123552

RECORD OF DECISION

American Cyanamid Superfund Site
Operable Unit 04

Bridgewater Township
Somerset County, New Jersey

United States Environmental Protection Agency
Region II
New York, New York

September 2012

DECLARATION STATEMENT

RECORD OF DECISION - OPERABLE UNIT 04

American Cyanamid Superfund Site

SITE NAME AND LOCATION

American Cyanamid Superfund Site
Bridgewater Township, Somerset County, New Jersey
EPA ID# NJD002173276
Operable Unit 04

STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected remedy for the American Cyanamid Superfund Site (Site), which was chosen in accordance with the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Part 300. This decision is based on the Administrative Record file for the Site. The attached index (see Appendix III) identifies the items that comprise the Administrative Record, upon which the selection of the remedial action is based.

The New Jersey Department of Environmental Protection (NJDEP) concurs with the selected remedy (see Appendix IV).

ASSESSMENT OF THE SITE

The response action selected in this Record of Decision (ROD) is necessary to protect the public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment.

DESCRIPTION OF THE SELECTED REMEDY

The remedy described in this document represents the fourth Operable Unit (OU) of the American Cyanamid Site. Due to the volume, complexity and nature of contamination at the Site, waste disposal areas (referred to as impoundments), Site-wide soils and groundwater were originally separated into seven phased or operable units. The Site-wide remedy for OU4 presented in this ROD also combines OU1 to OU5 and OU7 response actions. The Hill Property (OU6) was addressed in a July 1996 ROD and was deleted from the National Priorities List in December 1998. Impoundments 1 and 2 are being addressed separately under a recently created OU8. In March 2010, the Region II Office of the U.S. Environmental Protection Agency (EPA) discussed the proposed alternatives to remedy the Site with EPA's National Remedy Review Board (NRRB). The remedy described in this ROD was selected based upon NRRB input.

Materials meeting the definition of principal threat waste exist at the Site that could pose a potential risk from exposure if appropriate remedial actions are not implemented. Principal threat wastes are materials that include or contain hazardous substances, pollutants or contaminants that act as a reservoir for the migration of contamination to groundwater, surface water or air, or act as a source for direct exposure. In this OU4 ROD, materials that meet the definition of principal threat waste will be treated through solidification/stabilization (S/S) technologies to prevent the migration of contaminants.

The selected remedy for OU4 includes the following components:

- Waste material located within Impoundments 3, 4 and 5 will be entirely treated through in-situ S/S to prevent the migration of contaminants. An impermeable engineered vapor control barrier and an engineered soil cover system will be installed following solidification. The waste materials in these impoundments typically consist of tarry substances or high-hazard materials defined by EPA as principal threat waste.

  Site-wide soils that consist of tarry substances or principal threat wastes will require complete excavation and relocation to Impoundments 3, 4 and 5. Following relocation, these soils will be treated using in-situ S/S, along with the remaining materials in Impoundments 3, 4 and 5 as stated above.

  In-situ S/S reduces the mobility of principal threat waste by sequestering contaminants to restrict migration and reduce leaching to the groundwater. In addition to immobilizing contaminants in a solid matrix, in-situ S/S may also chemically convert certain contaminants into a less toxic form. Effective sequestering mixes would be needed to effectively treat principal threat wastes. Different in-situ

S/S mixes and methods may be required for different areas of the Site. Treatability testing would be conducted prior to full-scale implementation to optimize the in-situ S/S mix and demonstrate a correlation between leachability and unconfined compressive strength (UCS) and permeability performance criteria. Materials that are treated with in-situ S/S will be required to meet performance measures, such as minimum UCS, maximum permeability and leachability testing for Site-related constituents.

Prior to in-situ S/S of the contents in Impoundments 3, 4 and 5, the area would be cleared of vegetation and excavated for surface and subsurface debris removal (e.g., large boulders, tank pads, conduits and concrete), as these materials could interfere with the in-situ S/S process. In-situ S/S will be implemented for the full depth of the impoundment material prior to capping. The actual depth of treatment will be established and confirmed during the remedial design phase. The selection of mixing equipment would be determined during final design. Dust, vapor and noise management controls would be put in place to protect workers and the community during construction activities.

Since the selected remedy requires the transportation of materials to the Site, EPA will evaluate all transportation options, including the use of rail and trucks. A thorough review will be conducted to understand and consider the impacts to the community.

- For Site-wide soils that are determined to require vapor controls, an impermeable multi-layered engineered cap with a vapor mitigation system will be constructed. The engineered vapor control cap will reduce infiltration and the vapor mitigation system will capture and treat emissions. These soils typically contain volatile and semi-volatile organic compounds that have the potential to migrate into the atmosphere. All engineered caps will be designed and constructed to withstand the effects of a 500-year flood event. In addition, the engineered caps will be designed and constructed to protect against all Site-specific hazards which may pose a threat to their integrity, such as flooding, inadequate drainage, slope instability, erosion, freeze/thaw cycle effects, surface vegetation and any other risks associated with being located in a flood hazard area. An inspection and maintenance program for the engineered capping systems will be developed as part of the ongoing operation plan for the Site.

- For Site-wide soils determined to require a direct contact barrier, an engineered soil cover system will be utilized. Soils requiring this engineered cover typically consist of low-level contaminated soils containing hazardous substances at levels greater than NJDEP nonresidential direct contact soil remediation standards.

- An ecological risk assessment will be conducted for Impoundments 13, 17 and 24 to confirm the appropriate treatment for these materials. If the ecological risk assessment identifies any impoundment contents that present an unacceptable risk, these materials would be relocated and consolidated in the North Area in areas where the same types of controls are warranted. Any impoundment contents that do not present an unacceptable risk could remain in their current location. Any impoundment contents requiring excavation and relocation would be remediated to acceptable levels, such as NJDEP ecological soil screening criteria or ecologically protective benchmarks.

- The existing bedrock groundwater collection system will be improved by relocating the primary extraction wells to a more central location and by adding new extraction wells, as necessary, to ensure that all Site-related groundwater is captured. In addition, a recovery system (such as trenches, wells and/or containment walls) will be constructed for collection of overburden groundwater at several locations. The details of these improvements will be developed during the remedial design phase. These improvements will eliminate the migration of contaminants exceeding the more stringent of federal maximum contaminant levels (MCLs) and New Jersey groundwater quality standards (GWQS) in the overburden and bedrock aquifers beyond the point of compliance through a combination of source actions and hydraulic controls and, further, will restore the overburden and bedrock aquifers within the area of attainment to their expected beneficial use and to concentrations below the more stringent of federal MCLs and NJ GWQS within a reasonable period, as practicable. The waters collected at the Site will be discharged to surface water following complete on-site treatment. If it is determined that this treatment method is not appropriate or feasible, then collected groundwater will either be re-injected following complete on-site treatment or be discharged to the local sewerage authority directly or following pre-treatment.

- Institutional controls, monitoring and periodic reviews will also be required to ensure that the remedy remains protective of public health and the environment. The following institutional controls will be implemented as part of the remedy: deed restrictions, restrictive covenants and a groundwater Classification Exception Area/Well Restriction Area. Monitoring of the engineered capping systems, sediment, surface water and groundwater will be required as part of the ongoing operation plan at the Site. The details of the maintenance and monitoring requirements for the engineering controls will be determined in the design phase.

STATUTORY DETERMINATIONS

Part 1: Statutory Requirements
The selected remedy is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost-effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies to the maximum extent practicable.

Part 2: Statutory Preference for Treatment
This remedy also satisfies the statutory preference for treatment as a principal element of the remedy (i.e., reduces toxicity, mobility or volume of hazardous substances, pollutants or contaminants as a principal element through treatment).

Part 3: Five-Year Review Requirements
Because this remedy will result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within five years after initiation of remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

ROD DATA CERTIFICATION CHECKLIST

The ROD contains the remedy selection information noted below. More details may be found in the Administrative Record file supporting this ROD.

- Contaminants of concern and their respective concentrations may be found in the "Summary of Site Characteristics" section.

- Baseline risk represented by the contaminants of concern may be found in the "Summary of Site Risks" section.

- Cleanup levels established for contaminants of concern and the basis for these levels can be found in the "Remedial Action Objectives" section.

- Manner of addressing source materials constituting principal threats may be found in the "Principal Threat Wastes" section.

- Current and reasonably-anticipated future land use assumptions and current and potential future uses of groundwater considered in the baseline risk assessment and ROD can be found in the "Current and Potential Future Site and Resource Uses" section.

- Estimated capital, operation and maintenance (O&M) and total present worth costs, discount rate and the number of years over which the remedy cost estimates are projected can be found in the "Description of Alternatives" section.

- Key factors that led to the selection of the remedy may be found in the "Comparative Analysis of Alternatives" section.

AUTHORIZING SIGNATURE

Walter E. Mugdan, Director
Emergency and Remedial Response Division
U.S. EPA Region II

Sept. 27, 2012
Date

DECISION SUMMARY

American Cyanamid Superfund Site

Bridgewater Township
Somerset County, New Jersey

United States Environmental Protection Agency
Region II
New York, New York

September 2012

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ATTACHMENTS TO RESPONSIVENESS SUMMARY

SITE NAME, LOCATION AND DESCRIPTION

The American Cyanamid Superfund Site (Site), located in the central portion of New Jersey, is within the southeastern section of Bridgewater Township, Somerset County. It is bounded by Main Street to the north, the Raritan River to the west and south and Interstate 287 to the east, as shown in Figure 1.

The Site encompasses approximately 435 acres and was used for numerous chemical and pharmaceutical manufacturing operations over the past 90 years. The facility was originally built in 1915 as Calco Chemical Company to manufacture intermediate chemicals and dyes. The plant expanded over the following 60 years to become one of the nation's largest dye and organic chemical plants, resulting in the production of thousands of chemical products. The majority of the expansion at the plant occurred after American Cyanamid purchased the facility in 1929 and was driven by the large increase in demand for chemicals in the United States, particularly during and immediately after World War II. The large increase in manufacturing capacity during the period from 1930 through 1970 required more buildings, support services and disposal capabilities. As a result of past activities at the facility, a number of waste storage and disposal areas, referred to as "impoundments," were constructed. Due to these activities, the surrounding soils and groundwater were eventually adversely impacted. Throughout its more than 75-year manufacturing history, numerous organic and inorganic chemical raw materials were used at the facility to produce products including rubber chemicals, pharmaceuticals, dyes, pigments, chemical intermediates and petroleum-based products.

Previously, the Site was generally divided into two main portions, referred to as the Main Plant and the Flood Plain. The Main Plant area referred to the portion of the Site within a flood control berm, where manufacturing activities were historically conducted. The Flood Plain area referred to the portion of the Site outside of the flood control berm. These terms were derived when the facility was operational and failed to recognize that both of these areas lie within the flood hazard area of the Raritan River. For this ROD and future documents, the Site has been re-designated into five new areas for ease of understanding. As shown in Figure 2, the Site is now divided into the following five areas: North Area, South Area, West Area, East Area and the Impoundment 8 Facility. The North Area, which was referred to as the Main Plant area in previous documents, refers to that portion of the Site property within a flood control dike. The portion of the Site previously referred to as the Flood Plain area has been separated into the following three areas: West Area, South Area and East Area. The West Area refers to the portion of the Site bounded by the Somerset County Recycling Center to the north, the Raritan River to the west, the Port Reading rail line to the south and the flood control berm to the east. The South Area refers to the portion of the Site located west of Interstate-287 between the Port Reading rail line and the Raritan River. The East Area, which is the only portion of the Site located in the Borough of Bound Brook, refers to the small triangular portion of the Site located to the east of Interstate-287. The Impoundment 8 Facility, which is designated as a corrective action management unit (CAMU) under the Resource Conservation and Recovery Act (RCRA), is located to the northwest of the Site across Polhemus Lane. The entire Site lies within the flood hazard area of the Raritan River, with the exception of the Impoundment 8 Facility.

Approximately 50% of the North Area was used for production activities over the time the facility was active. Impoundments cover approximately 10 to 15% of the North Area. The remaining 35 to 40% was used for storage of general equipment, raw material and finished product, as well as incidental waste disposal. Approximately 80% of the West, South and East Areas contain impoundments. The remaining 20%, consisting of the East Area and portions of the South and West Areas, continues to be virtually undisturbed. A map of the Site can be found in Figure 2.

The Hill Property, which was formerly part of the Site, consists of 140 acres located northeast of the Site. The Hill Property was separated from the Site and included a research laboratory and administrative buildings. In December 1990 (amended March 1992), a Baseline Site-wide Endangerment Assessment (BEA) Report established that there are no current or future unacceptable risks to human health and the environment associated with the Hill Property. Based on this finding, no remedial action was required other than the implementation of a classification exception area (CEA) and a well restriction area (WRA) for the groundwater, shown on Figure 3.

In June 1999, all manufacturing ceased at the Site. By the end of November 2000, almost all buildings on-site were demolished.

In December 1994, American Home Products Corporation purchased the American Cyanamid Company. In March 2002, American Home Products Corporation changed its name to Wyeth. In October 2009, Wyeth was purchased by Pfizer Inc. and became a wholly owned subsidiary of Pfizer. Title to the Site property is held by Wyeth Holdings Corporation (Wyeth).

SITE HISTORY AND ENFORCEMENT ACTIVITIES

Preliminary investigations completed in 1981 verified that approximately one-half of the Site was utilized to support manufacturing, waste storage or waste disposal activities, and that contaminated source areas were confined primarily to the North Area and in the on-site waste storage areas (impoundments). Twenty-seven impoundments are believed to have been constructed for disposal purposes. Of the 27, 16 are being addressed under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) since they were used for storing by-products of rubber chemical production, dye production and coal tar distillation, as well as for disposal of general plant waste and demolition debris. These impoundments were originally estimated to contain 877,000 tons of waste material. Hence, these impoundments, along with identified areas of contaminated soils, are the primary focus of current remedial activities. Both media have been found to be sources of groundwater contamination. On September 8, 1983, the site was placed on the National Priorities List (NPL).

American Cyanamid entered into an Administrative Consent Order (ACO) with the N.J. Department of Environmental Protection (NJDEP) (referred to as the 1988 NJDEP ACO) in May 1988 to address the 16 impoundments, Site-wide contaminated soils and groundwater. In addition to the regulatory requirements established under the 1988 NJDEP ACO, a New Jersey Pollutant Discharge Elimination System/Discharge to Groundwater (NJPDES/DGW) permit was issued in 1987. This permit required American Cyanamid to conduct extensive groundwater monitoring on a quarterly basis and to continue pumping bedrock production wells, at a minimum rate of 650,000 gallons per day. This action was designed to capture groundwater contamination within the Site boundaries.

In May 1994, American Cyanamid and NJDEP executed an ACO Amendment (1994 NJDEP ACO Amendment) which incorporated the existing groundwater pumping and monitoring requirements of the NJPDES/DGW permit and included additional groundwater monitoring underlying the Impoundment 8 RCRA Facility.

The 16 impoundments being addressed under CERCLA have been identified using numbers, which include: Impoundments 1, 2, 3, 4, 5, 11, 13, 14, 15, 16, 17, 18, 19, 20, 24 and 26. Due to the volume, complexity and nature of contamination at the Site, all impacted and affected impoundments, Site-wide soils and groundwater were originally separated into seven Operable Units (OUs). A summary of the specific OUs and their status are as follows:

OU1 (Group I): Impoundments 11, 13, 19 and 24

A Corrective Measures Study/Feasibility Study (CMS/FS) was completed for the Group I Impoundments in 1992 and a Record of Decision (ROD) was signed in September 1993. The remedies for Impoundments 11 and 19 were completed in November 1997 and November 1995, respectively. The remedial activities for Impoundments 13 and 24 are being re-evaluated based upon the results of a remedy review report (Impoundment Remedy Appropriateness Evaluation, 2005) and a subsequent Comprehensive Site-wide Feasibility Study (FS) report (2012).

OU2 (Group II): Impoundments 15, 16, 17 and 18

The CMS/FS for Group II Impoundments was completed in November 1993 and a ROD was signed in July 1996. The remediation of Impoundment 18 was completed in April 1998. The remedy for Impoundments 15 and 16 was modified by NJDEP with an Explanation of Significant Differences (ESD) on November 30, 1998. The ESD selected an alternative remedy consisting of recycling of the material (iron oxide) within both impoundments. The recycling started in the spring of 2000 and is ongoing with an expected completion in 20 years. The remedial activities for Impoundment 17 are being re-evaluated based upon the results of a remedy review report (Impoundment Remedy Appropriateness Evaluation, 2005) and a subsequent 2012 Comprehensive Site-wide FS.

OU3 (Group III): Impoundments 1, 2, 3, 4, 5, 14, 20, 26

The CMS/FS for Group III Impoundments was completed in November 1997. A ROD followed in September 1998.

The remedial activities for Impoundments 1 and 2 were never initiated and eventually suspended in 2004. These impoundments are currently being re-evaluated as part of a separate study due to the nature of their contents and their complexity. After a brief pilot test confirmed that the selected 1998 remedy was technically infeasible and could not be performed as originally scoped, remediation of Impoundments 3, 4 and 5 was suspended in

2004 and is being re-evaluated based upon the results of a remedy review report (Impoundment Remedy Appropriateness Evaluation, 2005) and a subsequent Comprehensive Site-wide FS. Impoundments 14 and 20 were remediated under CERCLA pursuant to a 2007 ESD and completed in August 2010. Impoundment 26 was excavated, solidified with cement and placed in the Impoundment 8 Facility. Remediation of Impoundment 26 was completed under CERCLA in May 2002.

OU4: Site Soils

A 1992 Surface Soil Remedial/Removal Action Program was completed addressing specific areas of soil contamination that posed a potential risk to worker health and safety. The program addressed several soil areas contaminated with polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs) and chromium. The program included excavation and off-site disposal of PCB-contaminated soil, excavation and disposal of PAH-contaminated soil, capping of another PAH-contaminated area, as well as placement of a geotextile, soil and vegetative cover over a chromium-contaminated area. This program, along with plans for an OU4 Surface Soils ROD, was suspended in 2004, re-evaluated as part of the Comprehensive Site-wide FS and included as part of this ROD.

OU5: Site Groundwater

In accordance with the NJDEP ACO, a groundwater monitoring program was established and included Site-wide groundwater pumping and monitoring. To control groundwater contamination related to the Site, Wyeth operates bedrock production wells with pumping at a minimum rate of 650,000 gallons per day and monitors groundwater quality on a semi-annual basis. The groundwater monitoring program was re-evaluated as part of the Comprehensive Site-wide FS and is included as part of this ROD. A Site-wide CEA/WRA is currently being developed with NJDEP to restrict potable use of groundwater until groundwater has been restored and chemical-specific ARARs have been met.

OU6: Hill Property

The Hill Property was addressed in a July 1996 ROD. This ROD selected a remedy consisting of no further action with monitoring and institutional controls. As a part of the ROD, NJDEP established a CEA/WRA on the Hill property to maintain water use restrictions. The CEA/WRA was subsequently closed in June 2008 after residual groundwater contamination was recovered. The Hill Property has since been deleted from the NPL on December 29, 1998 and was redeveloped for commercial use (i.e., retail stores, a professional baseball stadium and a commuter/stadium parking lot).

OU7: Site-related Wetlands

A Baseline Ecological Risk Assessment (BERA) was completed in January 2005 and a Human Health Risk Assessment (HHRA) for the South and West Areas was completed in December 2006. Site-related wetlands were re-evaluated as part of Site-wide soils in the Site-wide FS.

Non-CERCLA Impoundments (RCRA)

Lagoons 6 and 7 and Impoundments 8, 9A and 25 either have been or are currently being addressed under RCRA. In May 1991, Impoundment 8 was developed into a RCRA Subtitle-C landfill, referred to as the Impoundment 8 Facility. The design included a triple liner, leachate detection and collection system and a groundwater monitoring system. As part of the 1998 OU3 ROD, Impoundment 8 was designated as a CAMU in accordance with RCRA regulations. The Impoundment 8 Facility accepts only Site-related materials defined under RCRA Subtitle C landfill requirements. The use of Lagoons 6 and 7 as Treatment/Storage/Disposal facilities under RCRA was discontinued in 1984. All of Lagoon 6 and approximately 95% of Lagoon 7 soils and silts have undergone remediation through excavation/solidification and were placed into the Impoundment 8 Facility. The remainder of the material in Lagoon 7 is in the process of being closed in accordance with RCRA closure plans. Impoundment 9A was closed in-place by installing a double synthetic liner capping system and Impoundment 25 was closed under RCRA in 1988.

Comprehensive Site-wide Feasibility Study

In Spring 2004, Wyeth submitted several documents to EPA and NJDEP seeking a suspension of remedial design and remedial action work on the OU3 remedy and proposed to reassess the entire Site through a Comprehensive Site-wide FS. In its proposal, Wyeth stated that the remedy selected for the OU3 impoundments could not be performed as intended based on technical infeasibility. The difficulties mentioned included the technical infeasibility of the selected remedy, the impracticability of containing air emissions within permissible levels, a schedule to complete the actions was estimated at 15 to 20 years and a major cost escalation of over 100% higher than the original estimate provided in the September 1998 ROD. Based on these issues and the belief that previous decisions may also benefit from a comprehensive review, Wyeth proposed to reassess the OU3 remedial action and the other ROD remedies; complete the remedial investigations (RIs)/studies for Site-wide soils, groundwater and wetlands; and evaluate potential future-use plans for the Site. All ongoing remedial activities at the Site (with the exception of other ongoing investigation and remediation activities associated with Impoundments 14, 15, 16 and 20 and the bedrock groundwater capture system) were suspended pending the completion of a remedy review report to evaluate the appropriateness of the remaining impoundment remedial programs. Based upon this report, referred to as the 2005 Impoundment Remedy Appropriateness Evaluation, it was recommended that a Comprehensive Site-wide FS be conducted. The objective of the Site-wide FS, completed in February 2012, was to develop and evaluate remedial alternatives in a comprehensive manner.

Impoundment 1 and 2 Focused Feasibility Study (FFS)

In 2009, both EPA and NJDEP agreed to separate Impoundments 1 and 2 from the Site-wide FS and Site-wide remedy decision. Due to the highly complex nature of the contaminants within Impoundments 1 and 2 and their proximity to the Raritan River, a FFS is currently being performed for these impoundments with its own specific remedy to follow.

Summary of Impoundment Status

Of the 16 impoundments addressed under CERCLA, Impoundments 3, 4, 5, 13, 17 and 24 were re-evaluated as part of the 2012 Comprehensive Site-wide FS. Impoundments 1 and 2 are being re-evaluated as part of an ongoing FFS due to their complexity, location and volume. Impoundments 15 and 16 are currently undergoing remediation. Impoundments 11, 14, 18, 19, 20 and 26 were remediated in accordance with CERCLA closure plans.

Impoundments 9, 10 and 12 were never used for waste disposal. Impoundment 21 was used to contain emergency fire water and Impoundments 22 and 23 were used to contain river silt from the facility’s former river water settling operation. Lagoon 6 and Impoundments 8, 9A and 25 were closed and classified as Treatment/Storage/Disposal facilities pursuant to regulations issued under RCRA. Lagoon 7 is in the process of being closed in accordance with RCRA closure plans.

Removal Action on Groundwater Discharges

In December 2010, Wyeth performed a Site-wide inspection of the facility to note any environmental-related concerns. As a result, Wyeth observed groundwater discharge (referred to as seeps) from the Site banks in the vicinity of Impoundments 1 and 2 into the Raritan River. After sampling was performed and preliminary laboratory analytical results were reported on January 6, 2011, it was determined that the seeps contained up to 20,000 parts per billion of benzene.

In February 2011, EPA and Wyeth developed an Interim Mitigation System plan to immediately address the seeps while a longer term solution could be discussed, planned and implemented. This plan required the installation of activated carbon-filled sand bags along the river at the seep discharge points.

For the long-term solution, Wyeth signed an Administrative Settlement Agreement and Order on Consent (AOC) with EPA on July 19, 2011 requiring the design and construction of a groundwater removal system to intercept and capture the releases of groundwater originating from the Site into the Raritan River. The groundwater capture system includes a collection trench, a containment wall and an interim groundwater treatment plant. This system was completed in May 2012 and is currently operating. The treated water is discharged to Cuckel's Brook (formerly referred to as Cuckhold's Brook) under a New Jersey Pollution Discharge Elimination System/Discharge to Surface Water (NJPDES/DSW) Permit Equivalency.

HIGHLIGHTS OF COMMUNITY PARTICIPATION

EPA has encouraged and received public involvement throughout the history of the Site. A Community Involvement Plan was established in 1988 by NJDEP and implemented for a series of RODs in the 1990s. An updated Community Involvement Plan was established in January 2011 to serve as a guide for Pfizer and EPA in sharing information and obtaining public input on the Site-wide remedy. In 1992, EPA awarded a technical assistant grant (TAG) to CRISIS, Inc. This grant provides funding for activities that help a community participate in decision making at eligible Superfund sites. Since that time, CRISIS has been the primary community-based group serving as liaison between the NJDEP, EPA and the community. CRISIS has consistently participated in monthly project calls and served in a technical review capacity on behalf of the community.

Documents such as RI reports, the Site-wide FS and both the Human Health and Ecological Risk Assessment reports, which describe the nature and extent of contamination, identify Site-related risks to public health and the environment and evaluate remedial alternatives to address the identified contamination were made available to the public in information repositories maintained at the Superfund Records Center in the EPA Region 2 offices at 290 Broadway, New York, New York, the NJDEP Office of Records at 401 East State Street, Trenton, New Jersey and the Bridgewater Township Library at 1 Vogt Drive, Bridgewater, New Jersey.

In addition, the Proposed Plan (see Attachment A of Appendix V), which identifies EPA's preferred remedy and the basis for that preference is also included in the repositories.

On February 16, 2012, a notice of the commencement of the public comment period was published in the Courier News, a local newspaper (see Attachment B of Appendix V). The notice also informed the public of a public meeting date (held on March 8, 2012), a description of EPA's preferred remedy and the availability of the above referenced documents. Due to several requests for additional time to review EPA's preferred remedy, the public comment period was extended from 45 days to 90 days, ending May 15, 2012.

As mentioned earlier, the public meeting was held to present EPA's preferred remedy and to solicit input from the public about the Site, the remedial alternatives and the proposed remedy. The meeting was well attended by local residents, local and regional stakeholders, business owners, government officials and members of the responsible party's project team and their consultants.

EPA has received written comments along with a number of oral comments from the public meeting. Responses to the comments are included in the Responsiveness Summary (see Appendix V). The transcript and written public comments are found in Attachment C and Attachment D of Appendix V, respectively.

SCOPE AND ROLE OF OPERABLE UNIT 04 REMEDY

Due to the volume, complexity and nature of contamination at the Site, impoundments, Site-wide soils and groundwater were originally separated into seven OUs:

- OU1: Impoundments 11, 13, 19 and 24
- OU2: Impoundments 15, 16, 17 and 18
- OU3: Impoundments 1, 2, 3, 4, 5, 14, 20 and 26
- OU4: Site Soils
- OU5: Site Groundwater
- OU6: Hill Property
- OU7: Site-related Wetlands

RODs have been signed for OU1 (9/28/93), OU2 (7/12/96), OU3 (9/28/98) and OU6 (7/12/96).

However, in June 2004, all ongoing remedial activities at the Site, with the exception of other ongoing investigation and remediation activities associated with Impoundments 14, 15, 16 and 20 and the bedrock groundwater capture system, were suspended pending the completion of a remedy review report to evaluate the appropriateness of the remaining impoundment remedial programs. Based upon this report, referred to as the 2005 Impoundment Remedy Appropriateness Evaluation, it was recommended that a Comprehensive Site-wide FS be conducted.

Wyeth undertook completion of a Comprehensive Site-wide FS designed to address all remaining contamination within the various media on-site through a single comprehensive program.

The remedy presented in this ROD combines all remaining active OUs (OU1-OU5, OU 7) and is now being addressed under the existing OU4, which is referred to as the Site-wide remedy. Impoundments 3, 4, 5, 13, 17 and 24, as well as Site-wide soils and groundwater are being addressed as part of the Site-wide remedy under OU4. As mentioned earlier, Impoundments 1 and 2 are being addressed separately under a recently created OU8 due to their complexity and volume.

The groundwater seeps into the Raritan River in the vicinity of Impoundments 1 and 2 are currently being addressed through a Removal Action and will be incorporated into the Site-wide remedy under OU4.

SUMMARY OF SITE CHARACTERISTICS

Overview

The area surrounding the Site is an urban mixture of industrial and residential uses. The 435-acre Site (currently zoned for industrial use) is fenced and covered with a mixture of vegetation and asphalt patches. About 100 acres of the Site are comprised of waste disposal areas and the remainder of the Site consists of soils and wetland areas.

The Site is generally bounded by NJ Transit and Main Street to the north, the Raritan River to the west and south and Interstate 287 to the east. In addition, a small parcel of land is situated between the Conrail freight rail line and the Raritan River in the Borough of Bound Brook. There are several commercial and industrial properties neighboring the Site, such as a tire manufacturing company, a local sewerage authority, a public water utility, a professional baseball stadium and an adult daycare center.

For the most part, the surrounding community is serviced by a public water supply, which is not connected to the contaminated groundwater beneath the Site. Private wells are utilized by some residents as a potable water supply in the communities of Franklin Township and South Bound Brook, which are located south of the Raritan River.

Geology and Hydrology

Geology

The Site is situated in the New Jersey Piedmont geomorphologic province, which is an area of rolling, low-lying terrain interrupted only by the Watchung Mountains, about 1.5 miles to the north. Overall, the Site is generally flat, with a natural slope to the south-southeast toward the Raritan River. The following paragraphs discuss the generalized stratigraphy of the Site.

Surface geology

The natural soils of the Site are a mixture of sand, silt and clay (loam). Man-made fill/general solid wastes and disturbed soil and gravel also exist at ground surface in portions of the Site.

Geology of unconsolidated deposits

The general area of and around the Site is covered by naturally occurring unconsolidated sediments ranging in thickness from 5 to 30 feet. These sediments are either the weathering product (residual soils) of the underlying bedrock or they are fluvial deposits related to the adjacent Raritan River.

The unconsolidated deposits are composed of a silt and clay sequence, a sand and gravel sequence and a weathered shale layer. The silt and clay sequence acts as a hydraulic barrier, which can prevent the vertical migration of groundwater due to its low permeability. The sand and gravel sequence underlies the silt and clay sequence, but it also penetrates upwards into the silt and clay sequence in some locations. The weathered shale layer underlies the sand and gravel sequence. The weathered shale layer was created by weathering of bedrock and consists of shale and siltstone fragments in a clay matrix. This layer acts as a low permeability boundary between the overlying deposits and the underlying bedrock. When viewing the overburden deposits from a Site-wide perspective, it can be seen that the entire sequence of overburden deposits (silt and clay, sand and gravel and residual soil) tend to be present across the Site, although the silt and clay layer is not continuous across the Site.

Bedrock geology

The unconsolidated deposits are underlain by bedrock. This bedrock layer is part of the Passaic Formation, which consists of a series of reddish-brown shale, siltstone and fine-grained sandstone units. The bedrock contains highly fractured zones which allow vertical groundwater flow. The bedrock contains discrete bedding plane fractures which allow horizontal groundwater flow. These bedrock fractures control the composition and distribution of the overlying water-bearing units and the groundwater flow regime in the overburden aquifer system.

Hydrogeology

A principal objective for understanding the Site hydrogeology is to understand the potential for movement of Site contaminants from source areas. The chemistry data and interpreted distribution of key marker compounds indicates that there are a few reasonably well-defined areas of contamination in overburden groundwater as opposed to one or more gradational plumes. This distribution is likely caused by the generally downward hydraulic gradients between the overburden and the bedrock, which is significantly influenced by the pumping of the bedrock extraction wells (PW-2 and PW-3). The overall transport of overburden impacts is horizontal, likely within the sand and gravel unit at the base of the overburden, until a hydraulic connection is made between overburden and bedrock. Across most of the North Area, impacts are further transported in the bedrock co-located with structural bedding plains and migrate within the overall capture of the groundwater collection system.

Impoundments, Site-wide Soils and Groundwater Characteristics

Based on information provided in previous studies and reports, Site areas of concern include: impoundment contents, North Area soils, South Area soils, West Area soils and impacted groundwater.

Impoundment Contents

The locations of the impoundments are shown on Figure 2. Out of the 27 impoundments constructed for waste storage or disposal, 16 were determined to potentially contribute to groundwater contamination and threaten human health and the environment. For a more comprehensive description and the current status of the impoundments, see Tables 1A-1F. These 16 impoundments are separated into previously remediated impoundments and remaining impoundments and are discussed as follows:

Previously Remediated Impoundments

Numerous impoundments have been remediated or partially remediated. The total area remediated (Lagoons 6 and 7; Impoundments 8 and 9A; Impoundments 11, 14, 18, 19, 20, 25 and 26; and portions of Impoundments 1, 2, 4 and 5) is approximately 79.8 acres, with an approximate volume of 1,089,100 cubic yards (CY) of waste material addressed. Of this amount, approximately 50,000 CY consisted of the highly mobile and toxic material from Impoundments 1, 2, 4 and 5. This material, which was considered to meet the definition of principal threat wastes (as defined by EPA under CERCLA), was treated off-site for energy recovery. Tables 1A-1F also provide the areas and volumes remediated by impoundment.

Impoundments 15 and 16 are currently undergoing remediation albeit on a slower pace. The ongoing remedy for these impoundments is considered appropriate and consists of recycling/reuse of iron oxide. Therefore, Impoundment 15 and 16 are not included as part of this Site-wide remedy.

Remaining Impoundments

The total area of the impoundments yet to be remediated (Impoundments 1, 2, 3, 4, 5, 13, 17 and 24) is approximately 27.7 acres, with an approximate volume of 387,700 CY. As previously stated, Tables 1A-1F show the contaminants of concern (COCs) per impoundment. As previously noted, Impoundments 1 and 2 are being addressed separately under OU8.

Based on historical analytical data and information provided in previous studies and reports, the waste material in the remaining impoundments will generally require some form of control to eliminate direct contact exposures and migration to groundwater. Two additional exposure routes, inhalation or ingestion of dust or vapors and physical movement of the materials beyond their location and subsequent contact with receptors, must also be addressed.

Site-wide Soils

The term “Site-wide soils” constitutes media that do not include impoundment contents or groundwater. The estimated total area of impacted surface and subsurface soils being addressed is approximately 284 acres; 194 acres in the North Area and 90 acres in the South and West Areas, with a total volume of approximately 3,339,000 CY. The East Area is a 10-acre parcel of land located east of I-287 in Bound Brook, NJ. These areas are discussed in further detail below.

North Area Soils

Approximately 50% of the North Area was used for active manufacturing and production operations. The remainder of the North Area was used for waste disposal, as well as for equipment and material storage. Soil impacts within the North Area are widespread and include volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and inorganics with no discernable patterns or distinct areas of specific contamination.

South and West Area Soils

Historical records indicate that manufacturing activities were never conducted within the South or West Areas. Disposal of wastes was limited to Impoundments 1, 2, 13, 15, 16, 17, 18, 24 and the former drying bed area. It is suspected that the impacted soils in the South and West Areas are likely the result of incidental contamination, since they also have no discernible or specific sources.

East Area Soils

Historical records, aerial photographs and sampling efforts indicate that manufacturing and waste disposal activities were not conducted in the East Area.

Groundwater

For the past 60 years, production operations at the Site withdrew water from the on-site bedrock production wells for use as noncontact cooling water. The 1982 and 1988 NJDEP ACOs (as amended in 1994), require the current average withdrawal of over 650,000 gallons per day which results in groundwater flow inward from the perimeter of the Site toward the pumping wells. This system contains the existing groundwater contamination within the North Area of the Site. Recovered groundwater is discharged to the adjacent Somerset-Raritan Valley Sewerage Authority (SRVSA) wastewater facility for subsequent treatment and eventual release into Cuckel's Brook.

Site groundwater quality is currently monitored as part of a semi-annual monitoring program. Historical data is generally clustered around the impoundments, because this is where much of the past work at the Site was focused. In November 2005, as part of the groundwater RI, a Site-wide round of groundwater samples was collected with the objective of obtaining a Site-wide understanding of groundwater quality conditions. The results of this sampling effort indicated that VOCs, SVOCs, metals were present above state and federal standards in both the overburden and bedrock aquifers.

As noted above, the bedrock groundwater recovery system hydraulically controls bedrock groundwater in the North Area. Bedrock groundwater in the South and West Areas is not hydraulically controlled by the pumping of the production wells and eventually discharges to the Raritan River. Overburden groundwater in the vicinity of the bedrock groundwater recovery system migrates vertically due to induced hydraulic gradients, while overburden groundwater migrates horizontally due to natural hydraulic gradients near Cuckel's Brook and the Raritan River. Groundwater elevation contour maps for the overburden and bedrock aquifers are shown in Figures 4 and 5, respectively.

Investigation Summary

The impoundments and contaminated soils have been the primary focus of the Site remedial activities since they have been found to be the contributing sources of groundwater contamination. An Impoundment Characterization Program was completed in 1990, which was intended to fulfill the requirements of an RI for the impoundments. A soils RI was completed in May 1992 to characterize and delineate contaminated soils. Subsequent to the Impoundment Characterization Program, three CMS/FS reports were completed for the three impoundment groups between 1992 and 1997. RODs were issued for these impoundment groups consistent with the remedial alternatives recommended in the CMS/FS reports and remedial actions were completed in accordance with their respective RODs for Impoundments 11, 14, 18, 19, 20 and 26.

All remedial activities were suspended in 2004 pending the completion of a remedy review report, with the exception of other ongoing investigation and remediation activities associated with Impoundments 14, 15, 16, 20 and continued bedrock groundwater extraction and treatment. The remedy review report, known as the Impoundment Remedy Appropriateness Evaluation (July 2005) concluded that the remedies selected for Impoundments 1, 2, 3, 4, 5, 13, 17 and 24 were inappropriate, as previously discussed.

In 2005, a Data Adequacy Review (DAR) was completed to assess the adequacy of existing soil and groundwater data assembled through previous investigatory and monitoring programs at the Site. The DAR Report concluded that there was sufficient existing data related to Site soils and impoundment materials, but additional groundwater data was necessary to adequately characterize groundwater for the evaluation of remedial alternatives. Following the completion of a groundwater RI report in February 2006, NJDEP requested that additional monitoring wells be installed and additional data be collected. In February 2008, a supplemental groundwater RI report was issued by Wyeth and approved by NJDEP. The Report concluded that sufficient groundwater data existed for the completion of the Comprehensive Site-wide FS.

NATURE AND EXTENT OF CONTAMINATION

Impoundment Contents

Of the six impoundments (3, 4, 5, 13, 17 and 24) addressed in this ROD, there are two general types of impoundments being addressed:

- Those used to dispose mainly process wastes.
- Those used to dispose wastewater sludge.

Impoundments 3, 4 and 5 were used for mainly process waste disposal, and Impoundments 13, 17 and 24 were used for disposal of wastewater sludge. Impoundments 3, 4, 5, 13, 17 and 24 contain elevated levels of VOCs, such as benzene, chlorobenzene, toluene and xylene. VOCs contained in impoundments may be released to the atmosphere through volatilization from impoundment solids or impoundment water covers. These six impoundments have also been found to contain SVOCs, such as naphthalene, 2-methylnaphthalene, nitrobenzene, n-Nitrosodiphenylamine and 1,2-dichlorobenzene, as well as inorganics, such as antimony, arsenic, barium, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver and vanadium. In general, the concentrations of VOCs and SVOCs in Impoundments 3, 4 and 5 are significantly higher than in Impoundments 13, 17 and 24. Table 2A presents the COCs for the impoundments addressed in this ROD, as well as their mean, minimum and maximum concentrations for each impoundment. The information in this table is based upon the data contained in the Impoundment Characterization Program Report (1990), as well as additional information obtained since 1990.

The physical characteristics of the impoundments do not allow for the contents of these impoundments to be transported by surface water runoff, thus significant overland transport of the chemicals of interest with stormwater runoff does not occur. VOCs, SVOCs and inorganics have also been found in soils, as well as both the overburden and bedrock groundwater aquifers.

Site-wide Soils

As mentioned earlier, past leaks and spills have generally impacted soils in the eastern portion of the North Area, as well as some soil areas in the western portion of the North Area. Site-wide soils in the North Area contain VOCs, SVOCs and inorganics. North Area soils contain elevated levels of VOCs, such as benzene, chlorobenzene, toluene and xylene; SVOCs, such as naphthalene, nitrobenzene, benzo(a)anthracene, 1,2-dichlorobenzene and Total PCBs; and inorganics, such as antimony, arsenic, chromium, cobalt, cyanide and mercury. Table 2B presents the COCs for North Area soils, as well as the frequency of their detection and the mean, minimum and maximum concentrations for each COC.

As discussed previously, it is suspected that the impacted soils in the South and West Areas are likely the result of incidental contamination, since they also have no discernible or specific sources. Site-wide soils in the South and West Areas contain VOCs, SVOCs and inorganics. South and West Area soils contain elevated levels of VOCs, such as benzene, chlorobenzene, toluene and xylene; SVOCs, such as naphthalene, nitrobenzene, n-Nitrosodiphenylamine and 1,2-dichlorobenzene; and inorganics, such as chromium, lead and mercury. Table 2C present the COCs for South and West Area soils, as well as the frequency of their detection and the mean, minimum and maximum concentrations for each COC.

Chemical migration from both impoundments and soils to the groundwater is a primary transport mechanism at the Site. Dust generation, volatilization and surface water runoff are considered secondary transport mechanisms at the Site. Chemicals such as PAHs, PCBs or most heavy metals have an affinity to bind to material with high organic carbon content such as certain types of soil or sediment. Substances retained in soils are exposed to additional transport mechanisms. These include overland transport with stormwater runoff, atmospheric transport with dusts, biodegradation and bioaccumulation in soil biota.

Groundwater

Organic and inorganic chemical contaminants detected above New Jersey groundwater quality standards (GWQS) are present in North Area bedrock groundwater, as well as South and West Area bedrock groundwater. As indicated earlier, impoundments and Site-wide soils act as the potential sources of contamination to groundwater.

North Area bedrock groundwater is captured by the bedrock groundwater recovery system and, therefore, is controlled and limits off-site migration. Bedrock groundwater in the South and West Areas is outside the zone of influence of the bedrock groundwater extraction system. Therefore, bedrock groundwater in the South and West Areas is not captured by the pumping wells and eventually discharges to the Raritan River. Contaminants present in the bedrock groundwater in these areas also discharge to the Raritan River. While bedrock groundwater concentrations in the South and West Areas are found above NJ GWQS, concentrations in these areas are generally lower than those detected in overburden groundwater. The highest bedrock groundwater concentrations in the South and West Areas are generally found in the vicinity of Impoundments 1 and 2. An evaluation was conducted to assess the potential for bedrock groundwater to flow south of the Raritan River into the communities of Franklin Township and South Bound Brook. Based upon both regional and local groundwater characteristics, this evaluation concluded that a complete pathway does not exist for the transport of Site-related contaminants beyond the Raritan River to the south.

Under natural conditions, overburden groundwater at the Site flows toward the Raritan River and its tributaries; however, previous and current data indicates that overburden groundwater over most of the Site, particularly in the North Area, migrates vertically into the bedrock aquifer as a result of the bedrock pumping system.

The majority of North Area overburden groundwater migrates vertically into the bedrock aquifer due to induced hydraulic gradients and is eventually captured by the bedrock groundwater system. This capture is strongest in the northern portion of the North Area and weakens to the south. The bedrock groundwater extraction system has resulted in local areas with lower water table surface elevations, referred to as depressions, which indicate that groundwater flows downward into the bedrock aquifer at these locations. The bedrock system has also resulted in areas with elevated water table levels, referred to as mounds, specifically located in the northern and southern parts of the Site. The water table mounding directly influences the overburden groundwater by generating a flow gradient towards the depressions thereby extending the overall capture of overburden groundwater by the bedrock extraction wells. Any contaminants present in North Area overburden groundwater, therefore, tend to be drawn down into the bedrock aquifer and are eventually captured by the bedrock extraction system. Although portions of overburden groundwater in the North Area are not captured by the bedrock pumping system and discharge to Cuckel’s Brook, the results of the overburden groundwater investigation in the North Area indicated no significant impacts to Cuckel’s Brook.

Overburden groundwater in the South and West Areas is not captured by the bedrock pumping system and eventually discharges to the Raritan River. As discussed later on, the 2005 BERA evaluated the potential exposures to surface water and sediment in Cuckel’s Brook and the Raritan River and concluded that the level of potential significant impact of Site-related COCs on ecological receptors is likely to be low. As discussed previously, the groundwater in the vicinity of Impoundments 1 and 2 is currently being addressed as part of the Removal Action and will be incorporated as part of the Site-wide remedy.

In both the overburden and bedrock aquifers, the most frequently found VOCs above NJ GWQS and federal maximum contaminant levels (MCLs) are benzene, chlorobenzene, toluene and xylene. The most commonly found SVOCs above the GWQS or MCLs are 1,2-dichlorobenzene and 1,4-dichlorobenzene. In both the overburden and bedrock aquifers, inorganic contaminants found at concentrations above either the GWQS or MCLs included manganese, iron and arsenic. Other inorganic contaminants were occasionally found above the standards, although these were typically at concentrations close to the GWQS. Tables 2D and 2E present the COCs for overburden and bedrock groundwater, as well as the frequency of their detection and the mean, minimum and maximum concentrations for each COC.

CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES

The title to the American Cyanamid Site property is held by Wyeth Holdings Corporation, a wholly owned subsidiary of Pfizer, Inc. The Site property lies within the M-2 General Manufacturing Zone. The current owner has discussed a number of potential future uses for portions of the Site, ranging from light industrial use to recreational use. The reuse of any portion of the Site will require approval from EPA. Institutional controls will be implemented to ensure the protectiveness of the remedy and its compatibility with future reuse.

The surrounding community located north of the Raritan River is serviced by a public water supply that is not connected to the contaminated groundwater beneath the Site. Private wells are utilized by some residents as a potable water supply in the communities of Franklin Township and South Bound Brook, which are located south of the Raritan River. An evaluation was conducted to assess the potential for groundwater to flow south of the Raritan River into these communities. Based upon both regional and local groundwater characteristics, this evaluation concluded that a complete pathway does not exist for the transport of Site-related contaminants beyond the Raritan River to the south. Groundwater is designated by the State as a Class IIA aquifer which requires it to be considered as a future potable water supply. Therefore, source control and eventual restoration of groundwater quality are important objectives of the selected remedy.

SUMMARY OF SITE RISKS

Baseline Risk Assessment

As part of the Site investigation process, a baseline risk assessment was conducted to determine the current and future effects of contaminants on human health and the environment.

A baseline risk assessment is an analysis of the potential adverse human health and ecological effects of releases of hazardous substances from a Site in the absence of any actions or controls to mitigate such releases, under current and future land, groundwater, surface water and sediment uses. It provides the basis for taking action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action.

Human Health Risk Assessment (HHRA)

The potential noncarcinogenic hazards and carcinogenic risks associated with potential exposures to the impoundments, surface soil and groundwater were evaluated in the BEA (BB&L, 1992) for the North Area and the HHRA (O'Brien & Gere, 2006) for the South and West Areas. The 1992 BEA and the 2006 HHRA were approved by NJDEP. EPA Region 2 prepared a streamlined HHRA in February, 2010 which evaluated additional pathways.

The objective of the streamlined HHRA was to determine the cancer risks and noncancer hazards associated with exposure to contaminated surface soil (North Area), groundwater (overburden and bedrock) and the impoundments. Since the current zoning of the Site is industrial, the streamlined HHRA evaluated the Site worker's exposure to surface soil and the impoundments, as well as the trespasser's exposure to surface soil. The groundwater is a designated potable water supply; therefore, the residential exposure pathway was also evaluated.

The maximum detected concentrations in each medium were compared to their respective regional screening level (RSLs). The surface soil RSLs are based on a worker's direct exposure (via ingestion, inhalation and dermal contact) while working at the Site (25 years). Since the groundwater at the Site is classified by NJDEP as a potable water supply, the RSLs represent a resident's exposure to groundwater contamination over the time reasonably expected for a resident to live in an area.

Tables 3A-3C provide a summary of the COCs and medium-specific exposure point concentrations for impoundments, North Area soils and both overburden and bedrock groundwater. Tables 4A-4D show the RSLs for impoundments, North Area soils and groundwater. Tables 5A-5C and Tables 6A-6C provide a summary of the noncarcinogenic and carcinogenic risk characterization for impoundments, North Area soils and groundwater.

In general, the industrial worker's exposure to the impoundments exceeded EPA's acceptable risk range of 10^{-4} to 10^{-6} and NJDEP's acceptable cancer risk level of 10^{-6}, as well as the noncancer hazard threshold of 1. The streamlined HHRA indicates that the total noncarcinogenic risk for the commercial/industrial worker's exposure to impoundments contents is between 1.3 and 280 with nitrobenzene as the primary risk driver. The total carcinogenic risk for an industrial/commercial worker's exposure to impoundment contents varied from 1.5×10^{-5} to 1.3×10^{-2} with benzene, naphthalene and n-Nitrosodiphenylamine as the primary risk drivers. It should be noted that the risks and hazards for this receptor's exposure to the impoundments are underestimated since a limited number of chemicals were included in the risk calculation. Due to the high concentrations of several contaminants, other Site-related contaminants may not have been detected due to high method detection limits. Therefore, the risk drivers are not limited to only the contaminants listed above. However, it should be noted that any other risk drivers at the Site are co-located with the risk drivers identified in the risk calculations.

For exposure to North Area surface soil, the acceptable risk range and the noncancer hazard threshold of 1 were exceeded for both the industrial worker and the trespasser. The total noncarcinogenic hazard index for the commercial/industrial worker's exposure to North Area surface soils is 170, with antimony and cobalt as the primary risk drivers. The total noncarcinogenic hazard index for the trespasser's exposure to North Area surface soils is 1000, with cobalt, chromium VI and antimony as the primary risk drivers. The total carcinogenic risk is 3.2×10^{-3} for the commercial/industrial worker's exposure to surface soils and the primary risk drivers are chromium VI, Total PCBs, benzo(a)anthracene, benzo(a)pyrene and arsenic. The total carcinogenic risk for the trespasser's exposure to North Area surface soils is 3.7×10^{-4} with Total PCBs, benzo(a)anthracene and benzo(a)pyrene as the primary risk drivers.

The cancer risks and noncancer hazards associated with a resident's exposure to groundwater exceeded the acceptable risk range and the noncancer threshold of 1. The streamlined HHRA indicates that the hazard index for a resident's exposure to bedrock groundwater is 14, while the hazard index for a resident's exposure to overburden groundwater is 160. The primary risk drivers in bedrock groundwater are 1,2,4-trichlorobenzene and chlorobenzene, while the primary risk drivers in overburden groundwater are aniline and chlorobenzene. The total carcinogenic risk for a resident's exposure to bedrock groundwater is $1.1x10^{-3}$, while the total carcinogenic risk for a resident's exposure to overburden groundwater is $1.0x10^{-2}$. The primary risk drivers in the bedrock groundwater are benzene, tetrachloroethylene, nitrobenzene, arsenic, benzo(a)pyrene and 1,4-dichlorobenzene. The primary risk drivers in the overburden groundwater are naphthalene, benzene, arsenic, 1,2-dichlorobenzene, 1,4-dichlorobenzene, chloroform, nitrobenzene and tetrachloroethylene.

It should be noted that other media (sediment and surface water) were not evaluated as part of the streamlined HHRA, which could underestimate the cancer risks and noncancer hazards. Overall, the streamlined risk assessment indicates that exposure to Site-related contamination results in an excess lifetime cancer risk that exceeds EPA's target risk range of 10^{-4} to 10^{-6}, as well as NJDEP's acceptable cancer risk level of 10^{-6}. Therefore, Site-related contamination poses an unacceptable human health risk to current and potential future receptors.

Ecological Risk Assessments

Ecological risks at the Site were addressed in two documents: the BEA approved by NJDEP and EPA in 1992 and the BERA in 2005. The Qualitative Ecological Assessment section of the BEA included the results of a Site-wide habitat survey, evidence from direct field observations and a Natural Heritage Data Base (NJDEP, 1991) search. The BEA indicated that the on-site habitat does not support threatened or endangered species. The BERA identified potential risks to ecological receptors from exposure to soils in an isolated portion of the West Area and from exposure to sediment and surface water in Cuckel's Brook. Potential risks to ecological receptors from exposure to Raritan River sediment and/or surface water were low. Groundwater discharge mass loading calculations suggest that exposure to concentrations of Site chemicals of interest resulting from overburden groundwater discharge is unlikely to affect the health and diversity of aquatic biota in the Raritan River.

Because the ecological risk associated with locations outside of the North Area had not been previously studied, the 2005 BERA evaluated the potential exposures for soils in the South and West Areas, as well as surface water and sediment in Cuckel's Brook and the Raritan River. Although tissue concentrations of contaminants in small mammals, invertebrates and vegetation were similar to those detected in reference samples, modeling indicated potential risk to some receptors from exposure to contaminants, primarily metals, in soils in an isolated cattail bank area of the West Area. Sediment toxicity was observed throughout Cuckel's Brook, impaired benthic communities were identified throughout the brook and concentrations of some metals were slightly above screening criteria in fish tissue. Due to the limited areal extent of contamination in the West Area and the physical limitations to habitat use in Cuckel's Brook, the BERA concluded that the level of potential significant impact of Site-related COCs on ecological receptors is likely to be low.

Impoundments 13, 17 and 24 were not included in either the 1992 BEA or the 2005 BERA because the contents of these impoundments were scheduled to be remediated under the OU1 and OU2 RODs. These impoundments will be the subject of an ecological risk assessment performed during the remedial design. As stated previously, the conclusions of this ecological risk assessment will influence how the contents of Impoundments 13, 17 and 24 will be addressed during the remedial action.

Conclusion

Based upon the results of the risk assessments conducted to date, EPA has determined that actual or threatened releases of hazardous substances from the Site, if not addressed by the preferred alternative or one of the other active measures considered, may present a current or potential threat to human health and the environment.

REMEDIAL ACTION OBJECTIVES

The following remedial action objectives (RAOs) address the human health risks and environmental concerns at the American Cyanamid Site. The RAOs are organized into three categories: principal threat waste, soil/impoundment material and groundwater.

Principal Threat Waste:

- Remove or treat material that meets the definition of principal threat waste, to the extent practical, and
- Prevent current or potential future migration of material that meets the definition of principal threat waste from the Site that would result in direct contact or inhalation exposure, to the extent practicable.

Soil/Impoundment Material:

- Prevent or minimize human and ecological exposure to contaminants in soils and impoundment materials at levels above relevant risk-based remediation criteria, and
- Prevent or minimize sources of groundwater impacts (*i.e.,* reduce chemical loadings to groundwater) resulting in long-term improvement of groundwater quality and eventual achievement of applicable regulatory standards.

Groundwater:

- Restore, as practicable, the overburden and bedrock aquifers within the area of attainment to its expected beneficial use and to concentrations below the more stringent of federal MCLs and NJ GWQS within a reasonable period, and
- Eliminate the migration of contaminants exceeding the more stringent of federal MCLs and NJ GWQS in the overburden and bedrock aquifers beyond the point of compliance through a combination of source actions and hydraulic controls to the extent practicable.

Note: Consistent with EPA Guidance (OSWER Directive 9283.1-2), the area of attainment includes the entire contaminant plume and the point of compliance is throughout the contaminant plume.

REMEDIATION GOALS

To meet the RAOs defined above, EPA has identified remediation goals to aid in defining the extent of contaminated media requiring remedial action. In general, remediation goals establish media-specific concentrations of Site contaminants that will pose no unacceptable risk to human health and the environment. Remediation goals have also been developed to establish criteria to define the source areas deemed principal threats for the Site, areas for which EPA has concluded treatment should be considered as part of the remedy.

In addition, to develop remedial alternatives for the Site, impacted media are characterized based on the actions required to minimize potential exposures to human and ecological receptors.

These potential exposures consist of:

- Direct contact with impacted media and their contaminants (referred to as “direct contact control”)

- Inhalation or ingestion of impacted media or their contaminants, including those that emit dust or vapors at unacceptable levels (referred to as “vapor control” [airborne contaminants])

- Physical movement of media beyond their containment areas that could result in contact by receptors (referred to as “movement control”)

Likewise, potential adverse ecological impacts resulting from the remedial alternatives need to be assessed. Based on the data collected to date, impoundment contents, soils and groundwater will require some form of control to address the potential exposure pathways. Addressing these exposure routes by providing direct contact, vapor and movement control, as appropriate, will result in applying different remedial approaches across the Site.

Below is a summary of the remediation goals for source areas; most notably the impoundments as well as some areas within the North Area soils, South and West Area soils and groundwater established in the Site-wide FS.

Remediation goals for source areas, Site-wide soils and groundwater are presented in Tables 7A-7D.

<u>Source Area Remediation Goals</u>

Source Area Remediation Goals were developed for areas requiring movement control and vapor control. Numerical criteria were developed to aid in defining the extent of contaminated media requiring movement control. The visual observation of tarry substances will also be utilized to identify areas requiring movement control, regardless of whether these tarry substances exceed the numerical criteria.

After reviewing the previous RIs, 2006 HHRA and the Site-wide FS, EPA has identified that the sludges and tarry substances in Impoundments 3, 4 and 5 require a remedy for movement and vapor control. Additionally, some soils within the North Area will also require movement control. A portion of the former drying bed in the South Area was also identified as requiring movement control. Pre-design investigations will be conducted to confirm the identified areas and further delineate areas containing principal threat waste.

Site-wide Soil Remediation Goals

Site-wide soil Remediation Goals were developed for areas requiring direct contact and, in some select areas, vapor control. Risk-based soil remediation goals were developed based on the potential exposure risks for ingestion, dermal contact and inhalation human health exposure pathways. Soil remediation goals were selected based upon consideration of these risk-based concentrations and promulgated NJDEP nonresidential direct contact soil remediation standards. NJDEP impact-to-groundwater soil screening criteria were also evaluated as “to-be-considered” (TBC) criteria.

Soils that exceed the soil remediation goal values, but do not constitute source areas, can generally be managed in place with engineering controls (capping) and proper land-use restrictions (institutional controls). As described earlier, both soils and impoundment contents in the North Area have concentrations that warrant the limiting of direct contact. This includes soils and impoundment contents in the entire North Area, with the exception of soils underneath Impoundments 14, 21 and 26, which have either never been used for waste disposal or were previously remediated. Existing data also indicates that some form of direct contact control is warranted in portions of the South and West Areas. This includes Impoundments 13, 17 and 24, but not the impoundments that were never used for waste disposal (9, 10, 12, 21, 22, 23), were previously remediated (11, 18, 19 and Lagoon 6), are in the process of being closed in accordance with RCRA closure plans (Lagoon 7) or are currently being remediated (15 and 16). Additionally, direct contact control is required for the former drying bed, as well as the isolated area located between Impoundment 13 and the railroad tracks that was identified as a potential risk in the HHRA and BERA. Regarding the Site soil areas requiring vapor control, there are locations within the North Area soils with contaminant concentrations exceeding screening criteria. Data for the South and West Areas indicates that vapor control is only warranted in the tarry waste portion of the former drying bed area. The direct contact, vapor and movement control areas are identified on Figures 6-8.

Groundwater Remediation Goals

Remediation goals were developed for groundwater based on the RAOs discussed earlier. The most stringent of the EPA federal MCLs, NJDEP groundwater quality criteria, NJDEP MCLs and Site-specific risk-based concentrations was selected as the remediation goal. Consistent with the RAOs for groundwater, these remediation goals will be used for developing use restrictions and other actions to prevent exposure and for assessing potential containment and restoration of the groundwater.

DESCRIPTION OF ALTERNATIVES

CERCLA requires that each remedial alternative be protective of human health and the environment, be cost-effective, comply with other statutory laws and utilize permanent solutions and alternative treatment technologies and resource recovery technologies to the maximum extent practicable. In addition, the statute includes a preference for the use of treatment as a principal element for the reduction of toxicity, mobility or volume of hazardous substances. Remedial alternatives for the American Cyanamid Site are presented in this section.

A total of seven of the eleven original alternatives were carried through the screening process presented in the Comprehensive Site-wide FS. Please refer to the Comprehensive Site-wide FS for a more detailed discussion of all the remedial alternatives.

Common Elements

Many of these alternatives include common components. Because any combination of remedial alternatives will result in some contaminants remaining on the Site above levels that would allow for unrestricted use, a review of the remedy will be conducted every five years, at minimum. The following institutional controls will also be required to maintain the long-term protectiveness of the remedy: deed restrictions to maintain the protectiveness and functional integrity of engineered capping systems; restrictive covenants to prevent future land uses that interfere with the implementation or protectiveness of the selected remedy; and a groundwater CEA/WRA to prohibit future use of the groundwater in this area and to restrict the installation of wells (other than for monitoring or remediation purposes) in the area for the duration of the CEA.

Alternative 1 - No Action

Capital Cost:	$0
Annual O&M Costs:	$0
Total Present Worth:	$0
Implementation Time frame:	*Not Applicable*

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) requires that a "No Action" alternative be developed as a baseline for comparing other remedial alternatives. Under this alternative, no action would be taken to remediate impacted soils and impoundment contents or groundwater at the Site. The current bedrock pumping system would be turned off. This alternative would only involve long-term monitoring of groundwater quality through a sampling program. Alternative 1 does not include institutional controls.

Alternative 2 – Limited Action

Capital Cost:	$683,283
Annual O&M Costs:	$32,399,257
Total Present Worth:	$33,082,537
Implementation Time frame	
Soils/Impoundments:	*Not Applicable*
Groundwater:	*30 Years*

Under this alternative, the current groundwater pumping system would continue to operate and implementation of institutional controls as described above would be implemented. Groundwater monitoring would continue to be performed as a basis for evaluating the CEA/WRA and assessing the added value of the bedrock pumping system on impacted groundwater. Restrictions placed on the Site to limit its future use would be accomplished by recording in the property deeds that potentially hazardous media may be present and that use restrictions have been imposed. Should this alternative be implemented, the potential addition of monitoring wells to supplement the current monitoring scheme would be evaluated as part of the remedial action design development.

Alternative 3 – Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Groundwater

Capital Cost:	$87,976,060
Annual O&M Costs:	$49,973,383
Total Present Worth:	$137,949,443
Implementation Time frame	
Soils/Impoundments:	*10 Years*
Groundwater:	*30 Years*

This alternative would provide a combination of containment caps over impacted areas at the Site to control the potential for exposure to contaminated soils and impoundment contents.

North/South/West Area Soils and Impoundments

For areas identified as requiring direct contact control, a 24-inch soil cover would be utilized to provide a barrier to prevent direct contact exposure with impacted media. This soil cover system would utilize an engineered cap designed and constructed to withstand the effects of up to a 500-year flood event. Appropriate controls and engineered mechanisms would also be included to safeguard against scouring, erosion or other effects from being constructed in a flood plain. In addition, an inspection and maintenance program will be developed as part of the ongoing operation plan for the soil cover system.

An engineered soil cover system would be installed over Impoundments 13, 17 and 24 (located in the South and West Areas) to prevent direct contact.

For areas identified in the Site-wide FS as requiring both vapor and movement control, a multi-layer engineered cap would be used. Measures would be employed in accordance with New Jersey requirements for vapor control as part of future construction. Where additional structural stability is needed to support a multi-layer cap (namely over Impoundments 3, 4 and 5), stabilization, or a similar physical process as determined to be appropriate during the conceptual design phase, would be employed prior to capping. This is anticipated to consist of the use of standard construction technologies such as the addition of amendments, stabilizing agents and/or the installation of physical structure (i.e., geogrids).

Groundwater

The groundwater component consists of collection of bedrock groundwater within the North, South and West Areas. While the existing bedrock groundwater collection system provides hydraulic control over much of the North Area groundwater, the effectiveness of the bedrock groundwater collection system will be improved to better achieve the groundwater RAOs. Conceptual improvements to the bedrock collection system include placing the primary extraction well(s) in a more central location of the impacted bedrock and placing targeted bedrock groundwater extraction wells to address more localized impacts, such as in the vicinity of Lagoons 6 and 7 and Impoundment 24, or in other to be determined areas (See Figure 9). Additional details of these improvements would be developed during remedial design. This remedy also includes institutional controls that would prohibit potable use of groundwater at the Site.

Additionally, localized collection of overburden groundwater in specific areas would be included, as required, to prevent the migration of contaminants not currently captured by the existing collection system (see Figure 9).

Based on the information presented in the groundwater RI reports, the following presents the proposed collection component for these areas:

- recovery system (trenches, wells and/or containment walls) around Impoundments 1 and 2 and between these impoundments and the Raritan River;

- recovery system (trenches, wells and/or containment walls) to collect impacted overburden groundwater along the north side of the North Area flood berm, north of Cuckel's Brook and the rail line;

- recovery system (trenches, wells and/or containment walls) trench between Lagoon 7/Impoundment 24 and the Raritan River to the southwest, and extending around to the area between Impoundment 24/Lagoon 6 and New Jersey American Water to the south; and

- bedrock pumping well or a series of wells in the Lagoon 7 Area to capture bedrock groundwater not currently collected by the existing bedrock pumping system.

The waters collected at the Site will be discharged to surface water following complete on-site treatment. However, if it is determined that this treatment method is not appropriate or feasible, then collected groundwater will either be re-injected following complete on-site treatment or be discharged to the local sewerage authority directly or following pre-treatment.

Alternative 4 – Consolidation/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Groundwater

Capital Cost:	*$129,530,494*
Annual O&M Costs:	*$49,973,383*
Total Present Worth:	*$179,503,877*
Implementation Time frame	
Soils/Impoundments:	*10 Years*
Groundwater:	*30 Years*

This alternative would provide a combination of caps over impacted areas at the Site to control the potential for direct contact with impacted soils and impoundments with the addition of excavation of the South and West Areas and consolidation in the North Area.

North Area Soils, Impoundments 3, 4 and 5
Includes same remedies as Alternative 3 with the exception of the South and West Area.

South and West Area Soils and Drying Bed Area
The areas identified in the FS requiring direct contact, vapor and movement control would be excavated and consolidated at the North Area in areas where the same types of controls are warranted.

Impoundments 13, 17 and 24
The material in Impoundments 13, 17 and 24 would be excavated and relocated to the North Area under an engineered soil cap.

Groundwater
Includes the same groundwater remedy as described in Alternative 3.

Alternative 4A – Consolidation/Treatment/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Ground Water

Capital Cost:	*$154,224,898*
Annual O&M Costs:	*$49,973,383*
Total Present Worth:	*$204,198,282*
Implementation Time frame	
Soils/Impoundments:	*10 Years*

Groundwater: *30 Years*

This alternative would provide a combination of caps over impacted portions of the North Area to control the potential for direct contact with impacted soils and impoundments, which is one of the primary RAOs for the Site, with the addition of excavation and consolidation in the North Area for the contents of Impoundments 13, 17 and 24 as determined by an ecological risk assessment. In addition, this alternative would address principal threat wastes found in the North Area and in Impoundments 3, 4 and 5 by consolidating them into Impoundments 3, 4 and 5 and treating these materials using in-situ solidification/stabilization (S/S) followed by capping, thereby also addressing the RAOs. See Figure 10 for details on this alternative.

<u>North Area Soils, Impoundments 3, 4 and 5</u>
Includes same remedies as Alternatives 3 and 4 with the exception of the South and West Areas area and treatment of principal threat wastes.

For impoundment areas meeting the definition of principal threat wastes, (namely, the contents of Impoundments 3, 4 and 5), in-situ S/S would be employed for the full depth of the impoundment material prior to capping (the actual depth of treatment will be established and confirmed during the remedial design phase).

For North Area soils outside of the impoundment limits that meet the definition of principal threat wastes, the material would be excavated to its full depth and consolidated within Impoundments 3, 4 and 5 for subsequent treatment with those wastes. The excavated areas outside Impoundments 3, 4 and 5 would then be backfilled and covered with the multi-layer engineered cap discussed above.

An evaluation would be conducted during the remedial design phase to identify those soils that could potentially meet the definition of principal threat wastes. This evaluation would consist of first identifying areas where constituent concentrations, based on existing data, are above those presented within EPA’s soil screening guidance, when adjusted to 1×10^{-3} risk (future Site user). Following this, field investigations (*e.g.,* air sampling) would be conducted to verify the potential air risks. Those areas subsequently identified as potential principal threat wastes (*i.e.*, presenting a 1×10^{-3} risk based on measured concentrations in the breathing zone) would be excavated and consolidated in the Impoundments 3, 4 and

5 area for subsequent treatment with those materials (see below). Excavation extent and depth would be determined based on sampling data in the breathing zone. These excavated areas outside Impoundments 3, 4 and 5 would then be backfilled and covered with the multi-layer engineered cap discussed above. Additionally, any future structures constructed within areas requiring vapor control at the Site would include a vapor mitigation system, as required.

For the remaining areas requiring direct contact and vapor controls, the same remedy as described in Alternatives 3 and 4 would be implemented.

South and West Area Soils and Drying Bed Area

The areas identified in the FS requiring direct contact, movement and vapor control would be excavated and consolidated within the North Area where the same types of controls are warranted.

Impoundments 13, 17 and 24

An ecological risk assessment will be conducted for Impoundments 13, 17 and 24 to confirm the appropriate treatment for these materials. If the ecological risk assessment identifies that any impoundment contents present an unacceptable risk, these materials would be relocated and consolidated in the North Area in areas where the same types of controls are warranted. Any impoundment contents that do not present an unacceptable risk would remain in their current location. Any impoundment contents requiring excavation and relocation would be remediated to acceptable levels, such as NJDEP ecological soil screening criteria or ecologically protective benchmarks.

Groundwater

Includes the same groundwater remedy as Alternative 3.

Alternative 5 - Consolidation/Capping and In-Situ S/S with Hydraulic Control/Treatment of Groundwater

Capital Cost:	$257,918,074
Annual O&M Costs:	$49,973,383
Total Present Worth:	$307,891,457
Implementation Time frame	
Soils/Impoundments:	*20 Years*
Groundwater:	*30 Years*

This alternative would consist of a combination of technologies to address soils and impoundment contents.

North Area Soils, Impoundments 3, 4 and 5

In the areas identified in the FS requiring direct contact control, a 24-inch soil cover would be utilized to provide a barrier to prevent direct contact exposure with impacted media. This soil cover system would be an engineered cap designed and constructed to withstand the effects of up to a 500-year flood event. Appropriate controls and engineered mechanisms will be included to safeguard against scouring, erosion or other effects from being constructed in a flood plain. In addition, an inspection and maintenance program will be developed as part of the ongoing operation plan for the soil cover system.

Impoundments 3, 4 and 5 and a few soil areas located in the North Area have been identified as requiring vapor and movement controls. These impoundment and soil areas would utilize in-situ S/S as a means to reduce contaminant mobility. During S/S activities, emissions would be collected and treated to the extent practicable.

South and West Areas (including soils, Impoundments 13, 17 and 24 and drying bed area)

The material in Impoundments 13, 17 and 24 would be excavated and relocated to the North Area under an engineered soil cap.

Groundwater

Includes the same groundwater remedy as Alternative 3.

Alternative 7 - Consolidation/Capping and Ex-Situ LTTD and S/S with Hydraulic Control/Treatment of Groundwater

Capital Costs:	$774,315,057
Annual O&M Costs:	$49,973,383
Total Present Worth:	$824,288,040
Implementation Time frame	
Soils/Impoundments:	*> 25 Years*
Groundwater:	*30 Years*

This alternative would consist of a combination of technologies to address soils and impoundment contents.

In the North Area, areas identified in the FS requiring direct contact control would receive a 24-inch soil cover to provide a barrier to prevent direct contact exposure with contaminated soil. This soil cover system would be an engineered cap designed and constructed to withstand the effects of up to a 500-year flood event. Appropriate controls and engineered mechanisms will be included to safeguard against scouring, erosion or other effects from being constructed in a flood plain. In addition, an inspection and maintenance program will be developed as part of the ongoing operation plan for the soil cover system.

Portions of the North Area requiring vapor and movement controls would be excavated and transported to a central area within the North Area for consolidation and staging. *Ex-situ* treatment would then be applied on-site, via low temperature thermal desorption (LTTD) and S/S. LTTD is a technology that uses heat to physically separate contaminants from the excavated soils. S/S would be used to provide appropriate geotechnical properties for backfilling treated materials as well as having the potential added benefit of reducing the mobility of the remaining constituents.

Treated materials from vapor control areas would be backfilled in the North Area, while treated materials from movement control areas would be placed in the Impoundment 8 RCRA Facility. Areas requiring direct contact control and vapor control would be excavated and treated on-site using a combination LTTD and ex-situ S/S. Treated materials would be backfilled on-site or placed in the on-site RCRA facility.

The material in Impoundments 13, 17 and 24 would be excavated and relocated to the North Area under an engineered soil cap.

<u>Groundwater</u>
Includes the same groundwater remedy as Alternative 3.

Alternative 11 – On-Site/Off-Site Treatment with Hydraulic Control/Treatment of Groundwater

Capital Costs:	$1,750,292,506
Annual O&M Costs:	$49,973,383
Total Present Cost:	$1,800,265,890
<u>*Implementation Time frame*</u>	
Soils/Impoundments:	> *25 Years*
Groundwater:	*30 Years*

This alternative would consist of a combination of technologies to address soils and impoundment contents.

Impoundments and soils in the North, South and West Areas, would be excavated and consolidated and staged at a predetermined location within the North Area. These materials would receive on-site ex-situ treatment, via LTTD and S/S. Treated materials from direct contact control areas would be backfilled at the North Area, while treated materials from areas warranting vapor control would be placed in the Impoundment 8 RCRA facility.

For areas identified in the Site-wide FS requiring movement control, soils and impoundment contents would be excavated and transported to either an off-site incineration or recycling facility for treatment or beneficial re-use. During S/S activities, emissions would be collected and treated, as practicable.

Groundwater
Includes the same groundwater remedy as Alternative 3

COMPARATIVE ANALYSIS OF ALTERNATIVES

In selecting a remedy, EPA considered the factors set out in CERCLA §121, 42 U.S.C. §9621, by conducting a detailed analysis of the viable remedial response measures pursuant to the NCP, 40 Code of Federal Regulations (CFR) 300.430(e)(9)(iii) and Office of Solid Waste and Emergency Response (OSWER) Directive 9355.3-01. The detailed analysis consisted of an assessment of the individual response measure against each of nine evaluation criteria and a comparative analysis focusing upon the relative performance of each response measure against the criteria. A summary of this analysis is provided below. A Detailed Analysis of Alternatives can be found in the Site-wide FS Report.

Threshold Criteria – *The first two criteria are known as "threshold criteria" because they are the minimum requirements that each response measure must meet in order to be eligible for selection as a remedy.*

1. Overall Protection of Human Health and the Environment

Overall protection of human health and the environment addresses whether each alternative provides adequate protection of human health and the environment and describes how risks posed through each exposure pathway are eliminated, reduced or controlled, through treatment, engineering controls and/or institutional controls.

Alternative 1 is used as a baseline for comparison of the alternatives and is designed to represent baseline conditions at the Site and would not meet the RAOs established for the Site. Alternative 2, by comparison, would be protective of human health and the environment for groundwater currently captured by the existing groundwater control system and SRVSA treatment, and would employ access restrictions and institutional controls to address potential exposures to other media and transport mechanisms, but would not meet RAOs for principal threat wastes and groundwater outside the current capture zone. Alternatives 3, 4, 4A, 5 and 7 include capping of material requiring direct contact control and groundwater collection/treatment and, therefore, would be protective of human health and the environment. Alternatives 3 and 4 include capping of materials requiring vapor and movement control, which would prevent exposure to impacted materials. Alternative 4A would also prevent exposure to impacted materials through capping, as well as treatment for the most-highly mobile materials, which would reduce toxicity and mobility of contaminants.

Alternatives 3, 4, 4A, 5, 7 and 11 each meet the RAOs for principal threat wastes. However, Alternatives 3 and 4 accomplish this primarily through containment while 4A, 5, 7 and 11, accomplish this primarily through treatment. Alternatives 5 and 7 include treatment of vapor and movement control material in the North, South and West Areas as an element of protection of human health and the environment; however, their treatment components are not proven for all Site contaminants and RAOs may not be met for these contaminants. Alternative 11 removes the material requiring movement control from the North, South and West Areas for off-site treatment/ disposal, while treating direct contact and vapor control material on-site which would be protective of human health and the environment. However, the capping, groundwater control and treatment-based remedy components of Alternative 4A essentially provide equivalent protection of human health and the environment by eliminating potential exposure pathways.

2. Compliance with Applicable or Relevant and Appropriate Requirement (ARARs)

Section 121(d) of CERCLA and NCP §300.430(f)(1)(ii)(B) require that remedial actions at CERCLA sites at least attain legally applicable or relevant and appropriate federal and state requirements, standards, criteria and limitations which are collectively referred to as "ARARs," unless such ARARs are waived under CERCLA section 121(d)(4). Applicable requirements are those cleanup standards, standards of control and other substantive requirements, criteria or limitations promulgated under federal environmental or state environmental or facility siting laws that specifically address a hazardous substance, *pollutant, contaminant, remedial action, location or other circumstance found at a CERCLA site. Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be applicable. Relevant and appropriate requirements are those cleanup standards, standards of control and other substantive requirements, criteria or limitations promulgated under federal environmental or state environmental or facility siting laws that, while not "applicable" to a hazardous substance, pollutant, contaminant, remedial action, location or other circumstance at a CERCLA site address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well-suited to the particular site. Only those state standards that are identified in a timely manner and are more stringent than federal requirements may be relevant and appropriate. Compliance with ARARs addresses whether a remedy will meet all of the applicable or relevant and appropriate requirements of other federal and state environmental statutes or provides a basis for invoking a waiver.*

Applicable or Relevant and Appropriate Requirements (ARARs) would not be met for Alternative 1. ARARs would not be met for groundwater outside the current capture zone of the existing groundwater collection system or for soils and impoundment contents under Alternative 2. ARARs would generally be met for the remaining alternatives. However, more significant issues would be associated with location- and action-specific ARARs (e.g., stream encroachment, wetlands, flood hazard, etc.) in the South and West Areas for Alternatives 4, 4A, 5, 7 and 11; chemical- and action-specific ARARs associated with NJ Air Pollution Control Regulations may not be met for Alternatives 5, 7 and 11; and Alternative 7 would not meet the chemical-specific ARARs associated with the Treatment Objectives established in the Group III ROD/CAMU and Land Disposal Restrictions (LDRs). Table 8 provides a list of the current ARARs and TBCs used in the evaluation of remedial alternatives.

Primary Balancing Criteria *– The next five criteria, criteria 3 through 7, are known as "primary balancing criteria". These criteria are factors with which tradeoffs between response measures are assessed so that the best option will be chosen, given site-specific data and conditions.*

3. Long-Term Effectiveness and Permanence

A similar degree of long-term effectiveness and permanence refers to the expected residual risk and the ability of a remedy *to maintain reliable protection of human health and the environment over time, once clean-up levels have been met. This criterion includes the consideration of residual risk that will remain on-site following remediation and the adequacy and reliability of controls.*

Long-term effectiveness and permanence do not apply to the baseline conditions represented by Alternative 1. By comparison, Alternative 2 would provide some degree of long-term remediation for groundwater within the current capture zone of the existing bedrock groundwater pumping system, but would not specifically address other media or groundwater outside the current capture zone. The groundwater remedy components for Alternatives 3, 4, 4A, 5, 7 and 11 provide a more certain effectiveness of groundwater control over the long-term, and remedies that would be functionally permanent with proper maintenance. Capping of material requiring direct contact control associated with Alternatives 3, 4, 4A, 5 and 7 would be effective over the long-term in controlling potential direct contact exposure. A cap is functionally permanent with proper maintenance. Alternatives 3, 4, 4A, 5, 7 and 11 would result in making the Site available for beneficial community reuse, although the time required to achieve this would be longer for Alternatives 5, 7 and 11, compared to Alternatives 3, 4 and 4A. Alternative 4A also utilizes some degree of treatment and/or consolidation which would provide additional permanence over Alternatives 3 and 4. Treatment associated with Alternatives 7 and 11 has not demonstrated effectiveness for the full range of contaminants, which would likely prolong schedules and increase time before RAOs would be attained, if they would be attained at all.

4. Reduction in Mobility, Toxicity or Volume through Treatment

Reduction of toxicity, mobility or volume through treatment refers to the anticipated performance of the treatment technologies that may be included as part of a remedy.

Alternative 1 would provide no reduction in mobility, toxicity or volume. For Alternative 2, the mobility, toxicity and volume of contaminants in groundwater within the capture zone of the existing groundwater collection system would be reduced, but would not be reduced outside the existing capture zone or in other media. Groundwater collection and treatment associated with the remaining alternatives (3, 4, 4A, 5, 7 and 11) would control mobility of contaminants through capture, would reduce the volume and toxicity of contaminants through treatment and would be permanent. Capping associated with Alternatives 3, 4 and 4A would reduce mobility via control of vapor, movement and infiltration. In-situ S/S associated with Alternatives 4A and 5 would reduce contaminant mass through media transfer and mobility through binding the treated mass and limiting infiltration. LTTD and S/S associated with Alternatives 4A, 5, 7 and 11 would reduce contaminant mass through the treatment and capture of contaminants; however, S/S associated with Alternatives 4A, 5, 7 and 11 would increase the total volume of material.

5. Short-Term Effectiveness

Short-term effectiveness addresses the period of time needed to implement the remedy and any adverse impacts that may be posed to workers, the community and the environment during construction and operation of the remedy until cleanup levels are achieved.

No short-term effects would be anticipated with implementation of Alternatives 1 or 2, and the implementation time frames for both would be immediate. The duration of implementation for Alternatives 3, 4 and 4A would be relatively short at approximately 10 years. The implementation duration for Alternatives 5, 7 and 11 would be relatively long (over 20 years). Implementation of the remedial actions associated with Alternative 3 would be minimally disruptive, resulting in minimal short-term impacts and would be limited in wetland areas and ecological habitats, as well as the South and West Areas. Implementation impacts would occur in wetlands and ecological habitats with implementation of Alternatives 4 and 4A; however, enhancement of existing, nonimpacted wetlands and habitats and/or creation of new wetlands/habitats would be employed to mitigate impacts. Implementation of excavation, consolidation and treatment activities associated with Alternatives 5, 7 and 11 would result in large-scale intrusions and material disturbances, increasing the opportunity for emission generation and material release to the environment with commensurate complexity in implementation of effective controls. Additionally, such large-scale intrusions as associated with Alternatives 5, 7 and 11 would result in destruction of existing wetlands and habitats; and, temporary, but detrimental, disruption of habitat and flora/fauna communities would occur in surrounding areas during implementation; however, enhancement of existing, nonimpacted wetlands and habitats and/or creation of new wetlands/habitats would be employed to mitigate impacts.

Increases in truck traffic through the local community would occur during construction of Alternatives 3, 4, 4A, 5, 7 and 11. However, trucks would be carrying only S/S admixtures, clean fill and construction materials with the implementation of Alternatives 3, 4, 4A, 5 and 7, while trucks would be carrying the most highly contaminated material from the Site to off-site treatment/disposal facilities with the implementation of Alternative 11. The potential for exposure to workers during construction for Alternative 3 would be minimal due to the minimally invasive nature of the construction. However, worker exposures would be increased with the implementation of Alternatives 4 and 4A, and even more so with Alternatives 5, 7 and 11, due to the increase in generation of air emissions related to excavation, consolidation and treatment. The potential for exposure to workers would be reduced with appropriate use of personal protective equipment and proper implementation of engineering controls and material/waste handling procedures.

6. Implementability

Implementability addresses the technical and administrative feasibility of a remedy from design through construction and operation. Factors such as availability of services and materials, administrative feasibility and coordination with other governmental entities are also considered.

A review of the implementability of Alternatives 1 and 2 is not applicable since either no action is taken or the actions are largely already complete. The engineered capping systems associated with Alternatives 3, 4, 4A, 5, 7 and 11 are proven, reliable technologies and would be readily constructed and maintained. Alternatives 3, 4 and 4A rely on capping as a component of the remedy and would be readily implementable; however, Alternative 4A also utilizes in-situ S/S to limit infiltration and reduce the mass and mobility of contaminants. Alternative 4A offers additional protection by also excavating materials which could meet the definition of principal threat waste with subsequent consolidation into Impoundments 3, 4 and 5 and treatment via in-situ S/S. In-situ S/S associated with Alternative 5 may prove difficult due to locations, nature of material and surroundings (*i.e.*, South and West Areas, wetlands, etc.).

The treatment components of Alternatives 7 and 11 for the Site material are unproven. The effectiveness of the LTTD component of Alternatives 7 and 11 would be limited by the characteristics of the waste at the Site. The waste materials contain high concentrations of tars and other organics, elevated sulfur levels, large quantities of heterogeneous debris and have a high moisture content, all of which limit the effectiveness of LTTD. The intrusive excavation activities and extensive materials handling required for Alternatives 7 and 11 would result in increased air emissions, which could pose an increased risk to Site workers and the surrounding community if not adequately controlled. LTTD was tested on Impoundment 3 and found not to be effective due to the high levels of air emissions, even with extensive controls. The potential for worker and community exposure would be minimized with the implementation of Alternative 4A in comparison with other alternatives, such as Alternatives 7 and 11. In addition, treatment via in-situ S/S associated with Alternative 4A would be equally effective at achieving the RAOs for soils and impoundment contents at the Site.

Equipment, materials and personnel necessary to implement Alternatives 3, 4, 4A, 5, 7 and 11 are typically available in the marketplace; however, qualified contractors that would implement the types of remedial projects associated with Alternatives 5, 7 and 11 may not be available or accessible for the entire duration of construction due to their relatively long implementation time frames. The stabilization of materials to support a cap for Alternatives 3, 4 and 4A utilizes proven geotechnical technologies; however, the variability of materials on-site could require additional treatment and affect intermediate milestones in a construction schedule.

The excavation of material proposed in Alternatives 4, 4A, 5, 7 and 11 would trigger LDRs; consequently, CAMU requirements would apply. The remaining capacity in Impoundment 8 may not be sufficient to receive treated material volumes resulting from implementation of Alternative 7 or 11. Invasive construction activities in the South and West Areas may increase the time required prior to initiation of the remedies employed by Alternatives 4, 4A, 5, 7 and 11. Regulatory review and approvals would be required from state and federal agencies; these would be of a standard, routine nature for Alternatives 3, 4 and 4A, but would be more extensive for Alternatives 5, 7 and 11. Failures/iterations relative to S/S and LTTD associated with Alternatives 5, 7 and 11 would likely cause construction delays and may result in ARARs not being attained.

For the material in Impoundments 13, 17 and 24, Alternative 3 utilizes an engineered soil cover to prevent direct contact. Alternatives 4, 5 and 7 call for the excavation and relocation of these materials into the North Area followed by the placement of an engineered soil cover. Alternative 11 requires the excavation and relocation of this material into the North Area for treatment via LTTD and S/S. Alternative 4A is readily implementable and would be similar to Alternatives 4, 5 and 7, if relocation of the impoundment material in the South and West Areas to the North Area where the same types of controls is warranted, if required by the results of an ecological risk assessment. This approach ensures that existing wetlands and habitat are not impacted unnecessarily and ensures that materials which pose an unacceptable risk are adequately addressed.

The groundwater collection and treatment component of Alternatives 3, 4, 4A, 5, 7 and 11 are proven, reliable technologies and would be readily implementable. Monitoring for Alternatives 2, 3, 4, 4A, 5, 7 and 11 would be effective in identifying successful operation of the remedy.

7. Cost

Includes estimated capital and Operations and Maintenance (O&M) costs, and net present worth value of capital and O&M costs.

The estimated capital cost, O&M and present worth cost are discussed in detail in the Site-wide FS. The cost estimates are based on the best available information. Alternatives 1 ($574,000) and 2 ($33.1 million), No Action and Limited Action, respectively, would incur the least cost to implement. Alternative 3 would cost $138 million. Alternative 4 ($180 million) would cost 30% more than Alternative 3. Alternative 4A ($205 million) would cost 49% more than Alternative 3 and 14% more than Alternative 4. Alternatives 5 ($308 million) and 7 ($825 million) are significantly more costly, at more than two and almost six times more costly than Alternative 3, respectively. Alternative 11 ($1.8 billion) would be the most costly, at more than twice the cost of the next most costly (Alternative 7), and would be at least an order of magnitude higher in cost than other alternatives that meet the RAOs.

Modifying Criteria *– The final two evaluation criteria, criteria 8 and 9, are called "modifying criteria" because new information or comments from the state or the community on the Proposed Plan may modify the preferred response measure or cause another response measure to be considered.*

8. State/Support Agency Acceptance

Indicates whether based on its review of the RI/FS reports and the Proposed Plan, the state supports, opposes and/or has identified any reservations with the selected response measure.

The State of New Jersey concurs with EPA's Selected Remedy in this ROD.

9. Community Acceptance

Summarizes the public's general response to the response measures described in the Proposed Plan and the RI/FS reports. This assessment includes determining which of the response measures the community supports, opposes and/or has reservations about.

EPA solicited input from the community on the remedial alternatives proposed for OU4 and received extensive oral and written comments. The attached Responsiveness Summary addresses the comments received during the public comment period. The community (residents, nearby property and business owners) had widely varied positions, from support to strong reservations about EPA's Proposed Plan. The Mayor of Bridgewater and township council members expressed strong support for EPA's preferred remedy. More specifically, support was received by a New Jersey Assemblyman, a member of the New Jersey Senate Environmental Committee, the Somerset County Board of Chosen Freeholders and a Bridgewater Township Councilman. Representatives from CRISIS, the primary community group and TAG recipient, endorsed EPA's preferred remedy, although some concerns were expressed regarding the details of the remedy. In addition, EPA received written and oral comments from the representatives of several regional environmental groups expressing concerns over the remedy's impact on flooding and the practicability of capping contaminated materials in a flood hazard area. These environmental groups generally opposed EPA's preferred alternative and favored a remedy that removes waste from the Site and/or treats impacted media with thermal desorption technologies.

Through general comments received during the public comment period and the public meeting, EPA has identified several issues emphasized by the community that require further clarification by the agency:

- A number of commenters expressed concerns regarding the durability of engineered caps during flood events, and how that might affect the protectiveness of the remedy;
- A number of commenters expressed concerns about the practicability of capping in a flood plain and the potential impacts of an impervious surface and the addition of fill on the stormwater patterns in the immediate vicinity;
- A number of commenters indicated a preference for the selection of a remedy that removes waste from the Site and/or treats impacted media using thermal desorption;
- A number of commenters expressed concerns over the proposed surface water discharge effluent limits for the interim treatment plant being constructed as part of the groundwater seep removal action;
- A number of commenters indicated a preference for the construction of an on-site treatment plant for the Site-wide groundwater remedy, as opposed to the use of the local sewerage authority; and
- A number of commenters indicated a preference for the use of railroads for the transportation of materials to and from the Site, as opposed to the use of trucks.

To the extent that these issues are not addressed here, they are discussed in Appendix V of this document.

PRINCIPAL THREAT WASTES

EPA's findings to date indicate the presence of principal threat wastes at the American Cyanamid Site. Principal threat wastes are considered source materials, *i.e.*, materials that include or contain hazardous substances, pollutants or contaminants that act as a reservoir for migration of contamination to groundwater, surface water or as a source for direct exposure. Principal threat wastes are those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained, or would present a significant risk to human health or the environment should exposure occur. By utilizing treatment as a significant component of the remedy, the statutory preference for remedies that employ treatment as a principal element is satisfied.

SELECTED REMEDY

Based upon consideration of the results of the Site investigations, the requirements of CERCLA, input from the National Remedy Review Board (NRRB), the detailed analysis of the response measures and public comments, EPA has selected Alternative 4A as the appropriate remedy for the impoundments, Site-wide soils and groundwater at the Site. The alternatives were discussed with the NRRB in March 2010 as part of the effort to evaluate an appropriate remedy for the remainder of the Site. The remedy presented in this ROD was selected based upon the recommendations of the NRRB.

Summary of the Rationale for the Selected Remedy

The remedy described under Alternative 4A is both a treatment- and a containment-based alternative consisting of proven technologies that would be effective in controlling and reducing the risks associated with the exposure pathways identified at the Site. The use of an engineered soil cover system throughout the North Area would effectively control direct contact and a multi-layer vapor control cap would minimize the release of contaminants into the air. The vapor control cap would be impermeable to reduce infiltration and would also include a vapor mitigation system designed to capture and treat emissions. In addition to the use of engineered capping systems, Alternative 4A also utilizes in-situ S/S in areas requiring movement control to further reduce infiltration and decrease the mass and mobility of contaminants. Alternative 4A offers additional protection by excavating materials that meet the definition of principal threat waste with subsequent consolidation into Impoundments 3, 4 and 5 and treatment via in-situ S/S.

For Impoundments 13, 17 and 24, an ecological risk assessment will be conducted to determine whether excavation and relocation into the North Area is warranted. This approach ensures that existing wetlands and habitat are not impacted unnecessarily and ensures that any materials which pose an unacceptable risk are adequately addressed. This approach also reduces the risk of impoundments in the South and West Areas being compromised by any flooding, if necessary.

Although excavation of materials from the South and West Areas would remove the potential risks associated with the potential exposure pathways in those areas, there are risks associated with excavation activities. These could include air emission and dust generation, damage to existing ecological systems, worker safety and control of construction activities

Hydraulic controls provided by improved collection/treatment of bedrock and overburden groundwater coupled with institutional controls that prohibit potable use of on-site groundwater would achieve the groundwater RAOs and provide for protection of human health and the environment. The continued use of the groundwater extraction and treatment system, supplemented by additional measures to contain and collect overburden groundwater in select areas, would provide for protection of human health and the environment by containing impacted groundwater.

This alternative is readily implementable using conventional technologies, would be potentially cost-effective and would return the Site to beneficial reuse as soon as practicable with an estimated implementation time frame of approximately 10 years for impoundments and soils and approximately 30 years for groundwater.

The selected remedy is believed to provide the best balance of tradeoffs among the alternatives based on the information available to EPA at this time. EPA believes that the selected remedy would be protective of human health and the environment, comply with ARARs, be cost-effective and utilize permanent solutions and alternative treatment technologies to the maximum extent practicable.

Description of the Selected Remedy

The selected remedy involves a combination of caps over impacted areas at the Site to control the potential for direct contact with impacted soils and impoundments, which is one of the primary RAOs for the Site. This alternative would address principal threat wastes found at several locations in the North Area through consolidation into Impoundments 3, 4 and 5, followed by treatment via in-situ S/S and capping, thereby addressing the RAOs. Impoundments 13, 17 and 24 would be excavated and relocated into the North Area where the same types of control are warranted, if an ecological risk assessment determines that an unacceptable risk is present. See Figure 10 for visual details on this alternative. The major components of the selected remedy include:

- Waste material located within Impoundments 3, 4 and 5 will be entirely treated through in-situ S/S to prevent the migration of contaminants. An impermeable engineered vapor control barrier and an engineered soil cover system will be installed following solidification. The waste materials in these impoundments typically consist of tarry substances or high-hazard materials defined by EPA as principal threat waste.

Site-wide soils that consist of tarry substances or principal threat wastes will require complete excavation and relocation to Impoundments 3, 4 and 5. Following relocation, these soils will be treated using in-situ S/S, along with the remaining materials in Impoundments 3, 4 and 5 as stated above.

In-situ S/S reduces the mobility of principal threat waste by sequestering contaminants to restrict migration and reduce leaching to the groundwater. In addition to immobilizing contaminants in a solid matrix, in-situ S/S may also chemically convert certain contaminants into a less toxic form. Effective sequestering mixes would be needed to properly treat principal threat wastes. Different in-situ S/S mixes and methods may be required for different areas of the Site. Materials that are treated with in-situ S/S will be required to meet three performance measures: minimum unconfined compressive strength of 40 pounds per square inch; maximum permeability of $1x10^{-6}$ centimeters per second; and leachability testing for site-related constituents. Leachability testing would require site-specific development during remedial design, using EPA's Synthetic Precipitation Leaching Procedure, the ANSI/ANS 16.1 method, or other appropriate methods. EPA would develop specific leaching values and select specific analytical methods in the design phase pending results of treatability studies. EPA would seek a 90 percent or greater reduction of leaching potential as a point of departure for S/S performance. Different in-situ S/S technologies would require different performance measures, though the overall in-situ S/S performance would need to be comparable (*i.e.*, similar leaching performance, from one in-situ S/S technology to the next).

Treatability testing would be conducted prior to full-scale implementation to optimize the in-situ S/S mixture and demonstrate a correlation between leachability, unconfined compressive strength and permeability performance criteria. Once this correlation is established, unconfined compressive strength and permeability would be used as the primary field criteria during implementation. During implementation of the full-scale remedial action, these performance measures would be used for the purposes of mix optimization, quality assurance and verification that the remedy is effective.

Prior to in-situ S/S of the contents in Impoundments 3, 4 and 5, the area would be cleared of vegetation and excavated for surface and subsurface debris removal (e.g., large boulders, tank pads, conduits and concrete), as these materials could interfere with the in-situ S/S process. In-situ S/S will be employed for the full depth of the impoundment material prior to capping. The actual depth of treatment will be established and confirmed during the remedial design phase. The selection of mixing equipment would be determined during final design. Dust, vapor and noise management controls would be put in place to protect workers and the community during construction activities. The potential for exposure to workers would be reduced with appropriate use of personal protective equipment and proper implementation of engineering controls and material/waste handling procedures.

Since the selected remedy requires the transportation of materials to the Site (and from the Site to a lesser extent), EPA will evaluate all transportation options, including the use of rail and trucks. A thorough review will be conducted to understand and consider the impacts to the community.

- For Site-wide soils that are determined to require vapor controls, an impermeable multi-layered engineered cap with a vapor mitigation system will be constructed. The engineered vapor control cap will reduce infiltration and the vapor mitigation system will capture and treat emissions. These soils typically contain VOCs and SVOCs, which have the potential to migrate into the atmosphere. All engineered caps will be designed and constructed to withstand the effects of a 500-year flood event; in addition, the engineered caps will be designed and constructed to protect against all Site-specific hazards which may pose a threat to their integrity, such as flooding, inadequate drainage, slope instability, erosion, freeze/thaw cycle effects, surface vegetation and any other risks associated with being located in a flood hazard area. An inspection and maintenance program for the engineered capping systems will be developed as part of the ongoing operation plan for the Site.

- For Site-wide soils determined to require a direct contact barrier, an engineered soil cover system will be utilized. Soils requiring this engineered cover typically consist of low-level contaminated soils containing hazardous substances at levels greater than NJDEP nonresidential direct contact soil remediation standards.

- An ecological risk assessment will be conducted for Impoundments 13, 17 and 24 to confirm the appropriate treatment for these materials. If the ecological risk assessment identifies that any impoundment contents present an unacceptable risk these materials would be relocated and consolidated in the North Area in areas where the same types of controls are warranted. Any impoundment contents that do not present an unacceptable risk could remain in their current location. Any impoundment contents requiring excavation and relocation would be remediated to acceptable levels, such as NJDEP ecological soil screening criteria or ecologically protective benchmarks.

- The existing bedrock groundwater collection system will be improved by relocating the primary extraction wells to a more central location and by adding new extraction wells, as necessary, to ensure that all Site-related groundwater is captured. In addition, a recovery system (such as trenches, wells and/or containment walls) will be constructed for collection of overburden groundwater at several locations. The potential components of the groundwater remedy are shown on Figure 9. The details of these improvements will be developed during the remedial design phase. These improvements will eliminate the migration of contaminants exceeding the more stringent of federal MCLs and NJ GWQS in the overburden and bedrock aquifers beyond the point of compliance through a combination of source actions and hydraulic controls and will restore the overburden and bedrock aquifers within the area of attainment to its expected beneficial use and to concentrations below the more stringent of federal MCLs and NJ GWQS within a reasonable period, as practicable. The waters collected at the Site will be appropriately treated or pre-treated, as necessary, for subsequent discharge in accordance with appropriate requirements. The waters collected at the Site will be discharged to surface water following complete on-site treatment. However, if it is determined that this treatment method is not appropriate or feasible, then collected groundwater will either be re-injected following complete on-site treatment or be discharged to the local sewerage authority directly or following pre-treatment.

- Institutional controls, monitoring and periodic reviews will also be required to ensure that the remedy remains protective of public health and the environment. The following institutional controls will be implemented as part of the remedy: deed restrictions to maintain the protectiveness and functional integrity of engineered capping systems; restrictive covenants to prevent future land uses that interfere with the implementation or protectiveness of the selected remedy; and a groundwater CEA/WRA to prohibit future use of the groundwater in this area and to restrict the installation of wells (other than for monitoring or remediation purposes) in the area for the duration of the CEA. Monitoring of the engineered capping systems, sediment, surface water and groundwater will be required as part of the ongoing operation plan at the Site. The details of the maintenance and monitoring requirements for the engineering controls will be determined in the remedial design phase.

STATUTORY DETERMINATIONS

Under its legal authorities, EPA's primary responsibility at Superfund sites is to undertake remedial actions that achieve adequate protection of human health and the environment. In addition, Section 121 of the CERCLA establishes several other statutory requirements and preferences. These specify that, when complete, the selected remedial action for a site must comply with applicable or relevant and appropriate environmental standards established under federal and state environmental laws unless a statutory waiver is justified. The selected remedy also must be cost-effective and utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. Finally, the statute includes a preference for remedies that employ treatment that permanently and significantly reduces the volume, toxicity or mobility of hazardous wastes as its principal element. The following sections discuss how the selected remedy meets these statutory requirements.

Protection of Human Health and the Environment

The selected remedy will be protective of both human health and the environment. The soil cover system would contain source materials and eliminate potential direct-contact exposure to material, thereby eliminating risk. Additionally, the placement of the multi-layer caps in the areas of vapor and movement control would eliminate potential exposure to these materials, thereby eliminating risks. The collection and treatment of both the overburden and bedrock groundwater would control the migration of contaminants along with implementing institutional controls to eliminate potential exposure pathways. In this manner, the RAOs for the Site would be met. If it is determined that an unacceptable ecological risk is present, invasive excavation activities in the South and West Areas may pose additional risks during implementation (*e.g.* air emissions, increased potential for migration of materials to nearby receptors). Excavation of the material, even under state-of-the-art control conditions, may result in the release of constituents to the environment. Materials which could meet the definition of a principal threat waste will be addressed in this remedy through consolidation within Impoundments 3, 4, 5 and treatment via in-situ S/S. Following treatment, the residual material will be further secured through the implementation of the multi-layered engineered cap.

The remedy will not impede the established beneficial reuse of the Site (*i.e.*, controlled, restricted access only) and will minimize the height and construction activities at the Impoundment 8 Facility. The Site could be made available for reuse within a reasonably short time after implementation (construction) of the remedy. The remedy implementation time frame of 10 years is considered to be relatively short given the complexity and volume of contamination at the Site. The remedy will provide a number of reuse options for the local community, aligning with local needs for potential recreational use and regional green-way initiatives.

<u>Compliance with Applicable or Relevant and Appropriate Requirements</u>

The selected remedy, Alternative 4A, will comply with all federal and state requirements which are applicable or relevant and appropriate to its implementation. As listed in Table 8, chemical-specific ARARs, such as NJ GWQSs and MCLs, would be met over time within the capture zone of the groundwater collection system for site-related chemicals. However, the time required to return groundwater to NJ GWQS is estimated at over 30 years. Capping would meet chemical-specific ARARs for other materials (*i.e.*, NJ soil remediation standards, RCRA requirements and ecologically-based screening criteria).

The remedial action would be conducted in accordance with location- and action-specific ARARs, pertinent TBCs and guidance, including the NJ Spill Compensation Control Act, Brownfields and Contaminated Site Remediation Act, NJ technical requirements for site remediation and NJ guidance for the remediation of contaminated soils (including deed notice as well as modification to groundwater CEA), NJ and federal wetlands and flood plain requirements, NJDEP air pollution control limits, LDRs (40 CFR Part 268), CAMU requirements (40 CFR Part 264, Subpart S), RCRA requirements and Clean Water Act requirements.

Cost-Effectiveness

The selected remedy is cost-effective at approximately $205 million. Capital costs associated with the alternative are approximately $155 million and the estimated total O&M cost for this alternative is approximately $50 million. A summary of the cost estimate for the selected remedy can be found in Table 9. A more detailed cost estimate is presented in Appendix G of the Site-wide FS.

Utilization of Permanent Solutions and Alternative Treatment Technologies to the Maximum Extent Practicable

The selected remedy represents the maximum extent to which permanent solutions and treatment technologies can be utilized in a practicable manner at the Site. Of those alternatives that are protective of human health and the environment and comply with ARARs to the extent practicable, EPA has determined that the selected remedy provides the best balance of trade-offs among the alternatives with respect to the five balancing criteria, while also considering the statutory preference for treatment as a principal element, compliance with ARARs and state and community acceptance.

The selected remedy treats source materials constituting principal threats at the Site, achieving significant reductions in the mobility and toxicity of movement control materials, while also substantially mitigating sources of groundwater contamination at the Site. The selected remedy satisfies the criteria for long-term effectiveness by in-situ S/S of wastes and capping that will effectively reduce the mobility of and potential for direct contact with contaminants remaining on-site. The selected remedy also presents substantially fewer short-term risks compared with other treatment/excavation alternatives and involves significantly fewer implementability issues, setting it apart from other alternatives involving extensive excavation of contaminated media.

Preference for Treatment as a Principal Element

By utilizing in-situ S/S treatment to the extent practicable, the statutory preference for remedies that employ treatment as a principal element is satisfied.

