

Project Name

Environmental Awareness Project for Major International Chemical Company

Client

O'Melveny & Meyers, New York

Services Provided

- Produced an Expert Report
- Provided Expert Testimony Which Addressed the Environmental Regulations Applicable to Solid Waste and Wastewater Disposal Activities

Project Description

The Chemical Company is situated on a 1,275-acre tract of land, of which 320 acres are developed, located in Ocean County, New Jersey. The facility manufactures organic dyes, pigment, and epoxy resins. Since manufacturing operations began in 1952, the facility disposed of wastes from manufacturing processes in on-site landfills, a sludge disposal site, four aeration lagoons, an oxidation basin, and a settling basin. The facility also disposed of thousands of drums of liquid chemicals and hazardous wastes on site. Groundwater contamination has resulted from unauthorized disposal activities conducted at the site.

Approach

An extensive review of federal and state solid waste regulations pertaining to operating procedures at the site was conducted. SAI investigated the facility's environmental regulation violations.

Review of the company's documentation revealed a pattern of systematic deception by company officials to regulators, local representatives, and the general public, with respect to the quality of wastewater, company operating procedures, as well as permit and solid waste regulation compliance. The company maintained that inert chemical wastes in sealed drums were the only category of waste being shipped to the landfill when in fact open drums of hazardous wastes were received, which ultimately impacted groundwater quality.

SAI established that a fairly sophisticated understanding of waste disposal practices and its impacts on both water quality and public health has existed since the beginning of the century. SAI then evaluated the actions of the company relative to the current regulations and state of knowledge and established that the company was aware that their activities were both illegal and unsound.

