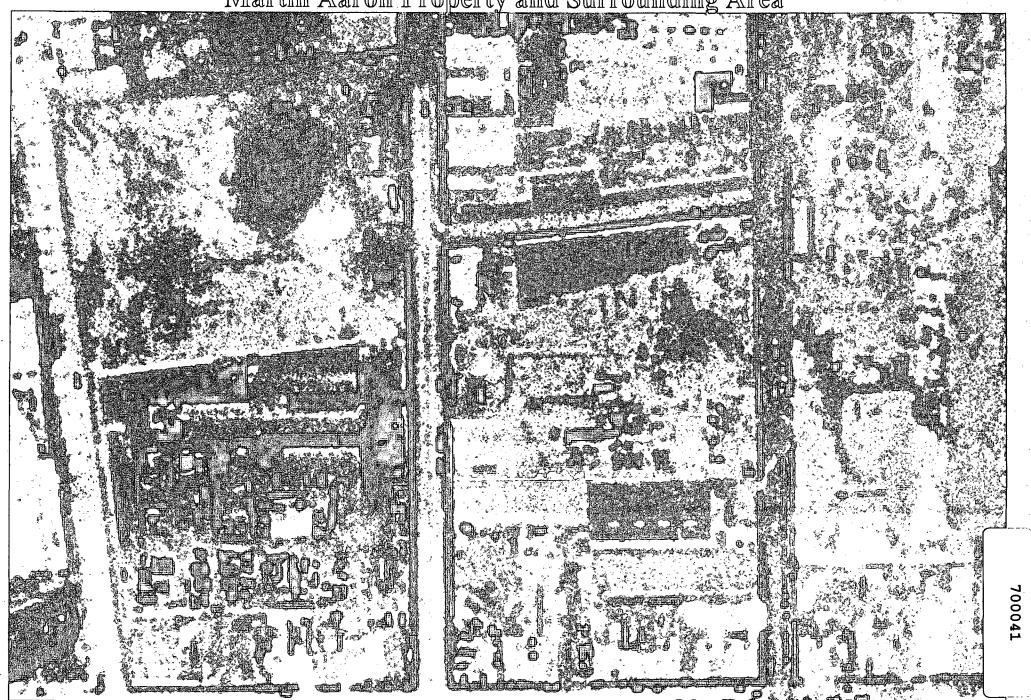
700038



1951 Aerial Photo Martin Aaron Property and Surrounding Area

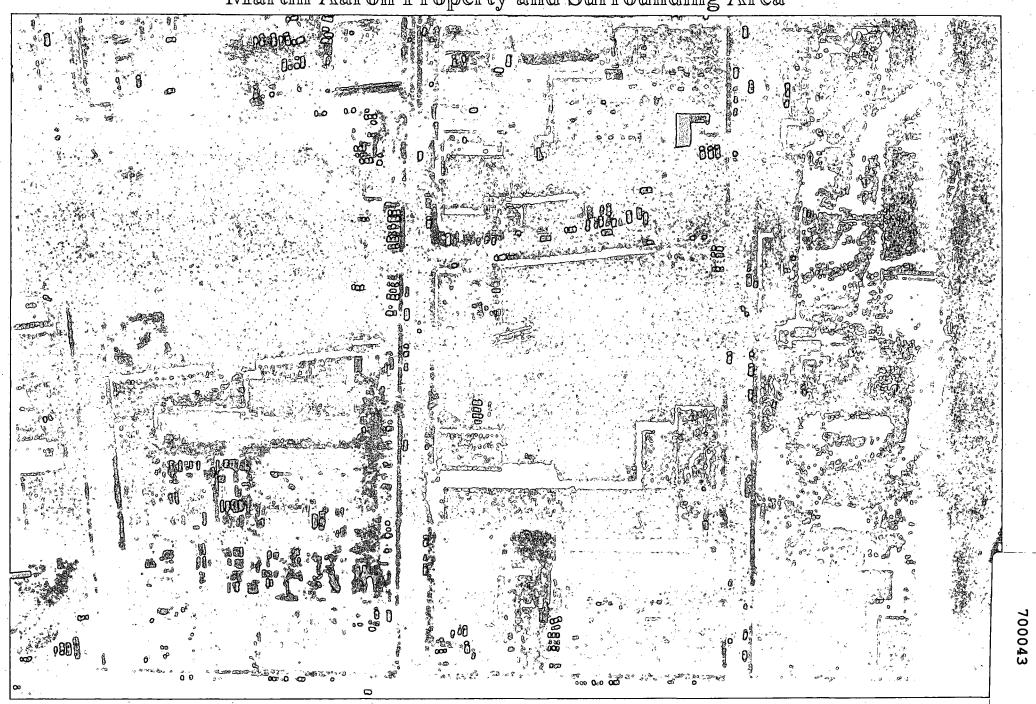
Figure 10