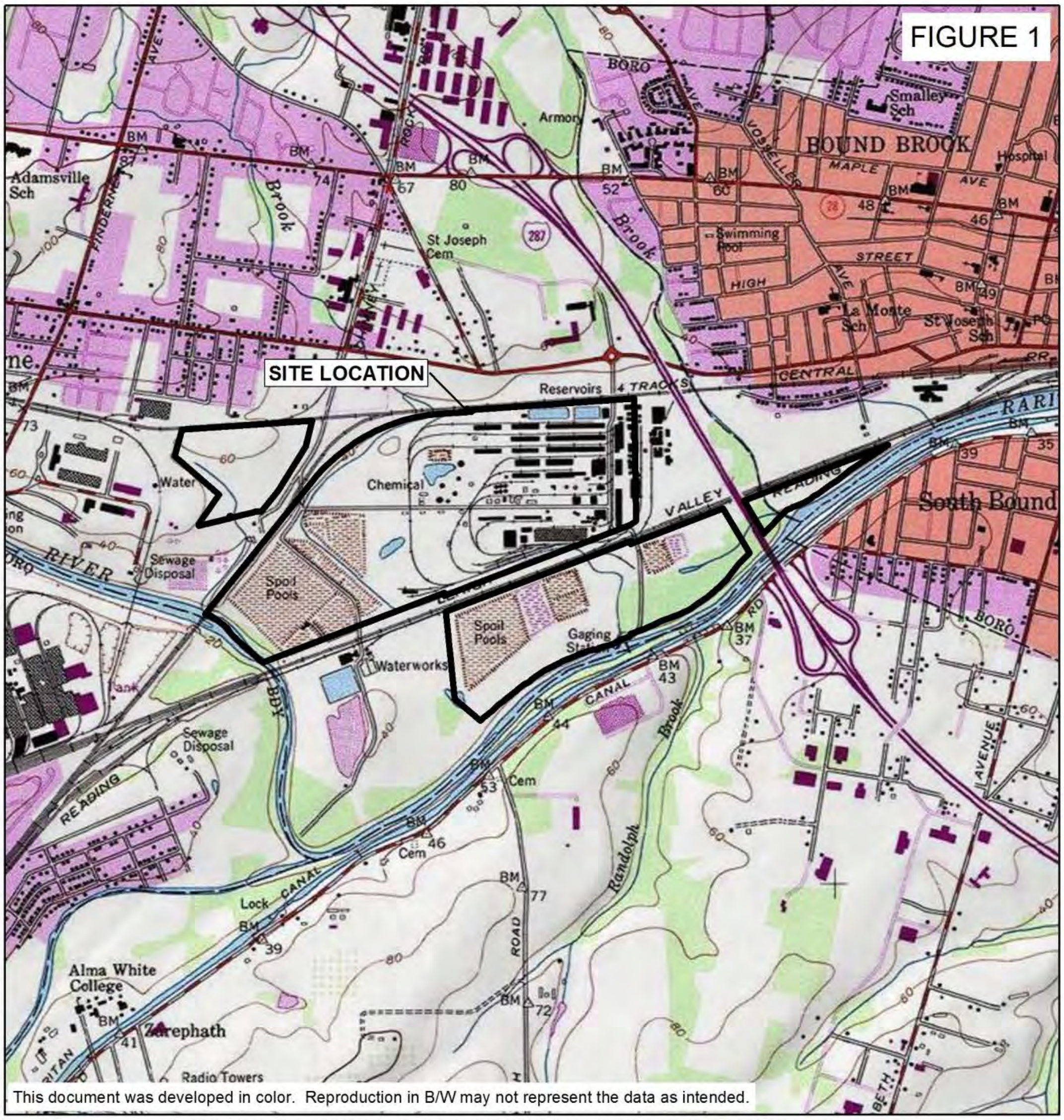
Five-Year Review Requirements

Because the remedy will result in hazardous substances, pollutants or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within five years after initiation of the remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

DOCUMENTATION OF SIGNIFICANT CHANGES

All written and verbal comments submitted during the public comment period were reviewed by EPA. All comments and EPA responses are included in the Responsiveness Summary (Appendix V). Upon review of these comments, EPA has determined that no significant changes are necessary to the preferred alternative, Alternative 4A, Consolidation/Treatment/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Groundwater, as presented in the Proposed Plan.

APPENDIX I: FIGURES



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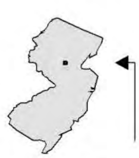
PLOT DATE: 7/25/2012 DRK

ADAPTED FROM: BOUND BROOK, NEW JERSEY USGS QUADRANGLE

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID
SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY



MAP LOCATION

N

SITE LOCATION

0 1,000 2,000 4,000 6,000 8,000
Feet

1:24,000

JULY 2012
4529/48579

O'BRIEN & GERE

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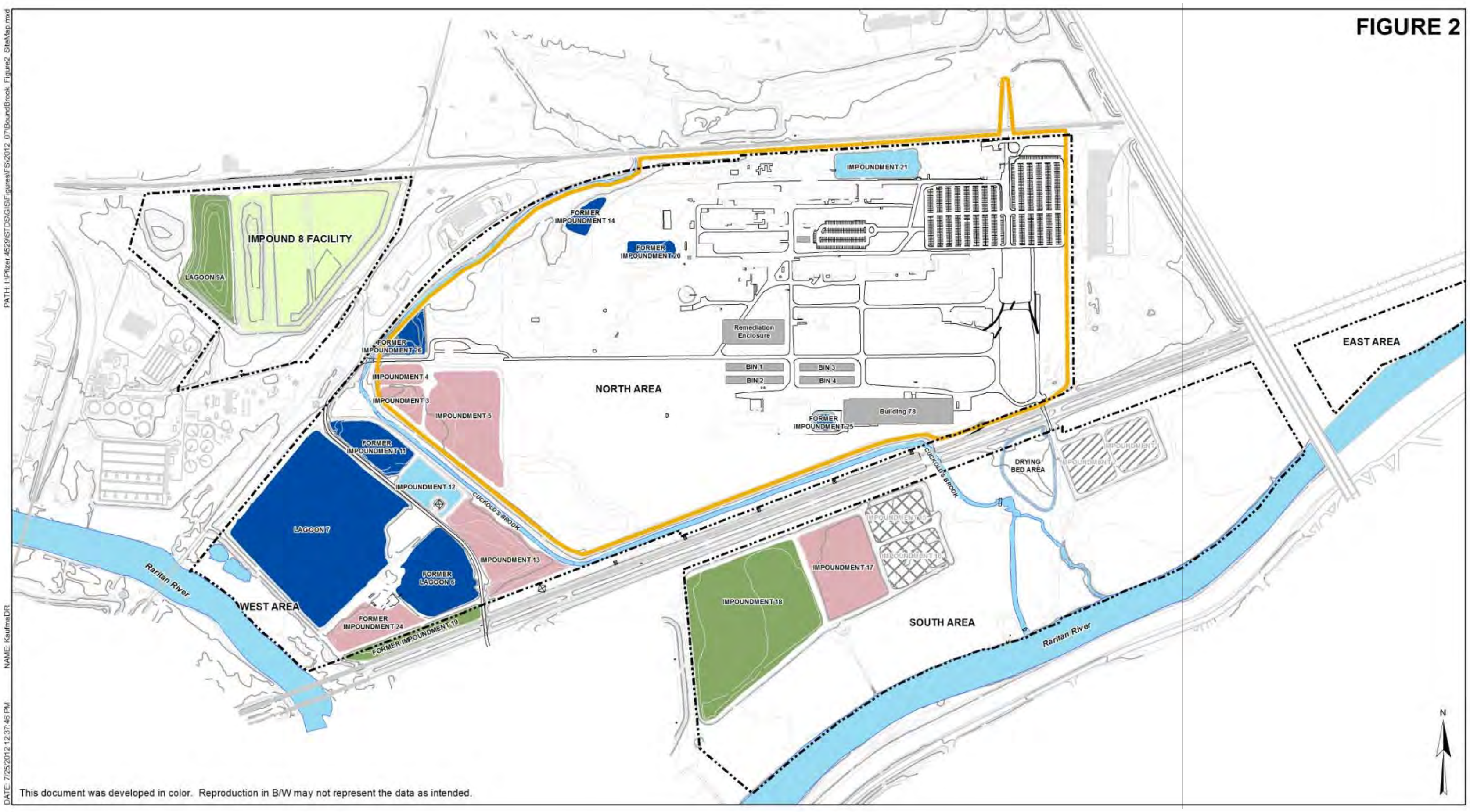
NAME: KaufmaDR

DATE: 7/25/2012 12:37:46 PM



Legend

- Approximate Property Boundary
- Flood Control Dike
- Drying Bed Area
- Impoundments to be Addressed
- Impoundments to be addressed but not included in this SWFSR
- Impoundments Never Used for Disposal & Contain Water
- Remediated Impoundments / RCRA Lagoons & Contain Water
- Remediated Impoundments / RCRA Lagoons
- Impound 8 Facility
- Remediation on-going; not included in this SWFSR

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 300 600 1,200 Feet

SITE MAP

FILE NO.
4529/48579

DATE
JULY 2012

O'BRIEN & GERE

R2-0007175

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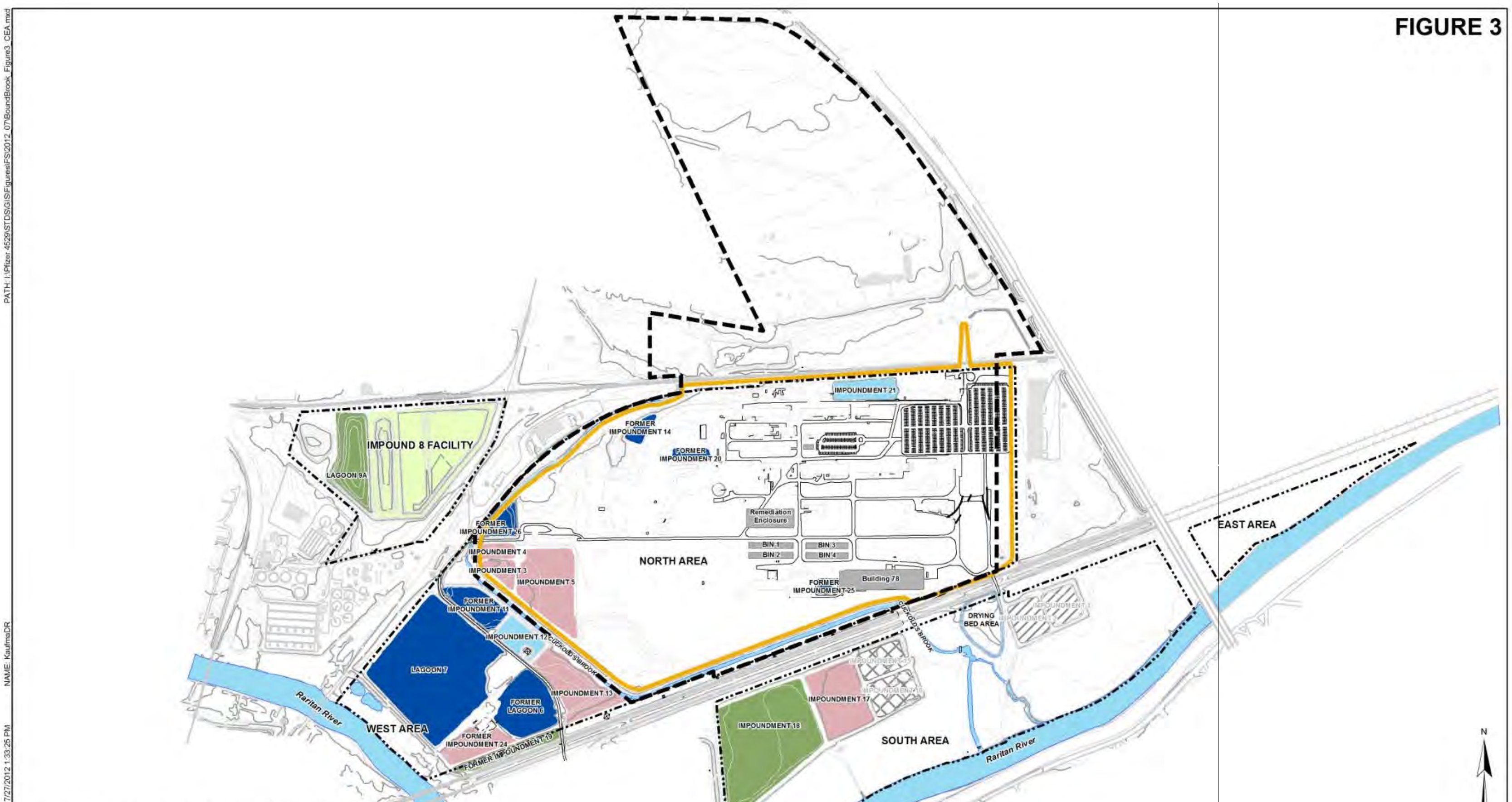
NAME: KaufmaDR

DATE: 7/27/2012 1:33:25 PM

FIGURE 3



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Legend

- Classification Exception Area
- Approximate Property Boundary
- Flood Control Dike
- Drying Bed Area
- Impoundments to be Addressed
- Impoundments to be addressed but not Included in this SWFSR
- Impoundments Never Used for Disposal & Contain Water
- Remediated Impoundments / RCRA Lagoons & Contain Water
- Remediated Impoundments / RCRA Lagoons
- Impound 8 Facility
- Remediation on-going; not included in this SWFSR

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 400 800 1,600 Feet

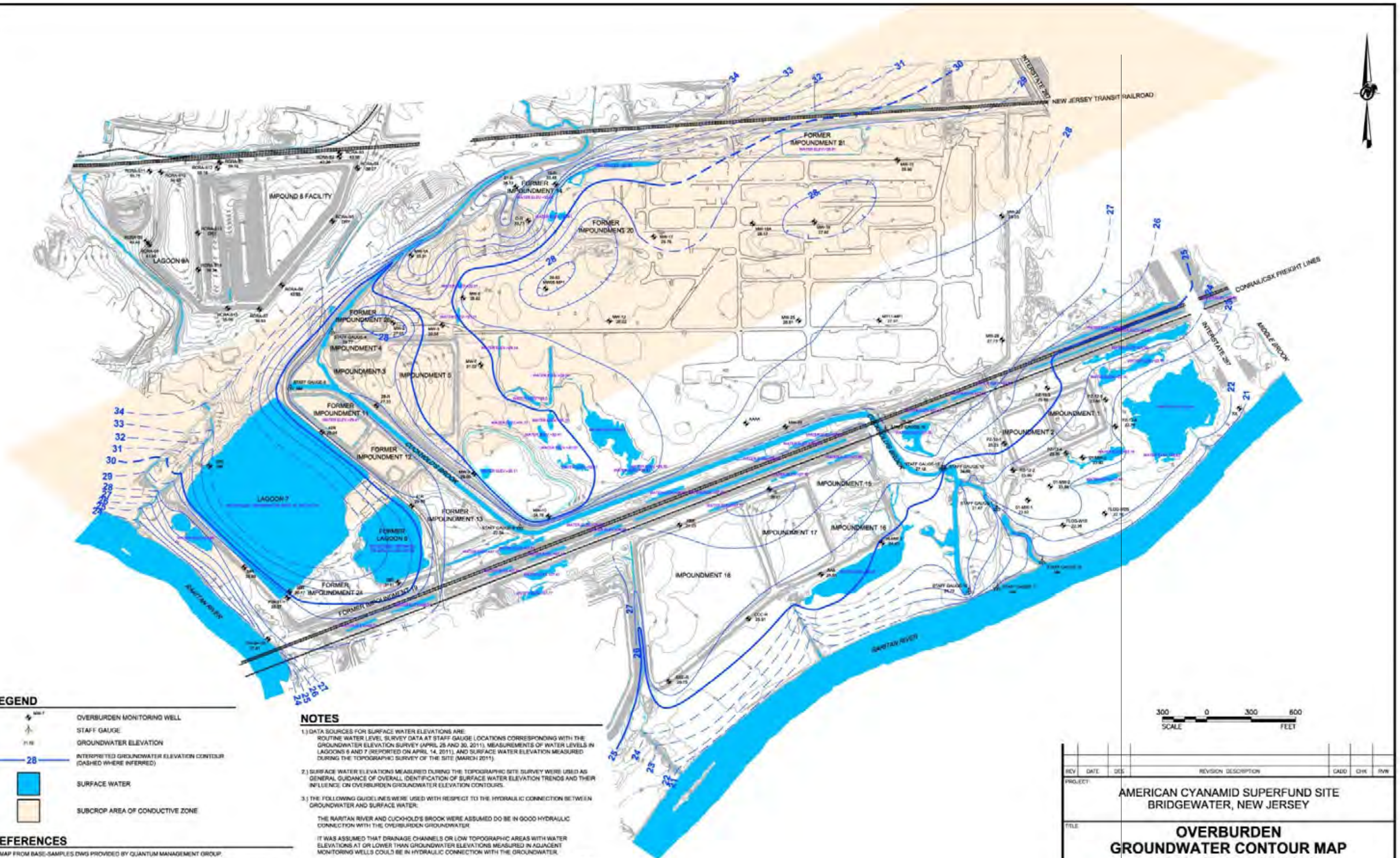
CLASSIFICATION
EXCEPTION AREA

FILE NO.
4529/48579

DATE
JULY 2012

O'BRIEN & GERE

R2-0007176



LEGEND

	OVERBURDEN MONITORING WELL
	STAFF GAUGE
	GROUNDWATER ELEVATION
—28—	INTERPRETED GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)
	SURFACE WATER
	SUBCROP AREA OF CONDUCTIVE ZONE

REFERENCES

1.) MAP FROM BASE-SAMPLES.DWG PROVIDED BY QUANTUM MANAGEMENT GROUP.

2.) MAP BASED ON AMERICAN DIGITAL CARTOGRAPHY, INC. TIGER DATA MAP, SOUNDBROOK 7.5 MINUTE QUADRANGLE.

3.) GROUNDWATER ELEVATIONS ARE IN FEET AND REFERENCE NGVD (ADD 69.29 FOR SITE DATUM).

4.) SUBCROP AREA OF CONDUCTIVE ZONE DIGITIZED FROM HARDCOPY OF FIGURE 6, ENTITLED "APPROXIMATE SUBCROP LOCATION OF TRANSMISSIVE ZONES," PREPARED BY HYDROQUAL, INC., DATED DECEMBER 13, 2004.

NOTES

1.) DATA SOURCES FOR SURFACE WATER ELEVATIONS ARE:
ROUTINE WATER LEVEL SURVEY DATA AT STAFF GAUGE LOCATIONS CORRESPONDING WITH THE GROUNDWATER ELEVATION SURVEY (APRIL 25 AND 30, 2011), MEASUREMENTS OF WATER LEVELS IN LAGOONS 6 AND 7 (REPORTED ON APRIL 14, 2011), AND SURFACE WATER ELEVATION MEASURED DURING THE TOPOGRAPHIC SURVEY OF THE SITE (MARCH 2011).

2.) SURFACE WATER ELEVATIONS MEASURED DURING THE TOPOGRAPHIC SITE SURVEY WERE USED AS GENERAL GUIDANCE OF OVERALL IDENTIFICATION OF SURFACE WATER ELEVATION TRENDS AND THEIR INFLUENCE ON OVERBURDEN GROUNDWATER ELEVATION CONTOURS.

3.) THE FOLLOWING GUIDELINES WERE USED WITH RESPECT TO THE HYDRAULIC CONNECTION BETWEEN GROUNDWATER AND SURFACE WATER:

THE RARITAN RIVER AND CUCKHOLD'S BROOK WERE ASSUMED DO BE IN GOOD HYDRAULIC CONNECTION WITH THE OVERBURDEN GROUNDWATER.

IT WAS ASSUMED THAT DRAINAGE CHANNELS OR LOW TOPOGRAPHIC AREAS WITH WATER ELEVATIONS AT OR LOWER THAN GROUNDWATER ELEVATIONS MEASURED IN ADJACENT MONITORING WELLS COULD BE IN HYDRAULIC CONNECTION WITH THE GROUNDWATER.

IT WAS ASSUMED THAT LAGOONS 6 AND 7 ARE IN RELATIVELY GOOD HYDRAULIC CONNECTION WITH UNDERLYING GROUNDWATER RESULTING IN LOCAL OVERBURDEN GROUNDWATER MOUNDING.

IT WAS ASSUMED THAT THE HYDRAULIC CONNECTION BETWEEN THE PONDING WATER IN THE IMPOUNDMENT AREAS UND UNDERLYING GROUNDWATER IS LIMITED DUE TO THE NATURE OF THE MATERIALS PRESENT IN IMPOUNDMENTS (LOW PERMEABLE SOILS, CLAY LINER, SLUDGES, ETC.)

4.) IT WAS ASSUMED THAT SOIL PILES CONSISTING OF HETEROGENEOUS MATERIALS INCLUDING FINE-GRAINED SOILS AND SLUDGES PROVIDE LOCAL ELEVATED GROUNDWATER AS A RESULT OF POOR DRAINAGE OR LOCALLY PERCHING CONDITIONS.

REV	DATE	DES	REVISION DESCRIPTION	CADD	CHK	RVW

PROJECT

AMERICAN CYANAMID SUPERFUND SITE
BRIDGEWATER, NEW JERSEY

TITLE

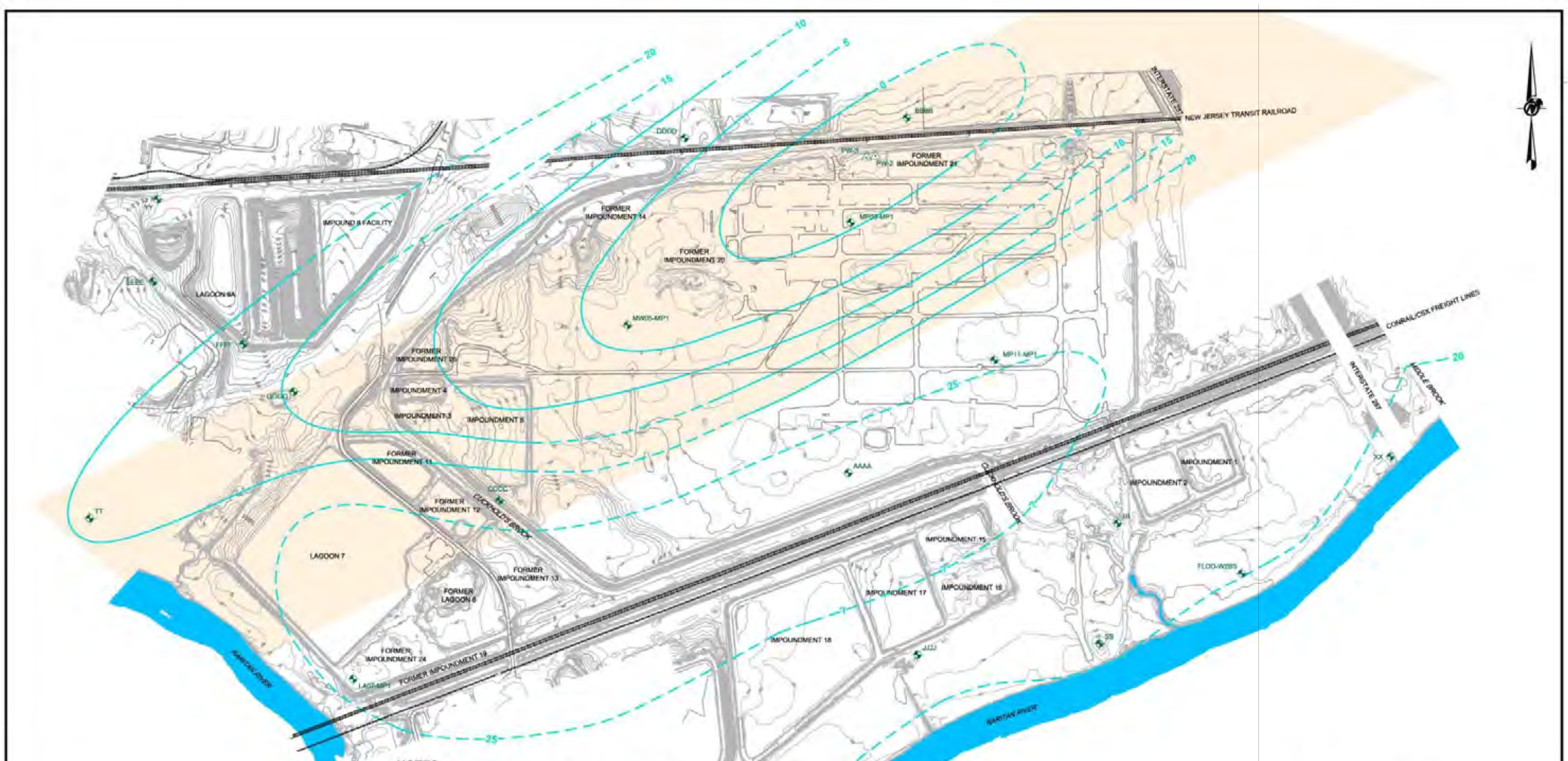
OVERBURDEN GROUNDWATER CONTOUR MAP - APRIL 25 AND 30, 2011

Golder Associates
Mt. Laurel, New Jersey

PROJECT No.		103-86245	FILE No.	10386245AMSC05
DESIGN	FG	07/23/12	SCALE AS SHOWN	REV. 0
CADD	AM	07/23/12		
CHECK				
REVIEW				

FIGURE 4

R2-0007177



LEGEND

BEDROCK WELL

BEDROCK EXTRACTION WELL

INTERPRETED GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)

APPROXIMATE SUBCROP AREA OF TRANSMISSIVE ZONES

NOTES

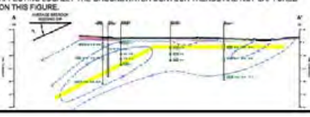
1.) THE PLAN VIEW ILLUSTRATION OF GROUNDWATER POTENTIOMETRIC CONTOURS WAS COMPLETED BY CONTOURING WATER LEVELS FROM WELL SCREENS LOCATED IN THE PROXIMITY OF TWO IMAGINARY SURFACES AS FOLLOWS:

A SURFACE PARALLEL TO THE BEDROCK BEDDING PLANES DIPPING NINE DEGREES TO THE NORTH-NORTHWEST. THIS SURFACE IS POSITIONED WITHIN THE HIGHLY PERMEABLE BEDROCK ZONES THAT SUBCROP SLIGHTLY NORTH OF CONRAIL/CSX FREIGHT LINES.

A HORIZONTAL SURFACE CORRESPONDING TO SHALLOW BEDROCK, FOR THE REMAINDER OF THE SITE AREA EXTENDING TO THE SOUTH TO THE RARITAN RIVER. TRACES OF IMAGINARY SURFACES ARE SHOWN BELOW IN CROSS-SECTIONAL VIEW.

2.) INTERPRETED GROUNDWATER CONTOURS IN THE VICINITY OF WELL SS ARE SHOWN DASHED AND WITH QUESTION MARKS BECAUSE OF QUESTIONABLE FLUTE WELL INTEGRITY.

3.) THE GROUNDWATER CONTOURS ILLUSTRATE THE GENERAL TREND OF EQUAL PRESSURE DISTRIBUTION IN THE SUBSURFACE. THE DETAILED HETEROGENEITIES AFFECTING LOCALLY THE GROUNDWATER CONTOUR TRENDS ARE NOT CAPTURED ON THIS FIGURE.



REFERENCES

1.) MAP FROM BASE-SAMPLES.DWG PROVIDED BY QUANTUM MANAGEMENT GROUP.

2.) MAP BASED ON AMERICAN DIGITAL CARTOGRAPHY, INC. TIGER DATA MAP, BOUNDBROOK 7.5 MINUTE QUADRANGLE.

3.) GROUNDWATER ELEVATIONS ARE IN FEET AND REFERENCE NGVD (ADD 69.29 FOR SITE DATUM).

4.) SUBCROP AREA OF CONDUCTIVE ZONE DIGITIZED FROM HARCOPY OF FIGURE 6, ENTITLED "APPROXIMATE SUBCROP LOCATION OF TRANSMISSIVE ZONES," PREPARED BY HYDROQUAL, INC., DATED DECEMBER 13, 2004.

300 0 300 600
SCALE FEET

REV	DATE	DES	REVISION DESCRIPTION	CADD	CHK	RVW

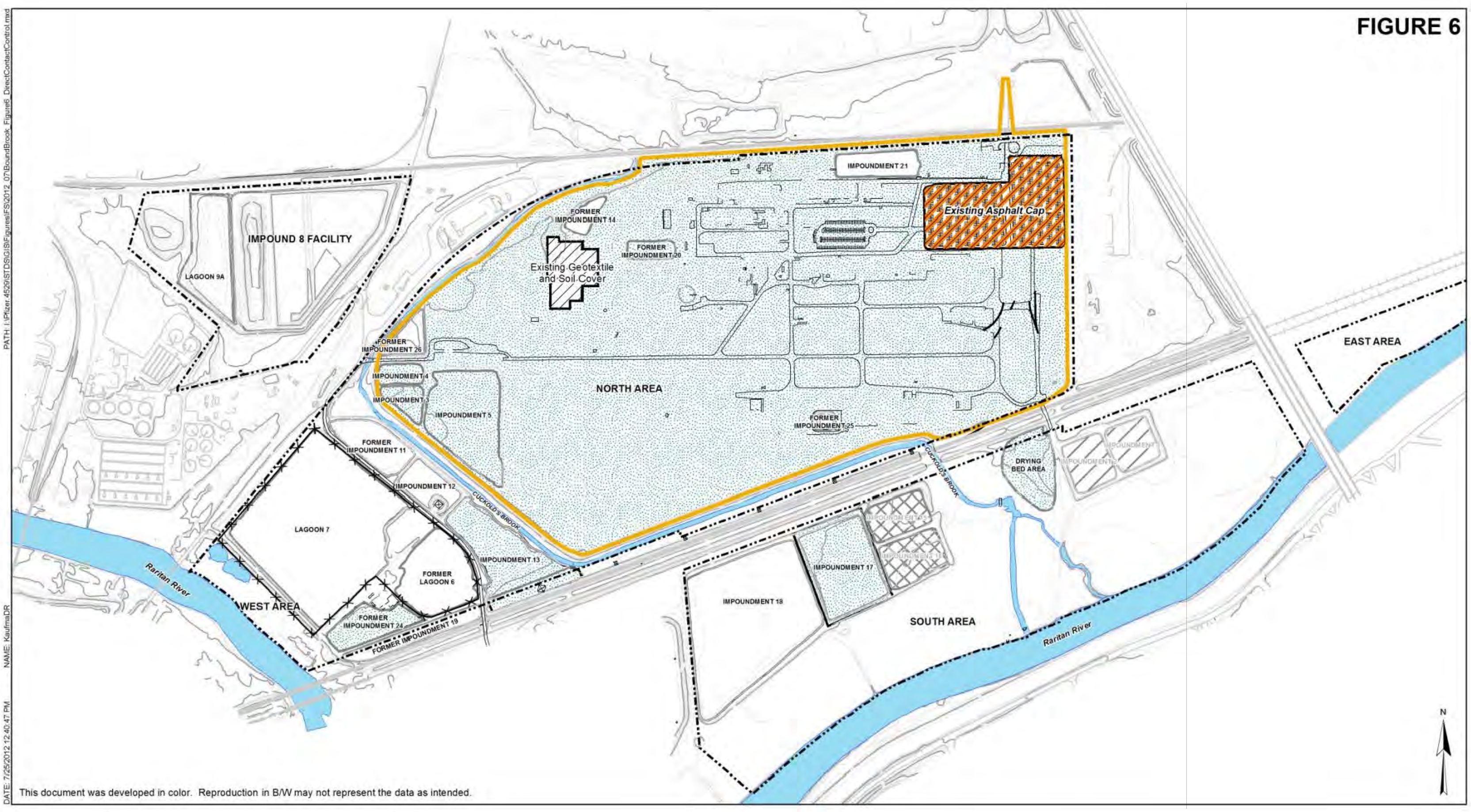
PROJECT
AMERICAN CYANAMID SUPERFUND SITE
BRIDGEWATER, NEW JERSEY

TITLE
BEDROCK GROUNDWATER CONTOUR MAP - DECEMBER 4, 2006 PUMPING RATE 450 GPM

Golder Associates
Mt. Laurel, New Jersey

PROJECT No.		103-86245	FILE No. 10386245A-MISC06	
DESIGN	FG	07/23/12	SCALE AS SHOWN	REV. 0
CADD	AM	07/23/12	FIGURE 5	
CHECK				
REVIEW				

FIGURE 6



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NAME: KaufmaDR

DATE: 7/25/2012 12:40:47 PM

Legend

- Flood Control Dike
- Approximate Property Boundary
- Impoundments
- Direct Contact Control Areas - 190 Acres
- Impoundments to be addressed but not Included in this SWFSR
- Remediation on-going; not included in this SWFSR
- Existing Geotextile and Soil Cover Installed in 1992 for Worker Direct Contact Control - Further Control not Required
- Existing Asphalt Cap Installed in 1999 for Hill Property Development - Further Control not Required
- Existing Fence with Water Cover for Direct Contact Control - Further Control not Required

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPREFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 300 600 1,200 Feet

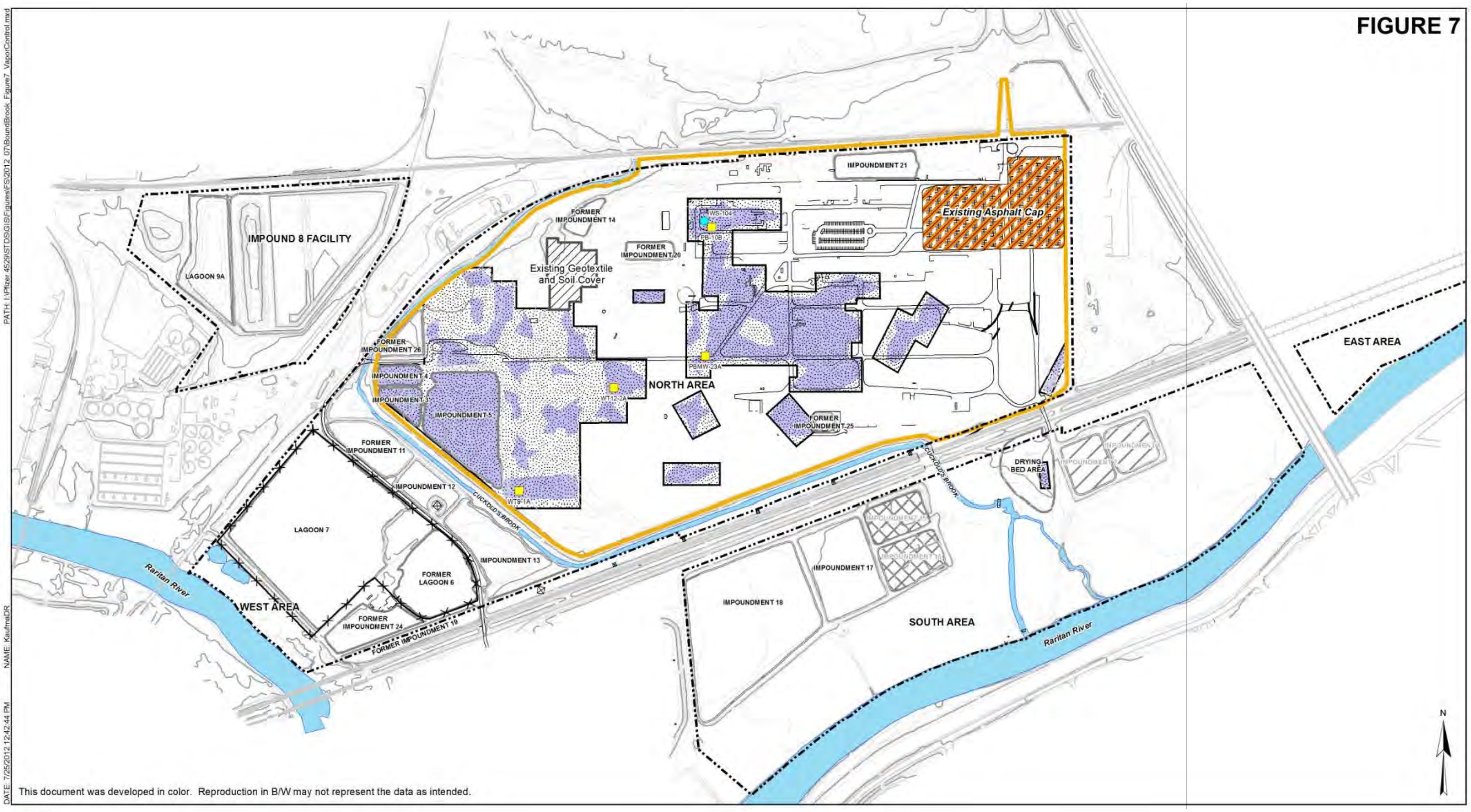
AREAS PROPOSED FOR
DIRECT CONTACT CONTROL

FILE NO.
4529/48579

DATE
JULY 2012

O'BRIEN & GERE

R2-0007179



This document was developed in color. Reproduction in B/W may not represent the data as intended.

Legend

- Flood Control Dike
- Approximate Property Boundary
- Impoundments
- Impoundments to be addressed but not included in this SWFSR
- Remediation on-going; not included in this SWFSR
- Vapor Control Areas - 38 Acres*
- Total Areas Proposed for Vapor Control - 66 Acres
- SS Locations where analytical results exceed USEPA SSL Criteria 10^-3
- SB Locations where analytical results exceed USEPA SSL Criteria 10^-3
- Existing Geotextile and Soil Cover Installed in 1992 for Worker Direct Contact Control - Further Control not Required
- Existing Asphalt Cap Installed in 1999 for Hill Property Development - Further Control not Required
- Existing Fence with Water Cover for Direct Contact Control - Further Control not Required

*These limits are preliminary and a more refined assessment method will be developed and implemented during the Remedial Design phase to appropriately delineate areas requiring vapor control.

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 300 600 1,200 Feet

AREAS PROPOSED FOR
VAPOR CONTROL

FILE NO.
4529/48579
DATE
JULY 2012

O'BRIEN & GERE

PATH: I:\Pfizer.4529\STDS\GIS\Figures\FS\2012_07\BoundBrook_Figure7_VaporControl.mxd
NAME: KaufmaDR
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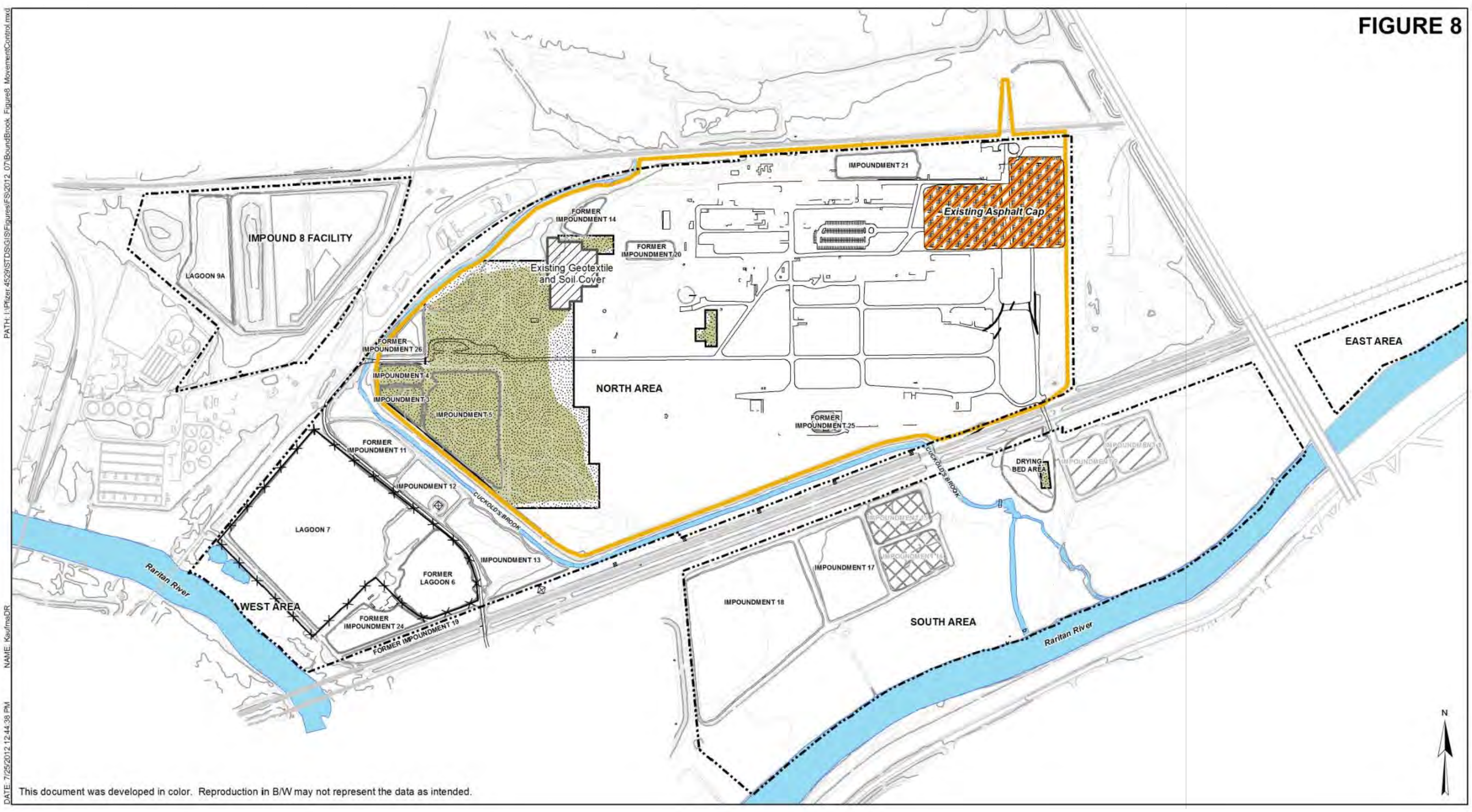
R2-0007180

FIGURE 8



PATH: I:\Pfizer.4529\STDS\GIS\Figures\FS\2012_07\BoundBrook_Figure8_MovementControl.mxd
NAME: KaufmaDR
DATE: 7/25/2012 12:44:38 PM

Legend

- Flood Control Dike
- Approximate Property Boundary
- Impoundments
- Movement Control Areas - 32 Acres
- Total Areas Proposed for Movement Control - 38 Acres*
- Impoundments to be addressed but not Included in this SWFSR
- Remediation on-going; not included in this SWFSR
- Existing Geotextile and Soil Cover
- Existing Asphalt Cap Installed in 1999 for Hill Property Development - Further Control not Required
- Existing Fence with Water Cover for Direct Contact Control - Further Control not Required

*These limits are preliminary and a more refined assessment method will be developed and implemented during the Remedial Design phase to appropriately delineate areas requiring movement control.

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 300 600 1,200 Feet

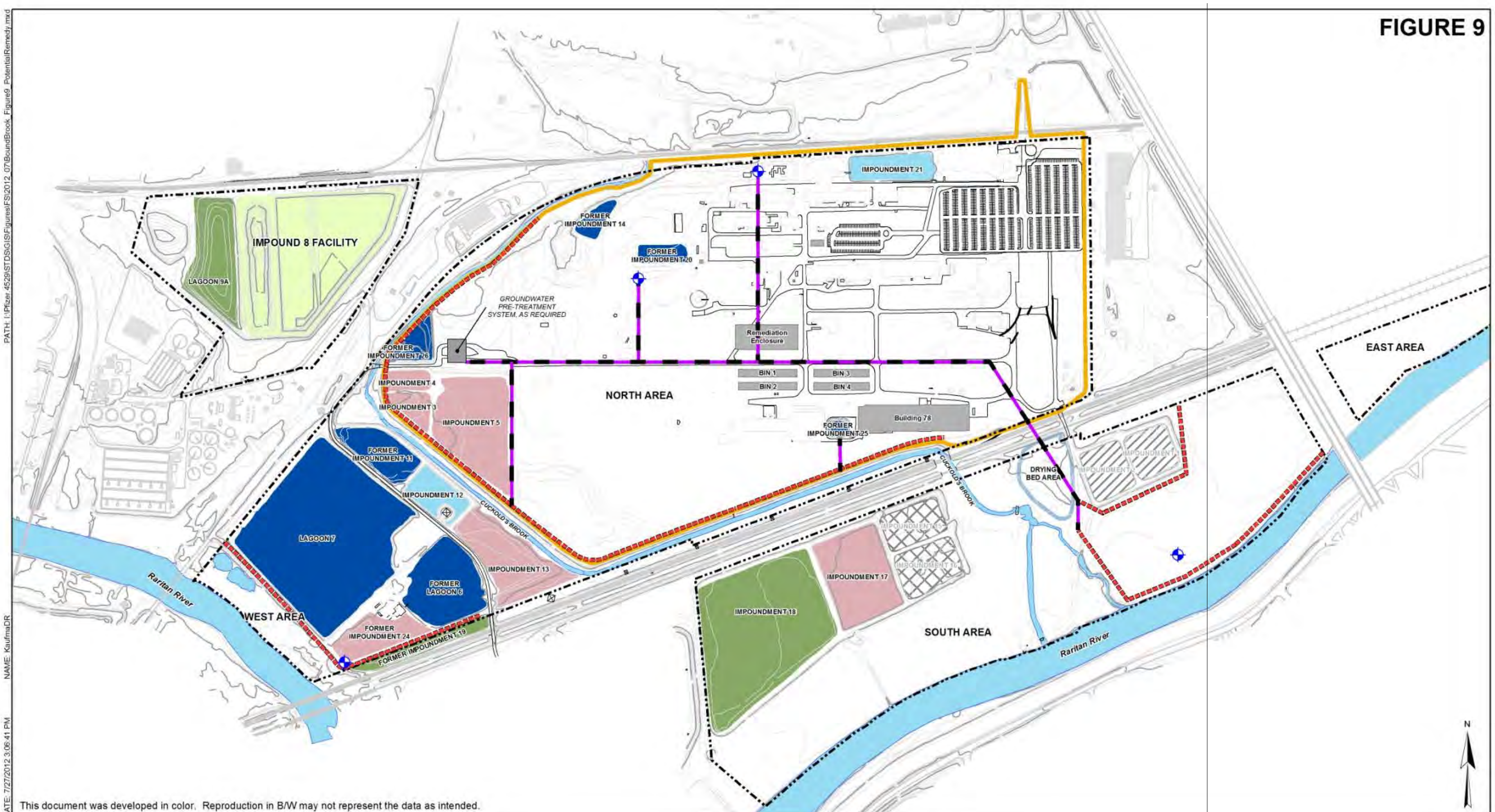
AREAS PROPOSED FOR
MOVEMENT CONTROL

FILE NO.
4529/48579

DATE
JULY 2012

O'BRIEN & GERE

R2-0007181



Legend

- Flood Control Dike
- Approximate Property Boundary
- Drying Bed Area
- Impoundments to be Addressed
- Impoundments to be addressed but not Included in this SWFSR
- Impoundments Never Used for Disposal & Contain Water
- Remediated Impoundments / RCRA Lagoons & Contain Water
- Remediated Impoundments / RCRA Lagoons
- Impound 8 Facility
- Remediation on-going; not included in this SWFSR
- Conveyance Piping
- Overburden Collection Trench
- Bedrock Extraction Well/Necessity and Final Location to be Determined During Remedial Design

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 300 600 1,200 Feet

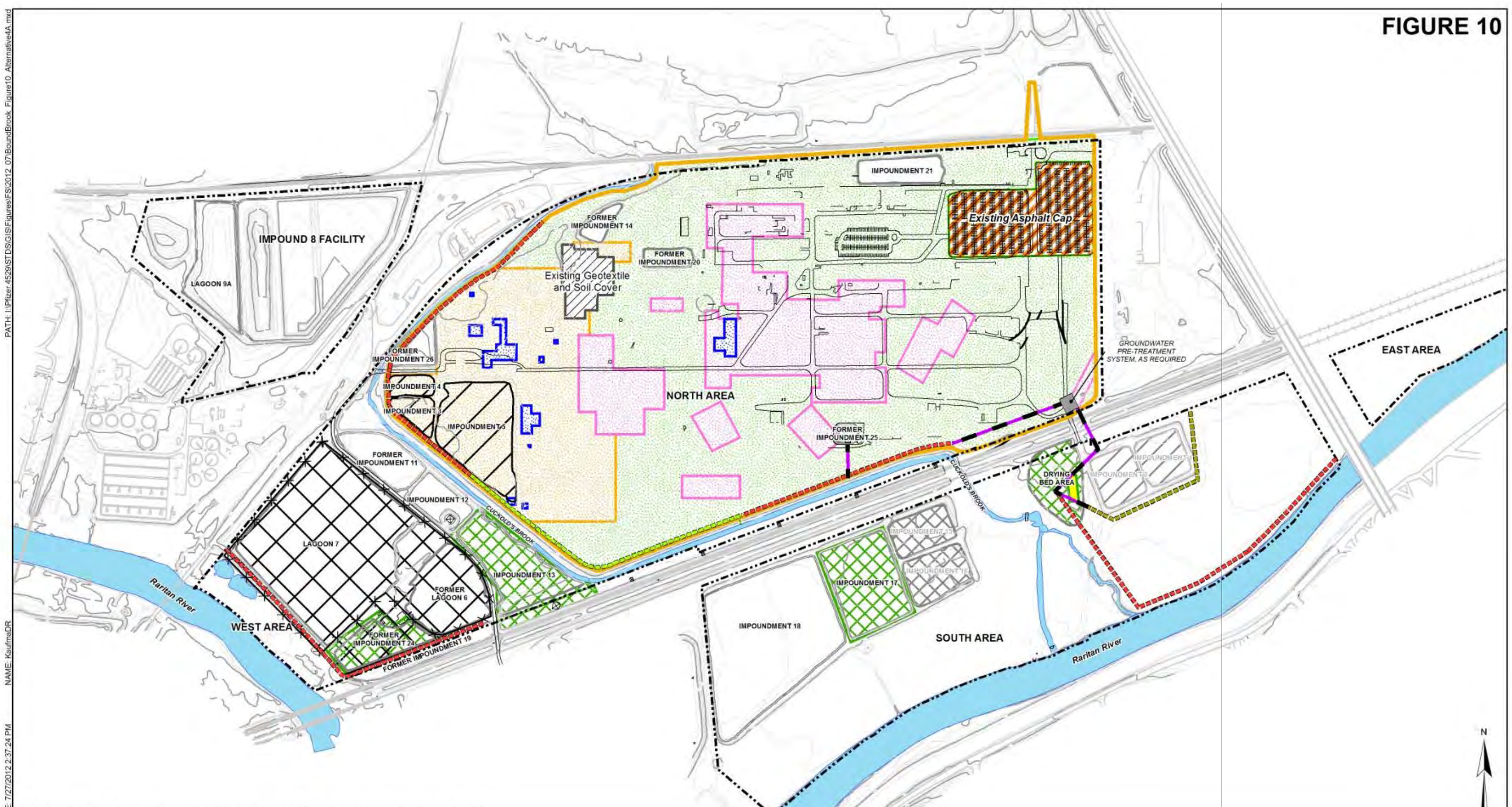
POTENTIAL COMPONENTS OF
GROUND WATER REMEDY

FILE NO.
4529/48579
DATE
JULY 2012

O'BRIEN & GERE

R2-0007182

FIGURE 10



This document was developed in color. Reproduction in B/W may not represent the data as intended.

Legend

- Flood Control Dike
- Approximate Property Boundary
- Impoundment
- In-situ Solidification
- Proposed Area for Recovery Well
- Conveyance Piping
- Collection Trench
- Higher Gradient Section
- (Final Layout and Construction Details TBD During RA)
- Impoundments to be addressed but not Included in this SWFSR
- Remediation on-going; not included in this SWFSR
- Existing Geotextile and Soil Cover Installed in 1992 for Worker Direct Contact Control - Further Control Not Required
- Existing Asphalt Cap Installed in 1999 for Hill Property Development - Further Control not Required
- Existing Fence with Water Cover for Direct Contact Control - Further Control not Required
- Excavation and Relocation to Impoundments 3, 4, & 5 - 2 Acres
- Soil Cover for Direct Contact Control - 113 Acres
- Excavation and Relocation to North Area where Same Type of Controls are Warranted (Exc. of Imp. 13, 17, & 24 TBD by Eco. RA) - 20 Acres
- Multi-layer Cap for Vapor Control - 33 Acres (Final area based on inhalation risk greater than 10^-6)
- Multi-layer Cap for Vapor and Movement Control - 36 Acres
- Excavation and Relocation to North Area for Vapor and Movement Control - 0.2 Acres

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 300 600 1,200 Feet

SELECTED REMEDY/
ALTERNATIVE 4A

FILE NO.
4529/48579
DATE
JULY 2012

O'BRIEN & GERE

The limits shown are preliminary and a more refined assessment method will be developed and implemented, as necessary, during remedial design.

APPENDIX II: TABLES

Table 1A: Summary of CERCLA Impoundments to be addressed in Focused Feasibility Study					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** *Please note that this list may not be exhaustive
Impoundment 1	2.1	3.0 MG (Approx 26,900 CY Remaining)	Storage of sludges from the coal oil ("light oil") refining process	Approx 3.0 million gallons (MG) of light oil sludge (LOS) layer removed and recycled; solids not yet remediated, to be addressed in a separate FFS	benzene, toluene, xylene, 1,2-dichlorobenzene, naphthalene, nitrobenzene, arsenic, barium, chromium, copper, lead, mercury, nickel, selenium, silver, zinc. pH less than 2
Impoundment 2	2.3	3.1 MG (Approx 26,700 CY Remaining)	Storage of sludges from the coal oil ("light oil") refining process	Approx 3.1 MG of light oil sludge (LOS) layer removed and recycled; solids not yet remediated, to be addressed in a separate FFS	benzene, toluene, 1,2 –dichlorobenzene, naphthalene, chromium, copper, lead, mercury, nickel, selenium, zinc. pH less than 2

Table 1B: Summary of CERCLA Impoundments Currently Undergoing Remediation					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** *Please note that this list may not be exhaustive
Impoundment 15	2.8	58,750 CY (94,000 tons) remediated to date (Approx 39,050 CY Remaining)	Storage of iron oxide material resulting from iron use in aniline production	Remediation in progress - iron oxide materials being excavated and sent off-site for recycling	iron oxide, acetone, benzene, methylene chloride, xylenes, 4-chloroaniline, n-nitrosodiphenylamine, anthracene, naphthalene, phenanthrene, arsenic, copper, lead, zinc, PCBs
Impoundment 16	3		Storage of iron oxide material resulting from iron use in aniline production	Remediation in progress - iron oxide materials being excavated and sent off-site for recycling	iron oxide, acetone, benzene, methylene chloride, xylenes, 4-chloroaniline, n-nitrosodiphenylamine, anthracene, naphthalene, phenanthrene, pyrene, arsenic, copper, lead, zinc, PCBs

Table 1C: Summary of CERCLA Impoundments Addressed in this Proposed Plan

Impoundment	Area (acres)	Volume Remediated	Description/Use	Current Status	COCs *Please note that this list may not be exhaustive
Impoundment 3	1.3	Not Yet Remediated (Approx 30,200 CY Remaining)	Storage of organic tars from the distillation of coal oil and consolidation of construction material, general plant debris and fill material	Not yet remediated; being addressed as part of this Proposed Plan	benzene, toluene, xylene, naphthalene, n-nitrosodiphenylamine, 2-methylnaphthalene, 1,2-dichlorobenzene, nitrobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, vanadium, pH of 4-8
Impoundment 4	1	18,700 CY Remediated (Approx 4,300 CY remaining in Impoundment 4 and 110,330 CY remaining in Impoundment 5)	Storage of sludges and organic tars from various production processes	Approximately 3.8 MG of pumpable sludge removed and recycled; remaining material not yet remediated, being addressed as part of this Proposed Plan	benzene, toluene, xylene, 1,2- dichlorobenzene, naphthalene, pH of 1-3
Impoundment 5 (wet)	5.2		Storage of sludges and organic tars from various production processes	Approximately 3.8 MG of pumpable sludge removed and recycled; remaining material not yet remediated, being addressed as part of this Proposed Plan	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, vanadium, zinc, pH of 3.7-9.0
Impoundment 5 (dry)	2.5	17,500 CY Remediated	Storage of sludges and, later, mixed fill materials (layered over the sludge)	Approximately 33% excavated, solidified and placed in Impound 8; remaining material not yet remediated, being addressed as part of this Proposed Plan	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, vanadium, zinc, pH of 3.7-9.0
Impoundment 13	3.9	Not Applicable (N/A) (Approx 55,000 CY Remaining)	Storage of lime and disposal of wastewater treatment sludges	Being addressed as part of this Proposed Plan	benzene, toluene, ethylbenzene, xylene, chlorobenzene, acenaphthalene, fluorine, 2-methylnapthalene, naphthalene, 1,2,4-trichlorobenzene, arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc, pH of 6.5-9.0
Impoundment 17	6.2	N/A (Approx 69,300 CY Remaining)	Storage of primary sludge from settlement of lime-neutralized effluent from on-site wastewater treatment	Being addressed as part of this Proposed Plan	acetone, toluene, ethylbenzene, and xylene, chlorobenzene, 1,2,4- trichlorobenzene, benzo(a)anthracene, bis(2-ethyl hexyl)phthalate, naphthalene, n-nitrosodiphenylamine, chromium, copper, lead, nickel, zinc. pH of 7-8
Impoundment 24	3.2	N/A (Approx 65,000 CY Remaining)	Storage of lime for primary treatment and, later, storage for sludges and general plant wastes	Being addressed as part of this Proposed Plan	acetone, chlorobenzene, methylene chloride, toluene, xylene, dibenzofuran, 1,2-dichlorobenzene, 2-methylnaphthalene, naphthalene, arsenic, chromium, copper, iron, lead, nickel, pH of 7-12.7

Table 1D: Summary of CERCLA Impoundments with Remediation Completed					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** ***Please note that this list may not be exhaustive**
Impoundment 11	2.6	25,000 CY	Disposal of sludges, furnace ash, and klinkers	Remediation completed; Closed with No Further Action per remedy selected in 1993 OU-1 ROD. Impoundment material removed and placed in Impoundment 8.	acetone, ethylbenzene, chlorobenzene, methylene chloride, toluene, xylenes, acenaphthalene, benzo(a)anthracene, fluorene, naphthalene, 2-methylnaphthalene, chromium, copper, lead, mercury, nickel, zinc
Impoundment 14	0.9	7,200 CY	Storage of organic tars	Remediation completed; Closed with No Further Action per remedy selected in 1998 OU-3 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methylnaphthalene, 1,2-dichlorobenzene, antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, zinc
Impoundment 18	15.4	217,000 CY	Storage of primary sludge from settlement of lime-neutralized effluent from on-site wastewater treatment	Remediation completed; Closed with No Further Action per remedy selected in 1996 OU-2 ROD	acetone, chlorobenzene, 2-methylnaphthalene, naphthalene, 4-chloroaniline, acenaphthalene, benzo(a)anthracene, phenanthrene, bis(2-ethyl hexyl)phthalate, fluorene, arsenic, chromium, copper, lead, zinc
Impoundment 19	2.3	12,000 CY	Storage of lime for use in wastewater treatment	Remediation completed; Closed with No Further Action per remedy selected in 1993 OU-1 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, ethylbenzene, chlorobenzene, methylene chloride, toluene, xylenes, 1,2-dichlorobenzene, 2-methylnaphthalene, naphthalene, 1,2,4- trichlorobenzene, arsenic, chromium, copper, iron, lead, magnesium, nickel
Impoundment 20	1.0	12,100 CY	Settling basin for on-site treatment of dye and pigment operation wastewater	Remediation completed; Closed with No Further Action per remedy selected in 1998 OU-3 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, lead, cyanide, mercury, nickel, selenium, silver, vanadium, zinc
Impoundment 26	2.3	22,000 CY	Storage of organic tars and, later, construction material, general plant debris and fill material	Remediation completed; Closed with No Further Action per remedy selected in 1998 OU-3 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, zinc

Table 1E: Summary of CERCLA Impoundments with No Remediation Required					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** ***Please note that this list may not be exhaustive**
Impoundment 9	-	No Remediation Required	Never Used	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 10	-	No Remediation Required	Never Used	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 12	-	No Remediation Required	Never Used	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 21	-	No Remediation Required	Contains emergency fire water	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 22	-	No Remediation Required	Previously contained emergency fire water	No remediation required based on 1990 Impoundment Characterization Program; Impoundment was backfilled with clean fill	-
Impoundment 23	-	No Remediation Required	Previously used to collect river sediment from the facility's former river water treatment plant	No remediation required based on 1990 Impoundment Characterization Program	-

Table 1F: Summary of Impoundments Addressed under RCRA					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** ***Please note that this list may not be exhaustive**
Lagoon 6	5.5	113,500 CY	RCRA impoundment; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA. Waste in Lagoon 6has been removed, solidified, and placed in the Impoundment 8 Facility.	NA
Lagoon 7	20.9	241,400 CY	RCRA impoundment; in the process of being closed in accordance with approved RCRA closure plan	Remediation partially completed; Approx. 95% of waste in Lagoon 7 has been removed, solidified, and placed in the Impoundment 8 Facility.	NA
Lagoon 8	11.5	60.8 MG	RCRA impoundment; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA. Waste in Impoundment 8 [Old] has been removed, solidified, and placed in the Impoundment 8 Facility.	NA for Lagoon 8 (Old); Impoundment 8 Facility COCs: chloroform, tetrachloroethene, trichloroethene
Lagoon 9A	4.1	52,900 CY	RCRA impoundments; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA; Impoundment 9A (plant effluent sludge) was closed in-place by installing a double synthetic liner capping system	chloroform, 1,1-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, tetrachloroethene, trichloroethene, 1,1,1-trichloroethane, carbon tetrachloride, iron, manganese
Impoundment 25	0.2	1,600 CY	RCRA impoundments; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA Effluent Collection Basin for Plant Effluent (sludge removed and closed in 1988 with NJDEP approval)	NA

Table 2A: Contaminants of Concern for Impoundment Contents			
Parameter	**Minimum (mg/kg)**	**Maximum (mg/kg)**	**Mean (mg/kg)**
Impoundment 3			
Benzene	130	36,000	15,458
Toluene	1,300	9,100	5,297
Xylene	370	2,300	1,393
2-Methylnapthalene	484	1,700	1,092
Naphthalene	890	24,000	9,325
Nitrobenzene	4.7	530	295
n-Nitrosodiphenylamine	69.5	1,800	790
pH (S.U.)	4.3	8.6	N/A
Impoundment 4			
Benzene	20	21,000	10,510
Toluene	6.1	3,100	1,553
Xylene	2.3	1,000	501
1,2- Dichlorobenzene	0.1	170	85
Naphthalene	14	41	27.5
pH (S.U.)	1.3	3.3	N/A
Impoundment 5			
Benzene	2.8	7,200	961
Toluene	3	14,000	2,011
Xylene	4.8	7,000	1,220
1,2- Dichlorobenzene	4.7	30,000	2,062
2-Methylnapthalene	4.7	12,000	3,215
Naphthalene	23	240,000	33,977
Nitrobenzene	4.7	75,000	9,206
n-Nitrosodiphenylamine	1.6	30,000	2,383
pH (S.U.)	3.7	9.9	N/A
Impoundment 13			
Benzene	0.008	10.2	2.2
Toluene	0.008	8.6	2.2
Xylene	0.007	56	8.8
1,2- Dichlorobenzene	0.089	99	29
2-Methylnapthalene	0.12	870	113
Naphthalene	0.1	9,300	958
Nitrobenzene	0.07	588	85
n-Nitrosodiphenylamine	0.12	610	99
pH (S.U.)	6.5	9.3	N/A
Impoundment 17			
Benzene	0.004	1	0.28
Toluene	0.004	4.4	0.811
Xylene	0.02	38	7.96
1,2- Dichlorobenzene	3.8	143	103
2-Methylnapthalene	4.7	125	54.5
Naphthalene	3.3	300	63
n-Nitrosodiphenylamine	12	180	52.5

pH (S.U.)	7.1	8.6	N/A
Impoundment 24			
Benzene	0.008	89.5	11.5
Toluene	0.002	13	3.5
Xylene	0.007	70	8.6
1,2- Dichlorobenzene	0.575	13,000	1,273
2-Methylnapthalene	0.575	56	22
Naphthalene	0.3	8,800	949
Nitrobenzene	0.575	76	30
n-Nitrosodiphenylamine	0.575	1,200	200
pH (S.U.)	7.7	12.7	N/A
Notes: N/A – Not applicable This list is not inclusive; additional COCs may not be included on this list. Some contaminant concentrations may not have been detected due to high method detection limits.			

Table 2B: Contaminants of Concern for North Area Soils						
Parameter	**Number of Detects**			**Range of Detects**		**Mean of Detects (mg/kg)**
				Min (mg/kg)	**Max (mg/kg)**	
Subsurface Samples						
Volatile Organic Compounds						
1,1,1-Trichloroethane	6	of	291	0.007	180	30
1,1,2,2-Tetrachloroethane	1	of	137	0.47	0.47	0.47
1,1,2-Trichloroethane	3	of	137	0.044	0.36	0.15
1,2-Dichloroethane	3	of	195	0.16	4.75	2.0
1,2-Dichloropropane	1	of	137	0.22	0.22	0.22
1,3,5-Trimethylbenzene	1	of	9	8.36	8.36	8.36
2-Butanone	16	of	291	0.045	1700	130
2-Hexanone	5	of	291	0.009	0.92	0.4
4-Methyl-2-Pentanone	74	of	291	0.005	1.25	0.1
Acetone	164	of	290	0.005	600	5
Benzene	127	of	291	0.00048	23000	461
Bromoform	7	of	291	0.006	9.2	1.4
Bromomethane	1	of	195	0.21	0.21	0.21
Carbon Disulfide	20	of	291	0.005	35	3.4
Chlorobenzene	113	of	291	0.00048	4000	69
Chloroform	8	of	291	0.006	27	4.0
cis-1,2-Dichloropropene	1	of	128	0.32	0.32	0.32
Cyclohexane	1	of	9	0.189	0.189	0.189
Dibromochloromethane	1	of	128	0.2	0.2	0.2
Ethylbenzene	82	of	291	0.005	530	28
Isopropylbenzene	1	of	9	0.266	0.266	0.266
m,p-Xylene	2	of	9	0.00073	117	58.5
Methylene Chloride	167	of	291	0.005	45	1.5
o-Xylene	1	of	9	27.5	27.5	27.5
Styrene	8	of	291	0.31	400	103
Tetrachloroethylene	16	of	291	0.005	1.7	0.2
Toluene	130	of	291	0.005	6400	156
trans-1,2-Dichloroethene	1	of	184	0.005	0.005	0.005
Trichloroethylene	3	of	291	0.23	300	105
Xylene (Total)	111	of	291	0.00099	2500	157
Semivolatile Organic Compounds						
1,1-Biphenyl	2	of	9	0.0426	0.215	0.129
1,2,4-Trichlorobenzene	40	of	291	0.013	100	6.6
1,2-Dichlorobenzene	108	of	291	0.0042	19000	371
1,2-Diphenylhydrazine	3	of	9	0.115	25.3	8.53
1,3-Dichlorobenzene	33	of	302	0.0011	23	1.6
1,4-Dichlorobenzene	59	of	302	0.0033	290	15.7
2,4-Dichlorophenol	2	of	195	0.021	0.07	0.05

2,4-Dimethylphenol	33	of	291	0.014	360	18.5
2,4-Dinitrotoluene	6	of	199	0.006	5.4	2.0
2,6-Dinitrotoluene	10	of	291	0.024	66	8.1
2-Chloronaphthalene	19	of	291	0.009	55	3.7
2-Chlorophenol	11	of	291	0.02	1	0.17
2-Methylnaphthalene	139	of	291	0.005	3200	49
2-Methylphenol	33	of	291	0.014	120	5.5
2-Nitroaniline	1	of	195	0.15	0.15	0.15
2-Nitrophenol	2	of	195	0.008	72	36
3 & 4-Methylphenol	8	of	30	0.18	18.4	4.6
3-Nitroaniline	1	of	195	0.13	0.13	0.13
4-Chloro-3-Methyl Phenol	5	of	137	0.1	180	54
4-Chloroaniline	18	of	291	0.044	45	3.7
4-Methylphenol	27	of	261	0.014	170	9.3
4-Nitroaniline	15	of	287	0.016	390	68
4-Nitrophenol	6	of	142	0.14	44	11
Acenaphthene	85	of	291	0.009	630	17.8
Acenaphthylene	44	of	291	0.009	14	1.7
Acetophenone	2	of	9	0.025	0.667	0.35
Aniline	20	of	32	0.0788	110000	6826
Anthracene	93	of	291	0.007	430	8
Benzo(a)anthracene	87	of	291	0.009	44.6	3
Benzidine	1	of	9	0.227	0.227	0.227
Benzo(a)pyrene	64	of	291	0.01	32	1.3
Benzo(b)fluoranthene	74	of	291	0.004	59	1.7
Benzo(g,h,i) perylene	31	of	291	0.005	6.9	0.9
Benzo(k)fluoranthene	60	of	291	0.005	7.31	0.7
Benzoic Acid	20	of	265	0.048	6.9	1.08
Benzyl Alcohol	7	of	265	0.042	740	153
bis(2-Ethylhexyl)phthalate	129	of	291	0.005	77	1.5
Butyl benzyl phthalate	15	of	291	0.005	20	1.7
Carbazole	11	of	49	0.0317	29	3.0
Chrysene	92	of	291	0.01	87	2.4
Dibenzo(a,h)anthracene	14	of	291	0.0138	3.8	0.7
Dibenzofuran	102	of	291	0.006	410	12.7
Diethyl Phthalate	42	of	291	0.007	43	1.2
Dimethyl Phthalate	6	of	291	0.097	2.4	0.72
di-n-Butyl Phthalate	46	of	291	0.005	10	0.8
di-n-Octyl Phthalate	28	of	289	0.005	76	3.4
Fluoranthene	140	of	291	0.005	98	3.7
Fluorene	97	of	291	0.008	7200	90
Hexachlorocyclopentadiene	3	of	40	820	1100	1007
Indeno(1,2,3-Cd)Pyrene	33	of	291	0.004	9.1	0.9
Isophorone	2	of	289	0.18	48	24

Methylcyclohexane	1	of	9	0.904	0.904	0.904
Naphthalene	194	of	291	0.005	21000	422
Nitrobenzene	72	of	291	0.01	2500	136
N-Nitrosodiphenylamine	95	of	277	0.013	200	12
N-Nitrosodipropylamine	8	of	46	0.13	9.7	3.2
o-Toluidine	3	of	9	0.422	1.24	0.802
Pentachlorophenol	6	of	137	0.033	53	12
Phenanthrene	160	of	291	0.004	600	12
Phenol	24	of	291	0.19	120	10
Pyrene	128	of	291	0.005	71	2.6
PCBs						
Aroclor-1242	3	of	111	0.17	5.6	2.3
Aroclor-1248	5	of	168	0.16	67	14
Aroclor-1254	41	of	256	0.038	120	4.3
Aroclor-1260	10	of	111	0.6	33	5.3
Total PCB	54	of	258	0.038	153	5.6
Inorganics						
Aluminum	291	of	291	20	107000	10,858
Antimony	235	of	291	2.8	90200	389
Arsenic	289	of	291	0.37	14000	61
Barium	286	of	291	3.6	9060	222
Beryllium	265	of	291	0.17	4.5	0.9
Cadmium	247	of	291	0.1	224	2.4
Calcium	284	of	291	25.3	69100	3,405
Chloride	1	of	9	79	79	79
Chromium	287	of	291	1.9	216000	1,697
Cobalt	278	of	291	0.76	13500	101
Copper	291	of	291	1.8	43900	943
Cyanide	232	of	254	0.51	68.5	2.2
Iron	291	of	291	12	590000	52,956
Lead	291	of	291	0.16	3240	161
Magnesium	283	of	291	16	23300	3,578
Manganese	290	of	291	1.8	7665	501
Mercury	265	of	291	0.04	374	4.6
Nickel	289	of	291	0.82	5140	107
Potassium	273	of	291	9.3	8440	1,004
Selenium	261	of	285	0.08	35	1.5
Silver	237	of	291	0.68	38.1	1.4
Sodium	272	of	291	62.6	90800	1,182
Thallium	250	of	291	0.038	15	0.7
Total Phenolics	4	of	9	3.1	15.7	6.8
Vanadium	282	of	291	1	271	40
Zinc	291	of	291	2.3	48000	832
Surface Samples						

Volatile Organic Compounds						
1,1,1-Trichloroethane	19	of	144	0.006	0.06	0.02
1,1-Dichloroethene	7	of	98	0.005	0.01	0.01
1,2-Dichloroethene	1	of	99	0.006	0.006	0.006
2-Butanone	1	of	55	2.2	2.2	2.2
2-Hexanone	1	of	55	0.35	0.35	0.35
4-Methyl-2-Pentanone	9	of	144	0.005	0.019	0.01
Acetone	94	of	144	0.005	7.6	0.19
Benzene	31	of	144	0.005	3.8	0.28
Bromoform	1	of	99	0.075	0.075	0.075
Carbon Disulfide	2	of	99	0.005	0.008	0.007
Carbon Tetrachloride	2	of	99	0.005	0.007	0.006
Chlorobenzene	22	of	144	0.009	130	11
Chloroform	4	of	144	0.005	0.69	0.18
Chloromethane	1	of	99	0.012	0.012	0.012
Ethylbenzene	16	of	144	0.006	1500	102
Methylene Chloride	99	of	144	0.005	0.92	0.03
Styrene	1	of	99	5.6	5.6	5.6
Tetrachloroethene	18	of	144	0.005	2.4	0.16
Toluene	48	of	144	0.005	580	36
Trichloroethylene	1	of	99	80	80	80
Xylene (Total)	29	of	144	0.005	13000	553
Semivolatile Organic Compounds						
1,1-Biphenyl	3	of	10	0.0169	0.121	0.064
1,2,4-Trichlorobenzene	64	of	144	0.011	85	3.2
1,2-Dichlorobenzene	81	of	144	0.012	58	2.8
1,2-Diphenylhydrazine	2	of	10	0.0649	0.162	0.113
1,3-Dichlorobenzene	17	of	144	0.008	1.5	0.3
1,4-Dichlorobenzene	29	of	144	0.012	5	0.6
2,4,5-Trichlorophenol	1	of	55	0.36	0.36	0.36
2,4-Dichlorophenol	6	of	144	0.05	0.2	0.1
2,4-Dimethylphenol	3	of	144	0.026	0.0867	0.055
2,4-Dinitrophenol	5	of	144	0.033	2.9	1.0
2,4-Dinitrotoluene	2	of	55	0.35	0.96	0.66
2,6-Dinitrotoluene	1	of	55	0.15	0.15	0.15
2-Chloronaphthalene	17	of	144	0.019	17	2.2
2-Chlorophenol	7	of	144	0.008	0.55	0.1
2-Methylnaphthalene	108	of	144	0.007	150	3.3
2-Methylphenol	7	of	144	0.036	0.22	0.099
2-Nitroaniline	1	of	99	0.017	0.017	0.017
3 & 4-Methylphenol	1	of	10	0.0704	0.0704	0.0704
3-Nitroaniline	1	of	98	4.9	4.9	4.9
4-Chloroaniline	6	of	144	0.016	22	4.1
4-Chlorophenyl-Phenyl Ether	1	of	51	0.023	0.023	0.023

4-Methylphenol	9	of	134	0.055	7.7	1.1
4-Nitroaniline	3	of	99	0.019	4.2	2.7
Acenaphthene	87	of	144	0.014	57	2.5
Acenaphthylene	41	of	144	0.009	3.6	0.3
Acetophenone	1	of	10	0.166	0.166	0.166
Aniline	4	of	10	0.0455	2.29	1.06
Anthracene	75	of	144	0.026	95	2.7
Benz(a)anthracene	130	of	165	0.043	1300	77
Benzo(a)pyrene	75	of	149	0.0576	91	6.3
Benzo(b)fluoranthene	85	of	144	0.011	48	2.4
Benzo(g,h,i)perylene	48	of	144	0.0394	24	1.7
Benzo(k)fluoranthene	65	of	144	0.0437	60	2.7
Benzoic Acid	13	of	144	0.018	1.4	0.33
Benzyl Alcohol	2	of	144	0.085	1.6	0.84
bis(2-Ethylhexyl)phthalate	79	of	144	0.028	7.4	1.2
Butyl benzyl phthalate	5	of	144	0.045	0.331	0.173
Carbazole	8	of	14	0.055	6	1.2
Chrysene	90	of	140	0.033	71	3.2
Dibenzo(a,h)Anthracene	19	of	144	0.0207	4.35	1.04
Dibenzofuran	89	of	144	0.011	46	2.7
Diethyl Phthalate	28	of	144	0.008	1.6	0.21
Dimethyl Phthalate	10	of	144	0.027	2.9	0.55
di-n-Butyl Phthalate	42	of	144	0.012	6.6	0.39
di-n-Octyl Phthalate	4	of	144	0.051	4.8	1.6
Fluoranthene	119	of	144	0.029	210	5.5
Fluorene	71	of	144	0.015	46	2.2
Hexachlorobenzene	18	of	144	0.016	7	1.2
Hexachloroethane	2	of	144	0.027	1.4	0.7
Indeno(1,2,3-Cd)Pyrene	50	of	144	0.029	24	1.9
Naphthalene	129	of	144	0.015	290	13
Nitrobenzene	80	of	144	0.014	600	16
N-Nitrosodiphenylamine	96	of	144	0.0278	200	14
Pentachlorophenol	1	of	97	0.28	0.28	0.28
Phenanthrene	119	of	144	0.03	240	4.9
Phenol	2	of	10	0.0818	0.0906	0.0862
Pyrene	118	of	144	0.026	140	4.2
PCBs						
Aroclor-1242	12	of	134	0.26	180	18
Aroclor-1254	50	of	134	0.19	160	6.1
Aroclor-1260	3	of	134	0.46	0.58	0.51
Total PCB	137	of	226	0.0619	560	31
Inorganics						
Aluminum	144	of	144	141	18700	7,752
Antimony	135	of	144	1.5	17	3.5

Arsenic	143	of	144	0.55	104	15.8
Barium	143	of	144	7	4120	245
Beryllium	140	of	144	0.16	3.8	0.65
Cadmium	140	of	144	0.216	29.3	1.3
Calcium	142	of	144	18.9	42600	4,417
Chromium	206	of	206	7.7	214000	24,278
Cobalt	144	of	144	0.77	912	17.1575
Copper	144	of	144	1.71	22500	1,146
Cyanide	135	of	144	0.57	27.9	2.2
Iron	144	of	144	19	578000	55,290
Lead	144	of	144	6.7	1470	188
Magnesium	142	of	144	15.7	20300	3,670
Manganese	144	of	144	27.9	2070	431
Mercury	144	of	144	0.094	94.8	3.6
Nickel	144	of	144	4.2	1300	85
Potassium	137	of	144	92.9	3550	748
Selenium	136	of	144	0.09	29.4	0.99
Silver	135	of	144	0.66	2.2	1.03
Sodium	134	of	144	70.9	10100	487
Thallium	134	of	144	0.24	1.57	0.56
Total Phenolics	3	of	10	4.9	19.2	9.8
Vanadium	144	of	144	1	260	39
Zinc	144	of	144	8.9	50100	1,105

Notes:
This list is not inclusive; additional COCs may not be included on this list.
Some contaminant concentrations may not have been detected due to high method detection limits.

Table 2C: Contaminants of Concern for South & West Area Soils						
Parameter	**Number of Detects**			**Range of Detects**		**Mean of Detects (mg/kg)**
				Min (mg/kg)	**Max (mg/kg)**	
Subsurface Samples						
Volatile Organic Compounds						
1,1,1-Trichloroethane	1	of	134	0.13	0.13	0.13
2-Butanone	13	of	134	0.0142	47	3.7
Acetone	49	of	136	0.005	2.3	0.37
Benzene	96	of	136	0.00092	13000	139.69
Carbon Disulfide	5	of	125	0.0047	0.28	0.11
Chlorobenzene	107	of	134	0.0015	250	8.65
Chloroform	4	of	136	0.11	0.66	0.26
Ethylbenzene	77	of	136	0.00096	63	2.93
Methylene Chloride	11	of	136	0.008	230	21.4
Tetrachloroethene	1	of	125	0.21	0.21	0.21
Toluene	77	of	136	0.00048	4000	58.2
Xylenes (total)	89	of	136	0.0038	1000	26.1
Semi-Volatile Organic Compounds						
1,2,4-Trichlorobenzene	47	of	136	0.029	120	7.16
1,2-Dichlorobenzene	70	of	136	0.0428	830	14.0
1,3-Dichlorobenzene	6	of	134	0.0794	0.3	0.14
1,4-Dichlorobenzene	35	of	136	0.016	2.4	0.46
2,4-Dimethylphenol	25	of	127	0.022	0.33	0.11
2-Chloronaphthalene	18	of	125	0.039	91	10.3
2-Methylnaphthalene	91	of	136	0.0173	490	24.9
2-Methylphenol	26	of	127	0.037	0.23	0.08
3 & 4-Methylphenol	34	of	80	0.1262	2.216	0.5355
4-Chloroaniline	1	of	136	0.3	0.3	0.3
4-Chlorophenyl Phenyl Ether	7	of	125	0.046	0.61	0.24
4-Nitroaniline	3	of	136	0.074	0.39	0.19
Acenaphthene	68	of	136	0.022	98	5.52
Acenaphthylene	11	of	127	0.25	5.7	1.13
Anthracene	47	of	136	0.025	55	2.78
Benzo(a)anthracene	47	of	127	0.026	14	1.92
Benzo(a)pyrene	18	of	136	0.043	1.8	0.27
Benzo(b)fluoranthene	25	of	136	0.025	1.8	0.24
Benzo(g,h,I)perylene	6	of	127	0.041	0.26	0.11
Benzo(k)fluoranthene	21	of	136	0.022	2.3	0.32
Benzoic Acid	9	of	55	0.0821	3.5	1.00
bis(2-Ethylhexyl)phthalate	45	of	136	0.016	2	0.14
Carbazole	10	of	79	0.047	3.8	0.99
Chrysene	33	of	136	0.024	2.5	0.29
Dibenzo(a,h)anthracene	2	of	125	0.051	0.17	0.11

Dibenzofuran	63	of	136	0.011	90	5.5
Diethyl Phthalate	4	of	125	0.062	0.38	0.15
di-n-Butyl Phthalate	24	of	136	0.029	1.3	0.16
di-n-Octylphthalate	2	of	134	0.036	0.051	0.04
Fluoranthene	50	of	136	0.048	15	1.2
Fluorene	55	of	136	0.014	110	9.9
Indeno(1,2,3-cd)pyrene	6	of	127	0.045	0.36	0.13
Isophorone	1	of	134	530	530	530
Naphthalene	122	of	136	0.0637	5900	154.5
Nitrobenzene	7	of	127	0.044	3.3	0.62
n-Nitroso-di-n-Propylamine	1	of	125	0.0262	0.0262	0.0262
N-Nitrosodiphenylamine(1)	52	of	136	0.012	160	11.1
Phenanthrene	60	of	136	0.0284	82	5.31
Phenol	18	of	125	0.096	0.9	0.38
Pyrene	48	of	136	0.032	5.6	0.61
Inorganics						
Aluminum	135	of	136	250	23800	14038
Antimony	14	of	136	0.88	23.5	7.8
Arsenic	136	of	136	1	125	6
Barium	136	of	136	7.3	1050	158
Beryllium	130	of	136	0.13	2.7	1.1
Cadmium	34	of	136	0.06	5.2	0.92
Calcium	125	of	136	50.3	260000	3971
Chromium	134	of	136	2.8	127000	1025
Cobalt	134	of	136	2.5	377	15.1
Copper	135	of	136	3.8	3970	109
Cyanide	11	of	33	0.5	1.9	1.1
Iron	135	of	136	2300	532000	38787
Lead	101	of	136	1.2	4900	106
Magnesium	136	of	136	275	29000	3940
Manganese	136	of	136	50.8	2850	550
Mercury	46	of	136	0.048	3.7	0.76
Nickel	136	of	136	8.2	904	42
Potassium	99	of	136	173	7630	965
Selenium	38	of	134	0.13	10.5	1.4
Silver	38	of	134	0.13	2.5	0.90
Sodium	90	of	133	51	29300	655
Thallium	32	of	134	0.21	6.4	1.5
Vanadium	135	of	136	3.2	112	38
Zinc	135	of	136	23.4	1250	89.0
PCBs						
Total PCBs	14	of	33	0.182	8.8	1.7
Surface Samples						
Volatile Organic Compounds						

2-Hexanone	1	of	41	0.007	0.007	0.007
4-Methyl-2-Pentanone	1	of	42	0.006	0.006	0.006
Acetone	7	of	42	0.006	0.026	0.013
Benzene	8	of	42	0.006	13800	1760
Ethylbenzene	1	of	32	65.9	65.9	65.9
Methylene Chloride	8	of	42	0.005	15.9	2.55
Toluene	14	of	42	0.005	1080	159
Xylenes (total)	6	of	42	0.006	793	149
Semi-volatile Organic Compounds						
1,2,4-Trichlorobenzene	7	of	42	0.019	4770	688
1,2-Dichlorobenzene	8	of	42	0.015	4700	697
1,3-Dichlorobenzene	2	of	42	0.15	428	214.1
1,4-Dichlorobenzene	4	of	42	0.009	1640	442
2-Methylnaphthalene	11	of	42	0.033	124	37.1
3 & 4-Methylphenol	3	of	30	64.1	345	181
Acenaphthene	10	of	42	0.024	116	38.5
Acenaphthylene	4	of	42	0.33	47.1	22
Anthracene	19	of	42	0.025	244	52.7
Benzo(a)anthracene	32	of	42	0.2	5050	296
Benzo(a)pyrene	22	of	42	0.19	893	146
Benzo(b)fluoranthene	23	of	42	0.12	904	140
Benzo(g,h,I)perylene	14	of	32	39.1	469	124
Benzo(k)fluoranthene	20	of	42	0.27	844	165
Benzo[ghi]fluoranthene	1	of	10	0.53	0.53	0.53
bis(2-Ethylhexyl)phthalate	25	of	42	0.048	18500	1147
Carbazole	2	of	32	116	154	135
Chrysene	29	of	42	0.26	984	140
Dibenzo(a,h)anthracene	1	of	30	127	127	127
Dibenzofuran	6	of	42	0.015	81.9	15.7
Diethyl Phthalate	2	of	42	0.029	47.5	23.8
Dimethyl Phthalate	1	of	30	1770	1770	1770
Fluoranthene	37	of	42	0.062	2040	208
Fluorene	3	of	42	0.018	130	44
Hexachlorobenzene	1	of	42	0.23	0.23	0.23
Indeno(1,2,3-cd)pyrene	14	of	32	35.7	452	116
Naphthalene	16	of	42	0.015	3000	344
Nitrobenzene	7	of	42	0.028	837	123
N-Nitrosodiphenylamine(1)	11	of	42	0.035	6840	866
Phenanthrene	32	of	42	0.027	1140	114
Pyrene	38	of	42	0.069	1540	188
Inorganics						
Aluminum	42	of	42	253	30300	16444
Antimony	10	of	42	3.1	21.6	6.3
Arsenic	54	of	54	2.6	90.4	25

Barium	41	of	42	5.9	1670	345
Beryllium	29	of	42	0.19	3.1	1.4
Cadmium	20	of	42	0.29	7.3	1.4
Calcium	36	of	42	71	6980	2144
Chromium	42	of	42	28.4	23200	796
Cobalt	37	of	42	4.8	67.3	19
Copper	42	of	42	27.1	3820	614
Cyanide	10	of	40	1.2	6.2	1.9
Iron	42	of	42	17800	597000	116819
Magnesium	40	of	42	73.8	7230	3993
Manganese	42	of	42	48	2700	796
Mercury	39	of	42	0.056	109	5.04
Nickel	42	of	42	15.7	1270	190.9
Potassium	38	of	42	99.9	2980	1518
Selenium	10	of	42	0.13	2.7	0.645
Silver	19	of	42	0.88	13.8	6.2
Sodium	10	of	42	67.7	256	178.9
Thallium	11	of	42	0.31	1.4	0.53
Vanadium	42	of	42	16.5	208	56.3
Zinc	41	of	41	41.8	831	191
PCBs						
Total PCBs	21	of	115	6230.99	23553.13	14855
Notes: This list is not inclusive; additional COCs may not be included on this list. Some contaminant concentrations may not have been detected due to high method detection limits.						

Table 2D: Contaminants of Concern for Overburden Groundwater						
Parameter	Number of Detects			Range of Detects		Mean of Detects (mg/l)
				Min (mg/l)	Max (mg/l)	
Volatile Organic Compounds						
1,1,1-Trichloroethane	1	of	568	0.00027	0.00027	0.00027
1,1-Dichloroethane	6	of	568	0.00068	0.0012	0.00091
1,2-Dichloroethane	27	of	568	0.00042	0.416	0.021
1,3,5-Trimethylbenzene	5	of	24	0.0036	0.062	0.030
2-Butanone	5	of	568	0.0481	6.32	2.03
4-Methyl-2-pentanone	10	of	568	0.021	0.0764	0.047
Acetone	89	of	568	0.0026	25	0.65
Benzene	317	of	568	0.00021	468	5.3
Carbon Disulfide	28	of	568	0.00045	0.0221	0.0047
Carbon Tetrachloride	1	of	568	0.0021	0.0021	0.0021
Chlorobenzene	427	of	570	0.00034	9.88	0.57
Chloroethane	10	of	568	0.0012	0.22	0.038
Chloroform	37	of	568	0.00025	0.223	0.019
Chloromethane	4	of	568	0.0024	0.537	0.16
cis-1,2-Dichloroethene	3	of	568	0.00027	0.00065	0.00044
Cyclohexane	2	of	24	0.0021	0.0123	0.0072
Ethyl Ether	3	of	24	0.0062	0.0908	0.060
Ethylbenzene	211	of	568	0.00018	0.696	0.054
Isopropylbenzene	5	of	24	0.00066	0.0181	0.0066
m,p-Xylene	16	of	24	0.0005	2.87	0.5
Methyl Cyclohexane	2	of	24	0.0019	0.007	0.004
Methylene Chloride	12	of	568	0.00042	0.095	0.015
o-Xylene	11	of	24	0.0168	0.921	0.224
Tetrachloroethene	12	of	568	0.00022	0.0314	0.0043
Toluene	220	of	568	0.00024	42.8	0.64
trans-1,2-Dichloroethene	1	of	568	0.00097	0.00097	0.00097
Trichloroethene	21	of	568	0.00039	0.011	0.0019
Xylene (Total)	221	of	568	0.0003	3.8	0.2
Semi-Volatile Organic Compounds						
1,1'-Biphenyl	6	of	25	0.0016	0.0238	0.0119167
1,2,4-Trichlorobenzene	200	of	507	0.00048	0.855	0.0371746
1,2-Dichlorobenzene	297	of	507	0.0005	5.92	0.3214989
1,3-Dichlorobenzene	168	of	507	0.00035	0.381	0.0319006
1,4-Dichlorobenzene	225	of	508	0.0005	0.767	0.0625301
2,4,5-Trichlorophenol	14	of	508	0.0015	0.0122	0.0070714
2,4,6-Trichlorophenol	9	of	508	0.0012	0.12	0.0199

2,4-Dichlorophenol	22	of	508	0.0013	0.156	0.0130318
2,4-Dimethylphenol	148	of	507	0.00049	13.7	0.3873889
2,4-Dinitrophenol	2	of	508	0.0191	0.191	0.10505
2-Chloroaniline	6	of	25	0.0072	0.0942	0.05825
2-Chloronaphthalene	111	of	507	0.00053	0.385	0.0227209
2-Chlorophenol	16	of	508	0.0011	0.11	0.00935
2-Methylnaphthalene	121	of	508	0.00033	1.8	0.1141796
2-Methylphenol	106	of	508	0.0007	7.85	0.2938245
3 & 4-Methylphenol	96	of	508	0.00041	23.7	0.9836425
3-Nitroaniline	1	of	507	0.0014	0.0014	0.0014
4-Aminobiphenyl	1	of	25	0.0015	0.0015	0.0015
4-Chloroaniline	51	of	507	0.00055	0.805	0.1079224
4-Nitrophenol	2	of	508	0.0473	0.473	0.26015
Acenaphthene	244	of	507	0.000221	0.304	0.0277355
Acenaphthylene	20	of	507	0.000217	0.0041	0.0019643
Acetophenone	14	of	25	0.00057	2.01	0.3847393
Aniline	195	of	453	0.00043	175	2.3433878
Anthracene	59	of	507	0.000163	0.087	0.0051499
Benzaldehyde	1	of	25	0.0053	0.0053	0.0053
Benzidine	5	of	25	0.0094	0.021	0.01684
Benzo(a)Anthracene	2	of	507	0.00038	0.00346	0.00192
Benzo(b)Fluoranthene.	1	of	484	0.000773	0.000773	0.000773
Benzo(g,h,i)Perylene	1	of	507	0.0032	0.0032	0.0032
Benzo(k)Fluoranthene	1	of	484	0.000253	0.000253	0.000253
Benzoic acid	22	of	153	0.0013	0.978	0.21975
Benzyl Alcohol	2	of	153	0.0056	0.0069	0.00625
bis(2-Ethylhexyl)Phthalate	118	of	507	0.00058	0.46	0.0235689
Butyl Benzyl Phthalate	2	of	507	0.00061	0.0073	0.003955
Carbazole	70	of	461	0.0021	0.185	0.0179256
Chrysene	1	of	507	0.00031	0.00031	0.00031
Dibenzofuran	204	of	507	0.00063	0.486	0.0210537
Diethyl Phthalate	10	of	507	0.00064	0.0118	0.004324
Dimethyl Phthalate	27	of	507	0.0011	2.17	0.1704593
di-n-Butyl Phthalate	10	of	507	0.00045	0.0054	0.002058
Fluoranthene	8	of	507	0.000234	0.00326	0.0010036
Fluorene	173	of	507	0.000224	0.086	0.0076325
Indeno(1,2,3-Cd)Pyrene	1	of	507	0.00032	0.00032	0.00032
Isophorone	15	of	507	0.00055	0.018	0.0044067
Methylcyclohexane	2	of	25	0.0019	0.007	0.00445
Naphthalene	271	of	508	0.000196	49.9	2.0524902
Nitrobenzene	13	of	507	0.0026	5.72	0.9274077
n-Nitrosodiphenylamine	280	of	507	0.00058	2.46	0.1394322

o-Toluidine	10	of	25	0.0014	15.6	2.37731
Pentachlorophenol	14	of	505	0.0015	0.228	0.0268036
Phenanthrene	116	of	507	0.00028	0.088	0.0037635
Phenol	61	of	507	0.002	16.4	0.924982
Pyrene	6	of	505	0.000222	0.00277	0.000917
Salicylic acid	1	of	25	0.0521	0.0521	0.0521
Inorganic Compounds						
Aluminum	30	of	175	0.213	269	29.5
Antimony	20	of	175	0.005	0.114	0.02
Arsenic	466	of	570	0.00194	0.637	0.0340
Barium	10	of	407	0.208	3.86	1.49
Beryllium	18	of	175	0.0011	0.0259	0.0089
Cadmium	11	of	491	0.0034	0.0141	0.0076
Calcium Metal	170	of	175	2.54	1180	82.2
Chromium	48	of	429	0.0101	1.12	0.0982
Cobalt	6	of	175	0.0578	0.177	0.123
Copper	31	of	407	0.0167	5.4	0.26
Cyanide	6	of	193	0.1	0.14	0.1
Iron	376	of	410	0.106	4830	84.7
Lead	30	of	407	0.0032	0.229	0.028
Magnesium	181	of	185	3.13	989	69.7
Manganese	399	of	400	0.0448	310	11.8
Mercury	16	of	407	0.00021	0.0044	0.00067
Nickel	20	of	175	0.0104	2.85	0.365
Potassium	55	of	164	5.32	132	18.9
Selenium	27	of	407	0.0051	0.172	0.023
Silver	1	of	407	0.0109	0.0109	0.0109
Sodium	170	of	175	2.97	1790	111
Thallium	13	of	175	0.0068	0.0281	0.014
Vanadium	7	of	174	0.05	0.336	0.2
Zinc	100	of	407	0.021	16.8	0.92

Notes:
This list is not inclusive; additional COCs may not be included on this list.
Some contaminant concentrations may not have been detected due to high method detection limits.

Table 2E: Contaminants of Concern for Bedrock Groundwater

Parameter	Number of Detects			Range of Detects		Mean of Detects (mg/l)
				Min (mg/l)	Max (mg/l)	
Volatile Organic Compounds						
1,1,1-Trichloroethane	81	of	1352	0.00015	0.0041	0.0019
1,1,2,2-Tetrachloroethane	2	of	1352	0.001	0.001	0.001
1,1,2-Trichloroethane	2	of	1352	0.001	0.001	0.001
1,1-Dichloroethane	72	of	1352	0.00013	0.0024	0.0012
1,1-Dichloroethene	96	of	1352	0.00062	0.0092	0.0041
1,2-Dichloroethane	36	of	1352	0.00018	0.0012	0.00060
1,2-Dichloropropane	8	of	1352	0.00027	0.001	0.0006
2-Butanone (MEK)	3	of	1352	0.005	0.0371	0.02
2-Hexanone	2	of	1352	0.005	0.005	0.005
4-Methyl-2-Pentanone (MIKB)	2	of	1352	0.005	0.005	0.005
Acetone	14	of	1352	0.002	0.106	0.02
Benzene	148	of	1352	0.0003	3.36	0.8
Bromodichloromethane	2	of	1352	0.001	0.001	0.001
Bromoform	2	of	1352	0.001	0.001	0.001
Bromomethane	2	of	1352	0.001	0.001	0.001
Carbon Disulfide	129	of	1352	0.00034	18.9	3.3
Carbon Tetrachloride	59	of	1352	0.00021	0.0283	0.015
Chlorobenzene	166	of	1352	0.00015	8.87	0.93
Chloroethane	2	of	1352	0.001	0.001	0.001
Chloroform	99	of	1352	0.00017	0.0078	0.0024
Chloromethane	2	of	1352	0.001	0.001	0.001
cis-1,2-Dichloroethene	162	of	1352	0.0002	0.257	0.04
cis-1,3-Dichloropropylene	2	of	1352	0.001	0.001	0.001
Dibromochloromethane	2	of	1352	0.001	0.001	0.001
Ethyl Ether	2	of	3	0.0143	0.0305	0.0224
Ethylbenzene	81	of	1352	0.00044	0.0524	0.0087
m,p-Xylene	3	of	3	0.0023	0.0233	0.011
Methylene Chloride	10	of	1352	0.00048	0.0078	0.0021
o-Xylene	2	of	3	0.0016	0.0201	0.011
Styrene (Monomer)	3	of	1352	0.002	0.002	0.002
Tetrachloroethene	260	of	1352	0.00024	0.0733	0.014
Toluene	102	of	1352	0.00011	0.0192	0.0049
trans-1,2-Dichloroethene	58	of	1352	0.00086	0.0086	0.0026
trans-1,3-Dichloropropylene	2	of	1352	0.001	0.001	0.001
Trichloroethene	171	of	1352	0.0002	0.0346	0.007
Vinyl Chloride	20	of	1352	0.00043	0.0043	0.0020
Xylenes (Total)	83	of	1352	0.00035	0.148	0.011

Semi volatile Organic Compounds						
1,1'-Biphenyl	1	of	6	0.0073	0.0073	0.0073
1,2,4-Trichlorobenzene	152	of	584	0.00041	0.572	0.12
1,2-Dichlorobenzene	112	of	584	0.00053	1.53	0.12
1,3-Dichlorobenzene	105	of	584	0.00058	0.37	0.13
1,4-Dichlorobenzene	104	of	584	0.00052	0.857	0.057
2,4,5-Trichlorophenol	1	of	588	0.002	0.002	0.002
2,4,6-Trichlorophenol	1	of	588	0.002	0.002	0.002
2,4-Dichlorophenol	2	of	588	0.00084	0.005	0.003
2,4-Dimethylphenol	9	of	588	0.0005	0.0502	0.008
2,4-Dinitrophenol	1	of	588	0.02	0.02	0.02
2,4-Dinitrotoluene	1	of	588	0.002	0.002	0.002
2,6-Dinitrotoluene	1	of	588	0.002	0.002	0.002
2-Chloroaniline	1	of	3	0.0087	0.0087	0.0087
2-Chloronaphthalene	36	of	588	0.00084	0.0031	0.0014
2-Chlorophenol	10	of	588	0.00059	0.005	0.002
2-Methylnaphthalene	107	of	588	0.00064	0.139	0.028
2-Methylphenol	3	of	588	0.002	0.0182	0.008
2-Nitroaniline	3	of	588	0.00061	0.005	0.004
2-Nitrophenol	2	of	588	0.002	0.005	0.004
3 & 4-Methylphenol	8	of	588	0.0007	0.0541	0.009
3,3'-Dichlorobenzidine	2	of	588	0.002	0.005	0.004
3-Nitroaniline	2	of	588	0.005	0.005	0.005
4,6-Dinitro-2-Methylphenol	1	of	588	0.01	0.01	0.01
4-Bromophenyl Phenyl Ether	1	of	588	0.002	0.002	0.002
4-chloro-3-Methyl Phenol	1	of	588	0.005	0.005	0.005
4-Chloroaniline	8	of	588	0.002	0.0529	0.01
4-Chlorophenyl Phenyl Ether	1	of	588	0.002	0.002	0.002
4-Nitroaniline	4	of	588	0.0013	0.005	0.002
4-Nitrophenol	1	of	588	0.02	0.02	0.02
Acenaphthene	109	of	588	0.00067	0.027	0.011
Acenaphthylene	88	of	588	0.000208	0.0073	0.0016
Aniline	100	of	509	0.00094	6.36	0.30
Anthracene	76	of	588	0.00016	0.002	0.0007
Benzo(A)Anthracene	2	of	588	0.000357	0.002	0.001
Benzo(A)Pyrene	2	of	588	0.001	0.002	0.002
Benzo(B)Fluoranthene.	3	of	588	0.00031	0.002	0.001
Benzo(G,H,I)Perylene	2	of	588	0.002	0.0024	0.002
Benzo(K)Fluoranthene	3	of	588	0.001	0.002	0.001
bis(2-Chloroethoxy)Methane	1	of	588	0.002	0.002	0.002
bis(2-Chloroethyl)Ether	1	of	588	0.002	0.002	0.002
Butyl Benzyl Phthalate	1	of	588	0.002	0.002	0.002
Carbazole	61	of	515	0.00054	0.0025	0.0014
Chrysene	2	of	588	0.000174	0.002	0.001

Dibenzo(A,H)Anthracene	2	of	588	0.0019	0.002	0.002
Dibenzofuran	80	of	588	0.0011	0.018	0.0065
Diethyl Phthalate	1	of	588	0.002	0.002	0.002
Dimethyl Phthalate	2	of	588	0.0014	0.002	0.002
di-n-Butyl Phthalate	10	of	588	0.00062	0.004	0.002
di-n-Octyl Phthalate	5	of	588	0.00088	0.004	0.002
Fluoranthene	8	of	588	0.000129	0.00245	0.0007708
Fluorene	106	of	588	0.00048	0.0117	0.0040
Hexachlorobenzene	1	of	588	0.002	0.002	0.002
Hexachlorobutadiene	1	of	162	0.002	0.002	0.002
Hexachlorocyclopentadiene	1	of	588	0.01	0.01	0.01
Hexachloroethane	1	of	588	0.005	0.005	0.005
Indeno(1,2,3-Cd)Pyrene	2	of	588	0.002	0.002	0.002
Isophorone	1	of	588	0.002	0.002	0.002
Naphthalene	128	of	588	0.000134	0.803	0.110
Nitrobenzene	75	of	588	0.002	0.0576	0.02
n-Nitroso-di-n-Propylamine	1	of	588	0.002	0.002	0.002
n-Nitrosodiphenylamine	99	of	588	0.00055	0.0774	0.0069
o-Toluidine	2	of	6	0.0963	0.178	0.137
Pentachlorophenol	1	of	588	0.01	0.01	0.01
Phenanthrene	98	of	588	0.000216	0.0059	0.0020
Phenol	6	of	588	0.0013	0.0435	0.0092
Pyrene	4	of	588	0.000106	0.002	0.0008
Inorganics						
Aluminum	61	of	507	0.203	6.59	1.10
Antimony	47	of	507	0.0051	0.0127	0.0076
Arsenic	209	of	939	0.002	1.28	0.04
Barium	238	of	575	0.201	67.4	0.888
Beryllium	1	of	507	0.0116	0.0116	0.0116
Calcium Metal	507	of	508	26.3	565	113
Chromium	7	of	579	0.0104	0.139	0.0335
Copper	8	of	575	0.0119	0.068	0.038
Cyanide	1	of	72	0.15	0.15	0.15
Iron	271	of	577	0.1	55.2	1.5
Lead	56	of	575	0.003	0.198	0.01
Magnesium	507	of	508	6.02	137	18.5
Manganese	269	of	578	0.015	16.1	0.75
Mercury	15	of	575	0.0002	0.0018	0.0006
Nickel	1	of	507	0.012	0.012	0.012
Potassium	21	of	476	5.78	116	16.3
Selenium	8	of	575	0.0052	0.009	0.007
Silver	1	of	575	0.0283	0.0283	0.0283
Sodium	508	of	508	10.6	2410	46.8
Thallium	4	of	507	0.0052	0.0108	0.0078

Vanadium	1	of	507	0.0769	0.0769	0.0769
Zinc	87	of	575	0.0204	0.961	0.114

Notes:
This list is not inclusive; additional COCs may not be included on this list.
Some contaminant concentrations may not have been detected due to high method detection limits.