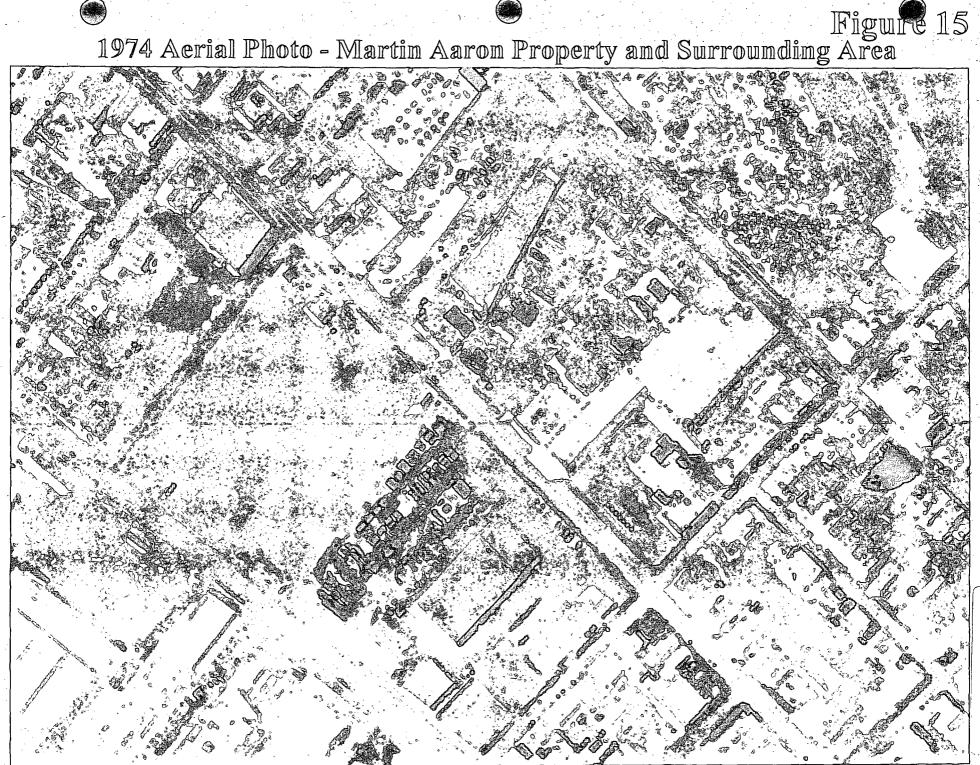


1966 Aerial Photo

Figure 13

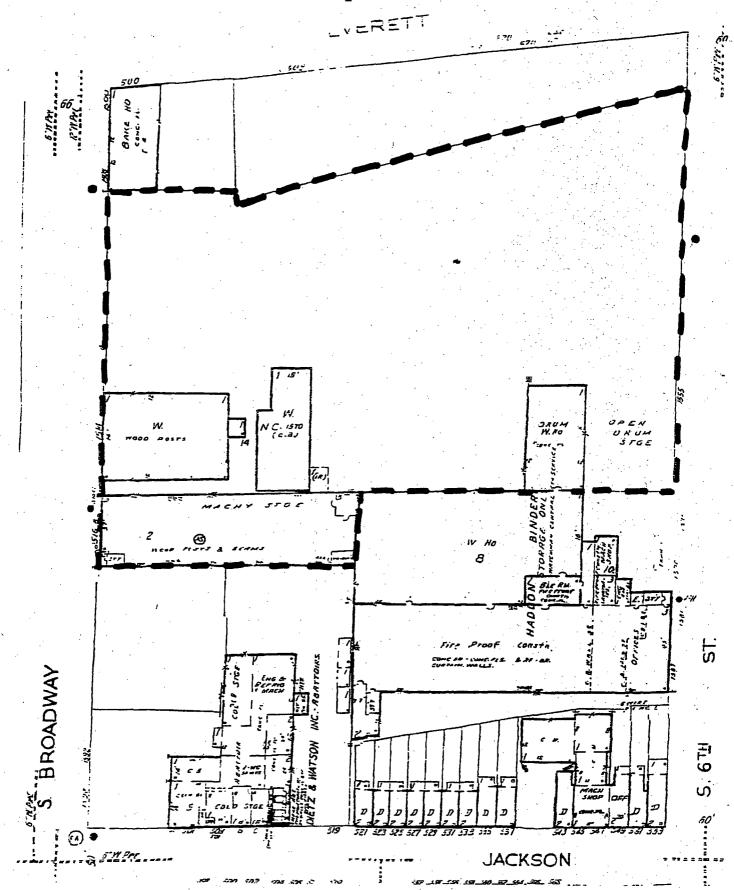




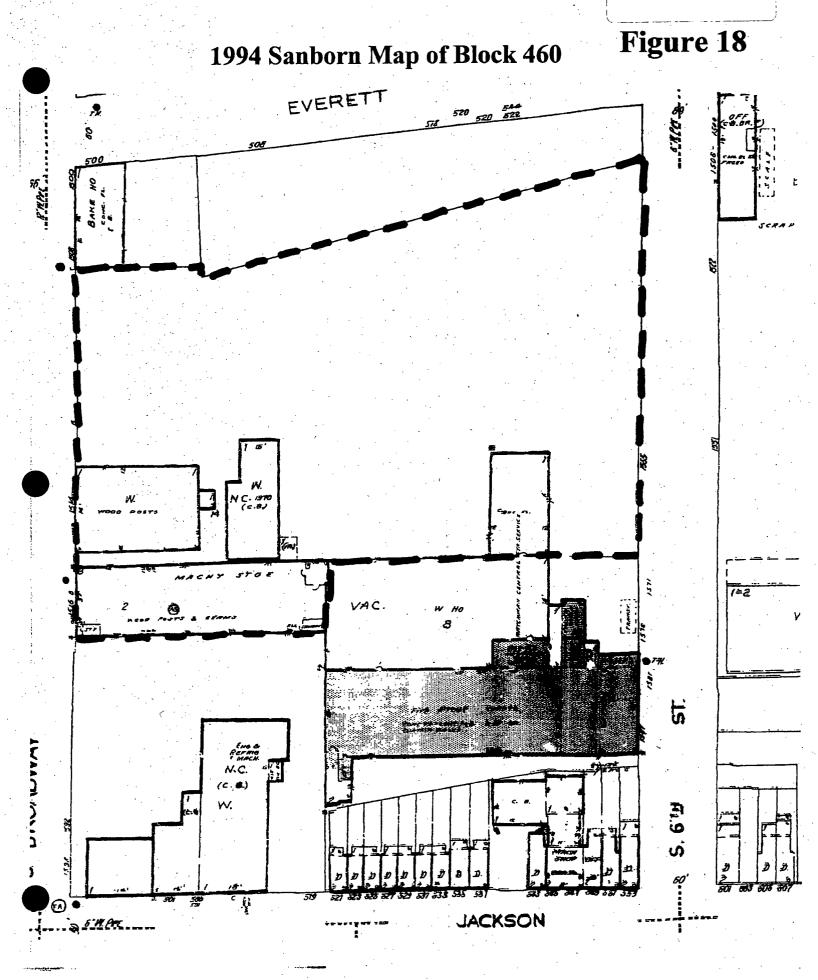