Table 3A: Summary of Chemicals of Concern and Medium Specific Exposure Point Concentrations for Impoundment Contents

Scenario Timeframe: **Current/Future**
Medium: **Impoundment**
Exposure Medium: **Impoundment**

Exposure Point	Chemical of Concern	Exposure Point Concentration	EPC Units	Statistic
Impoundment 3	Benzene	36000	mg/kg	1
	Naphthalene	24000	mg/kg	1
	Nitrobenzene	530	mg/kg	1
	N-Nitrosodiphenylamine	1800	mg/kg	1
Impoundment 4	Benzene	21000	mg/kg	1
	Naphthalene	41	mg/kg	1
Impoundment 5	Benzene	7200	mg/kg	1
	Xylene	7000	mg/kg	1
	1,2-Dichlorobenzene	30000	mg/kg	1
	2-Methylnaphthalene	12000	mg/kg	1
	Naphthalene	240000	mg/kg	1
	Nitrobenzene	75000	mg/kg	1
	N-Nitrosodiphenylamine	30000	mg/kg	1
Impoundment 13	Benzene	10.2	mg/kg	1
	Naphthalene	9300	mg/kg	1
	Nitrobenzene	588	mg/kg	1
	N-Nitrosodiphenylamine	610	mg/kg	1
Impoundment 17	Naphthalene	300	mg/kg	1
Impoundment 24	Benzene	89.5	mg/kg	1
	1,2-Dichlorobenzene	13000	mg/kg	1
	Napthalene	8800	mg/kg	1
	N-Nitrosodiphenylamine	1200	mg/kg	1

Footnote: (1) Maximum Detected Concentration was used to estimate risk

Table 3B: Summary of Chemicals of Concern and Medium Specific Exposure Point Concentrations for North Area Soils

Scenario Timeframe: Current/Future
Medium: Soil
Exposure Medium: Surface Soil

Exposure Point	Chemical of Concern	Exposure Point Concentration	EPC Units	Statistic
Surficial Soils in the North Area	Ethylbenzene	1500	mg/kg	1
	Trichloroethylene	80	mg/kg	1
	Xylenes	13000	mg/kg	1
	Benzo(a)anthracene	1300	mg/kg	1
	Benzo(a)pyrene	61	mg/kg	1
	Benzo(b)fluoranthene	48	mg/kg	1
	Benzo(k)fluoranthene	60	mg/kg	1
	Bis(2-ethylhexyl)phthalate	120	mg/kg	1
	Dibenzo(a,h)anthracene	4.2	mg/kg	1
	Hexachlorobenzene	39	mg/kg	1
	Indeno(1,2,3-cd)pyrene	24	mg/kg	1
	Naphthalene	290	mg/kg	1
	Nitrobenzene	600	mg/kg	1
	N-nitrosodiphenylamine	14100	mg/kg	1
	Total PCBs	560	mg/kg	1
	Antimony	25200	mg/kg	1
	Arsenic	382	mg/kg	1
	Cadmium	3960	mg/kg	1
	Chromium Total	214000	mg/kg	1
	Chromium VI	214000	mg/kg	1
	Cobalt	22500	mg/kg	1
	Copper	14600	mg/kg	1
	Cyanide	89400	mg/kg	1
	Iron	578000	mg/kg	1
	Mercury	1320	mg/kg	1
	Thallium	53.2	mg/kg	1

Footnote: (1) Maximum Detected Concentration was used to estimate risk

Table 3C: Summary of Chemicals of Concern and Medium Specific Exposure Point Concentrations for Overburden and Bedrock Groundwater

Scenario Timeframe: Current/Future
Medium: Groundwater
Exposure Medium: Groundwater

Exposure Point	Chemical of Concern	Exposure Point Concentration	EPC Units	Statistic
Overburden Groundwater	1,2-Dichloroethane	41.6	ug/l	1
	Benzene	1400	ug/l	1
	Chloroform	22.3	ug/l	1
	Ethylbenzene	14.6	ug/l	1
	Methylene chloride	9.5	ug/l	1
	Tetrachloroethylene	3.14	ug/l	1
	1,4-Dichlorobenzene	76.7	ug/l	1
	Benzo(a)anthracene	0.038	ug/l	1
	Bis(2-ethylehexyl)phthalate	9.89	ug/l	1
	Indeno(1,2,3-cd)pyrene	0.32	ug/l	1
	Naphthalene	813	ug/l	1
	Nitrobenzene	5.75	ug/l	1
	n-Nitrosodiphenylamine	100	ug/l	1
	Pentachlorophenol	2.94	ug/l	1
	Arsenic	16.2	ug/l	1
	Iron	48300	ug/l	1
	Manganese	3580	ug/l	1
	Thallium	2.81	ug/l	1
Bedrock Groundwater	Benzene	340	ug/l	1
	Carbon Disulfide	1890	ug/l	1
	Carbon Tetrachloride	2.5	ug/l	1
	Chlorobenzene	292	ug/l	1
	Chloroform	0.78	ug/l	1
	Ethylbenzene	5.24	ug/l	1
	Tetrachloroethylene	7.3	ug/l	1
	Trichloroethylene	2.67	ug/l	1
	Vinyl chloride	0.26	ug/l	1
	4-Chloroaniline	0.61	ug/l	1
	Benzo(a)pyrene	0.1	ug/l	1
	Benzo(b)fluoranthene	0.12	ug/l	1
	1,2,4-Trichlorobenzene	57.2	ug/l	1
	1,4-Dichlorobenzene	13.6	ug/l	1
	Nitrobenzene	5.76	ug/l	1
	Arsenic	1.95	ug/l	1
	Manganese	1610	ug/l	1

Footnote: (1) Maximum Detected Concentration was used to estimate risk

Table 4A: Industrial RSL Summary for Impoundments

Pathway: Impoundments
Receptor: Industrial Worker

Chemical of Concern	RSL[1] (mg/kg)	Date of RSL[1]
Benzene	5.6	Jan 2010
Toluene	46000	Jan 2010
Xylene	2600	Jan 2010
Naphthalene	20	Jan 2010
Nitrobenzene	280	Jan 2010
N-Nitrosodiphenylamine	350	Jan 2010
2-Methylnaphthalene	4100	Jan 2010
1,2-Dichlorobenzene	10000	Jan 2010

Footnotes:
(1) Regional Screening Level (RSL) obtained in January 2010. The industrial screening criteria were used as a conservative measure to evaluate the industrial/commercial receptor considering the designated use and zoning of the property is industrial/commercial. The screening criteria are identified on the following website: http://www.epa.gov/region9/superfund/prg/

Table 4B: Trespasser RSL Summary for North Area Soils

Pathway: North Area Soils
Receptor: Trespasser

Chemical of Concern	RSL[1] (mg/kg)	Date of RSL[1]
Ethylbenzene	5.4	May 2011
Benzo(a)anthracene	0.15	May 2011
Benzo(a)pyrene	0.015	May 2011
Dibenzo(a,h)anthracene	0.015	May 2011
Indeno(1,2,3-cd)pyrene	0.15	May 2011
N-Nitrosodiphenylamine	99	May 2011
Total PCBs	0.22	May 2011
Antimony	31	May 2011
Arsenic	0.39	May 2011
Chromium Total[2]	0.29	May 2011
Chromium VI	0.29	May 2011
Cobalt	370	May 2011
Copper	3100	May 2011
Cyanide	1600	May 2011
Iron	55000	May 2011
Mercury	7.8	May 2011
Thallium	0.78	May 2011

Footnotes:
(1) Regional Screening Level (RSL) obtained in May 2011. The residential screening criteria were used as a conservative measure to evaluate the trespasser receptor. The screening criteria are identified on the following website: http://www.epa.gov/region9/superfund/prg/
(2) The RSL table does not have screening criteria for Total Chromium. The screening criteria used for Total Chromium was obtained by using the screening criteria for Chromium VI.

Table 4C: Industrial RSL Summary for North Area Soils

Pathway: North Area Soils Receptor: Industrial Worker		
Chemical of Concern	**RSL[1] (mg/kg)**	**Date of RSL[1]**
Ethylbenzene	29	Jan 2010
Trichloroethylene	14	Jan 2010
Xylenes	2600	Jan 2010
Benzo(a)anthracene	2.1	Jan 2010
Benzo(a)pyrene	0.21	Jan 2010
Benzo(b)fluoranthene	2.1	Jan 2010
Benzo(k)fluoroanthene	21	Jan 2010
Bis(2-ethylhexyl)phthalate	120	Jan 2010
Dibenzo(a,h)anthracene	0.21	Jan 2010
Hexachlorobenzene	1.1	Jan 2010
Indeno(1,2,3-cd)pyrene	2.1	Jan 2010
Naphthalene	20	Jan 2010
Nitrobenzene	280	Jan 2010
N-Nitrosodiphenylamine	350	Jan 2010
Total PCBs	0.74	Jan 2010
Antimony	410	Jan 2010
Arsenic	1.6	Jan 2010
Cadmium	810	Jan 2010
Chromium Total[2]	1400	Jan 2010
Chromium VI	200	Jan 2010
Cobalt	300	Jan 2010
Cyanide	20000	Jan 2010
Mercury	100	Jan 2010

Footnotes:
(1): Regional Screening Level (RSL) obtained in January 2010. The industrial screening criteria were used as a conservative measure to evaluate the industrial/commercial receptor considering the designated use and zoning of the property is industrial/commercial. The screening criteria are identified on the following website: http://www.epa.gov/region9/superfund/prg/
(2): The RSL table does not have screening criteria for Total Chromium. The screening criteria used for Total Chromium was obtained by using the screening criteria for Chromium VI.

Table 4D: Residential RSL Summary for Groundwater

Pathway: Groundwater
Receptor: Residential

Chemical of Concern	RSL[1] (mg/kg)	Date of RSL[1]
1,2-Dichloroethane	0.15	Jan 2010
Benzene	0.41	Jan 2010
Chloroform	0.19	Jan 2010
Ethylbenzene	1.5	Jan 2010
Methylene chloride	4.8	Jan 2010
Tetrachloroethylene	0.11	Jan 2010
1,4-Dichlorobenzene	0.43	Jan 2010
Benzo(a)anthracene	0.029	Jan 2010
Bis(2-ethylhexyl)phthalate	4.8	Jan 2010
Indeno (1,2,3-cd)pyrene	0.29	Jan 2010
Naphthalene	0.14	Jan 2010
Nitrobenzene	0.12	Jan 2010
n-Nitrosodiphenylamine	14	Jan 2010
Pentachlorophenol	0.56	Jan 2010
Benzo(a)pyrene	0.0029	Jan 2010
4-Chloroaniline	0.34	Jan 2010
Benzo(b)fluoranthene	0.029	Jan 2010
Carbon Disulfide	1000	Jan 2010
1,2,4-Trichlorobenzene	8.2	Jan 2010
Carbon Tetrachloride	0.2	Jan 2010
Chlorobenzene	91	Jan 2010
Trichloroethylene	1.7	Jan 2010
Vinyl chloride	0.016	Jan 2010
Arsenic	0.045	Jan 2010
Iron	26000	Jan 2010
Manganese	880	Jan 2010
Thallium	2.4	Jan 2010

Footnotes:
(1): Regional Screening Level (RSL) obtained in January 2010. The industrial screening criteria were used as a conservative measure to evaluate the residential receptor considering groundwater aquifer is designated as a potable water supply. The screening criteria are identified on the following website: http://www.epa.gov/region9/superfund/prg/

Table 5A: Non-Carcinogenic Risk Characterization Summary Table for Impoundment Media

Scenario Timeframe: Current/Future
Receptor Population: Industrial/Commercial Worker
Receptor Age: Adult

Exposure Point	Chemical of Concern	Non-Carcinogenic Risk Exposure Route Total*
Impoundment 3	Nitrobenzene	1.9
	Hazard Index Total*:	**1.9**
Impoundment 5	Xylene	2.7
	1,2-Dichlorobenzene	3.0
	2-Methylnaphthalene	2.9
	Nitrobenzene	270
	Hazard Index Total*:	**280**
Impoundment 13	Nitrobenzene	2.1
	Hazard Index Total*:	**2.1**
Impoundment 24	1,2-Dichlorobenzene	1.3
	Hazard Index Total*:	**1.3**

Footnote:
(*) The Exposure Route Total was based upon the health endpoint that is driving the risk. Hazard Indices were reported to two significant figures; therefore, the non-carcinogenic risk exposure route totals for individual COCs may not add up to the Total Non-Cancer Hazard Index. The Total Non-Cancer Hazard Index will be underestimated since other chemicals for which the risk is driven by the cancer health endpoint, but also have a non-cancer health endpoint, are not identified on this table.

Table 5B: Non-Carcinogenic Risk Characterization Summary Table for North Area Soils

Scenario Timeframe: Current/Future
Receptor Population: Industrial/Commercial
Receptor Age: Adult

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Non-Carcinogenic Risk Exposure Route Total*
Soil	Surface Soil	North Area	Xylene	5.0
			Nitrobenzene	2.1
			Antimony	61
			Cadmium	4.9
			Cobalt	75
			Cyanide	4.5
			Mercury	13
			Hazard Index Total*:	**170**

Scenario Timeframe: Current/Future
Receptor Population: Trespasser
Receptor Age: Adolescent

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Non-Carcinogenic Risk Exposure Route Total*
Soil	Surface Soil	North Area	Antimony	290
			Cadmium	2.4
			Chromium VI	330
			Cobalt	350
			Copper	1.7
			Cyanide	21
			Iron	3.8
			Mercury	44
			Thallium	3.8
			Hazard Index Total*:	**1000**

Footnote:
(*) - The Exposure Route Total was based upon the health endpoint that is driving the risk. Hazard Indices were reported to two significant figures; therefore, the non-carcinogenic risk exposure route totals for individual COCs may not add up to the Total Non-Cancer Hazard Index. The Total Non-Cancer Hazard Index will be underestimated since other chemicals for which the risk is driven by the cancer health endpoint, but also have a non-cancer health endpoint, are not identified on this table.

Table 5C: Non-Carcinogenic Risk Characterization Summary Table for Groundwater

Scenario Timeframe: **Future**
Receptor Population: **Resident**

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Non-Carcinogenic Risk Exposure Route Total*
Groundwater	Groundwater	Overburden	Chlorobenzene	5.7
			1,2-Dichlorobenzene	1.6
			Aniline	150
			Iron	1.9
			Manganese	4.1
			Thallium	1.2
			Groundwater Hazard Index Total*:	**160**
Groundwater	Groundwater	Bedrock	Carbon Disulfide	1.9
			Chlorobenzene	3.2
			1,2,4-Trichlorobenzene	7.0
			Manganese	1.8
			Groundwater Hazard Index Total*:	**14**

Footnote:
(*) - The Exposure Route Total was based upon the health endpoint that is driving the risk. Hazard Indices were reported to two significant figures; therefore, the non-carcinogenic risk exposure route totals for individual COCs may not add up to the Total Non-Cancer Hazard Index. The Total Non-Cancer Hazard Index will be underestimated since other chemicals for which the risk is driven by the cancer health endpoint, but also have a non-cancer health endpoint, are not identified on this table.

Table 6A: Carcinogenic Risk Characterization Summary Table for Impoundment Media

Scenario Timeframe: Current/Future
Receptor Population: Industrial/Commercial Worker
Receptor Age: Adult

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Carcinogenic Risk Exposure Route Total*
Impoundment	Impoundment	Impoundment 3	Benzene	6.4E-03
			Naphthalene	1.2E-03
			n-Nitrosodiphenylamine	5.1E-06
			Cancer Risk Total *:	**7.6E-03**
Impoundment	Impoundment	Impoundment 4	Benzene	3.8E-03
			Naphthalene	2.1E-06
			Cancer Risk Total *:	**3.8E-03**
Impoundment	Impoundment	Impoundment 5	Benzene	1.3E-03
			Naphthalene	1.2E-02
			n-Nitrosodiphenylamine	8.6E-05
			Cancer Risk Total *:	**1.3E-02**
Impoundment	Impoundment	Impoundment 13	Benzene	1.8E-06
			Naphthalene	4.7E-04
			n-Nitrosodiphenylamine	1.7E-06
			Cancer Risk Total *:	**4.7E-04**
Impoundment	Impoundment	Impoundment 17	Naphthalene	1.5E-05
			Cancer Risk Total *:	**1.5E-05**
Impoundment	Impoundment	Impoundment 24	Benzene	1.6E-05
			Naphthalene	4.4E-04
			n-Nitrosodiphenylamine	3.4E-06
			Cancer Risk Total *:	**4.6E-04**

Footnote:
(*) The Exposure Route Total was based upon the health endpoint that is driving the risk. The carcinogenic risks were reported to two significant figures; therefore, the carcinogenic risk exposure route totals for individual COCs may not add up to the Cancer Risk Totals. The Total Non-Cancer Hazard Index will be underestimated since other chemicals for which the risk is driven by the cancer health endpoint, but also have a non-cancer health endpoint, are not identified on this table.

Table 6B: Carcinogenic Risk Characterization Summary Table for North Area Soils

Scenario Timeframe: Current/Future
Receptor Population: Industrial/Commercial
Receptor Age: Adult

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Carcinogenic Risk Exposure Route Total*
Soil	Surface Soil	North Area	Ethylbenzene	5.2E-05
			Trichloroethylene	5.7E-06
			Benzo(a)anthracene	6.2E-04
			Benzo(a)pyrene	2.9E-04
			Benzo(b)fluoranthene	2.3E-05
			Benzo(k)fluoranthene	2.9E-06
			Bis(2-ethylhexyl)phthalate	1.0E-06
			Dibenzo(a,h)anthracene	2.0E-05
			Hexachlorobenzene	3.6E-05
			Indeno(1,2,3-cd)pyrene	1.1E-05
			Naphthalene	1.5E-05
			n-Nitrosodiphenylamine	4.0E-05
			Total PCBs	7.6E-04
			Arsenic	2.4E-04
			Chromium Total	1.5E-04
			Chromium VI	1.1E-03
			Total Cancer Risk (Chromium Total)[1]:	**2.3E-03**
			Total Cancer Risk (Chromium VI)[1]:	**3.2E-03**

Scenario Timeframe: Current/Future
Receptor Population: Trespasser
Receptor Age: Adolescent

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Carcinogenic Risk Exposure Route Total*
Soil	Surface Soil	North Area	Ethylbenzene	7.6E-06
			Benzo(a)anthracene	1.1E-04
			Benzo(a)pyrene	5.1E-05
			Dibenzo(a,h)anthracene	3.5E-06
			Indeno(1,2,3-cd)pyrene	2.0E-06
			N-Nitrosodiphenylamine	7.0E-06
			Total PCBs	1.3E-04
			Arsenic	4.2E-05
			Chromium Total	2.5E-06
			Chromium VI	1.7E-05
			Total Cancer Risk (Chromium Total)[1]:	**3.6E-04**
			Total Cancer Risk (Chromium VI)[1]:	**3.7E-04**

Footnotes:
(1) Due to the differing toxicity criteria used to calculate the RSL for Chromium VI and Total Chromium, the Total Cancer Risk was calculated separately.
(*) The Exposure Route Total was based upon the health endpoint that is driving the risk. The carcinogenic risks were reported to two significant figures; therefore, the carcinogenic risk exposure route totals for individual COCs may not add up to the Cancer Risk Totals. The Total Cancer Risk will be underestimated since other chemicals for which the risk is driven by the non-cancer health endpoint, but also have a cancer health endpoint, are not identified on this table.

Table 6C: Carcinogenic Risk Characterization Summary Table for Groundwater

Scenario Timeframe: **Future**
Receptor Population: **Resident**

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Carcinogenic Risk Exposure Route Total*
Groundwater	Groundwater	Overburden	1,2-Dichloroethene	2.8E-04
			Benzene	3.4E-03
			Chloroform	1.2E-04
			Ethylbenzene	9.7E-06
			Methylene chloride	2.0E-06
			Tetrachloroethylene	2.9E-05
			1,4-Dichlorobenzene	1.8E-04
			Benzo(a)anthracene	1.3E-06
			Bis(2-ethylhexyl)phthalate	2.1E-06
			Indeno(1,2,3-cd)pyrene	1.1E-06
			Naphthalene	5.8E-03
			Nitrobenzene	4.8E-05
			n-Nitrosodiphenylamine	7.1E-06
			Pentachlorophenol	5.3E-06
			Arsenic	3.6E-04
			Cancer Risk Total *:	**1.0E-02**
Groundwater	Groundwater	Bedrock	Benzene	8.3E-04
			Carbon Tetrachloride	1.3E-05
			Chloroform	4.1E-06
			Ethylbenzene	3.5E-06
			Tetrachloroethylene	6.6E-05
			Trichloroethylene	1.6E-06
			Vinyl chloride	1.6E-05
			4-Chloroaniline	1.8E-06
			Benzo(a)pyrene	3.5E-05
			Benzo(b)fluoranthene	4.0E-06
			1,4-Dichlorobenzene	3.2E-05
			Nitrobenzene	4.8E-05
			Arsenic	4.3E-05
			Cancer Risk Total *:	**1.1E-03**

Footnote:
(*) - The Exposure Route Total was based upon the health endpoint that is driving the risk. The carcinogenic risks were reported to two significant figures; therefore, the carcinogenic risk exposure route totals for individual COCs may not add up to the Cancer Risk Totals. The Total Non-Cancer Hazard Index will be underestimated since other chemicals for which the risk is driven by the cancer health endpoint, but also have a non-cancer health endpoint, are not identified on this table.

Table 7A: Impoundments

Direct Contact Control	
Numerical Values not Applicable	
Vapor Control (mg/kg)[1]	
Benzene	4.23
Toluene	11,110
Xylene	4,470
Chlorobenzene	2,590
Naphthalene	948
Movement Control[2]	
Tarry substances of Impoundments 3, 4, and 5 – Numerical Values not Applicable	

Table 7B: North Area Soils

Direct Contact Control (mg/kg)[3]	
Antimony	410
Arsenic	19
Benzo(a)anthracene	2.1
Benzo(a)pyrene	0.21
Cadmium	800
Chromium (total)	NC[4]
Chromium VI	5.6
Cobalt	300
Cyanide	20,000
Lead	800
Mercury	43
Nitrobenzene	24
Total PCBs	0.74
Xylene (total)	2,700
Vapor Control (mg/kg) [1]	
Benzene	4.23
Toluene	11,110
Xylene	4,470
Chlorobenzene	2,590
Naphthalene	948
Movement Control (mg/kg) [2]	
Benzene	4,460
1,2 Dichlorobenzene	98,400
n-Nitrosodiphenylamine	352,000
Nitrobenzene	12,300
Naphthalene	6,180

Table 7C: South and West Area Soils

Direct Contact Control (mg/kg)[3]	
Chromium VI	5.6
Lead	800
Mercury	43
Vapor Control (mg/kg) [1]	
Benzene	4.23
Toluene	11,110
Xylene	4,470
Chlorobenzene	2,590
Naphthalene	948
Movement Control (mg/kg) [2]	
Benzene	4,460
1,2 Dichlorobenzene	98,400
n-Nitrosodiphenylamine	352,000
Nitrobenzene	12,300
Naphthalene	6,180

Table 7D: Groundwater

	NJ GWQS (μg/l)[5]	NJ MCL (μg/l)[5]	EPA MCL (μg/l)[5]
Benzene	1	1	5
1,2-Dichlorobenzene	600	NC	600
2-Methylnapthalene	30	NC	150
Naphthalene	300	300	0.14
Nitrobenzene	6	NC	0.12
n-Nitrosodiphenylamine	10	NC	NC
Toluene	600	1000	1000
Xylene	1,000	1,000	10,000

Notes:

(1) These values are preliminary and a more refined assessment method will be developed and implemented during the Remedial Design phase to appropriately delineate areas requiring vapor control.

(2) While numerical criteria were developed to aid in defining the extent of contaminated media requiring movement control, visual observation of tarry substances will also be utilized to identify these areas, regardless of whether the tarry substances exceed the numerical criteria.

(3) Soil remediation goals were selected based upon consideration of both risk-based concentrations and promulgated NJDEP Non-Residential Direct Contact Soil Remediation Standards. NJDEP Impact-to-Groundwater Soil Screening Criteria were also evaluated as “To-Be-Considered” criteria.

(4) NC denotes no criteria available.

(5) The more stringent of the EPA federal MCLs, NJDEP groundwater quality criteria, NJDEP MCLs, and site-specific, risk-based concentrations will be utilized as the remediation goal for groundwater.

Table 8: ARARs, Criteria, and Guidance				
STANDARD, REQUIREMENT OR LIMITATION	**CITATION**	**MEDIUM**	**REQUIREMENTS**	**COMMENTS**
CHEMICAL-SPECIFIC				
FEDERAL				
Clean Air Act	42 USC 7401 et. seq. as amended	Air	Provides provisions for air pollution prevention and control utilizing air quality criteria and emission limitations.	
Federal Water Pollution Control Act	33 USC 1251 et seq. as amended by the Clean Water Act of 1977 (40 CFR Part 131)	Surface water Ground water	Provides guidance for both the elimination of toxic discharge in toxic amounts and for waste treatment management planning processes.	
National Primary Drinking Water Standards	40 CFR Part 141	Ground Water and Surface Water	Establishes maximum contaminant levels (MCLs) applicable to water used in public water systems.	
Identification And Listing Of Hazardous Waste, 40 CFR Part 261	40 CFR Part 261	Soil and Sediment	Identifies those solid wastes which are subject to regulation as hazardous wastes and sets forth the criteria used to identify characteristics of hazardous waste and to list particular hazardous wastes	
RCRA MCL for Ground Water	40 CFR 264.94	Ground water	Provides maximum concentration of constituents for ground water protection.	RCRA MCLs for barium, chromium, selenium, and silver are more stringent than New Jersey Ground Water Quality Standards, NJAC 7:9-6.
Ecological-based surface water screening criteria	Ecological Screening Values for Surface Water and Sediment (February 1998)	Surface water and Sediment	Provide surface water and sediment screening criteria	Currently incorporated into the BERA for the Floodplain portion of the site.
1998 Guidance for Sediment Quality Criteria		Sediment	Provides sediment screening criteria	Currently incorporated into the BERA for the Floodplain portion of the site.

Ecological-based soil screening criteria (Ecological Soil Screening Level Guidance (USEPA 2000); Toxicological Benchmarks for Contaminants of Potential Concern for Effects on Terrestrial Plants: 1997 Revision. (Efroymson et al. 1997); Toxicological benchmarks for Contaminants of Potential Concern for Effects on Soil and Litter Invertebrates and Heterotrophic Process: 1997 Revision. (Efroymson et al. 1997a))		Soil	Collectively provide soil screening criteria relative to ecological risk	Currently incorporated into the BERA for the Floodplain portion of the site.
Corrective Action Management Unit (CAMU) Requirements under the Group III ROD	Group III ROD	Soil	Bioremediation Treatment Objectives (Material Category B) and Low Temperature Treatment Objectives (Material Category A)	
New CAMU Requirements		Soil	Material and Technology-specific Treatment Objectives	Would require bench- and pilot-testing to establish.
STATE				
New Jersey Air Pollution Control Regulations	NJAC 7:27	Air	Provides regulations that govern the emitting of and such activities as result in the introducing of contaminants into the ambient atmosphere.	
New Jersey Surface Water Quality Standards	NJAC 7.9B	Surface water	Provides surface water quality standards	The Raritan River and Cuckolds Brook are classified as a FW2-NT (non-trout associated waterway).
New Jersey Ground Water Quality Standards	NJAC 7:9C	Ground water	Provides ground water quality criteria and constituent standards.	Site bedrock ground water is classified as Class II, therefore, the Class II criteria and standards apply. Requires ground water discharging to surface water to achieve the surface water quality standards.
New Jersey Safe Drinking Water Act	NJAC 7:10	Ground water	Provides drinking water quality criteria and constituent standards.	
New Jersey Remediation Standards	NJAC 7:26D	Soil Ground water Surface water	Establishes minimum standards for remediation of contaminated ground water and surface water, and establishes minimum residential direct contact and non-residential direct contact soil remediation standards.	Direct-contact residual risks would be eliminated by excavation and/or capping. Groundwater residual risks would be controlled by collection/treatment system.
New Jersey Location Standards for New Hazardous Waste Facilities	NJAC 7:26-10.3	Soil Ground water Surface water Sediment	Provides guidance for locating new hazardous waste facilities in relation to potential impacts to adjacent media.	This ARAR would be met by specifying the substantive requirements in the remedial action contract and by maintaining compliance with the requirements through remedial action monitoring.

LOCATION-SPECIFIC				
FEDERAL				
Location Standards (Floodplains)	40 CFR 264.18(b)	100-year floodplains	Requires design, construction, operation, and maintenance to avoid washout of RCRA hazardous waste	
Floodplain Management	Executive Order 11988	Floodplains	Requires evaluation of alternatives that impact floodplains, and a floodplain value assessment	
Protection of Floodplains	40 CFR 6 Appendix A	Floodplains	Actions to avoid adverse effects, minimize potential harm, restore and preserve natural and beneficial values of lowlands and flood prone areas.	
Wild and Scenic Rivers Act	36 CFR Section 297.4Bridgewater	Wild and Scenic rivers	Requires determination of affects of project on free-flowing characteristics, scenic, or natural values of a designated river.	The Raritan is not a Wild and Scenic River based on the National Wild and Scenic Rivers System web page located at http://www.nps.gov/rivers/.
Cultural Resource/Archaeological Resource Protection Requirements		Historic area	Action to preserve historic properties; planning of action to minimize harm to National Historic Landmarks. Avoid impacts on cultural resources. Where impacts are unavoidable, mitigate through design and data recovery.	The ERA concluded no cultural resources existed on the property.
Endangered Species Act	16 USC Sec. 1531	Critical habitat	Action to preserve endangered species or threatened species, including consultation with the Department of Interior. Identify activities that may affect listed species. Actions must not threaten the continued existence of a listed species. Actions must not destroy critical habitat.	The ERA concluded that there are no endangered species on the site. Incorporated in the BERA.
Protection of Wetlands	Executive Order 11990	Wetlands	Requires consideration of factors relevant to project's effects on survival and quality of wetlands.	Enhancement of existing, unimpacted wetlands and habitats and/or creation of new wetlands/habits would be employed to mitigate impacts.
Wetlands and Floodplains Assessment of CERCLA sites.	EPA Statement of Policy	Wetlands	Requires consideration of factors relevant to project's effects on survival and quality of wetlands.	Enhancement of existing, unimpacted wetlands and habitats and/or creation of new wetlands/habits would be employed to mitigate impacts.
401 Water Quality Certification	33 U.S.C. 1314	Wetlands	Requires, as a condition of federal permit approvals, state certification that the federal permit issued under Section 404 meets state water quality standards. Includes all wetlands that may be affected by a federally permitted activity.	
STATE				

New Jersey Location Standards for New Hazardous Waste Facilities	NJAC 7:26-10.3	Soil Ground water Surface water Sediment	Provides guidance for locating new hazardous waste facilities in relation to potential impacts to adjacent media.	This ARAR would be met by specifying the substantive requirements in the remedial action contract and by maintaining compliance with the requirements through remedial action monitoring.
New Jersey Flood Area Hazard Control Act Regulations	NJAC 7:13	Floodplains	Requires a permit for all development within a flood hazard area. Flood hazard area means land, and the space above that land, which lies below the flood hazard area design flood elevation. The flood hazard design flood is a flood equal to the 100-year flood plus an additional amount of water in fluvial areas.	Both the area between the flood control dike and river and the area within the flood control dike are within the flood hazard area, one being a floodway and one a flood fringe, respectively.
New Jersey Freshwater Wetlands Protection Act Rules	NJAC 7:7A	Wetlands	A person proposing to engage in a regulated activity, as described at N.J.A.C. 7:7A-2.2, shall first obtain a general permit authorization or an Individual freshwater wetlands or open water fill permit. A person proposing to engage in a prohibited activity, as described at N.J.A.C. 7:7A-2.6, in a transition area shall first obtain approval from the Department through a transition area waiver or general permit authorization.	Regulated activities generally refer to such activities as removal/disturbance of sediments, drainage of water, disturbance of water levels, filling, driving of piling, placement of obstructions. Activities such as placing pilings for bridges, elevated walkways are not regulated (see NJAC 7.7A-2.2 (c) 5 I (1)). Remedial actions at the site have generally required a transition area waiver or general permit. For wetlands, if any, within the Main Plant Area, general permit #27 – Redevelopment of Previously Disturbed Areas may be appropriate to use.
LOCAL				
Bridgewater Township Land Use	Ordinance Article XXXIX, Sections 126-289	Floodplains	Specifies requirements for development in a floodplain. Provides performance standards for evaluation of land use. Requires flood-proofing requirements for structures constructed in the flood fringe.	

ACTION-SPECIFIC				
FEDERAL				
RCRA Hazardous Waste Facility Requirements	40 CFR Parts 264/265, Subparts A-E	General	Provides requirements for capping wastes in place, closure of wastes in place, container storage, construction of new landfills, land treatment, excavation, and incineration.	
Land Disposal Restrictions (LDRs)	40 CFR 268	General	Provides restrictions to any land disposal activities by establishing treatment standards for hazardous wastes that must be achieved prior to disposal.	Granting a CAMU and developing alternative treatment standards to comply with these regulations.
Nationwide Permit Program	Clean Water Act Section 404 and 33 CFR Part 330	Wetlands	Permit required for discharge of fill material in wetland. Nationwide permit exists for hazardous and toxic waste cleanup.	Conditions related to permits must be met.
Clean Water Act	40 CFR Part 131	Surface water Ground water	Provides regulations for discharges of pollutants to Waters of the U.S. and water quality standards for all contaminants in surface waters.	
Fish and Wildlife Coordination Act	16 USC 661, 40 CFR 6.302(e)	Stream or River	Action to protect fish or wildlife during diversion, channeling or other activity that modifies a stream or river.	No stream/brook modifications are envisioned.
Capping (RCRA Subtitle C)	40 CFR Part 264.310	Cover	Placement of a cap over waste requires a cover designed to : • provide long-term minimization of migration of liquids through the capped area, • function with minimum maintenance, • promote drainage and minimize erosion or abrasion of the cover, • accommodate settling and subsidence so that the cover's integrity is maintained, and have a permeability less than or equal to the permeability of any bottom liner system or natural sub-soils present.	TSCA requirements not applicable when sources of PCBs had concentrations of less than 50 ppm. Outlines action levels above which action (i.e., treatment or containment) should be considered.
Ground Water Protection (RCRA Subtitle C)	40 CFR Part 264 Subpart F	Cover	Ground water protection requirements include: • establishment of a detection monitoring program (264.98) • establishment of a compliance monitoring program (264.99), and • a corrective action monitoring program (264.100) when required by 40 CFR 264.91. All monitoring programs must meet RCRA general ground water monitoring requirements (264.97).	

Corrective Action Management Unit Regulations	40 CFR 264.552	Cover/ Excavation	Provides regulations related to placement of a cap over a corrective action management unit (CAMU). A CAMU is defined as an area within a facility that is used only for managing CAMU-eligible wastes for implementing corrective action or cleanup at the facility. A CAMU must be located within the contiguous property under the control of the owner or operator where the wastes to be managed in the CAMU originated. One or more CAMUs may be designated at a facility.	
Design Criteria	40 CFR 258.40	Cover	Requires that the final cover system be designed to minimize infiltration and erosion. The cover system must be designed and constructed to: ▪ Have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than 1 x 10-5 cm/sec, whichever is less, and ▪ Minimize infiltration through the closed MSWLF by the use of an infiltration layer that contains a minimum 18-inches of earthen material, and ▪ Minimize erosion of the final cover by the use of an erosion layer that contains a minimum of 6-inches of earthen material that is capable of sustaining native plant growth.	
Closure Criteria	40 CFR 258.60	Cover		
Post-Closure Care	40 CFR 258.61		Post-closure care must be conducted for 30-years unless demonstrated otherwise by the owner. Post-closure care must include maintenance of cover integrity and effectiveness and monitoring of ground water.	
National Air Quality Standards	40 CFR Part 50	Excavation, grading, soil cover	Provides national primary and secondary ambient air quality standards.	
Department of Transportation Regulations	49 CFR 172 – 174 and 177 – 179	Transportation	Hazardous waste transport to off-site disposal facilities must be conducted in accordance with applicable DOT requirements.	
Standards Applicable to Generators of Hazardous Waste	40 CFR Part 262	Transportation of hazardous waste	If a hazardous waste is transported for off-site treatment, storage, or disposal, a manifest shall be prepared and distributed in accordance with 40 CFR 262.20 through 262.23.	
Occupational Safety and Health Standards and 29 CFR Part 1926 – Safety and Health Regulations for Construction	29 CFR Part 1910	Construction	Remedial construction activities must be conducted in accordance with applicable OSHA requirements.	

STATE				
New Jersey Spill Compensation and Control Act	NJSA 58:10-23.11	Cover	Requires former industrial sites that remain vacant or underutilized in part because they have been contaminated by a discharge of a hazardous substance be cleaned up sufficiently so that they can be safely returned to productive use.	Applicable; Consent Order requires remediation in accordance with this Act.
New Jersey Solid and Hazardous Waste Regulations	NJAC 7:26 – 1-8	General	Regulations that govern the registration, operation, and maintenance of solid waste transporting operations and facilities.	
NJDEP Regulations (Division of Waste Management)	Title 7 in Chap. 26 of the NJAC	General	Provides standards for owners and operators of solid waste and hazardous waste treatment, storage and disposal facilities.	
New Jersey Flood Area Hazard Control Act Regulations	NJAC 7:13	Floodplains	Requires a permit for all development within a flood hazard area. Flood hazard area means land, and the space above that land, which lies below the flood hazard area design flood elevation. The flood hazard design flood is a flood equal to the 100-year flood plus an additional amount of water in fluvial areas.	Both the area between the flood control dike and river and the area within the flood control dike are within the flood hazard area, one being a floodway and one a flood fringe, respectively.
Water Quality Permits Requirements	NJAC 7:14 et. seq.	General	Sets forth rules concerning implement and operation of NJ Permit Discharge Elimination Systems. Discharge to water permits are administered in accordance with approved industrial pretreatment programs and requirements of NJAC 7:14A.	
NJDEP Hazardous Waste Regulations (e.g. New Jersey Closure and post closure care of sanitary landfills)	NJAC 7:26 (NJAC 7:26 – 2A.9)	Cover	Requires preparation of a Closure and Post-Closure Plan that includes a soil erosion and sediment control plan, a final cover design, final cover vegetation, maintenance plan, ground water monitoring, and facility access control.	
Brownfield and Contaminated Site Remediation Act	NJSA 58:10B	Excavation	Requires remediation of Brownfields.	Technical requirements are provided under NJAC 7:26E
New Jersey Technical Requirements for Site Remediation	NJAC 7:26E	Site Investigation/ Remediation	Provides minimum technical requirements to investigate and remediate contamination at any site.	Requires Department oversight, RI if unrestricted use remediation standards are exceeded, remedial action selection report or FS/CMS, remedial action work plan. Also provides remediation requirements for post-excavation sampling, backfilling, and deed restrictions.

New Jersey Air Pollution Control Regulations	NJAC 7:27-13.3	Excavation, grading, soil cover	Provides ambient air quality standards for suspended particulate matter. Primary air quality standards state that, during any 12-consecutive months, the geometric mean value of all 24-hour averages of suspended particulate matter concentrations in ambient air shall not exceed 75 micrograms per cubic meter. And, during any 12-consecutive months, 24-hour average concentrations may exceed 260 micrograms per cubic meter no more than once.	Primary air quality standards means an ambient air quality standard intended to protect the public health.
New Jersey Soil Erosion and Sediment Control Action Requirements	NJAC 2:90, et-seq, and 4:24 management	Excavation, Construction, Storm water	Provides vegetative, engineering, and runoff treatment standards to prevent or limit soil erosion and promote sediment control on and off-site.	
New Jersey Solid and Hazardous Waste Regulations	NJAC 7:26, 7:26G	Excavation /Cover	NJAC 7:26 provides regulations for registration, operation, maintenance, and closure of solid waste facilities. Regulations applicable to generators of hazardous waste are provided in NJAC 7:26G-8. These regulations reference 40 CFR Part 264.	Solid waste is defined in NJAC 7:26-1.6. Hazardous waste. Federal regulations 40 CFR 124, 260 – 266, 268, and 270 are incorporated into NJAC 7:26G by reference. Hazardous waste is defined in 40 CFR 261.3. New Jersey incorporates 40 CFR Part 264 by reference into NJAC 7:26G-8. Therefore, New Jersey cover requirements are the same as the Federal cover requirements.
New Jersey 1998 Revised Guidance Document for the Remediation of Contaminated Soils		Cover and Remediation of soils	Pursuant to the provisions of the N.J.A.C. 7:26E-5.1(d)3, the use of engineering and/or institutional controls must be commensurate with the degree of risk associated with the contaminants left on-site and must be reviewed and approved by the Department.	Under Chapter VIII – Remedial Action 4 – Containment and Exposure Controls, D – Containment System Design Construction, 1 – Native Soil Covers states that “the use of native soil as a cover for containment of hazardous materials may be appropriate where surface water infiltration and subsequent leachate generation are not controlling factors.” It also states that “a typical soil cover…is 18 to 24 in thick with 6 in of topsoil for vegetation purposes.”
New Jersey 2007 Guidance for Beneficial Use of Soil and Non-Soil Material in the Remediation of Contaminated Sites and Closure of Solid Waste Landfills		Placement of fill	Provides guidance on the use of alternative fill material at remediation and landfill sites in a way that is protective of human health and the environment.	Allows for use or reuse of a contaminated soil or non-soil material, exhibiting contaminant concentrations above the most restrictive soil standard or guidance value, for fill and/or capping material, as an effective alternative for a commercial product. Beneficial use material may be used at a contaminated site or a landfill as a constructive part of a remedial action or closure with written approval of the NJDEP pursuant to Solid Waste Regulations at N.J.A.C. 7:26-1.7(g).

Table 9: Summary of the Cost Estimates for the Selected Remedy	
Direct Capital Costs	
Deed Restrictions	$100,000
Mobilization/Demobilization	$250,000
Soil Cover System for Direct Contact Control (113 acres)	$16,927,220
Excavation and Relocation of Site-wide Soils to Impoundments 3, 4, & 5 (1 acre)	$1,937,210
Impermeable Cap for Vapor and Movement Control (66 acres)	$14,226,480
In-situ S/S for Impoundments 3, 4, 5 and other Movement Control Materials (36 acres)	$40,077,960
Excavation and Relocation of Impoundments 13, 17, & 24 to the North Area (if necessary)	$20,809,272
Excavation and Relocation of Drying Bed Hot Spot Area (1,000 CY)	$67,000
Site Restoration for North Area	$300,000
Overburden Groundwater Control System: Impoundments 3, 4, & 5 Area	$5,848,167
Overburden Groundwater Control System: North Area	$2,298,983
Overburden Groundwater Control System: South & West Areas	$2,066,200
Improvements to Existing Bedrock Groundwater Collection System	$53,000
Wetlands Mitigation (8.4 acres)	$672,000
Indirect Capital Costs	
Contingency (25% Direct Capital Cost)	$26,408,373
Project Management (5% Direct Capital Cost)	$5,281,675
Remedial Design (10% Direct Capital Cost)	$10,563,349
Construction Management (6% Direct Capital Cost)	$6,338,010
Operation & Maintenance Costs	
Operation & Maintenance (Annual O&M of $1,665,779 for 30 Years)	$49,973,383
Total Present Worth (Rounded):	**$205,000,000**

APPENDIX III: ADMINISTRATIVE RECORD INDEX

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

114060

Region ID: 02
Doc ID: 114060
Bates: **To:**
Date: 09/19/2012
Pages: 16
Title: ADMINISTRATIVE RECORD INDEX FOR OU4 FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: INDEX

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

Name	Organization

Region ID: 02
Doc ID: 114061
Bates: R2-0000001 **To:** R2-0000001
Date: 09/08/1983
Pages: 1
Title: NPL SITE NARRATIVE FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: WEB PAGE

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

Name	Organization

Region ID: 02
Doc ID: 114062
Bates: R2-0000002 **To:** R2-0000164
Date: 05/25/1988
Pages: 163
Title: ADMINISTRATIVE CONSENT ORDER FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: ADMIN. ORDER
CHART / TABLE
FORM
LEGAL DOCUMENT

	Name	Organization
Author:	,	STATE OF NEW JERSEY, DEPARTMENT OF ENVIRONMENTAL PROTECTION

Name	Organization

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 114064
Bates: R2-0000172 **To:** R2-0000695
Date: 03/01/1992
Pages: 524
Title: BASELINE SITE-WIDE ENDANGERMENT ASSESSMENT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: FIGURE
CHART / TABLE
REPORT

	Name	Organization
Author:	,	BLASLAND, BOUCK & LEE, INC.

	Name	Organization
Addressee:	,	AMERICAN CYANAMID CO.

Region ID: 02
Doc ID: 114065
Bates: R2-0000696 **To:** R2-0001493
Date: 05/01/1992
Pages: 798
Title: SOILS REMEDIAL INVESTIGATION REPORT/FEASIBILITY STUDY WORK PLAN FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: MAP
FIGURE
PLAN
LETTER
CHART / TABLE

	Name	Organization
Author:	,	BLASLAND, BOUCK & LEE, INC.

	Name	Organization
Addressee:	,	AMERICAN CYANAMID CO.

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 114066
Bates: R2-0001494 **To:** R2-0001555
Date: 09/28/1993
Pages: 62
Title: RECORD OF DECISION FOR OU1, GROUP I IMPOUNDMENTS (11, 13, 19 AND 24) FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT
INDEX
MAP
DECISION DOCUMENT
LETTER
CHART / TABLE

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

Name	Organization

Region ID: 02
Doc ID: 114067
Bates: R2-0001556 **To:** R2-0001893
Date: 04/01/1994
Pages: 338
Title: NATURAL RESOURCE ASSESSMENT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT
CHART / TABLE
FIGURE
MAP

	Name	Organization
Author:	,	BLASLAND, BOUCK & LEE, INC.

	Name	Organization
Addressee:	,	AMERICAN CYANAMID CO.

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 114063
Bates: R2-0000165 **To:** R2-0000171
Date: 05/04/1994
Pages: 7
Title: ADMINISTRATIVE CONSENT ORDER AMENDMENT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: ADMIN. ORDER
LEGAL DOCUMENT

	Name	Organization
Author:	,	STATE OF NEW JERSEY, DEPARTMENT OF ENVIRONMENTAL PROTECTION

Name	Organization

Region ID: 02
Doc ID: 106489
Bates: R2-0001894 **To:** R2-0002075
Date: 07/12/1996
Pages: 182
Title: RECORD OF DECISION FOR OU2, GROUP II IMPOUNDMENTS (15, 16, 17 AND 18) FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: MAP
PUBLIC MEETING TRANSCRIPT
LETTER
FORM
REPORT
DECISION DOCUMENT
CHART / TABLE
OTHER

	Name	Organization
Author:	,	STATE OF NEW JERSEY, DEPARTMENT OF ENVIRONMENTAL PROTECTION

Name	Organization

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 99461
Bates: R2-0002076 **To:** R2-0002143
Date: 07/12/1996
Pages: 68
Title: RECORD OF DECISION FOR OU6, HILL PROPERTY SOILS FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: PUBLIC MEETING TRANSCRIPT
DECISION DOCUMENT
REPORT
LETTER
CHART / TABLE
MAP

	Name	Organization
Author:	,	STATE OF NEW JERSEY, DEPARTMENT OF ENVIRONMENTAL PROTECTION

Name	Organization

Region ID: 02
Doc ID: 109482
Bates: R2-0002144 **To:** R2-0002225
Date: 09/28/1998
Pages: 82
Title: RECORD OF DECISION FOR OU3, GROUP III IMPOUNDMENTS (1, 2, 3, 4, 5, 14, 20, & 26) FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: CHART / TABLE
DECISION DOCUMENT
MAP
REPORT

	Name	Organization
Author:	,	STATE OF NEW JERSEY, DEPARTMENT OF ENVIRONMENTAL PROTECTION

Name	Organization

Region ID: 02
Doc ID: 106459
Bates: R2-0002226 **To:** R2-0002242
Date: 11/30/1998
Pages: 17
Title: EXPLANATION OF SIGNIFICANT DIFFERENCE FOR THE RECORD OF DECISION, AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT
MAP
DECISION DOCUMENT
CHART / TABLE
LETTER

	Name	Organization
Author:	,	STATE OF NEW JERSEY, DEPARTMENT OF ENVIRONMENTAL PROTECTION

	Name	Organization

Region ID: 02
Doc ID: 139635
Bates: R2-0002243 **To:** R2-0002258
Date: 09/30/1999
Pages: 16
Title: FIRST FIVE-YEAR REVIEW REPORT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

	Name	Organization

Region ID: 02
Doc ID: 114074
Bates: R2-0002259 **To:** R2-0002281
Date: 05/01/2004
Pages: 23
Title: COMPREHENSIVE SITE-WIDE FEASIBILITY STUDY WORK PLAN FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: CHART / TABLE
REPORT

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

Region ID: 02
Doc ID: 114075
Bates: R2-0002282 **To:** R2-0002297
Date: 09/30/2004
Pages: 16
Title: SECOND FIVE-YEAR REVIEW REPORT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

	Name	Organization

Region ID: 02
Doc ID: 114076
Bates: R2-0002298 **To:** R2-0003004
Date: 01/01/2005
Pages: 707
Title: BASELINE ECOLOGICAL RISK ASSESSMENT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: CHART / TABLE
FIGURE
REPORT

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

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09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 114077
Bates: R2-0003005 **To:** R2-0003180
Date: 02/01/2005
Pages: 176
Title: IMPOUNDMENT REMEDY APPROPRIATENESS EVALUATION FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT
CHART / TABLE
FIGURE
LETTER

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

Region ID: 02
Doc ID: 114078
Bates: R2-0003181 **To:** R2-0003824
Date: 06/01/2005
Pages: 644
Title: DATA ADEQUACY REVIEW FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: FIGURE
LETTER
REPORT
CHART / TABLE

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 114079
Bates: R2-0003825 **To:** R2-0003941
Date: 07/01/2005
Pages: 117
Title: IDENTIFICATION AND SCREENING OF TECHNOLOGIES FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: CHART / TABLE
FIGURE
REPORT

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

Region ID: 02
Doc ID: 114080
Bates: R2-0003942 **To:** R2-0004054
Date: 08/01/2005
Pages: 113
Title: FINAL IMPOUNDMENTS 13, 17, AND 24 AIR EMISSIONS EVALUATION FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: CHART / TABLE
LETTER
FIGURE
REPORT

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 114081
Bates: R2-0004055 **To:** R2-0004772
Date: 02/01/2006
Pages: 718
Title: REMEDIAL INVESTIGATION REPORT FOR GROUNDWATER FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: FIGURE
CHART / TABLE
REPORT

	Name	Organization
Author:	,	WYETH HOLDINGS CORPORATION

	Name	Organization

Region ID: 02
Doc ID: 114082
Bates: R2-0004773 **To:** R2-0004820
Date: 05/01/2006
Pages: 48
Title: DEVELOPMENT AND SCREENING OF SITE-WIDE REMEDIAL ALTERNATIVES FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: CHART / TABLE
REPORT
FIGURE

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 114083
Bates: R2-0004821 **To:** R2-0005251
Date: 12/01/2006
Pages: 431
Title: FINAL HUMAN HEALTH RISK ASSESSMENT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: FIGURE
CHART / TABLE
REPORT
LETTER

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

Region ID: 02
Doc ID: 114084
Bates: R2-0005252 **To:** R2-0005341
Date: 04/03/2007
Pages: 90
Title: SUPPLEMENTAL REMEDIAL INVESTIGATION REPORT FOR GROUNDWATER FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: FIGURE
CHART / TABLE
REPORT

	Name	Organization
Author:	,	WYETH HOLDINGS CORPORATION

	Name	Organization

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 105096
Bates: R2-0005342 **To:** R2-0005379
Date: 09/23/2009
Pages: 38
Title: THIRD FIVE-YEAR REVIEW REPORT FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: MAP
FORM
CHART / TABLE
REPORT

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY
	Name	**Organization**

Region ID: 02
Doc ID: 113247
Bates: R2-0005380 **To:** R2-0005512
Date: 03/01/2010
Pages: 133
Title: NATIONAL REMEDY REVIEW BOARD INFORMATION PACKAGE FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT
CHART / TABLE
LETTER
FIGURE

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY
	Name	**Organization**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 113248
Bates: R2-0005513 **To:** R2-0005516
Date: 04/23/2010
Pages: 4
Title: NATIONAL REMEDY REVIEW BOARD RECOMMENDATIONS MEMORANDUM FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: MEMORANDUM

	Name	Organization
Author:	LEGARE, AMY R	EPA

	Name	Organization
Addressee:	MUGDAN, WALTER E	EPA, REGION 2

Region ID: 02
Doc ID: 114086
Bates: R2-0005517 **To:** R2-0005718
Date: 10/07/2010
Pages: 202
Title: SUMMARY MEMO, SITE WIDE CHARACTERIZATION PROGRAM FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT
CHART / TABLE
MEMORANDUM
FIGURE

	Name	Organization
Author:	,	O BRIEN & GERE ENGINEERS INC

	Name	Organization
Addressee:	,	WYETH HOLDINGS CORPORATION

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 113246
Bates: R2-0005719 **To:** R2-0005760
Date: 07/19/2011
Pages: 42
Title: ADMINISTRATIVE SETTLEMENT AGREEMENT AND ORDER ON CONSENT FOR REMOVAL ACTION FOR THE AMERICAN CYANAMID COMPANY SITE - DOCKET NO. CERCLA-02-2011-2015
Doc Type: MAP
SETTLEMENT AGREEMENT
CHART / TABLE
LEGAL DOCUMENT

	Name	Organization
Author:	KEMP, STEVEN F	WYETH HOLDINGS CORPORATION
	MUGDAN, WALTER E	EPA, REGION 2

Name	Organization

Region ID: 02
Doc ID: 113249
Bates: R2-0005761 **To:** R2-0005766
Date: 10/17/2011
Pages: 6
Title: NATIONAL REMEDY REVIEW BOARD RESPONSE MEMORANDUM FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: MEMORANDUM

	Name	Organization
Author:	FRISCO, JOHN	EPA

	Name	Organization
Addressee:	LEGARE, AMY R	EPA

Region ID: 02
Doc ID: 114087
Bates: R2-0005767 To: R2-0005818
Date: 02/01/2012
Pages: 52
Title: COMMUNITY INVOLVEMENT PLAN FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: PLAN
CHART / TABLE
FIGURE

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

	Name	Organization
Addressee:	,	PFIZER, INC.

Region ID: 02
Doc ID: 113250
Bates: R2-0005819 To: R2-0007075
Date: 02/09/2012
Pages: 1257
Title: SITE WIDE FEASIBILITY STUDY FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: REPORT
CHART / TABLE
FIGURE

	Name	Organization
Author:	ROLAND, STEVEN J	O BRIEN & GERE ENGINEERS INC

	Name	Organization

Region ID: 02
Doc ID: 114975
Bates: R2-0007076 To: R2-0007107
Date: 02/15/2012
Pages: 32
Title: PROPOSED PLAN FOR THE AMERICAN CYANAMID COMPANY SITE
Doc Type: PLAN

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

	Name	Organization

ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/19/2012 **Region ID: 02**

Site Name: AMERICAN CYANAMID CO
CERCLIS: NJD002173276
OUID: 04
SSID: 022H
Action:

Region ID: 02
Doc ID: 141608
Bates: R2-0007108 **To:** R2-0007108
Date: 02/16/2012
Pages: 1
Title: US EPA INVITES PUBLIC COMMENT ON THE PROPOSED PLAN FOR OU4 FOR THE AMERICAN CYANAMID SUPERFUND SITE
Doc Type: NOTICE

	Name	Organization
Author:	,	US ENVIRONMENTAL PROTECTION AGENCY

Name	Organization

APPENDIX IV: STATE LETTER OF CONCURRENCE

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Site Remediation Program
Floor 6 East, P.O. Box 420, Mail Code 401-06
401 East State Street, Trenton, NJ 08625

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

Mr. Walter Mugdan, Division Director
USEPA-Region 2
290 Broadway, Floor 19
New York, NY 10007-1866

September 20, 2012

Re: American Cyanamid (Wyeth/Pfizer) Superfund Site
Bridgewater Township, Somerset County
Preferred Identification Number: 001000

The New Jersey Department of Environmental Protection (Department) has reviewed the September 2012 Site-wide (excluding Impoundments 1 & 2), Operable Unit 4, Superfund Record of Decision (ROD) prepared by the United States Environmental Protection Agency (EPA). The Department concurs with the selected remedy (Alternative 4A).

The selected remedy was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act, as amended. This decision is based on the Administrative Record file for this site. The response action selected in this ROD is necessary to protect the public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment.

The selected remedy, Remedial Alternative (4A), consists of consolidation, treatment, solidification, and capping along with hydraulic control and treatment of groundwater. The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action, is cost effective, and uses permanent solutions and treatment technologies to the maximum extent practicable.

NJDEP appreciates the opportunity to participate in the decision making process to select an appropriate remedy. If you have any questions, please call me at 609-292-1250.

Sincerely,

David Sweeney
Assistant Commissioner
Site Remediation Program

C: Mr. Haiyesh Shah-NJDEP-SRP-BCM

APPENDIX V: RESPONSIVENESS SUMMARY

Introduction

This Responsiveness Summary provides a summary of the public's comments and concerns regarding the Proposed Plan for Operable Unit 04 of the American Cyanamid Superfund Site (Site), and EPA's responses to those comments.

All comments summarized in this document have been considered in EPA's final decision for the selection of the remedy for the Site.

This Responsiveness Summary is divided into the following sections:

I. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS
This section provides the history of community involvement and interests regarding the Site; and

II. COMPREHENSIVE SUMMARY OF MAJOR QUESTIONS, COMMENTS, CONCERNS AND RESPONSES
This section contains summaries of verbal and written comments received by EPA at the public meeting and during the public comment period, and EPA's responses to these comments.

The last section of this Responsiveness Summary includes attachments, which document public participation in the remedy selection process for the Site. They are as follows:

Attachment A contains the Proposed Plan that was distributed to the public for review and comments;

Attachment B contains the public notice that appeared in the *Courier News* on February 16, 2012;

Attachment C contains the transcript from the public meeting held on March 8, 2012 at the Somerset County Technical and Vocational High School; and

Attachment D contains the public comments received during the public comment period. (Note that personal information, such as the names, email addresses, mailing addresses and phone numbers of private residents, contained in the letters and emails were redacted to protect the privacy of the commenters).

EPA received written comments from 39 individuals or parties during the public comment period.

ACRONYM LIST

ARAR	Applicable or Relevant and Appropriate Requirement
BEA	Baseline Endangerment Assessment
BERA	Baseline Ecological Risk Assessment
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DSW	Discharge to Surface Water
EPA	Environmental Protection Agency
ESD	Explanation of Significant Differences
FFS	Focused Feasibility Study
FS	Feasibility Study
LTTD	Low Temperature Thermal Desorption
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NJDEP	New Jersey Department of Environmental Protection
NJPDES	New Jersey Pollution Discharge Elimination System
NPL	National Priorities List
NRRB	National Remedy Review Board
OIG	Office of the Inspector General
O&M	Operation and Maintenance
OSWER	Office of Solid Waste and Emergency Response
OU	Operable Unit
PRP	Potentially Responsible Party
PTW	Principal Threat Waste
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
ROD	Record of Decision
RD	Remedial Design
S/S	Solidification/Stabilization
SVOC	Semi-Volatile Organic Compound
SWQS	Surface Water Quality Standard
TAG	Technical Assistance Grant
UCS	Unconfined Compressive Strength
VOC	Volatile Organic Compound
WQBEL	Water Quality Based Effluent Limit

I. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS

Since the placement of the American Cyanamid site on the National Priorities List (NPL) in 1983, public interest in the Site has been very high. The U.S. Environmental Protection Agency (EPA) has strongly encouraged and received public input throughout the history of the Site. A Community Involvement Plan was established in 1988 by the New Jersey Department of Environmental Protection (NJDEP). This 1988 Community Involvement Plan outlined specific outreach tools to facilitate communication with the community in the decision-making process and was implemented for a series of records of decision (RODs) in the 1990s. An updated Community Involvement Plan was established in January 2011 to serve as a guide for the current Site owner (Pfizer, Inc.) and EPA in sharing information and obtaining public input on the Site-wide remedy for the Site. This Community Involvement Plan includes outreach tools to ensure a transparent and accessible decision-making process and meaningful community stakeholder participation.

In 1992, EPA awarded a technical assistance grant (TAG) to CRISIS. Since that time, CRISIS has been the primary community based group serving as a liaison between the NJDEP, EPA and the community. CRISIS has, and continues to, consistently participate in monthly project calls and serves in a technical review capacity on behalf of the community. CRISIS membership includes representatives from Bridgewater Township, Bound Brook Borough, Somerset County and other community groups. CRISIS regularly engages local media outlets to ensure project information is broadcast widely. In addition, CRISIS maintains an email listserv to disseminate project-related information, including the dates of upcoming meetings and milestones.

On February 16, 2012, EPA released the Proposed Plan and supporting documentation for this action, operable unit 4 (OU4), to the public for review. EPA made these documents available to the public in the administrative record repositories maintained at the EPA Region 2 office located at 290 Broadway, New York, New York, the NJDEP Office of Records at 401 East State Street, Trenton, New Jersey and the Bridgewater Township Library at 1 Vogt Drive, Bridgewater, New Jersey. A subset of these documents was made available online (http://www.epa.gov/region02/superfund/npl/american_cyanamid/docs.html). EPA published a notice of availability for these documents in the *Courier News*, and provided a public comment period from February 16, 2012 to March 31, 2012.

On March 8, 2012, EPA held a public meeting at the Somerset County Technical and Vocational High School in Bridgewater Township to inform local officials and interested citizens about the Superfund process, to review the planned remedial activities at the Site and to respond to questions from area residents and other attendees.

Several attendees at the March 8th meeting asked that EPA extend the comment period beyond 45 days. At the March 8th meeting, EPA announced that it would extend the comment period 45 days beyond March 31, 2012. EPA also announced the public comment period extension on EPA's American Cyanamid website on March 9, 2012.

The sign-in sheet from the March 8, 2012 public meeting identified that 183 persons, not including federal and state officials, attended the meeting. The meeting attendees included residents, interest groups, local business representatives, elected officials and members of the Site owner's project team and their consultants.

EPA received written comments from 39 individuals or parties in addition to verbal comments made during the public meeting. The transcript and written public comments are found in Attachments C and D, respectively. Responses to the comments received at the public meeting are included in this Responsiveness Summary. Many of the comments simply expressed support of the Proposed Plan, without providing further comment requiring a response from EPA.

II. COMPREHENSIVE SUMMARY OF MAJOR QUESTIONS, COMMENTS, CONCERNS AND RESPONSES

PART 1. Written Comments

Support for Alternative 4A

1.1 Several commenters, such as, but not limited to elected officials, the Site owner, interest groups and residents, expressed support for Alternative 4A.

Response: Comment noted.

Opposition to Alternative 4A

2.1 Several commenters provided comments expressing opposition to Alternative 4A, such as it is not protective of human health and the environment, is inappropriate, utilizes inexpensive, outdated technologies, is not a permanent remedy, is not effective over the long-term and is not in the best interest of public health.

Response: The selected remedy for the 435-acre American Cyanamid Superfund site will be protective of human health and the environment, will comply with applicable or relevant appropriate requirements (ARARs), will be cost-effective and will utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. The selected remedy provides the best balance of tradeoffs among the alternatives based on the information available to EPA at this time. EPA followed current guidance when developing remedial alternatives in the Site-wide Feasibility Study (FS). This requires: identifying remedial action objectives (RAOs); identifying potential treatment, resource recovery and containment technologies that will satisfy these objectives; screening the technologies based on their effectiveness, implementability and cost; and assembling technologies and their associated containment or disposal requirements into alternatives for the contaminated media at the Site. Specifically, the alternatives were developed to address contaminated media and their specific locations within the American Cyanamid site.

Once the potential alternatives were developed, a number of the options were screened out due to their ineffectiveness, poor implementability and/or cost, consistent with EPA guidance. For the remaining alternatives, a detailed analysis was performed. EPA determined that sufficient information was available for these alternatives to be evaluated in detail with respect to nine evaluation criteria identified in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). These nine criteria include:

- overall protection of human health and the environment;
- compliance with ARARs;
- long-term effectiveness and permanence;
- reduction of toxicity, mobility or volume;
- short-term effectiveness;
- implementability;
- cost;
- state acceptance; and
- community acceptance.

The alternatives were then analyzed individually against each criterion and compared against one another to determine their respective strengths and weaknesses and to identify the key trade-offs that must be balanced for the Site. As a result, EPA concluded that Alternative 4A is the appropriate remedy consistent with CERCLA.

Regarding comments that Alternative 4A is not an effective long-term solution, EPA has concluded that Alternative 4A meets EPA's criteria for long-term effectiveness and permanence. When evaluating the long-term effectiveness and permanence of a remedy, EPA considers many factors, including the magnitude of potential residual risk from materials remaining at the conclusion of the remedial activities. The characteristics of the remaining materials are considered to the degree that they remain hazardous, taking into account their mobility, toxicity and volume, as well as their propensity to bioaccumulate. When evaluating long-term effectiveness and permanence, EPA also considers the adequacy and reliability of controls, such as containment systems and institutional controls, necessary to manage materials left on-site.

Regarding the comment that Alternative 4A is inexpensive and outdated, EPA believes that the cost-effectiveness and proven success of the stabilization/solidification (S/S) component of the remedy is a positive element. The fact that in-situ S/S is one of the most common source control treatment technologies and has been utilized for decades allows the observance of the long-term effectiveness and protectiveness of this technology. The cost-effectiveness and long-term effectiveness were two of the nine evaluation criteria utilized by EPA to compare the remedial alternatives and select a remedy.

2.2 A commenter asked why the lowest cost and least protective technology is being offered as the only practical and cost-effective solution.

Response: At approximately $205 million, the selected remedy was not the lowest cost alternative. For example, the cost estimates for Alternatives 3 and 4 are $138 million and $180 million, respectively. The selected remedy will be protective of both human health and the environment. All alternatives presented in the Site-wide FS are required to meet the threshold evaluation criteria of overall protection of human health and the environment and compliance with ARARs. The "Detailed Analysis of Alternatives" section of the Site-wide FS provides a detailed comparison of all of the remedial alternatives with EPA's nine evaluation criteria, which includes cost-effectiveness and the protection of human health and the environment.

2.3 A commenter stated that cost should not be a consideration when selecting a remedy.

Response: When selecting a remedy, EPA considers the factors set out in CERCLA §121, 42 U.S.C. §9621, by conducting a detailed analysis of the viable remedial response measures pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulation (CFR) 300.430(e)(9)(iii) and Office of Solid Waste and Emergency Response (OSWER) Directive 9355.3-01. The detailed analysis consists of an assessment of the individual response measure against each of nine evaluation criteria and a comparative analysis focusing upon the relative performance of each response measure against the criteria. The cost of an alternative, which includes the estimated capital costs, the operation and maintenance (O&M) costs and the net present worth value of the capital and O&M costs, is one of the five "primary balancing criteria" that EPA uses to assess response measures. Primary balancing criteria are factors with which tradeoffs between response measures are assessed so that the best option will be chosen, given Site-specific data and conditions. A Detailed Analysis of Alternatives can be found in the Site-wide FS Report.

Flooding & Capping Comments

3.1 Several commenters stated that the containment of contaminants is an appropriate component for remedial action at the Site. One commenter noted that caps designed, constructed and maintained in accordance with current good engineering practices and regulatory guidance have functioned as required over time, in a manner that eliminates a potential exposure pathway to Site materials, and poses no unacceptable risk to human health and the environment. The commenter also noted that the design and construction of each cap system must be tailored to each site's unique circumstances, and with selection of proven construction materials, both natural and synthetic, along with rigorous construction quality control, a cap system can be expected to perform over time, when subject to routine post-construction inspection and maintenance. The commenter acknowledged that regular inspections and maintenance consistent with best practices will be conducted to ensure that the caps perform as intended. It is also noted that the design of the caps for the Site will be designed and constructed to protect against all Site-specific hazards which may pose a threat to their integrity, such as flooding, inadequate drainage, slope instability, erosion, freeze/thaw cycle effects, surface vegetation and any other risks associated with being located in a flood hazard area. The commenter noted that caps can be designed and maintained to withstand frequent flooding and that there are several examples of cover and cap systems being installed within a flood plain. It is noted that all caps would be designed for a 500-year flood event.

Response: Comment noted. EPA agrees that cap and cover systems can be successfully implemented within a flood hazard area with the appropriate design and maintenance. The factors mentioned above will be considered in the remedial design (RD) phase.

3.2 Several commenters expressed concern over the design of the capping systems and the practicability of capping in a flood hazard area. Several commenters also expressed concern over the permanence, cost-effectiveness or protectiveness of capping.

Response: All engineered caps will be designed and constructed to withstand a 500-year flood event at a minimum and to incorporate all Site-specific hazards that pose a threat to their integrity. In addition, a strict inspection and maintenance program will be developed as part of the on-going operation plan for the engineered capping systems.

During flood events, the North Area would not regularly be subject to high-velocity water flows. All of the impacted media that are addressed in the Proposed Plan and ROD are located in the North Area, with the exception of Impoundments 13, 17 and 24; however, these three impoundments may be excavated and relocated to the North Area if an ecological risk assessment determines that an unacceptable risk is present. The waste material in the North Area is nearly 500 yards from the Raritan River at the closest point. The North Area is located in the flood fringe area, not the floodway which is the main flowing part of the river during a flood event. The flood fringe area is not typically subject to extensive erosive forces, even during large flood events such as Hurricane Irene. However, if portions of the capped areas and the flood control berm were observed to be subject to erosive forces during future flood events, modifications would be evaluated and implemented, as necessary, to account for these forces and to ensure the durability of the capped areas and the berm.

Engineered capping systems have been successfully utilized in flood hazard areas at a number of Superfund sites. The most relevant example is the Sharkey Landfill Superfund site in Parsippany, New Jersey, which consists of a 26-acre landfill located on an island in the middle of the Rockaway River. A portion of the remedy for this site included the installation of an engineered capping system over this 26-acre area. The engineered capping system was completed in March 2004 and was protected by armoring above the river's base flow. This engineered capping system has successfully withstood several major flood events since its completion in 2004, including Hurricane Irene and Tropical Storm Lee in 2011, with no damage or release of contaminants to the environment.

Regarding the concerns over the permanence, cost-effectiveness and protectiveness of capping, the Proposed

Plan and this ROD have both concluded that the selected remedy would be protective of human health and the environment, comply with ARARs, be cost-effective and utilize permanent solutions and alternative treatment technologies to the maximum extent practicable.

3.3 A commenter stated that the capping systems must be designed, engineered and constructed for the maximum resistance to floodwaters, regardless of the cost to the Site owner.

Response: As discussed in the response to Comment 3.2 above, all engineered capping systems constructed as part of the selected remedy will be designed to withstand the effects of a 500-year flood event at a minimum. The details of the design for the engineered capping systems will be developed during the RD phase.

3.4 A commenter stated that the remedy must be designed and implemented without impacts to the flooding of the Raritan River.

Response: As noted in the response to Comment 3.2, all engineered capping systems will be constructed to withstand the effects of a 500-year flood event at a minimum. The details of the design for the engineered capping systems will be developed during the RD phase. EPA will consider potential flooding impacts throughout the design of the selected remedy.

3.5 A commenter recommended that all impacted areas be able to withstand a 500-year storm, in terms of leaching, scouring, erosion or uplifting.

Response: As discussed in the response to Comment 3.2 above, all engineered capping systems constructed as part of the selected remedy will be designed to withstand the effects of a 500-year flood event at a minimum. The details of the design for the engineered capping systems will be developed during the RD phase.

3.6 Several commenters stated that the flood control berm should be improved to protect impoundments and better control large storm events. One commenter specifically stated that the flood control berm should be improved to withstand a 500-year flood, both in terms of height and strength of the berm.

Response: As a result of Hurricane Irene in August 2011, several activities have been completed or are ongoing that will reduce impacts from future flooding events, improve pre-flood preparedness efforts and reduce the need for post-flood response efforts. The flood control berm has been improved in several areas and critical infrastructure has been redesigned/relocated to reduce flood impacts to Site operations. Once the remedy outlined in this ROD has been fully implemented, maintaining the berm structure would not be necessary. In fact, eliminating the berm completely will result in an increase to the Site's flood storage capacity, thereby positively affecting the surrounding communities. As discussed in the response to Comment 3.2, all engineered capping systems constructed as part of the selected remedy will be designed to withstand the effects of a 500-year flood event at a minimum. A strict inspection and maintenance program will also be developed as part of the ongoing operation plan for the engineered capping systems.

3.7 Several commenters noted that the filling of a flood plain is subject to both New Jersey and federal regulations. The commenters noted that these regulations specify that there can be no net fill in a flood zone. Several commenters also discussed the original terminologies used to divide the Site and noted that the entire Site lies within a flood hazard area. In addition, several commenters stated that the claims that there will be no net filling are not true because they fail to recognize that the entire area lies within the flood plain.

Response: It has been clarified and recognized previously that the entire Site lies within the flood hazard area of the Raritan River, with the exception of the on-site disposal facility (referred to as the Impoundment 8 Facility). At the March 8, 2012 Public Meeting, EPA confirmed that the entire Site is subject to flooding on a regular basis. In the past, the Site was generally divided into two main portions, referred to as the Main Plant and the Flood Plain. The Main Plant area referred to the portion of the Site within a flood control berm, where manufacturing activities were conducted historically. The Flood Plain area referred to the portion of the Site outside of the flood control berm. These terms were derived when the facility was operational and fail to recognize that both of these areas lie within the flood hazard area of the Raritan River. EPA has re-designated the Site into five new areas for ease of understanding. As shown on Figure 2 in Appendix I of the OU4 ROD, the Site is now divided into the following five areas: North Area, South Area, West Area, East Area and the Impoundment 8 Facility. The North Area, which was referred to as the Main Plant area in previous documents, refers to that portion of the Site property within a flood control dike. The portion of the Site previously referred to as the Flood Plain area has been separated into the following three areas: West Area, South Area and East Area. The West Area refers to the portion of the Site bounded by the Somerset County Recycling Center to the north, the Raritan River to the west, the Port Reading rail line to the south and the flood control berm to the east. The South Area refers to the portion of the Site located west of Interstate-287 between the Port Reading rail line and the Raritan River. The East Area, which is the only portion of the Site located in the Borough of Bound Brook, refers to the small triangular portion of the Site located to the east of Interstate-287. The Impoundment 8 Facility, which is designated as a corrective action management unit (CAMU) under the Resource Conservation and Recovery Act (RCRA), is located to the northwest of the Site across Polhemus Lane. The entire Site lies within the flood hazard area of the Raritan River, with the exception of the Impoundment 8 Facility. The "Site Name, Location and Description" section in the Decision Summary of the ROD includes an explanation of these new areas and explicitly acknowledges that the entire Site lies within the flood hazard area of the Raritan River, with the exception of the Impoundment 8 Facility. Please see the response to Comment 3.9 in the written comments section, which addresses concerns over net fill requirements and the loss of flood storage capacity.

3.8 The Site owner noted that the Site can be capped without a significant loss in flood storage capacity. The Site owner cited several specific examples of ways that the flood storage capacity could be increased so that there is little to no net loss of flood storage. It was also acknowledged that the design will follow New Jersey Flood Hazard Control Act Rules regarding filling in a flood hazard area.

Response: Comment noted.

3.9 Several commenters expressed concern over the placement of fill throughout the Site as part of the selected remedy.

The commenters expressed concern that the addition of fill would reduce the Site's flood storage capacity and exacerbate flooding in the local community. Several commenters also noted that there can be no net filling of a flood hazard area under New Jersey and federal regulations. One commenter stated that the appropriate means to evaluate the impact of the Proposed Plan's flood plain filling is to use the HEC-RES model, which is a standard tool used by the U.S. Army Corps of Engineers to evaluate the impacts of changes on a river basin's flooding. The commenter stated that a comprehensive assessment of the flood plain impacts must be modeled to ensure that the selected remedy does not exacerbate flooding in the Raritan River Basin.

Response: It is currently estimated that the flood storage capacity of the Site for a 500-year flood would be about 1.5 billion gallons. Current estimates indicate that the selected remedy will include the placement of approximately 578,000 cubic yards of clean fill, which is equivalent to about 116 million gallons of water. Therefore, this would result in less than an 8 percent decrease in the Site's flood storage capacity if no actions were taken to mitigate the placement of clean fill. A major goal of the selected remedy's design will be to minimize the loss of flood storage at the Site. While capping and filling will reduce the Site's flood storage capacity, other aspects of the remedy will create flood storage capacity, such as the construction of a natural stormwater management system and the potential removal of the Site's flood control berm. Even if minor changes to the Site's flood storage capacity were to occur, the Site would have little to no impact on downstream flood elevations and the surrounding community. A previous preliminary evaluation conducted by the Site owner indicated that the potential removal of the Site's flood control berm (or portions of it) would actually increase the Site's flood storage capacity by over 200 million gallons for more common flood events. The design of the selected remedy will comply with the substantive requirements of the New Jersey Flood Hazard Control Act.

3.10 A commenter referenced page 94 of the Site-wide FS, which states "a permit for placement of the fill for capping within a flood plain has already been obtained from NJDEP." The commenter stated that the permits obtained from NJDEP are for the area outside the berm and that NJDEP has not provided a permit for the importation of 600,000 cubic yards of fill into the bermed area. The commenter asked for clarification on the permits that have been obtained for filling in a flood plain.

Response: On January 30, 2008, a stream encroachment permit was obtained by the Site owner granting permission to place temporary stockpiles of fill in the flood hazard area in connection with a future CERCLA remedial program for installation of engineered protective covers as part of a Site-wide remedy. Therefore, the Site-wide FS correctly states that a permit has been obtained for the placement of fill for capping within a flood plain. This 2008 permit was originally set to expire in January 2013, but an extension was granted under the Permit Extension Act through June 2013. In order for the Site owner to utilize this permit for the placement of fill in the flood plain, the Site owner would need to begin Site improvements (construction) prior to the permits' expiration date. If construction of the Site-wide remedy does not begin prior to the expiration date, it is anticipated that the Site owner will be required to work with EPA and NJDEP to secure a permit equivalence for the placement of fill in the flood plain. The ROD contains details on the status of the statutory requirements for the placement of fill for the selected remedy.

To clarify the commenter's reference to volume of clean fill to be imported to the Site under the selected remedy, the cost estimates in Appendix G of the Site-wide FS indicate that approximately 578,000 cubic yards of fill would be placed throughout the Site.

3.11 A commenter noted that Table 16 of the Site-wide FS presents "ARAR's, Criteria and Guidance" for evaluating and selecting a remedy. The commenter noted that flood plain management is identified as a "Standard Requirement" to be considered and Executive Order #11988 requires an evaluation of alternatives that impact flood plains, and a flood plain value assessment. The commenter stated that no discussion has been provided on how the flood plain ARAR would be met or what the potential impact would be if it were not met. The commenter stated that this was only partially fulfilled.

Response: Comment noted. The RD will address flood plain impacts to ensure that the remedy meets the requirements set forth in Executive Order #11988.

3.12 Several commenters noted that the U.S. Army Corps of Engineers is actively working on flood control projects in the Raritan River Watershed to help alleviate flooding in Manville, Bound Brook, Bridgewater and the surrounding towns. The commenters suggest that the Site would be a natural fit for a regional flood control project and can be an environmental benefit to the region if the proper remedy is selected.

Response: EPA is aware of the US Army Corps of Engineers' (USACE) project within the Raritan River watershed and EPA plans to discuss the remedy with USACE during the RD phase to accommodate any overlapping work, if possible. As noted in the response to Comment 3.9, a major goal of the selected remedy's design will be to minimize the loss of flood storage at the Site. The selected remedy can be designed to minimize the loss of flood storage so that it would have little to no impact on downstream flood elevations and the surrounding community.

3.13 A commenter asked if the presence of standing water over the capped areas provides a hydraulic head to the movement of impacted waters.

Response: In addition to the installation of the on-site capping systems, a drainage system would be installed throughout the Site. The final Site topography will be shaped to handle runoff conditions from both rain and flooding, thereby reducing the likelihood of any standing water on-site.

3.14 A commenter noted that burrowing animals may pierce the capping systems and expose waste to the surface. The commenter stated that the Proposed Plan must ensure that exposure via this mechanism would not occur.

Response: The engineered capping system will have an O&M plan to address these possible intrusions. In addition, this O&M plan will include Site-specific hazards that may pose a threat to the capping and/or remedies in general. The details of the maintenance and monitoring requirements for the engineered capping systems will be addressed in the RD phase.

3.15 A commenter stated that the remedial design must specify a means to secure the S/S material under the soil caps to prevent contaminants from being washed out in serious, repeated floods.

Response: The principal threat waste (PTW) material slated for in-situ S/S within Impoundments 3, 4 and 5 will undergo an extensive mixing and stabilization process. The in-situ S/S treatment of this material will be designed to immobilize the waste, thereby fixing it in place and limiting the migration of contaminants. Materials that are treated via in-situ S/S will be required to meet several performance measures to verify the effectiveness of the remedy. In areas requiring treatment via in-situ S/S, an impermeable vapor control cap would be installed to reduce further the potential for contaminants to migrate. The details of the design of the engineered capping systems will be developed during the RD phase. It is anticipated that the design would consist of standard construction technologies, such as the addition of amendments, stabilizing agents and/or the installation of a physical structure (i.e., geogrids).

3.16 Several commenters expressed concern over how flooding would affect the Site's bedrock groundwater pumping system. The commenters also made several more specific recommendations regarding the design of the groundwater pumping system to ensure that it is not compromised by adverse weather, flood or power interruption.

Response: In response to the Hurricane Irene-related flooding in August 2011, the existing bedrock groundwater containment system was modified so that operations could continue without interruption should another extreme flood event occur. Critical infrastructure, such as extraction system controls and the electrical distribution system, were redesigned above anticipated future flood elevations. The gravity discharge line from the bedrock extraction wells to the Building 104 pump station was upgraded to include a pressure force main bypass that will enable extraction well operations in a flood event. The pumps for the extraction wells were replaced with submersible pumps that can continue to function throughout a flood event. A similar system would be installed and operated as part of the Site-wide groundwater remedy.

Alternatives & Technologies Not Selected in this ROD

4.1 Several commenters expressed opposition to the selection of a remedy involving low temperature thermal desorption (LTTD). The commenters cited several specific reasons why LTTD would be inappropriate for the Site, including LTTD's inefficiency for the waste materials at the Site and the potential increase in worker and community exposure compared to in-situ alternatives.

Response: Comment noted. EPA agrees that LTTD would not be an effective treatment technology for the waste materials to be addressed by the remedy under consideration (OU4).

4.2 Several commenters expressed support for Alternative 7 or a modified version of Alternative 7. Several commenters stated that LTTD has been successfully implemented at other Superfund sites, specifically at the Cornell-Dubilier site, with similar types of waste without disturbing the community.

Response: It is true that LTTD has been selected as an appropriate remedy at other Superfund sites. However, EPA does not believe that it would be effective in remediating the specific waste materials to be addressed in OU4. As identified in the ROD, Alternative 7 includes the excavation and on-site treatment using LTTD for approximately 66 acres of the Site. This alternative was not selected because the particular waste materials to be addressed contain high concentrations of tars and other organics, elevated sulfur levels, large quantities of heterogeneous debris and have a high moisture content, all of which limit the effectiveness of LTTD.

In order to implement LTTD technologies successfully, the materials would require a significant amount of pre-treatment to control air emissions and are anticipated to result in more than a 40 percent increase in the volume of materials requiring treatment due to post-excavation "fluff" factor and reagent addition. Extensive materials handling would also be required prior to LTTD treatment due to the high moisture content and heterogeneity of the materials in Impoundments 3, 4 and 5. In addition, the results of previous field studies conducted at the Site indicate that the air emissions generated from excavation, pre-treatment and treatment would be difficult to contain within acceptable levels. LTTD was tested on Impoundment 3, one of three impoundments requiring remediation under the Proposed Plan, and was not effective due, in part, to the high levels of air emissions, even with extensive controls.

EPA recognizes that LTTD was implemented at the Cornell-Dubilier site; however, the waste materials treated at Cornell-Dubilier are not similar to the waste materials at the American Cyanamid site in terms of moisture content, sulfur levels, heterogeneity and the presence of high concentrations of tarry substances. In addition, LTTD technologies have not generally been used on a large scale to treat materials similar to those found at the American Cyanamid site. The 2004 ROD for the Cornell-Dubilier site called for the excavation and treatment of approximately 87,300 cubic yards of contaminated soil using LTTD, while Alternative 7 would involve the excavation and LTTD treatment of over 730,000 cubic yards of contaminated material, which represents more than an 8-fold volume increase. In addition, it is estimated that the 730,000 cubic yards of material that would be treated with LTTD under Alternative 7 would increase approximately 43% to over 1.05 million cubic yards due to post-excavation "fluff" and reagent addition required for treatment.

Under Alternative 7, over 1.05 million cubic yards of contaminated material would be transported to the Impoundment 8 Facility following treatment with both LTTD and ex-situ S/S. The volume of this treated material is significantly greater than the estimated remaining capacity of 650,000 cubic yards in the Impoundment 8 Facility. In addition, utilizing the Impoundment 8 Facility to its maximum capacity would result in more than a 60-foot increase in the height of the landfill to over 100 feet, which would have a significant aesthetic impact on the surrounding community. The current height of the RCRA (Resource Conservation and Recovery Act) facility does not cause an obstruction to the sightlines of the surrounding communities. EPA believes that a significant increase in the height of this landfill would negatively impact the surrounding community and cause considerable disturbance to nearby residents, particularly those in the Finderne section of Bridgewater, New Jersey.

In addition, the implementation time frame of 20 years for Alternative 7 is also significantly longer than the implementation time frame of 10 years for Alternative 4A. There is also a greater potential for an increase in the implementation time frame for Alternative 7 due to the possible road reconstruction necessities to handle truck traffic, extensive materials handling, challenges in controlling air emissions within acceptable levels and the extensive pre-design testing required for LTTD. The 10+ year difference in the implementation time frames also exposes the Site to a greater vulnerability to flooding during construction.

4.3 Several commenters expressed support for an alternative that utilizes LTTD in combination with other technologies, such as bioremediation and off-site disposal.

Response: A number of alternatives were developed in the Site-wide FS that included LTTD in combination with other technologies, such as bioremediation and off-site disposal.

Alternatives 7 and 8 include a combination of LTTD and ex-situ S/S technologies to address various contaminated areas of the Site, with some of the treated materials being disposed in the Impoundment 8 Facility. Alternatives 9 and 10 utilize a combination of bioremediation and ex-situ S/S to address various areas of contamination, with a portion of the treated materials also being disposed in the Impoundment 8 Facility. Alternative 11 includes a combination of LTTD and ex-situ S/S technologies, and also requires the off-site treatment and disposal of some materials. This alternative also utilizes the Impoundment 8 Facility for the disposal of treated materials, as well as the off-site disposal of some treated and untreated materials.

Enhanced bioremediation was also specifically included in the identification and screening of technologies process, as indicated in the Site-wide FS. Enhanced bioremediation was included as a representative process option for both impoundment contents and Site-wide soils in the Identification and Screening of Technologies Report, where it was determined that it would need to be combined with other technologies to address the contaminants at the Site effectively. Enhanced bioremediation was included in the development of Alternatives 9 and 10; however, these alternatives were not retained for further evaluation in the screening process for a number of reasons. The effectiveness of enhanced bioremediation was evaluated and determined to be inappropriate for both impoundment contents and soils due to the technology’s inability to treat inorganic contaminants adequately. Enhanced bioremediation effectively treats nonhalogenated solvents and other organic chemicals, but is not generally applicable to the treatment of the inorganic contaminants found at Site. Furthermore, a previous 1998 ROD at the Site included biotreatment as a component of the selected remedy and it was later determined that this technology was technically infeasible for the type of contamination at the Site. For more information on the identification and screening of technologies and the development and screening of alternatives, please see Exhibits 1 and 2 of the Site-wide FS.

Alternatives involving off-site disposal generally have longer implementation time frames and higher costs due to the significant challenges in controlling air emissions throughout extensive excavation activities. A remedy involving off-site disposal would also result in the transportation of large quantities of highly contaminated material through the community.

4.4 Several commenters noted that a permitted, hazardous waste disposal facility exists on-site, but is not being utilized to its permitted capacity to reduce the amount of waste left on the Site. Several commenters recommended that EPA utilize the Impoundment 8 Facility for the disposal of the wastes at the Site.

Response: The maximum allowable capacity of the Impoundment 8 Facility is approximately 1 million cubic yards under the RCRA permit. The facility is currently utilized to about 35 percent of the maximum capacity and is roughly 50 feet in height on average. The volume of material expected to be treated under the selected remedy would significantly increase the height of this facility. If the Impoundment 8 Facility were utilized to its maximum capacity, it would result in more than a 60-foot increase in the height of the landfill to over 100 feet, causing a significant obstruction to the sightlines of the surrounding communities, particularly nearby residents in the in the Finderne section of Bridgewater, New Jersey. In addition, the selected remedy does not require the off-site disposal of any waste materials since contaminated materials would be treated and/or capped. The selected remedy has less impact on the community because it does not require the utilization of the remaining capacity of the Impoundment 8

Facility, in addition to not requiring the transportation of hazardous materials through the community.

4.5 A commenter noted that the 1998 ROD successfully treated and removed a “stringy, tacky tar” from Impoundments 4 and 5 under a Fuel Blending/Recycling program. The commenter stated that the characteristics of those tars appear similar to the tars and organic wastes that the Proposed Plan intends to address by in-situ S/S. The commenter suggested that these wastes could be destroyed as opposed to being contained under the Proposed Plan. The commenter asked why fuel blending/recycling was not considered in the Site-wide FS.

Response: The commenter’s characterization assumptions between the materials are incorrect. Between July 1991 and October 1994, approximately 3.8 million gallons of pumpable tars from Impoundments 4 and 5 were removed from the Site and treated through fuel blending operations and recycling/reuse. The tar and sludge material removed under this program represented the total amount of flowable material present in these impoundments. While the materials currently present in Impoundments 3, 4 and 5 have a high moisture content, they are not pumpable as the materials removed under the early 1990s Fuel Blending/Recycling Program were. Excavation and off-site incineration/recycling were considered as a component of Alternative 11 in the Site-wide FS but were not selected.

4.6 A commenter noted that off-site incineration was not given serious consideration in the Site-wide FS. The commenter stated that the Site has access to a major freight rail line and waste could be transported by rail to an off-site, permitted hazardous waste incinerator, such as Waste Management in Emille, Alabama. The commenter stated that it would have a higher initial capital cost, but no long-term O&M (operation and maintenance) cost.

Response: Off-site incineration was considered in the Site-wide FS and included as a component of Alternative 11. Ultimately, this alternative was not selected by EPA due to the reasons mentioned within the ROD, such as community concerns and the increases in cost and implementation time frames compared to other alternatives. Please see the response to Comment 4.3, which further discusses why EPA did not select a remedy involving off-site disposal. Also, see the “Comparative Analysis of Alternatives” Section in the Decision Summary of the ROD for a further discussion of why Alternative 4A was selected over Alternative 11.

4.7 A commenter asked if on-site thermal destruction had been considered at the Site, citing that it would be the cleanest most time-efficient method for remediating the Site.

Response: On-site thermal destruction, also referred to as incineration, was included in the identification and screening of technologies process, as indicated in the Comprehensive Site-wide FS. On-site incineration was not retained for further consideration in this process based upon past public opposition to it. However, off-site incineration of both impoundment contents and Site-wide soils was retained for further evaluation. Ultimately, off-site incineration of movement control areas was included in Remedial Alternative 11; however, this alternative was not selected by EPA because it did not meet EPA's criteria for short-term effectiveness and implementability. Please see the "Comparative Analysis of Alternatives" section in the Decision Summary of the ROD for a further discussion of this alternative.

4.8 Several commenters questioned the cost estimates for LTTD and in-situ S/S in the Site-wide FS. One commenter specifically questioned the validity of the unit cost for LTTD found in Appendix G of the Site-wide FS.

Response: EPA reviewed the cost estimates for Alternatives 4A and 7 in the Site-wide FS upon receiving the above comment and concluded that the cost estimates for both alternatives are within the accuracy range of -30 to +50 percent of the original estimates. The estimated capital, O&M and present worth cost estimates are based on the best available information at the time.

The unit costs for LTTD utilized in Appendix G of the Site-wide FS are within the range of costs for direct-fired LTTD systems based upon a review of published literature. The costs for indirect-fired LTTD systems, which are anticipated to be required based upon the high organic content of the material, are generally reported to be higher than direct-fired systems. Also, the costs provided in the Site-wide FS for Alternative 7 are sufficiently accurate and may even be underestimated for actual implementation due to the complexities of the extensive materials handling required prior to treatment.

The unit cost for LTTD in Alternative 7 is expected to be significantly higher than the LTTD unit costs at other Superfund sites for a number of reasons. The impoundment contents and soils at the Site have a high organic content and would likely require indirect thermal treatment, which generally has higher costs than direct-fired LTTD systems utilized at other Superfund sites. Intrusive excavation and extensive pre-treatment and materials handling resulting from the moisture content would be required for the implementation of LTTD at the Site, which also contribute to the higher unit cost rates for LTTD in comparison to other Superfund sites. Alternative 7 also involves the off-site disposal of condensate, purge water and debris, as well as the disposal of solid residuals either on-site or off-site. For the reasons cited above, the unit costs for LTTD in Appendix G of the Site-wide FS are believed to be accurate based upon the information available to EPA at this time.

Groundwater & Surface Water Comments

5.1 Several commenters indicated a preference for the construction of an on-site groundwater treatment plant as a component of the remedy as opposed to a reliance on the local municipal wastewater treatment system. Several commenters suggested that EPA had already made the decision to construct an on-site treatment plant.

Response: The Proposed Plan indicated that several groundwater treatment options would be evaluated in the RD phase. However, based upon a number of comments received indicating a preference for the construction of an on-site treatment plant and an EPA review of the treatment options, EPA has decided that the waters collected at the Site will be discharged to surface water following complete on-site treatment. However, if it is determined that this treatment method is not appropriate or feasible, then collected groundwater will either be re-injected into the ground following complete on-site treatment or be discharged to the local sewerage authority directly or following pre-treatment.

5.2 The Site owner recommended that “recharge to groundwater following on-site complete treatment” also be evaluated as a potential discharge option for the treatment of contaminated groundwater. The Site owner stated that this option presents the advantage of reducing the impact on groundwater storage on the State of New Jersey aquifers through on-site replenishment (i.e. recycling groundwater after treatment) and also mentioned that groundwater reinjection can create hydraulic control boundaries at appropriate locations that will slow groundwater movement, and subsequent contaminant transport across the Site.

Response: EPA agrees that "recharge to groundwater following on-site complete treatment" should be included as a potential discharge option. At this time, EPA believes that discharge to surface water following complete on-site treatment is the most appropriate treatment option; however, a different treatment/discharge method can be selected in the RD phase, if it is determined that a different method is more appropriate. Recharge to groundwater following complete on-site treatment has been included as a contingency treatment option in the Decision Summary of the ROD.

5.3 Several commenters expressed concern over the discharge limits of the interim treatment plant constructed under EPA's removal program, as well as the discharge limits of a potential on-site treatment plant for the Site-wide remedy. Several commenters specifically stated that the discharge levels for arsenic and benzene should be set at the New Jersey surface water quality standards (SWQS) of 0.017 and 0.15 micrograms per liter, respectively. A commenter stated that the discharge should be required to satisfy all NJ SWQS and expressed concern that generic, pre-defined, non-site-specific effluent standards would be applied to the interim treatment plant. The commenter stated that if such effluent standards are applied, given the very small amount of assimilative capacity in Cuckel's Brook under critical low flow conditions, stream standards will be violated. The commenter stated that water quality based effluent limits (WQBELs) must be established for this discharge.

Response: An interim groundwater treatment plant was constructed as part of an EPA Removal Action to address groundwater discharges into the Raritan River. A permit equivalency for the interim treatment plant was issued by NJDEP on May 7, 2012 and EPA provided the permit equivalency to the Site owner on May 10, 2012, along with a compliance schedule for arsenic. Because the Raritan River has been identified as impaired for arsenic and benzene, the discharge limits imposed for these two constituents must be equal to the New Jersey SWQS of 0.017 and 0.15 micrograms per liter, respectively. However, the NJ SWQS for arsenic and benzene is more stringent than the quantification limit. Therefore, the enforceable daily maximum concentration is 8 micrograms per liter for arsenic and 7 micrograms per liter for benzene. Operation of the interim treatment plant commenced in May 2012 with treated groundwater subsequently being discharged in compliance with the New Jersey Pollution Discharge Elimination System (NJPDES) permit equivalent to Cuckel's Brook. The permit equivalency for the interim treatment plant is not classified as a general permit equivalency, but, rather, is classified as individual because it establishes individual discharge effluent limits and monitoring requirements. This permit equivalency will be utilized for the duration of the Removal Action provided that no significant changes occur to the influent water characteristics or discharge flow rate. A new permit equivalency would be required when the interceptor trench and interim treatment plant are incorporated into the Site-wide remedy.

As indicated in the response to Comment 5.1 above, groundwater collected as part of the Site-wide remedy would be discharged to surface water following complete on-site treatment unless it is determined that another treatment option (re-injection into groundwater following complete on-site treatment or discharge to the local sewerage authority, directly or following pre-treatment) is more appropriate. An individual NJPDES discharge to surface water (DSW) permit equivalent would be required for the Site-wide remedy if any treatment option involving discharge to surface water is implemented.

5.4 Several commenters expressed concern over the remedy's compliance with the Clean Water Act ARARs, such as NJ SWQS and NJPDES permit requirements. A commenter stated that any discharge to the river must comply with NJ SWQS and NJPDES effluent limits at the point of discharge. The commenter stated that EPA has failed to demonstrate how all discharges will comply with the Clean Water Act in the form of EPA delegated NJ SWQS and NJPDES permit requirements, such as WQBEL's and industrial storm water requirements. The commenter stated that the NJPDES General Permit fails to include effluent limitations for all parameters discharged, as required by NJ SWQSs, NJPDES regulations and the Clean Water Act. The commenter also stated that this is a key Clean Water Act compliance issue because no permit may be issued that would violate a state ambient water quality standard. The commenter stated that it should be noted that any discharges to the river will comply with NJ SWQSs and NJPDES WQBELs at the point of discharge, with no mixing zone.

Response: As indicated in the Decision Summary of the ROD, the selected remedy will comply with all substantive federal and state requirements which are applicable or relevant and appropriate to its implementation. As indicated in the response to Comment 5.3 above, the permit equivalency for the interim treatment plant is not classified as a general permit equivalency, but, rather, is classified as individual because it establishes individual discharge effluent limits and monitoring requirements.

5.5 Several commenters expressed concern over the treatment of Site groundwater at the local sewerage authority. Specifically, commenters were concerned that the local sewerage authority's treatment process may not be capable of treating the range of contaminants found at the Site. Several commenters recommended that the effluent limits for Site-related contaminants, such as volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs), be imposed at the local sewerage authority's discharge for the extent that they are used for the treatment of the Site's stormwater and groundwater.

Response: Comment noted. The local sewerage authority has a specific operating permit issued by the NJDEP. This permit contains conditions (i.e., capacity constraints, treatment equipment requirements, etc.) and water quality standards or levels that must be met by the authority. Based upon a number of comments received indicating a preference for the complete on-site treatment of collected groundwater, EPA has decided to proceed with "discharge to surface water following complete on-site treatment" as the preferred treatment method. The selected remedy will comply with all substantive requirements of federal and state requirements which are applicable or relevant and appropriate to its implementation.

5.6 A commenter inquired about the status of the interim groundwater remediation facility.

Response: In May 2012, the construction of the interim groundwater treatment plant was completed under EPA's removal program. This groundwater removal system, which also includes a collection trench and containment wall, was designed to intercept and capture or otherwise prevent releases of groundwater originating from the Site into the Raritan River. The interim groundwater treatment plant is currently operated by Wyeth Holdings Corporation, a subsidiary of Pfizer, Inc, under a NJPDES DSW permit equivalency with discharge to Cuckel's Brook.

5.7 A commenter asked how EPA is proposing to monitor the discharge's impact on the receiving streams once the proper effluent limits are set.

Response: A permit equivalency was issued by NJDEP's Bureau of Surface Water Permitting for the interim treatment plant in May 2012. Operation of the interim treatment plant commenced in May 2012 with treated groundwater subsequently being discharged in compliance with the NJPDES permit equivalent to Cuckel's Brook. The NJDEP's Site Remediation Program is responsible for monitoring compliance with the conditions of this permit equivalency. The permit equivalency requires continuous monitoring for flow and either monthly or quarterly monitoring for toxic parameters. EPA's removal program is expected to independently sample and analyze the effluent for Site-related contaminants of concern prior to transferring those responsibilities over to EPA's remedial program for continued sampling and analysis oversight. In addition, a comprehensive Site-wide surface water and sediment monitoring program will also be utilized to monitor the potential impacts of the Site and other possible sources of impacts on the Raritan River and Cuckel's Brook.

5.8 A commenter asked if EPA has collected baseline water quality data in Cuckel's Brook and the Raritan River to have a means of comparison with water quality in the future. The commenter also indicated that he would like to be provided with these data if they exist.

Response: Surface water quality data have been collected in both the Raritan River and Cuckel's Brook as part of several sampling efforts dating back to the early 1980's. In 1982, NJDEP ordered American Cyanamid to develop and implement a surface water sampling program to quantify the levels of toxic chemicals in the Raritan River. This sampling program was completed in October 1983. Surface water quality data were collected in both Cuckel's Brook and the Raritan River in a 1994 Raritan River Assessment. Data were also collected as part of a surface water and sediment monitoring program from 2005 to 2009. Finally, surface water quality data have been collected as part of the EPA Removal Action. A summary of the historical surface water and sediment data were provided to the commenter via email on April 9, 2012.

5.9 A commenter asked if EPA will be monitoring the receiving streams to evaluate the benefit of removing the contaminated seeps, treating the contaminated groundwater and discharging it to Cuckel's Brook.

Response: In August 2012, an updated, more comprehensive Site-wide surface water and sediment monitoring program was approved by EPA and NJDEP. Under this plan, several additional surface water and sediment sampling locations (some located upstream and downstream of the Site) were added to the previous Site sampling plan. In addition, a number of Site-related contaminants of concern will be analyzed on a quarterly basis. Sampling will be conducted under this program to monitor the potential impacts of the Site and other possible sources of impacts on the Raritan River and Cuckel's Brook.

5.10 A commenter expressed concern over potential seepages or other flood-related distribution of contaminants from the Site into the Raritan River. The commenter stated that there must be a means of testing the efficacy of the slurry walls and reporting the results to the community on a quarterly basis, along with a description of the response actions to address the seeps. Because potential seepages directly affect the river, the commenter suggested that surface water quality monitoring data also be reported to the community on a quarterly basis, with an explanation for any levels that exceed NJ surface water quality standards.

Response: Regarding the commenter's concern over the flood-related distribution of contaminants, EPA believes that the selected remedy will perform as intended, even under significant flooding events. Please see the response to Comment 3.2 in the written comments section for a further discussion of the design of the capping systems.

Under the selected remedy, the existing bedrock groundwater collection system will be improved by relocating the primary extraction wells to a more central location and through the placement of additional extraction wells, as necessary, to ensure that all Site-related groundwater is captured. In addition, a recovery system (such as trenches, wells and/or containment walls) will be constructed for collection of overburden groundwater at several locations. The details of these improvements and the treatment of collected groundwater will be developed during the RD phase. Any containment walls constructed as part of this remedy will require ongoing maintenance and monitoring to ensure that they are functioning as intended. The details of the maintenance and monitoring requirements for any containment walls constructed on-site will be determined in the remedial design phase.

Regarding the commenter's request that EPA provide the community with an update on the status of the work to address the seeps, EPA began issuing detailed quarterly updates to the community via email in July 2012. The quarterly updates document the project status and focus on major tasks completed over the past quarter, as well as anticipated tasks for the upcoming quarter. The most recent quarterly update distributed in July 2012 included an update on the status of the EPA Removal Action to address groundwater discharges into the Raritan River.

5.11 A commenter, representing the local sewerage authority, stated that the sewerage authority has been collecting water quality data in Cuckel's Brook and the Raritan River for over two decades and has used these data to develop water quality models of the system. The commenter noted that a consultant to the sewerage authority performed a Total Maximum Daily Load study for the Raritan River Basin, but was not able to finalize the segment near the Site due to unexplained dissolved oxygen dynamics, which the commenter suggested may be caused by potential contamination from the Site. The commenter offered to share the sewerage authority's water quality data with EPA.

Response: EPA received a compilation of water quality data collected by the sewerage authority on April 24, 2012 via email. EPA provided these data to the Site owner electronically on May 1, 2012 and recommended that the Site owner review these additional data. These data were reviewed by the Site owner and considered when developing the updated surface water and sediment monitoring program.

5.12 A commenter, who resides in Franklin Township, expressed concern about the Site's effect on his neighborhood's well water supply. More specifically, the commenter expressed concern over whether the Site has contaminated private wells in his neighborhood through either bedrock migration or as a result of previous flooding events. He also asked if EPA could sample private wells in his neighborhood as part of the proposed cleanup.

Response: To address the commenter's concerns, EPA first reviewed all available Site-related information, which included groundwater sampling results in the surrounding area. EPA then consulted with NJDEP to obtain any information that it may have on file. Finally, EPA's team assigned to the Site, which includes a hydrogeologist, reviewed the approximate location of the commenter's neighborhood and how it may relate or connect to the American Cyanamid Superfund site.

In response to the commenter's concern over the effects of recent flooding on his neighborhood and the surrounding community, EPA reviewed the results of several rounds of surface water sampling conducted on the floodwaters from the most recent flooding events, i.e., Hurricane Irene and Tropical Storm Lee. The North Area of the Site where the majority of waste disposal activities occurred is surrounded by a flood protection berm. During the Hurricane Irene storm event, flood waters overtopped this berm and flooded the North Area of the Site. The flood protection berm prevented flood waters in this portion of the Site from receding and created a large area of standing water. Sampling results of this standing water confirmed that contaminant concentrations were below levels of concern which also provided an indication of the water quality conditions during and immediately after flooding. Using these data and applying them to nearby conditions, it is unlikely that Site contaminants affected any adjacent communities both during and after the flood event.

In response to the commenter's concern over whether the Site has contaminated private wells in his neighborhood through bedrock migration, EPA reviewed all available Site-related information and determined that the bedrock groundwater in this neighborhood, as well as the surrounding communities, flows naturally from east to west under uninfluenced conditions. Since the Site is located to the west-northwest of the commenter’s home, this flow is away from the commenter’s neighborhood and towards the facility.

Additionally, the Site itself has its own groundwater containment system which pumps a minimum of 650,000 gallons of groundwater from the bedrock area per day. This containment system was implemented to address the contaminated groundwater plume that exists in the bedrock under the Site. Routine semi-annual groundwater monitoring confirms that the majority of this contamination is captured by the Site’s containment system. Any contamination not captured by the current system has been shown to be localized and there are indications that it is migrating to the south, which would not affect the community’s wells. It should also be noted that most if not all of the private wells in this community are screened in the bedrock. Based on this information, the current understanding is that the groundwater that property owners from this community extract using their private wells would not be affected by the Site even if the Site’s own containment system were shut down.

Lastly, a separate evaluation was recently conducted to assess the potential for groundwater to flow south of the Raritan River into the communities of Franklin Township and South Bound Brook. Based upon both regional and local groundwater characteristics, this evaluation concluded that a complete pathway does not exist for the transport of Site-related contaminants beyond the Raritan River to the south. Therefore, there is no indication that Site-related contamination is impacting public water supply wells in both Franklin Township and South Bound Brook neighborhoods.

Based upon the discussion of findings in the preceding paragraphs, the sampling of private wells in this community is not warranted at this time.

5.13 A commenter noted that the cost analysis in the Site-wide FS includes the total annual O&M costs for the groundwater treatment systems and the multi-layer caps for a 30-year period, but does not incorporate any costs beyond this time period. The commenter stated that the costs should be adjusted to reflect the Site owner’s true obligation. The commenter stated that the cost estimates should incorporate the O&M costs beyond the 30-year period.

Response: When developing the cost estimates for an alternative, it is important to define a reasonable period of analysis, which in this case is 30 years. The project duration generally involves the planning, design and construction of the remedial alternative, continues through short- and long-term O&M and ends with project completion and closeout. For the purposes of understanding and comparing the alternatives outlined within the Site-wide FS, a 30-year period was used.

5.14 A commenter emphasized the importance of preventing the off-site migration of contaminants into the Raritan River.

Response: The groundwater component of the selected remedy will address potential contamination that is migrating from the Site to the Raritan River. Ongoing monitoring and maintenance of the Site will also be required following the remedy implementation to ensure long-term effectiveness.

Comments on In-situ Solidification/Stabilization (S/S)

6.1 A commenter asked whether the principle threat waste (PTW) is to be stabilized or solidified and noted that there is a big difference given the mobility of the PTW material. The commenter stated that the Proposed Plan should indicate which is being done and the technical details, such as percent cement and strength of solidified mass to be achieved. The commenter then stated that merely stabilizing the waste does not limit mobility.

Response: The term “solidification/stabilization” refers to a general category of processes that are used to treat a wide variety of wastes, including solids and liquids. EPA is aware that solidification and stabilization are each distinct technologies. Solidification refers to processes that encapsulate waste to form a solid material and restrict contaminant migration by decreasing the surface area exposed to leaching and/or by coating the waste with low-permeability materials. Solidification can be accomplished by a chemical reaction between a waste and binding (solidifying) reagents or by mechanical processes. Stabilization refers to processes that involve chemical reactions that reduce the leachability of a waste. Stabilization chemically immobilizes hazardous materials or reduces their solubility through a chemical reaction. The physical nature of the waste may or may not be changed by this stabilization.

A combination of both solidification and stabilization will be implemented as part of the selected remedy and treatability testing will be conducted in the RD phase to optimize the in-situ S/S mixture and determine the extent that each of these distinct technologies will be implemented. Materials that are treated with in-situ S/S will be required to meet performance measures for minimum unconfined compressive strength (UCS), maximum permeability and leachability testing for Site-related constituents.

6.2 A commenter asked how the in-situ S/S component of Alternative 4A reduces the toxicity of contaminants.

Response: Stabilization refers to techniques that chemically reduce the hazard potential of a waste by converting the contaminants into less soluble, mobile or toxic forms. Chemical reagents, such as thermoplastic polymers, thermosetting polymers and other proprietary additives, are often utilized with S/S to react with and chemically adsorb to contaminants to immobilize them. Many chemical reagents have also been found to transform successfully some toxic contaminants into less toxic or nontoxic forms. One example is lime, which is commonly used as an additive in S/S. Lime converts many metals to a more chemically stable form and neutralizes acidic materials, thereby reducing the toxicity of the waste. During the RD phase of the selected remedy, the use of chemical reagents will be evaluated and treatability studies (both in lab and pilot forms) will be conducted to confirm success.

6.3 Several commenters recommended that treatability testing (simulation, bench and/or field testing) be conducted during the RD phase to determine the most effective combination of amendments, stabilizing agents and geogrids to be utilized in the in-situ S/S process.

Response: Treatability testing for in-situ S/S will be conducted prior to full-scale implementation to optimize the in-situ S/S mixture and demonstrate a correlation between leachability, UCS and permeability performance criteria. Materials that are treated with in-situ S/S will be required to meet performance measures for minimum UCS, maximum permeability and leachability testing for Site-related constituents. Testing of the performance measures will be required periodically during the remedial action to maintain the integrity of the remedy. The frequency and nature of the performance measures testing will also be determined during RD. During implementation of the full-scale remedial action, performance measures would be used for the purposes of mix optimization, quality assurance and verification that the remedy is effective.

6.4 Several commenters recommended that comprehensive treatability studies for in-situ S/S be performed on the various wastes prior to the selection of a remedy. A commenter stated that a comprehensive study and bench-scale testing using the best available cleanup technologies should be performed to determine which technologies should be used for the various wastes. In addition, a commenter stated that the Proposed Plan pushes the testing of these materials off until the design phase, but there is no discussion of what will happen if S/S does not work.

Response: There have been several studies performed on the various contaminated materials on-site over the past 15 years. Of note, S/S technologies have been successfully implemented at the Site for several impoundments containing similar materials to those present in Impoundments 3, 4 and 5. In 2003, S/S was successfully implemented to remediate a portion of Impoundment 5, which was about 2.5 acres and contained tar-like materials similar to those of Impoundments 3 and 4, as well as the remaining materials in Impoundment 5. S/S was also utilized successfully to remediate Lagoon 6 under the Resource Conservation and Recovery Act (RCRA) in 1999.

Because S/S has been successfully implemented for several impoundments containing similar materials, it was concluded that additional treatability studies were not necessary prior to the selection of a remedy. Treatability testing for in-situ S/S will be conducted prior to full-scale implementation to optimize the in-situ S/S mixture and demonstrate a correlation between leachability, UCS and permeability performance criteria. For more information on the treatability studies for in-situ S/S, please see the response to Comment 6.3 above.

6.5 A commenter stated that S/S actively drives VOCs from the wastes due to physical mixing and heat generation and, therefore, S/S must be conducted under the same controls as excavation. The commenter stated that the selection of treatment only requires explanation as the benefits of leaving the wastes at the Site are questionable.

Response: Emissions during both in-situ S/S and some identified excavation locations are expected. Appropriate uses of water, foam or other types of available surfactants will be determined during the design phase. The need for any additional engineering controls will also be evaluated. Field investigations will also be utilized to identify and verify the potential air risks prior to the start of remedial activities.

6.6 A commenter stated that the justification for containing PTW at the Site instead of providing treatment or off-site removal is concerns over vapor emissions during excavation. The commenter noted that the proposed S/S will have vapor emissions that must be controlled. The commenter stated that no quantitative evaluation of the emissions from these options was provided in the Site-wide FS or the Proposed Plan. The commenter asked what amount of VOC releases are expected with Alternative 4A in comparison to other alternatives.

Response: When any type of excavation activity is being conducted at the Site, there is a concern with emissions whether it is dust or vapors. All alternatives have a degree of risk associated with excavation and the handling of the materials. This was weighed out in the comparison of the alternatives sections of both the ROD and Proposed Plan. The selected remedy was chosen due to a number of factors, including the concern of emissions being generated during remedial activities.

As stated in the Site-wide FS, the air emissions generated from Alternatives 7 and 11 would be higher than those from Alternative 4A. Because specific analytical data or treatability studies were not necessary to complete the alternative analysis and, therefore, have not been conducted to quantitatively estimate the emissions, a qualitative assessment was utilized in the Site-wide FS. This qualitative assessment for identifying emissions is called the emission “drop” factor method. This method is approved by NJDEP for use in developing air permits and consists of developing a unitless emission (drop) factor and applying it to the identified process steps. The standard drop factor is based on the lifting and dropping of a unit mass of material. Each process step is assigned a multiplication factor to represent better the extent of agitation and therefore higher emissions generated. For example, unloading a dump truck would use a multiplication factor of 1 because it is a single drop, whereas a pug mill would be assigned a multiplication factor of 50 based on the rigorous agitation. These factors have been corroborated based on field observations during previous full-scale operations at the Site. For a more detailed description of the development of air emissions based on the drop factor method, please reference the Impoundment Remedy Appropriateness Evaluation (O'Brien & Gere, February 2005). This report is available in the information repositories maintained at the EPA Region 2 office located at 290 Broadway, New York, New York, the NJDEP Office of Records at 401 East State Street, Trenton, New Jersey and the Bridgewater Township Library at 1 Vogt Drive, Bridgewater, New Jersey.

Cleanup Timeline & Pace

7.1 Several commenters, including elected officials and interest groups, expressed concern over the slow pace of the cleanup efforts. One commenter asked why EPA allowed the Site owner to stop the cleanup midstream after the ROD was signed and then let the Site languish for another eight years.

Response: As described in the "Site History and Enforcement Activities" section of this ROD, the Site was previously addressed under seven independent operable units (OUs) each on different time lines from one another. This approach did not achieve the desired cleanup results nor were the activities performed in an expeditious manner. Under this new approach of remediating the entire Site all at once, with the exception of Impoundments 1 and 2, EPA believes that the impoundments, Site-wide soils and groundwater can be addressed in a timely manner and will be protective of human health and the environment, will comply with ARARs, will be cost-effective and will utilize permanent solutions and alternative treatment technologies to the maximum extent practicable.

As discussed in the Proposed Plan and this ROD, in June 2004, all on-going remedial activities at the Site, with the exception of other ongoing investigation and remediation activities associated with Impoundments 14, 15, 16 and 20 and the bedrock groundwater capture system, were suspended pending the completion of a remedy review report to evaluate the appropriateness of the remaining impoundment remedial programs. Based upon this report, referred to as the 2005 Impoundment Remedy Appropriateness Evaluation, it was determined that the conditions for Impoundments 1, 2, 3, 4, 5, 13, 17 and 24 had changed, in some cases significantly, since their respective RODs were issued. Wyeth undertook completion of a Comprehensive Site-wide FS designed to address all remaining contamination within the various media on-site through a single comprehensive program under OU4.

EPA disagrees that the Site has languished over the past eight years. In support, a number of activities were completed from 2004 to 2012. In 2005, a Data Adequacy Review (DAR) was completed to assess the adequacy of existing soil and groundwater data assembled through previous investigatory and monitoring programs at the Site. A Baseline Ecological Risk Assessment (BERA) was completed in January 2005 and a Human Health Risk Assessment (HHRA) was completed in December 2006. A groundwater remedial investigation (RI) report was completed in February 2006 and a supplemental groundwater RI was completed in February 2008. Impoundments 14 and 20 were remediated under CERCLA per a 2007 Explanation of Significant Differences (ESD) and completed in August 2010. This example further illustrated the need for a reevaluation of all previously approved remedies to be completed on-site. In March 2010, EPA presented the proposed alternatives of the Comprehensive Site-wide FS to EPA’s National Remedy Review Board (NRRB) to evaluate the appropriate remedy for the remainder of the Site and ensure the selected remedy is consistent with national policy. The Comprehensive Site-wide FS was completed in February 2012 and the Proposed Plan was released for public comment on February 16, 2012.

7.2 Several commenters indicated that they were pleased to see the cleanup process beginning to accelerate and indicated that they would like to see recent momentum continue. One commenter expressed appreciation and support for the current Site owner’s efforts to remediate the Site. The commenter also expressed a desire for the cleanup efforts to proceed in a reasonable time frame in order to protect the community.

Response: Comment noted. EPA will continue to work to remediate the Site in a time-efficient manner, while taking the necessary precautions to ensure the protection of human health and the environment. The estimated implementation time frame of 10 years for the selected remedy is relatively short in comparison to the estimated implementation time frame of 20+ years for other alternatives.

7.3 A commenter questions the estimated implementation time frames for Alternatives 4A and 7. The commenter stated that it should not take 10 years to cap the Site and suggested that the implementation time frames for all of the alternatives are likely exaggerated.

Response: In addition to what was discussed in the response to Comment 4.8 and based upon a review of the estimates in the Site-wide FS, EPA does not believe that the implementation time frames are overestimated for any of the alternatives. If any inaccuracies do exist, the implementation time frames for some of the alternatives may be slightly underestimated. The pre-design testing required for S/S has the potential to affect the schedule for Alternatives 4A and 5. Because of the heterogeneity and nature of the contamination at the Site, extensive pre-design testing would be required for the treatment technologies employed with Alternatives 5, 7 and 11. The extensive pre-design testing required for these alternatives would have significant potential to result in delays in the schedule. For Alternative 7, it is estimated that an LTTD unit would be required to operate 24 hours per day, 365 days per year for at least 14 years in order to treat movement control areas, which comprise approximately 37 acres. Additional time would be required for the treatment of vapor control areas, which comprise about 34 acres. Based upon this information, the estimated implementation time frame for Alternative 7 is not overestimated and may, in fact, be underestimated.

To address the comment regarding capping, the caps identified in the selected remedy also require a detailed design to incorporate all Site-specific hazards that pose a threat to their integrity. There are three caps, which are identified in detail within the ROD, to be utilized over approximately 200 acres. In some areas, a vapor mitigation system will be required to capture and treat emissions. All engineered caps will be designed and constructed to withstand the effects of at least a 500-year flood event and to incorporate all Site-specific hazards that pose a threat to their integrity.

7.4 A commenter noted that Alternative 4A has a 10-year time line for completion and stated that a detailed schedule for this project and the justification for its length of time should be provided prior to the selection of a remedy.

Response: A detailed schedule for the selected remedy will be developed during the remedial design phase. Many of the complex technical details of the remedy will be developed during this phase of work. Any schedule developed prior to performing a detailed design would be highly inaccurate.

Post Remedy Maintenance, Future Use and Financial Assurance

8.1 Several commenters expressed concern over the long-term monitoring of the Site, particularly with the remedy's engineering controls. The commenters stated that the Site should be monitored in perpetuity or until the waste no longer poses a threat to human health and the environment. A commenter recommended that the Proposed Plan explicitly state that maintenance will be required in perpetuity so that all stakeholders understand that waste will remain on the Site. The commenter also recommended that it be explicitly stated that any alterations or modifications to the engineering controls will require approval from EPA.

Response: As part of the selected remedy, ongoing monitoring and maintenance of the Site, including engineering controls, will be required to ensure that the remedy is functioning as intended. The details of the maintenance and monitoring requirements for the engineering controls will be determined in the design phase. A statutory review will also be required to be conducted five years after initiation of the remedial action to ensure that the remedy is, or will be upon completion, protective of human health and the environment. The performance and the protectiveness of the remedy will continue to be monitored, and a formal report of this review will be documented every five years.

As discussed in the Decision Summary of the ROD, monitoring of the engineered capping systems, sediment, surface water and groundwater will be required as part of the on-going operation plan at the Site. The details of the inspection and maintenance program for the engineered capping systems will be developed in the remedial design phase.

8.2 Several commenters expressed an interest in the beneficial reuse of the Site. Some commenters mentioned more specific preferences for the reuse of the Site, such as the creation of a Raritan River greenway along the Raritan River, reuse consistent with the Bridgewater Cyanamid Oversight Committee “Return to Use” principles, reuse of portions of the Site for business or recreational purposes in the near future and the reuse of a portion of the Site adjacent to the Bridgewater train station.

Response: Since the future use of the Site is determined by the Site owner, EPA will communicate the commenter’s preferences for the reuse of the Site to the Site owner. The current Site owner has discussed a number of potential future uses for the Site ranging from light industrial use to recreational use. It should be emphasized that reuse of any portion of the property would not occur until either the remedy is complete in its entirety or it is determined that reuse would not interfere with the implementation of remediation activities. Please see the “Current and Potential Future Site and Resource Use” section of the Decision Summary of the ROD for a further discussion of the future use of the Site.

8.3 A commenter noted that American Cyanamid transferred a property along East Main Street in Bridgewater (Block 347, Lot 1.02) to Bridgewater Township and Somerset County in the mid-1990s. This transferred property, now owned by Somerset County, contains wetlands which remain a critical element in the planned future development of this land. The commenter indicated that the mitigation of the wetlands on Lot 1.02 during the remediation effort would represent an essential milestone in the County’s efforts to return this property to environmental acceptability and public use.

Response: As discussed in the response to Comment 8.2 above, the future use of the Site is determined by the Site owner; however, EPA will communicate the commenter’s desire for the mitigation of the wetlands on Block 347, Lot 1.02. The selected remedy would be consistent with the County’s efforts to return this property to environmental acceptability and public use.

8.4 A commenter stated that a deed notice for the property should be required to identify the wastes left behind and the restrictions of future use that will assure the engineering controls are maintained in perpetuity. The commenter believes that this should be explicitly stated so that current and future stakeholders understand the specific restrictions on the Site.

Response: As indicated in the Decision Summary of the ROD, the following institutional controls will be required: deed restrictions to maintain the protectiveness and functional integrity of engineered capping systems; restrictive covenants to prevent future land uses that interfere with the implementation or protectiveness of the selected remedy; and a groundwater classification exception area and well restriction area (CEA/WRA) to prohibit future use of the groundwater in this area and to restrict the installation of wells (other than for monitoring or remediation purposes) in the area for the duration of the CEA. The specific details of the institutional controls will be developed following the issuance of the ROD.

8.5 The Site owner noted that the vapor control areas outlined on Figure 8 of the Site-wide FS are preliminary and a more refined assessment method will be developed and implemented during the remedial design phase to delineate areas appropriately. The Site owner's understanding is that once these areas are defined, they will then be addressed with vapor controls which can consist of engineering controls, such as active or passive vapor mitigation systems, institutional controls or a combination, as appropriate. The Site owner recommended that the remedy description include a clarifying statement that the final definition of the limits of areas requiring vapor control will be determined through a more refined assessment implemented during the design phase.

Response: EPA agrees that the vapor control areas identified in the Site-wide FS are preliminary and a more refined assessment method will be developed and implemented during the RD phase. EPA disagrees that the vapor control areas could be addressed solely by institutional controls. As indicated in this ROD, an impermeable multi-layered engineered cap, which will include a vapor mitigation system, will be constructed over areas requiring vapor controls. Institutional controls would then be utilized to ensure the protectiveness of the remedy and its compatibility with future reuse.

8.6 Several commenters recommended that EPA require the Site owner to post a bond for financial assurance to ensure the continuous operation, monitoring and maintenance of the Site. One commenter asked what mechanism will be used by EPA to assure that the Site owner continues to fund the project.

Response: Pursuant to the Superfund law, any agreement between the Site owner and EPA requires the Site owner to obtain financial assurance for the work to be performed. The financial assurance can be in the form of an insurance policy, guarantee, surety bond, letter of credit or qualification as a self-insurer. The financial assurance presented by the Site owner must be acceptable to EPA in order to ensure that the work will be completed.

Community Impacts

9.1 Several commenters expressed support for the Site's current TAG recipient and issued support for the organization's recommendations on the Proposed Plan.

Response: Comment noted.

9.2 Several commenters expressed opposition to the role of the TAG recipient as an advocacy group that is responsible for the dissemination of information and cleanup options on the Site. The commenters stated that the technical assistance grant (TAG) recipient has spent over $235,000 of federal taxpayer money to have a technical advisor review documents and evaluate cleanup options. The commenters asked why the TAG recipient has not come up with a permanent solution with all of the taxpayer money spent. The commenters also questioned the technical competency of the TAG recipient's technical advisor.

Response: EPA Region 2 conducted a review of the TAG recipient in Spring 2012 to determine whether any TAG requirements had been violated per Title 40, part 30 of the CFR. This review concluded that the TAG recipient was in compliance with all TAG requirements per 40 CFR, part 30. In addition, EPA has conducted several random audits of the TAG recipient since the TAG was issued, including one in

October 2012, and they have been found to be in compliance with all TAG requirements for all audits.

9.3 An elected official asked that EPA consider the health and welfare of the surrounding community during the cleanup efforts.

Response: The mission of EPA is to protect both human health and the environment. The safety of Site workers and the surrounding community will be of the utmost concern to EPA throughout the implementation of the remedy. Routine air, groundwater, surface water and sediment monitoring will be conducted throughout the implementation of the remedy to ensure that Site workers and the community are not exposed to unacceptable risks.

9.4 A commenter stated that it is essential that the vapors from all areas be measured and reported to anyone interested on a regular basis. The commenter also recommended that the remediating party secure the contact information (email or other) for all interested parties, and that EPA provide quarterly reports on the progress of remediation efforts. The commenter requested that all of the updates provided to community be in “plain language” without undue ambiguity and with opportunities for further information clearly available.

Response: As an important part of EPA’s oversight, air emissions will be monitored throughout the implementation of the selected remedy to ensure that the surrounding community and Site workers are not exposed to unacceptable risks. The Site will have several sampling points on the property boundaries as well as more intensive points near the areas within the Site under construction. The appropriate response measures will be developed during the RD phase, including community and regulatory notifications that may be necessary.

Regarding the request for reporting on a regular basis, EPA began issuing detailed quarterly updates via email to the community in July 2012. In a clear and concise manner, the quarterly updates document the project status and focus on major tasks completed over the past quarter, as well as anticipated tasks for the upcoming quarter. The commenter’s email address has been added to the distribution list for the quarterly updates.

9.5 A commenter urged EPA to be transparent and communicate with the community in a timely matter throughout the remediation process. The commenter asked that EPA appoint a community liaison to interface with and be available to the community throughout the duration of remedial activities. The commenter asked that this liaison provide the community with periodic updates on all remedial activities and advance notice of all scheduled activities pertaining to the remediation. The commenter asked that the liaison also provide advance notice of activities that may adversely affect the health, welfare and property of the citizenry, as well as adverse impacts on business operations or community activities. The commenter stated that this person should have the primary responsibility to work with the community, business operators and governmental representatives to mitigate or eliminate any potential adverse impacts of the remedial activities.

Response: EPA has assigned a Community Involvement Coordinator, whose primary responsibility is to involve and inform the public about the Superfund process and the response actions conducted at the Site. The current Community Involvement Coordinator for the Site is Melissa Dimas, who can be contacted via phone at 212-637-3677 or via email at dimas.melissa@epa.gov. Any questions, comments or concerns related to the Site may be directed to the EPA Community Involvement Coordinator. EPA also maintains a Community Involvement Hotline for the general public to call regarding issues and concerns regarding the Site. The toll-free hotline is 1-800-346-5009.

As mentioned in the response to Comment 9.4 above, EPA began issuing detailed quarterly updates via email to the community in July 2012. The quarterly updates document the project status and focus on major tasks completed over the past quarter, as well as anticipated tasks for the upcoming quarter. The commenter’s email address has been added to the distribution list for the quarterly updates.

9.6 A commenter requested that the community be compensated for the loss of resources over the years that the Site has not been remediated. The commenter then acknowledged that her request was addressed in the Executive Summary of the Site-wide FS, which states the “remedial program will also be designed to allow for concurrent planning and implementation of prospective Natural Resource Damage restoration measures.”

Response: Comment noted.

9.7 The commenter recommended that two neighboring businesses, the local sewerage authority and the local water utility, be protected from contamination found on the Site.

Response: The impact to the surrounding commercial and residential areas has been and will continue to be given serious consideration throughout the implementation of the selected remedy. To ensure that the surrounding community members are not exposed to unacceptable risks, air emissions will be monitored throughout the implementation of the selected remedy. A 2008 assessment concluded that there is no risk of vapor intrusion via the groundwater pathway for residential and commercial areas nearby the Site. The surrounding commercial properties are currently serviced by a public water supply that is not connected with the contaminated groundwater beneath the Site; therefore, employees of these businesses are not exposed to the contaminated groundwater beneath the Site. In addition, the groundwater component of the selected remedy will address any potential contamination that may be migrating from the Site to the Raritan River.

9.8 The Site owner stated that the use of both freight trains and trucks will be evaluated for the transportation of materials during the design phase. The Site owner also noted that the potential impacts to the community will be considered in the evaluation process and mentioned that rail transportation has been successfully used in past remediation activities at the Site.

Response: Comment noted. EPA agrees with this approach.

9.9 Several commenters recommended that EPA consider utilizing the active rail line on the Site for the transportation of materials to and from the Site. One commenter noted that the Proposed Plan calls for the importation of approximately 960,000 tons of fill materials, which represents about 48,000 truckloads into the Site, or 96,000 truck movements.

Response: EPA acknowledges that increases in truck traffic through the local community will occur during the implementation of the selected remedy. In fact, increases in truck traffic through the community would be experienced to some degree for all of the alternatives, with the exception of Alternative 1. However, EPA will evaluate all transportation options, including the use of rail and trucks, during the RD phase to minimize the impact on the surrounding community. Under the selected remedy, if transportation via trucks is selected, it is anticipated that trucks would carry only S/S admixtures, clean fill and construction materials, as opposed to the transportation of highly contaminated material under other alternatives that called for off-site disposal or treatment.

Principal Threat Waste (PTW)

10.1 A commenter stated that all PTW should be consolidated in Impoundments 3, 4 and 5 for treatment with in-situ S/S.

Response: As noted in the Decision Summary of the ROD, the selected remedy will in fact address all PTW found on-site (with the exception of Impoundments 1 and 2) by consolidating them into Impoundments 3, 4 and 5 and treating these materials via in-situ S/S followed by capping.

10.2 A commenter asked how the characteristics of the Site’s wastes could be unknown at this juncture in the project and states that areas containing PTW should be known. The commenter asked how a remedy can be selected when the waste types are not ascertained.

Response: In the Proposed Plan and Site-wide FS, the impacted media was delineated at the Site based upon several previous RIs. EPA has recognized that conditions at the Site may have changed in some locations since sampling was conducted as part of these historical investigations; therefore, the selected remedy requires the completion of a pre-design investigation to confirm the identified areas and further delineate areas containing PTW.

Based upon the nature and extent of contamination identified by the historical investigation, the process of selecting a remedy was completed. As previously noted in the response to Comment 2.1, the selected remedy will be protective of human health and the environment, will comply with ARARs, will be cost-effective and will utilize permanent solutions and alternative treatment technologies to the maximum extent practicable.

10.3 A commenter stated that principle threat waste is typically removed or treated. The commenter noted that about 145,000 cubic yards of PTW are to be consolidated under the selected remedy. The commenter estimated that it would be about $50 million to remove and treat/dispose these materials off-site, which would be about a 25% increase in the capital cost for the remedy. The commenter noted that PTW has been removed from several other Superfund sites throughout Region 2, such as Cornell-Dubilier, Chemical Insecticide, Horseshoe Road, Ventron/Velsicol, White Chemical and Bayonne Barrel and Drum, and recommended that EPA take the same approach with the American Cyanamid site.

Response: The excavation and off-site treatment or disposal of this material was considered but not selected by EPA for a number of reasons stated in both the Proposed Plan and the ROD. The intrusive excavation activities that would be required for off-site disposal/treatment could last for over 20 years, which is more than double the implementation time frame of the selected remedy. Because of the intrusive excavation activities required for removal of the PTW, there would be significant challenges in controlling air emissions within acceptable levels. A remedy involving off-site disposal would require the transportation of highly contaminated material through the community. EPA estimates that the volume of PTW to be treated via in-situ S/S under the selected remedy is approximately 230,000 cubic yards. The estimated cost for excavation and off-site disposal of this volume of material would exceed $150 million using unit costs similar to those of the excavation and off-site disposal component utilized in Alternative 11. This would result in about a 75 percent increase to the cost of the selected remedy, not the 25 percent as suggested.

EPA believes that the selected remedy will meet the remedial action objectives (RAOs) created to address the human health risks and environmental concerns at the Site. The RAOs for PTW are to remove or treat material that meets the definition of PTW, to the extent practical, and prevent current or potential future migration of material that meets the definition of PTW from the Site that would result in direct contact or inhalation exposure, to the extent practicable. The selected remedy calls for the treatment of PTW via in-situ S/S, followed by containment using an engineered capping system. Under the selected remedy, the RAOs will be met by treating materials that meet the definition of PTW to prevent the migration this material from the Site. While PTW has been removed from other Superfund sites in Region 2, EPA believes that the selected remedy will effectively meet the RAOs and minimize the impact to workers and the surrounding community.

National Remedy Review Board (NRRB or Board)

11.1 A commenter asked that the NRRB's role be clarified so that the public may better understand the scientific and regulatory basis for EPA's Proposed Plan. Specifically, the commenter asked that EPA outline the membership, transparency, accountability, policies and decision-making procedures of the NRRB.

Response: EPA created the NRRB in January 1996 as part of a comprehensive package of reforms designed to make the Superfund program faster, fairer and more efficient. The NRRB is a peer review group comprised of managers and senior technical or policy experts from EPA offices across the nation that understand both the EPA regional and headquarters perspectives in the remedy selection process. The Board reviews proposed Superfund cleanup decisions that meet cost-based review criteria to assure they are consistent with Superfund law, regulations and guidance. Please see the following link for more information on EPA's NRRB: http://www.epa.gov/superfund/programs/nrrb/index.htm

11.2 A commenter asked how NRRB reviews are triggered.

Response: The NRRB typically reviews proposed interim and final Superfund response decisions at NPL sites for which the estimated remedial action costs exceed $25 million. On March 16, 2010, EPA presented the proposed alternatives of the Comprehensive Site-wide FS to the Board to evaluate the appropriate remedy. For more information on the NRRB review criteria, please visit the following link: http://www.epa.gov/superfund/programs/nrrb/reviewcr.htm

11.3 A commenter asked how NRRB members are selected.

Response: NRRB members are appointed by senior management officials of the offices they represent. The members are selected based on their extensive experience and are considered national experts in their respective fields. The Board includes one representative from each the ten EPA regional offices. The regional representatives are typically senior-level technical staff/managers with significant remedy selection expertise. In addition, there are about ten or more policy and technical experts from various EPA program offices nation-wide which also are selected based on their significant remedy selection experience.

11.4 A commenter asked about the qualifications and affiliations of the NRRB members.

Response: The NRRB is a technical and policy review group made up of members that have significant experience with both regional and Headquarters perspectives in the Superfund remedy selection process. Its members include senior managers and technical experts from each EPA region, as well as senior technical and policy experts from other EPA national offices. These include the Office of Superfund Remediation and Technology Innovation, Office of Research and Development, Office of Radiation and Indoor Air, Federal Facilities Restoration and Reuse Office, Office of Site Remediation Enforcement and the Office of General Counsel. The Board is chaired by the Office of Superfund Remediation and Technology Innovation. The following link contains a list of the NRRB members:
http://www.epa.gov/superfund/programs/nrrb/members.htm

11.5 A commenter asked what ethical standards govern the NRRB.

Response: The Board is charged with carrying out its duties with the highest degree of ethical standards. If, for example, a member has an actual or even perceived conflict of interest in connection with a site coming to the Board, he/she would not participate in that review.

11.6 A commenter asked how NRRB recommendations are developed.

Response: The NRRB reviews proposed Superfund cleanup decisions that meet cost-based review criteria to assure they are consistent with Superfund law, regulations, guidance and national policy. Board members develop their recommendations based upon their experience and expertise involving Superfund cleanup decisions.

11.7 A commenter asked how the NRRB deliberates.

Response: The NRRB generally meets quarterly to review proposed decisions that meet its cost-based review criteria. The product of the review is a memorandum sent from the NRRB to the regional Superfund Division Director that documents the Board's recommendations about the proposed cleanup strategy for a particular site. The NRRB review process allows full input from EPA regional site managers and other site team members as deemed appropriate by the region whose site is under review.

11.8 A commenter asked if the NRRB conducts peer review.

Response: Yes, as previously mentioned, the NRRB is a peer review group that reviews proposed Superfund cleanup decisions that meet cost-based review criteria to assure they are consistent with Superfund law, regulations and guidance.

11.9 A commenter asked if the NRRB is subject to the Federal Advisory Committee Act.

Response: The NRRB is an internal advisory group and not subject to the Federal Advisory Committee Act.

11.10 A commenter asked how the NRRB could first engage on March 16, 2010 and develop the selected alternative proposed on February 2012, after EPA and NJDEP have been involved at the Site for almost 30 years.

Response: EPA Region 2 presented the proposed remedial alternatives from the Site-wide FS to the NRRB in March 2010. At this presentation, EPA Region 2 recommended Alternative 4 as the preferred remedial alternative. The NRRB completed its review of the remedy in April 2010 and provided Region 2 with several recommendations. As a result, an additional alternative, Alternative 4A, was developed in response to the Board's advisory recommendations. The remedy selected in the ROD reflects this new alternative with NRRB's input. The NRRB Information Package developed for the Site, the Board's recommendations letter and the Region's response are all included in the Administrative Record for the Site.

11.11 A commenter asked if the NRRB recommendations are subject to the same scientific and regulatory standards of EPA Region 2.

Response: The NRRB reviews the proposed response decisions of response actions that meet the cost-based review criteria. The NRRB provides recommendations to the individual EPA regions; however, these recommendations do not change the agency's delegations or alter in any way the public's role in site decisions. Ultimately, the EPA regions have the final decision-making authority. The remedies proposed by any EPA region are still required to comply with, or waive, the substantive requirements of ARARs.

11.12 A commenter asked what explains the NRRB's deviation from EPA Region 2.

Response: As discussed above, the NRRB is a technical and policy review group comprised of senior managers and technical experts from each EPA region, as well as senior technical and policy experts from other EPA national offices. The NRRB provides its recommendations to the individual EPA Regions; however, these recommendations do not change the agency's delegations or alter in any way the public's role in site decisions. Ultimately, the EPA regions have the final decision-making authority. Please see the following link, which is a memorandum regarding the formation of the NRRB: http://www.epa.gov/superfund/programs/nrrb/11-28-95.htm.

<u>South and West Area Impoundments & Ecological Risk Assessments</u>

12.1 The Site owner commented that Alternative 4A will minimize disruption to existing wetlands and that the targeted remedy for Impoundments 13, 17 and 24 located within the flood fringe and outside the Main Plant area will be based upon the results of an ecological risk assessment. The Site owner discussed why this is the most appropriate approach for these impoundments.

Response: Comment noted. EPA agrees that this is the best approach for Impoundments 13, 17 and 24.

12.2 A commenter stated that materials in the Flood Plain area requiring direct contact, vapor or movement control should be relocated to the Main Plant area and covered by the appropriate engineered multi-layered cap.

Response: As indicated in the Decision Summary of the ROD, the impoundments in the South and West Areas will undergo an ecological risk assessment. Based upon the results of this assessment, the South and West Area impoundments will either remain as is if it is demonstrated that there is no unacceptable risk or be excavated and consolidated in the North Area in areas where the same types of controls are warranted.

12.3 A commenter stated that the scope of the ecological screening and assessment was too narrow spatially, ecologically and in terms of all discharges. The commenter also stated that the 1992 BEA and the 2005 BERA were limited to on-site habitat and did not consider all ecological values and functions. The scope of the assessment was not Site-wide and did not consider off-site impacts to sediments and biota, including downstream and estuarine impacts.

Response: The ecological risk assessments included sampling in the Raritan River as well as on-site habitats. As discussed in the response to Comment 5.9 in the written comments section, additional off-site sampling in the Raritan River is planned as part of ongoing efforts.

12.4 A commenter stated that the Raritan River is impacted by surface discharges, in addition to groundwater discharges from the Site. The commenter stated that the ecological assessments did not evaluate surface discharges, such as stormwater runoff, point source discharges, failure of impoundments/seepage/breakout and other impacts associated with flood events.

Response: The media sampled from the Raritan River are expected to serve as reservoirs of contamination derived from a variety of sources including those identified in the comment above. As discussed in the response to Comment 5.9 in the written comments section, additional evaluation of Raritan River media is planned as part of ongoing efforts at the Site.

<u>Hill Property</u>

13.1 A commenter noted that the TD Bank Ballpark was formerly considered part of the Site and asked what remediation activities were conducted on the Hill Property.

Response: The TD Bank Ballpark is part of the former Hill Property, which was addressed under OU6. The Hill Property was separated from the former Main Plant area of the Site and consisted of administrative buildings and a research laboratory. Historical records, aerial photographs and sampling efforts have all indicated that no waste disposal activities were ever conducted on any portion of the Hill Property. In 1996, NJDEP, with EPA concurrence, issued a no further action ROD with groundwater monitoring and institutional controls. In 1998, EPA deleted 140 acres of the Site from the Superfund National Priorities List and the property has since been redeveloped for commercial use.

13.2 A commenter asked what tests have been conducted to ensure the safety of workers on the former Hill Property.

Response: A quantitative analysis of the risks associated with the Hill Property soils was conducted in the 1992 Baseline Endangerment Assessment (BEA) to evaluate risks associated with exposure through incidental ingestion, dermal contact and inhalation as a result of intermittent maintenance employees performing work activities. This assessment concluded that the risks associated with baseline and future land use conditions at the Hill Property are below levels for concern for carcinogenic and noncarcinogenic health effects. Soil sampling was also conducted on the Hill Property as part of the 1996 OU6 ROD. The results of this sampling effort indicated that no soil contamination was present above NJDEP soil cleanup criteria (both residential and nonresidential) or background levels at the Hill Property.

Previous air monitoring conducted at the Site indicated that contaminants above levels for concern are not migrating off-site. During the implementation of the selected remedy, air emissions will be monitored to ensure the public’s safety.

All of the businesses located on the former Hill Property are currently serviced by a public water supply that is not connected with the contaminated groundwater beneath the Site. A 2008 assessment concluded that there is no risk of vapor intrusion via the groundwater pathway for residential and commercial areas north of the Site.

13.3 A commenter stated that flooding occurs frequently in this area and asked if soil and water had been tested since the Hurricane Irene flooding to ensure that contamination did not migrate off-site to nearby areas.

Response: During the Hurricane Irene storm event, flood waters overtopped the flood control berm surrounding the North Area and flooded the Hill Property. The flood protection berm prevents flood waters in this portion of the Site from receding and created a 'bathtub' of standing water. Several rounds of sampling were performed on this standing water to ensure that it did not impact the water quality of Cuckel's Brook and the Raritan River. After the sampling results confirmed that contaminant concentrations were below levels of concern, the standing water was released under controlled conditions so that local communities downstream were not affected. This standing water was released to Cuckel's Brook several weeks after the Hurricane Irene storm event in a manner that did not cause flooding in downstream communities. The sampling conducted on this standing water within the bermed area provides an indication of the water quality conditions during and immediately after flooding. Based upon the results of this sampling, it is unlikely that Site contaminants affected any nearby communities both during and after the flood event.

The flood waters associated with Hurricane Irene resulted in the accumulation of sediments in three areas outside the American Cyanamid site (Blue Lot parking area; New Jersey Transit Railroad Platform and pedestrian entrance, and; Railroad Underpass to the Blue Lot and main entrance to the Former Plant Area). These sediment accumulations were found to have elevated levels of metals (arsenic, lead) and it is unclear whether the source of these elevated concentrations is related to the Site. Regardless, after flood waters receded, the Site owner restricted access to these areas until the sediments were removed and disposed of off-site.

All of the businesses located on the former Hill Property are currently serviced by a public water supply that is not connected with the contaminated groundwater beneath the Site.

13.4 A commenter asked if the air inside the TD Bank Ballpark offices and the Somerset Medical Center Sports Performance and Rehabilitation Center had been tested for vapor intrusion.

Response: A preliminary assessment (Vapor Intrusion Assessment Work Plan, October 2008) was conducted to evaluate the potential for a vapor intrusion pathway. The first stage of this assessment determined that overburden groundwater (known as shallow groundwater) is the only vapor source with the potential for a complete pathway to off-site potential receptors. The second stage determined that a rapid action was not warranted based upon Site conditions. The third stage of the assessment compared existing overburden groundwater data to general vapor intrusion screening levels. Concentrations exceeding these screening levels were not identified in any areas of potential receptors. Particularly, four off-site monitoring wells to the north of the Site were sampled for VOCs and SVOCs. Several rounds of sampling were conducted on these monitoring wells from 2005 to 2008. The closest of these monitoring wells, Monitoring Well-15, is located approx 400 feet from the TD Bank Stadium. Two of these monitoring wells are located to the west of the stadium and one is located southeast of the stadium on the STS property. Groundwater concentrations at all of these monitoring wells were below the screening levels. Therefore, the assessment determined that there is no risk of vapor intrusion via the groundwater pathway for residential and commercial areas north of the Site.

In 2011, another assessment was completed which included the installation and sampling of three additional monitoring wells. Two of these additional monitoring wells were installed along the northern property line and sampling also indicated that concentrations were less than the screening levels.

13.5 A commenter asked if frequent hand-washing and/or showering at the TD Bank Ballpark posed any risk to human health.

Response: The TD Bank Ballpark is currently serviced by a public water supply that is not connected with the contaminated groundwater beneath the Site. New Jersey American Water, the local public water utility, is required to comply with federal drinking water regulations established by the EPA. The water supplied by NJ American Water is treated to ensure that it complies with state and federal standards before distribution to local homes and businesses. The drinking water supplied by NJ American Water is monitored regularly for a number of drinking water contaminants including Site constituents. The following link provides more information on the contaminants that suppliers of drinking water, such as NJ American Water, are required to sample for and meet federal maximum contaminant levels: http://water.epa.gov/drink/contaminants/index.cfm.

NJ American Water is also required to mail water quality reports to their customers annually. These annual reports can also be found on their website using the following link: http://amwater.com/ensuring-water-quality/water-quality-reports.html.

13.6 A commenter asked if there are any long-term exposure concerns for employees of the TD Bank Ballpark.

Response: The highest potential carcinogenic risk calculated in the 1992 BEA was 1.0×10^{-6}, and the highest potential Hazard index calculated was 0.0002, which were associated with the future use scenario of an individual ingesting Site soils. Based upon the results of the BEA and the vapor intrusion assessments, the human health risks at the Hill Property are below levels of concern for Site-related carcinogenic and noncarcinogenic health effects.

13.7 A commenter stated that the Hill Property is zoned for commercial use; however, the commenter asked if this property could potentially be zoned as residential given the current levels of soil contamination on this property.

Response: Current Bridgewater Township zoning maps indicate that the Hill Property is zoned as "Planned Retail Commercial and Public Development." The Hill Property was historically zoned for commercial/industrial use, as it was formerly used by the American Cyanamid Company for administrative buildings and a research laboratory. Historical records, aerial photographs and sampling efforts have all indicated that no waste disposal activities were ever conducted on any portion the Hill Property. It is stated in Section 6 of the 1996 OU6 ROD that "there is no soil contamination above the NJDEP cleanup criteria (both residential and nonresidential) or background... at the Hill Property." Based upon this statement, the Hill Property could potentially be zoned for residential use given the results of historical soil sampling. The concentrations of detected contaminants are compared to NJDEP soil cleanup criteria in Table 1 of the OU6 ROD.

Office of the Inspector General Report

14.1 Several commenters referenced a 2008 Office of the Inspector General (OIG) Report, which evaluates EPA's management of the backlog of Superfund sites. The objective of this report was to determine why some Superfund sites, listed on the NPL prior to October 1986, have not reached construction completion or achieved key environmental indicators. Several commenters noted that the 2008 OIG Report concluded that NJDEP and EPA caused unnecessary delays in cleaning up sites and concluded that timely and protective actions were not taken. A commenter stated that the Report's findings are relevant and should be discussed and applied to the proposed cleanup plan. The commenter stated that it is impossible to determine if the OIG findings have been addressed if the Proposed Plan does not mention this Report.

Response: As indicated in Region 2's response to the 2008 Report, there are a number of reasons for the delayed cleanup pace at the Site. The primary issues are the volume, location and complexity of waste materials at the Site. The Site is approximately 435 acres and contained 27 impoundments at the time of its listing on the NPL. Approximately 1.13 million cubic yards of impoundment material have been addressed to date and approximately 426,750 cubic yards of impoundment material still require remediation; therefore, about 73 percent of impoundment material at the Site has been addressed to date. It is estimated that the volume of contaminated soils on-site is approximately 3.34 million cubic yards. The quantity and complexity of the contamination at the Site are the primary reasons for the delays encountered. For a more detailed discussion of the slow pace of cleanup efforts at the Site, please see the Region 2 and NJDEP responses, which can be found in Appendices B and C of the 2008 OIG Report, respectively.

Impoundments 1 & 2

15.1 A commenter agreed that Impoundments 1 and 2 should be addressed in a separate FS.

Response: As indicated in the Proposed Plan and this ROD, EPA and NJDEP agreed to separate Impoundments 1 and 2 from the Site-wide FS and Site-wide remedy decision in 2009. The waste in these two impoundments has different characteristics than much of the waste materials on the Site. It is more highly concentrated and complex. In addition, the two impoundments are located immediately adjacent to the Raritan River. As a result, they are the subject of a separate Focused Feasibility Study (FFS) which is currently underway; a remedy specific to the two impoundments will follow.

15.2 Several commenters recommended that Impoundments 1 and 2 be fully remediated immediately.

Response: As indicated in the response to Comment 15.1 above, Impoundments 1 and 2 are being addressed in a separate FFS due to the highly concentrated and complex nature of their waste contents as well as their close proximity to the Raritan River. Because they are different, further study is necessary to determine the most effective and safe method to address the waste materials in the two impoundments. Meantime, a number of interim measures have been taken to reduce the threats to human health and the environment associated with these impoundments until a long-term solution can be developed. The measures include a series of berm improvements, the placement of a water cap over each impoundment, as well as the installation of a synthetic cover over the two impoundments. The Site owner will be required to conduct routine and regular inspections of these protective measures.

Minor Proposed Plan Revisions

16.1 The Site owner noted that the groundwater component of the proposed remedy includes groundwater collection and treatment. As stated in the Proposed Plan, "Conceptual improvements to the bedrock collection system include placing of the primary extraction well(s) in a more central location of the impacted bedrock and placing targeted bedrock extraction wells to address localized impacts such as in the vicinity of Lagoons 6 and 7/Impoundment 24." The Site owner recommended that the Proposed Plan be revised to clarify that the proposed remedy will address the bedrock groundwater from the Impoundments 1 and 2 area, other groundwater impacts located in the eastern part of the Site, as well as any other groundwater impacts that would be identified during the pre-design investigation preceding the RD. This approach is consistent with the installation of "targeted bedrock extraction wells to address localized impacts." As for the entire groundwater control system "additional details of these improvements would be developed during remedial design."

Response: Comment noted. The remedy will address the bedrock and overburden groundwater over the entire Site as well as from the South Area where Impoundments 1 and 2 are located. The Decision Summary of the ROD discusses the scope of the groundwater remedy.

16.2 The Site owner referenced page 16 of the Proposed Plan, where the remedy for Flood Plain soils (now referred to as South and West Area soils) and the Drying Bed Area for Alternative 4A are discussed. The Proposed Plan states, "These areas identified in the FSR requiring direct contact, movement and vapor control would be excavated and consolidated at the Main Plant in areas where the same types of controls are warranted." The commenter recommended that this sentence be revised to: "These areas identified in the Site-wide FS requiring direct contact, movement and vapor control (i.e., the area south of Impoundment 13 and the former Drying Bed Area depicted on Figure 4 of the Proposed Plan) would be excavated and consolidated at the Main Plant in areas where the same types of controls are warranted."

Response: EPA agrees with this comment. For clarification purposes, this sentence has been revised in the Decision Summary of the ROD.

16.3 The remedial action description for Impoundments 13, 17 and 24 under Alternative 4A on page 16 of the Proposed Plan, states "an ecological risk assessment would be conducted during the RD phase to identify if any material requires relocation and consolidation in the Main Plant in areas requiring direct contact control." For clarification purposes, the Site owner recommended that the Proposed Plan should reflect that the materials in these three impoundments are the only materials at the Site requiring additional ecological risk assessment.

Response: Comment noted. The ROD has been revised to provide a more detailed explanation of how the impoundments in the South and West Areas will be addressed. An ecological risk assessment will be conducted for Impoundments 13, 17 and 24 to confirm the appropriate treatment for these materials. If the ecological risk assessment identifies that any impoundment contents present an unacceptable risk, these materials would be relocated and consolidated in the North Area in areas where the same types of controls are warranted. Any impoundment contents that do not present an unacceptable risk could remain in their current location.

16.4 The Site owner identified an error in the “Corrective Action on Groundwater Discharges” section. The statement that “after sampling was performed and laboratory analysis was completed in December 2010” is incorrect. The sampling was performed in December 2010, but the laboratory data were not available to Wyeth Holdings Corporation until January 6, 2011, the same day that the data were reported to EPA and NJDEP. The Site owner recommended that this statement be revised to read: “after sampling was performed and preliminary laboratory analytical results were reported on January 6, 2011.”

Response: Comment noted. This error has been corrected and reflected in the ROD.

16.5 In the “Previously Remediated Impoundments” section on page 5 of the Proposed Plan, there is a reference to 50,000 cubic yards of highly mobile material from Impoundments 1, 2, 4 and 5 being treated on-site through recycling as a fuel source. The Site owner clarified that all of this light oil material was treated off-site for energy recovery, not on-site.

Response: Comment noted. This sentence has been revised in the Decision Summary of the ROD.

16.6 On page 7 of the Proposed Plan under the heading “Investigation Summary,” the first sentence of the first paragraph indicates that all remedial activities were suspended in 2004, however, this is not completely accurate. It was suggested that this sentence be modified to read: “Remedial activities were suspended in 2004 pending the completion of a Site-wide Feasibility Study (FS), with the exception of other ongoing investigation and remediation activities associated with Impoundments 14, 15, 16 and 20 and continued bedrock groundwater extraction and treatment.”

Response: Comment noted. This sentence was revised in the Decision Summary of the ROD.

16.7 On page 9 of 21 under the heading “Scope and Role of Action,” the Site owner recommended that the fourth bullet be deleted referencing Impoundments 1 and 2 since the eighth bullet calls out a new operable unit, OU8, which is specifically for Impoundments 1 and 2. Also, the fourth paragraph of this section indicates that all ongoing remedial activities were suspended when, in fact, remediation of Impoundments 14, 15, 16 and 20 and groundwater extraction/treatment continued.

Response: The Site-wide ROD indicates that Impoundments 1 and 2 are being addressed under the recently created OU8. The fourth paragraph of this section in the Site-wide ROD has been revised to clarify that remediation continued for Impoundments 14, 15, 16 and 20, as well as the bedrock groundwater extraction system.

16.8 On page 16, the Site owner recommended that the first sentence be revised as follows: “This alternative would provide a combination of caps over impacted areas in the Main Plant to control the potential for direct contact with impacted soils/impoundment contents, which is one of the primary RAOs for the Site, with the addition of excavation and consolidation in the Main Plant for areas in Impoundments 13, 17 and 24 as determined by an ecological risk assessment.”

Response: The Decision Summary of the ROD accurately states that Impoundments 13, 17 and 24 would be excavated and consolidated into the North Area (former Main Plant area) if determined to be necessary by an ecological risk assessment.

16.9 On page 20, in the second paragraph of the “Implementability” section, it is stated that “...however, Alternative 4A provides more protection through relocation of the Impoundment material in the flood plain to the Main Plant.” The site owner recommended that this statement be revised to read: “...however, Alternative 4A provides more protection through relocation of the Impoundment material in the flood plain to the Main Plant if required by results of an ecological risk assessment.”

Response: Comment noted. Impoundments 13, 17 and 24 would be excavated and consolidated into the Main Plant area (now referred to as the North Area) if determined to be necessary by an ecological risk assessment. The Decision Summary of the ROD specifically states this approach.

16.10 The Site owner noted that the second paragraph in the second column of page 16 is misplaced in the Proposed Plan. The Site owner stated that this paragraph is in reference to determining what materials meet the definition of PTW and should be placed after the second paragraph under "Main Plant Soils, Impoundments 3, 4 and 5."

Response: Comment noted. The paragraph referenced above has been revised and relocated to the appropriate location under "North Area Soils, Impoundments 3, 4 and 5."

Inaccuracies in Public Comments

17.1 A commenter stated that the Site is adjacent to the Rahway River.

Response: For clarification purposes, the American Cyanamid Superfund site is located adjacent to the Raritan River.

17.2 Several commenters inaccurately referenced the acreage of the Site.

Response: For clarification purposes, the American Cyanamid Superfund site comprises approximately 435 acres.

17.3 A commenter stated that the Pfizer Corporation left the toxins behind.

Response: For clarification purposes, the commenter's statement that the toxins were left behind by the Pfizer Corporation is inaccurate. Pfizer, Inc. assumed responsibility for the American Cyanamid Superfund site as part of its larger acquisition of Wyeth Holdings Corporation in October 2009. The American Cyanamid Company was responsible for most of the contamination at the Site.

Other Comments

18.1 Several commenters requested an extension of the public comment period.

Response: The public comment period began on February 16, 2012 and was initially scheduled to conclude after 45 days on March 31, 2012. In response to several requests for an extension of the public comment period, a 45-day extension was announced by EPA at the March 8th public meeting. Therefore, the public comment period began on February 16, 2012 and concluded on May 15, 2012, resulting in a 90-day public comment period.

18.2 The Site owner recommended that EPA encourage the beneficial reuse of soil from other development projects in the area as a goal during the design and implementation of the proposed remedy.

Response: Comment noted. The beneficial reuse of soil will be evaluated in the RD phase.

18.3 A commenter requested that EPA formally consult with U.S. Fish and Wildlife on the ecological basis of the proposed cleanup plan. The commenter stated that formal consultation should include *de novo* Site-wide ecological impact assessment (including off-site and down-river impacts) in order to assess natural resource injuries and require mitigation, restoration and compensation for all natural resource injuries, as required by law.

Response: The U.S. Fish and Wildlife Service is one of several agencies that have been involved in the remedial investigation of the Site. An informal consultation with the US Fish and Wildlife was conducted through the Endangered Species Act (Section 7). Formal consultation is not typically conducted under CERCLA.

18.4 Several commenters inquired about bid information and contact information for any future work at the Site.

Response: The American Cyanamid Superfund site is a PRP-lead site. Pfizer, Inc. assumed environmental liability for the cleanup of the Site through its purchase of Wyeth Holdings Corporation in 2009 and is anticipated to be in charge of bidding for this project. Therefore, please contact Russell Downey, the Director of Pfizer Environmental Engineering, Remediation and Transactions for Pfizer Global Engineering at:

Russell Downey, Director
Environmental Engineering, Remediation and Transactions
Pfizer Global Engineering
100 Route 206 North, m.s. 6/610
Peapack, New Jersey 07977
email: russell.g.downey@pfizer.com

18.5 A commenter stated that the Proposed Plan's ability to work must be ascertained before it is selected. The commenter stated that EPA issued a ROD for the same impoundments in 1998 and that remedy was found to be wrong after subsequent work during the design phase. The commenter recommended that EPA re-evaluate the Proposed Plan to ensure that history does not repeat itself.

Response: As discussed within the history section of the ROD, a re-evaluation of several of the remedies has already been conducted at the Site. As a result, a Site-wide FS was performed utilizing all the data and information previously obtained at the Site. EPA is confident that the Site-wide FS provides adequate assurance that the selected remedy will be successful in addressing all Site-wide contamination (with the exception of Impoundments 1 and 2 as discussed previously). EPA also re-evaluated the preferred remedy after reviewing all of the written and verbal comments received from the public during the public comment period and concluded this alternative was appropriate for addressing the contamination at American Cyanamid. EPA is confident that the selected remedy will be protective of human health and the environment, while complying with ARARs, being cost-effective and utilizing permanent solutions and alternative treatment technologies to the maximum extent practicable.

18.6 A commenter stated that EPA has a "suspicious record" when it comes to protecting big corporations and suggested that the financial status of big corporations affects the development of feasibility studies and the extent that EPA forces responsible parties to cleanup a Superfund site.

Response: Comment noted.

Part 2. Verbal Comments

1.1 Several commenters from the March 8, 2012 Public Meeting expressed support for EPA's preferred remedy, Alternative 4A.

Response: Comment noted.

2.1 A commenter expressed support for the continued involvement of the current TAG (technical assistance grant) recipient as the community watchdog for the Site.

Response: Comment noted.

2.2 A commenter expressed support for any plans that provide the community with greater access to the Raritan River. The commenter also noted that there is a portion of the Site adjacent to the Bridgewater train station that would be attractive for redevelopment.

Response: As discussed earlier in the response to written Comment 8.2, the future use of the Site will be determined by the Site owner; however, EPA will communicate the commenter's preferences for the reuse of the Site to the Site owner. The current Site owner has discussed a number of potential future uses for the Site ranging from light industrial use to recreational use. It should be emphasized that reuse of any portion of the property would not occur until either the remedy is complete in its entirety or it is determined that reuse would not interfere with the implementation of remediation activities. Please see the "Current and Potential Future Site and Resource Use" section of the Decision Summary of the ROD for a further discussion of the future use of the Site.

3.1 A commenter expressed a desire for the establishment of some kind of public green space as a future use of the Site.

Response: Comment noted. As discussed earlier in the response to written Comment 8.2, the future use of the Site will be determined by the Site owner; however, EPA will communicate the commenter's preferences for the reuse of the Site to the Site owner. Based upon the anticipated remedial completion of the Site, green space is highly likely to be a part of the future redevelopment plans.

Please see the response to written Comment 8.2 for further discussion of the future use of the Site.

3.2 A commenter asked if there were any proposed time frames for returning portions of the property to make it available for future uses, either business or public recreational purposes.

Response: This comment was addressed at the March 8th Public Meeting and the response can be found in Attachment C. EPA anticipates that it will take a number of years to design the selected remedy following the issuance of this ROD. The Site will likely be addressed in phases and some areas may be remediated earlier than others. EPA anticipates that portions of the Site may be made available for public use towards the end of the selected remedy's 10-year implementation time frame. However, it is conceivable that portions of the property could be made available earlier. It should be noted that the reuse of any portion of the property would not occur until either the remedy is complete in its entirety or it is determined that reuse would not interfere with the implementation of remediation activities.

4.1 A commenter asked that as the remediation is undertaken, that it be done in a way that recognizes and minimizes or avoids adverse impacts to the community.

Response: EPA will consider the impacts to the community throughout the remedial process to ensure that impacts to the community are minimized. The safety of Site workers and the surrounding community will be of the utmost concern to EPA throughout the implementation of the remedy. Routine air, groundwater, surface water and sediment monitoring will be conducted throughout the implementation of the remedy to ensure that Site workers and the community are not exposed to unacceptable risks. In addition, all future truck traffic will be analyzed for road and safety impacts within the community.

4.2 A commenter asked that EPA consider appointing a liaison to the community to interface with the community so that a person is available to contact when remedial action activities are undertaken.

Response: This comment was addressed at the March 8th Public Meeting and EPA's verbal response can be found in

Attachment C. EPA has assigned a Community Involvement Coordinator, whose primary responsibility is to involve and inform the public about the Superfund process and the response activities conducted at the Site. Please see the response to written Comment 9.5, which provides contact information for the Community Involvement Coordinator and further discusses the role of this liaison and several of the other community involvement tools utilized by EPA.

5.1 A commenter, who was representing a local Bridgewater committee, stated that the committee was dedicated to working with the Site owner to have an effective, responsible cleanup.

Response: Comment noted.

6.1 A commenter, representing the local sewerage authority, stated that he was very pleased to see the cleanup moving forward, but had several concerns. These individual concerns are addressed below in the responses to Comments 6.1A-6.1C.

6.1A The commenter stated that EPA and the Site owner decided to construct their own treatment plant in July 2012 without notifying the local sewerage authority, which the commenter considers a significant stakeholder in the Site's cleanup.

Response: This information is not correct as stated. At the time of the March 8th public meeting, there had been some preliminary discussion on the possibility of the Site owner constructing and operating a groundwater treatment facility; however, the Site owner did not approach EPA with planning documents for an on-site treatment facility prior to the issuance of this ROD and EPA did not decide to proceed with "discharge to surface water following complete on-site treatment" as the preferred treatment method until September 2012. Based upon a number of comments received indicating a preference for the construction of an on-site treatment plant and an EPA review of the treatment options, EPA decided in September 2012 that the waters collected at the Site will be discharged to surface water following complete on-site treatment. If it is determined that this treatment method is not appropriate or feasible, then collected groundwater will either be re-injected into the ground following complete on-site treatment or be discharged to the local sewerage authority directly or following pre-treatment.

EPA will provide the local sewerage authority information pertaining to the Site's groundwater treatment decisions and also provide a copy of the quarterly progress reports to inform the authority of the Site's progress throughout design and implementation of the remedy.

6.1B The commenter stated that it makes sense and is logical for the Site owner to construct an on-site treatment plant due to the wide range of contaminants found at the Site.

Response: Comment noted.

6.1C The commenter noted that a Site owner submitted an application to NJDEP for permit equivalency under a General Groundwater Remediation Permit and that this is not appropriate or protective of the river. The commenter stated that a General Permit is not appropriate because of the size, complexity and scope of the groundwater remediation at the Site. The commenter also stated that the permit should be based upon effluent water quality standards. Another commenter, also representing the sewerage authority, discussed how the Raritan River is listed as impaired for benzene and arsenic; therefore, the effluent limits for these constituents should be set to their respective surface water quality standards.

Response: As discussed earlier in the response to written Comment 5.3, a permit equivalency was issued to the Site owner in May 2012. The permit equivalency for the interim treatment plant is not classified as a general permit equivalency, but, rather, is classified as individual because it establishes individual discharge effluent limits and monitoring requirements. Because the Raritan River has been identified as impaired for arsenic and benzene, discharge limits were imposed for these two constituents. The discharge limits imposed for these two constituents must be equal to the New Jersey surface water quality standards of 0.017 and 0.15 micrograms per liter, respectively. However, the NJSWQS for arsenic and benzene are more stringent than the quantification limit. Therefore, the enforceable daily maximum concentration is 8 micrograms per liter for arsenic and 7 micrograms per liter for benzene. Please see the response to written

Comment 5.3 for a further discussion of the permit equivalent for the interim treatment plant.

7.1 A commenter stated that the Site owner was not forthcoming and claimed that the Site owner only reported the benzene seeps to EPA after the commenter's organization identified the issue.

Response: The commenter's statement above is inaccurate. On December 6, 2010, investigations were conducted by the Site owner's contractors to evaluate possible discharges of groundwater to surface water bodies in the vicinity of Impoundments 1 and 2. This evaluation included a seep reconnaissance, well inspections for nonaqueous phase liquid and a groundwater/surface water temperature evaluation in standing water south and east of Impoundments 1 and 2. On December 6, 2010, the Site owner's contractor collected a surface water sample from the Raritan River immediately adjacent to a seep in the bank of the river downgradient of Impoundments 1 and 2. This sample was received by the laboratory on December 8, 2010. Preliminary laboratory analytical results were reported to the Site owner on January 6, 2011 indicating that the discharges contained up to 20,000 parts per billion of benzene. The preliminary laboratory results were reported to both EPA and NJDEP on the same day that the results were received by the Site owner.

7.2 A commenter stated that he is opposed to Alternative 4A and that EPA should be looking at all the remedies that could possibly be used on the wastes at the Site.

Response: As discussed previously, several alternatives were developed to address contaminated media and their specific location within the Site. These alternatives were analyzed individually against EPA's nine evaluation criteria to determine the appropriate remedial action consistent with CERCLA. Please see the response to Comment 2.1 in the written comments section for a further discussion of why Alternative 4A was selected over other alternatives.

7.3 A commenter stated that the contaminants should not be stabilized and left on-site in a cement matrix.

Response: EPA believes that in-situ S/S and capping is an appropriate component of the remedy to address the contamination at the Site. The selected remedy will be protective of human health and the environment, will comply with ARARs and will meet the remainder of EPA's nine evaluation criteria. See the "Comparative Analysis of Alternatives" section in the Decision Summary of the ROD for a further discussion of why Alternative 4A was selected over other alternatives.

7.4 A commenter questioned EPA's assurances that Alternative 4A, which includes the placement of additional fill in the flood plain, will not impact flooding.

Response: As discussed previously, the Site owner will be required to comply with the substantive requirements of the New Jersey Flood Hazard Control Act Rules regarding filling in a flood hazard area. The Site owner has indicated that a major goal of the selected remedy's design will be to minimize the loss of flood storage at the Site. A preliminary evaluation conducted by the Site owner indicated that the potential removal of the Site's flood control berm (or portions of it) would actually increase the Site's current flood storage capacity by over 200 million gallons for more common flood events. Even if minor changes to the Site's flood storage capacity were to occur, the Site would have little to no impact on downstream flood elevations and the surrounding community. Please see the response to Comment 3.9 in the written comment section for a further discussion of the Site's flood storage capacity.

7.5 A commenter stated that EPA has the opportunity to improve the Site so that it can be used to actually prevent flooding elsewhere.

Response: As discussed in Comment 3.9 in the written comments section, the eventual removal of the Site's flood control berm would increase the Site's current flood storage capacity by over 200 million gallons during common flood events. This will have a positive impact on the immediate surrounding areas during typical flooding because the removal of the berm around the North Area will increase the storage capacity for Raritan River flood waters.

7.6 A commenter questioned the implementation time frame for Alternative 4A.

Response: As discussed previously, EPA does not believe that the implementation time frames are overestimated for any of the alternatives. If any inaccuracies do, in fact, exist, the implementation time frames for some of the alternatives may be slightly underestimated. Please see the response to Comment 7.3 in the written comments section for a further discussion of the accuracy of the implementation time frames.

7.7 A commenter recommended that EPA select a modified version of Alternative 7, which incorporates thermal desorption.

Response: As discussed previously, alternatives involving low temperature thermal desorption were not selected for a number of reasons, the most significant being the limited effectiveness of LTTD on the types of waste at the Site. Also increased air emissions associated with such a remedy may be difficult to control. Please see the response to Comment 4.2 in the written comments section for a further discussion of why a modified version of Alternative 7 was not selected.

7.8 A commenter stated that soils were being remediated under a previous ROD until the cleanup was stopped midstream so that a better approach could be developed. The commenter stated that the approach developed eight years later is the least protective for the community and the least cost for the Site owner.

Response: Please see the response to Comment 7.1 in the written comments section, which explains why remedial activities were suspended in 2004 and discusses some of the remedial activities conducted between 2004 and 2012. Please see the response to Comment 2.1 in the written comments section, which explains that Alternative 4A is not the least protective and lowest cost alternative.

7.9 A commenter expressed concern over changes in EPA’s regulatory authority and funding in the future and how that might affect the long-term monitoring for the Site.

Response: Funding under “Superfund” is replenished primarily from general tax revenues and from settlements with potentially responsible parties (PRPs) at Superfund sites, which reimburse EPA for its past costs in cleaning up sites. EPA funds 90 percent of actual remediation costs at sites where no viable PRPs are available, and the individual states provide the remaining 10 percent. At many sites with viable PRPs, EPA seeks settlements whereby the

PRPs either perform the cleanup work themselves or fund the work, with EPA oversight. At the American Cyanamid site, EPA will pursue the PRPs to fund the remediation with EPA oversight.

7.10 A commenter noted that the entire Site is a flood plain, yet EPA and the Site owner only want people to think that part of the Site is located in the flood hazard area.

Response: As discussed in the response to Comment 3.7 in the written comments section, it has been clarified and recognized previously that the entire Site lies within the flood hazard area of the Raritan River, with the exception of the Impoundment 8 Facility. EPA has also re-designated the Site into five new areas for ease of understanding. As shown on Figure 2 in Appendix I of the OU4 ROD, the Site is now divided into the following five areas: North Area, South Area, West Area, East Area and the Impoundment 8 Facility. The North Area, which was referred to as the Main Plant area in previous documents, refers to that portion of the Site property within a flood control dike. The portion of the Site previously referred to as the Flood Plain area has been separated into the following three areas: West Area, South Area and East Area. The West Area refers to the portion of the Site bounded by the Somerset County Recycling Center to the north, the Raritan River to the west, the Port Reading rail line to the south and the flood control berm to the east. The South Area refers to the portion of the Site located west of Interstate-287 between the Port Reading rail line and the Raritan River. The East Area, which is the only portion of the Site located in the Borough of Bound Brook, refers to the small triangular portion of the Site located to the east of Interstate-287. The Impoundment 8 Facility, which is designated as a corrective action management unit (CAMU) under RCRA, is located to the northwest of the Site across Polhemus Lane. The entire Site lies within the flood hazard area of the Raritan River, with the exception of the Impoundment 8 Facility. The “Site Name, Location and Description” section in the Decision Summary of the ROD includes an explanation of these new areas and explicitly acknowledges that the entire Site lies within the flood hazard area of the Raritan River, with the exception of the Impoundment 8 Facility.

7.11 A commenter expressed concern over whether an engineered capping system designed for a 500-year flood will be capable of withstanding the frequent flooding at the Site.

Response: Please see the response to Comment 3.2 in the written comments section, which discusses the design of the capping systems and the practicability of capping in a flood hazard area.

7.12 A commenter stated that EPA should do a cleanup in two to five years and clean it up once and for all.

Response: EPA does not believe that completing a cleanup within five years is feasible due to the Site's size and complexity. The Site contains approximately 284 acres of impacted soils and about 23 acres of contaminated impoundments, as well as the contaminated groundwater beneath the Site. These impacted media are contaminated with a wide range of contaminants, such VOCs, SVOCs and metals. The implementation time frame for the selected remedy is 10 years for impoundments and soils and 30 years for groundwater. The 10-year implementation time frame for impoundments and soils is significantly shorter than several of the other alternatives, such as Alternatives 7 and 11, which have estimated implementation time frames of 20 or more years.

7.13 A commenter stated that a cap is not a permanent solution, but, rather, is an engineering control that will eventually fail.

Response: EPA is confident that the use of engineered caps in the selected remedy will be protective of human health and the environment in both the short-term and the long-term. Please see the response to Comment 2.1 in the written comments section, which addresses concerns that Alternative 4A is not a long-term solution. Please also see the response to Comment 3.2 in the written comments section, which discusses the design details of the engineered capping systems and concerns over the practicability of capping in a flood plain, respectively.

8.1 A commenter stated that the entire Site needs to be recognized as being within the flood hazard area of the Raritan River.

Response: The Decision Summary of the ROD acknowledges that the entire Site lies within the flood hazard area of the Raritan River, with the exception of the Impoundment 8 Facility. Please see the response to Comment 3.7 in the written comments for further discussion of the terminologies used to delineate the Site.

8.2 A commenter stated that a permit is needed from NJDEP for the placement of fill in a flood plain, which is a component of Alternative 4A. The commenter noted that the Site-wide FS claims that a permit has already been obtained for the placement of fill in the flood hazard area.

Response: As noted in Comment 3.10 in the written comments section, a stream encroachment permit was obtained by the Site owner in January 2008 granting permission to place temporary stockpiles of fill in the flood plain in connection with a future CERCLA remedial program for installation of engineered protective covers as part of a Site-wide remedy. Therefore, the Site-wide FS correctly states that a permit has been obtained for the placement of the fill for capping within a flood plain. Please see the response to Comment 3.10 in the written comments section for further discussion of the permit requirements for the placement of fill in a flood hazard area.

8.3 A commenter provided an estimate of the number of trucks that will be needed to transport clean fill to the Site under Alternative 4A. The commenter stated that this is a short-term adverse impact that was not addressed in the Site-wide FS. The commenter recommended that EPA consider the use of rail transportation.

Response: As previously discussed, all transportation options, including the use of trucks and rail, will be evaluated in the remedial design phase to minimize the impact on the community. Please see the response to Comment 9.9 in the written comments section, which further discusses the transportation of materials under Alternative 4A.

8.4 A commenter mentioned another Superfund site in New Jersey where the principle threat waste was removed and the remainder of the site was stabilized and capped. The commenter noted that PTW is to be stabilized under the proposed remedy and recommended that treatability studies be conducted prior to the selection of a remedy.

Response: Please see the response to Comment 4.3 in the written comment section for a discussion of why EPA did not select a remedy involving excavation and off-site disposal. Please also see the response to Comment 6.4 in the written comments section, which discusses why treatability studies were not conducted prior to the selection of a remedy.

8.5 A commenter stated that the Impoundment 8 Facility is not utilized under Alternative 4A and suggested that this facility could be used to minimize the volume of material remaining in the flood plain. The commenter also stated that this facility's use should be maximized under any alternative selected.

Response: Please see the response to Comment 4.4 for an explanation of why EPA is not utilizing the Impoundment 8 Facility for the disposal of a large quantity of material.

9.1 A commenter noted that EPA has concern over the air emissions for Alternatives 7 and 11. The commenter stated that there would be an impact with transporting clean fill to the Site. The commenter stated that 48,000 trucks bringing in clean fill will also result in 48,000 trucks taking out toxic waste and the commenter stated that this needs to be considered.

Response: For clarification purposes, Alternative 4A does not call for the transportation of hazardous materials through the community. Please see the response to Comment 9.1 in the written comments section, which discusses concerns over increases in truck traffic through the community.

9.2 A commenter expressed concern over the frequent flooding at the Site and the ability of the engineered capping systems to withstand flooding. The commenter stated that all impacted material in the flood plain needs to be removed. The commenter expressed concern about potential scouring and lift causing failure of the caps.

Response: Please see the response to Comment 3.2 in the written comment section, which further discusses the design of the engineered capping systems and the practicability of capping in a flood hazard area. Also, see the response to Comment 4.3 in the written comments section for an explanation of why EPA did not select an alternative involving off-site disposal.

9.3 A commenter stated that slurry walls and other mechanisms to control groundwater could work; however, the commenter stated that this needs to be looked at in more detail, particularly with respect to the impact of flooding on these systems.

Response: Comment noted. The design details of all components of the selected remedy, including the groundwater component, will need to be developed during the RD phase. The frequent flooding conditions experienced at the Site will be incorporated into the design of all components of the selected remedy, as necessary.

9.4 A commenter stated that the Site is a “time bomb,” particularly Impoundments 1 and 2, and needs to be addressed quickly before a more serious problem arises.

Response: EPA agrees that the Site needs to be addressed in a time-efficient manner. The implementation time frame for the selected remedy is shorter in comparison to several of the other remedial alternatives that were not selected. As noted in the response to Comment 15.2 in the written comments section, Impoundments 1 and 2 are being addressed in a separate FFS due to their waste characteristics and proximity to the Raritan River. A number of protective measures have been taken at Impoundments 1 and 2 to reduce their threats to human health and the environment until a long-term solution can be developed. Please see the response to Comment 15.2 in the written comments section for a further discussion of the status of Impoundments 1 and 2.

9.5 A commenter expressed concern over the Site’s impact on the Raritan River, particularly with the use of downstream water intakes and the recreational use of the river.

Response: In May 2012, the construction of a groundwater removal system was completed to address groundwater discharges into the Raritan River in the vicinity of Impoundments 1 and 2. Please see the response to Comment 6.4 in the written comments section for the status of this response action conducted under EPA’s removal program.

EPA anticipates that the selected remedy will address contamination that may be migrating from the Site into Cuckel's Brook and the Raritan River. The existing bedrock groundwater collection system will be improved by relocating the primary extraction wells to a more central location and through the placement of additional extraction wells, as necessary, to ensure that all Site-related groundwater is captured. In addition, a recovery system (such as trenches, wells and/or containment walls) will also be constructed for collection of overburden groundwater at several locations. The details of these improvements will be developed during the remedial design phase.

In addition, an updated surface water and sediment monitoring program was completed in August 2012 with the primary objective of better characterizing the potential impacts of the Site on the Raritan River and Cuckel's Brook. The monitoring program, along with historical surface water and sediment data, will also be used to determine if water quality conditions improve following the response actions conducted under EPA's direction.

9.6 A commenter recommended that any discharges from the Site meet all surface water quality standards.

Response: Please see the response to Comment 5.3 in the written comments section, which discusses the effluent limits for the interim treatment plant.

9.7 A commenter encouraged EPA to keep the Site owner accountable and make sure the Site is cleaned up properly.

Response: EPA will continue working with the Site owner to remediate the Site according to the remedy selected in a time-efficient manner, while taking the necessary precautions to ensure the protection of human health and the environment.

10.1 A commenter noted that he walked through several of the towns impacted by the August 2011 flooding and observed the destruction to these communities. The commenter noted that the U.S. Army Corps of Engineers is constructing flood prevention mechanisms in these towns to reduce flooding impacts. The commenter stated that the placement of fill for the selected remedy will displace flood waters and increase flooding in the area. The commenter stated that the remediation effort should be geared towards mitigating flood impacts, along with addressing the contamination. The commenter also urged that EPA look at the entire Site as a flood plain.

Response: Please see the response to Comment 3.9 in the written comments section, which discusses the placement of fill as part of the selected remedy and its impact on the Site’s flood storage capacity. Please see the response to Comment 3.12 in the written comments section for a discussion of the use of the Site as a flood storage project. Please also see the response to Comment 3.7 in the written comments for clarification of what portions of the Site are located in the flood hazard area of the Raritan River.

11.1 A commenter, representing the TAG recipient, stated that he prefers treatment technologies that are proven, reliable and can be implemented within a relatively short period of time. Based upon this, the commenter endorsed Alternative 4A.

Response: Comment noted.

11.2 A commenter recommended that there be pilot testing of the waste impoundment material to optimize the type of solidification/stabilization that is used and to find the most effective composition of S/S mixture.

Response: As discussed previously, treatability testing for in-situ S/S will be conducted prior to full-scale implementation. Please see the response to Comment 6.3 in the written comments section for more information on the treatability studies for S/S.

11.3 A commenter recommended that the materials in Impoundments 13, 17 and 24 be classified in the three categories: direct contact control, vapor control and movement control. The commenter recommended that any materials classified in anyone of these three categories be excavated and addressed appropriately in the Main Plant area.

Response: For Impoundments 13, 17 and 24 (located in the South and West Areas), an ecological risk assessment would be conducted during the design phase to identify if any material requires relocation and consolidation in the North Area where the same types of controls are warranted. For example, if any materials in Impoundments 13, 17 and 24 require movement control, they will be excavated and placed into Impoundments 3, 4 and 5 for treatment via in-situ S/S and capping.

11.4 A commenter recommended that principle threat waste, no matter where it is located in the Site, should be consolidated into Impoundments 3, 4 and 5 for treatment via in-situ S/S.

Response: Under the selected remedy, any materials identified as principle threat waste, with the exception of Impoundments 1 and 2 as described earlier, will be excavated and relocated to Impoundments 3, 4 and 5 for treatment, regardless of their location.

11.5 A commenter stated that he favors and recommends the construction of an on-site treatment plant designed specifically for the contaminants found at the Site.

Response: Comment noted. Please see the response to Comment 5.1 in the written comments section, which discusses the preference for the construction of an on-site treatment plant indicated by several other commenters.

11.6 A commenter stated that he generally endorses the groundwater component of the remedy; however, the commenter expressed concern over the reliance upon the local sewerage authority for the treatment of contaminated groundwater. The commenter stated that he has seen no evidence that the local sewerage authority is capable of treating the range of contaminants found at the Site. The commenter recommended that effluent limits for Site-related contaminants be imposed for the local sewerage authority's discharge for the extent that the authority's treatment facility is used for the treatment of the Site's stormwater and groundwater.

Response: Comment noted. Please see the response to Comment 5.5 in the written comments section, which discusses concerns over the treatment of Site groundwater at the local sewerage authority.

11.7 A commenter provides several reasons why he does not believe that LTTD will effectively treat the wide range of contaminants found at the Site.

Response: As discussed previously, EPA agrees that low temperature desorption technology would not be effective in treating the wide range of waste materials to be addressed by the OU4 remedy. Please see the response to Comment 4.2 in the written comments section for a further discussion of why alternatives involving LTTD were not selected.

12.1 A commenter indicated that he would like to see treatment where the contaminants are eliminated rather than contained.

Response: EPA has determined that S/S technologies are considered a form of treatment. The ROD provides an in-depth analysis through the nine evaluation criteria for remedy selection that the EPA developed to address the statutory requirements and preferences of CERCLA. Please see the responses to Comments 4.2 and 4.3 in the written comments section for a further discussion of why alternatives involving other treatment technologies were not selected.

12.2 A commenter stated that he believes specific bioremediation products were not considered when developing a remedy.

Response: Enhanced bioremediation was included in the identification and screening of technologies process and was included as a representative process option for both impoundment contents and Site-wide soils in the Identification and Screening of Technologies Report. Because it was determined that bioremediation would need to be combined with other technologies to address effectively the contaminants at the Site, this technology was included in the development of Alternatives 9 and 10. These alternatives, however, were not retained for further evaluation in the screening process for a number of reasons. In addition, a 1998 ROD at the Site included biotreatment as a component of the selected remedy and it was later determined that this technology was technically infeasible for the wastes at the Site. Please see the response to Comment 4.3 in the written comments section for a further discussion of why alternatives involving bioremediation were not selected.

12.3 A commenter expressed concern that “the treatment facility that Pfizer implemented for the groundwater is contaminated.”

Response: This statement is incorrect and unfounded as implied. Up until May 2012, no treatment facilities were operated on-site by Pfizer. When making this statement at the March 2012 public meeting, the commenter was likely referring to the effluent limits for the interim groundwater treatment plant being constructed at that time. Please see the response to Comment 5.6 for the status of the removal action to address the groundwater seeps in the Raritan River in the vicinity of Impoundments 1 and 2. Please also see the response to Comment 5.3, which discusses concerns over the effluent limits for the interim treatment plant.

13.1 A commenter stated that any proposed remediation plan that leaves waste on-site will continue to leak volatile organic compounds and any engineered solution will fail at some point.

Response: EPA disagrees with this statement. EPA is confident that the selected remedy would be protective of human health and the environment, would comply with ARARs, would be cost-effective and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Please see the response to Comment 2.1 in the written comments section for a further discussion of the selection of Alternative 4A over other alternatives. Please also see the response to Comment 3.2 in the written comments section for a further discussion of the practicability of capping in a flood hazard area.

13.2 A commenter expressed concern over the Site’s impact on flooding for downstream communities. The commenter also stated that he is not sure whether NJDEP will approve filling in a flood plain.

Response: As discussed previously, the Site owner has indicated that a major goal of the selected remedy’s design will be to minimize the loss of flood storage at the Site. The selected remedy can be designed to minimize the loss of flood storage so that it would have little to no impact on downstream flood elevations and the surrounding community. The remedy will comply with the substantive requirements of the New Jersey Flood Hazard Control Act Rules regarding filling in a flood hazard area. Please see the response to Comment 3.9 in the written comments section for a further discussion of the concerns over the placement of fill and the remedy’s impact on the flood storage capacity of the Site.

13.3 A commenter stated that the volatile organic compounds at the Site have to be disposed of.

Response: The volatile organic compounds associated with the Site will be treated as discussed in the ROD. VOCs found in the Site groundwater will be captured and treated. VOCs found in soils will either be capped with an engineered capping system (including a vapor mitigation system in some areas, as required) or treated via in-situ S/S followed by capping. VOCs in Impoundments 3, 4 and 5 will also be treated via in-situ S/S followed by capping. Please see the response to Comment 4.3 in the written comments section, which discusses why alternatives involving off-site disposal were not selected.

13.4 A commenter discussed the benzene effluents limits for the interim groundwater treatment plant.

Response: Please see the second paragraph in the response to Comment 5.3 in the written comments section, which discusses the effluent limits for the interim treatment plant.

13.5 A commenter, who identified himself as an Environment Trustee for a local Bridgewater community group, noted that his community helped supply some of the clean fill for some historical capping activities. The commenter indicated that his community has clean fill and would be glad to talk to any stakeholders in this process.

Response: Comment noted. Sources for clean fill will be identified during either the remedial design or remedial action work plan.

14.1 A commenter asked whether any sampling data were collected during and/or following the Hurricane Irene-related flooding. The commenter stated that he is concerned about some of the tests and studies conducted and urged EPA to make the data from these studies available.

Response: Several rounds of surface water sampling were conducted on the floodwaters from the most recent flooding events, i.e., Hurricane Irene and Tropical Storm Lee. The North Area, where the majority of waste disposal activities occurred, is surrounded by a flood protection berm. During the Hurricane Irene storm event, flood waters overtopped this berm and flooded the North Area of the Site. The flood protection berm prevented flood waters in this portion of the Site from receding and created a ‘lake’ of standing water. Several rounds of sampling were performed on this standing water to ensure that it would not impact the water quality of Cuckel’s Brook and the Raritan River. After the sampling results confirmed that contaminant concentrations were below levels of concern, the standing water was released under controlled conditions so that local communities downstream were not affected. This standing water was released to Cuckel’s Brook several weeks after the Hurricane Irene storm event in a way that did not cause flooding in downstream communities. The sampling conducted on this standing water within the bermed area provided an indication of the water quality conditions during and immediately after flooding. Based upon the results of this sampling, it is unlikely that Site contaminants affected any nearby businesses or communities both during and after the flood event.

On September 13, 2012, a CD-ROM containing Hurricane Irene-related sampling data were mailed to the commenter.

14.2 A commenter asked whether there was subsequent cooperation between EPA and all of the stakeholders, such as American Water.

Response: EPA began issuing detailed quarterly updates via email to the community and all interested stakeholders in July 2012. The quarterly updates document the project status and focus on major tasks completed over the past quarter, as well as anticipated tasks for the upcoming quarter. To date, all stakeholders have been receptive to the Site owner activities and supportive of EPA and NJDEP oversight.

14.3 A commenter expressed concern over air emissions and noted that people live near the Site.

Response: It was mentioned briefly at the March 8th public meeting, that an Ambient Air Monitoring Plan was currently under review. This plan was approved by EPA and NJDEP in June 2012 and the first round of air sampling occurred in July 2012. The purpose of this monitoring plan is to collect baseline ambient air sampling data on a quarterly basis for at least two years. The results of this monitoring will be utilized to ensure that the community is not exposed to unacceptable risks, as well as to use as a baseline during the implementation of the Site-wide remedy in the future.

Air emissions will also be monitored on an activity-basis throughout the implementation of the selected remedy to ensure that the surrounding community is not exposed to unacceptable risks.

15.1 A commenter asked a series of questions regarding air emissions, which are addressed below in the responses to Comments 15.1A-15.1E.

15.1A The commenter noted that one of the reasons EPA rejected several of the alternatives was due to the air emissions associated with them. The commenter asked whether EPA is currently conducting air sampling at the Site.

Response: Please see the response to Comment 14.3 in the verbal comments section.

15.1B The commenter stated that EPA does not have baseline air emissions data to compare with post-remedy emissions data. The commenter also asked how some remedial alternatives could be dismissed based upon air emission impacts, when baseline data have not been collected.

Response: As discussed previously, the purpose of the ambient air sampling effort initiated in July 2012 is to ensure that the community is not exposed to unacceptable risks, as well as to use as a baseline during the implementation of the Site-wide remedy in the future. Please see the response to Comment 14.3 in the verbal comments section for a further discussion of the ambient air monitoring program.

Also discussed previously, a qualitative assessment was utilized to estimate the air emissions for the remedial alternatives in the Site-wide FS. This qualitative assessment for identifying emissions is called the emission “drop” factor method. This method is approved by the NJDEP for use in developing air permits and consists of developing a unitless emission (drop) factor based on the lifting and dropping of a unit mass of material. Please see the response to Comment 6.6 in the written comments section for a further discussion of the air emissions calculations for the remedial alternatives.

15.2 A commenter mentioned the Crown Vantage Landfill Superfund site, which is located in Hunterdon County near the Delaware River. The commenter stated that the Crown Vantage site is not as flood-prone as the American Cyanamid site, yet the scouring associated with flooding at the Crown Vantage site contributed to the selection of a remedy that primarily involved excavation.

Response: For clarification purposes, the selected remedy at the Crown Vantage Superfund site called for institutional controls and five-year reviews, as well as the maintenance of the forested cover and stabilization wall. The ROD did not call for excavation. Prior to the construction of a stabilization wall in the remedial investigation phase, a high flow event resulted in landfill material falling into the Delaware River and an EPA Removal Action was carried out to excavate exposed drum material.

EPA is confident that the waste at the American Cyanamid site can be successfully contained, following treatment and/or capping in some areas, without presenting an unacceptable risk to human health and the environment. Please see the response to Comment 4.3 in the written comments section for a discussion of why EPA did not select a remedy involving excavation and off-site disposal.

15.3 A commenter expressed concern over leaving material in the flood plain and stated that there should be a maximal effort to excavate and dispose of the materials off-site.

Response: Please see the response to Comment 3.2 in the written comments section, which discuss the design of the engineered caps and the practicability of capping in a flood hazard area. Please also see the response to Comment 4.3 in the written comments section, which further discusses why EPA did not select a remedy involving off-site disposal.

15.4 A commenter expressed concern over the effluent limits for the interim treatment plant constructed as part of an EPA Removal Action.

Response: Please see the second paragraph in the response to Comment 5.3 in the written comments section, which discusses the effluent limits for the interim treatment plant.

15.5 A commenter stated that he does not believe it is credible that the BERA determined that the Site is not impacting the health and diversity of aquatic communities in the Raritan River and Cuckel's Brook. The commenter requested that the BERA and its findings be reviewed by U.S. Fish and Wildlife Service.

Response: Based on review of the 2005 BERA by both NJDEP and EPA's Biological Technical Assistance Group, it was concluded that the Site is not impacting the health and diversity of aquatic communities. The U.S. Fish and Wildlife Service is one of several agencies that have been involved in the remedial investigation of the Site. A comprehensive Site-wide surface water and sediment monitoring program will continue to be utilized to monitor the potential impacts of the Site and other possible sources of impacts on the Raritan River and Cuckel's Brook.

16.1 A commenter cited the heterogeneity of the wastes and stated that LTTD is not geared to address or remediate the wastes at the Site.

Response: Comment noted.

16.2 A commenter stated that bioremediation is not appropriate for the Site and was unsuccessful after being selected in the 1998 ROD.

Response: Comment noted.

16.3 A commenter expressed concern of interminable delays which caused the first iteration of the Site-wide FS because EPA failed to respond to comments in a time-efficient manner and that EPA may not have directed the proper resources to this project. The commenter also expressed concern over communication between different divisions of EPA, such as the lack of communication between the Superfund Program and the Division of Environmental Planning and Protection regarding the impairment designation of the Raritan River in 2006. Finally, the commenter asked that EPA move forward with this project as expeditiously as possible.

Response: EPA recognizes the critical remedial measures to be implemented at the Site and understands that the remedies will need to be carried out as soon as practicable while taking the necessary precautions to ensure the protection of human health and the environment.

In regard to the concern over the resources directed toward the Site, which was addressed at the March 8, 2012 public meeting, EPA noted that multiple Superfund remedial project managers and a community involvement coordinator are assigned to the American Cyanamid site; they are coordinating with other regional staff as necessary. In addition, senior Superfund program management is also closely involved.

17.1 A commenter stated that it cannot be denied that the site is located in a flood plain and the site will continue to flood frequently in the future. The commenter stated that the Proposed Plan does not deal with the fact that the entire Site is located in a flood plain.

Response: This comment was partially addressed at the March 8th public meeting, where EPA acknowledged that the entire Site is located in the flood hazard area of the Raritan River. Please see the response to Comment 3.7 in the written comments section, which explains what portions of the Site are located within a flood hazard area and clarifies the historical terminologies used to divide the Site. Please also see the response to Comments 3.2 in the written comments section for a discussion of the design of the engineered caps and the practicability of capping in a flood hazard area.

17.2 A commenter asked if the total environmental impact of the remediation has been calculated, such as the trucks and the production of concrete.

Response: This comment was addressed at the March 8, 2012 public meeting. EPA indicated that this type of calculation has not been performed. This type of calculation is not typically performed when selecting a remedy for Superfund sites. However, EPA did conduct a detailed analysis of the individual response measures against each of EPA's nine evaluation criteria and completed a comparative analysis focusing upon the relative performance of each response measure against the criteria. Please see the "Comparative Analysis of Alternatives" section of the Decision Summary in the ROD for a comparison of all of the remedial alternatives with respect to the EPA's nine evaluation criteria.

17.3 A commenter asked who is going to pay for the degradation of downstream ecosystems caused by the Site.

Response: This comment was addressed at the public meeting held on March 8, 2012 when it was noted that there are Natural Resource Trustees that seek compensation for damages to natural resources which have occurred as a result of releases of hazardous substances or as a result of resource injury related to the implementation of the response action. EPA indicated that some of these trustees typically include the U.S. Fish and Wildlife Service, the National Oceanic and Atmospheric Administration and the State of New Jersey. A goal of the remedial program will be concurrent planning and implementation of prospective Natural Resource Damage restoration measures with the implementation of the selected remedy. This could involve the enhancement and preservation of ecological habitat and recreational resources at the Site.

18.1 A commenter, who identified himself as a member of several local committees, noted that he has lived within three miles of the Raritan River his entire life and that he has had the opportunity to visit the Site and observe its size and complexity. The commenter stated that the Proposed Plan appears to be a balanced approach that utilizes proven conventional technologies, minimizes risks during construction, minimizes surface disturbance and can be implemented within a reasonable time frame. The commenter also stated that it permits future use for parts of the Site, including ecological restoration for 370 acres, 30 acres for potential commercial usage and 36 acres for alternative energy generation.

Response: Comment noted. Please see the response to Comment 8.2 in the written comments section, which discusses the future use of the Site.

18.2 A commenter noted that some people have indicated that they would like to see more studies before taking action. The commenter then stated that he thinks that the treatability studies conducted during the design phase will clear up some of the uncertainties of the Proposed Plan and allow EPA to design a remedy that is protective of human health and the environment.

Response: Comment noted.

19.1 A commenter, who identifies himself as the chairman of the TAG-recipient, discussed some of the history of the Site and the role of the TAG-recipient over the last eighteen years. The commenter also noted that Impoundments 1 and 2 still need to be addressed.

Response: Comment noted.

19.2 A commenter indicated that he would like to see the interim treatment plant's discharge be controlled for benzene and other VOCs.

Response: Please see the response to Comment 5.3 in the written comments section, which discusses concerns over the effluent limits for the interim treatment plant.

19.3 A commenter asked if the interim treatment plant is going to become operational soon.

Response: The interim treatment plant began operating in May 2012. Please see the response to Comment 5.6 in the written comments section for more information on the status of the interim treatment plant constructed under EPA's removal program.

19.4 A commenter encouraged EPA and the Site owner to seek measures to expedite the Site cleanup.

Response: EPA will continue to work with the current Site owner to remediate the Site in a time-efficient manner, while taking the necessary precautions to ensure the protection of human health and the environment.

19.5 A commenter indicated that he is in favor of implementing Alternative 4A.

Response: Comment noted.

19.6 A commenter asks why it is going to take 10 years to implement Alternative 4A.

Response: Based upon the estimates described in the Site-wide FS, the remedy under Alternative 4A will require 10 years to implement in its entirety. The design phase of the remedy, which is anticipated to be about 2 to 3 years, includes conducting pre-design investigations to confirm the delineation of the areas requiring movement, vapor and direct contact controls. In addition, treatability testing for in-situ S/S will be required prior to the full-scale implementation to optimize the in-situ S/S performance. The remedial action phase of the selected remedy would also take a number of years to complete, primarily due to the size of the Site. The selected remedy addresses nearly 200 acres of potentially impacted soil and 23 acres of impoundments contents. The selected remedy is anticipated to include a 24-inch soil cap for about 190 acres of the Site, with some areas receiving a vapor control cap and vapor mitigation system prior to the installation of a soil cover system. This will result in the transportation of over 577,000 cubic yards of clean fill to the Site. The transportation of such a large volume of soil is a major effort and may be required to occur over an extended period of time to minimize the impact to the community. It is also anticipated that the selected remedy will involve the in-situ S/S treatment of over 200,000 cubic yards of impoundment material. The size and complexity of the Site increases the duration of the design and remedial action phases and contribute to the 10-year implementation time frame of the selected remedy.

20.1 A commenter requested a 60-day extension of the public comment period.

Response: As addressed at the March 8, 2012 public meeting, EPA indicated that an additional 45-day extension would be granted.

20.2 A commenter asked to submit two petitions into the public record.

Response: These petitions were included in Attachment D of the Responsiveness Summary and were addressed in the written comments section of the Responsiveness Summary.

20.3 A commenter stated that she is in favor of using LTTD in areas of the Site where soils can be treated. The commenter discussed another Superfund site where LTTD has been implemented. The commenter also expressed concern over the cost estimates for LTTD in the Site-wide FS.

Response: See the response to Comment 4.2 in the written comments section, which explains why EPA believes that low temperature thermal desorption is not an appropriate technology for the wastes at the Site and discusses the use of LTTD at other Superfund sites in Region 2. As mentioned earlier, EPA reviewed the cost estimates for Alternatives 4A and 7 in the Site-wide FS and concluded that the cost estimates for both alternatives are within the accuracy range of -30 to +50% of the original estimates. Please see the response to Comment 4.8 in the written comments section for further discussion on the accuracy of the cost estimates in the Site-wide FS.

20.4 A commenter stated that there was not enough time for everyone in the room to provide verbal comments and suggested that there be a second public meeting or some other forum where people are able to provide verbal comments.

Response: EPA accepted both verbal and written comments at the public meeting held on March 8, 2012. EPA also accepted written comments throughout the 90-day, extended from the original 45-day, public comment period. EPA reviews and considers all of the information submitted during the three month long public comment period before selecting this remedy. No preference is given to verbal comments versus written comments, or vice versa, throughout EPA's review of the public comments. Therefore, EPA believes that members of the community have been granted sufficient time and opportunity to provide comments on the Proposed Plan.

20.5 A commenter stated that she supports Alternatives 7 and 11, or any alternative that treats and/or excavates soil as opposed to containing it.

Response: Please see the response to Comment 4.2 in the written comments section for a discussion of why EPA believes that LTTD is not an appropriate technology for the wastes at the Site. Please also see the response to Comment 4.3 in the written comments section, which further discusses why EPA did not select a remedy involving off-site disposal, such as Alternative 11.

20.6 A commenter stated that a cap is not a cleanup, noted that the Site is in a flood plain, and stated that toxic waste cannot be capped in a flood plain.

Response: EPA has utilized caps at many Superfund sites across the country and considers engineered capping as a viable remedy at Superfund sites. Please see the response to Comment 3.2, which discusses the design of the engineered caps and the practicability of capping in a flood hazard area.

21.1 A commenter expressed concern over the effluent limits for the interim groundwater treatment plant and the impact the discharge may have on downstream environments.

Response: Please see the second paragraph in the response to Comment 5.3 in the written comments section, which discusses the effluent limits for the interim treatment plant.

21.2 A commenter expressed concern over Impoundments 1 and 2 and stated that they are a major portion of what needs to be addressed. The commenter also stated that EPA does not have a plan for these two impoundments.

Response: As mentioned earlier, a separate focused feasibility study is being undertaken for Impoundments 1 and 2, given the characteristics of the waste in these impoundments. Once the study is completed, a remedy for Impoundments 1 and 2 will be proposed for public comment and subsequently selected. Also, see the response to Comment 15.2 in the written comments section, which discusses the status of Impoundments 1 and 2 and several of the interim measures taken to reduce the threats to human health and the environment until a long-term solution is developed and implemented.

21.3 A commenter stated that Alternative 4A is not enough.

Response: Please see the response to Comment 2.1 in the written comments section for a further discussion of why Alternative 4A was selected over other alternatives.

22.1 A commenter stated that there was not enough time for her to read something at the public meeting.

Response: As indicated in the press release, public notice, Proposed Plan and at the public meeting, in addition to accepting verbal comments on March 8, 2012 EPA also accepted written comments throughout the 90-day public comment period. Please see the response to Comment 20.4 in the verbal comments section for more information about the community’s opportunity to provide public comments.

ATTACHMENT A: PROPOSED PLAN

Superfund Program
Proposed Plan

U.S. Environmental Protection Agency
Region 2

American Cyanamid Superfund Site
Township of Bridgewater, New Jersey

February 2012

EPA ANNOUNCES PROPOSED PLAN

This Proposed Plan identifies the preferred alternative for addressing the site-wide soils, groundwater, and the impoundment contents that have not yet been remediated with the exception of Impoundment 1 and 2 at the American Cyanamid Superfund Site (Site) and provides the rationale for those preferences.

Out of the existing 27 impoundments identified at the Site, 16 were determined to be potentially contributing to groundwater contamination and, therefore, deemed necessary to be addressed under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, or Superfund). Excluding Impoundments 1 and 2, there are six impoundments remaining on the Site that have not yet been addressed under CERCLA. These six impoundments were evaluated in a Comprehensive Site-wide Feasibility Study along with site-related soil and groundwater. The impoundments have been found to be contaminated with mainly volatile organic compounds (VOCs), semi-VOCs, and metals. Groundwater underlying the Site and nearby areas, not currently used as a source of drinking water, is contaminated with metals and VOCs, such as benzene, chlorobenzene, ethylbenzene, and xylene as a result of previous Site activities. Site-wide soils mainly contain polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and chromium.

The U.S. Environmental Protection Agency (EPA) is proposing active measures to address the contaminated impoundments and site-wide soils as the preferred alternative, along with a groundwater recovery and restoration action. EPA is recommending Remedial Alternative 4A, identified as Consolidation/Treatment/ Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Groundwater.

This Proposed Plan summarizes the data and rationale considered in making this recommendation. This document is issued by EPA, the lead agency for Site activities. EPA, in consultation with the New Jersey Department of Environmental Protection (NJDEP), the support agency for Site activities, will select the remedy for the Site after reviewing and considering all information submitted during a 45-day public comment period. EPA, in consultation with NJDEP, may modify the preferred alternative or select another response action presented in this Proposed Plan based on new information or public comments. Therefore, the public is encouraged to review and comment on <u>all</u> the information presented in this Proposed Plan.

EPA is issuing this Proposed Plan as part of its community relations program under Section 117(a) of CERCLA. This Proposed Plan summarizes information that can be found in greater detail in several reports included in the Administrative Record.

MARK YOUR CALENDAR

PUBLIC COMMENT PERIOD:
February 16, 2012– March 31, 2012, U.S. EPA will accept written comments on the Proposed Plan during the public comment period.

PUBLIC MEETING:
March 8, 2012 at 7:00 P.M.
U.S. EPA will hold a public meeting to explain the Proposed Plan and all of the alternatives presented in the Feasibility Study. Oral and written comments will also be accepted at the meeting. The meeting will be held at the Somerset County Vocational and Technical High School, 14 Vogt Drive, Bridgewater, New Jersey.

For more information, see the Administrative Record at the following locations:

U.S. EPA Records Center, Region 2
290 Broadway, 18th Floor
New York, New York 10007-1866
(212)-637-4308
Hours: Monday-Friday, 9 AM to 5 PM

N.J. Department of Environmental Protection
401 East State Street, Trenton, New Jersey

Bridgewater Township Library
1 Vogt Drive, Bridgewater, New Jersey

SITE DESCRIPTION

The Site, located in the central portion of New Jersey, is within the southeastern section of Bridgewater Township, Somerset County. It is bounded by Main Street to the north, the Raritan River to the west and south, and Interstate 287 to the east, as shown on Figure 1.

The Site encompasses approximately 435 acres and was used for numerous chemical and pharmaceutical manufacturing operations during the past 80-plus years. The facility was originally built in 1915 as Calco Chemical Company to manufacture intermediate chemicals and dyes. The plant expanded over the following 60 years to become one of the nation's largest dye and organic chemical plants, resulting in the production of thousands of chemical products. The majority of the expansion at the plant occurred after American Cyanamid purchased the facility in 1929 and was driven by the large increase in demand for chemicals in the United States, particularly during and immediately after World War II. The large increase in manufacturing capacity during the period from 1930 through 1970 required more buildings, support services, and disposal capabilities. As a result of past activities at the facility, a number of waste storage and disposal areas, referred to as "impoundments," were constructed. In addition, the surrounding soils and groundwater were eventually impacted. Throughout its more than 75-year manufacturing history, numerous organic and inorganic chemical raw materials were used at the facility to produce products including rubber chemicals, pharmaceuticals, dyes, pigments, chemical intermediates, and petroleum-based products.

The Site is generally divided into two main portions. The Main Plant area refers to that portion of the Site property within a flood control dike, and the Flood Plain area refers to that portion outside the flood control dike. Approximately 50% of the Main Plant was used for production activities over the time the facility was active. Impoundments cover approximately 10 to 15% of the Main Plant area. The remaining 35 to 40% was used for storage of general equipment, raw material, and finished product, as well as incidental waste disposal. The majority of the Flood Plain, which consists of approximately 80% of this area, contains impoundments, while the remaining 20% continues to be virtually undisturbed. A map of the Site can be found in Figure 2.

The Hill Property, also considered a part of the Site, is 140 acres located in the northeastern portion of the Site. The Hill Property was separated from the former Main Plant area of the Site since it consisted of a research laboratory and administrative buildings. In December 1990 (amended March 1992), a Baseline Site-wide Endangerment Assessment (BEA) Report established that there are no current or future unacceptable risks to human health and the environment associated with the Hill Property. Based on this finding, no remedial action was required other than the implementation of a Classification Exception Area (CEA) and a Well Restriction Area (WRA) for the groundwater.

In June 1999, all manufacturing ceased at the Site. By the end of November 2000, almost all buildings on-site were demolished.

In December 1994, American Home Products Corporation purchased the American Cyanamid Company. In December 2002, American Home Products Corporation changed its name to Wyeth. In October 2009, Wyeth was purchased by Pfizer Inc. and became a wholly owned subsidiary of Pfizer. Title to the Site property is held by Wyeth Holdings Corporation (Wyeth).

SITE HISTORY

Preliminary investigations completed in 1981 verified that approximately one-half of the Site was utilized to support manufacturing, waste storage, or waste disposal activities, and that contaminated source areas were confined primarily to the main plant area and in the on-site waste storage areas (impoundments). Twenty-seven impoundments are believed to have been constructed for disposal purposes. Of the 27, 16 were identified to be CERCLA classified impoundments since they were used for storing by-products of rubber chemical production, dye production, and coal tar distillation, as well as for disposal of general plant waste and demolition debris. These impoundments were originally estimated to contain 877,000 tons of waste material. Hence, these impoundments, along with identified areas of contaminated soils, are the primary focus of current remedial activities. Both media have been found to be sources of groundwater contamination. On September 8, 1983, the site was placed on the National Priorities List (NPL).

The 16 impoundments being addressed under CERCLA have been identified using numbers, which include: Impoundments 1, 2, 3, 4, 5, 11, 13, 14, 15, 16, 17, 18, 19, 20, 24, and 26. More specifically, these sixteen CERCLA impoundments:

- were re-evaluated as part of the 2012 Comprehensive Site-wide Feasibility Study (Impoundments 3, 4, 5, 13, 17, and 24);
- are being re-evaluated as part of an ongoing Focused Feasibility Study due to their complexity, location, and volume (Impoundments 1 and 2);

- are currently undergoing remediation (Impoundments 15 and 16);
- were remediated in accordance with CERCLA closure plans (Impoundments 11, 14, 18, 19, 20, and 26).

Note: Impoundments 9, 10, and 12 were never used for waste disposal. Impoundment 21 was used to contain emergency fire water and Impoundments 22 and 23 were used to contain river silt from the facility's former river water settling operation. Lagoon 6 and Impoundments 8, 9A, and 25 were closed and classified as Treatment/Storage/Disposal (TSD) facilities pursuant to regulations issued under the Resource Conservation and Recovery Act (RCRA). Lagoon 7 is in the process of being closed in accordance with RCRA closure plans.

American Cyanamid entered into an Administrative Consent Order (ACO) with NJDEP (referred to as the 1988 NJDEP ACO) in May 1988 to address the sixteen impoundments, site-wide contaminated soils, and groundwater. In addition to the regulatory requirements established under the 1988 NJDEP ACO, a New Jersey Pollutant Discharge Elimination System/Discharge to Groundwater (NJPDES/DGW) permit was issued in 1987. This permit required American Cyanamid to conduct extensive groundwater monitoring on a quarterly basis and continue pumping bedrock production wells, at a minimum rate of 650,000 gallons per day. This action was designed to capture groundwater contamination within the Site boundaries.

In May 1994, American Cyanamid and NJDEP executed an ACO Amendment (1994 NJDEP ACO Amendment) which incorporated the existing groundwater pumping and monitoring requirements of the NJPDES/DGW permit and included additional groundwater monitoring requirements for the Impoundment 8 RCRA Facility.

Due to the complexity, size, and nature of contamination at the Site, all impacted and affected impoundments, site-wide soils and groundwater were originally separated into seven Operable Units (OUs). A summary of the specific OUs and their status are as follows:

<u>OU1 (Group I): Impoundments 11, 13, 19, and 24</u>

A Corrective Measures Study/Feasibility Study (CMS/FS) was completed for the Group I Impoundments in 1992 and the Record of Decision (ROD) was signed in September 1993. The remedies for Impoundments 11 and 19 were completed in November 1997 and November 1995, respectively. The remedial activities scheduled for Impoundments 13 and 24 were suspended in 2004 pending the completion of a remedy review report (Impoundment Remedy Appropriateness Evaluation, 2005) and a subsequent Comprehensive Site-wide Feasibility Study report (2012).

<u>OU2 (Group II): Impoundments 15, 16, 17, and 18</u>

The CMS/FS for Group II Impoundments was completed in Nov 1993 and the ROD was signed in July 1996. The remediation of Impoundment 18 was completed in April 1998 per the selected remedy. The remedy for Impoundments 15 and 16 was modified by NJDEP with an Explanation of Significant Differences (ESD) on November 30, 1998. The ESD selected an alternative remedy consisting of recycling of the material (iron oxide) within both Impoundments 15 and 16. The recycling started in the spring of 2000 and is ongoing with an expected completion in 20 years. The remedial activities for Impoundment 17 were suspended in 2004 pending the completion of a remedy review report (Impoundment Remedy Appropriateness Evaluation, 2005) and a subsequent Comprehensive Site-wide Feasibility Study report (2011).

<u>OU3 (Group III): Impoundments 1, 2, 3, 4, 5, 14, 20, 26</u>

The CMS/FS for Group III Impoundments was completed in November 1997. A ROD followed in September 1998. As part of the 1998 ROD, EPA designated Impoundment 8 as a Corrective Action Management Unit (CAMU) in accordance with RCRA regulations.

The remedial activities for Impoundments 1 and 2 were suspended in 2004 and are being re-evaluated as part of a separate Focused Feasibility Study (FFS) due to the nature of their contents and their complexity. Remediation of Impoundments 3, 4, and 5 was suspended in 2004 pending the completion of a remedy review report (Impoundment Remedy Appropriateness Evaluation, 2005) and a subsequent Comprehensive Site-wide Feasibility Study report (2011). Impoundments 14 and 20 were remediated under CERCLA per a 2007 ESD and completed in August 2010. Impoundment 26 was excavated, solidified with cement, placed in the Impoundment 8. Remediation of Impoundment 26 was completed under CERCLA in May 2002.

<u>OU4: Site Soils</u>

A 1992 Surface Soil Remedial/Removal Action Program was completed addressing areas of soil contamination that pose a potential risk to worker health and safety. The program included excavation and off-site disposal of PCB-contaminated soil, excavation and disposal of PAH-contaminated soil, capping of another PAH-contaminated area, as well as placement of a geotextile, soil, and vegetative cover over a chromium-contaminated area. This program, along with plans for an OU4 Surface Soils ROD, was suspended in 2004 and has been re-evaluated as part of the Comprehensive Site-wide Feasibility Study.

OU5: Site Groundwater

In accordance with the NJDEP ACO, a groundwater monitoring program was established and included site-wide groundwater pumping and monitoring. To control groundwater contamination related to the Site, Wyeth operates bedrock production wells with pumping at a minimum rate of 650,000 gallons per day and monitors groundwater quality on a semi-annual basis. The groundwater monitoring program was re-evaluated as part of the Comprehensive Site-wide Feasibility Study (2011). This program, including the frequency of groundwater monitoring events, will be reassessed throughout the remedy selection process with completion expected during site-wide Remedial Design activities.