1982 Sanborn Map of Block 460

Figure 16



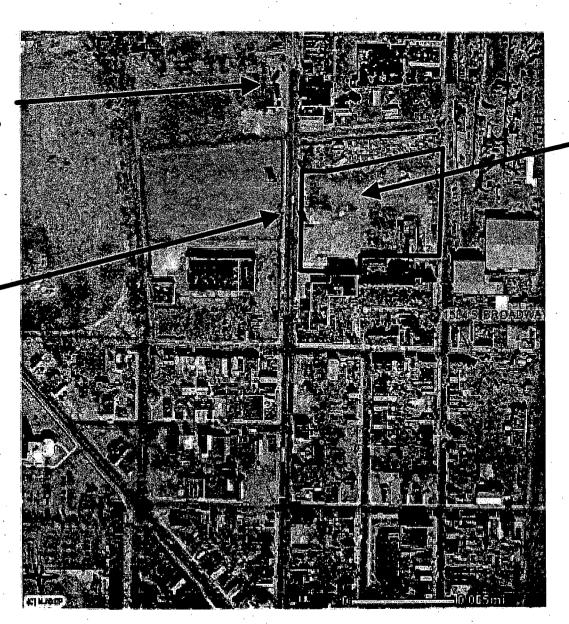




Location of Adjacent NJDEP Known Contaminated Sites (2001) (From NJDEP Website)