OU6: Hill Property

In July 1996, a no further action with monitoring and institutional controls ROD was issued by NJDEP for this portion of the Site. As a result of the ROD and to maintain water use restrictions, NJDEP established a CEA/WRA for the Hill property, which was closed in June 2008 after residual groundwater contamination was recovered. The site-wide CEA/WRA is currently being developed with NJDEP. The Hill Property portion of the Site was deleted from the NPL on December 29, 1998. The Hill Property has been redeveloped for commercial use (i.e., retail stores, a professional baseball stadium, and a commuter/stadium parking lot).

OU7: Site-related Wetlands

A Baseline Ecological Risk Assessment (BERA) was completed in January 2005 and a Human Health Risk Assessment (HHRA) for the Flood Plain was completed in December 2006. Site-related wetlands were re-evaluated as part of site-wide soils in the Site-wide FS.

Non-CERCLA Impoundments (RCRA)

Lagoons 6 and 7 and Impoundments 8 and 9A are being addressed under RCRA. The Impoundment 8 Facility was developed into a RCRA Subtitle-C landfill in May 1991. The design included a triple liner, leachate detection and collection system and groundwater monitoring system. All of Lagoon 6 and approximately 95% of Lagoon 7 soils and silts have undergone remediation through excavation/solidification and were placed into Impoundment 8. Impoundment 8 accepts only site-related materials defined under RCRA Subtitle C landfill requirements. Impoundment 9A was closed in-place by installing a double synthetic liner capping system.

Comprehensive Site-wide Feasibility Study

In Spring 2004, Wyeth submitted several documents to EPA and NJDEP seeking a suspension of remedial design and remedial action work on the OU3 remedy and proposed to reassess the entire Site through a Comprehensive Site-wide Feasibility Study. In its proposal, Wyeth stated that the remedy selected for the OU3 impoundments could not be performed as intended based on technical infeasibility. The difficulties mentioned included the impracticability of containing air emissions within permissible levels, a schedule to complete was estimated at 15 to 20 years, and a major cost escalation of over 100% higher than the original estimate provided in the September 1998 ROD. Based on these issues and the belief that previous decisions may also benefit from a comprehensive review, Wyeth proposed to reassess the OU3 remedial action and the other ROD remedies; complete the remedial investigations/studies for site-wide soils, groundwater, and wetlands; and evaluate potential future-use plans for the Site. All phases were to be combined into a single comprehensive program.

Impoundment 1 and 2 Focused Feasibility Study

In 2009, both EPA and NJDEP agreed to separate Impoundments 1 and 2 from the Site-wide Feasibility Study and site-wide remedy decision. Due to the highly complex nature of the contaminants within Impoundments 1 and 2 and their location in the flood plain, a Focused Feasibility Study is currently being performed on these impoundments with its own specific remedy to follow.

Corrective Action on Groundwater Discharges

In Fall 2010, Wyeth performed a site-wide inspection of the facility to note any environmental-related concerns. As a result, Wyeth observed groundwater discharge (referred to as seeps) from the Site banks in the vicinity of Impoundments 1 and 2 into the Raritan River. After sampling was performed and laboratory analysis was completed in December 2010, it was determined that the seeps contained up to 20,000 parts per billion (ppb) of benzene.

In February 2011, EPA and Wyeth developed an Interim Mitigation System (IMS) plan to immediately address the seeps while a longer term solution could be discussed, planned, and implemented. The IMS plan required the installation of activated carbon-filled sand bags along the River at the seep discharge points. These carbon bags continue to remain in place until the completion of a longer term solution expected in Spring 2012.

As part of a more effective engineered solution to address the seeps, Wyeth signed an Administrative Order on Consent (AOC) with the EPA on July 19, 2011 to address the seeps adjacent to Impoundments 1 and 2. The AOC required Wyeth to design and construct a Groundwater Removal System to intercept and capture or otherwise prevent releases of groundwater originating from the Site into the Raritan River. Wyeth proposed the construction of an interception trench along the Site banks of the Raritan River in the vicinity of Impoundments 1 and 2. The water captured in the interceptor trench would be treated and then discharged to Cuckhold's Brook after treatment. Both EPA and NJDEP have agreed to this approach and it is currently underway.

SITE CHARACTERISTICS

The area surrounding the Site is an urban mixture of industrial and residential uses. The American Cyanamid Site is currently zoned for industrial use. The 435-acre Site is fenced and contains a large vacant factory-style building and a few small vacant buildings. The property is covered with a mixture of vegetation and asphalt patches. The surrounding community is serviced by a public water supply that is not connected with the contaminated groundwater beneath the Site.

Based on information provided in previous studies and reports, Site areas of concern include: impoundment contents, Main Plant soils, Flood Plain soils, and site-related groundwater.

Impoundment Contents

The locations of the impoundments are shown on Figure 2. Out of the 27 impoundments constructed for waste storage or disposal, 16 were determined to potentially contribute to groundwater contamination and threaten human health and the environment. For a more comprehensive description and the current status of the impoundments, see Tables 1A-1F. These 16 impoundments are discussed as follows.

Previously Remediated Impoundments

Numerous impoundments have been remediated or partially remediated. The total area remediated (Lagoons 6 and 7; Impoundments 8 and 9A; Impoundments 11, 14, 18, 19, 20, 25 and 26; and portions of Impoundments 1, 2, 4 and 5) is approximately 79.8 acres, with an approximate volume of 1,089,100 cubic yards (CY) of waste material addressed. Of this amount, approximately 50,000 CY consisted of the highly mobile and toxic material from Impoundments 1, 2, 4, and 5. This material, which was considered to meet the definition of principal threat wastes (as defined by EPA under CERCLA), was treated on-site through recycling as a fuel source (*i.e.* destruction). Table 1 also provides the areas and volumes remediated by impoundment.

Impoundments 15 and 16 are currently undergoing remediation albeit on a slower pace. The current ongoing remedy for these impoundments is considered appropriate and consists of recycling/reuse of iron oxide. This remedy also includes the recycling/reuse of iron oxide located in a nearby area, referred to the former drying bed area. Therefore, Impoundment 15, Impoundment 16, and the former drying bed area are not included as part of this site-wide remedy, with the exception of a small portion of the former drying bed area which contains a tarry waste.

Remaining Impoundments

The total area of the impoundments yet to be remediated (Impoundments 1, 2, 3, 4, 5, 13, 17 and 24) is approximately 27.7 acres, with an approximate volume of 387,700 CY. As previously stated, Table 1 shows the contaminants of concern (COCs) per impoundment. Impoundments 1 and 2 are being completed under a separate FFS and remedial action.

Based on historical analytical data and information provided in previous studies and reports, the waste material in the remaining impoundments will generally require some form of control to eliminate direct contact exposures and migration to groundwater. Two additional exposure routes, inhalation or ingestion of dust or vapors, and physical movement of the materials beyond their location and subsequent contact with receptors, must also be addressed.

Site Soils

The term "Site soils" constitutes media that do not include impoundment contents or groundwater. The estimated total area of impacted surface and subsurface soils being addressed is approximately 284 acres; 194 acres in the Main Plant and 90 acres in the Flood Plain, with a total volume of approximately 3,339,000 CY.

Main Plant Soils

Approximately 50% of the Main Plant area was used for active manufacturing and production operations. The remainder of the Main Plant was used for equipment and material storage, and waste disposal. As previously noted, soil impacts within the Main Plant are widespread and include VOCs, SVOCs, and inorganics with no discernable patterns or distinct areas of specific contamination.

Flood Plain Soils

Manufacturing activities were never conducted within the Flood Plain. Disposal of wastes was limited to the impoundments, namely Impoundments 1, 2, 13, 15, 16, 17, 18, 24 and the former drying bed area. Therefore, the impacted soils in the Flood Plain are likely the result of incidental contamination, and have no discernible or specific sources.

The recent suspected groundwater discharges observed during the 2010 field investigation activities are indicative of potential contamination in the flood plain from Impoundments 1 and 2. Flood Plain soils were evaluated during the BERA and HHRA. The adequacy of the Flood Plain data will be re-evaluated during the Remedial Design Phase.

<u>Groundwater</u>

Over the past 60 years, the Site originally withdrew water from the on-site bedrock production wells for use as non-contact cooling water in the production operations. In accordance with the 1982 and 1988 NJDEP ACOs (as amended in 1994), the current average withdrawal of over 650,000 gallons per day results in groundwater flow inward from the perimeter of the Site toward the pumping wells. This system contains the majority of the existing groundwater contamination within the Main Plant area of the Site. Recovered groundwater is discharged to the adjacent Somerset-Raritan Valley Sewerage Authority (SRVSA) wastewater facility for subsequent treatment and eventual release into Cuckhold's Brook.

Site groundwater quality is currently monitored as part of a semi-annual monitoring program. Historical data is generally clustered around the impoundments, because this is where much of the past work at the Site was focused. In November 2005, as part of the Groundwater Remedial Investigation (RI), a site-wide round of groundwater samples was collected with the objective of obtaining a site-wide understanding of groundwater quality conditions.

The contaminants found most frequently at concentrations above New Jersey Groundwater Quality Standards (GWQS) and Federal Maximum Contaminant Levels (MCLs) in the overburden aquifer are as follows:

- VOCs: benzene, chlorobenzene, toluene, and xylene
- SVOCs: aniline, 1,2-dichlorobenzene, and 1,4-dichlorobenzene

Overburden groundwater concentrations of VOCs and SVOCs are higher than those detected in bedrock groundwater. The contaminants found most frequently at concentrations above the groundwater standards in the bedrock aquifer are as follows:

- VOCs: benzene, chlorobenzene, toluene, xylene, 1,2-dichloroethane, carbon tetrachloride, trichloroethene, and tetrachloroethene
- SVOCs: 1,2-dichlorobenzene and 1,4-dichlorobenzene

In both the overburden and bedrock aquifers, inorganic contaminants found at concentrations above either the GWQS or MCLs included manganese, iron, and arsenic. Other inorganic contaminants were occasionally found above the standards, although these were typically at concentrations close to the GWQS.

Overburden groundwater migrates horizontally due to natural hydraulic gradients near Cuckhold's Brook and the Raritan River, as well as vertically due to induced hydraulic gradients from pumping of production wells. As noted above, pumping of the production wells hydraulically controls bedrock groundwater north of the Port Reading rail line. A groundwater elevation contour map for the overburden aquifer is shown in Figure 3. Bedrock groundwater present south of the Port Reading rail line is not hydraulically controlled by the pumping of the production wells and discharges to the Raritan River.

GEOLOGY AND HYDROGEOLOGY

<u>Geology</u>

The Site is situated in the New Jersey Piedmont geomorphologic province, which is an area of rolling, low-lying terrain interrupted only by the Watchung Mountains, about 1.5 miles to the north. Overall, the Site is generally flat, with a natural slope and direction of approximately 2% to the south-southeast toward the Raritan River. The following paragraphs discuss the generalized stratigraphy of the Site.

Surface geology

The natural soils of the Site are a mixture of sand, silt, and clay (loam). Man-made fill/general solid wastes and disturbed soil and gravel also exist at ground surface in portions of the Site.

Geology of unconsolidated deposits

The general area of and around the Bound Brook facility is covered by naturally occurring unconsolidated sediments ranging in thickness from 5 to 30 feet. These sediments are either the weathering product (residual soils) of the underlying bedrock, or they are fluvial deposits related to the adjacent Raritan River.

The unconsolidated deposits are composed of a silt and clay sequence, a sand and gravel sequence, and a weathered shale layer. The silt and clay sequence acts as a hydraulic barrier, which can prevent the migration of contaminated groundwater due to its low permeability. The sand and gravel sequence underlies the silt and clay sequence, but it also penetrates upwards into the silt and clay sequence in some locations. The weathered shale layer underlies the sand and gravel sequence. The weathered shale layer was created by weathering of bedrock and consists of shale and siltstone fragments in a clay matrix. This layer acts as a low permeability boundary between the overlying deposits and the underlying bedrock. When viewing the overburden deposits from a site-wide perspective, it can be seen that the entire sequence of overburden deposits (silt and clay, sand and gravel, and residual soil) tend to be present across the Site, although the silt and clay layer is not continuous across the Site.

Bedrock geology

The unconsolidated deposits are underlain by bedrock. This bedrock layer is part of the Passaic Formation, which consists of a series of reddish-brown shale, siltstone, and fine-grained sandstone units. The bedrock contains highly fractured zones which allow vertical groundwater flow. These bedrock fractures control the composition and distribution of the overlying water-bearing units and the groundwater flow regime in the overburden aquifer system.

Hydrogeology

A principal objective for understanding the Site hydrogeology is to understand the potential for movement of Site contaminants from source areas. The chemistry data and interpreted distribution of key marker compounds indicates that there are a few reasonably well-defined areas of contamination in overburden groundwater as opposed to one or more gradational plumes. This distribution is likely caused by the generally downward hydraulic gradients between the overburden and the bedrock which is significantly influenced by the bedrock pumping at wells PW-2/PW-3. The overall transport of overburden impacts is horizontal, likely within the sand and gravel unit at the base of the overburden, until a hydraulic connection is made between overburden and bedrock. Across most of the Main Plant Area, impacts are further transported in the bedrock co-located with structural bedding plans and migrate within the overall capture of the groundwater collection system.

INVESTIGATION SUMMARY

The impoundments and contaminated soils are the primary focus of current remedial activities since they have been found to be the contributing sources of groundwater contamination. An Impoundment Characterization Program was completed in 1990, which was intended to fulfill the requirements of an RI for the impoundments. A Soils RI was completed in May 1992 to characterize and delineate contaminated soils. Subsequent to the Impoundment Characterization Program, three CMS/FS reports were completed for the three impoundment groups between 1992 and 1997. RODs were issued for these impoundment groups consistent with the remedial alternatives recommended in the CMS/FS reports and remedial actions were completed in accordance with their respective RODs for Impoundments 11, 14 , 18, 19, 20, and 26.

Remedial activities were suspended in 2004 pending the completion of a remedy review report. The remedy review report, referred to as the Impoundment Remedy Appropriateness Evaluation, was completed in July 2005 and concluded that the conditions for Impoundments 1, 2, 3, 4, 5, 13, 17, and 24 had changed, in some cases significantly, since their respective RODs were issued.

In 2005, a Data Adequacy Review (DAR) was completed to assess the adequacy of existing soil and groundwater data assembled through previous investigatory and monitoring programs at the Site. The DAR Report concluded that there was sufficient existing data related to Site soils and impoundment materials, but additional groundwater investigation was necessary to adequately characterize groundwater for the evaluation of remedial alternatives. Following the completion of a Groundwater RI Report in February 2006, NJDEP requested that additional monitoring wells be installed and additional data be collected. A Supplemental Groundwater RI Report, which included this additional data, was approved by NJDEP in February 2008; therefore, it was concluded that sufficient groundwater data exists for the completion of the Comprehensive Site-wide FS.

On March 16, 2010, EPA presented the proposed alternatives of the Comprehensive Site-wide FS to EPA's National Remedy Review Board (NRRB) to evaluate the appropriate remedy for the remainder of the Site. As a result of this review, an additional alternative was developed in response to the NRRB's advisory recommendations. The preferred remedy presented in this Proposed Plan reflects this new alternative and NRRB input.

NATURE AND EXTENT OF CONTAMINATION

Impoundment Contents

Of the six impoundments discussed previously and being addressed in this Proposed Plan, there are two general types of impoundments being addressed:

- Those used to dispose mainly process wastes.
- Those used to dispose wastewater sludge.

Impoundments 3, 4, and 5 were used for mainly process waste disposal, and Impoundments 13, 17, and 24 were used for disposal of wastewater sludge. VOCs, which are relatively mobile in the environment and are present in the impoundments, have been found in both the overburden and bedrock groundwater aquifers.

Overburden groundwater at the Site naturally flows toward the Raritan River and its tributaries. Under current conditions this natural groundwater flow direction is maintained only for the southern and eastern portions of the overall Site area. Bedrock groundwater pumping has resulted in local areas on-site with lower water table surface elevations, referred to as depressions, which indicates that groundwater flows downward into the bedrock aquifer at some locations. Bedrock groundwater pumping has also resulted in areas with elevated water table levels, referred to as mounds, specifically located in the northern and southern parts of the Site. The water table mounding directly influences the overburden groundwater towards the depressions thereby extending the overall capture of overburden groundwater by the bedrock extraction wells (PW-2 and PW-3). In addition, previous and current data indicates that overburden groundwater continues to migrate into the bedrock over most of the Site. Although part of overburden groundwater is discharging to Cuckhold's Brook, the results of the Main Plant overburden groundwater investigation indicated no significant impacts. The groundwater in the Impoundment 1 and 2 area is currently being addressed as part of the Removal Action and a separate pre-design investigation is being performed.

In 1985, a report prepared by Camp Dresser & McKee (CDM) indicated that overburden groundwater may be drawn downward into the bedrock system by production well pumping. As confirmed by the Groundwater RI, this capture is strongest in the northern areas of the plant and weakens to the south. Any VOCs present in overburden groundwater in northern areas of the Site, therefore, tend to be captured by the pumping wells. The impoundments where the disposal of production wastes and wastewater treatment sludges took place can act as potential sources of contamination to groundwater.

In the areas south of the Main Plant, bedrock groundwater that is not captured by the pumping wells eventually discharges to the Raritan River. Bedrock groundwater in the areas of Impoundments 1 and 2, and Impoundments 17 and 24, (all of which are south or southwest of the Main Plant), is outside the zone of influence of the pumping wells. Contaminants present in the bedrock groundwater in these areas discharge to the river. Bedrock groundwater concentrations in these areas, however, are generally lower than those detected in overburden groundwater. The quality of the bedrock in this area and, groundwater discharges to the river from the bedrock aquifer are subject to ongoing evaluations.

VOCs contained in impoundments may be released to the atmosphere through volatilization from impoundment solids or impoundment water covers. As previously noted, the physical characteristics of the impoundments do not allow for the contents of these impoundments to be transported by surface water runoff, thus significant overland transport of the chemicals of interest with stormwater runoff does not occur.

Site Soils

In general, chemicals in the environment are likely to behave in rather specific ways. Chemicals such as PCBs or most heavy metals have an affinity to bind to material with high organic carbon content such as certain types of soil or sediment. Substances retained in soils are exposed to additional transport mechanisms. These include overland transport with stormwater runoff, atmospheric transport with dusts, biodegradation, and bioaccumulation in soil biota.

Other chemicals such as VOCs tend to either migrate towards groundwater or volatilize to the atmosphere.

Past leaks and spills have impacted soils generally in the production area of the Main Plant as well as soil areas in the western portion of the Site, also referred to as the West Yard. The environmental fate and transport of chemicals associated with the leaks and spills depends on the conditions described in the previous paragraphs. Chemicals in the Main Plant area reaching the overburden groundwater would be expected to migrate to pumping wells or, in those instances where groundwater is not controlled by the pumping wells, to the Raritan River. As noted in the Baseline Endangerment Assessment, 1992, contaminated soils may also serve as a source of contaminant movement into surface water and to the atmosphere. However, preliminary remediation activities have addressed the issue of soil contaminant migration in terms of erosion or volatilization processes and stormwater runoff.

Preliminary activities used to address these migration pathways were the addition of clean fill and gravel and paving some areas within the Main Plant. In addition, soil contamination is contained within the flood control berm surrounding the Main Plant area, generally preventing stormwater runoff from leaving the Main Plant area, as noted earlier. Runoff is collected and currently stored in Lagoon 7, thus preventing off-site migration of contaminants into surface waters by erosion and subsequent sedimentation processes. Chemical migration from both impoundments and soils to the groundwater is a primary transport mechanism at the Site. Dust generation, volatilization, and surface water runoff are considered secondary transport mechanisms at the Site.

Groundwater

Overburden groundwater with contaminant concentrations above the GWQS where discharge is not controlled by the current bedrock pumping system is found in the following areas:

- between Impoundments 1 and 2 and the Raritan River to the south and Cuckhold's Brook to the west;
- between Lagoon 7/Impoundment 24 and the Raritan River to the southwest;
- between Impoundment 24/Lagoon 6 and New Jersey American Water to the south;
- between Impoundments 3, 4, and 5 and Cuckhold's Brook to the southwest; and
- between the Main Plant and Cuckhold's Brook to the south.

Organic chemical contaminants detected above the GWQS are present in bedrock groundwater north of the rail line. Main Plant bedrock groundwater is captured by production wells PW-2 and PW-3 and, therefore, is controlled and limits migration off-site.

Bedrock groundwater present south of the rail line is not captured by pumping of the production wells. Based on a review of bedrock groundwater monitoring analytical data, and with an understanding of groundwater flow (i.e., as bedrock groundwater approaches the Raritan River, flow paths are upward), groundwater impacts are primarily evident downgradient of Impoundments 1 and 2.

The bedrock zone of capture is not consistently attained near the southwest corner of Lagoon 7 and Impoundment 24, and water quality results obtained from near the southwest corner of Impoundment 24 indicates concentrations of VOCs, SVOCs, and inorganics above water quality standards.

SCOPE AND ROLE OF ACTION

In order to remediate Superfund sites, work is often divided into OUs. The American Cyanamid site is divided up into eight OUs:

- OU1: Impoundments 11, 13, 19 and 24
- OU2: Impoundments 15, 16, 17 and 18
- OU3: Impoundments 1, 2, 3, 4, 5, 14, 20 and 26
- OU4: Site Soils
- OU5: Site Groundwater
- OU6: Hill Property
- OU7: Site-related Wetlands
- OU8: Impoundments 1 and 2

Note: The site-wide remedy presented in this Proposed Plan combines all previous OUs (OU1-OU7) and is being addressed under the existing OU4. As previously discussed, Impoundments 1 and 2 are being addressed separately and a new OU8 was recently created.

RODs have been signed for OU1 (9/28/93), OU2 (7/12/96), OU3 (9/28/98), and OU6 (7/12/96).

In June 2004, all ongoing remedial activities at the Site, with the exception of the groundwater capture system, were suspended pending the completion of a remedy review report to evaluate the appropriateness of the remaining impoundment remedial programs. Based upon this report, referred to as the 2005 Impoundment Remedy Appropriateness Evaluation, it was recommended that a Comprehensive Site-wide Feasibility Study be conducted.

Therefore, Wyeth undertook completion of a Comprehensive Site-wide Feasibility Study designed to address all remaining contamination within the various media on-site under a single comprehensive program. The final study would then be used for a site-wide ROD.

ENFORCEMENT

American Cyanamid entered into ACOs related to investigation and remediation at the Site with NJDEP in 1982 and 1988 to address the 16 impoundments, site-wide contaminated soils, and groundwater. The 1988 NJDEP ACO was amended in 1994 which incorporated the existing site-wide groundwater pumping and monitoring requirements of the NJPDES/DGW permit and included further groundwater monitoring requirements for the Impound 8 Facility.

In December 1994, American Home Products Corporation purchased the American Cyanamid Company and assumed full responsibility for environmental remediation as required under the NJDEP ACO for this Site. In December 2002, American Home Products Corporation changed its name to Wyeth. In October 2009, Wyeth was purchased by Pfizer Inc., and became a wholly owned subsidiary of Pfizer.

NJDEP was the lead agency for the Site until March 2009, when EPA assumed the lead role.

On July 19, 2011, Wyeth entered an Administrative Settlement Agreement and Order on Consent (EPA AOC) with EPA requiring Wyeth to design and construct a removal system engineered to intercept and capture contaminated groundwater in the overburden and prevent it from seeping into the Raritan River.

SUMMARY OF SITE RISKS

Baseline Risk Assessment

As part of the Site investigation process, a baseline risk assessment was conducted to determine the current and future effects of contaminants on human health and the environment.

A baseline risk assessment is an analysis of the potential adverse human health and ecological effects of releases of hazardous substances from a Site in the absence of any actions or controls to mitigate such releases, under current and future land, groundwater, surface water and sediment uses. It provides the basis for taking action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action.

Human Health Risk Assessment (HHRA)

The potential non-carcinogenic hazards and carcinogenic risks associated with potential exposures to the impoundments, surface soil, and groundwater were evaluated in the BEA (BB&L, 1992) for the Main Plant and the HHRA (O'Brien & Gere, 2006) for the Flood Plain. EPA Region 2 prepared a streamlined HHRA in February, 2010 which evaluated additional pathways.

The objective of the streamlined HHRA was to determine the cancer risks and non-cancer hazards associated with exposure to contaminated surface soil (main plant area), groundwater (overburden and bedrock) and the impoundments. Since the current zoning of the Site is industrial, the streamlined HHRA evaluated the following receptors: Site workers exposure to surface soil and the impoundments. The groundwater is a designated potable water supply; therefore, the residential exposure pathway was also evaluated.

The maximum detected concentrations in each medium were compared to their respective Regional Screening Level (RSLs). The surface soil RSLs are based on a

WHAT IS RISK AND HOW IS IT CALCULATED?

A Superfund baseline human health risk assessment is an analysis of the potential adverse health effects caused by hazardous substance releases from a site in the absence of any actions to control or mitigate these under current- and future-land uses. A four-step process is utilized for assessing site-related human health risks for reasonable maximum exposure scenarios.

Hazard Identification: In this step, the chemicals of potential concern (COPCs) at the site in various media (*i.e.*, soil, groundwater, surface water, and air) are identified based on such factors as toxicity, frequency of occurrence, and fate and transport of the contaminants in the environment, concentrations of the contaminants in specific media, mobility, persistence, and bioaccumulation.

Exposure Assessment: In this step, the different exposure pathways through which people might be exposed to the contaminants identified in the previous step are evaluated. Examples of exposure pathways include incidental ingestion of and dermal contact with contaminated soil and ingestion of and dermal contact with contaminated groundwater. Factors relating to the exposure assessment include, but are not limited to, the concentrations in specific media that people might be exposed to and the frequency and duration of that exposure. Using these factors, a "reasonable maximum exposure" scenario, which portrays the highest level of human exposure that could reasonably be expected to occur, is calculated.

Toxicity Assessment: In this step, the types of adverse health effects associated with chemical exposures, and the relationship between magnitude of exposure and severity of adverse effects are determined. Potential health effects are chemical-specific and may include the risk of developing cancer over a lifetime or other noncancer health hazards, such as changes in the normal functions of organs within the body (*e.g.*, changes in the effectiveness of the immune system). Some chemicals are capable of causing both cancer and noncancer health hazards.

Risk Characterization: This step summarizes and combines outputs of the exposure and toxicity assessments to provide a quantitative assessment of site risks for all COPCs. Exposures are evaluated based on the potential risk of developing cancer and the potential for noncancer health hazards. The likelihood of an individual developing cancer is expressed as a probability. For example, a 10^{-4} cancer risk means a "one in ten thousand excess cancer risk"; or one additional cancer may be seen in a population of 10,000 people as a result of exposure to site contaminants under the conditions identified in the Exposure Assessment. Current Superfund regulations for exposures identify the range for determining whether remedial action is necessary as an individual excess lifetime cancer risk of 10^{-4} to 10^{-6}, corresponding to a one in ten thousand to a one in a million excess cancer risk. For noncancer health effects, a "hazard index" (HI) is calculated. The key concept for a noncancer HI is that a "threshold" (measured as an HI of less than or equal to 1) exists below which noncancer health hazards are not expected to occur. The goal of protection is 10^{-6} for cancer risk and an HI of 1 for a noncancer health hazard. Chemicals that exceed a 10^{-4} cancer risk or an HI of 1 are typically those that will require remedial action at the site.

worker's direct exposure (via ingestion, inhalation, and dermal contact) while working at the Site (25 years). Since the groundwater at the Site is classified by NJDEP as a potable water supply, the RSLs represent a resident's exposure to groundwater contamination over a lifetime.

In general, the industrial worker's exposure to surface soil and the impoundments exceeded the acceptable risk range and the non-cancer hazard threshold of 1, and benzene, naphthalene, PCBs, arsenic, chromium, benzo(a)pyrene, and benzo(a)anthracene are the risk drivers. The trespasser's exposure to surface soil within the main plant area is at the upper bound of the acceptable risk range for chemicals in which cancer is the most sensitive health endpoint (attributable to benzo(a)anthracene and Total PCBs). However, the non-cancer threshold of 1 has been exceeded for several metals, notably cobalt, antimony, chromium, and lead detected in the surface soil. The cancer risks and non-cancer hazards associated with a resident's exposure to groundwater exceeded the acceptable risk range and the non-cancer threshold of 1, with thallium, manganese, cyanide, chlorobenzene, and 1,2-dichloroethane contributing most significantly to the non-cancer hazard. The risk drivers for a resident's exposure to groundwater are 1,4-dichlorobenzene, benzene, 1,2-dichloroethane, chloroform, 4-chloroaniline, aniline, bis(2-ethylhexyl)phthalate, and naphthalene. Receptors with reasonable maximum exposure (RME) cancer risk values above the acceptable risk range and receptors with non-cancer RME exposures greater than the non-cancer threshold of 1 are shown in Tables 13 and 14 of the Comprehensive Site-wide FS. It should be noted that other media (sediment and surface water) were not evaluated as part of this streamlined human health risk assessment, which could underestimate the cancer risks and non-cancer hazards. In regards to possible floodplain trespasser risks, an evaluation will be completed to determine if an additional risk assessment will be required during the Focused Feasibility Study for Impoundments 1 and 2. Overall, the streamlined risk assessment indicates that exposure to site-related contamination results in an excess lifetime cancer risk that exceeds EPA's target risk range of 10^{-4} to 10^{-6}, as well as NJDEP's acceptable cancer risk level of 10^{-6}. Therefore, site-related contamination poses an unacceptable human health risk to current and potential future receptors.

Ecological Risk Assessments

Ecological risks at the Site were addressed in two documents: the BEA approved by NJDEP and EPA in 1992, and the BERA in 2005. In the Qualitative Ecological Assessment section of the BEA, the results of a site-wide habitat survey, as well as evidence from direct field observations, were compared to the Natural Heritage Data Base (NJDEP, 1991). The assessment indicated that, with the exception of the great blue heron, the on-site habitat does not support threatened or endangered species. Impoundments 13, 17, and 24 were not included in either the 1992 BEA or the 2005 BERA because the contents of these impoundments were scheduled to be remediated under the OU1 and OU2 RODs.

The most significant potential exposure pathway identified in the BEA involves aquatic biota exposure to Raritan River water. Site groundwater discharge mass loading calculations suggest that exposure to concentrations of Site chemicals of interest resulting from groundwater discharge is unlikely to affect the health and diversity of aquatic biota in the Raritan River.

REMEDIAL ACTION OBJECTIVES

The following remedial action objectives (RAOs) address the human health risks and environmental concerns at the American Cyanamid Site. The RAOs are organized into three categories: principal threat waste, soil/impoundment material, and groundwater.

Principal Threat Waste:

- Remove or treat material that meets the definition of principal threat waste, to the extent practical, and
- Prevent current or potential future migration of material that meets the definition of principal threat waste from the Site that would result in direct contact or inhalation exposure, to the extent practicable.

Material that meets the definition of principal threat wastes exist at the Site that could pose potential risk of

WHAT IS A "PRINCIPAL THREAT"?

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes an expectation that EPA will use treatment to address the principal threats posed by a Site wherever practicable (NCP Section 300.430(a)(1)(iii)(A)). The "principal threat" concept is applied to the characterization of "source materials" at a Superfund Site. A source material is material that includes or contains hazardous substances, pollutants or contaminants that act as a reservoir for migration of contamination to ground water, surface water or air, or acts as a source for direct exposure. Contaminated ground water generally is not considered to be a source material; however, Non-Aqueous Phase Liquids (NAPLs) in ground water may be viewed as source material. Principal threat wastes are those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained, or would present a significant risk to human health or the environment should exposure occur. The decision to treat these wastes is made on a site-specific basis through a detailed analysis of the alternatives using the nine remedy selection criteria This analysis provides a basis for making a statutory finding that the remedy employs treatment as a principal element.

exposure if appropriate remedial actions are not implemented. Principal threat waste is material that includes or contains hazardous substances, pollutants, or contaminants that act as a reservoir for migration of contamination to groundwater, surface water, or air, or acts as a source for direct exposure. Without additional remedial action, there is the potential for these materials to migrate from their current locations to other on-site or off-site areas where unacceptable direct contact or air emission risks may result.

Soil/Impoundment Material:

- Prevent or minimize human and ecological exposure to contaminants in soils and impoundment materials at levels above relevant risk-based remediation criteria, and

- Prevent or minimize sources of groundwater impacts (*i.e.*, reduce chemical loadings to groundwater) resulting in long-term improvement of groundwater quality and eventual achievement of applicable regulatory standards.

Per the Site-wide FS and the HHRA, the soils and impoundments contain contaminants at concentrations in excess of regulatory criteria. The risk assessments (human health and ecological) concluded that in certain areas, exposure pathways (specifically direct contact and/or inhalation) between receptors and these contaminants are potentially complete and that the potential risks from exposure to these contaminants exceed acceptable levels. Outside of the Main Plant area, the risks are limited to isolated, relatively small areas.

Groundwater:

- Restore, as practicable, the overburden and bedrock aquifers within the area of attainment to its expected beneficial use and to concentrations below Federal MCLs and/or New Jersey GWQS within a reasonable period.

- Eliminate the migration of contaminants exceeding federal MCLs and/or NJ GWQS in the overburden and bedrock aquifers beyond the point of compliance through a combination of source actions and hydraulic controls to the extent practicable.

Groundwater at the Site contains contaminants at concentrations in excess of NJ GWQS. Although a groundwater collection system is in place that pumps on average about 20 million gallons per month, there is currently groundwater migrating from the Site. While it is not technically feasible to eliminate residual sources of groundwater impacts so as to allow for termination of hydraulic controls in the foreseeable future, source control and eventual restoration of groundwater quality are important objectives of this Proposed Plan.

Note: The area of attainment is defined by EPA Guidance: Guidance on Remedial Actions for Contaminated Groundwater at Superfund Sites (OSWER Directive 9283.1-2) as “the area of the plume outside the boundary of any waste to be managed in place as part of the final remedy, *i.e.*, the point of compliance, and inside the boundaries of the contaminant plume.” The point of compliance for the Site is defined as the edge of the waste management area in accordance with EPA Guidance: Summary of Key Existing EPA CERCLA Policies for Groundwater Restoration, June 26, 2009.

Remediation Goals

To meet the RAOs defined above, EPA has identified remediation goals to aid in defining the extent of contaminated media requiring remedial action. In general, remediation goals establish media-specific concentrations of Site contaminants that will pose no unacceptable risk to human health and the environment. Remediation goals have also been developed to establish criteria to define the source areas deemed principal threats for the Site, areas for which EPA has concluded treatment should be considered as part of the remedy.

In addition, to develop remedial alternatives for the Site, impacted media are characterized based on the actions required to minimize potential exposures to human and ecological receptors.

These potential exposures consist of:

- Direct contact with impacted media and their contaminants (referred to as “direct contact control”)

- Inhalation or ingestion of impacted media or their contaminants, including those that emit dust or vapors at unacceptable levels (referred to as “vapor control” [airborne contaminants])

- Physical movement of media beyond their containment areas that could result in contact by receptors (referred to as “movement control” or “migration control”).

Likewise, potential adverse ecological impacts resulting from the remedial alternatives need to be assessed. Based on the data collected to date, impoundment contents, soils, and groundwater will require some form of control to address the potential exposure pathways. Addressing these exposure routes by providing direct contact, vapor, and movement control, as appropriate, will result in applying different remedial approaches across the Site.

Below is a summary of the remediation goals for source areas; most notably the impoundments as well as some areas within the Main Plant soils, Flood Plain soils and groundwater established in the Site-wide FS.

Remediation goals for source areas, site-wide soils, and groundwater are presented in Tables 2A-2D.

Source Area Remediation Goals

Within the FS, the Source Area Remediation Goals are also referred to as areas requiring movement control and vapor control. Numerical criteria were developed to aid in defining the extent of contaminated media requiring movement control. The visual observation of tarry substances will also be utilized to identify areas requiring movement control, regardless of whether these tarry substances exceed the numerical criteria.

After reviewing the previous remedial investigations, 2006 Human Health Risk Assessment, and the Site-wide FS, EPA has identified that the sludges and tarry substances in Impoundments 3, 4 and 5 require a remedy for movement and vapor control. Additionally, some soils within the Main Plant, generally concentrated in the western portion of the Site, will also require movement control. A portion of the former drying bed was also identified as an area in the Flood Plain that would warrant movement control. Pre-design investigations will be conducted to confirm the identified areas and further delineate areas containing principal threat waste.

Site-wide Soil Remediation Goals

Within the FS, the Source Area Remediation Goals are also referred to as areas requiring direct contact and, in some select areas, vapor controls. Risk-based soil remediation goals were developed based on the potential exposure risks for ingestion, dermal contact, and inhalation human health exposure pathways. Industrial worker exposure was evaluated as a human health exposure pathway. Soil remediation goals were selected based upon consideration of these risk-based concentrations and promulgated NJDEP Non-Residential Direct Contact Soil Remediation Standards. NJDEP Impact-to-Groundwater Soil Screening Criteria were also evaluated as “To-Be-Considered” criteria.

Soils that exceed the soil remediation goal values, but do not constitute source areas, can generally be managed in place with engineering controls (capping) and proper land-use restrictions. As described earlier, soils/impoundment contents in the Main Plant area have concentrations that warrant the limiting of direct contact. This includes soils/impoundment contents in the entire Main Plant area, with the exception of soils underneath Impoundments 14, 21, and 26, which have either never been used for waste disposal or were previously remediated. Existing data also indicates that some form of direct contact control is warranted in portions of the Flood Plain area. This includes Impoundments 13, 17, and 24, but not the impoundments that were never used for waste disposal (9, 10, 12, 21, 22, 23), were previously remediated (11, 18, 19, and Lagoon 6), are in the process of being closed in accordance with RCRA closure plans (Lagoon 7), or are currently being remediated (15 and 16). Additionally, direct contact control is required for the former drying bed, as well as the isolated area located between Impoundment 13 and the railroad tracks that was identified as a potential risk in the HHRA and BERA. Regarding the Site soil areas requiring vapor control, there are locations within the Main Plant soils with contaminant concentrations exceeding screening criteria. Data for the Flood Plain area indicates that vapor control is only warranted in the tarry waste portion of the former drying bed area. These areas are identified on Figures 8-10 within the Comprehensive Site-wide FS for reference.

Groundwater Remediation Goals

Remediation goals were developed for groundwater based on the RAOs discussed earlier. The more stringent of the EPA federal MCLs, NJDEP groundwater quality criteria, NJDEP MCLs, and site-specific, risk-based concentrations was selected as the remediation goal. Consistent with the RAOs for groundwater, these remediation goals will be used for developing use restrictions and other actions to prevent exposure, and for assessing potential restoration and containment of the groundwater.

SUMMARY OF REMEDIAL ALTERNATIVES

Common Elements

Many of these alternatives include common components. Because any combination of remedial alternatives will result in some contaminants remaining on the Site above levels that would allow for unrestricted use, a review of the remedy will be conducted every five years, at minimum. In addition, institutional controls such as a deed notice or restrictive covenant would be required for the property as one component of maintaining the long-term protectiveness of the implemented remedy.

All the alternatives, with the exception of the no further action alternative, include soil capping and institutional controls to prevent exposure to low-level waste and residual concentrations of chemicals of concern.

A total of seven of the eleven original alternatives were carried through the screening process presented in the Comprehensive Site-wide FS. Please refer to Tables 24-33 of the Comprehensive Site-wide FS for a more detailed discussion of all the remedial alternatives.

Alternative 1 - No Action

Capital Cost:	$0
Annual O&M Costs:	$0
Total Present Worth:	$0
Implementation Timeframe:	Not Applicable

The NCP requires that a "No Action" alternative be developed as a baseline for comparing other remedial alternatives. Under this alternative, no action would be taken to remediate impacted soils and impoundment contents or groundwater at the Site. The current bedrock pumping system would be turned off. This alternative would only involve long-term monitoring of groundwater quality through a sampling program. Alternative 1 does not include institutional controls.

Alternative 2 – Limited Action

Capital Cost:	$683,283
Annual O&M Costs:	$32,399,257
Total Present Worth:	$33,082,537
<u>*Implementation Timeframe*</u>	
Soils/Impoundments:	*Not Applicable*
Groundwater:	*30 Years*

Under this alternative, implementation of institutional controls as described above would be implemented. Groundwater monitoring would continue to be performed as a basis for evaluating the CEA and well restriction area (WRA) and assessing the added value of the bedrock pumping system on impacted groundwater. Restrictions placed on the Site to limit its future use would be accomplished by recording in the property deeds that potentially hazardous media may be present and that use restrictions have been imposed. Should this alternative be implemented, the potential addition of monitoring wells to supplement the current monitoring scheme would be evaluated as part of the remedial action design development.

Alternative 3 – Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Groundwater

Capital Cost:	$87,976,060
Annual O&M Costs:	$49,973,383
Total Present Worth:	$137,949,443
<u>*Implementation Timeframe*</u>	
Soils/Impoundments:	*10 Years*
Groundwater:	*30 Years*

This alternative would provide a combination of containment caps over impacted areas at the Site to control the potential for exposure to impacted soils/impoundment contents.

<u>Main Plant Soils, Flood Plain Soils, and Impoundments</u>

For areas identified as requiring direct contact control, a 24-inch soil cover would be utilized to provide a barrier to prevent direct contact exposure with impacted media. This soil cover system would be an engineered cap designed and constructed to withstand the effects of up to a 500-year flood event. Appropriate controls and engineered mechanisms will be included to safe guard against scouring, erosion or other effects from being constructed in a floodplain. In addition, a strict inspection and maintenance program will be developed as part of the ongoing operation plan for the soil cover system.

For the material located in the flood plain (Impoundments 13, 17, and 24), an ecological risk assessment would be conducted during the remedial design phase to identify if any material requires relocation and consolidation in the Main Plant in areas requiring direct contact control.

For areas identified in the FS as requiring both vapor and movement control, a multi-layer engineered cap would be used. Measures would be employed in accordance with New Jersey requirements for vapor control as part of future construction. Where additional structural stability is needed to support a multi-layer cap (namely impoundment contents), stabilization, or a similar physical process as determined to be appropriate during the conceptual design phase, would be employed prior to capping. This is anticipated to consist of the use of standard construction technologies such as the addition of amendments, stabilizing agents, and/or the installation of physical structure (i.e., geogrids).

Groundwater

The groundwater component consists of collection of bedrock groundwater within the Main Plant. While the existing bedrock groundwater collection system provides hydraulic control over much of the Main Plant groundwater, the effectiveness of the bedrock groundwater collection system can be improved to better achieve the groundwater RAOs. Conceptual improvements to the bedrock collection system include placing the primary extraction well(s) in a more central location of the impacted bedrock and placing targeted bedrock groundwater extraction wells to address more localized impacts, such as in the vicinity of Lagoons 6 and 7/Impoundment 24. Additional details of these improvements would be developed during remedial design. This remedy also includes institutional controls that would prohibit potable use of groundwater at the Site.

Additionally, localized collection of overburden groundwater in specific areas would be included, as required, to prevent migration of contaminants not currently captured by the existing collection system. Possible areas where localized overburden groundwater collection could be placed are:

- between Impoundments 1 and 2 and the Raritan River to the south (if not addressed as part of the ongoing removal action)
- between Lagoon 7/Impoundment 24 and the Raritan River to the southwest, and extending around to the area between Impoundment 24/Lagoon 6 and NJ American Water Company to the south
- between the Main Plant and Cuckhold's Brook to the south and extending around to the southwest.

Based on the information presented in the groundwater RI Report and Supplemental RI Report, the following presents the proposed collection component for these areas:

- Recovery system (trenches, wells, and/or containment walls) around Impoundments 1 and 2 and between these impoundments and the Raritan River.
- Recovery system (trenches, wells, and/or containment walls) to collect impacted overburden groundwater along the north side of the Main Plant flood berm, north of Cuckhold's Brook and the rail line.
- Recovery system (trenches, wells, and/or containment walls) trench between Lagoon 7/Impoundment 24 and the Raritan River to the southwest, and extending around to the area between Impoundment 24/Lagoon 6 and New Jersey American Water to the south.
- Bedrock pumping well or a series of wells in the Lagoon 7 Area to capture bedrock groundwater not currently collected by the existing bedrock pumping system.

The waters collected at the Site will be appropriately treated or pre-treated, as necessary, for subsequent discharge in accordance with appropriate requirements. Treatment may occur on the combined waste stream or on individual streams as determined to be necessary. At this time, it is anticipated that discharge would be either to SRVSA, directly or following pre-treatment, or directly to surface water following on-site complete treatment.

Alternative 4 – Consolidation/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Groundwater

Capital Cost:	*$129,530,494*
Annual O&M Costs:	*$ 49,973,383*
Total Present Worth:	*$179,503,877*
Implementation Timeframe	
Soils/Impoundments:	*10 Years*
Groundwater:	*30 Years*

This alternative would provide a combination of caps over impacted areas at the Site to control the potential for direct contact with impacted soils/impoundment contents with the addition of excavation of the Flood Plain areas and consolidation in the Main Plant.

Main Plant Soils, Impoundments 3, 4, and 5
Includes same remedies as Alternative 3 with the exception of the Flood Plain area.

Flood Plain Soils and Drying Bed Area
The areas identified in the FS requiring direct contact, movement, and vapor control would be excavated and consolidated at the Main Plant in areas where the same types of controls are warranted.

Impoundments 13, 17 and 24
For the material in Impoundments 13, 17, and 24, an ecological risk assessment would be conducted during the remedial design phase to identify if any material requires relocation and consolidation in the Main Plant in areas requiring direct contact control.

Groundwater
Includes the same groundwater remedy as described in Alternative 3.

Alternative 4A – Consolidation/Treatment/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Ground Water

Capital Cost:	*$154,224,898*
Annual O&M Costs:	*$49,973,383*
Total Present Worth:	*$204,198,282*
Implementation Timeframe	
Soils/Impoundments:	*10 Years*
Groundwater:	*30 Years*

This alternative would provide a combination of caps over impacted areas at the Site to control the potential for direct contact with impacted soils/impoundment contents, which is one of the primary RAOs for the Site, with the addition of excavation of the Flood Plain areas and consolidation in the Main Plant. In addition, this alternative would address principal threat wastes found in the Main Plant areas and Impoundments 3, 4, and 5 by consolidating them in Impoundments 3, 4, and 5 and treating these materials before solidification and capping, thereby also addressing the RAOs. See Figure 4 for details on this alternative.

Main Plant Soils, Impoundments 3, 4, and 5
Includes same remedies as Alternatives 3 and 4 with the exception of the Flood Plain area and treatment of principal threat wastes.

For impoundment areas meeting the definition of Principal Threat Wastes, (namely, the contents of Impoundments 3, 4 and 5), *in-situ* solidification/stabilization (S/S), or a similar physical process, as determined to be appropriate during the conceptual design phase, would be employed for the full depth of the impoundment material prior to capping (the actual depth of treatment will be established and confirmed during the remedial design phase).

For Main Plant soils outside of the impoundment limits that meet the definition of Principal Threat Wastes, the material would be excavated to its full depth (confirmed in the remedial design phase) and consolidated within Impoundments 3, 4, and 5 for subsequent treatment with those wastes. These excavated areas outside Impoundments 3, 4, and 5 would then be backfilled and covered with the multi-layer engineered cap discussed above.

Flood Plain Soils and Drying Bed Area
The areas identified in the FS requiring direct contact, movement, and vapor control would be excavated and consolidated at the Main Plant in areas where the same types of controls are warranted.

Impoundments 13, 17 and 24
For the material in Impoundments 13, 17, and 24, an ecological risk assessment would be conducted during the remedial design phase to identify if any material requires relocation and consolidation in the Main Plant in areas requiring direct contact control.

An evaluation would be conducted during the remedial design phase to identify those soils that could potentially meet the definition of Principal Threat Wastes. This evaluation would consist of first identifying areas where constituent concentrations, based on existing data, are above those presented within EPA's Soil Screening Guidance, when adjusted to 1 x 10^{-3} risk (future Site user). Following this, field investigations (*e.g.*, air sampling) would be conducted to verify the potential air risks. Those areas subsequently identified as potential Principal Threat Wastes (*i.e.*, presenting a 1 x 10^{-3} risk based on measured concentrations in the breathing zone) would be excavated and consolidated in the Impoundments 3, 4 and 5 area for subsequent treatment with those materials (see below). Excavation extent and depth would be determined based on sampling data in the breathing zone. These excavated areas outside Impoundments 3, 4 and 5 would then be backfilled and covered with the multi-layer engineered cap discussed above. Additionally, any future structures constructed within areas requiring vapor control at the Site would include a vapor mitigation system, as required.

Groundwater
Includes the same groundwater remedy as Alternative 3.

Alternative 5 - Consolidation/Capping and In-Situ S/S with Hydraulic Control/Treatment of Groundwater

Capital Cost:	$257,918,074
Annual O&M Costs:	$49,973,383
Total Present Worth:	$307,891,457
Implementation Timeframe	
Soils/Impoundments:	*20 Years*
Groundwater:	*30 Years*

This alternative would consist of a combination of technologies to address soils/impoundment contents.

Main Plant Soils, Impoundments 3, 4, and 5
In the areas identified in the FS requiring direct contact control, a 24-inch soil cover would be utilized to provide a barrier to prevent direct contact exposure with impacted media. This soil cover system would be an engineered cap designed and constructed to withstand the effects of up to a 500-year flood event. Appropriate controls and engineered mechanisms will be included to safe guard against scouring, erosion or other effects from being constructed in a floodplain. In addition, a strict inspection and maintenance program will be developed as part of the ongoing operation plan for the soil cover system.

Impoundments 3, 4, and 5 and a few areas located in the Main Plant area have been identified as requiring vapor and movement controls. These impoundments/areas would utilize *in-situ* S/S as a means to reduce contaminant mobility. During S/S activities, emissions would be collected and treated to the extent practicable.

Flood Plain Area (including soils, Impoundments 13, 17 and 24, and drying bed area)
The areas identified in the FS requiring direct contact control would be excavated and consolidated at the Main Plant.

Groundwater
Includes the same groundwater remedy as Alternative 3.

Alternative 7 - Consolidation/Capping and Ex-Situ Low Temperature Thermal Desorption (LTTD) and S/S with Hydraulic Control/Treatment of Groundwater

Capital Costs:	$774,315,057
Total Estimated O&M Costs:	$ 49,973,383
Total Present Worth:	$824,288,040
Implementation Timeframe	
Soils/Impoundments:	*> 25 Years*
Groundwater:	*30 Years*

This alternative would consist of a combination of technologies to address soils/impoundment contents.

Main Plant Soils, Impoundments 3, 4, and 5
In the areas identified in the FS requiring direct contact control, a 24-inch soil cover would be utilized to provide a barrier to prevent direct contact exposure with impacted media. This soil cover system would be an engineered cap designed and constructed to withstand the effects of up to a 500-year flood event. Appropriate controls and engineered mechanisms will be included to safe guard against scouring, erosion or other effects from being constructed in a floodplain. In addition, a strict inspection and maintenance program will be developed as part of the ongoing operation plan for the soil cover system.

Main Plant Soils, Impoundments 3, 4, 5, 13, 17 and 24, and drying bed area)
In the areas identified in the FS requiring vapor and movement controls, soils/impoundment contents would be excavated and transported to a central area at the Main Plant for consolidation and staging. *Ex-situ* treatment would then be applied on-site, via LTTD and S/S. LTTD is designed to reduce concentrations of organics and other constituents that can be volatilized. S/S would be used to provide appropriate geotechnical properties for backfilling treated materials as well as having the potential added benefit of reducing the mobility of the remaining constituents.

Treated Materials:
Vapor Control: treated materials would be backfilled at the Main Plant
Movement Control: treated materials would be placed in the on-site RCRA facility, Impound 8. During S/S activities, emissions would be collected and treated, as practicable.

Flood Plain Area (including soils, Impoundments 13, 17 and 24, and drying bed area)
The areas identified in the FS requiring direct contact control would be excavated and consolidated at the Main Plant.

Groundwater
Includes the same groundwater remedy as Alternative 3.

Alternative 11 – On-Site/Off-Site Treatment with Hydraulic Control/Treatment of Groundwater

Capital Costs	$ 1,750,292,506
Total Estimated O&M Costs	$ 49,973,383
Total Present Cost	$ 1,800,265,890
Implementation Timeframe	
Soils/Impoundments:	*> 25 Years*
Groundwater:	*30 Years*

This alternative would consist of a combination of technologies to address soils/impoundment contents.

The main plant soils, flood plain soils, and all impoundment contents would be excavated and consolidated/staged at the Main Plant. *Ex-situ* treatment would then be applied on-site, via LTTD and S/S. Treated materials from areas at the Main Plant and Flood Plain where only direct contact control is warranted would be backfilled at the Main Plant, while treated materials from areas warranting vapor control would be placed in the on-site RCRA facility, Impoundment 8.

For areas identified in the FS requiring movement control, soils/impoundment contents would be excavated and transported to either an off-site incineration or recycling facility for treatment or beneficial re-use. During S/S activities, emissions would be collected and treated, as practicable.

Groundwater
Includes the same groundwater remedy as Alternative 3

EVALUATION OF ALTERNATIVES

Nine criteria are used to evaluate the different remediation alternatives individually and against each other in order to select a remedy, (see table below, Evaluation Criteria for Superfund Remedial Alternatives). This section of the Proposed Plan describes the relative performance of each alternative against the nine criteria, noting how each compares to the other options under consideration. A Detailed Analysis of Alternatives can be found in the FS Report.

1. Overall Protection of Human Health & the Environment

Alternative 1 is used as a baseline for comparison of the alternatives and is designed to represent baseline conditions at the Site and would not meet the RAOs established for the Site. Alternative 2, by comparison, would be protective of human health and the environment for groundwater currently captured by the existing groundwater control system and SRVSA treatment, and would employ access restrictions and institutional controls to address potential exposures to other media and transport mechanisms, but would not meet RAOs for principal threat wastes and groundwater outside the current capture zone. Alternatives 3, 4, 4A, 5, and 7 include capping of material requiring direct contact control and groundwater collection/treatment, and, therefore, would be protective of human health and the environment. Alternatives 3 and 4 include capping of materials requiring vapor and movement control, which would prevent exposure to impacted materials. Alternative 4A would also prevent exposure to impacted materials through capping, as well as treatment for the most-highly mobile materials, which would reduce toxicity and mobility of contaminants. Alternatives 3, 4, 4A, 5, 7, and 11 each meet the RAOs for principal threat wastes. However, alternatives 3 and 4 accomplish this primarily through containment while 4A, 5, 7, and 11, accomplish this primarily through treatment. Alternatives 5 and 7 include treatment of vapor and movement control material in both the Main Plant and Flood Plain as an element of protection of human health and the environment; however, their treatment components are not proven for all Site contaminants and RAOs may not be met for these contaminants. Alternative 11 removes the material requiring movement control from both the Main Plant and Flood Plain for off-site treatment/disposal, while treating direct contact and vapor control material on-site which would be protective of human health and the environment. However, capping, groundwater control and treatment-based remedy components essentially provide equivalent protection of human health and the environment by eliminating potential exposure pathways.

2. Compliance with ARARs

Applicable or Relevant and Appropriate Requirements (ARARs) would not be met for Alternative 1. ARARs would not be met for groundwater outside the current capture zone of the existing groundwater collection system or for soils/impoundments for Alternative 2. ARARs would generally be met for the remaining alternatives. However, more significant issues would be associated with location- and action-specific ARARs (e.g., stream encroachment, wetlands, flood hazard, etc.) in the Flood Plain for Alternatives 4, 4A, 5, 7, and 11; chemical-

EVALUATION CRITERIA FOR SUPERFUND REMEDIAL ALTERNATIVES
Overall Protectiveness of Human Health and the Environment evaluates whether and how an alternative eliminates, reduces, or controls threats to public health and the environment through institutional controls, engineering controls, or treatment.
Compliance with ARARs evaluates whether the alternative meets federal and state environmental statutes, regulations, and other requirements that are legally applicable, or relevant and appropriate to the site, or whether a waiver is justified.
Long-term Effectiveness and Permanence considers the ability of an alternative to maintain protection of human health and the environment over time.
Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.
Short-term Effectiveness considers the length of time needed to implement an alternative and the risks the alternative poses to workers, the community, and the environment during implementation.
Implementability considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.
Cost includes estimated capital and annual operations and maintenance costs, as well as present worth cost. Present worth cost is the total cost of an alternative over time in terms of today's dollar value. Cost estimates are expected to be accurate within a range of +50 to -30 percent.
State/Support Agency Acceptance considers whether the State agrees with the EPA's analyses and recommendations, as described in the RI/FS and Proposed Plan.
Community Acceptance considers whether the local community agrees with EPA's analyses and preferred alternative. Comments received on the Proposed Plan are an important indicator of community acceptance.

and action-specific ARARs associated with NJ Air Pollution Control Regulations may not be met for Alternatives 5, 7, and 11; and Alternative 7 would not meet the chemical-specific ARARs associated with the Treatment Objectives established in the Group III ROD/CAMU and LDRs.

3. Long-Term Effectiveness and Permanence

Long-term effectiveness and permanence do not apply to the baseline conditions represented by Alternative 1. By comparison, Alternative 2 would provide an effective long-term remediation for groundwater within the current capture zone of the existing bedrock groundwater pumping system, but would not specifically address other media or groundwater outside the current capture zone. The groundwater remedy components for Alternatives 3, 4, 4A, 5, 7 and 11 provide similar effectiveness of groundwater control over the long-term, and remedies that would be functionally permanent with proper maintenance. Capping of material requiring direct contact control associated with Alternatives 3, 4, 4A, 5, and 7 would be effective over the long-term in controlling potential direct contact exposure. A cap is functionally permanent with proper maintenance. Alternatives 3, 4, 4A, 5, 7, and 11 would result in making the Site available for beneficial community reuse, although the time required to achieve this would be longer for Alternatives 5, 7, and 11, compared to Alternatives 3, 4, and 4A. Alternatives 4 and 4A also utilize treatment of material and/or consolidation which would provide additional permanence over Alternative 3. Treatment associated with Alternatives 5, 7, and 11 has not demonstrated effectiveness for the full range of contaminants, which would likely prolong schedules and increase time before RAOs would be obtained, if they would be attained at all.

4. Reduction in Mobility, Toxicity or Volume through Treatment

Alternative 1 would provide no reduction in mobility, toxicity or volume. For Alternative 2 mobility, toxicity and volume of contaminants in groundwater within the capture zone of the existing groundwater collection system would be reduced, but not reduced outside the existing capture zone, or in other media. Groundwater collection and treatment associated with the remaining alternatives (3, 4, 4A, 5, 7, and 11) would control mobility of contaminants through capture, would reduce the volume and toxicity of contaminants through treatment and would be permanent. Capping associated with Alternatives 3, 4, and 4A would reduce mobility via control of vapor, movement and infiltration. *In-situ* S/S associated with Alternatives 3 and 4 would reduce contaminant mass through media transfer and mobility through binding the treated mass and limiting infiltration. LTTD and S/S associated with Alternatives 4A, 5, 7, and 11 would reduce contaminant mass through the treatment and capture of contaminants; however, S/S associated with Alternatives 4A, 5, 7, and 11 would increase the total volume of material.

5. Short-Term Effectiveness

No short-term effects would be anticipated with implementation of Alternatives 1 or 2, and the implementation timeframes for both would be immediate. The duration of implementation for Alternatives 3, 4, and 4A would be relatively short. The implementation duration for Alternatives 5, 7, and 11 would be relatively long (over 20 years). Implementation of the remedial actions associated with Alternative 3 would be minimally disruptive, resulting in minimal short-term impacts and would be limited in wetland, ecological habitat and flood plain areas. Implementation impacts would occur in wetlands, ecological habitat and floodplain with implementation of Alternatives 4 and 4A; however, enhancement of existing, non-impacted wetlands and habitats and/or creation of new wetlands/habitats would be employed to mitigate impacts. Implementation of excavation, consolidation, and treatment activities associated with Alternatives 5, 7, and 11 would result in large-scale intrusions and material disturbances, increasing the opportunity for emission generation and material release to the environment with commensurate complexity in implementation of effective controls. Additionally, such large-scale intrusions as associated with Alternatives 5, 7, and 11 would result in destruction of existing wetlands and habitats; and, temporary, but detrimental, disruption of habitat and flora/fauna communities would occur in surrounding areas during implementation; however, enhancement of existing, non-impacted wetlands and habitats and/or creation of new wetlands/habitats would be employed to mitigate impacts.

Increases in truck traffic through the local community would occur during construction of Alternatives 3, 4, 4A, 5, 7, and 11. However, trucks would be carrying only S/S admixtures, clean fill and construction materials with implementation of Alternatives 3, 4, 4A, 5, and 7, while trucks would be carrying the most highly contaminated material from the Site to off-site treatment/disposal sites with implementation of Alternative 11. The potential for exposure to workers during construction for Alternative 3 would be minimal due to the minimally invasive nature of the construction. However, worker exposures would be increased with implementation of Alternatives 4, 4A, 5, 7, and 11, due to the increase in generation of air emissions related to excavation, consolidation and treatment.

6. Implementability

A review of the implementability of Alternatives 1 and 2 is not applicable since either no action is taken or the actions are largely already complete. Equipment, materials and personnel necessary to implement Alternatives 3, 4, 4A, 5, 7, and 11 are typically available in the marketplace; however, qualified contractors that would implement the types of remedial projects associated with Alternatives 5, 7, and 11 may not be available or accessible for the entire duration of construction due to their relatively long implementation timeframes. Additionally, the treatment components of Alternatives 5, 7, and 11 for the Site material are unproven.

Capping and groundwater collection/treatment associated with Alternatives 3, 4, 4A, 5, and 7 are proven, reliable technologies and would be readily constructed and maintained. Stabilization associated with Alternatives 3, 4, and 4A utilize proven geotechnical technologies; however, variability of materials on-site could require additional treatment and affect intermediate milestones in a construction schedule. Alternatives 3, 4, and 4A rely mainly on capping; however, Alternative 4A provides more protection through relocation of the Impoundment material in the floodplain to the Main Plant. Alternative 4A offers additional protection by also excavating materials which could meet the definition of principal threat waste with subsequent consolidation and treatment of material (*In-situ* S/S). *In-situ* S/S associated with Alternative 5 may prove difficult due to locations, nature of material and surroundings (*i.e.*, flood plain, wetlands, etc.). Monitoring for Alternatives 2, 3, 4, 4A, 5, 7 and 11 would be effective in identifying successful operation of the remedy. Although proven technologies, due to the range of contaminants to be addressed, extensive pre-design testing would be required for the treatment technologies employed with Alternatives 5, 7, and 11.

The excavation of material proposed in Alternatives 4, 4A, 5, 7, and 11 would trigger LDRs consequently, CAMU requirements would apply. The remaining capacity in Impoundment 8 may not be sufficient to receive treated material volumes resulting from implementation of Alternatives 7 or 11. Invasive construction activities in the regulated flood plain may increase the time required prior to initiation of the remedies employed by Alternatives 4, 4A, 5, 7, and 11. Regulatory review and approvals would be required from local, state and federal agencies; these would be of a standard, routine nature for Alternatives 3, 4, and 4A but would be more extensive for Alternatives 5, 7, and 11. Failures/iterations relative to S/S and LTTD associated with Alternatives 5, 7, and 11 could cause construction delays and may result in ARARs not being attained. Alternatives 3, 4, and 4A have the ability to implement additional remedial actions if necessary. However, following S/S associated with Alternatives 5, 7, and 11, any additional manipulation of material would be more difficult.

7. Costs

The estimated capital cost, O & M, and present worth cost are discussed in detail in the Feasibility Study. The cost estimates are based on the best available information. Alternatives 1 ($574,000) and 2 ($33.1 M), No Action and Limited Action, respectively, would incur the least cost to implement. Alternative 3 would cost $138 million. Alternative 4 ($180 M) would cost 30% more than Alternative 3. Alternative 4A ($205 M) would cost 49% more than Alternative 3 and 14% more than Alternative 4. Alternatives 5 ($308 M) and 7 ($825 M) are significantly more costly, at more than two and almost six times more costly than Alternative 3, respectively. Alternative 11 ($1.8 B) would be the most costly, at more than twice the cost of the next most costly (Alternative 7), and would be at least an order of magnitude higher in cost than other alternatives that meet the RAOs.

8. State/Support Agency Acceptance

The State of New Jersey concurs with EPA's preferred alternative as presented in this Proposed Plan.

9. Community Acceptance

Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision, the document that formalizes the selection of the remedy for the Site.

PREFERRED ALTERNATIVE

Based upon an evaluation of the remedial alternatives, EPA recommends Alternative 4A as the Preferred Alternative. Alternative 4A has the following key components: Consolidation/Treatment/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Ground Water.

Alternative 4A is both a treatment- and a containment-based alternative consisting of proven technologies that would be effective in controlling and reducing the risks associated with the exposure pathways identified at the Site. The use of engineered capping systems would effectively control direct contact (soil cover in Main Plant and excavation and relocation of Flood Plain material to the Main Plant) and minimize the release of contaminants into the air (multi-layer cap for vapor control in Main Plant and Flood Plain). Additionally, excavating the materials in the Flood Plain warranting movement control, and consolidating them at the Main Plant for *in-situ* S/S, as necessary, and multi-layer capping would address movement beyond those containment areas. *In-situ* S/S would reduce contaminant mass through media transfer (enhanced desorption), capture of the emissions, and destruction in a vapor treatment system. *In-situ* S/S would also serve to reduce mobility of contaminants through the binding of treated mass and the limiting of infiltration through the less permeable, treated waste material.

Although excavation of materials from the Flood Plain would remove the potential risks associated with the potential exposure pathways in those areas, there would be risks associated with excavation activities. These could include air emission and dust generation, damage to existing ecological systems, worker safety, and control of construction activities (*i.e.* erosion, materials storage, etc.) within a floodplain.

Hydraulic controls provided by improved collection/treatment of bedrock and overburden groundwater coupled with institutional controls that prohibit potable use of on-site groundwater would achieve the groundwater RAOs and would provide for protection of human health and the environment. The continued use of the groundwater extraction and treatment system, supplemented by additional measures to contain, and collect overburden groundwater in select areas, would provide for protection of human health and the environment by containing impacted groundwater.

This alternative would be readily implementable using conventional technologies, would be potentially cost effective, and would return the Site to beneficial reuse as soon as practicable with an estimated implementation timeframe of approximately 10 years for impoundments and soils and approximately 30 years for groundwater..

Excavating the impoundments in the Flood Plain and consolidation of the material on the Main Plant with placement of a soil cover will prevent direct contact exposure and the placement of a multi-layered engineered cap where required will provide vapor and movement control. The remedy would also be effective in reducing the risk of impoundments in the flood plain being compromised by any flooding.

The Preferred Alternative is believed to provide the best balance of tradeoffs among the alternatives based on the information available to EPA at this time. EPA believes that the Preferred Alternative would be protective of human health and the environment, would comply with ARARs, would be cost-effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. The preferred alternative can change in response to public comment or new information.

COMMUNITY PARTICIPATION

EPA encourages the public to gain a more comprehensive understanding of the Site and the Superfund activities that have been conducted there.

The dates for the public comment period, the date, location and time of the public meeting, and the locations of the Administrative Record files, are provided on the front page of this Proposed Plan. Written comments on the Proposed Plan should be addressed to one of the Remedial Project Managers listed on the right.

EPA Region 2 has designated a public liaison as a point-of-contact for the community concerns and questions about the federal Superfund program in New York, New Jersey, Puerto Rico, and the U.S. Virgin Islands. To support this effort, the Agency has established a 24-hour, toll-free number that the public can call to request information, express their concerns, or register complaints about Superfund.

For further information on the American Cyanamid Superfund Site, please contact:

Joseph Battipaglia	Cecilia Echols
Remedial Project Manager	Community Involvement Coordinator
(212) 637-4384	(212) 637-3678
battipaglia.joseph@epa.gov	echols.cecilia@epa.gov

Written comments on this Proposed Plan should be mailed to Mr. Battipaglia at the address below or sent via email.

U.S. EPA
290 Broadway, 19th Floor
New York, New York 10007-1866

The public liaison for EPA's Region 2 is:

George H. Zachos
Regional Public Liaison
Toll-free (888) 283-7626
(732) 321-6621

U.S. EPA Region 2
2890 Woodbridge Avenue, MS-211
Edison, New Jersey 08837-3679

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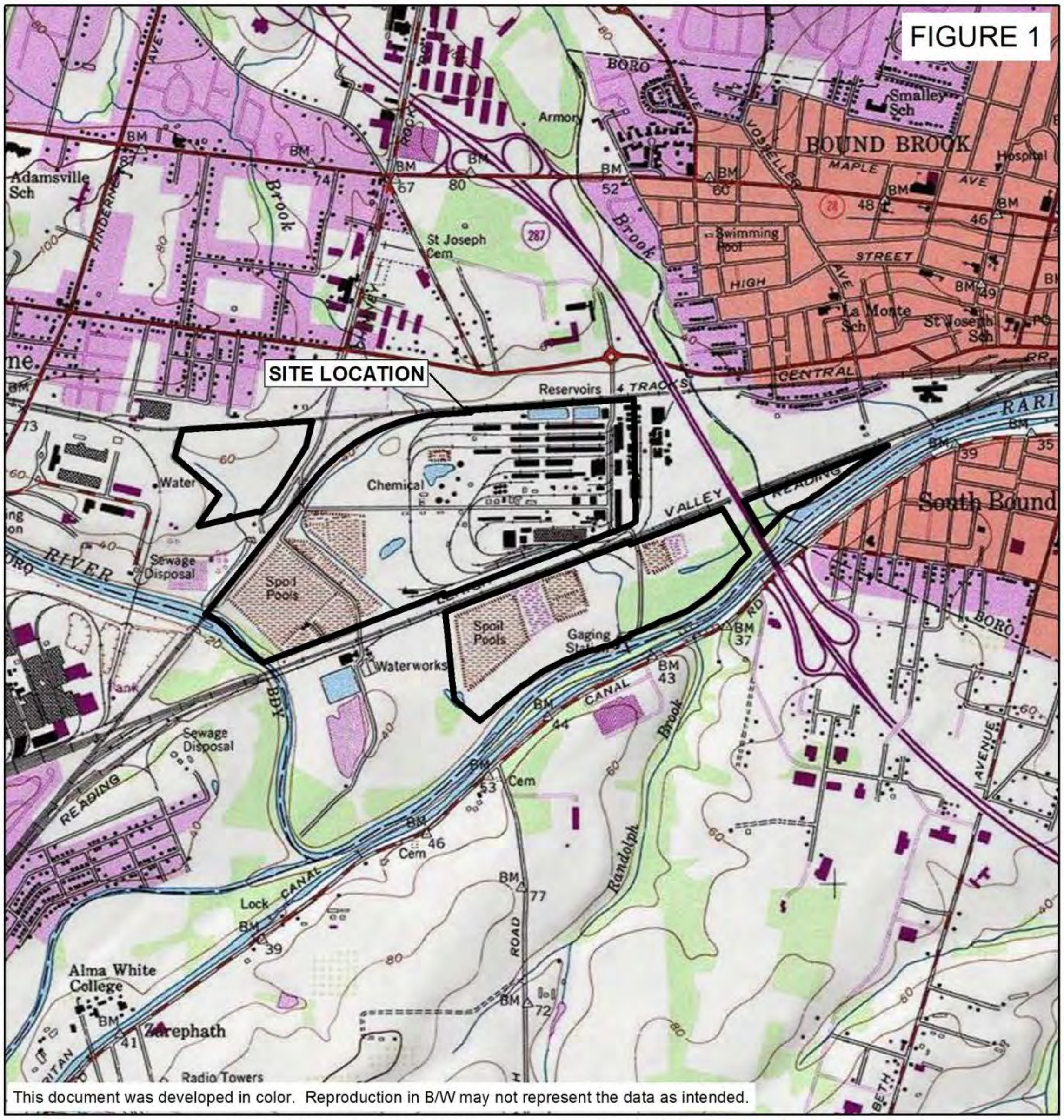
PLOT DATE: 12/12/2011 DRK



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ADAPTED FROM: BOUND BROOK, NEW JERSEY USGS QUADRANGLE

MAP LOCATION

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID
SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

SITE LOCATION

N

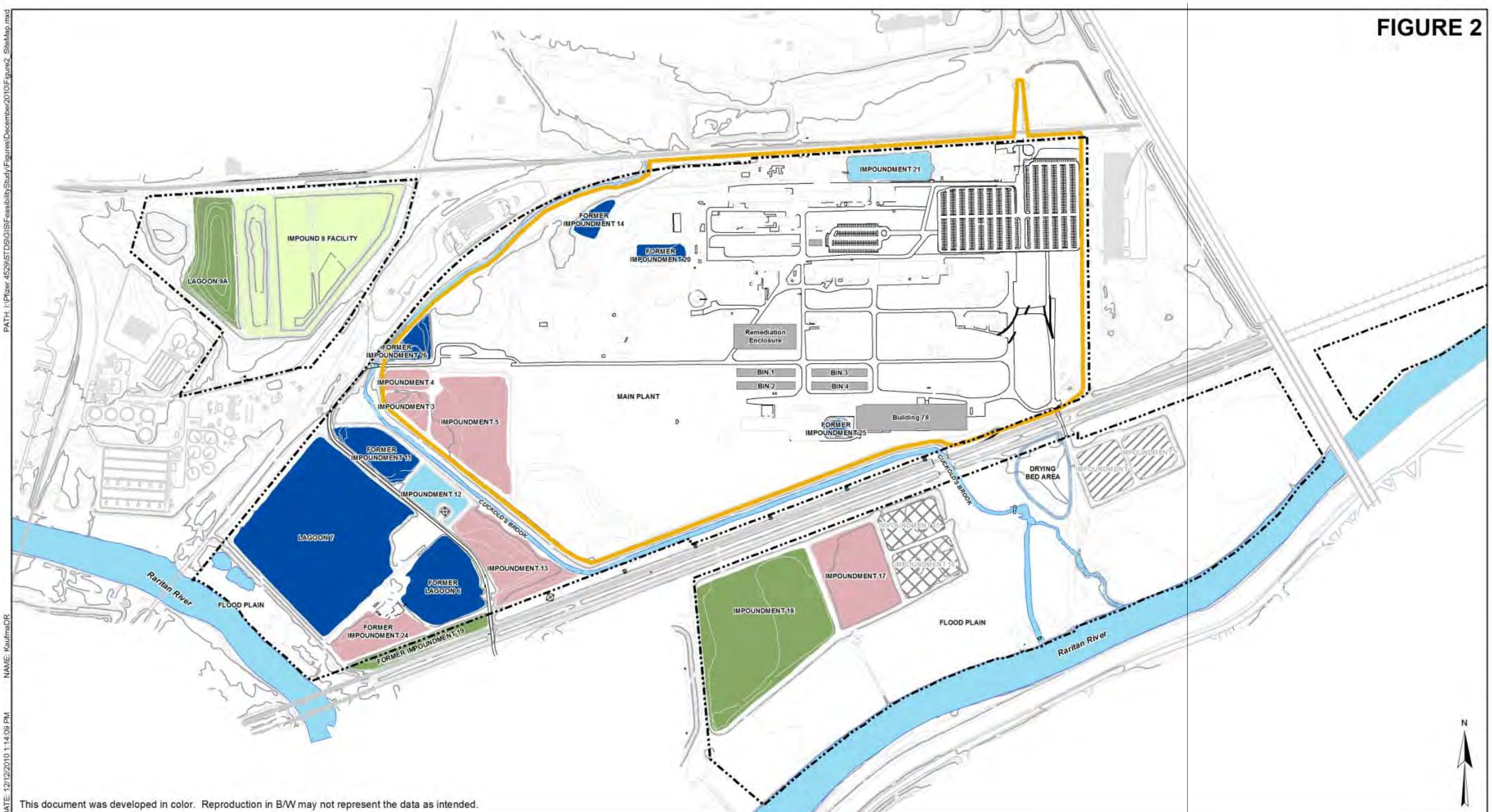
0 | 1,000 | 2,000 | 4,000 | 6,000 | 8,000
Feet

1:24,000

DECEMBER 2011
4529/47194

O'BRIEN & GERE

R2-0007367



Legend

- Approximate Property Boundary
- Flood Control Dike
- Drying Bed Area
- Impoundments to be Addressed
- Impoundments to be addressed but not Included in this SWFSR
- Impoundments Never Used for Disposal & Contain Water
- Remediated Impoundments / RCRA Lagoons & Contain Water
- Remediated Impoundments / RCRA Lagoons
- Impound 8 Facility
- Remediation on-going; not included in this SWFSR

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

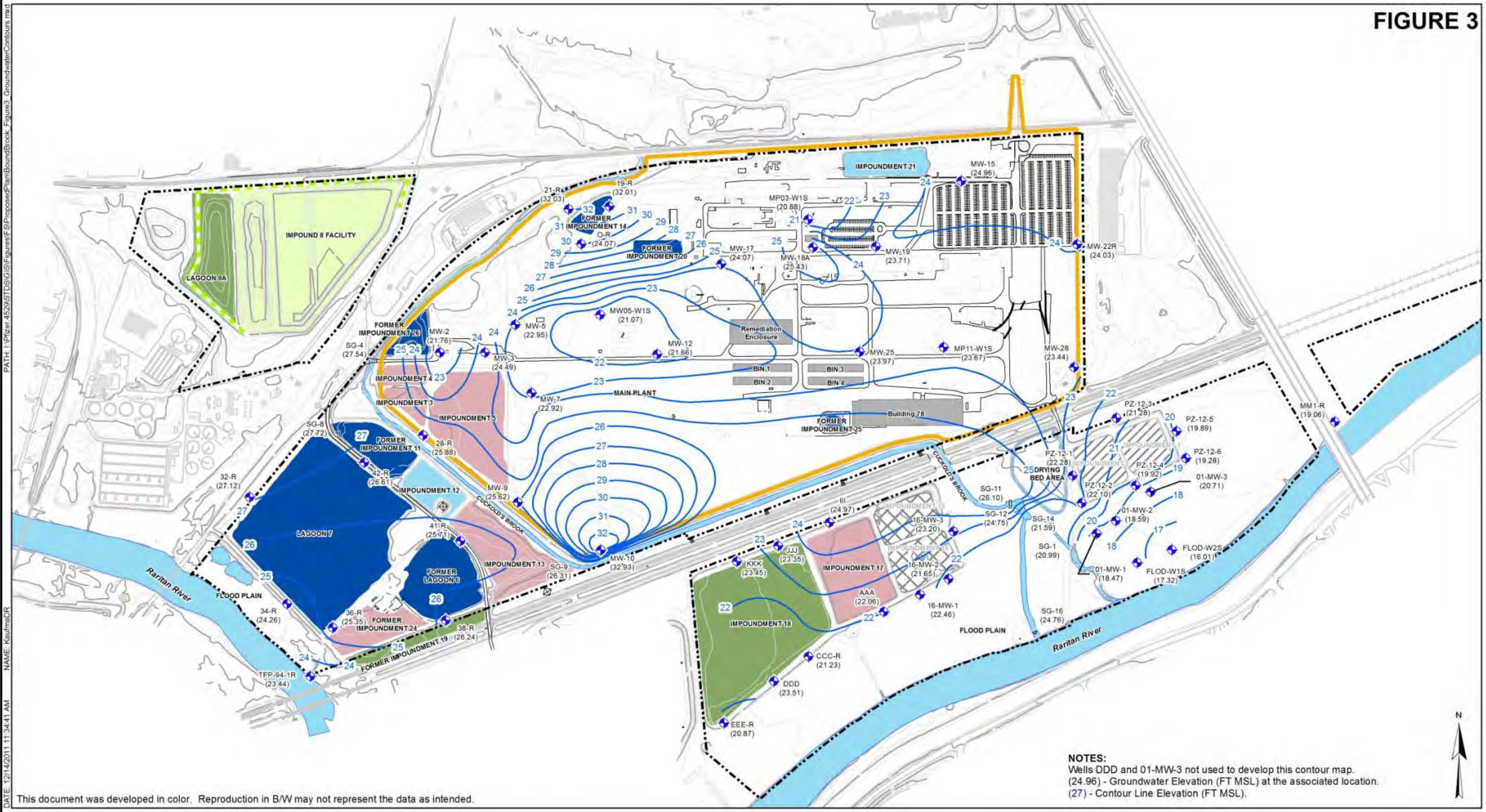
0 300 600 1,200 Feet

SITE MAP

FILE NO. 4529/45863
DATE DECEMBER 2011

O'BRIEN & GERE

R2-0007368



Legend

- Stream Gauge
- Monitoring Well
- Groundwater Elevation Contours
- Groundwater Cut-Off Wall
- Flood Control Dike
- Approximate Property Boundary
- Drying Bed Area
- Impoundments to be Addressed
- Impoundments to be addressed but not included in this SWFSR
- Impoundments Never Used for Disposal & Contain Water
- Remediated Impoundments / RCRA Lagoons & Contain Water
- Remediated Impoundments / RCRA Lagoons
- Impound 8 Facility
- Remediation on-going; not included in this SWFSR

0 300 600 1,200 Feet

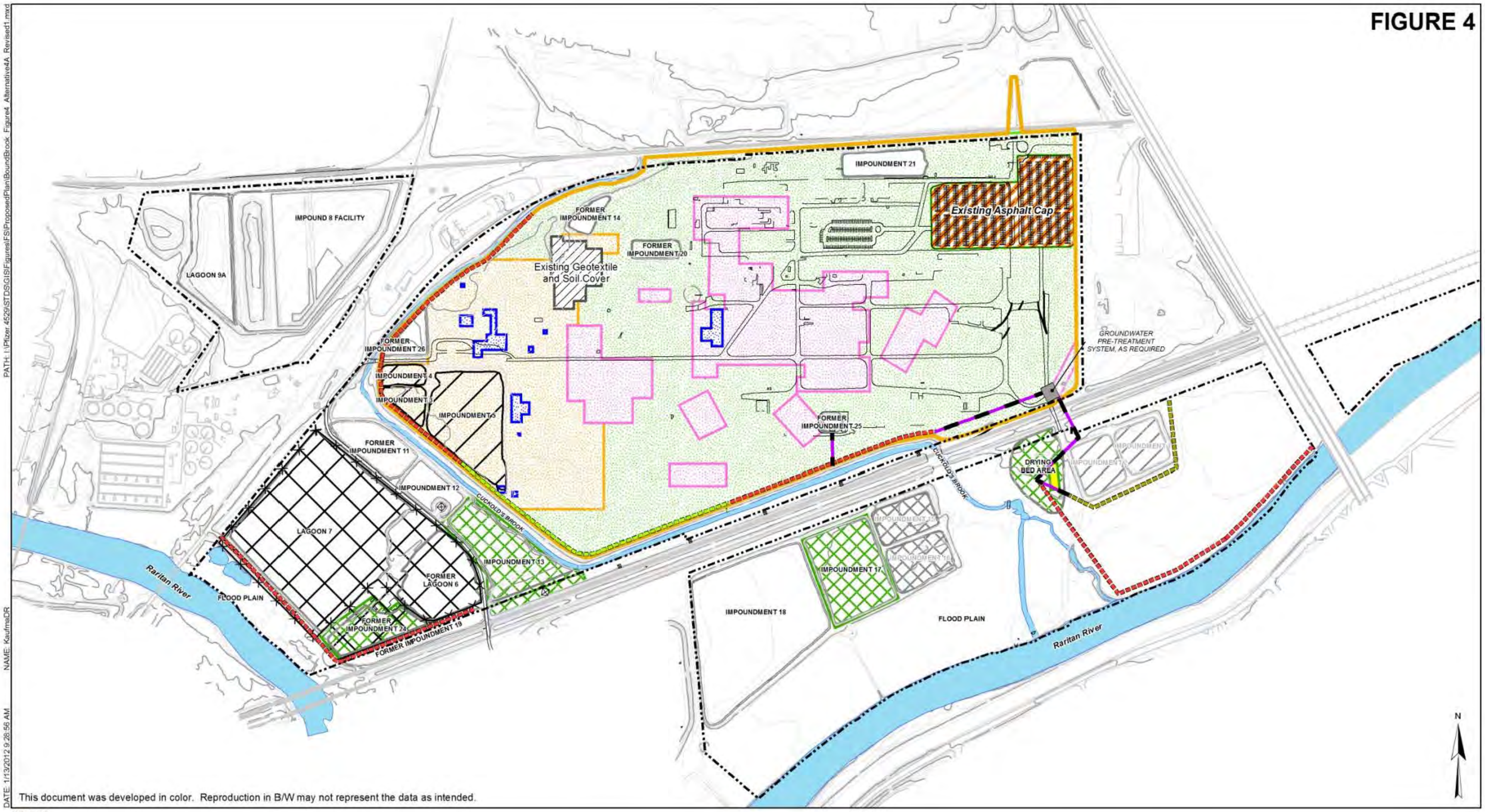
WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

OVERBURDEN WATER TABLE
AUGUST 10 & 12, 2010

FILE NO.
4529/45863

DATE
DECEMBER 2011

O'BRIEN & GERE



Legend

- Flood Control Dike
- Approximate Property Boundary
- Impoundment
- In-situ Solidification
- Proposed Area for Recovery Well
- Conveyance Piping
- Collection Trench
- Higher Gradient Section
- (Final Layout and Construction Details TBD During RA)
- Impoundments to be addressed but not included in this SWFSR
- Remediation on-going; not included in this SWFSR
- Existing Geotextile and Soil Cover Installed in 1992 for Worker Direct Contact Control - Further Control Not Required
- Existing Asphalt Cap Installed in 1999 for Hill Property Development - Further Control not Required
- Existing Fence with Water Cover for Direct Contact Control - Further Control not Required
- Excavation and Relocation to Impoundments 3, 4, & 5 - 2 Acres
- Soil Cover for Direct Contact Control - 113 Acres
- Excavation and Relocation to Main Plant for Direct Contact Control (Exc. of Imp. 13, 17, & 24 TBD by Eco. RA) - 20 Acres
- Multi-layer Cap for Vapor Control - 33 Acres (Final area based on inhalation risk greater than 10^-6)
- Multi-layer Cap for Vapor and Movement Control - 36 Acres
- Excavation and Relocation to Main Plant for Vapor and Movement Control - 0.2 Acres

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

0 300 600 1,200 Feet

ALTERNATIVE 4A
CONSOLIDATION/TREATMENT/
SOIL COVER AND STABILIZATION/
CAPPING WITH HYDRAULIC CONTROL/
TREATMENT OF GROUND WATER

FILE NO.
4529/47194
DATE
JANUARY 2012

O'BRIEN & GERE

Table 1A: Summary of CERCLA Impoundments to be addressed in Focused Feasibility Study					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** *Please note that this list may not be exhaustive
Impoundment 1	2.1	3.0 MG (Approx 26,900 CY Remaining)	Storage of sludges from the coal oil ("light oil") refining process	Approx 3.0 million gallons (MG) of light oil sludge (LOS) layer removed and recycled; solids not yet remediated, to be addressed in a separate FFS	benzene, toluene, xylene, 1,2-dichlorobenzene, naphthalene, nitrobenzene, arsenic, barium, chromium, copper, lead, mercury, nickel, selenium, silver, zinc. pH less than 2
Impoundment 2	2.3	3.1 MG (Approx 26,700 CY Remaining)	Storage of sludges from the coal oil ("light oil") refining process	Approx 3.1 MG of light oil sludge (LOS) layer removed and recycled; solids not yet remediated, to be addressed in a separate FFS	benzene, toluene, 1,2 –dichlorobenzene, naphthalene, chromium, copper, lead, mercury, nickel, selenium, zinc. pH less than 2

Table 1B: Summary of CERCLA Impoundments Currently Undergoing Remediation					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** *Please note that this list may not be exhaustive
Impoundment 15	2.8	58,750 CY (94,000 tons) remediated to date (Approx 39,050 CY Remaining)	Storage of iron oxide material resulting from iron use in aniline production	Remediation in progress - iron oxide materials being excavated and sent off-site for recycling	iron oxide, acetone, benzene, methylene chloride, xylenes, 4-chloroaniline, n-nitrosodiphenylamine, anthracene, naphthalene, phenanthrene, arsenic, copper, lead, zinc, PCBs
Impoundment 16	3		Storage of iron oxide material resulting from iron use in aniline production	Remediation in progress - iron oxide materials being excavated and sent off-site for recycling	iron oxide, acetone, benzene, methylene chloride, xylenes, 4-chloroaniline, n-nitrosodiphenylamine, anthracene, naphthalene, phenanthrene, pyrene, arsenic, copper, lead, zinc, PCBs

Table 1C: Summary of CERCLA Impoundments Addressed in this Proposed Plan					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** ***Please note that this list may not be exhaustive**
Impoundment 3	1.3	Not Yet Remediated (Approx 30,200 CY Remaining)	Storage of organic tars from the distillation of coal oil and consolidation of construction material, general plant debris and fill material	Not yet remediated; being addressed as part of this Proposed Plan	benzene, toluene, xylene, naphthalene, n-nitrosodiphenylamine, 2-methylnaphthalene, 1,2-dichlorobenzene, nitrobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, vanadium, pH of 4-8
Impoundment 4	1	18,700 CY Remediated (Approx 4,300 CY remaining in Impoundment 4 and 110,330 CY remaining in Impoundment 5)	Storage of sludges and organic tars from various production processes	Approximately 3.8 MG of pumpable sludge removed and recycled; remaining material not yet remediated, being addressed as part of this Proposed Plan	benzene, toluene, xylene, 1,2- dichlorobenzene, naphthalene, pH of 1-3
Impoundment 5 (wet)	5.2		Storage of sludges and organic tars from various production processes	Approximately 3.8 MG of pumpable sludge removed and recycled; remaining material not yet remediated, being addressed as part of this Proposed Plan	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, vanadium, zinc, pH of 3.7-9.0
Impoundment 5 (dry)	2.5	17,500 CY Remediated	Storage of sludges and, later, mixed fill materials (layered over the sludge)	Approximately 33% excavated, solidified and placed in Impound 8; remaining material not yet remediated, being addressed as part of this Proposed Plan	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, vanadium, zinc, pH of 3.7-9.0
Impoundment 13	3.9	Not Applicable (N/A) (Approx 55,000 CY Remaining)	Storage of lime and disposal of wastewater treatment sludges	Being addressed as part of this Proposed Plan	benzene, toluene, ethylbenzene, xylene, chlorobenzene, acenaphthalene, fluorine, 2-methylnapthalene, naphthalene, 1,2,4-trichlorobenzene, arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc, pH of 6.5-9.0
Impoundment 17	6.2	N/A (Approx 69,300 CY Remaining)	Storage of primary sludge from settlement of lime-neutralized effluent from on-site wastewater treatment	Being addressed as part of this Proposed Plan	acetone, toluene, ethylbenzene, and xylene, chlorobenzene, 1,2,4- trichlorobenzene, benzo(a)anthracene, bis(2-ethyl hexyl)phthalate, naphthalene, n-nitrosodiphenylamine, chromium, copper, lead, nickel, zinc. pH of 7-8
Impoundment 24	3.2	N/A (Approx 65,000 CY Remaining)	Storage of lime for primary treatment and, later, storage for sludges and general plant wastes	Being addressed as part of this Proposed Plan	acetone, chlorobenzene, methylene chloride, toluene, xylene, dibenzofuran, 1,2-dichlorobenzene, 2-methylnaphthalene, naphthalene, arsenic, chromium, copper, iron, lead, nickel, pH of 7-12.7

Table 1D: Summary of CERCLA Impoundments with Remediation Completed					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** ***Please note that this list may not be exhaustive**
Impoundment 11	2.6	25,000 CY	Disposal of sludges, furnace ash, and klinkers	Remediation completed; Closed with No Further Action per remedy selected in 1993 OU-1 ROD. Impoundment material removed and placed in Impoundment 8.	acetone, ethylbenzene, chlorobenzene, methylene chloride, toluene, xylenes, acenaphthalene, benzo(a)anthracene, fluorene, naphthalene, 2-methylnaphthalene, chromium, copper, lead, mercury, nickel, zinc
Impoundment 14	0.9	7,200 CY	Storage of organic tars	Remediation completed; Closed with No Further Action per remedy selected in 1998 OU-3 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methylnaphthalene, 1,2-dichlorobenzene, antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, zinc
Impoundment 18	15.4	217,000 CY	Storage of primary sludge from settlement of lime-neutralized effluent from on-site wastewater treatment	Remediation completed; Closed with No Further Action per remedy selected in 1996 OU-2 ROD	acetone, chlorobenzene, 2-methylnaphthalene, naphthalene, 4-chloroaniline, acenaphthalene, benzo(a)anthracene, phenanthrene, bis(2-ethyl hexyl)phthalate, fluorene, arsenic, chromium, copper, lead, zinc
Impoundment 19	2.3	12,000 CY	Storage of lime for use in wastewater treatment	Remediation completed; Closed with No Further Action per remedy selected in 1993 OU-1 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, ethylbenzene, chlorobenzene, methylene chloride, toluene, xylenes, 1,2-dichlorobenzene, 2-methylnaphthalene, naphthalene, 1,2,4- trichlorobenzene, arsenic, chromium, copper, iron, lead, magnesium, nickel
Impoundment 20	1.0	12,100 CY	Settling basin for on-site treatment of dye and pigment operation wastewater	Remediation completed; Closed with No Further Action per remedy selected in 1998 OU-3 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, barium, beryllium, cadmium, chromium, copper, lead, cyanide, mercury, nickel, selenium, silver, vanadium, zinc
Impoundment 26	2.3	22,000 CY	Storage of organic tars and, later, construction material, general plant debris and fill material	Remediation completed; Closed with No Further Action per remedy selected in 1998 OU-3 ROD. Impoundment material removed and placed in Impoundment 8.	benzene, toluene, xylene, n-nitrosodiphenylamine, naphthalene, 2-methyl naphthalene, 1,2-dichlorobenzene, antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, zinc

Table 1E: Summary of CERCLA Impoundments with No Remediation Required					
Impoundment	**Area (acres)**	**Volume Remediated**	**Description/Use**	**Current Status**	**COCs** *Please note that this list may not be exhaustive
Impoundment 9	-	No Remediation Required	Never Used	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 10	-	No Remediation Required	Never Used	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 12	-	No Remediation Required	Never Used	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 21	-	No Remediation Required	Contains emergency fire water	No remediation required based on 1990 Impoundment Characterization Program	-
Impoundment 22	-	No Remediation Required	Previously contained emergency fire water	No remediation required based on 1990 Impoundment Characterization Program; Impoundment was backfilled with clean fill	-
Impoundment 23	-	No Remediation Required	Previously used to collect river sediment from the facility's former river water treatment plant	No remediation required based on 1990 Impoundment Characterization Program	-

Table 1F: Summary of Impoundments Addressed under RCRA

Impoundment	Area (acres)	Volume Remediated	Description/Use	Current Status	COCs *Please note that this list may not be exhaustive
Lagoon 6	5.5	113,500 CY	RCRA impoundment; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA. Waste in Lagoon 6has been removed, solidified, and placed in the Impoundment 8 Facility.	NA
Lagoon 7	20.9	241,400 CY	RCRA impoundment; in the process of being closed in accordance with approved RCRA closure plan	Remediation partially completed; Approx. 95% of waste in Lagoon 7 has been removed, solidified, and placed in the Impoundment 8 Facility.	NA
Lagoon 8	11.5	60.8 MG	RCRA impoundment; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA. Waste in Impoundment 8 [Old] has been removed, solidified, and placed in the Impoundment 8 Facility.	NA for Lagoon 8 (Old); Impoundment 8 Facility COCs: chloroform, tetrachloroethene, trichloroethene
Lagoon 9A	4.1	52,900 CY	RCRA impoundments; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA; Impoundment 9A (plant effluent sludge) was closed in-place by installing a double synthetic liner capping system	chloroform, 1,1-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, tetrachloroethene, trichloroethene, 1,1,1-trichloroethane, carbon tetrachloride, iron, manganese
Impoundment 25	0.2	1,600 CY	RCRA impoundments; addressed in accordance with approved RCRA closure plan	Remediation completed under RCRA Effluent Collection Basin for Plant Effluent (sludge removed and closed in 1988 with NJDEP approval)	NA

Table 2A: Impoundments

Direct Contact Control	
Numerical Values not Applicable	
Vapor Control (mg/kg)[1]	
Benzene	4.23
Toluene	11,110
Xylene	4,470
Chlorobenzene	2,590
Naphthalene	948
Movement Control[2]	
Tarry substances of Impoundments 3, 4, and 5 – Numerical Values not Applicable	

Table 2B: Main Plant Soils

Direct Contact Control (mg/kg)[3]	
Antimony	410
Arsenic	19
Benzo(a)anthracene	2.1
Benzo(a)pyrene	0.21
Cadmium	800
Chromium (total)	NC[4]
Chromium VI	5.6
Cobalt	300
Cyanide	20,000
Lead	800
Mercury	43
Nitrobenzene	24
Total PCBs	0.74
Xylene (total)	2,700
Vapor Control (mg/kg) [1]	
Benzene	4.23
Toluene	11,110
Xylene	4,470
Chlorobenzene	2,590
Naphthalene	948
Movement Control (mg/kg) [2]	
Benzene	4,460
1,2 Dichlorobenzene	98,400
n-Nitrosodiphenylamine	352,000
Nitrobenzene	12,300
Naphthalene	6,180

Table 2C: Flood Plain Soils

Direct Contact Control (mg/kg)[3]	
Chromium VI	5.6
Lead	800
Mercury	43
Vapor Control (mg/kg) [1]	
Benzene	4.23
Toluene	11,110
Xylene	4,470
Chlorobenzene	2,590
Naphthalene	948
Movement Control (mg/kg) [2]	
Benzene	4,460
1,2 Dichlorobenzene	98,400
n-Nitrosodiphenylamine	352,000
Nitrobenzene	12,300
Naphthalene	6,180

Table 2D: Groundwater

	NJ GWQS (μg/l)[5]	NJ MCL (μg/l)[5]	EPA MCL (μg/l)[5]
Benzene	1	1	5
1,2-Dichlorobenzene	600	NC	600
2-Methylnapthalene	30	NC	150
Naphthalene	300	300	0.14
Nitrobenzene	6	NC	0.12
n-Nitrosodiphenylamine	10	NC	NC
Toluene	600	1000	1000
Xylene	1,000	1,000	10,000

Notes:

(1) These values are preliminary and a more refined assessment method will be developed and implemented during the Remedial Design phase to appropriately delineate areas requiring vapor control.

(2) While numerical criteria were developed to aid in defining the extent of contaminated media requiring movement control, visual observation of tarry substances will also be utilized to identify these areas, regardless of whether the tarry substances exceed the numerical criteria.

(3) Soil remediation goals were selected based upon consideration of both risk-based concentrations and promulgated NJDEP Non-Residential Direct Contact Soil Remediation Standards. NJDEP Impact-to-Groundwater Soil Screening Criteria were also evaluated as “To-Be-Considered” criteria.

(4) NC denotes no criteria available.

(5) The more stringent of the EPA federal MCLs, NJDEP groundwater quality criteria, NJDEP MCLs, and site-specific, risk-based concentrations will be utilized as the remediation goal for groundwater.

ATTACHMENT B: PUBLIC NOTICE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY INVITES PUBLIC COMMENT ON THE PROPOSED PLAN FOR THE AMERICAN CYANAMID SUPERFUND SITE TOWNSHIP OF BRIDGEWATER, SOMERSET COUNTY, NEW JERSEY

The U.S. Environmental Protection Agency (EPA) announces the opening of a **45-day comment period** on the Proposed Plan and preferred remedial alternatives to address contamination at the American Cyanamid site in Bridgewater Township, New Jersey. The comment period **begins on February 16, 2012 and ends on March 31, 2012.** As part of the public comment period, EPA will hold a public meeting on **Thursday, March 8, 2012** at 7:00 PM at the Somerset County Vocational and Technical High School, 14 Vogt Drive, Bridgewater, New Jersey. Please contact Ms. Cecilia Echols, EPA's Community Involvement Coordinator, at 212-637-3678 or 1-800-346-5009 for more information.

The site is listed on the Superfund National Priorities List. EPA, with NJDEP support, recently completed a Comprehensive Site-wide Feasibility Study to evaluate remedial alternatives for the site. The Proposed Plan identifies EPA's preferred remedial alternative for addressing site-wide soils, groundwater, and impoundments (waste disposal areas) that have not yet been remediated with the exception of Impoundments 1 and 2 and provides the rationale for proposing this alternative. EPA's preferred remedial alternative consists of the following components:

- Waste material located within Impoundments 3, 4, and 5 will be entirely treated in place through stabilization and solidification technologies to prevent movement. This treatment method is a proven technology that immobilizes contaminants. Following solidification, an engineered vapor control barrier will be installed. These waste materials typically consist of tarry substances or high-hazard materials defined by EPA as Principal Threat Waste.
- For site-wide soils that exhibit similar characteristics as identified within Impoundment 3, 4, and 5, complete excavation and relocation to Impoundments 3, 4, and 5 will be required along with the same treatment methods mentioned above.
- For site-wide soils determined to require a vapor control barrier, which also includes a vapor mitigation system, an impermeable multi-layered engineered cap will be constructed. These soils typically contain volatile and semi-volatile organic compounds that have the potential to migrate into the atmosphere.
- For site-wide soils determined to require a direct contact barrier, an engineered soil cover will be utilized. Soils requiring this engineered cover typically consist of low-level contaminated media above NJDEP soil remediation standards.
- An ecological risk assessment will be conducted on three impoundments located in the flood plain to confirm the appropriate treatment for these materials.
- The existing bedrock groundwater collection system will be improved by relocating the primary extraction wells in a more central location and by adding several new extraction wells to ensure that all site-related groundwater is captured. In addition, a recovery system (such as trenches, wells, and/or containment walls) will be constructed for collection of overburden groundwater at several locations. The details of these improvements will be developed during the remedial design phase.

Institutional controls, monitoring, and periodic reviews will also be required to ensure that the remedy remains protective of public health and the environment. During the **Thursday, March 8, 2012** public meeting, EPA representatives will be available to discuss EPA's rationale for recommending this remedial alternative and to receive public comments.

The Proposed Plan is available electronically at http://www.epa.gov/region02/superfund/npl/american_cyanamid. The Proposed Plan summarizes information that can be found in greater detail in several reports, including the Comprehensive Site-wide Feasibility Study, located in the Administrative Record. The Administrative Record files are available for public review at the following information repositories established for the Site:

Bridgewater Township Library: 1 Vogt Drive, Bridgewater, NJ (908) 526-4016
USEPA Region 2: Superfund Records Center, 290 Broadway, 18th Floor, New York, NY (212) 637-4308
NJ Department of Environmental Protection: 401 East State Street, Trenton, NJ (609) 341-3121

EPA relies on public input to ensure that the selected remedial alternative for each Superfund site meets the needs and concerns of the local community. It is important to note that although EPA has identified a preferred remedial alternative for the site, no final decision will be made until EPA has considered all public comments received during the public comment period. EPA will summarize these comments along with EPA's responses in a Responsiveness Summary, which will be included in the Administrative Record file as part of the Record of Decision. **Written comments and questions regarding the American Cyanamid site, postmarked no later than March 31, 2012, may be sent to:**

Joseph Battipaglia, Remedial Project Manager
U.S. Environmental Protection Agency
290 Broadway, 19th Floor
New York, New York 10007-1866
Email: Battipaglia.joseph@epa.gov

ATTACHMENT C: TRANSCRIPT FROM PUBLIC MEETING

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

- -x

AMERICAN CYANAMID SUPERFUND SITE
PUBLIC MEETING

- -x

Somerset County Vocational
Technical High School
14 Vogt Drive
Bridgewater, New Jersey

March 8, 2012
7:00 p.m.

P R E S E N T E R S :

JOSEPH BATTIPAGLIA,
EPA Remedial Project Manager

MONICA BAUSSAN,
EPA Remedial Project Manager

CECILIA ECHOLS,
EPA Community Involvement Coordinator

WALTER MUGDAN,
Division Director, Superfund Program

EPA REPRESENTATIVES - SUPERFUND PROGRAM

MARK AUSTIN,
EPA Remedial Project Manager

THOMAS BUDROE,
On-scene Coordinator, Removal Program

ANGELA CARPENTER,
EPA Branch Chief, Special Projects

JULIE McPHERSON,
Risk Assessor

MICHAEL SIVAK,
Team Leader

EPA REPRESENTATIVES - PUBLIC AFFAIRS DIVISION

BONNIE BELLOW,
Division Director, Public Affairs

MELISSA DIMAS,
Community Involvement Coordinator

MIKE McGOWAN,
Community Affairs Team Leader

ELIAS RODRIGUEZ,
Press Officer

NJDEP REPRESENTATIVES:

HAIYESH SHAH,
Project Manager

ALLAN MOTTER,
Technical Coordinator

MS. ECHOLS: Good evening. Thank you all for coming out to the American Cyanamid Public Meeting.

I'm Cecilia Echols, and I will be your moderator tonight. And I just want to let you know a little bit about why we're here, what our intentions are, how the program's going to go, the presentations, the question-and-answer period.

The purpose of the meeting is to discuss the proposed plan of cleanup for site-contaminated soils, groundwater, and six waste disposal areas. The soil, groundwater, and waste disposal areas, called impoundments, are contaminated with volatile organic compounds and other hazardous materials.

On the agenda, we have several people from EPA and DEP. My name, again, is Cecilia Echols. I'm the Community Involvement Coordinator.

We have Walter Mugdan, the Division Director for the Superfund

Program. He will discuss Part I, Superfund Overview.

Then we have Monica Baussan. She's a Remedial Project Manager. She will discuss Part II, Site History.

Joseph Battipaglia, he's also a Remedial Project Manager. He will discuss Part III, Remedial Alternatives.

Additional EPA representatives for the Superfund Program are Angela Carpenter, Branch Chief, Special Projects; Michael Sivak, Team Leader; Mark Austin, Remedial Project Manager; Thomas Budroe, On-scene Coordinator, he's down here, with the Removal Program; Julie McPherson, Risk Assessor, she's also down here.

Additional EPA representatives from the Public Affairs Division are Bonnie Bellow, Division Director, Public Affairs Division; Mike McGowan, Community Affairs Team Leader; Melissa Dimas, another Community Involvement Coordinator; and Elias Rodriguez, he's the Press Officer.

Then we have two New Jersey DEP representatives; Haiyesh Shah, he is the NJDEP Project Manager, and Allan Motter, he is the Technical Coordinator.

Just to mention, the public comment period began on February 16 and it was to end on March 31; however, the Agency has received several inquiries to extend the public comment period, and it will end on May 15.

There are three information repositories; the Bridgewater Township Library, the NJDEP offices in Trenton, and the EPA office in New York City.

We have a stenographer. She's here to document the entire presentation, along with any questions, which will become part of the Responsiveness Summary.

After the public comment period, the Agency will review all comments and questions submitted tonight, as well as those received within the Regional Office. Then a Record of Decision is signed by the Regional Administrator. This document will address the Agency's decision to clean up the site.

I hope everyone signed in tonight. I hope you signed in legibly so you can be recorded as part of our mailing list. More importantly, since we're in the electronic age, I hope you wrote your e-mail addresses very well.

We have proposed plans. I hope everyone received one who needed it.

There are mics that are going to be used; one here, and there will be one on the other side. And everyone who has a question should come up to the mic. And there will be -- there are so many people here, there will be three minutes per person to ask their question and to receive their answer so we can keep it moving.

We are here until 10 o'clock, so

we may have to start wrapping it up around 9:50.

If there's anyone here who can't come to the mic but would like a card to write their questions down and have them stated, we have some in the back and some in the front. These are our comment cards, which will also be part of the Responsiveness Summary.

The bathrooms are in the back. If you would please turn off -- well, silence your cell phones so we won't be interrupted with the nice rings, we would appreciate that.

And please hold all of the questions until the last presenter has finished.

And now we will hear from our first presenter, which is Walter Mugdan.

MR. MUGDAN: Thanks, Cecilia.

So, just to review the agenda for this evening, as Cecilia indicated, we're going to go forward in three parts. First, we're going to have a brief overview of the Superfund program. I'll give that.

Then we're going to move on to a discussion of the site background and the history of this site and some of the other investigations that have been carried out to characterize the site.

And then Part III, we'll move to a discussion of the objectives of the remediation that we intend to carry out and the proposed plan that we are putting forward tonight. We'll then move on to comments and questions.

So, we'll start with a brief overview of the Superfund program. This will be old information for some of you, but perhaps not for all of you.

What is it?

The Superfund is the colloquial name of a law that has a very long name; Comprehensive Environmental Response Compensation and Liability Act. You may hear it referred to by its acronym CERCLA. You'll also hear it called Superfund.

The goals of the Superfund law are pretty straightforward. First, and most important, it is to protect human health and the environment by cleaning up polluted sites.

We want to make sure that we're involved in communities fully in the Superfund process, and we have a variety of mechanisms to do that. One of them is meetings of this sort that we're having here this evening. There are other mechanisms we will mention and that you may become familiar with.

Another major objective of the Superfund law is to have what are called "Responsible Parties" pay the cost of the cleanup. These cleanups can be extremely expensive and very complicated.

The name of the law, Superfund, the colloquial name, comes from the fact that originally, when the law was first passed by Congress in 1980, Congress created a special fund, which was then colloquially called the Superfund. It's a trust fund that was established, and it was funded through certain taxes that were imposed upon the chemical and petroleum industry.

As a practical matter, those taxes lapsed. The legal authorization for those taxes lapsed in 1995, and Congress since that time declined to reauthorize the tax. In the last several years, the President has requested Congress to reauthorize that tax, but so far it hasn't happened.

Nonetheless, Responsible Parties, which are a group of defined classes of entity, if they can be identified by EPA and if they are viable, meaning if they have sufficient funding and capability to do that, EPA requires them to carry out the work in the first instance.

If they are unable or unwilling to do so, there is a fund still there. Thus, although the tax has sunset, Congress continues to appropriate money for Superfund cleanups every year at about the same rate that it did back when the tax was in operation, but that money now comes out of the general revenues of the United States. All of us as taxpayers pay that rather than coming out of a specified tax upon certain industries.

So, these Responsible Parties fall into four classes, or four categories. They include whoever owns or operates the site in question that has to be cleaned up today; whoever owned or operated it in the past at a time when hazardous substances were disposed of or came to be on the property; people who generated hazardous wastes that were carried to a different location if that's the location of interest; and people who transported hazardous waste from a location to another site of interest, provided that they selected that site. So, these are the four legal categories of persons who are responsible.

As most of you know tonight, we have been working for some time now with Pfizer. Pfizer is the current owner of the site, or is the ultimate corporate owner of the site, but you know the site as the American Cyanamid site. So, there's a corporate history here.

American Cyanamid owned and operated the factory that was at this location. The hazardous substances that are on the site, underneath the site, that are of concern were primarily generated by American Cyanamid when it operated this site.

In due course, American Cyanamid ceased to operate the site. The company was eventually purchased or acquired by another company called American Home Products. In due course, that company was acquired by Wyeth. And in due course, Wyeth was acquired by Pfizer.

So, historically, Pfizer has no particular corporate involvement with the generation of hazardous materials at this location, but under American Law of Corporate Successorship, if you buy a corporation, you buy not only its assets but also its liabilities.

So, that's how the responsible -- the liability scheme, as it's typically called in Superfund, that's how it works.

So, we call these either Responsible Parties or you may hear the term Potentially Responsible Party. That's a term we also use, and then we abbreviate that PRP.

We're a government bureaucracy, we tend to speak in acronyms. We'll try not to do that. But if we slip into it, PRP is our shorthand for the Primary Responsible Party.

So, those are the main goals of Superfund.

We use two different kinds of response actions to effectuate these goals. They are called Removal Actions and Remedial Actions. Although there's some overlap, in general terms, a Removal Action is usually shorter, quicker, less expensive, and requires less detailed and elaborated study in order to figure out what to do.

The Removal Actions range from emergency actions -- so, if a truck or a tanker or a railroad car overturns with a hazardous chemical in it, that's an emergency, we need to deal with it right away. That's a species of Removal Action.

But Removal Actions can also be fairly elaborate, fairly extensive, and quite expensive. And there are Removal Actions that have taken place on the American Cyanamid site and that, indeed, are taking place as we speak.

And that takes months or even years to carry out and may take millions of dollars to implement. And you'll hear something about those this evening. Those are Removal Actions.

The other variety or flavor of Superfund cleanup is called a Remedial Action. These are limited by law to be carried out only at a certain group of sites, and those are sites that have been placed on what is colloquially known as the Superfund List. It's formerly called the National Priorities List, or NPL. That's another acronym you may end up hearing.

So, there are about 1,700 sites, give or take, across the United States that have ever been placed on the NPL. So, this list is a fairly exclusive one of more important sites that create greater risk and that generally require more elaborate study in order to figure out what it is that should be done, and they're often much more expensive than Removal Actions.

This is a schematic or cartoon that describes the Superfund process primarily for remedial sites, although I'm going to show how Removal Actions may filter into it.

And it's a pathway. It starts down here in the lower left-hand corner with something called a PA/SI. That is a Preliminary Assessment and Site Investigation.

When we receive information through a variety of means about a site that, in our judgment, may require us to or may present some kind of risk that requires some kind of assessment, the first step in the process is to do a PA and an SI.

Historically, since the beginning of Superfund, around 1980, nationwide I think we have done something on the order of fifty or sixty thousand PA/SIs. And as you can see, it's a pretty narrow filter that you have to get through in order to get on the Superfund list with only 1,700 sites, give or take, that have actually been placed on the Superfund list.

We do Removal Actions at many more sites, sites that do not get on to the Superfund list. But that list of remedial sites is the one that we're talking about now.

So, there's the NPL listing process. There is a formal series of tests that we have to go through to evaluate a site to determine whether or not it should be placed on this list. And that involves a fairly elaborate story, a numerical ranking. And if a certain number of points are assigned to the site when it passes through this system, then it is eligible for placement on the list.

It doesn't mean it necessarily will be placed on the list. There may be other reasons why it would not. But at a minimum, it has to get that particular number of points on the score.

When the site is listed, the next step is to carry out some very detailed studies. And they are the Remedial Investigation, or RI, and the Feasibility Study, or FS.

Again, typically, although they are nominally two different separate studies, they are usually bundled together, so we typically refer to them as the RI/FS. And that's a term you'll hear probably quite frequently.

Again, I'm trying to introduce you to these acronyms that we can't help from using.

The Remedial Investigation is a detailed assessment of the nature and extent of the contamination at the site. So, "nature" means what chemicals are there and what quantities, and "extent" means where have they come from and where are they going to; vertically, horizontally, across the landscape, down into the ground, into the air, into the water, into the groundwater, surface water, wherever it is.

So, what chemicals are there,

where are they coming from, where are they going to. That's the purpose of the RI/FS.

And one additional element of the RI/FS is to do a Risk Assessment. Once we know what chemicals there are, where they're coming from, and where they're going to, we then evaluate what degree of risk do those chemicals in those quantities and in those pathways present to human beings and to other bio; the critters and vegetation and whole ecosystem.

So, there's human health risk, which is self-evident, the risk that is posed to human beings, and there's what we call ecological risk, which is the risk to all the other biological elements of the ecosystem. Both assessments are part of the RI/FS.

Once we have done that, it then falls to EPA -- let me go on to the FS, the Feasibility Study. I apologize.

The next step is having

identified what the problem is and what the risks are, the Feasibility Study is the next step to say: Here are a number of ways in which these risks can be addressed and in which these problems can be addressed.

And by law, we have to start with something called the no action alternative, which is kind of like a baseline. What would happen if we did nothing? What degree of risk is posed now and in the future? How would the groundwater contamination continue to move? And so on.

And then a series of engineering alternatives are identified which could potentially address these risks and minimize or eliminate them. And they're listed one after another. There may be a two-step process or may be a one-step process.

The two-step process might involve some of them being screened out with a relatively limited amount of analysis. If that limited analysis shows that a certain alternative just isn't really going to cut it, it may be screened out for further evaluation.

But all the remaining alternatives then have to go through a detailed evaluation against nine legal criteria. These nine criteria are grouped into three groups.

The first two are the most important. They're the ones that every remedy has to fulfill, and the first of those is the most important, and that is that the remedy be fully protective of human health and the environment.

The second of those two most important criteria is a little bit more complicated, more legalistic. It requires that the remedy also satisfy existing regulatory or legal requirements that apply to the kind of problem at hand.

There are other criteria then, and they run down -- each one of them has to be evaluated for every one of the alternatives that remains after any screening gets completed.

So, the full Feasibility Study goes into elaborate detail of each of the nine criteria for every one of the alternatives.

Once that study is completed, the RI and the FS is completed, then it's EPA's obligation to propose a remedy. So, we have to look through these alternatives from one to ten or twelve to fifteen or however many there are, and we come forward with a proposal. That is what we have done here today.

And that proposal gets put out for public comment. By law, we give a 30-day public comment period. In the complicated cases, the cases that have a great deal of public interest, we extend that.

We started out here with a 45-day public comment period off the bat. We've already received, as Cecilia indicated, an extension of that time, so we're doubling this period of time that's available to 90 days. That 90 days will end on May 15.

So, we're in this green phase right now, proposed plan, public meeting, public comment period.

As Cecilia pointed out, we have a court reporter here who's taking down verbatim everything that's said. So, when we get to the Q&A session, when people come down and ask a question or make a statement, again, we ask that you limit it to three minutes because we have a lot of people here and we want to make sure everybody has a chance. That will be part of the Administrative Record.

MR. SPIEGEL: Why do we only get three minutes when you get to talk as long as you want?

MR. MUGDAN: What we're going to suggest is that we start with three minutes, we go through everybody; if we've gotten through everybody who wants to talk and we have more time before we have to leave the facilities, we will be delighted to have people come down and amplify their comments.

But we have to leave the facility and be out not later than ten, and there are quite a lot of people here. I'm sure quite a lot of people want to be heard.

This, however, is not the only opportunity to comment. The comment period, as we said, is open until May 15 and written comments can be submitted at any time throughout this period, and we encourage you to do that.

At the end of that time, we will respond to all the comments, we will prepare a Responsiveness Summary, and, eventually, at the end of that process, we'll make the decision.

Again, we're legally obligated. We will write that document in a Record of Decision, or ROD. Once that

ROD is issued, it becomes a legally binding obligation that we will request the Responsible Party to carry out.

The next step is to do a design, a Remedial Design, or RD. The design for this site and many sites are quite complicated and will take some number of years. And there will be a Remedial Action, or RA, that will follow the design.

Every step of the way, although we request the Responsible Party to do the work, EPA is overseeing every step of the way and every major element has to be approved by EPA. So, design and all actions under the design and under the remediation work have to get approved by EPA and observed and watched by EPA.

At some point, the construction will be complete, and that is a particular milestone that we take note of. That's the point at which we are satisfied that all the work that needs to be done has been done.

There may be long-term monitoring, long-term management of groundwater, or things of that sort that have to happen. The remedy is likely to have to require operation and maintenance for years, decades, perhaps forever.

At some point, we may choose to delete the site from the National Priorities List, again, if it satisfies certain other criteria.

And one of the goals is, to the extent possible, to leave sites ready for reuse. Reuse can come in many different forms. It's typically up to the municipality in question to make the decisions in a zoning fashion as to what kinds of reuse they want to make on the site. They may also be limited on the kind of reuse that's possible or available based upon what the site looks like once the work is completed.

So, let's move on now. I'm

going to ask Monica to come up and talk about the site history and characterization.

MS. BAUSSAN: Hi, everyone. My name is Monica Baussan, and I'll be talking to you tonight about the site history and characteristics, the nature and extent of contamination, and a brief summary of the risk at the site.

So, let's start with site location. The site is located in the southeastern section of Bridgewater Township. As you can see over here, the site is outlined. It's approximately 435 acres big and it's divided mainly between the main plant and the flood plains. These two areas will be later discussed in detail as the presentation goes along.

Let's start with a little bit of history on the ownership and manufacturing at the site. As Walter already mentioned before, the site was originally built in 1915 as Calco

Chemical and then was later purchased by American Cyanamid in 1929.

Its operation went from the 1930s all the way to 1999, when the facility became inactive. And throughout that time, 27 impoundments were constructed for waste disposal areas and lagoons.

In 1994, American Home Products Corporation, a/k/a Wyeth, purchased American Cyanamid. And in 2009, Pfizer purchased Wyeth.

Now, for enforcement history of the site, let's start with 1983. The site was located in the National Priorities List.

Later, in 1987, New Jersey Department of Environmental Protection issued a permit for American Cyanamid requiring pumping and monitoring of the groundwater.

In 1988, American Cyanamid entered into a legal agreement with New Jersey DEP to address the impoundments, the site soil, and the groundwater. And later, this legal agreement was amended to include the existing groundwater pumping and monitoring treatment at the site.

In 2009, EPA assumed the lead role from NJDEP. And in July 2011, Wyeth entered into another legal agreement with EPA addressing the seeps into the Raritan River.

Now, moving off to a little bit of description of the site, as mentioned before the site had 27 impoundments. Within these 27 impoundments, 16 impoundments were addressed under CERCLA, 5 impoundments under another environmental law called the Resource Conservation and Recovery Act, 6 impoundments did not require any remediation.

Now, as for the impoundments addressed under CERCLA, six already have been remediated; 1 and 2 are being re-evaluated into a separate Focussed Feasibility Study; Impoundments 15 and 16 are undergoing remediation; and Impoundments 3, 4, 5, 13, 17, and 24 are currently being addressed under this proposed plan.

Now, as you can see over here in this site map, you can see some of the impoundments. But the ones that we want to focus on are the ones in the color pink, which are the impoundments that are currently being addressed under this Proposed Plan.

MR. SPIEGEL: Can you go back so we can see the map again?

Which lagoons are being addressed under this plan?

MS. BAUSSAN: The pink.

MR. SPIEGEL: What about the blue, the dark blue?

MS. BAUSSAN: The dark blue have already been remediated.

MR. SPIEGEL: Which are 1 and 2, on the far right?

MR. MUGDAN: 1 and 2 are here.

MS. BAUSSAN: But those are being addressed in a separate Feasibility Study.

Now, the site was originally separated into seven phases which we call Operable Units. These included the impoundments, the site soils, the groundwater, the Hill's property, and the site wetlands.

Let's start with Operable Unit 1, which had a Record of Decision signed in 1993 and included Impoundments 11, 13, 19, and 24.

This called for excavation, solidification, and consolidation into Impoundment 8 facility. Impoundments 11 and 19 were completed in 1997 and 1995, and Impoundments 13 and 24 have not yet been remediated, so they are being currently addressed in this Proposed Plan.

For Operable Unit 2, a Record of Decision was signed in 1996 and it also called for excavation, consolidation, and solidification. It also added capping, fencing, and berm improvements.

In 1998, a document called

Explanation of Significant Differences was signed in order to change the remedy for Impoundments 15 and 16 to include the recycling of iron oxide.

Impoundment 17 has not yet been remediated, so it's currently being addressed under this proposed plan.

And Impoundment 18 was completed in 1998 per its 1996 ROD.

For Operable Unit 3, a Record of Decision was signed in 1998 and included Impoundments 1 through 5, 14, 20, and 26, and it called for a Low Temperature Thermal Desorption, biotreatment, and consolidation and designated Impoundment 8 as a RCRA facility.

Now, as mentioned before, Impoundments 1 and 2 are currently being re-evaluated in another Feasibility Study. Impoundments 3, 4, and 5 are currently being addressed under this Proposed Plan.

Impoundments 14 and 20 were completed in 2010, and 26 was completed in 2002.

Operable Unit 4 included the site soils, which are also being addressed under this proposed plan.

Now, for Operable Unit 5, we're discussing the site groundwater. As mentioned before, in accordance with the legal agreement, a groundwater monitoring program was established and included the pumping of the site's groundwater, which includes 650,000 gallon a day of the groundwater.

A Remedial Investigation was completed in 2006; however, it concluded that additional investigation was needed; therefore, the groundwater is also part of this Proposed Plan.

For Operable Unit 6, the Hill's property, a Record of Decision was signed in 1996, and it called for a no further action. Later on, it was deleted from the NPL, in 1998, and then it was redeveloped for commercial use.

For Operable Unit 7, it is the site wetlands, which are also being addressed under this Proposed Plan.

Now, in this slide over here, it's just to show you the volume remediated versus the volume remaining. Now, 73 percent of the material in the impoundments has already been remediated, and in volume terms it's approximately 1.19 million cubic yards versus 427,000 cubic yards.

Now, for those of you who are football fans out there, in another form of reference, the 1.1 million cubic yards is equivalent to a football field filled over two hundred yards versus eighty yards high.

In 2004, all remedial activities on the site were suspended pending the completion of a Remedy Review Report. This was due to the technical difficulties encountered in Operable Unit 3, also the difficulties containing air emissions with permissible levels and the increased schedule for completion, as well as the cost estimate, which escalated over a hundred percent of the original cost.

In 2005, this report was completed and determined that the previously selected remedies for the remainder of the site were inappropriate and a reassessment of the entire site was needed.

In 2005, another report called a Data Adequacy Report reviewed the already existing soils and groundwater data and concluded that there was sufficient data for the impoundments and the soils, but more additional investigation was needed for the groundwater.

In 2009, EPA and New Jersey DEP, as mentioned before, separated Impoundments 1 and 2 to be re-evaluated due to its location and complexity.

In 2010, the alternatives in the

sitewide Feasibility Study were presented to EPA's National Remedy Review Board, which is a group of EPA's very highly technical staff that are experienced in these type of Superfund sites, review large and very complex Superfund sites.

The Remedy Review Board evaluated the appropriate remedy for the remainder of the site and recommended that EPA develop a new alternative that specifically addressed the principal threat waste at the site, which in this proposed plan is Alternative 4A, and we'll give you more detail as the presentation moves along.

In February of this year, the sitewide Feasibility Study was completed, and it developed and evaluated remedial alternatives, and these addressed Impoundments 3, 4, 5, 13, 17, and 24, the sitewide soils, and the groundwater.

Now, moving on to the content of

the impoundments, these impoundments, as mentioned before, were used as waste disposal or wastewater and sludge disposal. Contaminants in the impoundments include volatile organic compounds, which are better known as VOCs, semi-VOCs, and metals.

Here are some of the examples of these contaminants.

The contents of these impoundments have the potential to migrate into the groundwater or be released into the atmosphere through volatilization. However, due to their physical characteristics, these impoundments do not allow for the contents to be transported by stormwater run.

Now, for the sitewide soils, this includes the surface, the subsurface soils, as well as the site wetlands. These were impacted by past leaks and spills from the main plant, and contamination also includes VOCs, semi-VOCs, and metals.

Now, the potential migration of the contaminants in the soil have been greatly reduced by previous remedial activities at the site, such as clean fill and gravel and paving of some area within the main plant, a flood-control berm that surrounds the main plant, and the stormwater runoff is collected and stored in Lagoon 7 prior to treatment.

Now, for the groundwater, we have groundwater in the overburden and in the bedrock. The overburden groundwater moves vertically by the bedrock groundwater pumping and horizontally due to natural hydraulic gradients near Cuckhold's Brook and the Raritan River.

The bedrock pumping system at this site contains the majority of the groundwater contamination, and the recovered groundwater is treated at Somerset-Raritan Valley Sewerage Authority.

The groundwater is monitored as

part of the semi-annual monitoring program.

Now, again, contamination in the groundwater also includes VOCs, semi-VOCs, and metals.

Now, in the fall of 2010, Wyeth performed a sitewide inspection and observed groundwater discharges -- also called seeps -- from site banks into the Raritan River.

As a short-term solution, in February of 2011, Wyeth and EPA's Removal Program developed an interim plan which consisted of installing activated carbon-filled sandbags along the river at the seep discharge points.

The long-term solution was mentioned before. Wyeth entered into a legal agreement with the EPA requiring design and construction of a groundwater removal system, which consisted of a trench and containment wall, as you can see over here, and a groundwater treatment plant.

The water captured by the trench will be treated and then discharged into Cuckhold's Brook. And this is currently undergoing construction and is expected to be completed in spring of this year.

Now, for a brief summary of the risks. Let's start with human health.

Now, human health risk includes carcinogenic risks and noncarcinogenic hazards. A carcinogenic risk is considered unacceptable when a risk is greater than ten to the minus four, and a noncarcinogenic hazard is considered unacceptable when the hazard index is greater than one.

There have been three human health assessments at the site at different times, and they've all indicated that there are unacceptable risks for both current and future users.

Now, for ecological risks, there has been two documents completed. One was in 1992, which was the baseline

Endangerment Assessment. This was conducted for impoundments and soils in the main plant.

And the most significant potential exposure pathway identified involved aquatic biota, exposure to the Raritan River water, but the assessment concluded that the groundwater discharges are unlikely to affect the health and diversity of the aquatic biota.

In 2005, there was a Baseline Ecological Risk Assessment, and the BERA concluded that the habitats have been impacted, but the ecological risks were relatively low in the flood plain soils, Cuckhold's Brook, and the Raritan River.

Now, Impoundments 13 and 14 were not included in this 1999 BERA or the 2005 BERA because they were originally from Operable Units 1 and 2, and these have been suspended. And ecological risk assessments of these impoundments will be conducted during the remedy.

Now, for Part III, I give you to Joe Battipaglia, who will talk to you about the following topic.

MR. BATTIPAGLIA: Can you guys hear me?

My name is Joe Battipaglia. I'm one of the Project Managers at the site. I will be discussing the third and final part of the presentation, which should be about 25 minutes. And then we will open up for questions and comments.

The Remedial Action Objectives, or RAOs, are the goals to address human health risks and environmental concerns at the site.

UNIDENTIFIED SPEAKER: A little bit louder, please.

MR. BATTIPAGLIA: Is that better?

I'll start that one over.

RAOs, or Remedial Action Objectives, are the goals to address human health risks and environmental concerns at the site. RAOs were developed for principal threat wastes, impoundments, soils, and groundwater.

Now, principal threat waste is high hazard source materials that have a high risk to human health.

So, to summarize, the RAOs for this proposed plan are to treat principal threat waste, prevent exposure to soils and impoundments, and control and restore groundwater.

I'm going to skip this slide and move on to the next slide to explain how we develop remediation goals.

There are three types of impacted media at the site; impoundments, soils, and groundwater. First we'll discuss groundwater.

In order to meet the RAOs mentioned on the previous slide, remediation goals were developed for contaminants in groundwater using state and federal standards. So, for example, the remediation goal for benzene is one microgram per liter.

So, for soils and impoundments,

the potential exposures were divided into three categories for impoundments and soils.

The first category is areas requiring controls to prevent movement and exposure to principal threat waste. Areas requiring controls to prevent exposure to vapor or airborne contaminants is the second category. And the third category is areas requiring controls to prevent direct contact.

So, to address these three potential exposure pathways for soils and impoundments, remediation goals were developed using risk-based calculations, as well as using state and federal standards.

The light blue areas in this figure represent areas that require controls to prevent direct contact, which we refer to throughout this presentation as direct contact control areas. These direct contract control areas consist of approximately 190 acres of the site and are primarily in the main plant with a few areas in the flood plains.

The purple areas in this figure represent areas that require controls to prevent exposure to vapors. These vapor control areas make up approximately 66 acres of the site.

And, finally, we have movement control areas. The dark greenish color in this figure represents areas that require controls to prevent exposure to principal threat waste and movement of materials. These areas, referred to as movement control areas, make up approximately 38 acres of the site.

It is important to note that all of these areas -- direct contact control area, vapor control area, and movement control area -- all these areas will be confirmed with predesign sampling. So, if there are any soils that meet the definition of principal threat waste out in the white areas in the main plant, they be will addressed appropriately.

So, a number of technologies were identified and screened based upon their technical feasibility and their ability to meet the RAOs that I discussed earlier.

So, this slide shows a list of technologies that were screened and retained to develop remedial alternatives. The purpose of this slide is to show you that many technologies were identified and evaluated. These technologies were used to develop eleven remedial alternatives.

So, of these eleven remedial alternatives that we developed, the eight shown here were retained for further consideration. I'll discuss those eight alternatives in detail in the following slides.

The first, Alternative 1, consists of taking no action and is only used as a baseline to compare other alternatives.

Alternative 2 would take approximately thirty years to implement and cost about $33 million. It would only consist of groundwater monitoring and institutional controls, such as deed restrictions.

Alternative 2 and all the alternatives that I discuss in the upcoming slides include institutional controls and five-year reviews to ensure that the selected remedy remains protective of human health and the environment.

Alternative 3 would take approximately ten years to implement and would cost $138 million. And I'm going to skip to the figure to explain it further.

The direct contact control areas, shown in light green, would receive a 24-inch engineered soil cover to prevent direct contact.

An impermeable, multilayered, engineered vapor control cap, which would include a vapor collection and treatment system, would be installed over the vapor control and movement control areas, shown in pink and yellow.

A 24-inch engineered soil cover would be placed over the flood plain areas requiring direct contact control, also shown in light green in the flood plain.

Please keep in mind that all the caps that I mention in this presentation for this alternative and all the other alternatives that I discuss from here on out, all of these alternatives will include a drainage system and will be designed to withstand a 500-year flood at a minimum.

The groundwater remedy for all of the remaining alternatives is the same, so I'm only going to discuss it once.

The existing bedrock groundwater remedy, which will be the same for all the alternatives, the existing bedrock groundwater collection system would be improved through placement of additional extraction wells as necessary. And overburden groundwater will be collected and treated using recovery trenches, wells, or containment walls. And all of the groundwater collected, bedrock or overburden, would be treated.

So, let's move on to the next slide and talk about the details of some of the caps.

First, we have the soil cover system. For soils requiring direct contact control, an engineered soil cover system would be utilized. The soil cover system consists of a geotextile layer over the existing soils for stability, followed by eighteen inches of fill and six inches of vegetative soil.

So, let's move on to the vapor cap.

For soils and contaminants that

require controls to prevent exposure to vapors, a vapor cap would be installed over the existing soils, followed by a 24-inch layer of clean soil.

As shown here, the vapor cap consists of a geotextile for stability, an HDPE liner, which is a high density polyethylene liner, which is impermeable, so contaminants and rainwater are unable to penetrate it. HDPE is a very strong material that is resistant to chemicals and temperature variations.

The vapor cap also includes a drainage layer to help control runoff.

And, lastly, a vapor collection and treatment system, which is not shown here, would also be installed along with this cap.

And there is one more cap that is not used in Alternative 3 that I will discuss later on, but first let's move on to Alternative 4.

So, the blue text shown in this

slide shows the differences between Alternatives 3 and 4. The cost is a little higher, around $180 million, and the difference between this alternative and Alternative 3 is that the flood plain areas would be excavated and relocated to the main plant under an engineered soil cap.

Let's skip to the figure.

As you can see, this figure looks very similar to Alternative 3. The engineered soil cover and the vapor control cap would be installed over the same areas, shown in the light green and pink. The groundwater remedy would be the same.

And the difference is that the checkered green areas in the flood plain would be excavated and relocated to the main plant under soil cover.

Now, Alternative 4A, this is EPA's preferred alternative, which was formed based upon the recommendation of EPA's National Remedy Review Board. Alternative 4A would take approximately ten years to implement and would cost approximately $205 million.

Let's move on to the figure to discuss it further.

The direct contact control areas, shown in light green, and the vapor control areas, shown in pink, would be addressed in the same manner as Alternatives 3 and 4.

The difference is that movement control areas, which include principal threat waste, shown in yellow and blue, would be placed into Impoundments 3, 4, or 5.

Then the entire depths of these impoundments, which is approximately 36 acres, would be treated using in-situ solidification/stabilization, or in-situ S/S for short.

In-situ S/S involves mixing a binding agent, such a concrete, into soils and impoundments to solidify them and prevent contaminants from migrating. After the soils and impoundments are solidified, a vapor control cap would be installed, followed by the placement of a 24-inch soil cover.

For the impoundments in the flood plain, shown in checkered green, an Ecological Risk Assessment would be conducted to determine if excavation and relocation to the main plant is necessary.

And the groundwater remedy for Alternative 4A would be the same as for Alternatives 3 and 4.

So, let's move on to the next slide and discuss in-situ S/S a little further.

This is a diagram showing what in-situ S/S looks like. It involves using a large auger, which is typically three to twelve feet in diameter, which mixes a binding agent into the soils and impoundments. This solidifies the soils and impoundments, encapsulates the contaminants, and prevents them from moving.

A major benefit of in-situ S/S is that the air emissions are significantly lower because extensive excavation of contaminated soils is not required. So, worker and community exposure to air emissions are lower than many other technologies.

Solidification/stabilization is a proven technology that has been successfully used in Superfund, including several impoundments at this site. Particularly, solidification/ stabilization was successfully implemented for a portion of Impoundment 5, which contained tar-like materials similar to those in Impoundments 3 and 4, as well as the remaining materials in Impoundment 5.

So, as I discussed in the previous slides, areas requiring movement control would be solidified and stabilized.

The difference between the movement control cap shown here and the vapor control cap discussed earlier is that the existing soils and contaminant content beneath the cap would be stabilized to control movement to support the vapor control cap.

Like all the other caps I mentioned thus far, this cap would also be designed for a 500-year flood and would include a drainage system.

Alternative 5 would take an additional ten years to implement compared to Alternatives 3, 4, and 4A, and would cost approximately $308 million.

Let's move on to the figure to discuss it further.

The remedies for direct contact control areas, flood plain areas, and groundwater would be the same as Alternative 4. Like Alternative 4A, areas requiring vapor and movement control would be treated using in-situ solidification/stabilization, which is shown in the light blue on the figure, and it makes up approximately 73 acres at the site.

These areas would not receive a vapor control cap and would only receive a 24-inch engineered soil cover following treatment.

So, let's move on to Alternative 7.

Alternative 7 will take approximately twenty years, so ten years longer than Alternatives 3, 4, and 4A, and would cost approximately $825 million.

Let's move on to the figure.

The direct contact control areas, flood plain areas, and groundwater would be addressed in the same manner as they were in Alternative 4.

The difference is that areas requiring vapor and movement control, shown in blue and purple, which make up approximately 72 acres of the site, these areas would be excavated and treated on site using a combination of two technologies.

These materials would be excavated and treated using a combination of Low Temperature Thermal Desorption, or LTTD for short, and ex-situ solidification/stabilization.

LTTD, which is Low Temperature Thermal Desorption, is a technology that uses heat to physically separate contaminants from the excavated soils.

Following treatment, these materials would be placed in the on-site RCRA facility or would be backfilled on site and covered with a 24-inch soil cap.

So, finally, we move on to Alternative 11, which is the final alternative. It would take approximately 25 years and would cost approximately $1.8 billion.

Let's move on to the figure to discuss it more.

The areas requiring direct contact control and vapor control, shown in light blue and pink, and make up approximately 147 acres of the site, it would be excavated and treated on the site using a combination of LTTD and ex-situ solidification/stabilization. Treated materials would be backfilled on site or placed in the on-site RCRA facility.

Areas requiring movement control, shown in the light brownish color, which makes up about 38 acres of the site, would be excavated and disposed offsite for incineration or recycling.

Flood plain areas would be excavated and relocated to the main plant for on-site treatment using thermal desorption and ex-situ S/S.

A 24-inch soil cover would then be placed over all of the excavated areas, and the groundwater remedy would be the same as all the previous alternatives.

So, now that we've gone over all the alternatives, let's discuss how

EPA evaluates them.

So, as Walter mentioned, EPA uses nine criteria to evaluate the alternatives and select a remedy. The firs two are protectiveness of human health and the environment in compliance with ARARs or state and federal regulations.

These two -- these first two criteria are threshold criteria which must be satisfied. Alternatives that did not meet these two criteria were not retained for further evaluation in the alternative screening process. So, the eight alternatives I just discussed meet these first two criteria.

The next five criteria are balancing criteria which EPA uses to evaluate the alternatives that meet the first two criteria. These five criteria will be discussed in more detail in a few slides when we go over the comparison of alternatives.

And the last two criteria, state

and community acceptance, are evaluated in the public comment period.

So, using the first seven criteria, EPA developed a preferred alternative and presented it in the Proposed Plan, and that preferred alternative is Alternative 4A.

EPA believes that Alternative 4A most effectively meets the first seven evaluation criteria. This alternative was formed based upon the recommendations of EPA's National Remedy Review Board. It would take about ten years to implement and would cost approximately $205 million.

Let's move on to the figure and go over 4A briefly one more time.

A 24-inch engineered soil cover would be placed over the light green direct contact control areas and an impermeable, multilayered, engineered vapor control cap would be placed over the vapor control areas.

The movement control areas and

the principal threat waste, shown in yellow and blue, would be placed into Impoundments 3, 4, 5, and would be treated using in-situ S/S.

After solidification, a vapor control cap would be installed, followed by the placement of 24-inch soil cover.

For the flood plain impoundments, shown in checkered green, an Ecological Risk Assessment would be conducted to determine whether excavation and relocation to the main plant is necessary.

And, finally, the groundwater remedy would involve improvement of the existing bedrock groundwater collection system and would involve collection and treatment of overburden groundwater using recovery trenches, wells, or containment walls.

Let's move on to the next slide for a comparison of alternatives using EPA's evaluation criteria.

Here, we have a table showing a

comparison of the remedial alternatives against one another. Along the top, we have the remedial alternatives.

Alternatives 1 and 2 are not shown because they did not meet the threshold criteria.

Along the left side are seven of the nine evaluation criteria. The last two criteria will be discussed on the next slide.

So, the green dots on this table are used for when an alternative meets the specific criteria. Yellow dots are used for alternatives that meet the criteria but recognize that there are some significant challenges with meeting these criteria. And, lastly, a red dot is used when an alternative does not meet the specific criteria.

All of the alternatives meet the first criteria, protection of human health and the environment.

Alternatives 5, 7, and 11 meet the second criteria but there would be challenges with complying with ARARs, particularly with controlling air emissions within acceptable levels.

All of the alternatives would meet the third criteria, long-term effectiveness and permanence. And all of the alternatives would meet the fourth criteria, reduction of toxicity, mobility, and volume, with the exception of Alternative 3, which does not reduce the mobility of contaminants in the flood plain.

For short-term effectiveness, only Alternatives 3 and 4A would not result in impacts to the existing wetlands habitat, although Alternative 4A could result in some impacts to wetlands, depending on the results of the Ecological Risk Assessment.

Alternatives 5, 7, and 11 do not meet this criteria because their implementation timeframe is significantly longer than the other alternatives; Alternatives 5 and 7 would take 20 years, and Alternative

11 would take 25 or more years, versus ten years for the other alternatives.

For implementability, Alternatives 4 through 11 result in some form of invasive activity in the flood plain, which could delay the start of construction.

Alternatives 4 and 4A would require some predesign testing for in-situ S/S, while Alternatives 5, 7, and 11 would require more extensive predesign testing due to the use of thermal desorption, which could result in additional construction delays.

LTTD, used in Alternatives 5, 7, and 11, would also result in increased air emissions because excavation is required. The elevated air emissions may pose unacceptable risks to the site workers and to the community. Controlling air emissions within acceptable levels could be very challenging for Alternatives 5, 7, and 11.

LTTD is also not effective at

treating the full range of contaminants found at the site and would be highly prone to schedule delays.

LTTD was tested on Impoundment 3 in 2001, and it was not effective for the heterogeneous high moisture content material found in these impoundments.

In comparison to the other alternatives, Alternative 11 would generate the largest volume of truck traffic because it involves off-site disposal of a large volume of materials.

Under Alternatives 7 and 11, waste would be disposed in the outside RCRA facility. This facility may not have sufficient capacity to accept the waste and the waste may have to be shipped off site for disposal; therefore, Alternatives 7 and 11 could result in a large volume of truck traffic carrying contaminated material through the community.

And, finally, if you look at the time frame and cost, Alternatives 7 and 11 would take significantly longer than the other alternatives and their cost will be significantly higher.

Now, to move to the next slide, the last two criteria that EPA uses to evaluate alternatives are state and community acceptance.

EPA will seek state concurrence on the Record of Decision. Community acceptance is evaluated through our meeting tonight and throughout the public comment period. Therefore, we strongly encourage members of the community to comment on the proposed plan.

EPA may modify the preferred alternatives or select another response action based upon new information or based upon your public comments.

The Proposed Plan summarizes information from several reports which are included in the Administrative

Record in the Bridgewater Township Library.

Next slide.

Public comments will be accepted until May 15 -- not March 31 which is on the slide, so May 15 -- and can be submitted verbally tonight or submitted in writing via mail or e-mail. I have provided contact information for myself and Cecilia, the Community Involvement Coordinator.

We will address the public comments in the Responsiveness Summary and Record of Decision.

And I also provided EPA's American Cyanamid website, which contains more info and a link to the proposed plan. And the presentation, this presentation, will also be posted on the website soon.

So, thank you for attending tonight's meeting and listening through this rather lengthy presentation.

We'll up open up for comments

and questions, and I'll hand it over to Walter.

MS. ECHOLS: Before we open for any questions, we have some community leaders here tonight, and I just want to have you all acknowledge them.

Dan Hayes, he's the Mayor of Bridgewater.

(Applause)

MS. ECHOLS: Jim Naples, the Township Administrator.

(Applause)

MS. ECHOLS: John Schmitt, the Bridgewater Economic Development Commission.

(Applause)

MS. ECHOLS: Robert Albano, Bridgewater Steering Panel.

(Applause)

MS. ECHOLS: Michael Kerwin, Somerset County Business Partnership.

(Applause)

MS. ECHOLS: Ed Seliga, Somerset County Sustainability Commission.

(Applause)

MS. ECHOLS: Steve Tasher, Somerset Patriots.

(Applause)

MS. ECHOLS: Do any of you have a comment you would like to make about tonight's meeting?

Would you please come to one of the mics?

Please state your name so the stenographer can make a record of it.

MAYOR HAYES: Thank you. Dan Hayes, Mayor, Township of Bridgewater.

First, I'd like to thank everyone at the USEPA for holding this forum and allowing the perspective of effected Bridgewater residents and key stakeholders to be heard. Thank you.

This site has been designated as a Federal Superfund contaminated site for many years, and I am hopeful that the process that we are taking part in this evening leads us to the beginning of remediating the property and returning it to use.

My foremost concern is for the

health and safety of all Bridgewater residents. The site is located in our Binder neighborhood. It effects our homes, shopping areas, and recreational venues, including the ballpark of the highly acclaimed Somerset Patriots.

It is imperative that the site be remediated and that safety be a paramount concern throughout all aspects of the remediation process, including the site's alternate use.

The technical aspects of how the remediation of the property is accomplished will ultimately be debated and agreed upon by experts in the field under the watchful supervision of you, the USEPA. I have faith that you and those others will be diligent in this work and make certain that no corners are cut or shortcuts taken during the process.

I thank you for your efforts.

Since assuming ownership of the site, the Pfizer Corporation has demonstrated a sincere interest in working with the community. Pfizer has taken a site that they inherited through acquisition and demonstrated a willingness to invest significant capital resources immediately to begin the cleanup process.

We are eager to begin remediation and return the property to a purposeful use. The proposal the Pfizer Corporation outlined and presented to the USEPA, No. 4A, the implementation encompasses the safety, timeliness, and reused goals of the community -- and reused goals the Township holds for this site, and I recommend approval of the proposal for the benefit of Bridgewater and the surrounding community.

Thank you.

MS. ECHOLS: Thank you.

(Applause)

MS. ECHOLS: Please state your name.

MR. KERWIN: Good evening. My

name is Mike Kerwin, and I just want to echo Mayor Hayes' comments as well as add my own comments.

My name is Michael Kerwin, I am President of the Somerset County Business Partnership. The Business Partnership serves as Somerset County's Regional Chamber of Commence and we also partner with the Somerset County Freeholders to provide economic development services to our community.

Our mission is to lead the business community to a prosperous and sustainable future. We take the sustainability part of our mission very seriously. The Business Partnership supports sustainable economic growth that creates a foundation for job creation and economic prosperity.

Business decisions need to be based on careful balance of the triple bottomline; the environment, the economy, and the community. Decisions must be based on reason, not emotion.

We have a Sustainable Somerset Committee under the leadership of Chairman Ed Seliga, who's here tonight, that meets on a regular basis and deliver a program of work that benefits our members. Samples include the creation of the Green Design Tool Kit, the construction of buildings in the private sector, the first of its kind in New Jersey. We also work closely with Somerset Energy Council and support energy-efficient programs, as well as the U.S. Green Building Council, New Jersey Chapter, providing training for LEED Certification.

Our Sustainable Somerset Committee reviewed the Proposed Plan of the cleanup of the Cyanamid site on January 10, 2012. We offer the following comments.

We appreciate and support Pfizer's efforts to at long last clean up this site. The Business Partnership and our predecessor organization have been supporting the cleanup of this site for over twenty years.

We have seen more action towards achieving the goal of cleaning up the site since Pfizer assumed the control than in most of the prior decades. We want to see this momentum continue. We see significant risk to the community if the project is further delayed. The site has been under investigation since at least 1981. It is time for implementation.

Two, the Somerset County Business Partnership supports the implementation of remedial Alternative 4A as summarized in the EPA report. While we do not present ourselves as experts in the area of environmental cleanup, the Proposed Plan appears to us as a reasonable approach to cleaning up the site.

We note that no matter what option is considered, the site will require ongoing remediation for the foreseeable future; therefore, we are fortunate that we have a company with the resources of Pfizer to post the necessary guarantee to make sure that ongoing remediation will occur.

We do not see the environmental benefit of the more expensive options, but we do see considerable risk to cleanup workers and the neighboring community if the contaminated soil has to be exposed to the environment and transported off site.

MR. MUGDAN: Mr. Kerwin, if I might just ask you to wrap up quickly.

MR. KERWIN: Sure. One more minute and I'll be done.

We recognize the Proposed Plan is still conceptual and, upon approval, many details will need to be resolved and addressed.

We support the continued involvement of Crisis as the community watchdog to make sure that these concerns about implementation are addressed.

And, finally, while our primary

concern is that the site proceed to cleanup within a reasonable time, we also support the plans that give the community greater access to the Raritan River.

And we know there's a portion of the site adjacent to the Bridgewater Train Station that would be an attractive site for redevelopment.

We support the plan to open this area for smart development at some time in the future.

MR. MUGDAN: Do you want to leave the written?

MR. KERWIN: Sure.

(Applause)

MR. SELIGA: Good evening.

As Mike had mentioned, my name is Ed Seliga. I chair the Sustainable Somerset Committee at the Somerset County Business Partnership.

And I'll just summarize by saying we look for those opportunities to combine business activities with environment protection. And that's what appeals about the proposed remediation and restoration plan here at this facility and the site.

Our committee actually has a very extensive history with this property and with this site. We, in fact, participated at the early stage of remediation -- I believe that was 1992 -- and we participated in a meeting quite similar to this one in the same timeframe, '92, '93.

So, again, we find it very gratifying from a twenty-year perspective to see some significant progress and really movement toward restoration of the site, to actually return this property to a beneficial use.

To us, this restoration would be returning it to -- in a way that's completely protective of health and the environment. We're satisfied that we see that in the planning phase, that we would find suitable business uses for some portion of it that's being considered as part of the proposal.

And most significantly, I think, that we would eventually -- not necessary immediately, but eventually see the opportunity for some public green space with the kind of protective interventions that are proposed that would be suitable.

I look forward to being there at some point once that work is completed.

In summary, we do support Alternative 4A. We see it is protective of the environment, protective of human health, and achieves the benefits for the community that we're trying to accomplish.

I think we've discussed in our own committee in terms of -- we summarize this as: Clean it up and put it to use.

Very much in favor of that.

I actually didn't expect to have

the opportunity to make any comments, but I actually did have a question. I don't expect an answer immediately.

Any proposed time frame, where, perhaps, in a stage manner, when the phasing would be to return portions of the property to make it available for future uses, either business or public recreation purposes?

So, when?

You can tell me later.

MR. MUGDAN: The very short answer to that question is in the process we laid out earlier. We expect the Record of Decision to be made towards the latter part of this time of the year. We hope to get it done by the end of the summer, but, in any event, in that timeframe.

The next step is then for the remediation to be designed. This is a very complex process. Whatever of these alternatives is selected, it will take time to do design; probably, I would imagine, a couple years before work on one or another of the areas will start, might be a little faster. It will be phased, there will multiple steps going on simultaneously, and we project that the entire process will take about ten years.

It's conceivable that along the way some areas could be made available early, but I'm guessing that because there are so many pockets and so many parts of the site, that probably you won't really be able to reuse most of it for any kind of use, passive or active, for the better part of that entire period.

Maybe the flood plains earlier, I don't know. That depends a little on what choices are made about the flood plains.

MR. SELIGA: Thank you.

MS. ECHOLS: We have Senator Menendez' representative Carolyn Fefferman.

Do you have any statement for us at this time?

MS. FEFFERMAN: No, I don't, not at this time.

MS. ECHOLS: Okay.

Bob, one more second. There's a couple more people.

MR. SPIEGEL: Well, I represent. I'm a representative.

Don't I count for anything?

You recognized Crisis, you gotta recognize Edison Wetlands.

MS. ECHOLS: Yes, sir.

MR. TASHER: My name is Steven Tasher. I'm a member of the Board of Directors of the Somerset Patriots. I'm here to make a brief statement on behalf of Steve Kalafer, who apologizes for not being able to be here tonight.

We will be submitting more formal comments within the time period.

I think everybody in this room knows the integral economic impact the Somerset Patriots have had over the last twelve years. The philanthropy and the big corporate citizenship of the Patriots is well recognized. We've been a very important forum for the community, and particularly a forum for nonprofits and associations like the American Cancer Society, American Diabetes Association, Operation Shoebox, and others who have been able to come to the ballpark and present the importance of their organizations to the more than 5,000 people that have gone through the turnstiles at the Patriots Park, at the TD Ballpark, since it opened roughly twelve years ago.

The Somerset Patriots support an environmentally appropriate and expeditious remediation of the facility. We think that's very important.

We would ask that as the remediation is undertaken, that it be done in a way that recognizes and minimizes or avoids adverse impact or potential adverse impact upon the community. We think that's very important.

We have received assurances from the Pfizer Corporation. And I just want to most particularly compliment Steve Kemp and Russ Downey of Pfizer, who have been very, very great corporate neighbors to the Somerset Patriots.

They have provided a number of assurances that as the remedial activities are undertaken, that they will not impact, interfere with, or otherwise obstruct the operations of the Somerset Patriots and of all the surrounding neighbors.

We also have been provided assurances that any development that may take place at the facility, whether it's ten years from now, Walter, as you said, or a little bit longer or a little bit shorter, that those developments will also not impact or obstruct the operations of the Patriots.

We also want to compliment the county officials and the Mayor, who have been quite transparent. They've been extremely responsive and cooperative and engaged in this process, and we think that's very important.

We have one more request that we would like to make to USEPA.

As it makes a determination of its Record of Decision, we would ask that you consider appointing a liaison to the community; some individual, whether it's a Pfizer representative or some other representative, acting on your behalf to interface with the community so that as remedial activities are undertaken, that person will be available to all of us in the community, provide us with advance notice of activities that are taking place, and will also be available to the extent that there are problems or issues along the way, that that person can be available to help smooth any differences, resolve any issues, and will be a very important factor.

We are grateful, again, to Pfizer. They provide a number of assurances not only to the Somerset Patriots but to other members of the community, and we are absolutely confident that they will abide by those assurances so that they will minimize any potential adverse environmental effects or any effects on all of our businesses and our community.

So, thank you very much.

MR. MUGDAN: Thank you.

(Applause)

MR. MUGDAN: Here with us tonight are two Community Involvement Coordinators, Cecilia Echols and Melissa Dimas. We will always have a Community Involvement Coordinator that will be identified for this site. That person will fulfill the role that you've just requested.

And you'll also, of course, be

having a lot of opportunity to interact with the Remedial Project Managers that you've met here this evening.

MR. ALBANO: May I speak?

MR. SPIEGEL: Wait. I think I have the right to also speak. I've been waiting.

MS. ECHOLS: Bob, we have an order here. We have ---

MR. SPIEGEL: We asked if there was a sign-in sheet, and we were told there was no sign-in sheet for speakers tonight.

MS. ECHOLS: But this is -- how we're running it here, we're allowing the representatives of the Bridgewater community to speak first and make their statements.

MR. SPIEGEL: You have done everything you can to limit public input.

MR. MUGDAN: Sir, would you please go over there?

MR. SPIEGEL: You're limiting

public input here.

Who are you kidding?

MS. ECHOLS: No, we're not.

MR. SPIEGEL: Who are you kidding?

You are.

UNKNOWN SPEAKER: It's 8:30.

MR. SPIEGEL: It's 8:30, and you haven't let us speak.

MR. MUGDAN: There will be plenty of time for everybody to speak.

MR. SPIEGEL: He got five minutes.

UNKNOWN SPEAKER: You told us we gotta be out of here at 10:00.

(Pause in proceedings)

MS. ECHOLS: Could we allow him to speak, please?

MR. SPIEGEL: What are you afraid of?

MR. MUGDAN: We'll be hearing from everybody. And we have somebody here with an organization that has received a grant from EPA and has a formal role in this process. I'm going to ask him to stay with the same three minutes that we've asked everybody else to stay with.

Again, once we get through a first round, where everybody's had a chance to speak for that three-minute period, if there's time left over, we will be asking --

MR. SPIEGEL: That was way more than three minutes they just went over.

MR. ALBANO: Thank you very much. I appreciate the EPA and the work done by Pfizer.

And despite this recent --

MS. ECHOLS: State your name, please.

MR. ALBANO: Robert Albano.

I worked in Bridgewater for 32 years, back in the time when the site was an active, productive site. I've been a member of the Township Council for 24 years and involved with many of the major milestones at that site.

Currently, my involvement in the

site is as Chairman of the Bridgewater Steering Committee, working with the Cyanamid/Pfizer folks to have an effective, responsible cleanup at that site. Our representation of the community involves volunteers who are members of Crisis, which has been around watching the site for twenty years, when no one else was paying attention to it; of the Raritan Valley Sewerage Authority, who I consider a major stakeholder in this; Bridgewater Planning Board; Bridgewater Environmental Committee; Bridgewater Economic Development Commission; members of Bridgewater governing body.

We believe we have a very good feel into the importance of this site to the community, and we're dedicated to working with the Pfizer folks for a responsible reclamation of these extremely valuable lands.

Those are my comments for now. I reserve the right to speak again later.

I do appreciate the fact that everyone has come here. And although I sense there's antagonists, I hope it will be constructive.

Thank you.

(Applause)

MR. PETRAUSKI: Pardon me, you're going to hear from governmental officials first?

MS. ECHOLS: Yes.

MR. MUGDAN: We're going to hear from governmental officials first, then we'll open it up.

MR. PETRAUSKI: Well, then I guess that's us.

Hi. I am Glen Petrauski. I am the Executive Director of the Somerset-Raritan Valley Sewerage Authority.

As you saw in your presentation, we are the people that have successfully treated that groundwater since probably this facility was named to the Superfund list.

With me tonight is Jim Cosgrove.

He is a principal with Omni Environmental. He is the water quality consultant to the Authority.

Let me start off by saying we're very pleased to see this project is moving forward, but we really have some concerns.

And one of them is that though we've treated the water successfully for thirty years, and, matter of fact, it's a very large piece in the document talking about the millions and millions of gallons that have been remediated, I was shocked to find out two weeks ago, after discussions with Pfizer, that EPA and them in July made a decision to build their own treatment plant.

Well, that's fine. I just wish somebody would have talked to us. As what we consider a significant stakeholder in the water quality of the Raritan River, we found that absolutely shocking.

We are the folks who have spent

about $1.5 million since 1989 analyzing, monitoring, studying, modeling the river. As a matter of fact, it was our studies in conjunction with NJDEP that found there were problems in the river being caused by the contaminants that were escaping from the Pfizer site. And our studies in '08, '09, '10 have shown there is an impact on that river by the benzene which is being discharged.

Now, to go forward here, if Pfizer chooses to build a treatment facility there, that makes sense and I can understand the logic when you look at six pages of contaminants on that site. And we all understand that the movement in the environmental regulations today is to deal with the exotic contaminants and the contaminants of concern. So, we see the logic of the necessity for them to build a facility.

Where we have great concern is

that we found out on February 12, 2012, two weeks ago, EPA and DEP -- and Pfizer submitted an application to DEP for a permit equivalency for a NJPDES discharges surface water groundwater remediation cleanup Category BGR permit. And that permit is looking for, based on the very little evidence that is in the application to DEP, to have the standard set by 7:14, I think Subpart B.

We don't feel that is appropriate or protective of the river.

One, a general permit, considering the size of this site, the complexity, and the scope of the remediation of the groundwater, and, yes, the sheer increase in the volume of groundwater, which is going to go from 650, 700 thousand gallons a day to over 1.2 million gallons -- that's almost a 25, 26 percent increase -- you should not be using a general permit. It should be a specific permit.

More importantly, we believe that the permit should be based on effluent water quality standards, that you cannot just go out there and pick numbers off of a list on a standard document.

We will be submitting written comments on this, but due to the fact that we just found out most of this information -- and if it wasn't for Russ and his people at Pfizer when we spoke to them last week, we wouldn't have even had a copy of the Feasibility Study. We just got that Friday night.

So, we're very concerned and I would ask EPA to correct that and to please consider us a stakeholder in this.

At this time, I'm going to ask Mr. Cosgrove to fill in the detail -- not real long -- as to what our concerns are.

MR. MUGDAN: If we can keep it short, because we've already gone over the time.

MR. PETRAUSKI: We'll try.

MR. MUGDAN: I'll ask you to really keep it short here because I'm sure we'll be getting written comments from you as well.

MR. COSGROVE: Yes,sir.

My name is Jim Cosgrove, Omni Environmental. Let me just give you one example that I think will bring the point home.

One of the critical pollutants of concern on the site in the shallow groundwater is benzene. Benzene has been found as high as four hundred and some odd thousand micrograms per liter in the shallow groundwater. It's been found as high as thirteen micrograms per liter in the Raritan River itself.

The stream standard for benzene is 0.15. We're measuring 13, the standard 0.15.

The effluent standard that's

being requested for benzene for the Pfizer treatment plant that would treat this contaminated benzene in this example is seven.

What our concern is is that we don't want the discharge to be allowed to discharge, using my example, seven micrograms per liter of benzene when we have a stream standard of .15 and the stream is listed as being impaired for benzene, I believe, due to the contamination.

This is just one example. There are many other parameters, I won't take the time tonight.

We're totally supportive, I agree with the approach that's being taken in terms of the cleanup. The issue is let's just make sure we spend the time to get the effluent quality from that plant right so that we improve the Raritan River, rather than either allow it to stay the same or get worse.

Thank you.

(Applause)

MR. SPIEGEL: My name is Robert Spiegel. I'm the Executive Director of the Edison Wetland Association.

And I am a regional stakeholder, as are many people in the room. This is a regional issue, it's a regional problem. The chemicals that are discharging from this site discharge into the Raritan River and are a problem regionally. And as this gentlemen just said, the benzene alone is a major issue.

And since we went to the site with Pfizer, Pfizer has not necessarily been the most honest. It was only after we confronted them that they fessed up to their supposed benzene seed that was twenty thousand times the cleanup standard. And then that was found, and now the emergency measures that EPA is trying to take are being implemented.

Now, I'm going to keep my comments short because there's a number of people here.

I am completely against 4A as a remedy selection. EPA is taking a one-size-fits-all approach to this cleanup; solidify it, cap it, and leave it behind, okay?

What they should be talking is all of the above. They should be looking at all the remedies that they could possibly bring to bear on these various waste streams. And as they said, there's volatiles, semi-volatiles, metals, there's every chemical here known to mankind. And you can't just stabilize it and say: We're gonna make a big, giant piece of cement and leave it here.

Everybody remembers this. This was just recent. This was Hurricane Irene, this is the American Cyanamid site. This is what it looks like after you get some serious rainfall. And it housed, according to EPA, three hundred million gallons.

They're trying to tell us that

filling in the flood plain and putting a cap on it is not going to increase flooding.

Who do they think they're kidding?

Everybody in this room knows what it was like here just a few months ago, after Hurricane Irene. And EPA has the opportunity here to not only fix this problem and clean it up, but actually improve it and use it for additional flood storage to actually prevent additional flooding elsewhere.

And you think that you're gonna get this site back in ten years. This cleanup is not going to necessarily move forward on that timeline. Nobody knows -- I mean, you can't explain to me why it would take ten years to do the cleanup, why it would take twenty to really clean it up. Those timelines just don't make sense.

What they should be doing is seven or some version of seven with thermal desorption.

They came here and originally signed a Record of Decision way back when and actually was doing that and cleaning up the soils. Then all of a sudden, they stopped the cleanup in midstream, said: We'll be back and we're going to come up with a better approach.

Eight years later, they come back with this garbage and they call it a cleanup. It's the least cost for Pfizer, it's the least protective for the community.

And guess what, folks? Once they do this and walk away, that's going to be it. They're telling you: We're gonna monitor this site forever.

But guess what?

In Washington now, there's the right wing and others are trying to get rid of the EPA, and there's no guarantee that you're gonna have an EPA that's gonna have regulatory authority or funding in the future.

So, once they do this cleanup, if they do it, and once they walk away from it, there is no guarantee that you're going to get a cleanup here.

And look at this area. This is the site. This entire area is the flood plain, not just a small portion of it. Pfizer and EPA would like you to think that only a small portion is the flood hazard area.

And they're gonna build it to withstand a 500-year flood?

Are you kidding me?

How often does it flood in this area?

How often, every year? Every two years, it goes underwater?

And they're going to build it 500-year flood?

Good luck. This cap's gonna get washed away, washed downstream, and you guys better stand up and tell EPA and Pfizer they need to go back and re-think this approach.

And they should do this cleanup

in two to five years, not ten years, not twenty years. Clean it up. Clean it up for once and all. This has been here for over twenty years polluting the Raritan River and poisoning your community.

There's no reason you have to be left with this cleanup. This is ridiculous and it's an insult to Bridgewater, it's an insult to this area, and it's an insult to the folks that have been fighting to protect the Raritan River and the health of the Raritan.

So, I would ask you to please come up and comment tonight, put in your comments, and tell EPA and Pfizer to go back, come up with a plan that's quicker, that's more effective, and, most of all, that's permanent, which is one of their mandates. It's supposed to be permanent. A cap isn't permanent, it's an engineering control. All engineering controls fail over time.

And who's gonna be here to watch and make sure that gets done?

Who knows?

They can clean it up now and be done with it and then be done with it instead of monitoring it for the rest of our lives.

So, in the words of a famous poet, you know, he said: This just doesn't cut the cat.

You know, this doesn't pass muster. When you look at it and you look at what they're planning to do, they're gonna spend $200 million. $200 million.

And what are they gonna get?

A piece of stone sitting in a flood plain.

How is that gonna help you?

It'll help Pfizer's profit, it'll help Ian Read's profits, whose the CEO of Pfizer.

By the way, Pfizer is, I think, one of the largest biopharmaceutical companies in the world. They have the resources to clean up this site.

Please make sure that they do.

(Applause)

MR. CHAPIN: My name is Rich Chapin. I'm a consulting environmental engineer. I started to review the Feasibility Study on behalf Edison Wetlands. We will be presenting technical comments, but I'm here to pass a few preliminary technical comments tonight.

This site is adjacent to the Raritan River. In all the documents, there's this historical construct of flood plain versus main plant area. They built a flood wall around this facility back historically -- I don't know if Calco did it or Cyanamid did it; one of them did it -- to keep out the flood waters.

But the reality is the entire site is a flood plain, and we can't technically look at the site artificially as outside the wall being flood plain and inside the wall, the main plant, not being flood plain. You can't look at it differently. It's just all flood plain.

That's the first technical comment. The whole approach needs to be re-thunk of it all being flood plain.

The proposed remedy, if you total up the volumes that are used in the cost estimate, will place some 600,000 cubic yards of fill in the main plant area. That's 600,000 cubic yards of fill in the flood plain.

I understand that there's equivalency of permits. You need a permit to do this. We called the DEP to get the permits, to see what they said. We were given two permits, both of which talk about excavation of materials outside the wall, bringing them inside the wall. There's nothing in the permits that we saw about placing 600,000 cubic yards of fill in the flood plain.

The FS also states: We have the

permits.

So, there's a dichotomy here that needs to be investigated because I didn't find a permit for 600,000 cubic yards of fill, and that needs to be addressed.

On that same amount, 600,000 cubic yards of fill, if you use the number for density of material that they use in their cost estimate, which is 1.69 tons per yard, translates to 960,000 tons of fill being imported into the site.

Well, for a typical 20-ton truck, that's 48,000 truckloads of fill that are going to come from in the community, into that site. And then there's another 48,000 trucks that are going to drive back out.

That is a short-term adverse impact, an implementability factor that is not addressed at all in the feasibility study, and it must be.

I suggest looking at rail transport of any materials in, but that needs to be addressed.

The last comment -- not the last, second to last.

Another major Superfund site, such as Ventron/Velsicol up in the Meadowlands, the principal threat wastes were removed and then the site was stabilized and capped for redevelopment.

Here, we seem to be stabilizing all the principal threat wastes. I think that needs to be re-thunk. And if there are testing that needs to be done, to make sure we can do it, because you're talking about using cement to make a solid block out of an organic tar. I don't want to bore anybody with chemistry, but sometimes those things are difficult to effect.

So, I think that needs to be tested. Before you select a remedy, you should be sure that it's going to work.

I understand we're twenty plus years down the road on this project and everybody wants and deserves as expeditious a cleanup from this point forward as we can, but it's better to know what's going to work now than to pick it, to start it, and then, as the past Record of Decision, you picked something, you went to try it, it was like oops, and then they had to re-think the whole entire process, and that's why we're here today. So, I suggest that you take a look at that.

The other item that I'll add is the Impoundment 8 facility. Impoundment 8 is a RCRA-permitted landfill. It's designed to hold the nasty stuff that's still there.

In the selected alternative, I didn't find any use of that facility to minimize the amount of fill in the flood plain. If the facility is there and its purpose when it was built was to contain wastes from this site as the cleanup goes forward, its use should be maximized in any alternative selected.

As I said, thank you. There will be other technical comments that we'll submit.

MR. MUGDAN: Thank you.

MR. TITTEL: Hi. I'm Jeff Tittel, Director of New Jersey Sierra Club. We have about a hundred members here in Bridgewater, so I guess we are a part of --

MS. ECHOLS: Sir, who are you again?

MR. TITTEL: Jeff Tittel, T-I-T-T-E-L, Director of New Jersey Sierra Club.

MS. ECHOLS: Thank you.

MR. TITTEL: We are involved in Superfund issues, not just here but all around the state and the country.

I want to say one nice thing. It's nice to be at a meeting where officials of government call the polluters Responsible Parties, versus the DEP, where they're now customers, so...

There's only a few people who

get that. But dealing with DEP now --

UNKNOWN SPEAKER: We can't hear you.

MR. TITTEL: Sorry.

I said it's nice to be in a place where polluters are called Responsible Parties versus at the DEP now where they're called customers because of the changes that's happening in the state.

I just want to start out with a couple of points. And it's interesting 'cause one of the alternatives that you discussed, 7 and 11, you talked about air quality impacts, but, yet, if you're going to be bringing in fill to a site, there will also be impact. So, 48,000 trucks bringing in dirt would also be 48,000 trucks taking out the toxic waste. So, that, in itself, I think, needs to be looked at.

The other real concern that I have is that when you cap in flood plains and areas that see systemic flooding and flooding that's getting worse -- what was once a hundred-year storm probability is happening every two years, and some years more so, and what's the probability of a 500-year storm may happen next week -- it's a real concern that how do you armor plate a site to do that?

Anything that's in the flood plain needs to be removed, whether you take it to the RCRA site or something else because if you cap in an area where you can get scouring, you can get lift. This is illuvial land, so you're gonna have groundwater pushing up as well, you're gonna have movement, and you're going to have a failure of those institutional controls at some point. And I think that's a real concern, especially in the flood plain.

In the other areas, slurry walls and other things could work, especially if they're armor-plated, like bentonite, so that you're not gonna get the flood water in or groundwater out, and I think that's something that needs to be looked at in a lot more detail as part of this.

And I understand the problem that you have here. I mean, you have so many different types of contamination, from metals and VOCs and everything else, that this is really a time bomb and you're trying to diffuse it. The problem is that unless you move quicker, that bomb can go off; unless you deal with other issues that aren't even on the table today, like Lagoons 1 and 2, which are six million gallons of toxic waste sitting there, ready to go off at some point -- the next great flood, the next whatever -- you're gonna have a real serious problem, a bigger disaster than anything you've seen on this site since or can see in the future.

And a concern that we have is that the Raritan River, it is a used river. Downstream, there are still backup water supply intakes and water supply intakes as far south as New Brunswick, the canal. You also have recreational use, you have people wanting to live along the river.

So, cleaning up this site and putting it back to productive use is important, but productive use doesn't mean leaving toxic waste under a cap that could leech out at some point.

You know, I coined a phrase "pave and wave" a few years ago. My concern is that this is going to be pave and float and you're gonna see when you go kayaking in this river chunks of the cap going past you and chemicals coming out.

And I'm also very concerned that any discharge from the site meet all surface water quality standards because I think that's also critical.

I just wanted to end with one thing for EPA to understand. To EPA, it means that even Pfizer is accountable, so keep them accountable and make this site clean up properly.

Thank you.

MR. MUGDAN: Thank you.

(Applause)

MR. MUGDAN: I see we have a couple people coming down at the same time. Why don't you just take a seat right there, and we'll go back and forth on the mics.

MR. WHEELER: David Wheeler, I'm with Edison Wetlands Association.

We're talking about flooding here with this plan and with this site, and I want to kind of put that into real terms.

That flooding, I walked through the downtown communities right after the two storms last August; walked through Manville, through Bridgewater, through Bound Brook, and Middlesex Borough. And the real destruction from those floods was right out there on the curbs of people's homes, one after another, block after block, entire neighborhoods, where if you walked or drove through that, you would see entire lives put right on the front yard, right up to the curb, piled up high like mountains.

That's the flooding that we're dealing with in this area right now. While this plan is being proposed here and the EPA wants to do this plan, at the same time we have the Army Corps of Engineers working with all these other government agencies to build huge floodgates in these towns, to build giant flood prevention walls, and everything they can come up with technologically to keep the flooding out of these towns.

Meanwhile, we're going to displace all that water that you see from the picture that literally covers the site. And, also, a few speakers have mentioned the Raritan River and Canal. The Delaware & Raritan Canal is a drinking water source. And with those storms, the water completely covered everything from the lagoons on site, across the Raritan, right into the canal, all one water body for a long period of time.

So, everything that's done on the site should be geared not just towards the contaminants and remediation, but should also be geared towards the flooding, towards whatever could be done to prevent flood damages, not make them worse.

So, I strongly urge you to reconsider and to think about the fact that this is, like it was mentioned, all one big flood plain, not compartmentalize it and say some of it's okay, some's of it's not. It's all flood plain.

Thank you.

(Applause)

MR. MUGDAN: A number of people have mentioned flooding. There will be more people who will talk about it. We do have a number of slides to address some of the concerns about flooding.

However, what I'd rather do at this moment is just keep the statements coming.

(Applause)

MR. MUGDAN: And we may find some time to share that with you. If we don't find time to share it with you this evening, this presentation, I take it, that we've given tonight will be on the website.

Is that correct?

MS. ECHOLS: Tomorrow.

MR. MUGDAN: That will include the additional slides that we didn't go into but that we have on this issue.

Well, we'll figure out some way to get it out to the public.

MR. GERMINARIO: Good evening. My name is Tom Germinario. I'm the technical advisor to Crisis, which is the local community group that has been monitoring the cleanup of this site since 1993 under a technical assistance grant.

The comments I'm going to make are based on my review of the sitewide feasibility study on behalf of Crisis.

We're dealing in part with the cleanup of six impoundments, 3, 4, 5, 13, 17, 24. We note that with respect to the Impoundments 3, 4, 5, the wastes are very heterogeneous, meaning that they're made up of a wide range of contaminants with a wide range of characteristics.

This poses particular treatment problems. Based on our experience with the site, we favor treatment technologies that have been proven and that are reliable and that can be implemented within a relatively short period of time.

From that perspective, we do endorse Alternative 4A that is being recommended in the FS and in the Remedial Proposal of the EPA. That alternative principally relies with respect to the impoundment materials on in-situ stabilization/ solidification.

We are recommending, however, that during the remedial design phase, that there be pilot testing of the impoundment material in order to optimize the type of S/S, solidification/stabilization, that is used, and to optimize and find the most effective combination of amendments, stabilizing agents, and geogrids that can be used in connection with the S/S process.

Regarding Impoundments 13, 17, and 24, we recommend that the material in those impoundments be classified in the same way as the general site soils are being classified in the three categories -- those require contact control, vapor control, or movement control -- and that those materials requiring any one of those three types of controls be removed from the flood plain, brought to the main plant area, and handled in accordance with those three categories, under either the engineered covers or under the in-situ stabilization and solidification process.

Principal threat waste, no matter where located in the site, should all be consolidated in the Impoundment Areas 3, 4, 5 and subjected to the in-situ S/S treatment process.

With respect to sitewide groundwater, Crisis generally endorses the approach that EPA has recommended. We do have reservations, however, with respect to reliance on the Somerset-Raritan Valley Sewerage Authority Plant.

We have seen no evidence in the record that that plant is capable of treating this range of pollutants that is present on the site. We recognize they have been treating bedrock groundwater for a number of years, but that is at a much lower level of concentration than what we're going to see in the coming phases of groundwater recovery on the site.

We very much favor and recommend the construction of a specifically designed on-site wastewater treatment plant specifically geared towards the contaminants found on this site.

And to the extent that the SRVSA must be used on an interim basis, we strongly urge that there be imposed enforcement level effluent discharge standards for all of the range of contaminants, SVOCs and VOCs, that are going to be treated at that plant on an interim basis.

With respect to the other alternatives, we do not believe that LTTD is a technology that will effectively deal with this type of heterogeneous waste.

We also note that LTTD is primarily geared toward a soil-type of treatment and requires a fine particulate consistency of the treated material, whereas the impoundment materials here are highly plastic foreign materials and it would require extensive processing of that material even to make it and handleable, if you will, by an LTTD process.

And, also, because of the heterogeneity, there's a wide range of temperatures that would be needed to remove or resorb the contaminants here and would be difficult for the LTTD process to deal with that.

We also note that that process would take an implementation period of twenty years, which is double what the Alternative 4A would require.

So, just to sum up, we are conditionally endorsing Alternative 4A. The issues we would like to see addressed in the Record of Decision are as follows.

Long-term groundwater treatment should rely on on-site treatment designed specifically for the site's contaminants, not on SRVSA's municipal treatment system.

Secondly, interim groundwater treatment at the SRVSA should be subject to enforceable effluent limits for VOCs and SVOCs.

Third, materials in the flood plain requiring direct contact, vapor, or movement controls, should be relocated to the plant area and treated with appropriate engineered caps and/or in-situ stabilization/ solidification.

Fourth, all principal threat waste on the site should be consolidated in Impoundment 3, 4, 5 for in-situ S/S treatment.

And, lastly, bench steel testing should be conducted during the remedial design phase to determine the most effective combination of amendments, stabilization agents, and geogrids to be used in the in-situ S/S process.

Those are my comments. Thank you very much.

And I do have a written version

I'd like to give you.

(Applause)

MR. BOYLE: My name is Ryan Boyle. I'm an environmental science student at Rutgers University and I'm also a resident of Bridgewater for the majority of my life.

I think the greatest concern so far of everyone in this whole lecture hall is that we really want to see treatment. We really want to see the contaminants eliminated rather than to be contained. And looking at all the different options that you guys have proposed, all I really see for the most part, for the vast majority of the contaminants, is a practice of containing them.

And one thing I feel that has been failed to be looked at is specific bioremediation products; specifically, ones that contain microbes, surfactants, and various enzymes.

In my studies at Rutgers, the

focus of my studies have been towards soils and contaminants in those soils and how we eliminate the contaminants in those soils. I'm still pursuing my degree, but I have been networking, I have contacted many individuals, one of which is the President of Alabaster Corporation in Pasadena, Texas.

I provided -- I'm not too sure what's his name there -- a business card with his personal cell phone on it. And his products will take care of -- specifically, the main -- the original purpose of the creation of his bioremediation products are for hydrocarbons, which the majority of the contaminants in question are hydrocarbons, whether tar-based or in more of a liquefied form. They're geared towards handling those contaminants.

VOCs are also specialized as the products go, and, I mean, I see chlorinated hydrocarbons, PCBs, he has products that he reassures me will take care of these contaminants.

And if we can eliminate the contaminants -- and he's also specified that in comparison to the excavation of soil that's regularly practiced to a cradle-to-grave technique, that his products can eliminate contaminants, eliminate the liability that Pfizer has on those contaminants, at a less expensive cost than the practice of cradle-to-grave.

Now, I understand, okay, we're not completely dealing with cradle-to-grave. We are relocating some soils and we're just implementing a cap, a clay cap.

But with all the different discussions, with all the different topics brought up by various members in the audience, and with the strategy that you guys are implementing, I'm sure that a combination of all these tactics and, you know, talking with the President of Alabaster Corp., that a much more effective, reasonable treatment method could be established.

I mean, the treatment facility that Pfizer implemented for the groundwater is contaminated. That was pretty discerning. I was expecting a little more from that.

But everything else, I firmly believe you guys really are trying your best in trying to come up with the best treatment. And if everything is taken into consideration that's mentioned today, I'm pretty certain that we'll come up with an effective strategy.

But the -- there's so much stuff I want to talk about.

One of the other concerns, one of the strategies for the volatile organic compounds was to put it into cement where you're still having to put a clay cap over it to reduce it.

The products in question that I'm discussing, as soon as they're treated, as soon as the product is applied, all volatile organic compounds will no longer emit hazardous emissions. They will be dealt with immediately. That's how effective these products are. We're talking about a treatment of a matter of months once its applied to the soils in question, rather than several years.

Now, you know, preparing the soil, yeah, it's a time-consuming process, but once it has been thoroughly mixed in with the soil that's going to be treated, that will take care of that problem.

The only other thing that, of course, the product will not take care of is the heavy metals. But as we discussed, there are other viable methods of dealing with those.

Thank you very much.

(Applause)

MR. ARCOLEO: My name is John Arcoleo, lifelong New Jersey resident, resident of Bridgewater for twenty years, and I'm Environment Trustee of

Sunset Lake Community in Bridgewater, which helped supply 20,000 cubic yards of fill dirt for the first round of capping in the mid nineties. And we'd like to thank American Cyanamid for helping us out like that in the past.

I want to go back to my early college years back at Rutgers as a chemistry major. And some of the chemistry majors, we'd sit down at dinnertime after chemistry lab and wonder why after spring rain the New Brunswick drinking water tastes like the chemical reagents that we were using in the labs: Boy, that water tastes like phenylsilane. Why would that be? What's the water purification process?

It's obvious now that the American Cyanamid site has been leaking organic chemicals, volatile chemicals, for decades, and, under any proposed remediation plan you have now, will continue to leak the volatile organic compounds. It is obvious that any engineered solution will fail at some point.

Let's look at that picture over there. The entire site is under seven feet of water. It's very obvious that the last hurricane, Irene, had a fraction of the rain of the previous hurricane in 1990.

I don't remember what that hurricane was called.

UNKNOWN SPEAKER: Floyd.

MR. ARCOLEO: Hurricane Floyd, that had thirteen inches of rain.

And I just was very curious, I went down to Van Veghten House after Hurricane Irene to see what it looked like. And if anybody wants to go see a nice flood plain, we're just off to the right of that picture there that you see over there. The curator at Van Veghten House said: Oh, yeah, the flood plain, you know, it's normally getting up about six inches of Hurricane Floyd's height.

He showed me the high water mark

where Hurricane Floyd was right up to the Van Veghten House. So, any five-, six-inch rainstorm is going to innovate Pfizer plant to that level, especially since the Army Corps of Engineers' Bound Brook floodgate project was very successful. Bound Brook was almost totally immune to Hurricane Floyd.

It's just I feel sorry for people in Manville. They seem to have gotten a record flooding because water's got to go somewhere, and if it ain't going to Bound Brook and if it ain't gonna go to American Cyanamid's proposed concrete sarcophagus of 600,000 cubic yards, it's definitely gonna go to Manville, the flooding.

So, you have major practical concerns there with the flooding issue that you have to deal with if you're gonna fill a flood plain. I don't know how New Jersey State DEP -- oh, they're still here, okay -- how they're gonna approve filling in a flood plain and causing egregious flooding elsewhere.

I'm really, you know, not impressed with the proposal as it's written.

These volatile organic compounds have to be handled on site and disposed of, whether it's -- I don't know, I also have a Ph.D. from Columbia in biology, and I remember sitting in my freshman -- first year of grad school listening to the health safety officer at Columbia-Presbyterian Medical Center saying that if you had some hazardous creation that had to be dealt with and disposed of, he said, dilution is the solution, was his answer. He'd say poor enough tap water, get it into the Hudson River at a low enough concentration level so that we wouldn't have to worry about reporting it to any government entity.

And it's clear that seven parts per million benzene, you know, contamination that you're allowing Pfizer to put down their wastewater, dilution is the solution is the plan for Pfizer.

Because it's cheap. They have record profits. They don't want to spend any money here. They just inherited this nightmare.

But you have to deal with it. Simple as that.

I appreciate your time.

Also, as Sunset Lake Environment Trustee, I get to supervise the dredging project every ten to twenty years. And if you need clean fill dirt to a large degree, we have it, and we'd be glad to talk to any stakeholders in this process.

Because of the minor asphalt milling problem, we had to truck a hundred truckloads out to Ohio. It cost us $232,000. We'd like to see a more cost-effective method of disposing of our New Jersey soil which is perfect except for that one part per million benzo. And that's another crazy standard I would like to get into with DEP later.

Thank you.

(Applause)

MR. ADEWUNMI: My name is Wale Adewunmi. I'm a resident here. I'm also an environmental scientist.

So, I do understand what you guys are in for. I really pity you because you're between a rock and a hard place.

But nevertheless, as a resident, I am concerned by some of your tests and studies that you have done. And I want to encourage you or urge you or make available your data from some of these studies.

Several people talked about the flooding. I was here when Hurricane Floyd hit this area, and, of course, also Hurricane Irene. The drinking water supply system is nearby. It's one major system.

Now, I'd like to know if there

was any monitoring during this period. I'd like to see what the data looks like. I'd like to know if there were subsequent cooperation between EPA and all the different stakeholders and New Jersey American Water.

I think it's going to be encouraging if you make those type of data available rather than just written in a public release that the public is not effected. Well, that's conflicting to me, but I'd really prefer to see what your data looks like. It's not an indictment, it's just much more satisfying.

Also, when construction begins and the work that's been done so far, you do understand that there is potential for aerosol, for dust. And people live within concentric rings of this particular area. I don't know if your baseline Endangerment Assessment includes this. If you have any data on that...

You can see people come to the

shopping complex and they leave for whatever amount of time, but people live permanently within certain radius, even though it changes as you move further away.

But I wonder if you have any data or if people living in that area are really in danger of any sort of problem down the road.

Thank you.

(Applause)

MR. BATTIPAGLIA: Just to address that question quickly, we do have a plan under EPA review right now to conduct air sampling, baseline air sampling at the site.

MR. MUGDAN: That would be around the entire perimeter of the site.

MR. SIVAK: Any construction activities that we would engage in and we would implement, we would develop air monitoring safety plans specific to those activities as well.

MR. WOLFE: Just to jump in on

that question within a question for
your question --

MS. ECHOLS: State your name.

MR. WOLFE: My name is Bill Wolfe, W-O-L-F-E. I live in West Amwell Township in Hunterdon County.

One of the criteria you rejected, some of the more elaborate, costly cleanups was on the basis of air emissions.

Do you have current air emissions from the site?

Do you have monitoring data from what's coming off the site now?

MR. SIVAK: We're collecting data right now as part of the removal action, and then we have this plan in place to collect the baseline data. So, as we move forward --

MR. WOLFE: How do you know if the increment is going to be greater or lesser?

You can have a situation where your current emissions may be reduced with your excavation and hauling off site. You don't have a baseline to compare it to. So, it seems odd to me that you're dismissing a remedial alternative on the basis of purported impacts from trucks and from DL emissions from the excavation.

Am I understand that correctly?

MR. MUGDAN: We understand.

MR. WOLFE: Okay.

Anyway, I came here basically to listen to the presentation -- it was a little too lengthy for my taste -- and to listen to the local concerns from the people who live here and have had to deal with this site for the past hundred years. This a site that's been poisoning the Raritan River and the surrounding region for basically a hundred years.

It was identified as one of the worst sites in the country in terms of not only the magnitude of the risk and the contamination coming off the site but in terms of management of the site by the State Department of

Environmental Protection.

EPA's Inspector General issued a national report looking at what were called State-lead Superfund Sites and recommended that EPA take back control, lead control, of this site from the State.

So, there's been, you know, the history of the site and chronology, we see some serious mismanagement, some serious lack of progress on cleanup. So, that needs to be a backdrop to what we're talking about, just to set the record clear.

The other thing is I live in Hunterdon, just off the Delaware River. And one of the rationales for the Crown Vantage Landfill, which is right along the river, similar but not as -- frankly, not as flood prone as this site, was that scouring from flooding would take the buried drums and chemicals and materials down the river. So, the whole rationale for the cleanup, which was primarily excavation, was the flooding risk.

And in this situation, it's obvious that you have much more dramatic risk due to flooding and that the only criteria that they're really looking at is cost. So, you're getting a very half-assed remedy and the cost factors are really driving that choice.

And that, for the community, the people in the community, and the community preference, it actually should be stated clearly you don't like the way they balance the issues of remediation versus cost and your health and the quality of the river and the regional water supply and a whole set of other things are directly relative to that. So, I would urge people to get on that and submit written comments and hit on that point.

One other concern I want to raise, leaving material in the flood plain is crazy, and there should be a maximal effort to excavate and offsite dispose versus treat and contain and cap on site. And I see it's exactly the opposite. I think they're trying to -- again, it's a cost issue.

There's a bunch of regulatory issues I'll submit written comments on, but I was really surprised to hear that the applicant, or Pfizer, has submitted a permit application for NJPDES permit without effluent standards and it's a general permit and it's going to be implementing your remedy. I don't understand that at all.

You've got effluent standards, you've got Clean Water Act, which is federally enforceable and should be not just an ARAR but because New Jersey's water quality standards are federally approved, you're bound by them as well. It's not an ARAR, it's a federal requirement. So, I would urge you to look at that.

And last thing, the baseline

ecological evaluation, no biota, no toxic effects, no diminution in healthy aquatic communities in the brook, in the river? I just find that not credible and would ask that those findings and that assessment be reviewed by U.S. Fish & Wildlife Service for the science and the scientific basis for those kind of conclusions, because I can't imagine that the concentrations of toxics that are coming off that site, including metals, are not effecting the biota in the brook and downriver.

Thank you.

(Applause)

MR. SODIE: I'm Walt Sodie, the Executive Director of Crisis.

I'm not going to address much more on the technical points of our position that Tom Germinario, our technical advisor, spoke to you about.

But I'd like to ask if -- there are further things that I am going to address concerning some of the other comments -- after I speak, if you might give Tom another minute or two if he wishes to come back up.

MR. MUGDAN: I'd like to keep it going and give other people an opportunity. I understand your question, but I'd like to make sure everybody has a chance.

MR. SODIE: I have to say that I do appreciate Bob Spiegel's passion and the Edison Wetlands' input on this project. If nothing else, it's helped to keep us on our toes.

But Bob and I have communicated on some of this, and some of the remedies that Bob and other people have spoken on his behalf tonight have suggested really don't seem to be supported by what we can document in terms of the evidence; particularly, the low temperature thermal desorption.

Crisis signed off in the 1998 round at a public hearing just like this one on a variation of this.

Couple years later, we were told it was impractical to implement at the site. Now, technology has advanced beyond that point, admittedly, but we have -- and I'm going to alter my statement and we'll submit this after tonight.

MR. MUGDAN: Okay.

MR. SODIE: Some of the comments by Tom Germinario in response to the low temperature thermal desorption, because of the heterogeneity, the difference in the makeup of the waste characteristics in these impoundments, that that process is not really geared to address or remediate that type of waste, that variety of waste.

Bob, if you have engineering studies -- I know you're still working on things -- you can come back with and show us where we're wrong on that, we'll reconsider our position.

The same is true on the comments that I believe Mr. Boyle made on bioremediation. That was the other big element in the 1998 Record of Decision. It took six years for EPA -- DEP, actually, was in the lead at that point, to come back and tell us: Not workable for this site.

If there's been some change in that, we'll take a look at it because I think, as most people who have been working on this project for a while know, this is not the end. What's happening tonight and what's going to happen in the public comment period up to May 15 is not going to be the end of this. There's going to be ample opportunity for input later; we get the Record of Decision, the Remedial Design plan, implementing the Remedial Action plan.

These things are going to be difficult enough in themselves. We've dealt with this project long enough that we think we know how we're going to continue interacting on those projects and to be an effective voice in terms of a voice of the community.

What worries us more is what I'd like to refer to now as the intangibles on this project. There are two of them I'm going to refer to. And EPA and Pfizer may not be real happy to hear all of these things, but I think they have to be said.

It's been fourteen years since we've had a hearing like this. The first six were spent trying to implement the 1998 Record of Decision. It didn't work out. I'm not holding any of you from the EPA who are here tonight responsible for that.

In fact, the people we've worked with most directly, Mark Austin is there, Angela Carpenter is there, Cecilia Echols, we've had very good response and very good results when we've had to interact with them.

Where it gets into this intangible factor that I'm talking about is when things start to go deeper into the EPA bureaucracy. That's where we end up with interminable delays.

At one point, I believe, if I'm not mistaken, it was on the first iteration of this sitewide Feasibility Study that came up after 2005, in 2007, where we had to wait for comments. DEP was still in the lead. Everybody else had their comments in and we had to wait for six months for comments from the EPA.

Again, not the fault of the people we work with directly.

The problem I fear is there are many instances when EPA has not developed or has not dedicated the proper resources to this project. I hope that's been corrected now. I have yet to be told it has been.

And there are times when one part of your bureaucracy does not know what the other is doing. That was illustrated most vividly recently to me in what I found very early -- actually, it was late 2011, that the Raritan River had been declared impaired for benzene in 2006 at the Queensbridge Testing Station in Bound Brook, a little more than a mile downstream from this site.

I thought my gosh, it's been five years since that happened? It was December of '06, exactly five years. I've got to be the only guy in town that doesn't know about this.

Well, surprise. I'm not going to name names -- because I was personally embarrassed that I didn't know -- people from the EPA who were on the frontlines at the remediation part of this didn't know because the DEP did, strangely enough, what was required of it.

You want to know what was required?

They published the findings in the New Jersey Register and they put notices, legal notices, in some daily newspapers.

Anybody here read the New Jersey Register or the legal notices?

DEP had to send that -- DEP, obviously there were people in DEP who found out about that who knew that we were involved and other people were involved in this remediation. They should have gone beyond what was required of them and let us know that that was the case because if that happened, we would have pressed much harder for additional testing in the river and Cuckhold's Brook than we did. We pressed as it was, but we would have pressed a lot harder.

MR. MUGDAN: Can I ask you --

MR. SODIE: I'll try to wrap up.

We know the Superfund regulations, CERCLA, RCRA regulations, are very burdensome, and you have to deal with them. But we're asking you, if you can, as we move this project forward, to please try to work within those regulations to get more speed out of this project than you've been able to get up to now. I agree with some of the comments that have been made about this has to be moved along faster.

And our group is going to be watching and speaking up and a lot more proactive on this round than we were after the 1998 hearings.

We'll have additional material that we're going to have in our written comments that will be available to everybody here on your website.

Thank you very much.

(Applause)

MR. MUGDAN: Your question about resources is a fair one.

In our region, we've had some of the largest Superfund sites in the country. I only have about four sites that have more than one Remedial Project Manager. This site has three -- they're all here today -- in addition to technical staff that we bring to bear.

That's some evidence of the degree of priority we're giving it.

MR. HOMMER: Good evening. Mark Hommer, H-O-M-M-E-R.

MR. MUGDAN: Mr. Hommer, excuse me.

I said this earlier, I just want to say it again. We do have a number of slides on the flooding issue. My colleagues have asked me several times could we get to it because of all the questions.

I actually think it's more important to hear from you. We will figure out the best way that we can to provide some of that information back to folks, but I think because we have the limited time I'd rather hear from you.

So, that's why we're not going to those slides. And I apologize to my colleagues, because I know they're itching to try to get you some of this information.

Mr. Hommer, I apologize.

MR. HOMMER: That's all right.

The critical issue here is the

fact that this is a flood plain. It cannot be denied that this will continue to flood and probably in more frequency. The proposal that you have come up with does not deal with the fact that the entire site is in a flood plain.

I want to know why that was not considered as a primary factor in your decision in the particular plan.

MR. MUGDAN: If that's a direct question, I'll give you a direct answer.

MR. HOMMER: It's a direct question.

MR. MUGDAN: We expect that this site will be under water relatively frequently into the future. That's our expectation.

MR. SIVAK: When we use the terms flood plain soils and main plant soils, it's a delineation based on the berm and based on our way to manage those different types --

MR. HOMMER: Okay, but that's a

delineation based upon a manmade structure. I'm not talking about that. I'm talking about a delineation based upon the natural course of the river.

MR. MUGDAN: And our expectation is that the entire site will be under water on a regular basis. That's our expectation, as it was last year.

MR. HOMMER: Secondarily, I'd like to remind everyone in the room that what happens here is that corporations privatize the profits and socialize the costs every single time. We're all expected to pay for this.

(Applause)

MR. HOMMER: A direct question, sir.

The overall total environmental impact, including the environmental impact of all the proposed remediations, is that something that has been calculated out?

The trucks, the concrete, the production of the concrete, the total environmental impact of everything involved in your plans, how -- was that calculated out?

MR. MUGDAN: If I understand your question, I think the answer is probably fairly no, we have not quantified it.

MR. HOMMER: Why not?

MR. MUGDAN: That's a fair comment and we expect to --

MR. HOMMER: I'd also like to ask if the downriver impacts, the cumulative impacts of years of this impacting all of the ecosystems downriver as well as the human ecosystem, who's going to pay for that degradation of it?

MR. MUGDAN: Under the Superfund law -- another good question -- it's EPA's task to look prospectively and deal with the environmental problems moving forward, as there are separate authorities, or what are called Natural Resource Trustees, to seek damages for those -- the kind of damages that you just alluded to.

In this case, the Trustees at the federal level would be Fish & Wildlife and NOAA, National Oceanic & Atmospheric Administration. And at the state level, the State itself is the Trustee.

So, yes, there are opportunities for State -- for State and Federal Trustees to seek damages for both past and future natural resource damages.

MR. HOMMER: Just to reiterate, one more time, it's a flood plain, it's going to continue to flood, chances are with more frequency, and, once again, everyone here, they privatize the profits and socialize the costs.

(Applause)

MR. MUGDAN: Thank you.

Well, one thing that I'm getting loud and clear -- and Michael alluded to it -- is that our use of the phrase "flood plains" and "main plant area" has been a mistake in the sense that, first of all, it doesn't recognize that the entire area is a flood plain, which, of course, we do understand. In fact, we spent a great deal of time and effort with Pfizer dealing with the results of the hurricane last year.

So, that's a change. I'm going to see whether we can incorporate it. I mean, whether we change every single word in every document, that's another question.

I certainly understand the point, and we want to make it crystal clear that we understand that going forward this entire site, the whole hundreds of acres, is expected to be under water on a regular basis, and, therefore, anything we do has to take account of that.

We may have differences of opinion as to how to properly take account of it, and there'll be comments about that. And we'll be responding to those and we'll be re-evaluating the matter as we do that. But we understand that and it is directly an element of the work we've done.

Go ahead.

MR. SCHMITT: My name is John Schmitt. I'm a resident of Bridgewater for about twenty years now and a resident of Central New Jersey all my life. I don't think I've lived more than three miles from the Raritan River during that time. So I grew up on it and voted on it and I know it well, canoe on it.

I am a member of the Resident Steering Committee for the Cyanamid site, and I'm also Chairman of the Economic Development Advisory Committee for Bridgewater Township.

As a member of the Resident Steering Committee, I've had an opportunity over the past year to visit the site on several occasions and to gain a basic understanding of some of the key issues at stake. This is a large, very complex site that warrants the depth of analysis that's going into the development of the EPA proposal for a sitewide remedy.

As it stands now, the site has a health risk exposure for anyone on the property and the potential for a wider threat during flooding conditions.

The site is one of the largest properties in Bridgewater Township but currently has little value for residents or for anyone else.

The EPA proposal appears to me to offer a balanced approach for remediation. It uses proven conventional technologies, it can be implemented in a reasonable timeframe, it minimizes risks during construction, with limited surface disturbance and soil relocation. It permits future use for parts of the site, including ecological restoration for 370 acres, approximately 30 acres for potential commercial usage, and 36 acres for alternatives energy generation.

Some people, I know, would like to wait and do more study before taking action, and recognizing that we don't know everything, but I think that the evaluations that will be conducted during the engineering design phase will flesh out many of those details. And I expect that as that information is acquired, the EPA will make any modifications to the sitewide remedy that they feel are required to assure public safety and environmental protection.

The American Cyanamid site was placed on the National Protection List back in September of 1983. That's almost thirty years ago. Exhaustive study has been underway for many years and various options have been reviewed. The EPA has taken their alternatives all the way up to their National Remedy Review Board for consideration and recommendation. And it was after all of that that they have settled on Alternative 4A as their recommendation.

I think the time for action has arrived. I hope the EPA will move forward and implement Alternative 4A.

(Applause)

MR. MUGDAN: We're going to have time for a few more comments, but we are going to have to leave here in just a little while. So, I'm going to ask for a couple more people to still come on up.

MR. STANDER: Thank you. My name is Ross Stander. I'm Chairman of the Crisis committee that's been working on this for many, many years.

Just a quick note on Crisis. We have 54 members currently. We're a community group, very much a local group. Most of our members are from Bridgewater and Somerville and from a few surrounding towns. We've had the same Executive Director and Technical Advisor for eighteen years. You met them tonight. This gives us an awful lot of site knowledge and site history and continuity that we can continue to provide.

We have prided ourselves in providing very much independent analysis; technical analysis, primarily. And I have to admit that we have a certain bias, and that bias is towards the safety and health of the local residents.

We've made many recommendations over the years to the EPA and DEP and the owners of the site. Many of those have been adopted into plans. And I have to say that we have not been reluctant in the past to try to slow things down when we've disagreed with positions that have been taken.

What I'd like to do for a couple of minutes is give you my overall impression of where we are today. Even though the process has taken way too long, I think that it's true that some progress has been made.

You've actually heard before

that some of the impoundments have been remediated. Those have been the easier ones. An awful lot of integrated planning on the site has been done, and that's been absolutely required over the years, and that's taken time, and we recognize that. I think it's been very valuable.

But it's also very true what's been said tonight; we still have a very complex environmentally dangerous site to deal with. And unfortunately, in the FS that's been discussed tonight, the two worst impoundments, as you probably know, have not been included in that.

From Impoundments 1 and 2 near the river, we really have a terrible situation today. We have benzene and other VOCs that are leaking into the river. The river is damaged, as Walt said.

Pfizer is directing resources at an interim-approved program to gain control of the leaks. By the way --

(Pause in proceedings)

MR. STANDER: We can use kind of a different term, at least I do, when we talk about interim than the folks did tonight. We say the groundwater treatment, pretreatment, which Crisis has been calling for for many, many years, it is now being implemented by Pfizer as two stages. And the current one we're looking at is the interim, and the long-term plan is what we'll see come out of the focus feasibility study next year.

So, we hope that the so-called interim program to kind of gain control of benzene and other VOCs into the river is going to go far. They're monitoring that, and we think that -- we assume that the pretreatment plant at Pfizer at the interim level is going to come on site pretty soon.

Right?

And we call for everybody to supply more resources to get the permanent plan going. We know that they'll be looking at 2013 for the Focused Feasibility Study. And anything that EPA and Pfizer can do, and we'd certainly help, to speed that up, that would be great.

MR. MUGDAN: I'll ask you to try to wrap it up, please.

MR. STANDER: Okay.

We're in favor of implementing 4A. We're not reluctant to oppose the Alternative 3 a few years ago. We think that now you've got Pfizer and EPA and Crisis all kind of focussed on 4A, and we think that you should move forward as quickly as possible.

Just a couple more seconds.

It seems clear to me that process within EPA and within the whole program is the way that we may be able to make improvements and speed up the program over time. We think that will be very important to do, so we hope that EPA can look at the process.

We also -- I don't want to go

into details because you've heard a lot of --

MR. MUGDAN: We do need you to wrap up.

MR. STANDER: We also would like to ask the question: Why is it going to take ten years to implement that program?

Thank you.

(Applause)

MS. PATTERSON: Hi. My name is Dana Patterson. I'm the Toxics Coordinator for the Edison Wetlands Association. That's P-A-T-T-E-R-S-O-N.

First thing I wanted to submit into the record is a letter requesting a sixty-day extension on the comment period. And I understand tonight that EPA has granted that, so we would like to thank you for that. It was signed by six organizations.

MR. MUGDAN: Just so there's no ambiguity, it wasn't completely clear to me from when you wanted that sixty days.

What we said is May 15 will be the deadline. That's a total of ninety days for the whole time.

MS. PATTERSON: We agree with that. Thank you very much for extending the comment period.

The second thing I would like to submit into the record is we, Edison Wetlands Association, started two petitions on change.org.

The first one was back about six months ago when we found out that there was benzene leaking into the Raritan River, and it was urging EPA to take immediate action. And that has over two thousand signatures on that.

And the second one is specifically related to the proposed plan comment, and that has about fifteen hundred signatures, where people are opposed to 4A.

So, I just wanted to enter both of those into the record.

The third thing I would like to talk about is using Alternative 7, the low temperature thermal desorption unit, we're in support of using that for the areas of the site where the soil can be treated.

Specifically, I would like to mention that EPA used it extremely successfully at the Cornell-Dubilier Superfund site in South Plainfield where they treated soils on site. That site was about a 25-acre area, they treated PCB-contaminated soils, and it was run by the Army Corps of Engineers. And in about two years, they treated all the soils.

So, I just wanted to make sure that EPA is reflecting their Cornell-Dubilier site, looking at the numbers, and comparing them to what Pfizer has proposed in their Feasibility Study, and making sure that these cost estimates are not inflated because EPA knows how this works, has seen it operate, and has realtime costs for this low temperature thermal desorption unit. So, please take that into consideration.

The next thing I would like to just address is just doing a little simple math here, the public had two hours to comment. That's a hundred and twenty minutes. At three minutes, that's forty people commenting.

Clearly, when I walked into this room today, there was about a hundred and fifty people in here. So, the chance for every single person at three minutes is not really feasible.

So, I understand there's other ways to comment, but if people would like to publicly speak who have not prepared a statement, there should be either a second public meeting or some other forum where they're able to come with a stenographer and give public comment.

(Applause)

MS. PATTERSON: So, I just would like to make that very clear. So, if you can please take that into consideration.

We support Option 7 and Option 11, excavation, treatment of on-site soils with low temperature thermal desorption, bioremediation, any alternative that treats the soil and excavates the soil and not contain it on site.

A cap is not a cleanup and we will not accept that. This is a flood plain. You cannot cap toxic waste in a flood plain.

Thank you.

(Applause)

MR. MUGDAN: This will probably be our last comment.

As a practical matter, I've been giving five minutes, but I take your point.

And this has to be the last one.

MS. ZIPF: Hi. My name is Cindy Zipf, Z-I-P-F. I'm Executive Director of Clean Ocean Action, which is a coalition of groups throughout the New

York/New Jersey area that are concerned about the downstream effects to the marine environment from all the dilution by solution -- solution in dilution.

And the ocean issues that we're concerned about here are, of course, the leachate that's been coming from the plant. And we're here to listen to the local concerns that have been raised and to support our local environmental leaders that have been championing this issue for so many years.

I know it takes a long time to address Superfund sites. It is terribly -- every Superfund site has a horrible story of legacy and time. But it's very clear from what we've heard tonight from the sewerage treatment plant operator, from the thoughtful consultants that are representing Edison Wetlands, that a lot of major issues still need to be addressed. It's a major hallmark issue here.

The fact that there's a plant that is going to be built to address the water quality and discharge and that the standards are not necessarily sufficient raises serious concern for us because those discharges are going to go downstream and effect, ultimately, the marine environment.

There's also the question about those two major sites that are left closest to the waterway that you don't really have a plan for. You're going to figure it out as you go along. I mean, that --

MR. MUGDAN: Just a clarification.

Those are Nos. 1 and 2. They're under a separate study. We're not figuring it out as we go along. That's a separate study that will be done next year.

MS. ZIPF: Okay, so, separate study, but that's a major portion of what needs to be addressed here. And

I'm not sure whether sea level rise has really been thought about.

But I did want to come in and just say a couple of things about Pfizer.

First of all, true confessions and transparency, my grandfather worked at American Cyanamid, Frederick William Zipf, and was a very -- had a leadership role in American Cyanamid. He was also an avid fisherman and a boater. And I know he wants the best done at that plant for his legacy, that mistakes were made, and he would expect the best to be done.

And now that Pfizer owns the facility, we have hope because Pfizer is the world's largest research-based pharmaceutical company. If you go to their website and you look up their environmental standards, they're impressive. They say: We believe that collectively our individual experiences allow us to better meet the needs of our patients and further our work to make the world a healthier place.

They say on their website under commitment to the environment: Because of our unmatched resources -- because our unmatched resources allow us to do more good for more people, we will use our global presence and scale to make a difference in local communities and the world around us.

Clearly, Pfizer owns this land, the legacy, and the liability. They can do more and they must be expected to do more.

And 4A is not enough.

(Applause)

MR. MUGDAN: I have to call it a night now.

We'll take into consideration all the comments that have been made. We urge those that didn't have an opportunity to speak to use the electronic mechanisms, the written mechanisms. We will be continuing to communicate with the community.

We do have to ask you now to make your way out as quickly as possible.

MS. BINGHAM: Can I just put on record one thing real quick?

I just wanted to put on record that I echo Dana Patterson, what she said with the time restraints. I wanted to read something into the statement tonight, didn't have time. I know that other people wanted to read something.

So, I just wanted that to be put on record.

I'm Victoria Bingham.

MR. MUGDAN: Thank you all very much for your attention and for your patience. We appreciate it.

Drive safely.

(Time noted: 9:57 p.m.)

C E R T I F I C A T E

STATE OF NEW JERSEY)
) ss.
COUNTY OF HUDSON)

I, LINDA A. MARINO, RPR, CCR, a Registered Professional Reporter, Certified Court Reporter, and Notary Public of the State of New Jersey, do hereby certify that the foregoing transcription of the public meeting, taken at the time and place aforesaid, is a true and correct transcription of my shorthand notes.

I further certify that I am neither counsel for nor related to any party to said action, nor in any way interested in the result or outcome thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this 12th day of March, 2012.

Linda A. Marino

LINDA A. MARINO, RPR, CCR

ATTACHMENT D: PUBLIC COMMENTS

New Jersey Senate

Christopher "Kip" Bateman
Senator, 16th District
Somerset-Morris Counties
36 East Main Street
Somerville, NJ 08876
908 526-3600
Fax 908 707-4578
email: SenBateman@njleg.org

Committees
Judiciary
Environment
Law and Public Safety
Deputy Conference Leader

February 28, 2012

Mr. Joseph Battipaglia
U.S. EPA Records Center, Region 2
290 Broadway, 18th Floor
New York, New York 10007-1866

Dear Mr. Battipaglia:

This letter is to give conceptual support for the EPA proposal to remediate the 435-acre American Cyanamid superfund site in Bridgewater Township, New Jersey.

For 18 years, up to this January, I represented Bridgewater Township in the New Jersey Legislature - - first as an Assemblyman and for the past 6 years as State Senator. Because of recent legislative redistricting decisions, my Senate district no longer includes Bridgewater Township, but I continue to represent the neighboring communities of Manville and Somerville.

As a member of the Senate Environmental Committee, I have always been deeply concerned about the difficult but slow pace of cleaning up that significant Raritan River-bordering superfund site.

Your EPA proposal seems to me to properly address the most serious hazardous waste containment and flooding problems that plague the site.

As the planned improvements go forward and go into more detail, I reserve the right to comment on specific aspects of the project. It appears to me that present-owner Pfizer is completely cooperative and pro-active in making these improvements.

It is my hope that our New Jersey Department of Environmental Protection will cooperate with EPA in the final planning process.

Very truly yours,

Christopher "Kip" Bateman

CB/n
CC: Honorable Lisa P. Jackson
EPA Administrator

THE TOWNSHIP OF BRIDGEWATER
100 COMMONS WAY
BRIDGEWATER, NJ 08807-2447
908/725-6300 EXT 5001 / FAX 908/725-3192
email: mayor@bridgewaternj.gov

DAN HAYES
Mayor

May 11, 2012

Mr. Joseph Battipaglia
Remedial Project Manager
USEPA
290 Broadway, 19th Floor
New York, New York 10007-1866

RE: Public Comments
American Cyanamid Superfund Site Proposed Plan

Dear Mr. Battipaglia:

Thank you for the opportunity to provide written comments on the Proposed Remedial Plan for the American Cyanamid Superfund Site. The input provided in this correspondence serves to reinforce my commitment as a local official to advocate for an expeditious and environmentally sound clean-up of the former facility.

My foremost concern as the Mayor of Bridgewater is for the health and safety of the community. In this regard it is imperative that these aspects be paramount during any remedial actions as directed by the United States Environmental Protection Agency (USEPA) for the former American Cyanamid Superfund Site. It is further obligatory that Township residents and the surrounding community in close proximity to the former industrial site be recognized as the primary stakeholders in the remediation and viable restoration of the property. All remediation plans from a technical perspective should be designed and reviewed with full recognition and acknowledgement of the needs and protection of the immediate community. I trust that the USEPA will employ all of its technical experts in review of the submitted plan by Pfizer. The EPA experts will determine which is the most suitable remedial plan to restore the site and takes into account the safety, health and welfare of the surrounding community during the cleanup.

That being said I support the approval of Alternative 4A for the remediation of the former American Cyanamid Site. The proposed plan represents the best available alternative for site remediation at this time. It is noted that Pfizer Corporation has taken a site they inherited through acquisition and demonstrated a willingness to invest significant capital resources to initiate and expedite site clean-up. Their communication with Township government and my Administration is to be commended. Their remediation team has expressed a willingness and desire to educate the community about the process and the steps it will undertake to return the property as an asset to the community and surrounding region. Alternative 4A encompasses the public safety, timeliness and reuse goals the site commands and will serve to benefit Bridgewater and the surrounding community.

Sincerely,

Daniel J. Hayes, Jr.
Mayor

R2-0007558

Howard V. Norgalis
[redacted]
Bridgewater NJ 08807

Mar. 26, 2012

N.J. Department of Environmental Protection
401 East State Street
Trenton NJ 08625

U.S. Environmental Protection Agency
290 Broadway 18th Fl
New York NY 10007-1866

Re: American Cyanamid Superfund Site- Bridgewater NJ

Dear Folks,

While I am a Bridgewater Township Councilman I am writing to both of your organizations as a concerned resident. I have been following the cleanup process at the American Cyanamid Superfund Site in Bridgewater NJ for decades and am very pleased to see the cleanup process effort starting to accelerate.