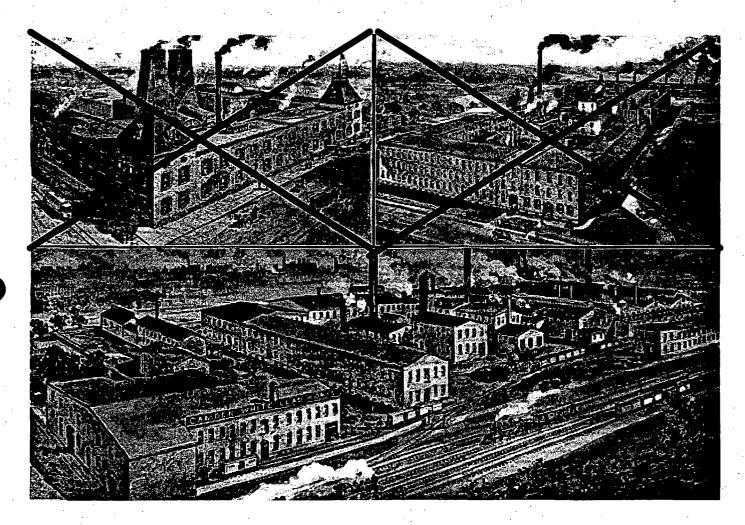
N.J. Dept. of Motor Vehicles

Liedtka Trucking



Martin Aaron
Site

King's Views of Philadelphia, Illustrated Monographs. Part 2. Published by Moses King, New York. Copyright 1900 by Moses King



N.Z. Graves & Co., And Camden White Lead Works Offices, 3d and Arch Sts., Philadelphia.

"Paints, varnishes and white lead. One of the largest establishments in these lines in America. Started in 1882, at 20th and Tasker Streets (upper left hand), now devoted to varnish and japan making. In 1887 the paint and color works, Broad and Geary Sts. (upper right hand) were built, and in 1899 the Camden White Lead Works, 6th and Jackson Sts. Combined area, 18 acres. Nelson Z. Graves, pres.; V.F. Graves, treas."

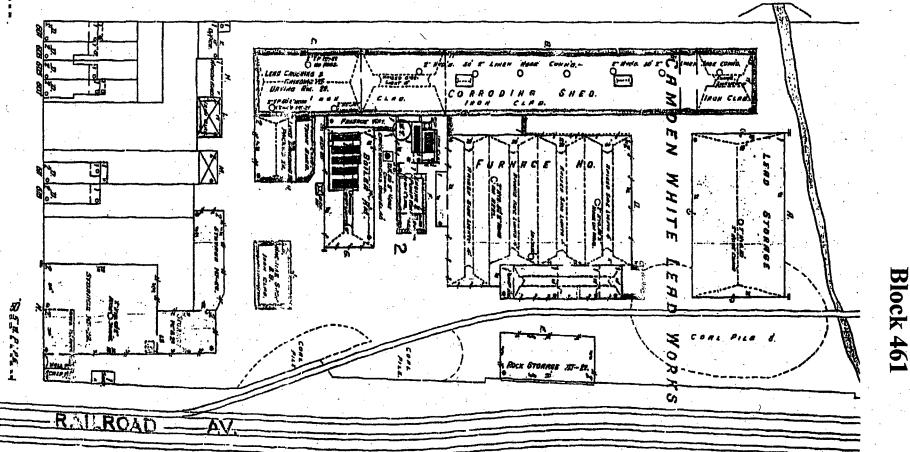
Source: http://www.brynmawr.edu/iconog/king/main2.html



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GASTLE KID CO.

TWO MIGHT NATUMEN, REMAINS CLOCK 9 STATIONS—
POREM AND NEST STAMM-FULL COME. — LINING SERVING,
GENERATED OF PRIMICES.— STATE ATLES.
THO STOTY NUMBERS OF THE MESER FUND LINING
HOSE COME TO G. OF THE LINING PROSE COMES AT PRESE
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34

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