I attended the Mar. 8, 2012 public meeting held at the Somerset County Vocational and Technical High School in Bridgewater and feel that I have a reasonable understanding of the "4A" recommendation. I was very pleased to see that the plan included the construction of treatment plant on site which will alleviate the 650,000 GPD load on the Somerset Raritan Valley Sewerage Authority. My main concern is the permissible level of discharge from the "new plant" to the Raritan River for several of the more toxic ground water chemicals such as benzene and arsenic. I have even gone so far as to read parts of the New Jersey Surface Quality Standards. It is my understanding that the NJ stream standard is 0.15 micrograms per liter for Benzene and 0.017 micrograms per liter for Arsenic. It is my considered opinion that those are the standards that should be set for the "new plant". Any levels above those standards are a disservice to those who rely on the Raritan River as a water supply or for recreation.

Please feel free to contact me by phone [redacted] or e-mail [redacted] should you have questions on this correspondence.

Sincerely,

Howard V Norgalis

Howard V. Norgalis

R2-0007559

NEW JERSEY GENERAL ASSEMBLY

ERIK PETERSON
ASSEMBLYMAN, DISTRICT 23
HUNTERDON, SOMERSET AND
WARREN COUNTIES

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CLINTON, NEW JERSEY 08809
TELEPHONE: (908) 238-0251
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ELECTRONIC MAIL: AsmPeterson@njleg.org

May 14, 2012

Mr. Joseph Battipaglia
US EPA Records Center, Region 2
290 Broadway, 18th Floor
New York, NY 10007-1866

Dear Mr. Battipaglia:

I understand that the US Environmental Protection Agency (EPA) has proposed a cleanup plan to remediate the Superfund site located at the 435-acre American Cyanamid property in Bridgewater Township, New Jersey. I am writing in support of the proposal.

It is my understanding that if the remediation proposal is approved, the current property owner, Pfizer, Inc., is committed to moving forward with the improvements. This proposal will help ensure the health of the people who live near the site and will improve the water quality in the Raritan River.

I appreciate your consideration of my letter. Best wishes.

Sincerely,

Erik Peterson

THE BOARD OF CHOSEN FREEHOLDERS
OF THE COUNTY OF SOMERSET
NEW JERSEY

COUNTY ADMINISTRATION BUILDING
20 GROVE STREET, P.O. BOX 3000, SOMERVILLE, NEW JERSEY 08876-1262
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PATRICK SCAGLIONE
Freeholder

MARK CALIGUIRE
Freeholder

MICHAEL J. AMOROSA
Administrator/Clerk
(908) 231-7040

KATHRYN QUICK
Deputy Clerk

March 22, 2012

Mr. Joseph Battipaglia
U.S. EPA
290 Broadway, 19th Floor
New York, NY 10007 1866

Re: Proposed Plan for the American Cyanamid Superfund Site, Township of Bridgewater, Somerset County, New Jersey

Dear Mr. Battipaglia:

Please accept this correspondence in reference to the clean-up effort concerning the American Cyanamid industrial site in Bridgewater, New Jersey. This correspondence represents the Somerset County Freeholder Board's official submission concerning the proposed cleanup plan.

The Somerset County Board of Chosen Freeholders is pleased that the remediation of the project is moving forward. This is an important project with significant implications for Somerset County and the surrounding communities, and the Board whole-heartedly supports the effort.

Somerset County reiterates its long standing interest in the remediation of the property in question and requests that Pfizer and the EPA give serious consideration to the following:

- The American Cyanamid site lies on a critical segment of flood plain and represents an important link along the Raritan River Greenway. It has been the stated policy of the Somerset County Board of Chosen Freeholders and the Somerset County Park Commission to create and maintain an accessible public greenway along the entire course of the Raritan River in our County, and the American Cyanamid site represents a property of interest as we pursue this goal. Understanding the Pfizer may not be able to transfer title to the lands along the Raritan River for the Greenway we are more than willing to accept an easement that allows future public access to the river frontage.

- Also, the County believes that the critical element of any remediation plan is the total remediation of the wetlands contained on the property, particularly those located along East Main Street in Bridgewater (Block 347, Lot 1.02). This particular parcel was part of the original American Cyanamid property and was transferred to Bridgewater Township and the Somerset County when

American Cyanamid disposed of the "Hill Property" for Public, Commercial, and Retail Development in the mid-1990s. These wetlands remain one of the critical environmental elements of the County-owned property, and their remediation by Pfizer would represent an essential milestone in the County's efforts to return this property to environmental acceptability and Public use.

The County remains an interested stakeholder in the future of the American Cyanamid property, provided that the remediation efforts throughout the property, but particularly with relation to the river frontage and above-referenced wetlands, are completed in a thorough and comprehensive fashion.

Very truly yours,

Patricia L. Walsh

Patricia L. Walsh
Freeholder Director

cc Board of Chosen Freeholders
M. Amorosa
W. Cooper
R. Brown
R. Downey

THE BOARD OF CHOSEN FREEHOLDERS
OF THE COUNTY OF SOMERSET
NEW JERSEY

COUNTY ADMINISTRATION BUILDING
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PATRICK SCAGLIONE
Freeholder

MARK CALIGUIRE
Freeholder

MICHAEL J. AMOROSA
Administrator/Clerk
(908) 231-7040

KATHRYN QUICK
Deputy Clerk

May 24, 2012

CLARIFICATION
(letter dated March 22, 2012)

Mr. Joseph Battipaglia
U.S. EPA
290 Broadway, 19th Floor
New York, NY 10007 1866

Re: Proposed Plan for the American Cyanamid Superfund Site, Township of Bridgewater, Somerset County, New Jersey

Dear Mr. Battipaglia:

Please accept this correspondence in reference to the clean-up effort concerning the American Cyanamid industrial site in Bridgewater, New Jersey. This correspondence represents the Somerset County Freeholder Board's official submission concerning the proposed cleanup plan.

The Somerset County Board of Chosen Freeholders is pleased that the remediation of the project is moving forward. This is an important project with significant implications for Somerset County and the surrounding communities, and the Board whole-heartedly supports the effort.

Somerset County reiterates its long standing interest in the remediation of the property in question and requests that Pfizer and the EPA give serious consideration to the following;

- The American Cyanamid site lies on a critical segment of flood plain and represents an important link along the Raritan River Greenway. It has been the stated policy of the Somerset County Board of Chosen Freeholders and the Somerset County Park Commission to create and maintain an accessible public greenway along the entire course of the Raritan River in our County, and the American Cyanamid site represents a property of interest as we pursue this goal. Understanding the Pfizer may not be able to transfer title to the lands along the Raritan River for the Greenway we are more than willing to accept an easement that allows future public access to the river frontage.

- Also, in the mid-1990's American Cyanamid transferred a property along East Main Street in Bridgewater (Block 347, Lot 1.02) to Bridgewater Township and Somerset County when it disposed the "Hill Property" for public, commercial, and retail development. This now County-owned property contains wetlands which remain a critical element in the planned future development of the tract. Assistance by Pfizer in mitigating the wetlands on Lot 1.02 during Pfizer's remediation effort south of the New Jersey Transit line would represent an essential milestone in the County's efforts to return this property to environmental acceptability and public use.

The County remains an interested stakeholder in the future of the American Cyanamid property, provided that the remediation efforts throughout the property, but particularly with relation to the river frontage and above-referenced wetlands, are completed in a thorough and comprehensive fashion.

Very truly yours,

Patricia L. Walsh

Patricia L. Walsh
Freeholder Director

cc M. Amorosa
R. Downey

Pfizer Inc.
100 Route 206 North, MS 610
Peapack, NJ 07977
Tel: 908-901-6079

VIA ELECTRONIC DELIVERY

May 15, 2012

Mr. Joseph Battipaglia
Remedial Project Manager
U.S. ENVIRONMENTAL PROTECTION AGENCY
290 Broadway, 19th Floor
New York, NY 10007-1866

RE: American Cyanamid Superfund Site
Wyeth Holdings Corporation
Bridgewater Township, New Jersey
Comments on Proposed Remedial Action Plan

Dear Mr. Battipaglia:

On behalf of Wyeth Holdings Corporation, Pfizer Inc is submitting the attached comments on the Proposed Remedial Action Plan for the American Cyanamid Superfund Site that was issued by the U.S. Environmental Protection Agency on February 16, 2012.

If you have any questions or require further information, please do not hesitate to contact me at 908.413.0811.

Very truly yours,

Russell Downey

Russell Downey
Director – Environmental Engineering, Remediation & Transactions
Pfizer Global Engineering
Pfizer Inc

cc:	USEPA Region II:	Mark Austin, Michael Sivak, Angela Carpenter
	NJDEP:	Haiyesh Shah, Allen Motter
	Pfizer Inc:	Steve Kemp, Ronald Schott
	Quantum Management:	Vince D'Aco
	O'Brien & Gere:	Steve Roland, Angelo Caracciolo
	Vita Nuova:	Mike Taylor, Elaine Richardson

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VIA ELECTRONIC DELIVERY

May 15, 2012

Mr. Joseph Battipaglia
Remedial Project Manager
U.S. ENVIRONMENTAL PROTECTION AGENCY
290 Broadway, 19th Floor
New York, NY 10007-1866

RE: American Cyanamid Superfund Site
Wyeth Holdings Corporation
Bridgewater Township, New Jersey
Comments on Proposed Remedial Action Plan

Dear Mr. Battipaglia:

On behalf of Wyeth Holdings Corporation, Pfizer Inc is submitting the attached comments on the Proposed Remedial Action Plan for the American Cyanamid Superfund Site that was issued by the U.S. Environmental Protection Agency on February 16, 2012.

If you have any questions or require further information, please do not hesitate to contact me at 908.413.0811.

Very truly yours,

Russell Downey

Russell Downey
Director – Environmental Engineering, Remediation & Transactions
Pfizer Global Engineering
Pfizer Inc

cc:	USEPA Region II:	Mark Austin, Michael Sivak, Angela Carpenter
	NJDEP:	Haiyesh Shah, Allen Motter
	Pfizer Inc:	Steve Kemp, Ronald Schott
	Quantum Management:	Vince D'Aco
	O'Brien & Gere:	Steve Roland, Angelo Caracciolo
	Vita Nuova:	Mike Taylor, Elaine Richardson

Comments to the Proposed Remedial Action Plan
American Cyanamid Superfund Site

Wyeth Holdings Corporation (WHC) appreciates the opportunity to provide these comments on the February 16, 2012 U.S. Environmental Protection Agency (EPA) proposed remedial action plan (PRAP) for addressing the site-wide soils, groundwater, and the impoundment contents that have not yet been remediated (with the exception of Impoundments 1 and 2) at the American Cyanamid Superfund Site in Bridgewater, NJ (Site). Based upon a review of EPA's proposed remedy, and public comments made at the Public Hearing held on March 8, 2012, WHC respectfully submits the following comments into the administrative record.

The PRAP is based upon a comprehensive Site-wide Feasibility Study Report (FSR), the work for which was initiated by WHC in 2004. The FSR underwent multiple revisions following reviews by the EPA, the New Jersey Department of Environmental Protection (NJDEP), Bridgewater Township, and CRISIS, as well as the EPA National Remedy Review Board. In general, WHC supports the PRAP as a balanced approach to addressing site-wide concerns. The following comments provide clarification of several key points in the PRAP.

The Proposed Remedial Action Plan is Comprehensive and Appropriate

The PRAP is comprehensive in nature and WHC generally agrees that, in combination with the provisions of the work being performed pursuant to the 2011 Administrative Settlement Agreement and Order on Consent for Removal Action (the 2011 Order), and the ongoing remediation of Impoundments 15 and 16 (iron oxide recycling), it will appropriately address all known contamination caused by activities at the Site, other than Impoundments 1 and 2, which are to be the subjects of a separate Focused Feasibility Study.

Including:

1. All remaining impoundments requiring remediation (other than Impoundments 1 and 2) will be addressed by the proposed remedy (OU-3).
2. The soils portion of the proposed remedy will address all known Site soil issues (OU-4).
3. The groundwater portion of the proposed remedy, in combination with the removal action for known seeps currently being implemented pursuant to the 2011 Order, will comprehensively address Site-related groundwater issues (OU-5). Once the groundwater removal action in the Impoundments 1 and 2 area is completed for the overburden groundwater along the 2400 linear feet of collection trench and subsurface cutoff barrier, all other overburden and bedrock groundwater remedial design and construction will be performed pursuant to the Site-wide remedy.
4. Based on the results of Site remedial investigations, including the ecological and human health risk assessments, no additional actions are required for wetlands (OU-7) and the surface water and sediment of Cuckhold's (a.k.a. Cuckels) Brook and the Raritan River (although further surface water and sediment monitoring is planned during implementation of the groundwater remedy).

R2-0007567

Containment Is an Appropriate Component of the Remedial Action for this Site

Capping of portions of the Site is a component common to most of the alternatives evaluated in the Site-wide FSR, including Alternatives 3, 4, 4A, 5, 7 and 11. Caps, consisting of soils and geosynthetic materials, are proposed to provide a containment remedy for onsite materials and eliminate potential exposure pathways between Site materials and human and ecological receptors.

Caps designed, constructed, and maintained in accordance with current good engineering practices and regulatory guidance have functioned as required over time, in a manner that eliminates a potential exposure pathway to site materials, and pose no unacceptable risk to human health and the environment.

Protective caps are frequently chosen by EPA as an integral component of remedies at Superfund sites and other types of cleanup sites across the country. Protective caps have been in service on similar sites for many decades, and when subjected to periodic performance reviews and when adequately maintained, have maintained their protective function. The design and construction of each cap system must be tailored to each site's unique circumstances, and with selection of proven construction materials, both natural (e.g., soils and rock) and synthetic (e.g., geomembranes), along with rigorous construction quality control, a cap system as proposed in the PRAP can be expected to perform over time, when subject to routine post-construction inspection and maintenance. As required by the proposed remedy, regular inspections and maintenance consistent with best practices will be conducted to ensure that the caps perform as intended.

EPA's Technical Guidance document on "RCRA/CERCLA Final Covers" notes that the Design Life goal of cap systems can extend well beyond the typical "minimum" post closure care period of 30 years established in RCRA regulations. The Design Life is defined by (1) the service life of the cap system construction materials and (2) the design itself. The service life of natural materials, i.e. soil and rock, can be considered to be "infinitely long". Research performed by the Geosynthetic Institute[1] indicates that geomembranes can be expected to last for many centuries or more, if adequately maintained.

The design of the caps for the Site will incorporate all Site specific aspects that pose a long term threat, for example drainage, slope stability, erosion resistance (water/wind), freeze thaw, potential for flooding, and establishment of surface vegetation. These design concepts have well established engineering solutions and will be designed in the context of a 500-year flood event[2], which would be a more significant flooding event than observed during Hurricanes Doria (1971), Floyd (1999) and Irene (2011).

Caps Can be Designed and Maintained to Withstand Frequent Flooding

Engineered caps are commonly used at sites along floodplains, and can be successfully engineered to be protective in flood plain and flood prone areas, specifically with respect to preventing surface erosion and

1 Geosynthetic Institute (GSI) in Folsom, PA is a consortium of organizations interested in, and involved with, geosynthetics. The organizations include federal and state governmental agencies, facility owners, designers, consultants, QC and QA organizations, testing laboratories, resin and additive suppliers, manufacturers, manufacturer's representatives and installation contractors. GSI currently consists of 71 member organizations of which about 45% are international. Information on GSI can be found on the web at www.geosynnthetic-institute.org

2 Based upon Flood Insurance Rate Map and Flood Insurance Study for Somerset County, New Jersey (All Jurisdictions), Panels 162E and 166E, September 28, 2007

scouring. Site drainage design will further protect the capping systems. At a minimum caps will incorporate two feet of cover soil and appropriate erosion protection will be installed and maintained over these areas. In areas of shallow slope, vegetation will be adequate for preventing erosion. In steeper areas, especially along swales or other water courses that will be designed as part of the final development of the Site, the caps will be protected with armoring or other appropriate erosion control.

Because the portions of the Site requiring remediation are in the flood fringe area and not the floodway (the main flowing part of the river during a flood), the cap systems will not be subjected to extensive erosive forces. The design of the cap systems will account for flooding up to a 500-year design flood, which is higher than any flood that the site has experienced since it was developed in the early 1900s.

Geomembranes are often used for bottom liner systems for containment of waste and liquids and are very effective at preventing infiltration and release of contaminants into the environment. In the case of the Movement Control and Vapor Control caps, which will incorporate a geomembrane, the geomembrane will contain the waste materials and separate them from the floodwaters to prevent the release of any contaminants to the environment. As long as these geomembranes are adequately maintained and protected with cover soil and erosion control measures as described above, they will continue to function as designed for centuries as has been documented by research.

There are many examples of cover and cap systems being installed within a flood plain. A very relevant example is the Sharkey Landfill Superfund Site in Parsippany, New Jersey, which included a landfill in the middle of the Rockaway River. This landfill was successfully capped and the portion within the river and in the flood zone above the river's base flow was protected by armoring and has successfully withstood major flood events, including Hurricane Irene and Tropical Storm Lee in 2011, with no damage or release of contaminants to the environment.

<u>The Site Can Be Capped Without Any Significant Loss in Flood Storage Capacity</u>

For convenience, the Site has historically been divided into the following areas: Main Plant (area within the flood berm), Impound 8 Facility (area north and west of Polhemus Lane), and Floodplain (all other areas). However, it has always been understood that both the Main Plan and the Floodplain are located within the Flood Hazard Area.[3] The Impound 8 Facility is located outside the Flood Hazard Area.

In recognition of this, a major goal of the detailed design will be to minimize the loss of flood storage as a result of the remediation of the Site. Although it is acknowledged that capping alone would remove some flood storage capacity, other aspects of the remedy will create flood storage capacity. For example, once remediation is complete, a new natural stormwater management system, including freshwater wetland areas, will be present on the Site. Stormwater will be managed through this natural system which will allow for the return of an estimated 40 to 70 million gallons of flood storage capacity that is currently taken up by the storage of stormwater in Lagoons 6 and 7. As a result of this modification and other measures,

[3] NJDEP defines the Flood Hazard Area as the land and space above land which lies below the flood hazard area design flood elevation, which is the peak water surface elevation that will occur during the design flood (i.e., 100-year flood event) plus an additional amount as shown on NJDEP delineation figures. The flood hazard area is divided into the floodway and flood fringe. The floodway is the channel and area around the channel that has faster and deeper flows during the design flood; while the flood fringe is the area outside the floodway. The regulatory requirements for activities in the floodway tend to be more stringent than those in the flood fringe.

such as potential removal of all or portions of the dike around the Main Plant area,[4] the remedy will result in little to no net loss of flood storage.

While the Site is located within the Flood Hazard Area of the Raritan River, the portions of the Site requiring remediation are not located in the floodway itself where the major flow of the river is concentrated. Rather these areas are located in the flood fringe area. The significance of this is that any modifications to the Site grading will not change or obstruct flow in the main channel of the river (i.e., the floodway) but the Site will provide temporary storage of flood waters flowing from upstream, which will help attenuate flood impacts to downstream areas.

Minor changes to the current storage volume on the Site will have little to no impact to downstream flood elevations. To put this in perspective, it is estimated that the current storage capacity of the Site for a 500-year flood (a flood about a half foot higher than Hurricanes Floyd in 1999 and Irene in 2011) is approximately 1.5 billion gallons. The intent of the detailed design will be to balance any losses from regrading and capping by increasing storage elsewhere to result in as close to zero net loss as possible. However, if this is not possible, the net loss would likely be on the order of 100,000 cubic yards as a result of Site regrading and capping. This volume would represent only about 40 million gallons (a 1.4 percent decrease), and is equivalent to a loss in storage of less than two inches of water over the Site.

Moreover, flood storage capacity on Site will actually <u>increase</u> for the more common flood events, provided that the existing flood control berm surrounding the Main Plant area is totally or partially removed following Site-wide remedy construction. As an example, for a flood stage of 36.7 feet (approximately a 20-year flood), which is higher than all but four of the flood events in the last 40 years, it is estimated that removing the flood control berm would increase flood storage capacity by over 200 million gallons as compared to current conditions, which is almost a 50 percent increase. This will help lower velocities in the Raritan River, provide better control of flood conditions, and help establish viable floodplain habitat on the Site.

The design will follow current New Jersey Flood Hazard Control Act Rules (N.J.A.C. 7:13) regarding filling in a flood hazard area. WHC will work closely with the reviewing regulatory agencies (namely the EPA and NJDEP) to produce a design that is consistent with these regulations and that fulfills the objectives of the remedy.

<u>EPA Correctly Rejected Low Temperature Thermal Desorption (LTTD) as an Inappropriate Technology for the Materials in Impoundments 3, 4 and 5</u>

The use of LTTD as a component of the remedy has been considered and appropriately rejected for several reasons.

First, the FSR concluded that although the use of LTTD would reduce the toxicity of contaminants through treatment, there would still be a reliance on long-term protective engineered covers and groundwater treatment for many years. The containment technologies identified in the PRAP are equally as effective as LTTD in meeting the remediation objectives for the Site.

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[4] The extent to which the flood control berm may be removed will be determined during final design. Portions of the existing berm or a new berm may be incorporated into the remedy for flood protection in selected areas, e.g. the future groundwater treatment system, northeast area that will be developed commercially, etc.

Second, the extensive material handling would significantly increase worker and community exposure and safety hazards compared to in-situ containment alternatives. In fact, data generated during field studies showed that air emissions from excavation, pre-conditioning, and treatment would be difficult to contain and treat to achieve air permit requirements or permit equivalency requirements. Furthermore, LTTD was tested at the Site, on Impoundment 3, and was found to be inappropriate due to high levels of air emissions, even with extensive controls.

Third, LTTD has not been proven to be effective for the waste materials of these impoundments, which contain high concentrations of tars and other organics, elevated sulfur levels, and large quantities of debris. These materials are difficult to manage and will limit the effectiveness of LTTD. Although LTTD has been used at other sites for treating certain types of contaminated soils and sludge, this technology has not been used on a large scale to treat materials similar to those at this Site. Indeed previous experience with similar Site materials has shown that scale-up from bench studies to full-scale will be problematic. The chemical heterogeneity limits continuous processing and generally requires extensive pre-conditioning before any material handling or treatment activities.

Fourth, design, regulatory review, and treatability testing could extend the program 3 to 5 years before construction could begin. Implementation timeframes would also be increased due to increased pretreatment requirements, additional volume to be treated caused by pretreatment amendment addition, and operating restrictions imposed to meet air emission control requirements. Ultimately, LTTD could require up to 20 years longer to complete than Alternative 4A, posing greater vulnerability to flooding and other atmospheric conditions during construction.

Fifth, with respect to costs, EPA guidance for Feasibility Studies recognizes that the designs of the alternatives are still conceptual, not detailed, and as such the cost estimate is considered to be in the accuracy range of -30 to +50%. The unit costs utilized within the FSR were within the range of costs for direct-fired LTTD systems based on a review of published literature. The costs for indirect-fired systems, which may be required based on the high organic content of the material, are generally reported to be higher than direct-fired. For this reason, it is believed that the costs provided within the FSR are sufficiently accurate for completing the detailed analysis as presented, and may, in fact, be underestimated for actual implementation due to the inherent material complexities.

Finally, from a Green Remediation perspective, the proposed remedy will have a smaller carbon footprint as compared with LTTD, which would result in high carbon emissions from fuel combustion without providing additional benefit in terms of protecting human health and the environment. Thus the proposed alternative supports EPA Region 2's Clean and Green Policy (March 20, 2012) by achieving remedial action goals with reduced greenhouse gas production as compared with LTTD.

The Remedy Chosen in the PRAP Will Minimize Impacts from Air Emissions and Waste Transportation

The PRAP provides for the effective onsite treatment of principal threat waste through in-situ stabilization and solidification. This approach ensures that these materials are appropriately remediated while protecting workers and the community from the potential impacts of air emissions and excessive truck traffic associated with Alternatives 7 and 11 as described below.

First, with respect to Alternative 7, which would have the principal threat waste excavated, treated onsite with LTTD, stabilized and solidified, and, ultimately, disposed of in Impound 8, there are several reasons why LTTD is not appropriate, as explained above. Chief among these concerns are the potential excessive air emissions, the exposure of the community and workers to these air emissions, and the longer time that would be required to complete the remedy. Because Alternative 4A avoids these issues raised by LTTD, it is superior to Alternative 7.

Likewise, under Alternative 11 the principal threat waste would be excavated and transported offsite for incineration or recycling, while other materials would be treated using LTTD. This approach also creates disadvantages compared to Alternative 4A. Excavation of contaminated materials, as required by Alternative 11, would introduce significant additional risks to workers and the community from potential air emissions and dust generation. LTTD components of Alternative 11 would have similar disadvantages as LTTD required by Alternative 7, including potential air emissions, community and work exposures, and longer time to complete the remedy. Alternative 11 would also require the transportation of highly contaminated materials through the community creating greater risk of accident or spills. Approximately 24,000 truckloads of contaminated material would be transported through the community under this alternative, as compared with few or no truckloads of contaminated material under the proposed remedy.

Beneficial Reuse as a Component of Green Remediation

WHC recommends that the EPA encourage the beneficial reuse of soil from other development projects in the area as a goal during the design and implementation of the proposed remedy. Such materials may include dredge material which has been commonly used at many remediation sites in New Jersey and its use for this application is fully supported by the NJDEP. Other excess soils from residential, commercial or transportation projects may be utilized. All imported soils will be subject to appropriate environmental standards based on their placement within the cap systems at the Site (i.e., whether the material is placed below a geomembrane in the Movement Control and Vapor Control caps or as a cover soil above the geomembrane or in the Direct Contact soil cover areas). Beneficial reuse of these materials will provide needed soil fill for the remedy while removing the need to place or stockpile excess soils elsewhere in the community, and reducing the need to disturb previously undeveloped properties for soil mining. In addition, beneficial reuse of soil that would otherwise need to be transported elsewhere can potentially result in a net reduction of transportation miles between the two projects. Thus, the beneficial reuse of soil would be consistent with EPA's program initiative to reduce the use of natural resources and energy during remedial actions (Superfund Green Remediation Strategy, September 2010).

The PRAP Remedy Will Minimize Disruption to Existing Site Wetlands

Under EPA's proposed plan, the targeted remedy for Impoundments 13, 17 and 24 located within the flood fringe and outside the Main Plant area will be based upon the results of an ecological risk assessment to determine the need to relocate the impoundment contents to the Main Plant area. Focused excavation of more significantly impacted impoundment materials and subsequent relocation under an engineered protective cover in the Main Plant area is a balanced approach to addressing these materials. This approach ensures that existing wetlands and habitat are not impacted unnecessarily, while similarly ensuring that materials which pose an unacceptable risk are adequately addressed.

The remedy outlined for Impoundments 13, 17 and 24 in the PRAP is appropriate. The remedies for these Impoundments outlined in Alternatives 7 and 11 were not preferred for the following reasons:

Under Alternative 7, Impoundments 13, 17 and 24 will be excavated and relocated to the Main Plant area under an engineered protective cover, without conducting an ecological risk assessment.

- This approach potentially disturbs existing wetlands and habitats unnecessarily.
- Excavation of all the materials in these three impoundments will take a considerable amount of time, up to 2-3 years, increasing vulnerability to flooding and other atmospheric conditions during remedy construction.

Under Alternative 11, Impoundments 13, 17 and 24 will be excavated and relocated to the Main Plant area for onsite treatment with LTTD and stabilization/solidification.

- This approach potentially disturbs existing wetlands and habitat unnecessarily.
- LTTD would require a much longer time to complete, up to 25 years, increasing vulnerability to flooding and other atmospheric conditions during remedy construction.

Transportation Alternatives

The use of both freight trains and trucks will be evaluated for the transportation of materials during the design phase. Potential impacts to the community will be considered in the evaluation process. Rail transportation has been successfully used for some of the past remediation activities at the Site. For example, approximately 94,000 tons of iron oxide material has been transported off-site by rail for recycling.

Treatment of Extracted Groundwater

The PRAP calls for groundwater to be appropriately treated or pre-treated, as necessary, for subsequent discharge in accordance with appropriate requirements. As stated in the FSR, there is a preference for on-site treatment followed by direct discharge to either surface water or groundwater. During the design phase, all options for treatment will be evaluated. This evaluation will ensure that future groundwater inputs are fully treated prior to discharge to surface water, or possibly re-injected into the onsite aquifer for groundwater hydraulic control, pursuant to applicable discharge limitations required by EPA and NJDEP.

Bedrock Groundwater in the Impoundment 1 and 2 Area

The groundwater component of the proposed remedy includes groundwater collection and treatment. As stated in the PRAP, *"Conceptual improvements to the bedrock collection system include placing of the primary extraction well(s) in a more central location of the impacted bedrock and placing targeted bedrock extraction wells to address localized impacts such as in the vicinity of Lagoons 6 and 7/Impoundment 24."* WHC recommends that the PRAP be revised to clarify that the proposed remedy should address the bedrock groundwater from the Impoundments 1 and 2 area, other groundwater impacts located in the eastern part of the Site, as well as any other groundwater impacts that would be identified during the pre-design investigation preceding the remedial design. This approach is consistent with the installation of "*targeted bedrock extraction wells to address localized impacts.*" As for the entire groundwater control system *"additional details of these improvements would be developed during remedial design."*

Options for Discharge of Treated Groundwater

Regarding options for the discharge of treated groundwater, the PRAP states *". . . it is anticipated that discharge would be either to SRVSA, directly or following pre-treatment, or directly to surface water following on-site complete treatment."* WHC recommends that "recharge to groundwater following on-site complete treatment" should also be added as a potential discharge option to be evaluated during remedial design. This option presents the advantage of reducing the impact on groundwater storage on the State of New Jersey aquifers through onsite replenishment (i.e. recycling groundwater after treatment). Furthermore, groundwater reinjection can create hydraulic control boundaries at appropriate locations that will slow groundwater movement, and subsequent contaminant transport, across the Site. The groundwater re-injection option was received favorably by the NJDEP as illustrated by their comments to the Site-Wide FSR – Hydrogeological Comments on amended Appendix H, dated August 2011.[5]

Methods for Identifying Areas Requiring Vapor Controls

Pages 13 and 14 of the PRAP present the rationale for and a description of the areas of the Site requiring Vapor Control. This culminates in a reference to Figure 8 within the FSR which highlights those areas. However, as noted within Table 2 of the PRAP, "these values are preliminary and a more refined assessment method will be developed and implemented during the Remedial Design phase to appropriately delineate areas requiring vapor control." As described in the FSR, risk-based soil criteria were developed at which the potential for exceeding a 10^{-6} vapor inhalation risk in the breathing zone existed. These criteria were then compared to the existing Site soil data to provide a preliminary determination of those areas that may require Vapor Control. Further, as highlighted within FSR Section 3.2.1 Identification of Areas or Volumes of Media, an evaluation will be conducted during the Remedial Design to identify the definitive extent of areas which have a 10^{-6} vapor inhalation risk in the breathing zone that are not adequately addressed through institutional controls. It is our understanding that once these areas are defined, they will then be addressed with Vapor Controls which can consist of engineering controls, such as active or passive vapor mitigation systems, institutional controls, or a combination, as appropriate. Therefore, WHC recommends that the remedy description include a clarifying statement that the final definition of the limits of areas requiring Vapor Control will be determined through a more refined assessment implemented during the Remedial Design.

Controls Required for Soils in the Flood Plain Outside the Main Flood Control Berm

The description of Flood Plain Soils and Drying Bed Area under Alternative 4A in the PRAP (page 16), states, "These areas identified in the FSR requiring direct contact, movement, and vapor control would be excavated and consolidated at the Main Plant in areas where the same types of controls are warranted." WHC recommends that this sentence be revised to: "These areas identified in the FSR requiring direct contact, movement, and vapor control (i.e., the area south of Impoundment 13 and the former Drying Bed

5 NJDEP Comment 26 Appendix H, Section H4.0 – *"Optimization of the recovery system is suggested by relocating PW2 & 3 to the southwest (centered on transmissive zone), pumping at lower rates from multiple locations and re-injecting treated groundwater. An additional pumping well is proposed at LA07MP1 and possibly south of CCCC. While detailed proposals for implementation are required, these suggestions are acknowledged and conceptually acceptable."*

Area depicted on Figure 4) would be excavated and consolidated at the Main Plant in areas where the same types of controls are warranted."

Controls Required for Impoundments 13, 17 and 24

The description of remedial action required for Impoundments 13, 17 and 24 under Alternative 4A in the PRAP (page 16), states "an ecological risk assessment would be conducted during the remedial design phase to identify if any material requires relocation and consolidation in the Main Plant in areas requiring direct contact control." For clarification, the PRAP should reflect that the materials in these three impoundments are the only materials at the Site requiring additional ecological risk assessment.

Under the same section describing Impoundments 13, 17 and 24 (page 16), it appears that the second paragraph, located in the second column, (beginning with "An evaluation would be...") is misplaced. This paragraph is clearly in reference to determining what materials meet the definition of principal threat wastes and, as such, should follow the second paragraph under Main Plant Soils, Impoundments 3, 4, and 5 in column 1, which describes the proposed actions for those wastes.

Specific Comments

The following specific comments are presented in the interests of clarifying the PRAP and correcting some minor errors.

1. On page 4 of 21 under heading "Corrective Action on Groundwater Discharges". The statement that "after sampling was performed and laboratory analysis was completed in December 2010" is incorrect. In fact, the sampling was performed in December 2010, but the laboratory data was not available to WHC until January 6, 2011, the same day that the data was reported to EPA and NJDEP. WHC recommends that this statement be revised to read: "after sampling was performed and preliminary laboratory analytical results were reported on January 6, 2011".

2. On page 5 of 21 under the heading "Previously Remediated Impoundments", there is a reference to 50,000 cubic yards of highly mobile material from Impoundments 1, 2, 4 and 5 being treated onsite through recycling as a fuel source. All of this light oil material was treated offsite for energy recovery, not onsite.

3. On page 7 of 21 under the heading "Investigation Summary," the first sentence of the first paragraph indicates that all remedial activities were suspended in 2004, however this is not completely accurate. We suggest that this sentence be modified to read: "Remedial activities were suspended in 2004 pending the completion of a site-wide feasibility study, with the exception of other ongoing investigation and remediation activities associated with Impoundments 14, 15, 16 and 20 and continued bedrock groundwater extraction and treatment."

4. On page 9 of 21 under the heading "Scope and Role of Action", the fourth bullet should delete reference to Impoundments 1 and 2 since the eighth bullet calls out a new operable unit (i.e. OU8) which is only Impoundments 1 and 2. Also the fourth paragraph of this section also indicates that all ongoing remedial activities were suspended when, in fact, remediation of Impoundments 14, 15, 16 and 20 and groundwater extraction/treatment continued.

5. On page 16 of 21, we recommend that the first sentence be revised as follows: "This alternative would provide a combination of caps over impacted areas in the Main Plant to control the potential for direct contact with impacted soils/impoundment contents, which is one of the primary RAOs for the Site, with the addition of excavation and consolidation in the Main Plant for areas in Impoundments 13, 17 and 24 as determined by an ecological risk assessment."

6. On page 20 of 21 under heading "Implementability", 2nd paragraph: It states that ". . . however, Alternative 4A provides more protection through relocation of the Impoundment material in the floodplain to the Main Plant." WHC recommends that this statement be revised to read: ". . . however, Alternative 4A provides more protection through relocation of the Impoundment material in the floodplain to the Main Plant if required by results of an ecological risk assessment."

Robert E. Albano
[redacted]

May 12, 2012

Joseph Battipaglia
Remedial Project Manager
USEPA
290 Broadway, 19th Floor
New York, NY 10007-1866

Mr. Joseph Battipaglia
Re: written response on EPA Public Comment on American Cyanamid Superfund Feasibility Study

On behalf of the Bridgewater Cyanamid Oversight Committee, I wish to thank you for efforts you and your associates are making to remediate the site. Thanks for the presentation you gave the Committee in Dec 2011 and for the information you provided at the March public hearing.
This letter is the position and recommendation of the Bridgewater Cyanamid Oversight Committee.
Very Truly Yours,

Robert Albano
Chair- Bridgewater Cyanamid Oversight Committee

Att: 1

CC: Bridgewater Mayor and Township Council
Russell Downey – Pfizer Project Manager
Walt Sodie – CRISIS
BCOC members

To: Mr. Joseph Battipaglia
Subject: written response on EPA Public Comment on American Cyanamid Superfund Feasibility Study
From: Robert Albano, Chairman – The Bridgewater Cyanamid Oversight Committee
Date: May 12, 2012

The Bridgewater Cyanamid Oversight Committee, BCOC, was formed with assistance of the Mayor and Township Council of Bridgewater in May 2011. The BCOC consists (1) of local residents of diverse backgrounds and interests. Many members are long time residents and community leaders, some of whom were already familiar with the American Cyanamid site and situation. The Committee was assembled to study the proposed alternatives and to evaluate the benefits and liabilities of each. Its responsibility is to provide input to the EPA, DEP, Pfizer and the community on cleanup and future use of the property.

The Committee has met numerous times during the past year and has met with many people including EPA officials, Pfizer personnel and consultants, CRISIS members, Bridgewater Township officials and local interested parties. The Committee has studied background information, the alternative proposals for cleanup and visited the site on several occasions. This letter expresses recommendation of the Bridgewater Cyanamid Oversight Steering Committee as a whole and not of any one member. This letter expressly indicates the Committee's support for the proposed remedy with the additional conditions stated below.

The American Cyanamid Superfund site has been under review for almost 30 years. Exhaustive study has been conducted during that time leading to the present EPA identification of the preferred alternative. Pfizer, the current site owner, acquired the property in a corporate acquisition, never operated this site nor contributed to the existing conditions. In all our contacts with Pfizer to date, they have accepted responsibility for implementing an effective remediation plan and returning the site to a safe and useful property.

The Bridgewater Cyanamid Oversight Committee strongly supports the implementation of Alternative 4A. This alternative provides a balanced approach offering several benefits. It should make this site safe for residents of the surrounding area as well as for those living downstream from the site. Alternative 4A uses proven conventional technologies that can be implemented in a reasonable period of time. Since this alternative requires limited surface disturbance and soil relocation, it should minimize risks for residents during construction. The proposed 4A plan is consistent with EPA's RTU Initiative per the EPA Web site which encourages reuse of the property with a limited section having potential for commercial development and other areas available for active and passive recreation. Alternative 4A may also reduce the impact of future floods. Plan 4A has the additional advantage of being a living document that will accommodate use of new technologies and approaches as these are discovered. The Plan also will begin the clean up in a more timely and effective manner than other Plans under discussion,

The BCOC is working closely with and fully supports the effort of CRISIS, a local citizens group, which has monitored the cleanup for nearly 18 years, to continue its work under and extension of its TAG grant. CRISIS has and does serve as an information source and provides technical expertise on the site cleanup for the entire community and region. CRISIS has reviewed Proposal 4A. BCOC is primarily concerned with the future use consistent with safety of the community and surrounding areas. BCOC relies on CRISIS as a technical resource and BCOC supports the recommendations that CRISIS has put forward to improve Plan 4A.

The BCOC suggests the following be added to Plan 4A

1. Remove all PWT from the river banks to impounds behind the existing berm regardless of the risk assessments
2. Maintenance of the existing berm to
    a. control >100 yr storms by retaining excess flood waters
    b. provide an added level of safety against accidental leakage or seep from the impounds
3. Provide for stabilization of VOC/SVOC with evidence of effectiveness through Simulation, Bench and Field testing prior to implementations
4. Full treatment of ground and surface water on site with a specifically designed facility and not use SRVSA for water treatment
5. Ensure that all impounds and impacted areas are stable in the 500 yr storm for leaching, scouring, erosion or uplifting.
6. Protection of SRVSA and American Water from contamination from the site
7. Redundant capability to ensure that power to operations is not compromised by adverse weather, flood, or power interruption, such as 2011 Storm Irene.
8. Financial bonds for continuous operation, monitoring and maintenance of the site
9. Separation of impounds 1 and 2 from FS4A for a separated feasibility study
10. Implement Plan 4A consistent with "Return to Use" principles that support the economic value of the site as commercial ratable status. The Committee recognizes that much of the site cannot be returned to commercial use but support identification of areas in the Northern end of the property for commercial development and the central portion of the property for recreation uses.

The BCOC believes that moving forward with Plan 4A represents the best approach to cleanup of the site that has been on hold for 10 years. We disagree with those who suggest that the plan be scrapped for more study. We agree with CRISIS, Bridgewater Township, Somerset County, Pfizer and EPA assessments that Alternative 4A offers the best level of safety and timeliness.

Questions or comments may be addressed to:

Robert Albano
1149 Papen Rd
Bridgewater NJ 08807
bobalbano@yahoo.com

Footnotes:
1 Bridgewater Cyanamid Oversight Committee members

Member	Community
Alan Kurydla	Bridgewater Township Council President
Chris Poulsen	Bridgewater Health Director and Liaison to Bridgewater Township
Gene Yuliano	MD and Member Bridgewater Health Bd
George Schofield	Business owner- across from site, Rescue Squad member, Long time resident
Jim Anderson	Bridgewater resident
Jim Rokosny	Chairman Bridgewater Environmental Commission
John Schmitt	Chairman Bridgewater Economic Development Committee
Joseph Lefreiri	Commissioner, SRVSA
Michelle Lawrence	Member Bridgewater Recreation Board
Nitin Apte	Environmental Consultant and resident
Robert Albano	Chairman and former Bridgewater Township Council member, current Planning Bd member
Ross Stander	Chairman - CRISIS
Susan Dorward	Bridgewater Sustainability Task Force

Somerset County
Park Commission

Post Office Box 5327
North Branch, NJ 08876

April 19, 2012

Mr. Russ Downey
Director – Environmental Engineering, Remediation & Transactions
Pfizer Global Engineering
Pfizer, Inc.
100 Route 206, North, MS 610
Peapack, NJ 07977

Dear Russ:

The Somerset County Park Commission applauds the efforts of Pfizer, Inc. to address the long standing issues related to the clean up of the former Calco industrial site in Bridgewater Township, NJ.

Pfizer's pursuit of a solution to the numerous environmental issues at the former Calco facility is a positive step that we hope leads to this important regional resource to become the asset it once was.

Somerset County Park Commission's long standing interest in creating an accessible public greenway along the entire course of the Raritan River will ultimately depend upon a clean up of the Calco property. Accordingly Pfizer's efforts to find a solution to the environmental problems on the property are a predicate to achieving this important regional goal.

The Commission is encouraged that clean up options are now finally being considered and we thank Pfizer, Inc for being a pro-active property owner.

Sincerely,

Raymond A. Brown
Secretary-Director

HEADQUARTERS

355 MILLTOWN ROAD
BRIDGEWATER, NJ 08807

TEL: 908.722.1200
FAX: 908.722.6592
www.somersetcountyparks.org

Fw: Extension request
Cecilia Echols to: Joseph Battipaglia 03/06/2012 09:26 AM

----- Forwarded by Cecilia Echols/R2/USEPA/US on 03/06/2012 09:26 AM -----

From: Cecilia Echols/R2/USEPA/US
To: Wsodie@aol.com
Cc: [redacted]
Date: 03/05/2012 03:51 PM
Subject: Re: Extension request

Hi Mr. Sodie,

Your request has been forwarded to Joseph Battipaglia, Remedial Project Manager. He will respond to your request.

Thanks for your continued interest in the site.

Sincerely,

Cecilia Echols
Community Involvement Coordinator.

Wsodie Cecilia Echols 03/05/2012 01:59:23 PM

From: Wsodie@aol.com
To: Cecilia Echols/R2/USEPA/US@EPA
Cc: [redacted]
Date: 03/05/2012 01:59 PM
Subject: Extension request

Cecilia Echols
Community Involvement Coordinator
USEPA, Region 2

Dear Ms. Echols

On behalf of CRISIS, Inc., I am hereby requesting an extension of the public comment period on the Proposed Remedial Action Plan (Proposed Plan) for the American Cyanamid (Pfizer) Superfund site in Bridgewater, NJ.

We ask you to consider the following points in support of this request:

- The time allotted between the public release of the Proposed Plan and the date of public meeting (March 8, 2012) was not sufficient for us to complete our review of the plan; discuss it among our Board and technical advisor; develop a position to submit to our membership and other interested parties; receive comments from the foregoing; and develop testimony and comments for the public meeting. We will need additional time following the public meeting to make up for this shortfall.

- CRISIS requested extensions of the public comment period for the three previous Proposed Plans that were developed for the site, in 1993, 1996 and 1998, and they were granted each time (NJDEP was the lead agency during that period).

- The site is considered by EPA to be one of the most complex Superfund sites in the country. This complexity requires us to spend considerable time reviewing the proposed remedy.

Thank you for your consideration of this request.

Walt Sodie
Executive Director
CRISIS

C R I S I S

925 Brown Rd.   Bridgewater, NJ 08807

April 30, 2012 (*Sent via e-mail this date*)

Joseph Battipaglia
Remedial Project Manager
USEPA Region 2
battipaglia.joseph@epa.gov

Dear Mr. Battipaglia:

We are submitting this communication in follow-up to statements we entered into the record at the March 8, 2012 EPA-conducted public hearing on remediation plans for the American Cyanamid (Pfizer) Superfund site. The points that follow supplement oral statements that were given by CRISIS Technical Advisor Thomas Germinario, CRISIS Board Chairman Ross Stander and myself, and Mr. Germinario's letter of March 6, 2012 to you ("*Re: Site-Wide Feasibility Study and Proposed Remedial Action Plan, American Cyanamid Superfund Site*"). Some of the material reiterates sections of our March 8 presentations that require more emphasis.

CRISIS recognizes that EPA is cognizant of some of the points to be made below and that EPA may have already planned to implement some of the suggestions. They are included not only for EPA's consumption but also for review by other interested parties.

While CRISIS does not object to EPA's preferred remedy of solidification/stabilization (S/S), we strongly believe that the plan should be bolstered by implementation of the measures that follow.

Conditions for Implementing Solidification/Stabilization (S/S) Remedy

CRISIS wishes to stress the importance we place on the five bulleted points on page 3 of Mr. Germinario's letter referred to above. These proposed steps, repeated immediately below, not only are conditions for our support of EPA's preferred remedy but are actions we believe are essential for inclusion in the Record of Decision:

- Long-term groundwater treatment should rely on an on-site system designed specifically for the site's contaminants, NOT on the Somerset-Raritan Valley Sewerage Authority's (SRVSA) municipal wastewater treatment system.
- Interim groundwater treatment at the SRVSA should be subject to enforceable effluent limitations for VOCs and SVOCs.
- Materials in the floodplain requiring direct contact, vapor or movement control should be relocated to the Main Plant area and covered by the appropriate engineered multi-layered cap.
- All principal threat wastes should be consolidated in Impoundments 3, 4 and 5 for *in-situ* s/s treatment.

- Bench-scale testing should be conducted during the remedial design phase to determine the most effective combination of amendments, stabilizing agents and geogrids to be used in the *in-situ* s/s process.

Our conditions for groundwater treatment are crucial. The impoundments to be treated with S/S are located in the Main Plant Area where the groundwater flow is controlled by the bedrock pumping wells. Therefore, any leaching of organics will be drawn down into the groundwater recovery system and sent for treatment. Currently, this treatment is being done at the SRVSA, with which CRISIS is not satisfied. (*We have repeatedly asked for an engineering analysis of SRVSA's capabilities to treat VOC/SVOC wastes and never gotten any response. The typical municipal-type sewage treatment plant is not equipped to remove these wastes without some degree of pre-treatment.*) If CRISIS is successful in getting Pfizer to design and build a state-of-the-art, on-site dedicated groundwater treatment plant, the site will then have a much stronger system that will protect the environment, even if some leaching of organics occurs from the S/S impoundments.

The condition calling for bench-scale testing (*done in a simulated environment*) is also critical; its implementation would assure that the best possible S/S technology will be used. Here is more detail on bench-testing techniques CRISIS is asking EPA to order:

> We favor re-remediation testing of various types of S/S treatment to determine the optimal method of immobilizing the unique mix of organic contaminants at this site. There are leaching procedure test methods that have been approved by USEPA for simulating how the S/S treated material will perform in its intended disposal site. These leaching procedures can accurately predict the rate at which organic compounds will leach under the influence of simulated rain and groundwater.

Flooding and the Danger of Cap Erosion

A few speakers at the March 8 EPA public hearing cited frequent flooding as an argument against S/S, contending that floodwaters will wash away caps covering the waste impoundments and release hazardous waste into the water.

While the entire Cyanamid site is in the Raritan River's floodplain, there is a substantial difference between the risks associated with wastes stored inside and outside the Main Plant area. As discussed above, the groundwater in the Main Plant area is controlled by the bedrock pumping system and can be treated if contaminants escape as a result of flooding. Also, the Main Plant is surrounded by a flood dike which slows the rate at which flood waters enter and recede from that area. Therefore, the risk of contaminants being washed away by the uncontrolled force of floodwaters is much less within the Main Plant area than outside it. Nevertheless, the threat demands that EPA impose rigorous conditions to mitigate flood damage.

The Site-wide Feasibility Study indicates that the caps to be used in the Main Plant area will be multi-layered and engineered to withstand the stress of periodic flooding. That will be done during the Remedial Design phase, and CRISIS will monitor the process closely. However, the Record of Decision should require that the highest attainable engineering standards be used in constructing the caps. In this regard, cost should not be a consideration. No matter how high the cost, Pfizer must be required to design, engineer and construct the caps for maximum resistance to floodwaters.

Additionally, we request that the following conditions be included in the Record of Decision:

- The impoundments must be much better protected than in recent extreme flooding. Specifically, the berm around the main plant area must be improved to withstand a "500-year" flood, a magnitude that has been reached or approached several times at the site. The improvement should be both in height and strength of the berm.

- The Remedial Design must specify a means to firmly secure the S/S material under the soil caps to prevent contaminants from being washed out in serious, repeated floods.

- The caps and the berm should be heavily armored at points of highest water flow velocity, as experienced during Hurricane Irene.

- The ground water pumping system must be protected against electricity failure in storms, including maintenance of large backup generators on high ground, and allowing for proper water runoff into the outflow brook.

Low Temperature Thermal Desorption Inappropriate for Cyanamid Site

A small number of environmental groups with no previous involvement at the site called for LTTD to be used for the most severely contaminated sections: impoundments 3, 4 and 5.

LTTD involves in-place thermal treatment that causes contaminants to separate (desorb) from the soil without burning. CRISIS's extensive review of engineering and environmental reports and studies indicates that the process is not a suitable remedy for impoundments 3, 4 and 5.

CRISIS has been studying and responding to actual and potential remedies for this highly contaminated site for over 20 years and has substantial knowledge of the waste characteristics and past attempts to treat a wide range of deadly substances there. To document our position that LTTD is not the appropriate remedy for these impoundments, CRISIS developed the following points from our review of engineering and environmental reports and studies*:

- LTTD is a poor choice for a heterogeneous mix of volatile and semi-volatile organic compounds (VOCs & SVOCs). LTTD uses heat to vaporize the organic contaminants so that they are driven off the waste and captured for treatment. Therefore, LTTD has to operate in the temperature range between the boiling point and the combustion temperature of the organic compound. Since SVOCs have a much higher boiling point than VOCs, completely vaporizing a mix of VOCs and SVOCs would require a higher temperature than would be safe to use, because it would be too close to the flashpoint of the VOCs.

- Just one example: The Sidney Tar Sands site in Nova Scotia, Canada called for remediation of a number of tar ponds having a heterogeneous mix of VOCs and SVOCs, including Benzene, Xylenes, Toluene and Naphthalene, which are also the principal organic contaminants of Cyanamid's Impoundments 3, 4 and 5. After extensive studies, the selected remedy (2007) was solidification/stabilization (S/S) technology, <u>not</u> LTTD.

- Anyone with any degree of familiarity with Impoundments 3, 4 & 5 would conclude that LTTD is not a good fit. It works well primarily with soils that are contaminated with PHC (petroleum hydrocarbons). The contaminants have to be relatively homogeneous because there's a specific range of temperatures that needs to be applied to volatize the contaminants while not oxidizing (burning) them. Also, the sticky tar consistency of this waste (Impoundments 3, 4 & 5) would make a mess in an LTTD system. The tar would have to be processed into a fine granular material. That would be a difficult task in itself, and would almost surely result in large fugitive emissions of VOCs (Volatile Organic Compounds) during the material processing.

General

Because of the complexity of the Cyanamid site, the large-scale distribution of hazardous waste in the impoundments and soils, and the threat of frequent flooding, EPA must impose the most stringent possible standards for the current phase of the remediation and vigilantly monitor every step of the remediation process. Furthermore, EPA should require Pfizer and/or its successors to monitor the site in perpetuity (*under EPA supervision*) and to make repairs that may be required to meet the conditions of all Records of Decision issued for site remediation. This would include the flood berm, impoundments, groundwater pumping system, interceptor trench, slurry wall, treatment facilities, effluent gates, etc. If EPA deems it appropriate to assure compliance, Pfizer could be required to post a bond to protect the community in case of financial changes in the company's future or sale of Pfizer or the Cyanamid site to another firm. As stated above, cost should not be a consideration in these decisions.

Thank you for your consideration of this communication.

Walt Sodie
Executive Director
CRISIS

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* *Following is a list of references for our position that S/S technology is more appropriate than LTTD for impoundments 3, 4 & 5. While not every one of the sources provided the explicit information contained in the three bullet points regarding LTTD, they indicate the difficulties of applying LTTD to mixed wastes. Some of the sources were not directly researched by CRISIS but were cited by reference material that was examined.*

http://en.wikipedia.org/wiki/Sydney_Tar Ponds.

http://www.epa.gov/oust/cat/LTTD.HTM.

Applying Solidification/Stabilization for Sustainable Redevelopment of Contaminated Property - (Charles M. Wilk LEHP, QEP, LEED AP, Program Manager, Waste Treatment, Portland Cement Association.

Conner, J.R. *Chemical Fixation and Solidification of Hazardous Wastes*; Van Nostrand, Reinhold: New York.

Technology Resource Document—Solidification/Stabilization and Its Application to Waste Materials; EPA 530/R-93/012; U.S. Environmental Protection Agency.

Innovative Treatment Technologies for Site Cleanup: Annual Status Report, 12th Edition; EPA 542-R-07-012; U.S. Environmental Protection Agency.

Engineering Bulletin—Solidification/Stabilization of Organics and Inorganics; EPA 540/S-92/015; U.S. Environmental Protection Agency.

Weitzman, L.; Conner, J.R. Descriptions of Solidification/Stabilization Technologies. In *Immobilization Technology Seminar—Speaker Slide Copies and Supporting Information*; CERI-89-222; U.S. Environmental Protection Agency.

Conner, J.R. *Guide to Improving the Effectiveness of Cement-Based Stabilization/Solidification*; EB211; Portland Cement Association: Skokie, IL.

Pozzolan—a siliceous or siliceous and aluminous material which in itself possess little or no cementitious value, but which will, in finely divided form and in the presence of moisture, chemically react with calcium hydroxide at ordinary temperature to form compounds possessing cementitious properties. *Standard Terminology Relating to Hydraulic Cement*, ASTM C 219-98.

Stabilization/Solidification of CERCLA and RCRA Wastes—Physical Tests, Chemical Testing Procedures, Technology Screening, and Field Activities; EPA 625/6-89/022; U.S. Environmental Protection Agency.

Einhaus, R.L.; Erickson, P. *Fate of Polychlorinated Biphenyls (PCBs) in Soil Following Stabilization with Quicklime;* EPA 600/2-91/052; U.S. Environmental Protection Agency.

Guide Specification for Military Construction—Solidification/Stabilization of Contaminated Material; CEGS-02445; U.S. Army Corps of Engineers.

Delisio, R. *Cement-Based Solidification/Stabilization on Brownfield Sites in New Jersey, USA* Presented at the Cement Association of Canada, Remediation Technology Workshop: Solidification and Stabilization Treatment, Toronto, Ontario, Canada, (unpublished).

Wilk, C.M.; DeLisio, R. *Solidification/Stabilization Treatment of Arsenic- and Creosote-Impacted Soil at a Former Wood-Treating Site*; SR99.

Wilk, C.M.; Germano, M. Remediation of Lead- and Petroleum-Contaminated Soils at a Boston Brownfield Site Using Cement-Based Solidification/Stabilization. In *Proceedings of the International Containment & Remediation Technology Conference, Orlando, FL.*

American Cyanamid Public Comment
bridget
to:
Joseph Battipaglia
03/19/2012 10:49 AM
Hide Details
From: <bridget@edisonwetlands.org>

To: Joseph Battipaglia/R2/USEPA/US@EPA

History: This message has been forwarded.

1 Attachment

Bridget Donnellan American Cyanamid Public Comment.pdf

Dear Joe,

I have attached my comment from the public hearing the other week because I didn't have the opportunity to talk. Thank you so much for your time!

-Bridget Donnellan

EWA

Bridget Donnellan, Conservation Intern
Edison Wetlands Association
Statement to EPA at Public Hearing
March 8, 2012

Thank you for the opportunity to send comments, my name is Bridget Donnellan and I am a Conservation Intern at the Edison Wetlands Association and I am sending in my comment to show my support for alternative 7 and the benefits that this option would provide for the community because I was not able to speak at the meeting because of time constraints.

After looking over the alternatives, option 7 is the only option that will actually clean up the toxins left behind by the Pfizer Corporation in the community. This plan, as we have heard before this will dramatically increase flooding in the community, something that they simply cannot handle. In the past few weeks, I have personally spoken to countless residents of the Bridgewater/ Bound Brook communities and have heard numerous stories of the floods that have damaged the town previously. Some residents are still reliving the horrors of Hurricane Irene, telling stories such as how they were forced to take boats from their second story windows to escape the rising water. If the plan is to further traumatize the residents, then I think that accepting option 4A would be the perfect plan.

As an Environmental Policy, Institutions and Behavior major at Rutgers University, I am able to fully appreciate the long term effects that this decision will have upon the community. If the EPA understands that the area is going to frequently be underwater, I cannot understand why option 4A is even being considered. A cap is not a clean up and these problems will return to this area the minute the cap breaks, costing the EPA and Pfizer even more money than it would have to chose alternative 7 in the first place. I urge you to choose the health of the community over the price tag that the clean up will have and vote for option 7. Thank you for your time.

Edison Wetlands Association, Inc. ♦ 206 Tyler Road ♦ Edison, New Jersey 08820
Telephone 732-321-1300 ♦ Fax 732-372-7866 ♦ www.edisonwetlands.org

EWA

change.org

To: The Governor of NJ, State Rep. Upendra Chivukula (NJ-017B), State Sen. Samuel Thompson (NJ-012), Rep. Rush Holt (NJ-12), Sen. Barbara Boxer (CA), USEPA Region 2 Administrator (Judith Enck), USEPA Administrator (Lisa Jackson), Commissioner (Bob Martin), USEPA Region 2 Superfund Chief (Walter Mugdan), Pfizer (Wendy Lazarus), Pfizer (Russell Downey)

Subject: Stop toxic cancer-causing chemicals from seeping into the Raritan River!

Letter: Greetings,

I respectfully request that you strongly compel the United States Environmental Protection Agency (USEPA) to take immediate action to stop the toxic, cancer-causing chemical seep draining into the Raritan River from the 80-year old American Cyanamid Superfund Site in Bridgewater.

The 575-acre site sits directly adjacent to the longest river solely in New Jersey, as well as the Delaware and Raritan Canal, which is used for drinking water for hundreds of thousands of families in the surrounding area. The USEPA recently discovered benzene, a toxic carcinogen known to potentially cause damage to the immune system, oral cancer, and leukemia on the American Cyanamid Superfund Site at 20,000 times the acceptable federal standard.

The site's leaking chemical lagoons, known as lagoons 1 and 2, must be cleaned up immediately. Please tell the USEPA that erecting a temporary Band-Aid of carbon bags and hay bales along the bank to "catch" the seeps is not acceptable. Additionally, I ask that you request the USEPA to require the site's Responsible Party, Pfizer, a billion dollar pharmaceutical company, to fully remediate the on-site historic lagoons from this leaking toxic waste site that is causing this potential health hazard.

This site cleanup has been languishing for over two decades, and it is time for USEPA to take serious action. In order to protect the health and safety of families that utilize this area for recreation, the source of this contamination must be addressed immediately. For the bikers, hikers, fisherman and kayakers, for the osprey, bald eagles, turtles and trout, please urge USEPA to make this site cleanup a top priority and to take immediate action to remove the toxic chemicals draining into our regional resource, the Raritan River. Thank you for your timely assistance on this important environmental issue.

Respectfully,

Signatures

Name	Location	Date
[redacted]	Edison, New Jersey, United States	2011-06-24
[redacted]	Linden, New Jersey, United States	2011-06-24
[redacted]	West Orange, New Jersey, United States	2011-06-24
[redacted]	Monmouth Junction, New Jersey, United States	2011-06-24
[redacted]	Edison , New Jersey, United States	2011-06-24
[redacted]	Forest Hills, New York, United States	2011-06-24
[redacted]	West Orange, New Jersey, United States	2011-06-24
[redacted]	Bridgeton, New Jersey, United States	2011-06-24
[redacted]	Fair Lawn, New Jersey, United States	2011-06-24
[redacted]	Kendall park, New Jersey, United States	2011-06-24
[redacted]	PERTH AMBOY, New Jersey, United States	2011-06-24
[redacted]	Roselle, New Jersey, United States	2011-06-24
[redacted]	W Allenhurst, New Jersey, United States	2011-06-24
[redacted]	Glen Ridge, New Jersey, United States	2011-06-24
[redacted]	Montville, New Jersey, United States	2011-06-24
[redacted]	Arlington, Texas, United States	2011-06-24
[redacted]	Cherry Hill, New Jersey, United States	2011-06-24
[redacted]	Maplewood, New Jersey, United States	2011-06-24
[redacted]	Lawrenceville, New Jersey, United States	2011-06-24
[redacted]	Kettering, United Kingdom	2011-06-24
[redacted]	Scranton, Pennsylvania, United States	2011-06-24
[redacted]	St. Pölten, Austria	2011-06-24
[redacted]	Gabrovo, Bulgaria	2011-06-24
[redacted]	Salem, Oregon, United States	2011-06-24
[redacted]	Liverpool, United Kingdom	2011-06-24
[redacted]	Fair Oaks, California, United States	2011-06-24
[redacted]	Chicago, Illinois, United States	2011-06-24
[redacted]	Pasadena, Maryland, United States	2011-06-24

Name	Location	Date
[redacted]	Spotsylvanià, Virginia, United States	2011-06-24
[redacted]	Brewster, New York, United States	2011-06-24
[redacted]	Anadia, Portugal	2011-06-24
[redacted]	Weymouth, Canada	2011-06-24
[redacted]	Suva, Hawaii, United States	2011-06-24
[redacted]	JACKSON HEIGHTS, New York, United States	2011-06-24
[redacted]	springfield, Ohio, United States	2011-06-24
[redacted]	Sacaton, Arizona, United States	2011-06-24
[redacted]	Manchester, New Hampshire, United States	2011-06-24
[redacted]	stavanger, Nevada, United States	2011-06-24
[redacted]	Pompton Lakes, New Jersey, United States	2011-06-24
[redacted]	Randolpj, New Jersey, United States	2011-06-24
[redacted]	Oakhurst, New Jersey, United States	2011-06-24
[redacted]	London, United Kingdom	2011-06-24
[redacted]	Sauk City, Wisconsin, United States	2011-06-24
[redacted]	London, Canada	2011-06-24
[redacted]	Chicago, Illinois, United States	2011-06-24
[redacted]	timisoara, Romania	2011-06-24
[redacted]	Haddonfield, New Jersey, United States	2011-06-24
[redacted]	Pipersville, Pennsylvania, United States	2011-06-24
[redacted]	Concord, California, United States	2011-06-24
[redacted]	Saratoga, California, United States	2011-06-24
[redacted]	Berlin, Germany	2011-06-24
[redacted]	rancho cordova, California, United States	2011-06-24
[redacted]	Spring Hope, North Carolina, United States	2011-06-24
[redacted]	Bethlehem, Pennsylvania, United States	2011-06-24
[redacted]	johnson city, Tennessee, United States	2011-06-24
[redacted]	West Orange, New Jersey, United States	2011-06-24

Name	Location	Date
[redacted]	boca raton, Florida, United States	2011-06-24
	brooklyn, New York, United States	2011-06-24
	Shortsville, New York, United States	2011-06-24
	Hertford, United Kingdom	2011-06-24
	Davis, California, United States	2011-06-24
	West Haven, Connecticut, United States	2011-06-24
	Fargo, North Dakota, United States	2011-06-24
	Manitou Springs, Colorado, United States	2011-06-24
	New York, New York, United States	2011-06-24
	Hagerstown, Maryland, United States	2011-06-24
	Framingham, Massachusetts, United States	2011-06-24
	Webb City, Missouri, United States	2011-06-24
	Chicago, Illinois, United States	2011-06-24
	buenos aires, Argentina	2011-06-24
	Joppa, Maryland, United States	2011-06-24
	Rijeka, Croatia	2011-06-24
	Northfield, United States	2011-06-24
	Adelaide, Australia	2011-06-24
	Honolulu, Hawaii, United States	2011-06-24
	Chicago, Illinois, United States	2011-06-24
	oklahoma city, Oklahoma, United States	2011-06-24
	Pearl City, Hawaii, United States	2011-06-24
	chihuahua, Maine, United States	2011-06-24
	london, United Kingdom	2011-06-24
	Finleyville, Pennsylvania, United States	2011-06-25
	Amersfoort, Netherlands	2011-06-25
	Ottawa, Canada	2011-06-25
	Basel, Switzerland	2011-06-25
	Peconic, New York, United States	2011-06-25

Name		Location	Date
[redacted]		Olympia, Washington, United States	2011-06-25
		Hasselt, Belgium	2011-06-25
		Zagreb, Croatia	2011-06-25
		savona, Italy	2011-06-25
		Langley Park, Durham, United Kingdom	2011-06-25
		Como, Australia	2011-06-25
		Indianapolis, Indiana, United States	2011-06-25
		Chicago, Illinois, United States	2011-06-25
		North Olmsted, Ohio, United States	2011-06-25
		St. Louis Park , Minnesota, United States	2011-06-25
		Slate Hill, New York, United States	2011-06-25
		Verona, Italy	2011-06-25
		Perkasie, Pennsylvania, United States	2011-06-25
		Mansfield Center, Connecticut, United States	2011-06-25
		Mansfield Center, Connecticut, United States	2011-06-25
		Chicago, Illinois, United States	2011-06-25
		San Francisco, California, United States	2011-06-25
		Sussex, Wisconsin, United States	2011-06-25
		Bushkill, Pennsylvania, United States	2011-06-25
		Mount Vernon, Kentucky, United States	2011-06-25
		Stratford, Canada	2011-06-25
		barcelona, Spain	2011-06-25
		Pierrelatte, France	2011-06-25
		Revigny-sur-Ornain, France	2011-06-25
		Helena, Arkansas, United States	2011-06-25
		Oakand, California, United States	2011-06-25
		Kansas City, Missouri, United States	2011-06-25
		tampa, Florida, United States	2011-06-25

Name	Location	Date
[redacted]	NYC, New York, United States	2011-06-25
	Kraków, Poland	2011-06-25
	Los Angeles, California, United States	2011-06-25
	Omaha, Nebraska, United States	2011-06-25
	Toms River, New Jersey, United States	2011-06-25
	laval, Canada	2011-06-25
	Garden City, Michigan, United States	2011-06-25
	Detroit, Michigan, United States	2011-06-25
	west orange, New Jersey, United States	2011-06-25
	SAINT LEU LA FORET, France	2011-06-25
	Des Moines, Iowa, United States	2011-06-25
	Casa Grande, Arizona, United States	2011-06-25
	los Angeles, California, United States	2011-06-25
	SAINT LEU LA FORET, France	2011-06-25
	West New York, New Jersey, United States	2011-06-25
	Tacoma, Washington, United States	2011-06-25
	Langley, Canada	2011-06-25
	Newtown, Connecticut, United States	2011-06-25
	glendale, Arizona, United States	2011-06-25
	jackson, New Jersey, United States	2011-06-25
	sana'a, Yemen	2011-06-25
	Portland, Oregon, United States	2011-06-25
	Jackson, New Jersey, United States	2011-06-25
	N. Ireland, United Kingdom	2011-06-26
	Krefeld, Germany	2011-06-26
	Chicago, Illinois, United States	2011-06-26
	Hesperia, California, United States	2011-06-26
	Palermo, Italy	2011-06-26
	Boe i Telemark, Norway	2011-06-26

Name	Location	Date
[redacted]	El Segundo, California, United States	2011-06-26
[redacted]	Guelph, Canada	2011-06-26
[redacted]	Prairie Village, Kansas, United States	2011-06-26
[redacted]	Findlay, Ohio, United States	2011-06-26
[redacted]	Highland Village, Texas, United States	2011-06-26
[redacted]	Valley Stream, New York, United States	2011-06-26
[redacted]	Aliquippa, Pennsylvania, United States	2011-06-26
[redacted]	Nanuet, New York, United States	2011-06-26
[redacted]	Flushing, New York, United States	2011-06-26
[redacted]	rockville, Maryland, United States	2011-06-26
[redacted]	Whiting, New Jersey, United States	2011-06-26
[redacted]	Cambridge, Massachusetts, United States	2011-06-26
[redacted]	Springfield, Missouri, United States	2011-06-26
[redacted]	Murfreesboro, Tennessee, United States	2011-06-26
[redacted]	Greenbelt, Maryland, United States	2011-06-26
[redacted]	Lady Lake, Florida, United States	2011-06-26
[redacted]	New Haven, Connecticut, United States	2011-06-26
[redacted]	Torre del Mar, Spain	2011-06-26
[redacted]	South Park, Pennsylvania, United States	2011-06-26
[redacted]	Philadelphia, Pennsylvania, United States	2011-06-26
[redacted]	Elmira, New York, United States	2011-06-26
[redacted]	Irving, Texas, United States	2011-06-26
[redacted]	Sherwood, Ohio, United States	2011-06-26
[redacted]	Vacaville, California, United States	2011-06-26
[redacted]	Jundiaí/SP, Brazil	2011-06-26
[redacted]	Fair Play, South Carolina, United States	2011-06-26
[redacted]	Tifton, Georgia, United States	2011-06-26
[redacted]	Blacksburg, Virginia, United States	2011-06-26
[redacted]	Jamaica Plain, Massachusetts, United States	2011-06-26

Name	Location	Date
[redacted]	ALTON, Illinois, United States	2011-06-26
	Knox, Indiana, United States	2011-06-26
	Gainesville, Florida, United States	2011-06-26
	San Diego, California, United States	2011-06-26
	palermo, Italy	2011-06-26
	Staten Island, New York, United States	2011-06-26
	Westerkappeln, Germany	2011-06-26
	Niagara Falls, Canada	2011-06-26
	Argentona, Spain	2011-06-26
	San Anselmo, California, United States	2011-06-26
	Oshkosh, Wisconsin, United States	2011-06-26
	Stillwater, Minnesota, United States	2011-06-26
	Winnipeg, Canada	2011-06-26
	Jersey City, New Jersey, United States	2011-06-26
	Hood River, Oregon, United States	2011-06-26
	Bethesda, Ohio, United States	2011-06-26
	San Francisco, California, United States	2011-06-26
	Long Beach, California, United States	2011-06-26
	Perth Amboy, New Jersey, United States	2011-06-26
	Mokena, Illinois, United States	2011-06-26
	Leiderdorp, District Of Columbia, United States	2011-06-26
	Melvindale, Michigan, United States	2011-06-26
	Forest Hills, New York, United States	2011-06-26
	Pearl City, Hawaii, United States	2011-06-26
	FORT WORTH, Texas, United States	2011-06-26
	kingston, Tennessee, United States	2011-06-26
	cincinnati, Ohio, United States	2011-06-26
	Lackawaxen, Pennsylvania, United States	2011-06-26
	Jamaica, New York, United States	2011-06-26

Name		Location	Date
[redacted]		Murrieta, California, United States	2011-06-26
		Bloomington, Minnesota, United States	2011-06-26
		Danville, Pennsylvania, United States	2011-06-26
		West Orange, New Jersey, United States	2011-06-26
		San Diego, California, United States	2011-06-26
		red bank, New Jersey, United States	2011-06-26
		santa monica, California, United States	2011-06-26
		Ventura, California, United States	2011-06-26
		Bellingham, Washington, United States	2011-06-26
		Auburn Hills, Michigan, United States	2011-06-26
		St Augustine, Florida, United States	2011-06-26
		New York, New York, United States	2011-06-26
		Santa Fe, New Mexico, United States	2011-06-26
		Plainfield, New Jersey, United States	2011-06-26
		Santa Cruz, California, United States	2011-06-26
		Cockeysville, Maryland, United States	2011-06-26
		De Land, Florida, United States	2011-06-26
		Sidney, Canada	2011-06-26
		daytona beach, Florida, United States	2011-06-26
		Clanton, Alabama, United States	2011-06-26
		la selva beach, California, United States	2011-06-26
		Willemstad, Netherlands Antilles	2011-06-26
		Kathmandu, Nepal	2011-06-26
		Brisbane, Australia	2011-06-26
		Brooklyn, New York, United States	2011-06-26
		Lake City, Florida, United States	2011-06-26
		Phoenix, Arizona, United States	2011-06-26
		Long Branch, New Jersey, United States	2011-06-26
		Brooklyn, New York, United States	2011-06-26
		Chattanooga, Tennessee, United States	2011-06-26

Name	Location	Date
[redacted]	Albuquerque, New Mexico, United States	2011-06-26
	Madrid/Spain, Alabama, United States	2011-06-26
	Ojai,, California, United States	2011-06-26
	Kenmore, Washington, United States	2011-06-26
	Boulder, Colorado, United States	2011-06-26
	brooklyn, New York, United States	2011-06-26
	Kansas City, Kansas, United States	2011-06-26
	Front Royal, Virginia, United States	2011-06-26
	Centre hall, Puerto Rico, United States	2011-06-26
	Garden Grove, California, United States	2011-06-26
	Henley, Maryland, United States	2011-06-26
	Allison Park, Pennsylvania, United States	2011-06-26
	Poland, Indiana, United States	2011-06-26
	Rochester, New York, United States	2011-06-26
	Sulphur Springs, Texas, United States	2011-06-26
	sf, California, United States	2011-06-26
	Washington, District Of Columbia, United States	2011-06-26
	Philadelphia, Pennsylvania, United States	2011-06-26
	Little Rock, Arkansas, United States	2011-06-26
	bullvalley, Illinois, United States	2011-06-26
	Saratoga, California, United States	2011-06-26
	Honolulu, Hawaii, United States	2011-06-26
	west park, Florida, United States	2011-06-26
	Des Moines, Washington, United States	2011-06-26
	Ellicott City, Maryland, United States	2011-06-26
	Sioux Falls, South Dakota, United States	2011-06-26
	MIDDLETOWN, New York, United States	2011-06-26
	Novokuznetsk, Federated States of Micronesia, United States	2011-06-26
	Pomona, California, United States	2011-06-26

Name		Location	Date
[redacted]		istanbul turkey, District Of Columbia, United States	2011-06-26
		San Diego, California, United States	2011-06-26
		perth,scotland, United Kingdom	2011-06-26
		milton, Georgia, United States	2011-06-26
		Sonoma, California, United States	2011-06-26
		San Pedro, California, United States	2011-06-26
		Port Orford, Oregon, United States	2011-06-26
		New York, New York, United States	2011-06-26
		Mashpee, Massachusetts, United States	2011-06-26
		San Anselmo, California, United States	2011-06-26
		Adelaide, Australia	2011-06-26
		glen waverley, Australia	2011-06-26
		Rockport, Washington, United States	2011-06-26
		Samara, Ohio, United States	2011-06-26
		los angles, California, United States	2011-06-26
		Pittsburg, California, United States	2011-06-26
		Los Angeles, California, United States	2011-06-26
		Downers Grove, Illinois, United States	2011-06-26
		Monterrey, Mexico	2011-06-26
		Lucknow, India	2011-06-26
		Ragusa, Italy	2011-06-26
		Murrumbateman, Australia	2011-06-26
		Kihei, Hawaii, United States	2011-06-27
		Hewitt, New Jersey, United States	2011-06-27
		Granger, Indiana, United States	2011-06-27
		New York, New York, United States	2011-06-27
		San Francisco, California, United States	2011-06-27
		Pleasant Hill, California, United States	2011-06-27
		Zagreb, California, United States	2011-06-27

Name	Location	Date
[redacted]	Kirke Saaby, Denmark	2011-06-27
	Bandung, Indonesia	2011-06-27
	N. Saanich, Canada	2011-06-27
	Racine, Wisconsin, United States	2011-06-27
	ROME, Italy	2011-06-27
	rotterdam, Netherlands	2011-06-27
	London,, United Kingdom	2011-06-27
	Costa Mesa, California, United States	2011-06-27
	Parvenets, Bulgaria	2011-06-27
	Florina, Greece	2011-06-27
	Piraeus, Greece	2011-06-27
	Prague 4, Czech Republic	2011-06-27
	baia mare, Romania	2011-06-27
	Beverley Hills, Australia	2011-06-27
	piraeus, Greece	2011-06-27
	osijek, Croatia	2011-06-27
	Leicestershire, United Kingdom	2011-06-27
	Durban, South Africa	2011-06-27
	Bristol, United Kingdom	2011-06-27
	MIKOLOW, Poland	2011-06-27
	Sidmouth, United Kingdom	2011-06-27
	Brisbane, Australia	2011-06-27
	stockholm, Sweden	2011-06-27
	brooklyn, New York, United States	2011-06-27
	Hamilton, New Jersey, United States	2011-06-27
	albano laz., Wyoming, United States	2011-06-27
	Loxahatchee, Florida, United States	2011-06-27
	NY, New York, United States	2011-06-27
	Freiburg, Germany	2011-06-27
	Boston, Massachusetts, United States	2011-06-27

Name	Location	Date
[redacted]	Aurora, Illinois, United States	2011-06-27
	Vaasa, Finland	2011-06-27
	Benamaurel, Spain	2011-06-27
	Eastton, Kansas, United States	2011-06-27
	bloomington, Indiana, United States	2011-06-27
	Gold Coast, Qld. , Australia	2011-06-27
	Karachi, Pakistan	2011-06-27
	Melbourne, Florida, United States	2011-06-27
	Pennsburg, Pennsylvania, United States	2011-06-27
	lodz, Poland	2011-06-27
	Chicago, Illinois, United States	2011-06-27
	Ringoes, New Jersey, United States	2011-06-27
	Wheaton, Illinois, United States	2011-06-27
	London, United Kingdom	2011-06-27
	Aberdeen, United Kingdom	2011-06-27
	Jerusalem, Israel	2011-06-27
	racine, Wisconsin, United States	2011-06-27
	Fort Wayne, Indiana, United States	2011-06-27
	Bremerton, Washington, United States	2011-06-27
	Paradise, Michigan, United States	2011-06-27
	New Haven, Connecticut, United States	2011-06-27
	Lancaster, United Kingdom	2011-06-27
	Bethel Park, Pennsylvania, United States	2011-06-27
	milan, Italy	2011-06-27
	Villa Gobernador Galvez, Argentina	2011-06-27
	swansea, United Kingdom	2011-06-27
	Brooklyn, New York, United States	2011-06-27
	park Falls, Wisconsin, United States	2011-06-27
	Dawson, Iowa, United States	2011-06-27

Name	Location	Date
[redacted]	Toronto, Canada	2011-06-27
	Poca, West Virginia, United States	2011-06-27
	Krsko, Slovenia	2011-06-27
	Gastonia, North Carolina, United States	2011-06-27
	Lexington, Kentucky, United States	2011-06-27
	Xalapa, Mexico	2011-06-27
	San Diego, California, United States	2011-06-27
	Myrtle Creek, Oregon, United States	2011-06-27
	Dayton, Ohio, United States	2011-06-27
	San Francisco, California, United States	2011-06-27
	Sacrofano, Italy	2011-06-27
	Greeneville, Tennessee, United States	2011-06-27
	Cambridge, Massachusetts, United States	2011-06-27
	Knutsford, United Kingdom	2011-06-27
	Buffalo, New York, United States	2011-06-27
	Mosheim, Tennessee, United States	2011-06-27
	clifton, New Jersey, United States	2011-06-27
	Montrose, Colorado, United States	2011-06-27
	Eching, Germany	2011-06-27
	Monroe, New Jersey, United States	2011-06-27
	Munhall, Pennsylvania, United States	2011-06-27
	MOUNT LAUREL, New Jersey, United States	2011-06-27
	Chicago, Illinois, United States	2011-06-27
	Toms River, New Jersey, United States	2011-06-27
	Tampa, Florida, United States	2011-06-27
	Beaverton, Oregon, United States	2011-06-27
	Phoenix, Arizona, United States	2011-06-27
	METUCHEN, New Jersey, United States	2011-06-27
	Brooklyn, Connecticut, United States	2011-06-27

Name		Location	Date
[redacted]		Reseda, California, United States	2011-06-27
		Edison, New Jersey, United States	2011-06-27
		Madison, Wisconsin, United States	2011-06-27
		Knoxville, Tennessee, United States	2011-06-27
		Warszawa, Poland	2011-06-27
		Hillsborough, New Jersey, United States	2011-06-27
		Berlin, Massachusetts, United States	2011-06-27
		Novato, California, United States	2011-06-27
		Dublin, Alabama, United States	2011-06-27
		Upper Lake, California, United States	2011-06-27
		Roma, Italy	2011-06-27
		Hempstead, New York, United States	2011-06-27
		Vista, California, United States	2011-06-27
		Longmont, Colorado, United States	2011-06-27
		Seven Valleys, Pennsylvania, United States	2011-06-27
		Rancho Palos Verdes, California, United States	2011-06-27
		Nashville, Tennessee, United States	2011-06-27
		Rhodes Island, Greece	2011-06-27
		Chatham, New Jersey, United States	2011-06-27
		Ft Pierce, Florida, United States	2011-06-27
		Keyport, New Jersey, United States	2011-06-27
		Dana, North Carolina, United States	2011-06-27
		Keyport, New Jersey, United States	2011-06-27
		Rogers, Arkansas, United States	2011-06-27
		Edison, New Jersey, United States	2011-06-27
		danbury, Connecticut, United States	2011-06-27
		New York, New York, United States	2011-06-27
		shropshire, United Kingdom	2011-06-27

Name	Location	Date
[redacted]	Pompton Lakes, New Jersey, United States	2011-06-27
	Poplarville, Mississippi, United States	2011-06-27
	Hollywood, Florida, United States	2011-06-27
	Greenville, South Carolina, United States	2011-06-27
	Bennington, Vermont, United States	2011-06-27
	Eugene, Oregon, United States	2011-06-27
	Portland, Oregon, United States	2011-06-27
	Northbrook, Illinois, United States	2011-06-27
	Smyrna, Georgia, United States	2011-06-27
	Veracruz, Mexico	2011-06-27
	Fords, New Jersey, United States	2011-06-27
	Patra, Greece	2011-06-27
	Ft. Myers, Florida, United States	2011-06-27
	Barss Corner, Canada	2011-06-27
	Austell, Georgia, United States	2011-06-27
	Verona, New Jersey, United States	2011-06-27
	Morrisville, Pennsylvania, United States	2011-06-27
	Studio City, California, United States	2011-06-27
	Hohenwart, Germany	2011-06-27
	Dana Point, California, United States	2011-06-27
	San Francisco, California, United States	2011-06-27
	poulsbo, Washington, United States	2011-06-27
	Wilsall, Montana, United States	2011-06-27
	Durban, South Africa	2011-06-27
	Karlsruhe, Germany	2011-06-27
	phoenix, Arizona, United States	2011-06-27
	Millsap, Texas, United States	2011-06-27
	Minneapolis, Minnesota, United States	2011-06-27
	Tokyo, Japan	2011-06-27

Name	Location	Date
[redacted]	dreux, France	2011-06-27
[redacted]	Tucson, Arizona, United States	2011-06-27
[redacted]	Bishop, Texas, United States	2011-06-27
[redacted]	Iowa City, Iowa, United States	2011-06-27
[redacted]	Warsaw, Poland	2011-06-27
[redacted]	NYC, New York, United States	2011-06-27
[redacted]	Leighton Buzzard, United Kingdom	2011-06-27
[redacted]	New York, New York, United States	2011-06-27
[redacted]	roma, Italy	2011-06-27
[redacted]	Eau Claire, Wisconsin, United States	2011-06-27
[redacted]	Whitewater, Wisconsin, United States	2011-06-27
[redacted]	boonton township, New Jersey, United States	2011-06-27
[redacted]	Decatur, Georgia, United States	2011-06-27
[redacted]	Plovdiv, Bulgaria	2011-06-27
[redacted]	Ironton, Missouri	2011-06-27
[redacted]	union, New Jersey, United States	2011-06-27
[redacted]	Anchorage, Alaska, United States	2011-06-27
[redacted]	rock falls, Illinois, United States	2011-06-27
[redacted]	Fontana, California, United States	2011-06-27
[redacted]	Chicago, Illinois, United States	2011-06-27
[redacted]	Norderney, Germany	2011-06-27
[redacted]	naples, Florida, United States	2011-06-27
[redacted]	salt lake city, Utah, United States	2011-06-27
[redacted]	Trieste, Italy	2011-06-27
[redacted]	vlagtwedde, Netherlands	2011-06-27
[redacted]	Santiago, Chile	2011-06-27
[redacted]	Bloomingdale, New Jersey, United States	2011-06-27
[redacted]	Las Cruces,, New Mexico, United States	2011-06-27
[redacted]	Encino, California, United States	2011-06-27

Name	Location	Date
[redacted]	Chandler, Arizona, United States	2011-06-27
[redacted]	Coral Gables, Florida, United States	2011-06-27
[redacted]	Honolulu, Hawaii, United States	2011-06-27
[redacted]	Paramount, California, United States	2011-06-27
[redacted]	Boulder, Colorado, United States	2011-06-27
[redacted]	columbia, Tennessee, United States	2011-06-27
[redacted]	Belvidere, Illinois, United States	2011-06-27
[redacted]	Bayside Hills, New York, United States	2011-06-27
[redacted]	New Brunswick, New Jersey, United States	2011-06-27
[redacted]	Ellicott City, Maryland, United States	2011-06-27
[redacted]	New London, North Carolina, United States	2011-06-27
[redacted]	chicago, Illinois, United States	2011-06-27
[redacted]	Woodbridge, New Jersey, United States	2011-06-27
[redacted]	wantagh, New York, United States	2011-06-27
[redacted]	Arnold, Missouri, United States	2011-06-27
[redacted]	Setúbal, Portugal	2011-06-27
[redacted]	san jose, California, United States	2011-06-27
[redacted]	Butler, New Jersey, United States	2011-06-27
[redacted]	Charlottesville, Virginia, United States	2011-06-27
[redacted]	denver, Colorado, United States	2011-06-27
[redacted]	Lemoore, California, United States	2011-06-27
[redacted]	Pottsville, Pennsylvania, United States	2011-06-27
[redacted]	shelbyville, Tennessee, United States	2011-06-27
[redacted]	Torres Novas, Portugal	2011-06-27
[redacted]	Chicago, Illinois, United States	2011-06-27
[redacted]	Oshkosh, Wisconsin, United States	2011-06-27
[redacted]	San Francisco, California, United States	2011-06-27
[redacted]	St Louis, Missouri, United States	2011-06-27
[redacted]	Hastings, New Zealand	2011-06-27

Name	Location	Date
[redacted]	Boca Raton, Florida, United States	2011-06-27
	Los Angeles, California, United States	2011-06-27
	Washington, Pennsylvania, United States	2011-06-27
	Dayboro, Australia	2011-06-27
	winchester, Massachusetts, United States	2011-06-27
	perth, Washington, United States	2011-06-27
	Merthyr Tydfil, Mid Glamorgan, United Kingdom	2011-06-27
	janesville, Wisconsin, United States	2011-06-27
	Miami, Florida, United States	2011-06-27
	thunder bay, Canada	2011-06-27
	Paramus, New Jersey, United States	2011-06-27
	Hallandale beach, Florida, United States	2011-06-27
	Skillman, New Jersey, United States	2011-06-27
	portland, Oregon, United States	2011-06-27
	San Pedro, California, United States	2011-06-27
	Lantier, Canada	2011-06-27
	Mexico City, Mexico	2011-06-27
	escondido, California, United States	2011-06-27
	Bethesda, Maryland, United States	2011-06-27
	Winter Park, Florida, United States	2011-06-27
	Brooklyn, New York, United States	2011-06-27
	Tujunga, California, United States	2011-06-27
	Minneapolis, Minnesota, United States	2011-06-27
	Brookline, Massachusetts, United States	2011-06-27
	Morrice, Michigan, United States	2011-06-27
	Union, Kentucky, United States	2011-06-27
	Ontario, California, United States	2011-06-27
	Winnipeg, MB., Canada	2011-06-27
	Los Angeles, California, United States	2011-06-27

Name	Location	Date
[redacted]	TORINO, Italy	2011-06-27
	Jersey City, New Jersey, United States	2011-06-28
	Winzer, Germany	2011-06-28
	Fort Collins, Colorado, United States	2011-06-28
	Arkhangelsk, Russian Federation	2011-06-28
	Randwick, Australia	2011-06-28
	New Zealand, New Zealand	2011-06-28
	castel san pietro terme, Italy	2011-06-28
	Bryn Mawr, Pennsylvania, United States	2011-06-28
	Lakeside, California, United States	2011-06-28
	Neuwied, Germany	2011-06-28
	Ridderkerk, Netherlands	2011-06-28
	Quincy, Illinois, United States	2011-06-28
	Amsterdam, Netherlands	2011-06-28
	Vancouver, Canada	2011-06-28
	Purcellville, Virginia, United States	2011-06-28
	rhodos, Greece	2011-06-28
	East Hampton, New York, United States	2011-06-28
	Kuching, Malaysia	2011-06-28
	New Providence, New Jersey, United States	2011-06-28
	Celje, Slovenia	2011-06-28
	Parma, Ohio, United States	2011-06-28
	Cocoa Beach, Florida, United States	2011-06-28
	Diamondhead, Mississippi, United States	2011-06-28
	Diamondhead, Mississippi, United States	2011-06-28
	Genève, New York, United States	2011-06-28
	Jersey City, New Jersey, United States	2011-06-28
	New Oxford, Pennsylvania, United States	2011-06-28
	Syktyvkar, Russian Federation	2011-06-28

Name		Location	Date
[redacted]		red deer, Canada	2011-06-28
		destin, Florida, United States	2011-06-28
		Manchester, United Kingdom	2011-06-28
		New Brunswick, New Jersey, United States	2011-06-28
		Mercer Island, Washington, United States	2011-06-28
		San Jose, California, United States	2011-06-28
		Gresham, Oregon, United States	2011-06-28
		Sherman Oaks, California, United States	2011-06-28
		Santiago, Chile	2011-06-28
		MEXICO, Mexico	2011-06-28
		New york, New York, United States	2011-06-28
		Reno, Nevada, United States	2011-06-28
		Hazel Green, Alabama, United States	2011-06-28
		Foster City, California, United States	2011-06-28
		Poznan, Poland	2011-06-28
		Loughborough, United Kingdom	2011-06-28
		Taunton, United Kingdom	2011-06-28
		mendoza, Argentina	2011-06-28
		Lismore, Australia	2011-06-28
		Corning, New York, United States	2011-06-28
		Wilmington, Delaware, United States	2011-06-28
		Stony Brook, New York, United States	2011-06-28
		Roswell, Georgia, United States	2011-06-28
		Silver Spring, Maryland, United States	2011-06-28
		Mad Hts., Michigan, United States	2011-06-28
		Aalborg, Denmark	2011-06-29
		Grebenhain, Germany	2011-06-29
		Montgomery, Illinois, United States	2011-06-29
		South Amboy, New Jersey, United States	2011-06-29

Name	Location	Date
[redacted]	Maplewood, Minnesota, United States	2011-06-29
	chicago, Illinois, United States	2011-06-29
	DALLAS, Texas, United States	2011-06-29
	El Santiscal, Arcos de la Frontera, Spain	2011-06-29
	mtlaurel, New Jersey, United States	2011-06-29
	Centreville, Maryland, United States	2011-06-29
	la mesa, California, United States	2011-06-29
	Faro, Portugal	2011-06-29
	Lords Valley, Pennsylvania, United States	2011-06-29
	Gorham, Maine, United States	2011-06-29
	Seattle, Washington, United States	2011-06-29
	Hillsborough, North Carolina, United States	2011-06-29
	Birmingham, Michigan, United States	2011-06-29
	Marion, Illinois, United States	2011-06-29
	Portland, Oregon, United States	2011-06-29
	Los Angeles, California, United States	2011-06-29
	El PSO, Texas, United States	2011-06-29
	San Diego, California, United States	2011-06-29
	Brighton, Massachusetts, United States	2011-06-30
	Miami, Florida, United States	2011-06-30
	Deerfield Beach, Florida, United States	2011-06-30
	Brighouse, United Kingdom	2011-06-30
	Thess, Greece	2011-06-30
	Deerfield Beach, Florida, United States	2011-06-30
	Laurence Harbor, New Jersey, United States	2011-06-30
	tel aviv, Israel	2011-06-30
	Dresden, Germany	2011-06-30
	Old Bridge, New Jersey, United States	2011-06-30
	torre annunziata(na), Iowa, United States	2011-06-30

Name	Location	Date
[redacted]	Pinellas Park, Florida, United States	2011-06-30
[redacted]	Denver, Colorado, United States	2011-06-30
[redacted]	juarez, Mexico	2011-06-30
[redacted]	San Rafael, California, United States	2011-06-30
[redacted]	San Rafael, California, United States	2011-06-30
[redacted]	prescott valley, Arizona, United States	2011-06-30
[redacted]	Rancho Cucamonga, California, United States	2011-06-30
[redacted]	Denison, Texas, United States	2011-06-30
[redacted]	Erie, Pennsylvania, United States	2011-06-30
[redacted]	Distrito Federal, Mexico	2011-06-30
[redacted]	Porto, Portugal	2011-07-01
[redacted]	Dhaka, Bangladesh	2011-07-01
[redacted]	new york, New York, United States	2011-07-01
[redacted]	Dana Point, California, United States	2011-07-01
[redacted]	Jackson, New Jersey, United States	2011-07-01
[redacted]	Bogotá, Colombia	2011-07-01
[redacted]	Frankston Heights, Australia	2011-07-02
[redacted]	Lahaska, Pennsylvania, United States	2011-07-02
[redacted]	Philadelphia, Pennsylvania, United States	2011-07-02
[redacted]	KL, Malaysia	2011-07-03
[redacted]	Miami, Florida, United States	2011-07-03
[redacted]	Tucson, Arizona, United States	2011-07-03
[redacted]	Clackamas, Oregon, United States	2011-07-03
[redacted]	Mexico, Mexico	2011-07-03
[redacted]	Whitehorse, Canada	2011-07-03
[redacted]	Seixal, Portugal	2011-07-04
[redacted]	Somerset, New Jersey, United States	2011-07-04
[redacted]	Sandpoint, Idaho, United States	2011-07-04
[redacted]	Neptune, New Jersey, United States	2011-07-04

Name	Location	Date
[redacted]	Bogota, Colombia	2011-07-04
	marano sul panaro, Italy	2011-07-05
	Adelaide, Australia	2011-07-05
	Jeannette, Pennsylvania, United States	2011-07-05
	Alicante, Spain	2011-07-05
	Point Pleasant, New Jersey, United States	2011-07-05
	Wellington, Florida, United States	2011-07-05
	Greenbelt, Maryland, United States	2011-07-05
	San Jose, California, United States	2011-07-06
	telluride, Colorado, United States	2011-07-06
	Iowa City, Iowa, United States	2011-07-06
	Mount Joy, Pennsylvania, United States	2011-07-07
	VALREAS, France	2011-07-08
	Kingston, New York, United States	2011-07-08
	East Hanover, New Jersey, United States	2011-07-08
	Edmonton, Canada	2011-07-08
	New York, New York, United States	2011-07-09
	jacksonville, Florida, United States	2011-07-09
	Hof, Germany	2011-07-10
	Lexington, Kentucky, United States	2011-07-11
	rego park, New York, United States	2011-07-11
	Gdynia, Poland	2011-07-12
	San Diego, California, United States	2011-07-12
	Scituate, Massachusetts, United States	2011-07-12
	Merritt Island, Florida, United States	2011-07-13
	Davenport, Iowa, United States	2011-07-15
	Phoenix, Arizona, United States	2011-07-15
	Inlet, New York, United States	2011-07-15
	Tucson, Arizona, United States	2011-07-16
	vancouver, Canada	2011-07-16

Name	Location	Date
[redacted]	Tucson, Arizona, United States	2011-07-17
	Glen Carbon, Illinois, United States	2011-07-23
	Philadelphia, Pennsylvania, United States	2011-07-25
	shelbyville, Tennessee, United States	2011-07-25
	Paris, France	2011-07-27
	Trenton, Canada	2011-07-27
	verona, Italy	2011-07-28
	Whitsett, North Carolina, United States	2011-07-28
	clarkdale, Arizona, United States	2011-07-29
	Vilanova del Camí, Spain	2011-07-31
	Medicina, Bologna, Italy	2011-07-31
	Old bridge, New Jersey, United States	2011-08-01
	Highland Park, New Jersey, United States	2011-08-03
	Highland Park, New Jersey, United States	2011-08-04
	Portland, Oregon, United States	2011-08-04
	browns mills, New Jersey, United States	2011-08-07
	south amboy, New Jersey, United States	2011-08-07
	Columbus, Ohio, United States	2011-08-08
	Hazel Park, Michigan, United States	2011-08-09
	Medford, Massachusetts, United States	2011-08-10
	Metuchen, New Jersey, United States	2011-08-10
	Wadsworth, Ohio, United States	2011-08-11
	Rye, New York, United States	2011-08-11
	Tecumseh, Missouri, United States	2011-08-11
	camden, New Jersey, United States	2011-08-11
	Eugene, Oregon, United States	2011-08-11
	Cincinnati, Ohio, United States	2011-08-11
	Radium Springs, New Mexico, United States	2011-08-11
	Holton, Indiana, United States	2011-08-11

Name	Location	Date
[redacted]	CHARLESTON, West Virginia, United States	2011-08-11
	Columbus, Indiana, United States	2011-08-12
	Gloucester City, New Jersey, United States	2011-08-12
	Billerica, Massachusetts, United States	2011-08-12
	Lindenhurst, Illinois, United States	2011-08-12
	Feeding Hills, Massachusetts, United States	2011-08-12
	Bedminster, New Jersey, United States	2011-08-13
	Columbia, Maryland, United States	2011-08-13
	Norristown, Pennsylvania, United States	2011-08-13
	Ellicott City, Maryland, United States	2011-08-13
	Lexington, South Carolina, United States	2011-08-13
	Brandon, South Dakota, United States	2011-08-13
	Aveiro, Portugal	2011-08-14
	Oldsmar, Florida, United States	2011-08-14
	Wayne, New Jersey, United States	2011-08-14
	Old Hickory, Tennessee, United States	2011-08-17
	Teaneck, New Jersey, United States	2011-08-18
	Edison, New Jersey, United States	2011-08-18
	Morrice, Michigan, United States	2011-08-19
	Roseburg, Oregon, United States	2011-08-20
	langhorne, Pennsylvania, United States	2011-08-24
	Ringwood, New Jersey, United States	2011-08-24
	holiday, Florida, United States	2011-08-25
	East Brunswick, New Jersey, United States	2011-08-26
	Raritan, New Jersey, United States	2011-08-26
	Webster, Kentucky, United States	2011-08-26
	hobart, Indiana, United States	2011-08-26
	New Brunswick, New Jersey, United States	2011-08-26

Name	Location	Date
[redacted]	United States	2011-08-26
	Athens, Georgia, United States	2011-08-26
	Saline, Michigan, United States	2011-08-26
	palmdale, California, United States	2011-08-26
	Decatur, Texas, United States	2011-08-26
	Auburn, New York, United States	2011-08-26
	Long Branch, New Jersey, United States	2011-08-26
	Agawam, Massachusetts, United States	2011-08-26
	Morristown, Tennessee, United States	2011-08-26
	Webster, New York, United States	2011-08-26
	Woodland Park, New Jersey, United States	2011-08-26
	Los Angeles, California, United States	2011-08-26
	PEORIA, Arizona, United States	2011-08-26
	port colborne, California, United States	2011-08-26
	Staten Island, New York, United States	2011-08-27
	Branchburg, New Jersey, United States	2011-08-27
	Willoughby, Ohio, United States	2011-08-27
	Singapore, Singapore	2011-08-27
	Edison, New Jersey, United States	2011-08-27
	Thessaloniki, Greece	2011-08-27
	Edison, New Jersey, United States	2011-08-27
	williamsburg, Virginia, United States	2011-08-27
	Linden, New Jersey, United States	2011-08-27
	parish, New York, United States	2011-08-27
	Mahwah, New Jersey, United States	2011-08-27
	Middle River, Maryland, United States	2011-08-27
	Covina, California, United States	2011-08-27
	Flanders, New Jersey, United States	2011-08-27
	Hillsborough, New Jersey, United States	2011-08-27

Name	Location	Date
[redacted]	Atlantic Beach, Florida, United States	2011-08-27
[redacted]	Clermont, Florida, United States	2011-08-27
[redacted]	edison, New Jersey, United States	2011-08-27
[redacted]	Ridgewood, New York, United States	2011-08-27
[redacted]	Bound Brook, New Jersey, United States	2011-08-27
[redacted]	Phx, Arizona, United States	2011-08-27
[redacted]	Bound Brook, New Jersey, United States	2011-08-27
[redacted]	Bound Brook, New Jersey, United States	2011-08-27
[redacted]	Kittery Point, Maine, United States	2011-08-27
[redacted]	Cranston, Rhode Island, United States	2011-08-27
[redacted]	Washington, District Of Columbia, United States	2011-08-27
[redacted]	Fayetteville, North Carolina, United States	2011-08-27
[redacted]	Dallas, Texas, United States	2011-08-27
[redacted]	Chicago, Illinois, United States	2011-08-27
[redacted]	Martinsville, Indiana, United States	2011-08-27
[redacted]	Biloxi, Mississippi, United States	2011-08-27
[redacted]	Clearwater, Florida, United States	2011-08-27
[redacted]	ringwood, New Jersey, United States	2011-08-27
[redacted]	frenchtown, New Jersey, United States	2011-08-27
[redacted]	Pittsburgh, Pennsylvania, United States	2011-08-27
[redacted]	Land O Lakes, Florida, United States	2011-08-27
[redacted]	Seattle, Washington, United States	2011-08-27
[redacted]	apple valley, California, United States	2011-08-27
[redacted]	somerville, New Jersey, United States	2011-08-28
[redacted]	Mosinee, Wisconsin, United States	2011-08-28
[redacted]	SACRAMENTO, California, United States	2011-08-28
[redacted]	Middletown, Maryland, United States	2011-08-28
[redacted]	lincohn park, New Jersey, United States	2011-08-28
[redacted]	Seattle, Washington, United States	2011-08-28

Name			Location	Date
[redacted]			Metuchen, New Jersey, United States	2011-08-28
			Casével, Portugal	2011-08-28
			Strathmore, Canada	2011-08-28
			Glen Gardner, New Jersey, United States	2011-08-28
			Edison, New Jersey, United States	2011-08-28
			Davers, Massachusetts, United States	2011-08-28
			East Orange, New Jersey, United States	2011-08-28
			Leander, Texas, United States	2011-08-28
			Arlington, Texas, United States	2011-08-28
			United States	2011-08-28
			Hope, Idaho, United States	2011-08-28
			Chicopee, Massachusetts, United States	2011-08-28
			morgantown, West Virginia, United States	2011-08-28
			Chicago, Illinois, United States	2011-08-28
			baltimore, Maryland, United States	2011-08-28
			Fort Lee, New Jersey, United States	2011-08-28
			Somerset, New Jersey, United States	2011-08-29
			bridgewater, New Jersey, United States	2011-08-29
			highland park, New Jersey, United States	2011-08-29
			Bridgewater, New Jersey, United States	2011-08-29
			South Bound Brook, New Jersey, United States	2011-08-29
			LAS VEGAS, Nevada, United States	2011-08-29
			somewhere, New Jersey, United States	2011-08-29
			LAS VEGAS, Nevada, United States	2011-08-29
			Atlantic Beach, Florida, United States	2011-08-29
			United States	2011-08-29
			Berkeley, California, United States	2011-08-29
			frankyn, Wisconsin, United States	2011-08-29
			iselin, New Jersey, United States	2011-08-29

Name	Location	Date
[redacted]	Silver Spring, Maryland, United States	2011-08-29
[redacted]	port of spain, Trinidad and Tobago	2011-08-29
[redacted]	LOWELL, Massachusetts, United States	2011-08-29
[redacted]	Los Angeles, California, United States	2011-08-29
[redacted]	London, Canada	2011-08-29
[redacted]	a, Texas, United States	2011-08-29
[redacted]	galloway, New Jersey, United States	2011-08-29
[redacted]	Tucson, Arizona, United States	2011-08-29
[redacted]	Los Angeles, California, United States	2011-08-30
[redacted]	Rochester, New York, United States	2011-08-30
[redacted]	Seattle, Washington, United States	2011-08-30
[redacted]	Gainesville, Florida, United States	2011-08-30
[redacted]	Columbus, Ohio, United States	2011-08-30
[redacted]	London, United Kingdom	2011-08-30
[redacted]	Raleigh, North Carolina, United States	2011-08-30
[redacted]	Raleigh, North Carolina, United States	2011-08-30
[redacted]	clarksville, Tennessee, United States	2011-08-30
[redacted]	West Lafayette, Indiana, United States	2011-08-30
[redacted]	glen haven, Colorado, United States	2011-08-30
[redacted]	prescott, Arizona, United States	2011-08-30
[redacted]	Laramie, Wyoming, United States	2011-08-30
[redacted]	Cincinnati, Ohio, United States	2011-08-30
[redacted]	Milwaukee, Wisconsin, United States	2011-08-30
[redacted]	Santa Fe, New Mexico, United States	2011-08-30
[redacted]	San Francisco, California, United States	2011-08-30
[redacted]	valley stream, New York, United States	2011-08-30
[redacted]	Woodbury, Minnesota, United States	2011-08-30
[redacted]	Pt. Arena, California, United States	2011-08-30
[redacted]	hurst, Texas, United States	2011-08-30
[redacted]	Glendale, Arizona, United States	2011-08-30

Name	Location	Date
[redacted]	Columbus, Ohio, United States	2011-08-30
[redacted]	Dilworth, Minnesota, United States	2011-08-30
[redacted]	Jacksonville, Florida, United States	2011-08-30
[redacted]	Winter Park, Florida, United States	2011-08-30
[redacted]	east rochester, New York, United States	2011-08-30
[redacted]	Brooklyn, New York, United States	2011-08-30
[redacted]	Winfield, Illinois, United States	2011-08-30
[redacted]	new york, New York, United States	2011-08-30
[redacted]	Suffern, New York, United States	2011-08-30
[redacted]	METUCHEN, New Jersey, United States	2011-08-30
[redacted]	Eureka, California, United States	2011-08-30
[redacted]	Blomsterdalen, Norway	2011-08-31
[redacted]	Compton, California, United States	2011-08-31
[redacted]	Maysville, Kentucky, United States	2011-08-31
[redacted]	Delhi, India	2011-08-31
[redacted]	Trenton, Tennessee, United States	2011-08-31
[redacted]	Petersburg, Virginia, United States	2011-08-31
[redacted]	Louisville, Kentucky, United States	2011-08-31
[redacted]	hoffman estates, Illinois, United States	2011-08-31
[redacted]	Wichita Falls, Texas, United States	2011-08-31
[redacted]	Indianapolis, Indiana, United States	2011-08-31
[redacted]	Monroe, Michigan, United States	2011-08-31
[redacted]	Southlake, Texas, United States	2011-08-31
[redacted]	manteca, California, United States	2011-08-31
[redacted]	Southington, Ohio, United States	2011-08-31
[redacted]	Etobicoke, Canada	2011-08-31
[redacted]	Midland, Texas, United States	2011-08-31
[redacted]	Los Angeles, California, United States	2011-08-31
[redacted]	Elmwood Park, New Jersey, United States	2011-08-31

Name	Location	Date
[redacted]	Colorado Springs, Colorado, United States	2011-08-31
[redacted]	Little Rock, Arkansas, United States	2011-08-31
[redacted]	Phoenix, Arizona, United States	2011-08-31
[redacted]	New City, New York, United States	2011-08-31
[redacted]	Tampa, Florida, United States	2011-08-31
[redacted]	eaton, Ohio, United States	2011-08-31
[redacted]	Colorado Springs, Colorado, United States	2011-08-31
[redacted]	portland, Connecticut, United States	2011-08-31
[redacted]	Rock Hill, South Carolina, United States	2011-08-31
[redacted]	toronto, California, United States	2011-08-31
[redacted]	zanesville, Ohio, United States	2011-08-31
[redacted]	North Wales, Pennsylvania, United States	2011-09-01
[redacted]	Hendersonville, North Carolina, United States	2011-09-01
[redacted]	endicott, New York, United States	2011-09-01
[redacted]	New Castle, Delaware, United States	2011-09-01
[redacted]	Katy, Texas, United States	2011-09-01
[redacted]	North Plainfield, New Jersey, United States	2011-09-01
[redacted]	Acton, Massachusetts, United States	2011-09-01
[redacted]	Knox, Indiana, United States	2011-09-01
[redacted]	Rigewood, New York, United States	2011-09-01
[redacted]	Lexington, Texas, United States	2011-09-01
[redacted]	greenville, South Carolina, United States	2011-09-01
[redacted]	Pacoima, California, United States	2011-09-01
[redacted]	Goodyear, Arizona, United States	2011-09-01
[redacted]	Williamsville, New York, United States	2011-09-01
[redacted]	Los Angeles, California, United States	2011-09-01
[redacted]	Glendale, California, United States	2011-09-01
[redacted]	San Bernardino, California, United States	2011-09-01

Name	Location	Date
[redacted]	Orlando, Florida, United States	2011-09-01
[redacted]	singapore, Singapore	2011-09-01
[redacted]	cotati, California, United States	2011-09-01
[redacted]	Show Low, Arizona, United States	2011-09-01
[redacted]	Oakland, California, United States	2011-09-01
[redacted]	Spencerport, New York, United States	2011-09-01
[redacted]	Henderson, Nevada, United States	2011-09-01
[redacted]	Long Island City, New York, United States	2011-09-01
[redacted]	Helsinki, Finland	2011-09-02
[redacted]	Greenville, Rhode Island, United States	2011-09-02
[redacted]	barneveld, New York, United States	2011-09-02
[redacted]	Raleigh, North Carolina, United States	2011-09-02
[redacted]	Sanford, Florida, United States	2011-09-02
[redacted]	Colton, Oregon, United States	2011-09-02
[redacted]	Sea Bright, New Jersey, United States	2011-09-02
[redacted]	Salida, Colorado, United States	2011-09-02
[redacted]	Metuchen, New Jersey, United States	2011-09-02
[redacted]	DeBary, Florida, United States	2011-09-02
[redacted]	morristown, New Jersey, United States	2011-09-02
[redacted]	GAVERE, Belgium	2011-09-02
[redacted]	Ellwood City, Pennsylvania, United States	2011-09-02
[redacted]	New Orleans, Louisiana, United States	2011-09-02
[redacted]	Mechanicsburg, Pennsylvania, United States	2011-09-02
[redacted]	devore, California, United States	2011-09-02
[redacted]	Sanford, Florida, United States	2011-09-02
[redacted]	Chula Vista, California, United States	2011-09-02
[redacted]	Leawood, Kansas, United States	2011-09-02
[redacted]	Pleasant Hill, California, United States	2011-09-02
[redacted]	Rangeley, Maine, United States	2011-09-02

Name	Location	Date
[redacted]	Memphis, Tennessee, United States	2011-09-02
	Bend, Oregon, United States	2011-09-02
	Belle Glade, Florida, United States	2011-09-02
	La Jolla, California, United States	2011-09-02
	Glencoe, Illinois, United States	2011-09-02
	Santa Cruz, California, United States	2011-09-02
	Glen Burnie, Maryland, United States	2011-09-02
	pacific palisades, California, United States	2011-09-02
	Nottingham, United Kingdom	2011-09-03
	Compton, California, United States	2011-09-03
	Tucson, Arizona, United States	2011-09-03
	portland, Oregon, United States	2011-09-03
	Farwell, Michigan, United States	2011-09-03
	Pasig City, Philippines	2011-09-03
	Isabela, Puerto Rico, United States	2011-09-03
	Hospitalet del Llobregat, Northern Mariana Islands, United States	2011-09-03
	Hazel Park, Michigan, United States	2011-09-03
	Delaware, United States Minor Outlying Islands	2011-09-03
	Denver, Colorado, United States	2011-09-03
	Dover, Delaware, United States	2011-09-03
	St. Louis, Missouri, United States	2011-09-03
	Desert Hot Springs, California, United States	2011-09-03
	Toronto, Canada	2011-09-03
	NY, New York, United States	2011-09-03
	philadelphia, Pennsylvania, United States	2011-09-03
	jacksonville nc, North Carolina, United States	2011-09-03
	Schiller Park, Illinois, United States	2011-09-03

Name	Location	Date
[redacted]	jackson, Georgia, United States	2011-09-03
	Colorado Springs, Colorado, United States	2011-09-03
	Boone, North Carolina, United States	2011-09-03
	Bellingham, Massachusetts, United States	2011-09-03
	bulverde, Texas, United States	2011-09-03
	Tavares, Florida, United States	2011-09-03
	La Crescenta, California, United States	2011-09-04
	Mumbai, India	2011-09-04
	Miami, Switzerland	2011-09-04
	Hawthorne, California, United States	2011-09-04
	Monticello, Iowa, United States	2011-09-04
	bahar ic caghaq, Malta	2011-09-04
	Albuquerque, New Mexico, United States	2011-09-04
	Eaton, Ohio, United States	2011-09-04
	belfast northen ireland, United Kingdom	2011-09-04
	Santa Cruz, California, United States	2011-09-04
	Mississauga, Canada	2011-09-04
	houston, Texas, United States	2011-09-04
	Alexandria, Virginia, United States	2011-09-04
	St. Louis, Missouri, United States	2011-09-04
	Brookshire, Texas, United States	2011-09-04
	Woodcliff Lake, New Jersey, United States	2011-09-04
	Chicago, Illinois, United States	2011-09-04
	Winthrop, New York, United States	2011-09-04
	29 Palms, California, United States	2011-09-04
	Sittard, Netherlands	2011-09-04
	ewing, New Jersey, United States	2011-09-04
	Phoenix, Arizona, United States	2011-09-04
	ewing, New Jersey, United States	2011-09-04

Name	Location	Date
[redacted]	palestine, West Virginia, United States	2011-09-04
	Poughkeepsie, New York, United States	2011-09-04
	slidell, Louisiana, United States	2011-09-04
	torrington, Connecticut, United States	2011-09-04
	SEATTLE, Washington, United States	2011-09-04
	Richmond, Virginia, United States	2011-09-05
	Manchester, New Hampshire, United States	2011-09-05
	Manville, New Jersey, United States	2011-09-05
	Brunn am Gebirge, Austria	2011-09-05
	Woodbridge, New Jersey, United States	2011-09-05
	Bloomsbury, New Jersey, United States	2011-09-05
	Bound Brook, New Jersey, United States	2011-09-05
	Ibiza-Spain, Spain	2011-09-05
	BOUND BROOK, New Jersey, United States	2011-09-05
	edison, New Jersey, United States	2011-09-05
	Bridgewater, New Jersey, United States	2011-09-05
	East Brunswick, New Jersey, United States	2011-09-05
	Dunellen, New Jersey, United States	2011-09-05
	Somerset, New Jersey, United States	2011-09-05
	middlesex, New Jersey, United States	2011-09-05
	somerset, New Jersey, United States	2011-09-05
	Hillsborough, New Jersey, United States	2011-09-05
	Minneapolis, Minnesota, United States	2011-09-05
	Bound Brook, New Jersey, United States	2011-09-05
	Bridgewater, New Jersey, United States	2011-09-05
	Somerset, New Jersey, United States	2011-09-05
	Montclair, New Jersey, United States	2011-09-05
	Ossining, New York, United States	2011-09-05
	Santos, Brazil	2011-09-05

Name		Location	Date
[redacted]		Hillsborough, New Jersey, United States	2011-09-05
		Lemont, Illinois, United States	2011-09-05
		Hawley, Pennsylvania, United States	2011-09-05
		valencia, Spain	2011-09-05
		Monmouth Jct, New Jersey, United States	2011-09-05
		Monmouth Junction, New Jersey, United States	2011-09-05
		Richfield, Minnesota, United States	2011-09-05
		Somewhere, Nebraska, United States	2011-09-05
		Toms River, New Jersey, United States	2011-09-05
		Middlesex, New Jersey, United States	2011-09-05
		Dunellen, New Jersey, United States	2011-09-05
		Frankfurt, Germany	2011-09-05
		Union, New Jersey, United States	2011-09-05
		Purcell, Oklahoma, United States	2011-09-05
		highland park, New Jersey, United States	2011-09-05
		Orange, California, United States	2011-09-05
		Portland, Oregon, United States	2011-09-05
		Allentown, Pennsylvania, United States	2011-09-05
		Hacienda Heights, California, United States	2011-09-05
		Braga, Indiana, United States	2011-09-06
		Cenusco sul naviglio, Italy	2011-09-06
		melksham, New York, United States	2011-09-06
		Lisbon, Portugal	2011-09-06
		North Hollywood, California, United States	2011-09-06
		bound brook, New Jersey, United States	2011-09-06
		Brijdorpe, Netherlands	2011-09-06
		Old Bridge, New Jersey, United States	2011-09-06
		Hoboken, New Jersey, United States	2011-09-06

Name	Location	Date
[redacted]	cranbury, New Jersey, United States	2011-09-06
[redacted]	Orange City, Florida, United States	2011-09-06
[redacted]	manville, New Jersey, United States	2011-09-06
[redacted]	Hillsborough, New Jersey, United States	2011-09-06
[redacted]	Bound Brook, New Jersey, United States	2011-09-06
[redacted]	Warren, New Jersey, United States	2011-09-06
[redacted]	Cary, North Carolina, United States	2011-09-06
[redacted]	Bridgewater, New Jersey, United States	2011-09-06
[redacted]	new york city, New York, United States	2011-09-06
[redacted]	Hillsborough, New Jersey, United States	2011-09-06
[redacted]	Avellaneda, Argentina	2011-09-06
[redacted]	Portland, Oregon, United States	2011-09-06
[redacted]	Manville, New Jersey, United States	2011-09-06
[redacted]	Concord, California, United States	2011-09-06
[redacted]	Yuma, Arizona, United States	2011-09-06
[redacted]	Somerset, New Jersey, United States	2011-09-06
[redacted]	Somerset, New Hampshire, United States	2011-09-06
[redacted]	St. Louis, Missouri, United States	2011-09-06
[redacted]	Hopkins, Minnesota, United States	2011-09-06
[redacted]	Warren, New Jersey, United States	2011-09-06
[redacted]	calgary, Canada	2011-09-06
[redacted]	Warren, New Jersey, United States	2011-09-06
[redacted]	Iselin, New Jersey, United States	2011-09-06
[redacted]	carlsbad, California, United States	2011-09-06
[redacted]	Ichiharashi, Japan	2011-09-06
[redacted]	Emmaus, Pennsylvania, United States	2011-09-06
[redacted]	Aledo, Texas, United States	2011-09-06
[redacted]	Istanbul, Turkey	2011-09-07
[redacted]	chiba, Japan	2011-09-07
[redacted]	igualada, Spain	2011-09-07

Name	Location	Date
[redacted]	Chiba, Japan	2011-09-07
	camden, New Jersey, United States	2011-09-07
	Hamilton, New Jersey, United States	2011-09-07
	Belo Horizonte, Brazil	2011-09-07
	Cuyahoga Falls, Ohio, United States	2011-09-07
	Decatur, Illinois, United States	2011-09-07
	Sarasota, Florida, United States	2011-09-07
	PEORIA, Illinois, United States	2011-09-07
	Palo Alto, Netherlands	2011-09-07
	Karlsruhe, Germany	2011-09-07
	Bäretswil, Iowa, United States	2011-09-07
	cork, Ireland	2011-09-07
	Granger, Indiana, United States	2011-09-07
	Torino, Italy	2011-09-07
	Nooo, California, United States	2011-09-07
	Summit, New Jersey, United States	2011-09-07
	STAFFORD, Virginia, United States	2011-09-07
	Steuben, Maine, United States	2011-09-07
	BRAMPTON, Canada	2011-09-07
	Sherwood, Arkansas, United States	2011-09-07
	Long Beach, California, United States	2011-09-07
	George West, Texas, United States	2011-09-08
	Adelaide, Australia	2011-09-08
	Pelham, New Hampshire, United States	2011-09-08
	Boone, North Carolina, United States	2011-09-08
	BRONX, New York, United States	2011-09-08
	Maineville, Ohio, United States	2011-09-08
	Capitan, New Mexico, United States	2011-09-08
	Phoenix, Arizona, United States	2011-09-08
	chicago, Illinois, United States	2011-09-08

Name	Location	Date
[redacted]	Valley Springs, California, United States	2011-09-08
	Parma Heights, Ohio, United States	2011-09-08
	McGregor, Minnesota, United States	2011-09-08
	Georgetown University, District Of Columbia, United States	2011-09-08
	Palatine,, Illinois, United States	2011-09-08
	waterford, Ireland	2011-09-08
	mt horeb, Wisconsin, United States	2011-09-08
	Crestwood, Illinois, United States	2011-09-08
	the woodlands, Texas, United States	2011-09-08
	Bradford, Pennsylvania, United States	2011-09-08
	Farmington Hills, Michigan, United States	2011-09-08
	Suffern, New York, United States	2011-09-08
	San Francisco, California, United States	2011-09-09
	austin, Texas, United States	2011-09-09
	bound brook, New Jersey, United States	2011-09-09
	Weehawken, New Jersey, United States	2011-09-09
	Millers, Maryland, United States	2011-09-09
	Columbus, Ohio, United States	2011-09-09
	Merrillville, Indiana, United States	2011-09-09
	Gillette, New Jersey, United States	2011-09-09
	Basel, Switzerland	2011-09-09
	123, Alabama, United States	2011-09-09
	Kent, Connecticut, United States	2011-09-09
	Pleasant Lake, Michigan, United States	2011-09-09
	Olympia, Washington, United States	2011-09-09
	Denver, Colorado, United States	2011-09-09
	Denver, Colorado, United States	2011-09-09
	Lexington, Kentucky, United States	2011-09-09
	Grand Junction, Michigan, United States	2011-09-09

Name	Location	Date
[redacted]	Berkeley, California, United States	2011-09-09
	Montpelier, Vermont, United States	2011-09-10
	st louis, Missouri, United States	2011-09-10
	Los Angeles, California, United States	2011-09-10
	Denver, Colorado, United States	2011-09-10
	Edison, New Jersey, United States	2011-09-10
	silver spring, Maryland, United States	2011-09-10
	Abbeville, Georgia, United States	2011-09-10
	union city, California, United States	2011-09-10
	piscataway, New Jersey, United States	2011-09-10
	St. Paul, Minnesota, United States	2011-09-10
	Redmond, Oregon, United States	2011-09-10
	Hillsbourough, New Jersey, United States	2011-09-10
	ft myers, Florida, United States	2011-09-10
	South Pasadena, California, United States	2011-09-10
	Anaheim, California, United States	2011-09-10
	Visalia, California, United States	2011-09-10
	Houston, Texas, United States	2011-09-11
	Manville, New Jersey, United States	2011-09-11
	Columbus, Ohio, United States	2011-09-11
	nashville, Tennessee, United States	2011-09-11
	West Chicago, Illinois, United States	2011-09-11
	Peoria, Arizona, United States	2011-09-11
	Long Branch, New Jersey, United States	2011-09-11
	Beacon Falls, Connecticut, United States	2011-09-11
	Mankto, Minnesota, United States	2011-09-11
	Lawrence, Kansas, United States	2011-09-11
	Santa Cruz, California, United States	2011-09-11
	Louisville, Kentucky, United States	2011-09-11
	Milwaukee, Wisconsin, United States	2011-09-11

Name	Location	Date
[redacted]	portland, Oregon, United States	2011-09-11
	Charleston, South Carolina, United States	2011-09-11
	Pensacola, Florida, United States	2011-09-11
	Riverside, Rhode Island, United States	2011-09-11
	Bronx, New York, New York, United States	2011-09-11
	NMB, South Carolina, United States	2011-09-11
	Fountain Hill, Pennsylvania, United States	2011-09-11
	Bristol, Virginia, United States	2011-09-11
	Goleta, California, United States	2011-09-11
	Omaha, Nebraska, United States	2011-09-11
	El Paso, Texas, United States	2011-09-11
	Seattle, Washington, United States	2011-09-11
	hayward, California, United States	2011-09-11
	Nicosia, Cyprus	2011-09-11
	East Lansing, Michigan, United States	2011-09-11
	new york, New York, United States	2011-09-11
	Kissimmee, Florida, United States	2011-09-11
	Glenside, Pennsylvania, United States	2011-09-11
	holliday, Texas, United States	2011-09-11
	San Francisco, California, United States	2011-09-11
	Markham, Canada	2011-09-11
	North Armagh, Ireland	2011-09-11
	Hempstead, New York, United States	2011-09-11
	Brooklyn, New York, United States	2011-09-11
	Martins Ferry, Ohio, United States	2011-09-11
	san marcos, Texas, United States	2011-09-12
	Oklahoma City, Oklahoma, United States	2011-09-12
	Menlo Park, California, United States	2011-09-12
	Washington, District Of Columbia, United States	2011-09-12

Name	Location	Date
[redacted]	Swansea, Massachusetts, United States	2011-09-12
[redacted]	los Angeles, United States Minor Outlying Islands	2011-09-12
[redacted]	firestone, Colorado, United States	2011-09-12
[redacted]	Willard, Ohio, United States	2011-09-12
[redacted]	warminster, Pennsylvania, United States	2011-09-12
[redacted]	bridgewater, New Jersey, United States	2011-09-12
[redacted]	Caguas, Puerto Rico, United States	2011-09-12
[redacted]	Noblesville, Indiana, United States	2011-09-12
[redacted]	Riverview, Florida, United States	2011-09-12
[redacted]	Tampere, Finland	2011-09-12
[redacted]	stratford, New Jersey, United States	2011-09-12
[redacted]	Perkins, Oklahoma, United States	2011-09-12
[redacted]	Indianapolis, Indiana, United States	2011-09-12
[redacted]	Melbourne, Florida, United States	2011-09-12
[redacted]	Croton on Hudson, New York, United States	2011-09-12
[redacted]	albuquerque, New Mexico, United States	2011-09-12
[redacted]	morristown, New Jersey, United States	2011-09-12
[redacted]	lafayette, Louisiana, United States	2011-09-12
[redacted]	San Jose, California, United States	2011-09-12
[redacted]	los angeles, California, United States	2011-09-13
[redacted]	Auburndale, Massachusetts, United States	2011-09-13
[redacted]	Towson, Maryland, United States	2011-09-13
[redacted]	Austin, Texas, United States	2011-09-13
[redacted]	Gilbert, Arizona, United States	2011-09-13
[redacted]	Tyler, Texas, United States	2011-09-13
[redacted]	Phoenix, Arizona, United States	2011-09-13
[redacted]	phila, Pennsylvania, United States	2011-09-13
[redacted]	Cincinnati, Ohio, United States	2011-09-13

Name	Location	Date
[redacted]	fort valley, Virginia, United States	2011-09-13
[redacted]	Louisville, Kentucky, United States	2011-09-13
[redacted]	Cary, North Carolina, United States	2011-09-13
[redacted]	Katy, Texas, United States	2011-09-13
[redacted]	Cottage Grove, Minnesota, United States	2011-09-13
[redacted]	Purvis, Mississippi, United States	2011-09-13
[redacted]	southport, North Carolina, United States	2011-09-13
[redacted]	Lombard, Illinois, United States	2011-09-13
[redacted]	Apache Junction, Arizona, United States	2011-09-14
[redacted]	atlanta, Georgia, United States	2011-09-14
[redacted]	frisco, Texas, United States	2011-09-14
[redacted]	Milano, Italy	2011-09-14
[redacted]	New York, New York, United States	2011-09-14
[redacted]	Winchester, Virginia, United States	2011-09-14
[redacted]	Alpharetta, Georgia, United States	2011-09-14
[redacted]	Riverton, New Jersey, United States	2011-09-15
[redacted]	Austin, Texas, United States	2011-09-15
[redacted]	north brunswick, New Jersey, United States	2011-09-15
[redacted]	Palmerton, Pennsylvania, United States	2011-09-15
[redacted]	UDINE, Alaska, United States	2011-09-15
[redacted]	Brooklyn, New York, United States	2011-09-15
[redacted]	Gaithersburg, Maryland, United States	2011-09-15
[redacted]	Phoenix, Arizona, United States	2011-09-15
[redacted]	Medford, Oregon, United States	2011-09-15
[redacted]	Deer Park, Washington, United States	2011-09-15
[redacted]	Chicago, Illinois, United States	2011-09-16
[redacted]	Perth, Australia	2011-09-16
[redacted]	Poughkeepsie, New York, United States	2011-09-16
[redacted]	st.petersburg, Florida, United States	2011-09-16

Name	Location	Date
[redacted]	Bowling Green, Ohio, United States	2011-09-16
	Phoenix, Arizona, United States	2011-09-16
	Great NEck, New York, United States	2011-09-16
	mahwah, New Jersey, United States	2011-09-16
	warminster, Pennsylvania, United States	2011-09-17
	Orrefors, Sweden	2011-09-17
	East Brunswick, New Jersey, United States	2011-09-17
	Limassol, Cyprus	2011-09-17
	Postville, Iowa, United States	2011-09-17
	Carolina Beach, North Carolina, United States	2011-09-17
	bordeaux FRANCE, France	2011-09-17
	Buffalo, New York, United States	2011-09-17
	EL CERRITO, California, United States	2011-09-17
	San Diego, California, United States	2011-09-17
	redding, California, United States	2011-09-17
	Wigan, United Kingdom	2011-09-17
	hyderabad, India	2011-09-18
	Memmingen, Delaware, United States	2011-09-18
	Enfield, United Kingdom	2011-09-18
	Alexandria, Virginia, United States	2011-09-18
	Los Angeles, California, United States	2011-09-18
	Foresthill, California, United States	2011-09-18
	Portland, Oregon, United States	2011-09-18
	Portland, Oregon, United States	2011-09-18
	Platteville, Wisconsin, United States	2011-09-18
	Berlin, Germany	2011-09-19
	Virginia Beach, Virginia, United States	2011-09-19
	Clearwater, Florida, United States	2011-09-19
	Marshfield, Wisconsin, United States	2011-09-19

Name	Location	Date
[redacted]	Madison, Wisconsin, United States	2011-09-19
	Unionville, Connecticut, United States	2011-09-19
	aiken, South Carolina, United States	2011-09-19
	Christchurch, New Zealand	2011-09-20
	Rugby, United Kingdom	2011-09-20
	Grawn, Michigan, United States	2011-09-20
	CHESTER, Vermont, United States	2011-09-20
	Chesterfield, Missouri, United States	2011-09-20
	Holland, Michigan, United States	2011-09-20
	newport, Maine, United States	2011-09-20
	Johannesburg, South Africa	2011-09-20
	Miami, Florida, United States	2011-09-20
	galt, California, United States	2011-09-20
	Oak Creek, Wisconsin, United States	2011-09-20
	tama, Iowa, United States	2011-09-20
	Hatfield, Pennsylvania, United States	2011-09-21
	schirrhein, Florida, United States	2011-09-21
	Cortland, New York, United States	2011-09-21
	Oklahoma City, Oklahoma, United States	2011-09-21
	Worcester, Massachusetts, United States	2011-09-21
	Miami, Florida, United States	2011-09-21
	Swannanoa, North Carolina, United States	2011-09-21
	south Orange, New Jersey, United States	2011-09-22
	Fairmont, West Virginia, United States	2011-09-22
	washington, District Of Columbia, United States	2011-09-22
	North Branford, Connecticut, United States	2011-09-22
	Houghton Lake, Michigan, United States	2011-09-22
	Nashua, New Hampshire, United States	2011-09-22

Name	Location	Date
[redacted]	denver, Colorado, United States	2011-09-22
[redacted]	Rowland Heights, California, United States	2011-09-22
[redacted]	LAS VEGAS, Nevada, United States	2011-09-22
[redacted]	Bronx, New York, United States	2011-09-22
[redacted]	reno, Nevada, United States	2011-09-22
[redacted]	goleta, California, United States	2011-09-22
[redacted]	Mesa, Arizona, United States	2011-09-22
[redacted]	West Covina, California, United States	2011-09-22
[redacted]	Stayton, Oregon, United States	2011-09-22
[redacted]	Charlotte, North Carolina, United States	2011-09-23
[redacted]	Tomball, Texas, United States	2011-09-23
[redacted]	Richboro, Pennsylvania, United States	2011-09-23
[redacted]	Colorado Springs, Colorado, United States	2011-09-23
[redacted]	citrus springs, Florida, United States	2011-09-23
[redacted]	Lansdowne, Pennsylvania, United States	2011-09-23
[redacted]	Dover, Delaware, United States	2011-09-23
[redacted]	Sacramento, California, United States	2011-09-23
[redacted]	Wheaton, Illinois, United States	2011-09-23
[redacted]	Spring, Texas, United States	2011-09-23
[redacted]	Imperial Beach, California, United States	2011-09-23
[redacted]	Cedar Rapids, Iowa, United States	2011-09-24
[redacted]	burbank Ca., Alabama, United States	2011-09-24
[redacted]	Plano, Texas, United States	2011-09-24
[redacted]	Stevenage, United Kingdom	2011-09-24
[redacted]	North Miami Beach, Florida, United States	2011-09-24
[redacted]	seattle, Washington, United States	2011-09-24
[redacted]	arlington, Texas, United States	2011-09-24
[redacted]	Keene, New Hampshire, United States	2011-09-24

Name	Location	Date
[redacted]	New York, New York, United States	2011-09-24
	Lynnwood, Washington, United States	2011-09-24
	Beloit, Wisconsin, United States	2011-09-24
	San Pedro, California, United States	2011-09-24
	Margao, Indiana, United States	2011-09-24
	Edison, New Jersey, United States	2011-10-11
	Seattle, Washington, United States	2011-10-11
	philadelphia, Pennsylvania, United States	2011-10-11
	Fort Myers, Florida, United States	2011-10-12
	antwerp, Belgium	2011-10-12
	Topanga, California, United States	2011-10-12
	chicago, Illinois, United States	2011-10-12
	new york, New York, United States	2011-10-12
	New Haven, Connecticut, United States	2011-10-12
	Miami, Florida, United States	2011-10-12
	telluride, Colorado, United States	2011-10-12
	Chicago, Illinois, United States	2011-10-12
	Phoenix, Arizona, United States	2011-10-12
	reading, Pennsylvania, United States	2011-10-12
	Jamestown, New York, United States	2011-10-12
	Garfield Heights, Ohio, United States	2011-10-12
	singapore, Singapore	2011-10-13
	Seattle, Washington, United States	2011-10-13
	Belle Mead, New Jersey, United States	2011-10-13
	Fayetteville, North Carolina, United States	2011-10-13
	North Park, Italy	2011-10-13
	Monroe, North Carolina, United States	2011-10-13
	Buffalo, New York, United States	2011-10-13
	Aloha, Oregon, United States	2011-10-13

Name	Location	Date
[redacted]	Yelm, Washington, United States	2011-10-14
[redacted]	Knoxville, Tennessee, United States	2011-10-14
[redacted]	Zanesville, Ohio, United States	2011-10-14
[redacted]	New York, New York, United States	2011-10-15
[redacted]	Desboro, Ontario, Canada	2011-10-15
[redacted]	Biloxi, Mississippi, United States	2011-10-15
[redacted]	mahebourg, Mauritius	2011-10-15
[redacted]	Riverside, Rhode Island, United States	2011-10-16
[redacted]	Vidor, Texas, United States	2011-10-16
[redacted]	Oradell, New Jersey, United States	2011-10-16
[redacted]	houston, Texas, United States	2011-10-16
[redacted]	Mesa, Arizona, United States	2011-10-16
[redacted]	Valencia, California, United States	2011-10-17
[redacted]	Edison, New Jersey, United States	2011-10-17
[redacted]	Alexandria, Virginia, United States	2011-10-17
[redacted]	Chicago, Illinois, United States	2011-10-18
[redacted]	Ferndale, Michigan, United States	2011-10-19
[redacted]	Sparta, Tennessee, United States	2011-10-19
[redacted]	Reno, Nevada, United States	2011-10-19
[redacted]	south ozone park, New York, United States	2011-10-19
[redacted]	Stephenville, Texas, United States	2011-10-19
[redacted]	Boronia, California, United States	2011-10-19
[redacted]	Spring City, Pennsylvania, United States	2011-10-20
[redacted]	pittsburgh, Pennsylvania, United States	2011-10-20
[redacted]	Bronx, New York, United States	2011-10-20
[redacted]	Orange, California, United States	2011-10-20
[redacted]	Chevy Chase, Maryland, United States	2011-10-20
[redacted]	Batavia, Ohio, United States	2011-10-20
[redacted]	Jamesport, New York, United States	2011-10-20

Name	Location	Date
[redacted]	Missoula, Montana, United States	2011-10-20
[redacted]	Taree, Australia	2011-10-20
[redacted]	Manassas, Virginia, United States	2011-10-20
[redacted]	Indianapolis, Indiana, United States	2011-10-20
[redacted]	Dundas, Canada	2011-10-20
[redacted]	fairfax, Virginia, United States	2011-10-20
[redacted]	Indianapolis, Virgin Islands, U.S.	2011-10-20
[redacted]	valencia, Washington, United States	2011-10-21
[redacted]	port pirie, Australia	2011-10-21
[redacted]	Helsinki, Finland	2011-10-21
[redacted]	North Brunswick, New Jersey, United States	2011-10-21
[redacted]	San Francisco, California, United States	2011-10-22
[redacted]	Houston, Texas, United States	2011-10-22
[redacted]	Boulder, Colorado, United States	2011-10-22
[redacted]	Iowa City, Iowa, United States	2011-10-23
[redacted]	Muncie, Indiana, United States	2011-10-23
[redacted]	Leburn, Kentucky, United States	2011-10-23
[redacted]	Bourbonnais, Illinois, United States	2011-10-23
[redacted]	Tucson, Arizona, United States	2011-10-23
[redacted]	New York, New York, United States	2011-10-23
[redacted]	Charlotte, North Carolina, United States	2011-10-23
[redacted]	Eugene, Oregon, United States	2011-10-23
[redacted]	Ulen, Minnesota, United States	2011-10-23
[redacted]	rochester, New York, United States	2011-10-23
[redacted]	Normal, Illinois, United States	2011-10-23
[redacted]	Colorado Springs, Colorado, United States	2011-10-23
[redacted]	NY, New York, United States	2011-10-24
[redacted]	Edinboro, Pennsylvania, United States	2011-10-24
[redacted]	Dover, New Jersey, United States	2011-10-24

Name	Location	Date
[redacted]	Los Angeles, California, United States	2011-10-24
[redacted]	Riverside, Illinois, United States	2011-10-25
[redacted]	Ann Arbor, Michigan, United States	2011-10-25
[redacted]	homestead, Florida, United States	2011-10-25
[redacted]	Niskayuna, New York, United States	2011-10-25
[redacted]	Greensburg, Indiana, United States	2011-10-25
[redacted]	Beaverton, Oregon, United States	2011-10-25
[redacted]	lewisburg, Pennsylvania, United States	2011-10-25
[redacted]	Highland Park, New Jersey, United States	2011-10-26
[redacted]	Ljubljana, Slovenia	2011-10-26
[redacted]	Seguin, Texas, United States	2011-10-26
[redacted]	Montebello, California, United States	2011-10-26
[redacted]	englewood, New Jersey, United States	2011-10-26
[redacted]	Williamsburg, Virginia, United States	2011-10-26
[redacted]	Vero Beach, Florida, United States	2011-10-26
[redacted]	Staten Island, New York, United States	2011-10-26
[redacted]	Rimini, Italy	2011-10-26
[redacted]	Branchburg, New Jersey, United States	2011-10-26
[redacted]	Neshanic Station, New Jersey, United States	2011-10-27
[redacted]	lynn, Massachusetts, United States	2011-10-27
[redacted]	Olney, Maryland, United States	2011-10-27
[redacted]	Womelsdorf, Pennsylvania, United States	2011-10-27
[redacted]	Branchburg, New Jersey, United States	2011-10-27
[redacted]	Belgrade, Montana, United States	2011-10-27
[redacted]	Lakewood, Colorado, United States	2011-10-28
[redacted]	Miami, Florida, United States	2011-10-28
[redacted]	Stafford Springs, Connecticut, United States	2011-10-28
[redacted]	Charleston, South Carolina, United States	2011-10-28
[redacted]	Arcadia, California, United States	2011-10-28

Name	Location	Date
[redacted]	East Brunswick, New Jersey, United States	2011-10-29
[redacted]	Clearwater, Florida, United States	2011-10-29
[redacted]	Aberdeen, Washington, United States	2011-10-29
[redacted]	Athens, New York, United States	2011-10-29
[redacted]	alleur, Belgium	2011-10-29
[redacted]	Bronx, New York, United States	2011-10-29
[redacted]	fort bragg, California, United States	2011-10-29
[redacted]	Long Island City, New York, United States	2011-10-29
[redacted]	Victoria, Canada	2011-10-29
[redacted]	Colorado Springs, Colorado, United States	2011-10-29
[redacted]	La Selva Beach, California, United States	2011-10-29
[redacted]	Crystal Lake, Illinois, United States	2011-10-30
[redacted]	hay el hamadia, Algeria	2011-10-30
[redacted]	Manhattan, New York, United States	2011-10-30
[redacted]	Toronto, Canada	2011-10-30
[redacted]	Tucker, Georgia, United States	2011-10-30
[redacted]	Baltimore, Maryland, United States	2011-10-31
[redacted]	Kimberly, Alabama, United States	2011-11-01
[redacted]	renkum, Netherlands	2011-11-01
[redacted]	Clawson, Michigan, United States	2011-11-01
[redacted]	Munster, Indiana, United States	2011-11-02
[redacted]	Victoria, Canada	2011-11-02
[redacted]	antioch, California, United States	2011-11-02
[redacted]	Ringoes, New Jersey, United States	2011-11-02
[redacted]	Woodstock, Georgia, United States	2011-11-03
[redacted]	Focsani, Romania	2011-11-04
[redacted]	Focsani, Romania	2011-11-04
[redacted]	focsani, Romania	2011-11-04
[redacted]	Bronx, Spain	2011-11-04

Name	Location	Date
[redacted]	Loudonville, New York, United States	2011-11-04
	Brasov, Romania	2011-11-04
	Louisville, Kentucky, United States	2011-11-04
	Fayetteville, North Carolina, United States	2011-11-05
	Santa Ana, California, United States	2011-11-05
	Merrimack, New Hampshire, United States	2011-11-05
	Seattle, Washington, United States	2011-11-05
	Omaha, Nebraska, United States	2011-11-05
	Tucson, Arizona, United States	2011-11-05
	Memphis, Tennessee, United States	2011-11-05
	Buffalo, New York, United States	2011-11-05
	Boston, Massachusetts, United States	2011-11-05
	Kansas City, Missouri, United States	2011-11-05
	Peking, Idaho, United States	2011-11-05
	Memphis, Tennessee, United States	2011-11-05
	Parker, Colorado, United States	2011-11-05
	Montgomery, Alabama, United States	2011-11-05
	Valparaiso, Indiana, United States	2011-11-06
	Boulder, Colorado, United States	2011-11-06
	staten island, New York, United States	2011-11-07
	Cedar Hill, Texas, United States	2011-11-07
	Orlando, Florida, United States	2011-11-07
	Lake Wales, Florida, United States	2011-11-08
	New York, New York, United States	2011-11-08
	Rochester, New York, United States	2011-11-08
	england, United Kingdom	2011-11-08
	Mississauga, Canada	2011-11-08
	Saltspring Island, Canada	2011-11-09
	Dunedin, New Zealand	2011-11-10

Name	Location	Date
[redacted]	Stratford, Canada	2011-11-10
	avondale, Arizona, United States	2011-11-10
	carlsbad, California, United States	2011-11-10
	towanda, Illinois, United States	2011-11-10
	germantown, Maryland, United States	2011-11-10
	Sheboygan, Wisconsin, United States	2011-11-10
	Old Bridge, New Jersey, United States	2011-11-11
	Carmichael, California, United States	2011-11-11
	Denver, Germany	2011-11-11
	Kimberly, Wisconsin, United States	2011-11-12
	warren, New Jersey, United States	2011-11-12
	Manchester, United Kingdom	2011-11-13
	colorado springs, Colorado, United States	2011-11-13
	erdmannh., Germany	2011-11-13
	macungie, Afghanistan	2011-11-13
	Firgas, Spain	2011-11-14
	fort lauderdale, Florida, United States	2011-11-14
	kronach, Germany	2011-11-14
	Sherman Oaks, California, United States	2011-11-14
	Brisbane, Australia	2011-11-14
	Key LArgo, Florida, United States	2011-11-15
	belleville, Michigan, United States	2011-11-15
	Fort Myers, Florida, United States	2011-11-15
	Portage, Michigan, United States	2011-11-15
	Walnut Creek, California, United States	2011-11-15
	Anchorage, Alaska, United States	2011-11-16
	Evans, Georgia, United States	2011-11-16
	Beverly Hills, California, United States	2011-11-16
	Wisconsin Rapids, Wisconsin, United States	2011-11-16

Name	Location	Date
[redacted]	Oxford, Mississippi, United States	2011-11-17
[redacted]	Boston, Massachusetts, United States	2011-11-17
[redacted]	Alvarado, Texas, United States	2011-11-17
[redacted]	Mantorville, Minnesota, United States	2011-11-18
[redacted]	Providence, Rhode Island, United States	2011-11-18
[redacted]	Huntington, West Virginia, United States	2011-11-19
[redacted]	West New York, Afghanistan	2011-11-19
[redacted]	Washington, District Of Columbia, United States	2011-11-19
[redacted]	El Paso, Texas, United States	2011-11-21
[redacted]	WESTMINSTER, Colorado, United States	2011-11-21
[redacted]	Berkley, California, United States	2011-11-21
[redacted]	Cambridge, Massachusetts, United States	2011-11-21
[redacted]	Baton Rouge, Louisiana, United States	2011-11-21
[redacted]	Phoenix, Arizona, United States	2011-11-21
[redacted]	Emory, Texas, United States	2011-11-21
[redacted]	Milwaukee, Wisconsin, United States	2011-11-22
[redacted]	Miami, Florida, United States	2011-11-22
[redacted]	Colorado Springs, Colorado, United States	2011-11-22
[redacted]	Valparaiso, Indiana, United States	2011-11-22
[redacted]	MARION, Indiana, United States	2011-11-22
[redacted]	Mareeba, Australia	2011-11-22
[redacted]	San Francisco, California, United States	2011-11-22
[redacted]	Cleveland, Ohio, United States	2011-11-22
[redacted]	Allentown, Pennsylvania, United States	2011-11-22
[redacted]	Clearwater, Florida, United States	2011-11-22
[redacted]	South Gate, California, United States	2011-11-22
[redacted]	Philadelphia, Pennsylvania, United States	2011-11-22
[redacted]	Lexington, South Carolina, United States	2011-11-22
[redacted]	Bronx, New York, United States	2011-11-22

Name	Location	Date
[redacted]	St. Paul, Minnesota, United States	2011-11-22
[redacted]	Marshville, North Carolina, United States	2011-11-22
[redacted]	Madison, Alabama, United States	2011-11-22
[redacted]	Louisville, Kentucky, United States	2011-11-22
[redacted]	Albuquerque, New Mexico, United States	2011-11-22
[redacted]	CHADDS FORD, Pennsylvania, United States	2011-11-22
[redacted]	Omaha, Nebraska, United States	2011-11-22
[redacted]	Roanoke, Virginia, United States	2011-11-22
[redacted]	portland, Oregon, United States	2011-11-22
[redacted]	Miami, Florida, United States	2011-11-22
[redacted]	Portland, Oregon, United States	2011-11-23
[redacted]	chino hills, California, United States	2011-11-23
[redacted]	Rockiin, California, United States	2011-11-23
[redacted]	Wallingford, United Kingdom	2011-11-23
[redacted]	edison , New Jersey, United States	2011-11-23
[redacted]	Washington, District Of Columbia, United States	2011-11-23
[redacted]	East Brunswick, New Jersey, United States	2011-11-23
[redacted]	East Brunswick, New Jersey, United States	2011-11-23
[redacted]	Manville, New Jersey, United States	2011-11-23
[redacted]	new brunswick, New Jersey, United States	2011-11-23
[redacted]	east brunswick, New Jersey, United States	2011-11-23
[redacted]	east brunswick, New Jersey, United States	2011-11-23
[redacted]	neptune, New Jersey, United States	2011-11-23
[redacted]	Langley,BC, Canada	2011-11-24
[redacted]	santa Monica, California, United States	2011-11-24
[redacted]	Oakdale, Minnesota, United States	2011-11-24
[redacted]	Palm Coast, Florida, United States	2011-11-24

Name		Location	Date
[redacted]		Statesboro, Georgia, United States	2011-11-24
		Bern, Switzerland	2011-11-24
		marlborough, Massachusetts, United States	2011-11-24
		palm bay, Florida, United States	2011-11-25
		Irvine, California, United States	2011-11-25
		Norwich, New York, United States	2011-11-26
		Edison, New Jersey, United States	2011-11-26
		Arcata, California, United States	2011-11-26
		Newport News, Virginia, United States	2011-11-26
		Seattle, Washington, United States	2011-11-26
		Ulm, Delaware, United States	2011-11-27
		S.C.S., Michigan, United States	2011-11-27
		phoenix, Arizona, United States	2011-11-27
		Aguadilla, Puerto Rico	2011-11-27
		Gtr Manchester, United Kingdom	2011-11-27
		Santa Barbara, California, United States	2011-11-27
		Newman, California, United States	2011-11-27
		Longmont, Colorado, United States	2011-11-28
		Rehoboth, Massachusetts, United States	2011-11-29
		Mamou, Louisiana, United States	2011-11-30
		FREDERICK, Maryland, United States	2011-11-30
		Fort Hood, Texas, United States	2011-11-30
		Bronxville, New York, United States	2011-12-01
		stonington, Connecticut, United States	2011-12-01
		nashua, New Hampshire, United States	2011-12-01
		San Diego, California, United States	2011-12-02
		Jersey City, New Jersey, United States	2011-12-02
		Orlando, Florida, United States	2011-12-02
		Tinley Park, Illinois, United States	2011-12-02

Name	Location	Date
[redacted]	Antioch, California, United States	2011-12-03
	Cottonwood, Arizona, United States	2011-12-04
	NY, New York, United States	2011-12-04
	Boston, Massachusetts, United States	2011-12-04
	Los Angeles, California, United States	2011-12-05
	Bellevue, Washington, United States	2011-12-05
	Istanbul, Turkey	2011-12-05
	Hastings, Nebraska, United States	2011-12-05
	Wilmington, North Carolina, United States	2011-12-05
	huntington beach, California, United States	2011-12-06
	Carmel, Indiana, United States	2011-12-06
	Charlotte, North Carolina, United States	2011-12-06
	Valley Center, California, United States	2011-12-06
	Sydney, Australia	2011-12-06
	Indianapolis, Indiana, United States	2011-12-06
	Melbourne, Australia	2011-12-06
	Kissimmee, Florida, United States	2011-12-06
	BRIDGEWATER, New Jersey, United States	2011-12-07
	Bound Brook, New Jersey, United States	2011-12-07
	San Diego, California, United States	2011-12-07
	glen Rock, New Jersey, United States	2011-12-07
	Piscataway, New Jersey, United States	2011-12-07
	Fanwood, New Jersey, United States	2011-12-07
	Kent, Washington, United States	2011-12-07
	Portland, Oregon, United States	2011-12-07
	Raritan, New Jersey, United States	2011-12-07
	westport, Washington, United States	2011-12-07
	Seymour, Tennessee, United States	2011-12-07
	Tulsa, Oklahoma, United States	2011-12-08

Name	Location	Date
[redacted]	Manchester, Massachusetts, United States	2011-12-08
[redacted]	huntington beach, California, United States	2011-12-08
[redacted]	Little egg harbor, New Jersey, United States	2011-12-08
[redacted]	dahlonega, Georgia, United States	2011-12-08
[redacted]	Hannibal, New York, United States	2011-12-08
[redacted]	Lafayette, Colorado, United States	2011-12-08
[redacted]	indianapolis, Indiana, United States	2011-12-08
[redacted]	Emerson, Georgia, United States	2011-12-09
[redacted]	Evansville, Indiana, United States	2011-12-09
[redacted]	Seekonk, Massachusetts, United States	2011-12-09
[redacted]	Greenfield, Massachusetts, United States	2011-12-10
[redacted]	Hong Kong, Hong Kong	2011-12-10
[redacted]	maynard, Massachusetts, United States	2011-12-10
[redacted]	Lakewood, Ohio, United States	2011-12-11
[redacted]	arcadia, California, United States	2011-12-11
[redacted]	green river, Wyoming, United States	2011-12-11
[redacted]	rancho cucamonga, California, United States	2011-12-11
[redacted]	Ferndale, Michigan, United States	2011-12-12
[redacted]	Murray, Utah, United States	2011-12-12
[redacted]	Manhattan, New York City, New York, United States	2011-12-12
[redacted]	cherry hill, New Jersey, United States	2011-12-13
[redacted]	Van Nuys, California, United States	2011-12-13
[redacted]	Honolulu, Hawaii, United States	2011-12-13
[redacted]	St Catharines, Canada	2011-12-14
[redacted]	Long Beach, California, United States	2011-12-14
[redacted]	Ormond Beach, Florida, United States	2011-12-14
[redacted]	bellevue, Nebraska, United States	2011-12-14

Name	Location	Date
[redacted]	Doral, Florida, United States	2011-12-14
[redacted]	Brooklyn, New York, United States	2011-12-14
[redacted]	East Brunswick, New Jersey, United States	2011-12-14
[redacted]	point pleasant, New Jersey, United States	2011-12-14
[redacted]	houston, Texas, United States	2011-12-14
[redacted]	houston, Texas, United States	2011-12-14
[redacted]	seven hills, Ohio, United States	2011-12-15
[redacted]	Chicago, Illinois, United States	2011-12-15
[redacted]	south amboy, New Jersey, United States	2011-12-15
[redacted]	Lexington, Kentucky, United States	2011-12-15
[redacted]	Andover, New Jersey, United States	2011-12-15
[redacted]	louisville, Kentucky, United States	2011-12-15
[redacted]	Arlington, Texas, United States	2011-12-15
[redacted]	Virginia Beach, Virginia, United States	2011-12-16
[redacted]	Pottstown, Pennsylvania, United States	2011-12-16
[redacted]	DeKalb, Illinois, United States	2011-12-17
[redacted]	Coimbra, Alabama, United States	2011-12-18
[redacted]	Honolulu, Hawaii, United States	2011-12-18
[redacted]	Blaenau Ffestiniog, United Kingdom	2011-12-18
[redacted]	Glen Gardner, New Jersey, United States	2011-12-18
[redacted]	Phoenix, Arizona, United States	2011-12-18
[redacted]	Boston, Massachusetts, United States	2011-12-18
[redacted]	Clarks Summit, Pennsylvania, United States	2011-12-19
[redacted]	Rochester, Minnesota, United States	2011-12-19
[redacted]	Bexley, Ohio, United States	2011-12-19
[redacted]	Clarkston, Washington, United States	2011-12-20
[redacted]	Kittredge, Colorado, United States	2011-12-20
[redacted]	Salzgitter, Germany	2011-12-20
[redacted]	Lansing, Michigan, United States	2011-12-20

Name	Location	Date
[redacted]	Firebaugh, California, United States	2011-12-20
[redacted]	sf, California, United States	2011-12-21
[redacted]	Highland Park, New Jersey, United States	2011-12-22
[redacted]	Somerset, United Kingdom	2011-12-22
[redacted]	glendale, California, United States	2011-12-22
[redacted]	Eureka, California, United States	2011-12-22
[redacted]	Manchester, New Hampshire, United States	2011-12-22
[redacted]	Beloit, Wisconsin, United States	2011-12-22
[redacted]	Bristol, Virginia, United States	2011-12-22
[redacted]	The Plains, Ohio, United States	2011-12-22
[redacted]	Cobb Island, Maryland, United States	2011-12-22
[redacted]	Kennedyville, Maryland, United States	2011-12-22
[redacted]	Boston, Massachusetts, United States	2011-12-22
[redacted]	El Paso, Texas, United States	2011-12-23
[redacted]	Sunset Beach, California, United States	2011-12-23
[redacted]	New York, New York, United States	2011-12-23
[redacted]	Falls Church, Virginia, United States	2011-12-24
[redacted]	Wylie, Texas, United States	2011-12-24
[redacted]	Cesky Krumlov, Armed Forces Pacific, United States	2011-12-24
[redacted]	Arvada, Colorado, United States	2011-12-24
[redacted]	Edmond, Oklahoma, United States	2011-12-24
[redacted]	Lakeland, Florida, United States	2011-12-24
[redacted]	buenos aires, Arkansas, United States	2011-12-25
[redacted]	Roslyn Heights, New York, United States	2011-12-25
[redacted]	Los Angeles, California, United States	2011-12-27
[redacted]	Glasshouse Mountains, Australia	2011-12-27
[redacted]	Granby, Massachusetts, United States	2011-12-27
[redacted]	Calgary, California, United States	2011-12-27
[redacted]	Tempe, Arizona, United States	2011-12-27

Name	Location	Date
[redacted]	Chesterfield, Indiana, United States	2011-12-27
[redacted]	Rockford, Illinois, United States	2011-12-28
[redacted]	atlanta, Georgia, United States	2011-12-28
[redacted]	Brooklyn, New York, United States	2011-12-29
[redacted]	Melbourne, Australia	2011-12-29
[redacted]	Denton, Maryland, United States	2011-12-29
[redacted]	OFalon, Illinois, United States	2011-12-29
[redacted]	Philadelphia, Pennsylvania, United States	2011-12-30
[redacted]	Lahaina, Hawaii, United States	2011-12-31
[redacted]	- -, New York, United States	2011-12-31
[redacted]	Buffalo Grove, Illinois, United States	2011-12-31
[redacted]	Charleston, South Carolina, United States	2011-12-31
[redacted]	Hamburg, Delaware, United States	2011-12-31
[redacted]	London, United Kingdom	2011-12-31
[redacted]	us, California, United States	2012-01-01
[redacted]	Las Vegas, Nevada, United States	2012-01-01
[redacted]	Las Vegas, Nevada, United States	2012-01-01
[redacted]	Nottingham, United Kingdom	2012-01-01
[redacted]	Coquitlam, Canada, Alabama, United States	2012-01-02
[redacted]	New Paltz, New York, United States	2012-01-03
[redacted]	Salt Lake City, Utah, United States	2012-01-03
[redacted]	Austin, Texas, United States	2012-01-04
[redacted]	SHERWOOD, Oregon, United States	2012-01-05
[redacted]	Prague, Czech Republic	2012-01-06
[redacted]	Geneva, Illinois, United States	2012-01-06
[redacted]	Virginia Beach, Afghanistan	2012-01-06
[redacted]	Kokomo, Indiana, United States	2012-01-06
[redacted]	Port St. Lucie, Florida, United States	2012-01-06
[redacted]	brownstown, Michigan, United States	2012-01-06

Name	Location	Date
[redacted]	Pasay, Philippines	2012-01-07
[redacted]	Port Hueneme, California, United States	2012-01-07
[redacted]	El Paso, Texas, United States	2012-01-07
[redacted]	Miami, Florida, United States	2012-01-07
[redacted]	Saginaw, Michigan, United States	2012-01-07
[redacted]	Erdmannh., Germany	2012-01-07
[redacted]	Klamath falls, Oregon, United States	2012-01-07
[redacted]	Medford, Oregon, United States	2012-01-07
[redacted]	Akureyri, Iceland	2012-01-08
[redacted]	Calhoun, Georgia, United States	2012-01-08
[redacted]	white haven, Pennsylvania, United States	2012-01-08
[redacted]	Newark, New Jersey, United States	2012-01-08
[redacted]	Harbor Springs, Michigan, United States	2012-01-08
[redacted]	84106, Utah, United States	2012-01-08
[redacted]	Clinton, Mississippi, United States	2012-01-09
[redacted]	Arvin, California, United States	2012-01-09
[redacted]	Bullhead City, Arizona, United States	2012-01-09
[redacted]	Buzet, Croatia	2012-01-09
[redacted]	Las Vegas, New Mexico, United States	2012-01-09
[redacted]	Massillon, Ohio, United States	2012-01-10
[redacted]	Raleigh, North Carolina, United States	2012-01-10
[redacted]	Wausau, Wisconsin, United States	2012-01-11
[redacted]	Orchard Park, New York, United States	2012-01-11
[redacted]	Pittsford, New York, United States	2012-01-11
[redacted]	Tallahassee, Florida, United States	2012-01-12
[redacted]	Austin, Texas, United States	2012-01-13
[redacted]	Lake Orion, Michigan, United States	2012-01-13
[redacted]	Olympia, Washington, United States	2012-01-13
[redacted]	Gelsenkirchen, Germany	2012-01-13
[redacted]	Tallahassee, Florida, United States	2012-01-13

Name	Location	Date
[redacted]	GLASGOW, United Kingdom	2012-01-14
[redacted]	Burton, Michigan, United States	2012-01-15
[redacted]	lake forest park, Washington, United States	2012-01-15
[redacted]	Glide, Oregon, United States	2012-01-15
[redacted]	Rancho Cucamonga, California, United States	2012-01-16
[redacted]	Augusta, Georgia, United States	2012-01-16
[redacted]	Cinnaminson, New Jersey, United States	2012-01-17
[redacted]	Mestre - VE, Italy	2012-01-17
[redacted]	Monmouth Junction, New Jersey, United States	2012-01-17
[redacted]	Winona, Minnesota, United States	2012-01-18
[redacted]	Everet, Washington, United States	2012-01-18
[redacted]	Coatesville, Pennsylvania, United States	2012-01-18
[redacted]	Brick, New Jersey, United States	2012-01-18
[redacted]	TAMPA, Florida, United States	2012-01-19
[redacted]	Riverside, New Jersey, United States	2012-01-19
[redacted]	Aqtau, Kazakhstan	2012-01-20
[redacted]	Brooklyn, New York, United States	2012-01-20
[redacted]	cherry hill, New Jersey, United States	2012-01-21
[redacted]	Fishers, Indiana, United States	2012-01-22
[redacted]	Fitchburg, Wisconsin, United States	2012-01-22
[redacted]	Whitewater, Wisconsin, United States	2012-01-22
[redacted]	Melbourne, Australia	2012-01-23
[redacted]	Crownsville, Maryland, United States	2012-01-24
[redacted]	Red Bank, New Jersey, United States	2012-01-25
[redacted]	Cranbury, New Jersey, United States	2012-01-25
[redacted]	Fredericksburg, Virginia, United States	2012-01-26
[redacted]	Lindenhurst, New York, United States	2012-01-27
[redacted]	CEDAR RAPIDS, Iowa, United States	2012-01-28

Name	Location	Date
[redacted]	Oakland, California, United States	2012-01-28
[redacted]	Pittsburg, Kansas, United States	2012-01-28
[redacted]	Santa Rosa, California	2012-01-29
[redacted]	Cottage Grove, Minnesota, United States	2012-01-29
[redacted]	Wheaton, Illinois, United States	2012-01-30
[redacted]	Los Angeles, California, United States	2012-01-30
[redacted]	hamburg, Germany	2012-01-30
[redacted]	Keller, Texas, United States	2012-01-31
[redacted]	miami, Florida, United States	2012-01-31
[redacted]	Indianapolis, Indiana, United States	2012-01-31
[redacted]	Naperville, Illinois, United States	2012-01-31
[redacted]	Kokomo, Indiana	2012-01-31
[redacted]	Cheboygan, Michigan, United States	2012-01-31
[redacted]	Madeira Beach, Florida, United States	2012-02-01
[redacted]	Clinton, New Jersey	2012-02-01
[redacted]	N/A, Virginia, United States	2012-02-01
[redacted]	South Bound Brook, New Jersey, United States	2012-02-01
[redacted]	Jacksonville, Florida	2012-02-01
[redacted]	Lindsborg, Kansas	2012-02-02
[redacted]	New Brunswick, New Jersey, United States	2012-02-02
[redacted]	goshen, Indiana, United States	2012-02-03
[redacted]	Orono, Maine, United States	2012-02-03
[redacted]	beauparc,navan, Ireland	2012-02-03
[redacted]	Glenmont, New York, United States	2012-02-03
[redacted]	Bolingbrook, Illinois	2012-02-04
[redacted]	Wyoming, Michigan, United States	2012-02-04
[redacted]	Monroeville, Ohio	2012-02-04
[redacted]	St.Leon-Rot, Delaware, United States	2012-02-04

Name	Location	Date
[redacted]	Wuustwezel, Belgium	2012-02-04
[redacted]	Anderson, Indiana	2012-02-04
[redacted]	matawan, New Jersey	2012-02-05
[redacted]	East Setauket, New York	2012-02-05
[redacted]	Prescott, Arizona, United States	2012-02-05
[redacted]	Port Richey, Florida, United States	2012-02-05
[redacted]	West Harrison, New York, United States	2012-02-05
[redacted]	Houston, Texas, United States	2012-02-06
[redacted]	Medford, Oregon, United States	2012-02-06
[redacted]	North Bend, Washington, United States	2012-02-06
[redacted]	Middletown, Delaware, United States	2012-02-07
[redacted]	ithaca, New York, United States	2012-02-07
[redacted]	San Jose, California, United States	2012-02-07
[redacted]	jackson, Mississippi	2012-02-07
[redacted]	san diego, California	2012-02-08
[redacted]	Arvada, Colorado, United States	2012-02-08
[redacted]	Lanham, Maryland, United States	2012-02-08
[redacted]	Verona, New Jersey, United States	2012-02-08
[redacted]	Gainesville, Florida, United States	2012-02-08
[redacted]	Tucson, Arizona, United States	2012-02-09
[redacted]	Santa Clarita, California, United States	2012-02-09
[redacted]	Sarasota, Florida, United States	2012-02-09
[redacted]	Willits, California, United States	2012-02-09
[redacted]	Orlando, Florida, United States	2012-02-09
[redacted]	Beaverton, Oregon, United States	2012-02-09
[redacted]	St Louis, Missouri, United States	2012-02-10
[redacted]	Dothan, Alabama, United States	2012-02-10
[redacted]	Brunswick, New York, United States	2012-02-10
[redacted]	Marco Island, Florida	2012-02-12
[redacted]	New York, New York	2012-02-12

Name	Location	Date
[redacted]	KISSIMMEE, Florida, United States	2012-02-12
[redacted]	Denver, Colorado	2012-02-12
[redacted]	Granton, Wisconsin, United States	2012-02-12
[redacted]	Santa Fe, New Mexico, United States	2012-02-12
[redacted]	Eagle, Colorado, United States	2012-02-12
[redacted]	wildomar, California, United States	2012-02-12
[redacted]	Monson, Massachusetts, United States	2012-02-12
[redacted]	navan, Ireland	2012-02-12
[redacted]	HOLLYWOOD, Florida, United States	2012-02-12
[redacted]	Navan, Ireland	2012-02-12
[redacted]	Calgary, Canada	2012-02-12
[redacted]	Sutton, Alaska, United States	2012-02-12
[redacted]	León, Spain	2012-02-12
[redacted]	Bariloche, Alabama, United States	2012-02-13
[redacted]	Denver, Colorado, United States	2012-02-13
[redacted]	Brookline, Massachusetts, United States	2012-02-13
[redacted]	Blairsville, Pennsylvania	2012-02-13
[redacted]	San Diego, California, United States	2012-02-13
[redacted]	Edison, New Jersey, United States	2012-02-13
[redacted]	Edison, New Jersey, United States	2012-02-13
[redacted]	Seattle, Washington	2012-02-13
[redacted]	Tucson, Arizona, United States	2012-02-14
[redacted]	Pinole, California	2012-02-14
[redacted]	Austin, Texas, United States	2012-02-14
[redacted]	Richmond, California, United States	2012-02-14
[redacted]	Grand Forks, North Dakota	2012-02-14
[redacted]	Dry Prong, Louisiana, United States	2012-02-14
[redacted]	norman, Oklahoma, United States	2012-02-14
[redacted]	Moscow, Idaho, United States	2012-02-14
[redacted]	michigan, New York, United States	2012-02-14

Name	Location	Date
[redacted]	Jacksonville, Florida, United States	2012-02-14
[redacted]	New York, New York, United States	2012-02-14
[redacted]	Carnago, Italy	2012-02-14
[redacted]	Newark, Delaware, United States	2012-02-14
[redacted]	Hesperia, California, United States	2012-02-14
[redacted]	Cookeville, Tennessee, United States	2012-02-14
[redacted]	Orange, California	2012-02-14
[redacted]	Randburg, South Africa	2012-02-14
[redacted]	High Point, North Carolina	2012-02-14
[redacted]	Colonia, New Jersey, United States	2012-02-14
[redacted]	Bochnia, Poland	2012-02-14
[redacted]	La Crescenta, California, United States	2012-02-15
[redacted]	Monmouth Junction, New Jersey	2012-02-15
[redacted]	Jersey City, New Jersey, United States	2012-02-15
[redacted]	Emporium, Pennsylvania	2012-02-15
[redacted]	Phoenix, Arizona, United States	2012-02-15
[redacted]	Lincoln, Alabama, United States	2012-02-15
[redacted]	ithaca, New York, United States	2012-02-15
[redacted]	Eden Prairie, Minnesota, United States	2012-02-15
[redacted]	South Portland, Maine, United States	2012-02-15
[redacted]	Nyack, New York	2012-02-16
[redacted]	savannah, Georgia	2012-02-16
[redacted]	Zagreb, Croatia	2012-02-16
[redacted]	Paso Robles, California, United States	2012-02-16
[redacted]	Dover, Delaware, United States	2012-02-17
[redacted]	victoria, Illinois, United States	2012-02-17
[redacted]	Orangeburg, South Carolina, United States	2012-02-17
[redacted]	Redmond, Washington, United States	2012-02-17
[redacted]	Milwaukee, Wisconsin, United States	2012-02-17

Name	Location	Date
[redacted]	Cambridge, Massachusetts	2012-02-18
	Banning, California, United States	2012-02-18
	Monroeton, Pennsylvania, United States	2012-02-18
	Austin, Texas, United States	2012-02-18
	magnolia, Texas	2012-02-18
	haverhill, Massachusetts, United States	2012-02-18
	Brooklyn, New York, United States	2012-02-19
	Sherman Oaks, California, United States	2012-02-19
	Farmington, New Mexico, United States	2012-02-19
	brisbane, Australia	2012-02-20
	Baytown, Texas, United States	2012-02-20
	Naalehu, Hawaii	2012-02-20
	Alderley, Australia	2012-02-20
	Highland Park, Illinois, United States	2012-02-20
	Murfreesboro, Tennessee, United States	2012-02-20
	New York, Australia	2012-02-21
	brunswick, Australia	2012-02-21
	Bridgewater, New Jersey, United States	2012-02-21
	Belfast, United Kingdom	2012-02-21
	marietta, Pennsylvania	2012-02-21
	beverly, Massachusetts	2012-02-21
	Stephentown, New York, United States	2012-02-21
	Middleburg, Virginia, United States	2012-02-21
	Newburyport, Massachusetts	2012-02-21
	Charlottesville, Virginia	2012-02-22
	Cookstown, New Jersey, United States	2012-02-22
	Eureka, Missouri, United States	2012-02-22
	Newport News, Virginia, United States	2012-02-22
	Polk, Florida, United States	2012-02-22
	Jacksonville, Florida	2012-02-22

Name	Location	Date
[redacted]	Allegany, New York, United States	2012-02-23
	INDIANAPOLIS, Indiana	2012-02-23
	Longview, Washington, United States	2012-02-23
	guerneville, California	2012-02-23
	Laporte, Colorado, United States	2012-02-23
	Heber Springs, Arkansas, United States	2012-02-23
	Redding, Connecticut	2012-02-23
	Brick, New Jersey, United States	2012-02-23
	Mendota Heights, Minnesota	2012-02-23
	Rockaway Park, New York	2012-02-23
	Cornwall Bridge, Connecticut, United States	2012-02-23
	Livonia, Michigan, United States	2012-02-23
	Baltimore, Maryland, United States	2012-02-24
	Brentwood, Maryland, United States	2012-02-24
	Baldwin Park, California, United States	2012-02-24
	Sydney, Australia	2012-02-24
	colo spgs, Colorado, United States	2012-02-24
	Danbury, Connecticut, United States	2012-02-24
	Huntington Beach, California, United States	2012-02-24
	Lancaster, Pennsylvania, United States	2012-02-24
	Barnegat, New Jersey, United States	2012-02-24
	chicago, Illinois, United States	2012-02-24
	WANTIRNA, Australia	2012-02-24
	north bergen, New Jersey, United States	2012-02-25
	Kortrijk-Heule West-Vlaanderen Belgie, Nebraska, United States	2012-02-25
	Puunene, Hawaii, United States	2012-02-25
	Jacksonville, Florida, United States	2012-02-25
	Chesapeake, Virginia, United States	2012-02-25

Name	Location	Date
[redacted]	Cambridge, Massachusetts, United States	2012-02-25
	Norwich, United Kingdom	2012-02-25
	Royal Oak, Michigan, United States	2012-02-25
	Tampa, Florida, United States	2012-02-26
	Royersford, Pennsylvania, United States	2012-02-26
	Shirley, New York, United States	2012-02-26
	gaithersburg, Maryland, United States	2012-02-26
	Grand Forks, North Dakota, United States	2012-02-26
	van nuys, California, United States	2012-02-26
	Oak Ridge, Tennessee, United States	2012-02-26
	Skillman, New Jersey, United States	2012-02-26
	Henniker, New Hampshire, United States	2012-02-27
	Bartow, Florida, United States	2012-02-27
	Manalapan, New Jersey, United States	2012-02-27
	Brampton, Canada	2012-02-27
	rockford, Illinois, United States	2012-02-27
	Kingston, Georgia, United States	2012-02-27
	Hackettstown, New Jersey, United States	2012-02-27
	Santa Clarita, California, United States	2012-02-27
	vienna, New Jersey, United States	2012-02-27
	Staten Island, New York, United States	2012-02-27
	Scottsdale, Arizona, United States	2012-02-27
	Austin, Texas, United States	2012-02-27
	Bayside, New York, United States	2012-02-28
	Dublin, Ohio, United States	2012-02-28
	Sacramento, California, United States	2012-02-28
	Goodyear, Arizona, United States	2012-02-28
	Leonardo, New Jersey, United States	2012-02-28
	Cleveland, Tennessee, United States	2012-02-28
	bath, Alaska, United States	2012-02-28

Name	Location	Date
[redacted]	johnson city, New York, United States	2012-02-28
	Cinnaminson , New Jersey, United States	2012-02-28
	New Westminster, Canada	2012-02-28
	West Vancouver, Canada	2012-02-29
	cinnaminson , New Jersey, United States	2012-02-29
	Atascadero, California, United States	2012-02-29
	Massapequa, New York, United States	2012-02-29
	Dobbs Ferry, New York, United States	2012-02-29
	Ossining, New York, United States	2012-02-29
	Philadelphia, Pennsylvania, United States	2012-03-01
	Severn, Maryland, United States	2012-03-01
	South Bound Brook, New Jersey, United States	2012-03-01
	Antioch, California, United States	2012-03-01
	bound brook, New Jersey, United States	2012-03-02
	huntersville, North Carolina, United States	2012-03-02
	Fanwood, New Jersey, United States	2012-03-02
	Hillsborough, New Jersey, United States	2012-03-02
	battle creek, Michigan, United States	2012-03-02
	san francisco, California, United States	2012-03-02
	Arlington, Texas, United States	2012-03-02
	Dallas, Texas, United States	2012-03-02
	Santa Rosa, California, United States	2012-03-03
	neuss, Germany	2012-03-03
	Phoenix, Arizona, United States	2012-03-03
	Brooklyn, New York, United States	2012-03-03
	perry, Georgia, United States	2012-03-03
	Hamburg, Germany	2012-03-03
	Robbinsville, New Jersey, United States	2012-03-03
	W.W., Rhode Island, United States	2012-03-03

Name	Location	Date
[redacted]	Des Moines, Iowa, United States	2012-03-03
	Kernersville, North Carolina, United States	2012-03-03
	Brick, New Jersey, United States	2012-03-03
	Austin, Texas, United States	2012-03-04
	south plainfield, New Jersey, United States	2012-03-04
	West Hollywood, California, United States	2012-03-04
	Bay Shore, New York, United States	2012-03-04
	silver spring, Maryland, United States	2012-03-05
	Watsonville, California, United States	2012-03-05
	Red Bay, Alabama, United States	2012-03-05
	Dalton, Georgia, United States	2012-03-05
	BANGOR, Maine, United States	2012-03-05
	Depew, New York, United States	2012-03-05
	Tallahassee, Florida, United States	2012-03-06
	Brampton, Canada	2012-03-06
	El Cajon, California, United States	2012-03-06
	Portsmouth, Virginia, United States	2012-03-06
	bound brook, New Jersey, United States	2012-03-06
	tybee island, Georgia, United States	2012-03-06
	Pittstown, New Jersey, United States	2012-03-06
	P, Italy	2012-03-07
	East Brunswick, New Jersey, United States	2012-03-07
	Union, New Jersey, United States	2012-03-07
	Conway, New Hampshire, United States	2012-03-07
	clyde, North Carolina, United States	2012-03-08
	Philadelphia, Pennsylvania, United States	2012-03-08
	forsyth, Missouri, United States	2012-03-08
	Sault Ste. Marie, Michigan, United States	2012-03-08
	North Guwahati, India	2012-03-08

Name	Location	Date
[redacted]	Three Rivers, Michigan, United States	2012-03-08
[redacted]	Dewitt, New York, United States	2012-03-08
[redacted]	winters, California, United States	2012-03-08
[redacted]	STOCKTON, California, United States	2012-03-09
[redacted]	Vancouver, Canada	2012-03-09
[redacted]	Montgomery, Alabama, United States	2012-03-09
[redacted]	Honokaa, Hawaii, United States	2012-03-09
[redacted]	Mountlake Terrace, Washington, United States	2012-03-09
[redacted]	brooklyn center, Minnesota, United States	2012-03-10
[redacted]	Mentor, Ohio, United States	2012-03-10
[redacted]	Schaumburg, Illinois, United States	2012-03-10
[redacted]	Alhambra, California, United States	2012-03-10
[redacted]	Hastings, Michigan, United States	2012-03-10
[redacted]	Bridgewater, New Jersey, United States	2012-03-10
[redacted]	Jersey City, New Jersey, United States	2012-03-10
[redacted]	FORT WORTH, Texas, United States	2012-03-10
[redacted]	Branchburg Twp, New Jersey, United States	2012-03-10
[redacted]	Palmdale, California, United States	2012-03-10
[redacted]	North Port, Florida, United States	2012-03-11
[redacted]	Bloomfield,Ont., California, United States	2012-03-11
[redacted]	Wilton, Connecticut, United States	2012-03-11
[redacted]	rockland, Massachusetts, United States	2012-03-11
[redacted]	High Point, North Carolina, United States	2012-03-11
[redacted]	Brooklyn, New York, United States	2012-03-11
[redacted]	Longmont, Colorado, United States	2012-03-11
[redacted]	okatie, South Carolina, United States	2012-03-12
[redacted]	Ocala, Florida, United States	2012-03-12
[redacted]	Harbor Springs, Michigan, United States	2012-03-12

Name	Location	Date
[redacted]	Melbourne, Australia	2012-03-13
[redacted]	LAURYS STA, Pennsylvania, United States	2012-03-13
[redacted]	brooklyn, New York, United States	2012-03-13
[redacted]	New York City, Canada	2012-03-14
[redacted]	Holden, Massachusetts, United States	2012-03-14
[redacted]	San Jose, California, United States	2012-03-15
[redacted]	Boonton, New Jersey, United States	2012-03-15
[redacted]	sarasota, Florida, United States	2012-03-15
[redacted]	Middletown, New Jersey, United States	2012-03-15
[redacted]	Lake Echo, Canada	2012-03-15
[redacted]	Monticello, Kentucky, United States	2012-03-15
[redacted]	north arlington, New Jersey, United States	2012-03-16
[redacted]	Pomona, New Jersey, United States	2012-03-16
[redacted]	Hettlingen, Switzerland	2012-03-16
[redacted]	Rockford, Illinois, United States	2012-03-17
[redacted]	Doncaster, United Kingdom	2012-03-17
[redacted]	Winfield, Missouri, United States	2012-03-18
[redacted]	fair haven, New Jersey, United States	2012-03-19
[redacted]	Cape May, New Jersey, United States	2012-03-19
[redacted]	Pompton Lakes, New Jersey, United States	2012-03-19
[redacted]	Pompton Lakes, New Jersey, United States	2012-03-19
[redacted]	San Diego, California, United States	2012-03-19
[redacted]	Milford, Connecticut, United States	2012-03-19
[redacted]	Clarksville, Tennessee, United States	2012-03-20
[redacted]	Wauwatosa, Wisconsin, United States	2012-03-20
[redacted]	boynton beach, Florida, United States	2012-03-20
[redacted]	Aurora, Illinois, United States	2012-03-21
[redacted]	Roselle, New Jersey, United States	2012-03-22

Name	Location	Date
[redacted]	Westborough, Massachusetts, United States	2012-03-22
	white lake, Michigan, United States	2012-03-22
	Neptune City, New Jersey, United States	2012-03-22
	Boston, Massachusetts, United States	2012-03-22
	aguada, Puerto Rico, United States	2012-03-22
	Broolkyn, New York, United States	2012-03-22
	Kamloops, Canada	2012-03-23
	Everett, Washington, United States	2012-03-23
	Tampa, Florida, United States	2012-03-24
	Pico, Portugal	2012-03-24
	Phoenix, Arizona, United States	2012-03-24
	brooklyn, New York, United States	2012-03-24
	Point Reyes Station, California, United States	2012-03-24
	Ogdensburg, New York, United States	2012-03-25
	sydney, Australia	2012-03-25
	Hickory, North Carolina, United States	2012-03-25
	Las Vegas, Nevada, United States	2012-03-27
	Cincinnati, Ohio, United States	2012-03-27
	Perth Amboy, New Jersey, United States	2012-03-27
	Escondido, California, United States	2012-03-29
	Glen Allen, Virginia, United States	2012-03-29
	Glen Allen, Virginia, United States	2012-03-29
	Madison, Wisconsin, United States	2012-03-29
	Charlotte, North Carolina, United States	2012-03-29
	KANSAS CITY, Kansas, United States	2012-03-29
	Rockford, Michigan, United States	2012-03-29
	Akron, Ohio, United States	2012-03-29
	San Francisco, California, United States	2012-03-30
	Middletown, New Jersey, United States	2012-03-31

Name	Location	Date
[redacted]	san diego, California, United States	2012-03-31
[redacted]	sherrill, New York, United States	2012-03-31
[redacted]	South Beloit, Illinois, United States	2012-03-31
[redacted]	Milford, Pennsylvania, United States	2012-03-31
[redacted]	San Francisco, California, United States	2012-03-31
[redacted]	Tujunga, California, United States	2012-04-01
[redacted]	ankara, Turkey	2012-04-01
[redacted]	Edison, New Jersey, United States	2012-04-01
[redacted]	Sacramento, California, United States	2012-04-02
[redacted]	Warner Robins, Georgia, United States	2012-04-02
[redacted]	Highlands ranch, Colorado, United States	2012-04-03
[redacted]	St. Petersburg, Florida, United States	2012-04-03
[redacted]	Southport, North Carolina, United States	2012-04-03
[redacted]	West Columbia, South Carolina, United States	2012-04-03
[redacted]	hicksville, New York, United States	2012-04-04
[redacted]	Hamilton, Ohio, United States	2012-04-04
[redacted]	Culpeper, Virginia, United States	2012-04-04
[redacted]	Anchorage, Alaska, United States	2012-04-05
[redacted]	New Brunswick, New Jersey, United States	2012-04-06
[redacted]	mccaysville, Georgia, United States	2012-04-06
[redacted]	Portland, Oregon, United States	2012-04-06
[redacted]	Glen Allen, Virginia, United States	2012-04-06
[redacted]	Hackettstown, New Jersey, United States	2012-04-06
[redacted]	Prior Lake, Minnesota, United States	2012-04-07
[redacted]	Conshohocken, Pennsylvania, United States	2012-04-07
[redacted]	Moorhead, Minnesota, United States	2012-04-08
[redacted]	Rancho Palos Verdes, California, United States	2012-04-09

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To: The Governor of NJ, State Sen. Michael Doherty (NJ-023), State Sen. Christopher Bateman (NJ-016), State Sen. Barbara Buono (NJ-018), State Sen. Raymond Lesniak (NJ-020), State Sen. Stephen Sweeney (NJ-003), State Sen. Bob Smith (NJ-017), Sen. Frank Lautenberg (NJ), Sen. Robert Menendez (NJ), Rep. Rush Holt (NJ-12), Rep. Frank Pallone (NJ-06), Sen. Barbara Boxer (CA), Rep. Leonard Lance (NJ-07), Rep. Rodney Frelinghuysen (NJ-11), USEPA Remedial Project Manager (Joseph Battipaglia), USEPA Region 2 Administrator (Judith Enck), USEPA Region 2 Superfund Chief (Walter Mugdan), NJDEP Commissioner (Bob Martin), MSNBC (Rachel Maddow), Mayor of Bridgewater (Daniel J. Hayes, Jr), Mayor of Manville (Angelo Corradino), Senator Robert Menendez, Representative Rodney Frelinghuysen, Representative Rush Holt, Senator Barbara Boxer, Representative Leonard Lance, Senator Christopher Bateman, Senator Raymond Lesniak, Pfizer (Wendy Lazarus), Pfizer (Russell Downey), USEPA Administrator (Lisa Jackson), Mayor of Bound Brook (Carey Pilato), CEO of Pfizer (Ian Read), Pfizer Executive Vice President, Policy, External Affairs and Communications (Sally Susman), Pfizer Executive Vice President, Chief Financial Officer and Business Operations (Frank D'Amelio), CRISIS Technical Advisor, CRISIS Technical Advisor, CRISIS Technical Advisor, and CRISIS Technical Advisor

Subject: Re: American Cyanamid Proposed Plan Comment

Letter:

Dear USEPA Regulators, Elected Officials, and Pfizer Representatives,

I respectfully request that the United States Environmental Protection Agency (USEPA) requires Pfizer to permanently remediate the 80-year old leaking toxic dump, the American Cyanamid Superfund Site in Bridgewater, NJ. Please include my comments as part of the official public record. In order to protect human health and the environment, USEPA must require Pfizer to remediate the site using a modified version of "Alternative 7," and not "Alternative 4A," as described in their 2012 Proposed Plan. Alternative 4A is one of the least costly for alternatives for Pfizer, and is only a quarter of the cost of a comprehensive cleanup. USEPA needs to go back and reevaluate their options and present the public with a more comprehensive plan that is protective of both human health and the environment.

The selected remedy, Alternative 4A, will not be protective of human health and the environment for the following reasons: Filling in a floodplain and capping the site is NOT a full remediation. Pfizer claims there will be no net filling. That is not true as the entire area, not just the fenced site, is in the floodplain. Also, the effect on solidifying parts of the site and capping a floodplain this large is not a permanent long-term solution - it's an engineering control. All caps fail, it's just a matter of time.

I am also highly concerned that Alternative 4A will drastically expand serious toxic flooding for thousands of neighboring families that are already plagued by heavy flood waters. The Proposed Plan Alternative 4A proposes to cover the contamination with a combination of soil and engineering caps,

R2-0007668

which will take 10 years to implement. For the larger portions of the site, Pfizer proposes to raise the gradient two feet. As you are aware, this site lies in the floodplain and, as the most recent flood of Hurricane Irene shows, the American Cyanamid Site can hold about 300,000,000 gallons of water. Placing two feet of fill on the site will reduce its flood storage capacity and could exacerbate the regional flood issue in the area. The USEPA claims that this cap will be built to withstand a 500-year flood. This area floods regularly just with normal amounts of rain, and a cap would fail way before a 500-year flood occurs.

In addition, filling of a flood zone is subject to both New Jersey and Federal regulations. These regulations specify that there can be no net filling of the wetlands or a flood zone, which means you cannot fill one area of the site without removing fill from some other location so the status quo doesn't change. The Proposed Plan is completely silent of the impacts of filling, and this most critical aspect of the American Cyanamid site MUST be clearly presented. The implemented plan must assure it will not exacerbate flooding in the lower Raritan River. The U.S. Army Corps of Engineers is actively working on flood control projects in the Raritan River Watershed to help alleviate flooding in Manville, Bound Brook, Bridgewater and all surrounding towns. The American Cyanamid site is a natural fit for a regional flood control project and can be an environmental benefit for the region if the proper remedy is selected.

CRISIS - an ineffectual "advocacy group" responsible for dissemination of information and cleanup options on the site - spent over $235,000 of federal taxpayer money to have a technical advisor review documents and evaluate cleanup options. With all this taxpayer money down the drain, the question that has to be raised is why CRISIS and their technical advisors cannot come up with an actual permanent cleanup solution?

The Proposed Plan outlines more applicable cleanup alternatives than Alternative 4A suggests, including low temperature desorption (Alternative 7). This method was successfully used at the Cornell-Dubilier Superfund Site in South Plainfield, NJ to remediate soils with high levels of PCBs and heavy metals without disturbing the surrounding community. In addition, USEPA and Pfizer can make use of an active rail line that runs through the site to properly dispose of this material. The cost estimates for the alternatives seem very high and there must be a detailed analysis for the cost of a low temperature thermal desorption unit.

USEPA must look at low temperature thermal desorption in combination with other techniques, such as off-site disposal at their existing RCRA facility across the street, and other innovative technologies, such as bio remediation with specialized microorganisms. These contaminants lend themselves to thermal destruction offsite. The USEPA must choose the most protective remedy now and implement it in an acceptable time frame.
Capping a site should not take 10 years to complete, which means the time frames for other alternatives are probably exaggerated as well.

Why did USEPA allow the responsible party to stop the cleanup midstream after the record of decision was signed, and then let the site languish for another eight years? This current plan for capping a toxic waste floodplain is unacceptable and threatens the Raritan River Estuary and the millions of New Jersey residents who live near or downstream from the site. USEPA has mishandled this site from the beginning, and it's time to put the residents first. A scathing report by the USEPA Attorney General documents that USEPA and NJDEP did not ensure this Superfund site cleanup progressed at a timely pace, along with numerous other failures. The report can be found here: http://www.epa.gov/oig/reports/2008/20080602-08-P-0169.pdf.

This site cleanup has been languishing for over two decades, and it is time for USEPA to take serious action. In order to protect the health and safety of families that utilize this area for recreation, USEPA must require a proper cleanup, such as a modified version of Alternative 7 in the Proposed Plan. Capping this site violates USEPA's preference for permanent, cost effective, and protective cleanups, as caps always fail, especially in a floodplain. Other alternatives offer more permanent solutions for this cleanup.

This year, Pfizer will spend upwards of $8 billion on research. With some of the finest minds in the world and a CEO with a chemical engineering degree, why is Pfizer using cheap and outdated technology to cleanup this site? We need USEPA to protect public health and the environment, not the profits of Pfizer Executives Ian Read, Sally Susman, and Frank D'Amelio!

With dozens of permanent environmental cleanup options, which are being used throughout the United States, why is the lowest cost and least protective technology being thrown out as the only solution? This raises serious questions of the technical competency of not only CRISIS' "technical advisor", but all the stakeholders involved in this cleanup proposal.

I support the plans put forth by the nationally recognized environmental expert, the nonprofit Edison Wetlands Association, and their scientists and engineers to bring in a low temperature thermal desorption unit as well as utilize other technologies as appropriate for the various toxic and other wastes disposed of on site. I want other treatment technologies used that permanently remediate, not cap or solidify, the waste on site. Capping and/or solidifying the toxic and other wastes on site should not be used under any circumstances in this floodplain. Thank you for your timely assistance on this important environmental issue.

Respectfully,

Signatures

Name		Location	Date
[redacted]		Edison, New Jersey, United States	2012-02-24
[redacted]		Old Bridge, New Jersey, United States	2012-02-24
[redacted]		Camden, New Jersey, United States	2012-02-24
[redacted]		Pompton Lakes, New Jersey, United States	2012-02-24
[redacted]		East Brunswick, New Jersey, United States	2012-02-24
[redacted]		Morrice, Michigan, United States	2012-02-24
[redacted]		Pleasant Hill, California, United States	2012-02-24
[redacted]		Chicago, Illinois, United States	2012-02-24
[redacted]		Seaside Heights, New Jersey, United States	2012-02-24
[redacted]		Los Angeles, California, United States	2012-02-24
[redacted]		Pompton Lakes, New Jersey, United States	2012-02-24
[redacted]		Bloomfiled, New Jersey, United States	2012-02-24
[redacted]		Hasselt, Belgium	2012-02-24
[redacted]		St Augustine, Florida, United States	2012-02-24
[redacted]		Linden, New Jersey, United States	2012-02-24
[redacted]		Pompton Lakes, New Jersey, United States	2012-02-24
[redacted]		Ava, Missouri, United States	2012-02-24
[redacted]		colo spgs, Colorado, United States	2012-02-24
[redacted]		Edison, New Jersey, United States	2012-02-24
[redacted]		Mountain View, California, United States	2012-02-24
[redacted]		Toms River, New Jersey, United States	2012-02-24
[redacted]			2012-02-24
[redacted]		Kendall Park, New Jersey, United States	2012-02-24
[redacted]		edison, New Jersey, United States	2012-02-24
[redacted]		Chatham, New Jersey, United States	2012-02-24
[redacted]		South Amboy, New Jersey, United States	2012-02-24
[redacted]		Edison, New Jersey, United States	2012-02-24

Name	Location	Date
[redacted]	Pompton Lakes, New Jersey, United States	2012-02-24
[redacted]	Highlands, New Jersey, United States	2012-02-24
[redacted]	Denver, Colorado, United States	2012-02-24
[redacted]	Edison, New Jersey, United States	2012-02-24
[redacted]	Glenmont, New York, United States	2012-02-24
[redacted]	Wolf Creek, Oregon, United States	2012-02-24
[redacted]	HOPEWELL JUNCTION, New York, United States	2012-02-24
[redacted]	New Brunswick, New Jersey, United States	2012-02-24
[redacted]	Plano, Texas, United States	2012-02-24
[redacted]	Yalta, Alabama, United States	2012-02-24
[redacted]	Florham Park, New Jersey, United States	2012-02-24
[redacted]	Burlington, Vermont, United States	2012-02-24
[redacted]	Focsani, Romania	2012-02-24
[redacted]	New Brunswick, New Jersey, United States	2012-02-24
[redacted]	edison, New Jersey, United States	2012-02-24
[redacted]	Red Bank, New Jersey, United States	2012-02-24
[redacted]	Sleepy Hollow, Illinois, United States	2012-02-24
[redacted]	Rutherford, New Jersey, United States	2012-02-24
[redacted]	Woodbridge, New Jersey, United States	2012-02-24
[redacted]	New Brunswick, New Jersey, United States	2012-02-24
[redacted]	Holmdel, New Jersey, United States	2012-02-24
[redacted]	chicago, Illinois, United States	2012-02-24
[redacted]	New Brunswick, New Jersey, United States	2012-02-24
[redacted]	Edison, New Jersey, United States	2012-02-24
[redacted]	Quinton, Virginia, United States	2012-02-24
[redacted]	High Springs, Florida, United States	2012-02-24
[redacted]	highland park, New Jersey, United States	2012-02-24

Name	Location	Date
[redacted]	Cliffwood Beach, New Jersey, United States	2012-02-24
	Sauk City, Wisconsin, United States	2012-02-24
	elmwood park, New Jersey, United States	2012-02-24
	Binghamton, New York, United States	2012-02-24
	Edison, New Jersey, United States	2012-02-25
	Rutland, Vermont, United States	2012-02-25
	North Brunswick Twp, New Jersey, United States	2012-02-25
	Long Branch, New Jersey, United States	2012-02-25
	Plainsboro, New Jersey, United States	2012-02-25
	Chicago, Illinois, United States	2012-02-25
	Hillsborough, New Jersey, United States	2012-02-25
	Monmouth Junction, New Jersey, United States	2012-02-25
	Rutland, Vermont, United States	2012-02-25
	pompton lakes nj, New Jersey, United States	2012-02-25
	Westfield, New Jersey, United States	2012-02-25
	Phoenix, Arizona, United States	2012-02-25
	Leadville, Colorado, United States	2012-02-25
	Macedonia, Germany	2012-02-25
	Bound Brook, New Jersey, United States	2012-02-25
	flagstaff, Arkansas, United States	2012-02-25
	CHESAPEAKE, Virginia, United States	2012-02-25
	Dayton, New Jersey, United States	2012-02-25
	Eliot, Maine, United States	2012-02-25
	St. Pölten, Austria	2012-02-25
	Orrefors, Sweden	2012-02-25
	Pasadena, Maryland, United States	2012-02-25
	fort lauderdale, Florida, United States	2012-02-25
	Webster, Texas, United States	2012-02-26

Name	Location	Date
[redacted]	Edmond, Oklahoma, United States	2012-02-26
	Dayton, New Jersey, United States	2012-02-26
	Vienna, Arizona, United States	2012-02-26
	Mansfield Center, Connecticut, United States	2012-02-26
	Sussex, Wisconsin, United States	2012-02-26
	Los Angeles, California, United States	2012-02-26
	Sosnowiec, Poland	2012-02-26
	Metz, France	2012-02-26
	McKenzie, Tennessee, United States	2012-02-26
	Scotch Plains, New Jersey, United States	2012-02-26
	North Plainfield, New Jersey, United States	2012-02-26
	Escondido, California, United States	2012-02-26
	ALDERSHOT, United Kingdom	2012-02-26
	Ivanic, Croatia	2012-02-26
	Washington, Georgia, United States	2012-02-26
	Manhattan, New York, United States	2012-02-26
	Dublin., Illinois, United States	2012-02-26
	Madrid/Spain, Alabama, United States	2012-02-26
	Mansfield Center, Connecticut, United States	2012-02-26
	piedmont, California, United States	2012-02-26
	Lincoln, Alabama, United States	2012-02-26
	Caldas da Rainha, Portugal	2012-02-26
	Arnold, Missouri, United States	2012-02-26
	Oregon City, Oregon, United States	2012-02-26
	Klamath Falls, Oregon, United States	2012-02-26
	Sonoma, California, United States	2012-02-26
	Merville, Canada	2012-02-26
	Long Island City, New York, United States	2012-02-26

Name	Location	Date
[redacted]	Culver City, California, United States	2012-02-26
	Seattle, Washington, United States	2012-02-26
	Reno, Nevada, United States	2012-02-26
	Trabuco Canyon, California, United States	2012-02-26
	Providence, Rhode Island, United States	2012-02-26
	Washington Island, Wisconsin, United States	2012-02-26
	Tampa, Florida, United States	2012-02-26
	south fork, Colorado, United States	2012-02-26
	commack, New York, United States	2012-02-26
	chatel-st-denis, Mississippi, United States	2012-02-26
	Denver, Colorado, United States	2012-02-26
	Bottrop, Indiana, United States	2012-02-26
	Cameron Park, California, United States	2012-02-26
	Blacksburg, Virginia, United States	2012-02-26
	Tappan, New York, United States	2012-02-26
	Montpellier, Vermont, United States	2012-02-26
	Smyrna, Georgia, United States	2012-02-26
	Azusa, California, United States	2012-02-26
	belmont, California, United States	2012-02-26
	New York, New York, United States	2012-02-26
	Bothell, Washington, United States	2012-02-26
	old bethpage, New York, United States	2012-02-26
	benton, Arkansas, United States	2012-02-26
	Roswell, New Mexico, United States	2012-02-26
	High Falls, New York, United States	2012-02-26
	Valley Stream, New York, United States	2012-02-26
	Anderson, California, United States	2012-02-26
	Seattle, Washington, United States	2012-02-26

Name	Location	Date
[redacted]	Eatonville, Washington, United States	2012-02-26
	West Tremont, Maine, United States	2012-02-26
	Warrenton, Oregon, United States	2012-02-26
	Bethel Park, Pennsylvania, United States	2012-02-26
	Cincinnati, Ohio, United States	2012-02-26
	Phoenix, Arizona, United States	2012-02-26
	Fircrest, Washington, United States	2012-02-26
	Fort Worth, Texas, United States	2012-02-26
	Willow, New York, United States	2012-02-26
	Bridgewater, New Jersey, United States	2012-02-26
	nsw, Idaho, United States	2012-02-26
	Ann Arbor, Michigan, United States	2012-02-26
	Chicago, Illinois, United States	2012-02-26
	Kapaa, Hawaii, United States	2012-02-26
	Fall River,, Massachusetts, United States	2012-02-26
	Tujunga, California, United States	2012-02-26
	nsw, Idaho, United States	2012-02-26
	nsw, Idaho, United States	2012-02-26
	Findlay, Ohio, United States	2012-02-26
	Cardiff, California, United States	2012-02-26
	san francisco, California, United States	2012-02-26
	Westminster, Colorado, United States	2012-02-26
	Old Hickory, Tennessee, United States	2012-02-26
	Carpinteria, California, United States	2012-02-26
	Sedona, Arizona, United States	2012-02-26
	Monte Rio, California, United States	2012-02-26
	Seattle, Washington, United States	2012-02-26
	Orlando, Florida, United States	2012-02-26
	Breitenfurt, Austria	2012-02-26
	Tulsa, Oklahoma, United States	2012-02-26

Name	Location	Date
[redacted]	Las Cruces, New Mexico, United States	2012-02-26
[redacted]	Chicago, Illinois, United States	2012-02-26
[redacted]	Oshawa, Canada	2012-02-26
[redacted]	lawrence, Pennsylvania, United States	2012-02-26
[redacted]	St. Helens, Oregon, United States	2012-02-26
[redacted]	Tucson, Arizona, United States	2012-02-26
[redacted]	Palm Bay, Florida, United States	2012-02-26
[redacted]	Lexington, Kentucky, United States	2012-02-26
[redacted]	Farmington Hills, Michigan, United States	2012-02-26
[redacted]	Cornville, Arizona, United States	2012-02-26
[redacted]	new york, New York, United States	2012-02-26
[redacted]	Phoenix, Arizona, United States	2012-02-26
[redacted]	Lewiston, Maine, United States	2012-02-26
[redacted]	Phoenix, Arizona, United States	2012-02-26
[redacted]	Orange, California, United States	2012-02-26
[redacted]	Matawan, New Jersey, United States	2012-02-26
[redacted]	Riverton, Connecticut, United States	2012-02-26
[redacted]	Los Angeles, United States Minor Outlying Islands	2012-02-26
[redacted]	Aspen, Colorado, United States	2012-02-26
[redacted]	traverse city, Michigan, United States	2012-02-26
[redacted]	Pendleton, New York, United States	2012-02-26
[redacted]	Austin, Minnesota, United States	2012-02-26
[redacted]	Dunedin, Florida, United States	2012-02-26
[redacted]	Sacramento, California, United States	2012-02-26
[redacted]	Poulsbo, Washington, United States	2012-02-26
[redacted]	Jamesburg, New Jersey, United States	2012-02-26
[redacted]	Boston, Massachusetts, United States	2012-02-26
[redacted]	Los Angeles, California, United States	2012-02-26
[redacted]	Bellingham, Washington, United States	2012-02-26

Name	Location	Date
[redacted]	Silver Spring, Maryland, United States	2012-02-26
[redacted]	Cranford, New Jersey, United States	2012-02-26
[redacted]	Jackson, New Jersey, United States	2012-02-26
[redacted]	Rochester, Afghanistan	2012-02-26
[redacted]	Miami, Florida, United States	2012-02-26
[redacted]	Brookeville, Maryland, United States	2012-02-26
[redacted]	Portsmouth, Rhode Island, United States	2012-02-26
[redacted]	Cottage Grove, Minnesota, United States	2012-02-26
[redacted]	Portland, Oregon, United States	2012-02-26
[redacted]	Au/ZH, Alabama, United States	2012-02-26
[redacted]	Henrico, Virginia, United States	2012-02-26
[redacted]	Philadelphia, Pennsylvania, United States	2012-02-26
[redacted]	Winter Park, Florida, United States	2012-02-26
[redacted]	Simpsonville, South Carolina, United States	2012-02-26
[redacted]	High Point, North Carolina, United States	2012-02-26
[redacted]	Port Orchard, Washington, United States	2012-02-26
[redacted]	New York, New York, United States	2012-02-26
[redacted]	Kilauea, Hawaii, United States	2012-02-26
[redacted]	Tucson, Arizona, United States	2012-02-26
[redacted]	Manchester, Missouri, United States	2012-02-26
[redacted]	vancouver, Washington, United States	2012-02-26
[redacted]	St Louis Park, Minnesota, United States	2012-02-26
[redacted]	Delray Beach, Florida, United States	2012-02-26
[redacted]	San Diego, Virgin Islands, U.S.	2012-02-26
[redacted]	Willowick, Ohio, United States	2012-02-26
[redacted]	San Ramon, California, United States	2012-02-26
[redacted]	San Jose, California, United States	2012-02-26
[redacted]	melksham, New York, United States	2012-02-26
[redacted]	Louisville, Colorado, United States	2012-02-26

Name	Location	Date
[redacted]	Oklahoma City, Oklahoma, United States	2012-02-26
[redacted]	Ouray, Colorado, United States	2012-02-26
[redacted]	Englewood, New Jersey, United States	2012-02-26
[redacted]	BORDEAUX FRANCE, Alaska, United States	2012-02-26
[redacted]	Fort Smith, Arkansas, United States	2012-02-26
[redacted]	muskegon, Michigan, United States	2012-02-26
[redacted]	LEBANON, Indiana, United States	2012-02-26
[redacted]	Decatur, Illinois, United States	2012-02-26
[redacted]	Friendswood, Texas, United States	2012-02-26
[redacted]	altamonte springs, Florida, United States	2012-02-26
[redacted]	Dublin, Ireland	2012-02-26
[redacted]	Cooperstown, New York, United States	2012-02-26
[redacted]	New Castle, Pennsylvania, United States	2012-02-26
[redacted]	climax, New York, United States	2012-02-26
[redacted]	Milton, Massachusetts, United States	2012-02-26
[redacted]	Belmont, Massachusetts, United States	2012-02-26
[redacted]	Kraków, Poland	2012-02-26
[redacted]	Keller, Texas, United States	2012-02-26
[redacted]	El Cajon, California, United States	2012-02-26
[redacted]	Glenn Dale, Maryland, United States	2012-02-26
[redacted]	Highland, United States Minor Outlying Islands	2012-02-26
[redacted]	Mosheim, Tennessee, United States	2012-02-26
[redacted]	Rochester, New York, United States	2012-02-26
[redacted]	Canyon Country, California, United States	2012-02-26
[redacted]	Scarborough, New York, United States	2012-02-26
[redacted]	brooklyn, New York, United States	2012-02-26
[redacted]	Sycamore, Illinois, United States	2012-02-26
[redacted]	york, Pennsylvania, United States	2012-02-26

Name	Location	Date
[redacted]	Boynton Beach, Florida, United States	2012-02-26
[redacted]	Pensacola, Florida, United States	2012-02-26
[redacted]	Granada Hills, California, United States	2012-02-26
[redacted]	San Rafael, California, United States	2012-02-26
[redacted]	Ingleside, Illinois, United States	2012-02-26
[redacted]	Freeport, Florida, United States	2012-02-26
[redacted]	Besançon, New York, United States	2012-02-26
[redacted]	Milton, Pennsylvania, United States	2012-02-26
[redacted]	rochester, New York, United States	2012-02-26
[redacted]	Aguadilla, Puerto Rico, United States	2012-02-26
[redacted]	Cloverdale, California, United States	2012-02-26
[redacted]	Port Orford, Oregon, United States	2012-02-26
[redacted]	Canton, Georgia, United States	2012-02-26
[redacted]	Warsaw, Poland	2012-02-26
[redacted]	La Follette, Tennessee, United States	2012-02-26
[redacted]	Neptune, New Jersey, United States	2012-02-26
[redacted]	Gladstone, Oregon, United States	2012-02-26
[redacted]	Highland Village, Texas, United States	2012-02-26
[redacted]	Denfield, California, United States	2012-02-26
[redacted]	Portland, Oregon, United States	2012-02-26
[redacted]	Watervliet, New York, United States	2012-02-26
[redacted]	Wichita, Kansas, United States	2012-02-26
[redacted]	Nashville, Tennessee, United States	2012-02-26
[redacted]	Jamaica Plain, Massachusetts, United States	2012-02-26
[redacted]	St.Paul, Minnesota, United States	2012-02-26
[redacted]	Kempfeld, Delaware, United States	2012-02-26
[redacted]	Weston, Connecticut, United States	2012-02-26
[redacted]	ft. lauderdale, Florida, United States	2012-02-26
[redacted]	terlingua, Texas, United States	2012-02-26

Name		Location	Date
[redacted]		Minneapoilis, Minnesota, United States	2012-02-26
[redacted]		Denver, Colorado, United States	2012-02-26
[redacted]		Ashland, Oregon, United States	2012-02-26
[redacted]		Houston, Texas, United States	2012-02-26
[redacted]		Wilmington, Ohio, United States	2012-02-26
[redacted]		Long Beach, New York, United States	2012-02-26
[redacted]		woodacre, California, United States	2012-02-26
[redacted]		San Francisco, California, United States	2012-02-26
[redacted]		quimperlé, France	2012-02-26
[redacted]		Aguilar, Colorado, United States	2012-02-26
[redacted]		Augusta, Georgia, United States	2012-02-26
[redacted]		Mill Valley, California, United States	2012-02-26
[redacted]		Eureka, California, United States	2012-02-26
[redacted]		Middlesex, New Jersey, United States	2012-02-26
[redacted]		Vancouver, Canada	2012-02-26
[redacted]		Plant City, Florida, United States	2012-02-26
[redacted]		Concord, California, United States	2012-02-26
[redacted]		San Diego, California, United States	2012-02-26
[redacted]		Spicewood, Texas, United States	2012-02-26
[redacted]		Twisp, Washington, United States	2012-02-26
[redacted]		El Prado, New Mexico, United States	2012-02-26
[redacted]		Lewes, Delaware, United States	2012-02-26
[redacted]		Cypress, California, United States	2012-02-26
[redacted]		Austin, Texas, United States	2012-02-26
[redacted]		Bethesda, Ohio, United States	2012-02-26
[redacted]		Tucson, Arizona, United States	2012-02-26
[redacted]		Portland, Oregon, United States	2012-02-26
[redacted]		Albany, Oregon, United States	2012-02-26
[redacted]		Royal Palm Beach, Florida, United States	2012-02-26
[redacted]		Boulder, Colorado, United States	2012-02-26

Name	Location	Date
[redacted]	Eugene, Oregon, United States	2012-02-26
	Bakerfield, California, United States	2012-02-26
	Ellicott City, Maryland, United States	2012-02-26
	boulder creek, California, United States	2012-02-26
	Stillwater, Oklahoma, United States	2012-02-26
	staten island, New York, United States	2012-02-26
	e, Ohio, United States	2012-02-26
	phoenix, Arizona, United States	2012-02-26
	Lantier, Florida, United States	2012-02-26
	zumbrota, Minnesota, United States	2012-02-26
	Sarasota, Florida, United States	2012-02-26
	Philadelphia, Pennsylvania, United States	2012-02-26
	Akron, Ohio, United States	2012-02-26
	Las Vegas, Nevada, United States	2012-02-26
	Moreland Hills, Ohio, United States	2012-02-26
	Kalamazoo, Michigan, United States	2012-02-26
	Campbell, California, United States	2012-02-26
	Woodland Park, Colorado, United States	2012-02-26
	Pompton Lakes, New Jersey, United States	2012-02-26
	Newark, Delaware, United States	2012-02-26
	Chicago, Illinois, United States	2012-02-26
	Montfort, Wisconsin, United States	2012-02-26
	st.james city, Florida, United States	2012-02-26
	Desert Hot Springs, California, United States	2012-02-26
	Decatur, Illinois, United States	2012-02-26
	Windsor, Oregon, United States	2012-02-26
	SF, California, United States	2012-02-26
	Chelsea, Massachusetts, United States	2012-02-26
	bentonville, Arkansas, United States	2012-02-26

Name	Location	Date
[redacted]	Brooklyn, New York, United States	2012-02-26
[redacted]	Mechanicsville, Virginia, United States	2012-02-26
[redacted]	Eden Prairie, Minnesota, United States	2012-02-26
[redacted]	San Jose, California, United States	2012-02-26
[redacted]	Murfreesboro, Tennessee, United States	2012-02-26
[redacted]	Stayner, Puerto Rico, United States	2012-02-26
[redacted]	penfield, Germany	2012-02-26
[redacted]	Rowayton, Connecticut, United States	2012-02-26
[redacted]	Austin, Texas, United States	2012-02-26
[redacted]	Beaverton, Oregon, United States	2012-02-26
[redacted]	Vienna, Ohio, United States	2012-02-26
[redacted]	Springville, Tennessee, United States	2012-02-26
[redacted]	New York, New York, United States	2012-02-26
[redacted]	West Townsend, Massachusetts, United States	2012-02-26
[redacted]	San Jose, California, United States	2012-02-26
[redacted]	Sullivan, Maine, United States	2012-02-26
[redacted]	Corrigan, Texas, United States	2012-02-26
[redacted]	Bronx, New York, United States	2012-02-26
[redacted]	Orange Park, Florida, United States	2012-02-26
[redacted]	Salt Lake Cty, Utah, United States	2012-02-26
[redacted]	Medford, Oregon, United States	2012-02-26
[redacted]	Baltimore, Maryland, United States	2012-02-26
[redacted]	Maastricht, Netherlands	2012-02-26
[redacted]	San Francisco, California, United States	2012-02-26
[redacted]	Victoria, Canada	2012-02-26
[redacted]	Austin, Texas, United States	2012-02-26
[redacted]	W. Hollywood, California, United States	2012-02-26
[redacted]	San Mateo, California, United States	2012-02-26
[redacted]	Hillsborough, New Jersey, United States	2012-02-27

Name	Location	Date
[redacted]	Pittsburgh, Pennsylvania, United States	2012-02-27
[redacted]	Boulder, Colorado, United States	2012-02-27
[redacted]	Pearl River, New York, United States	2012-02-27
[redacted]	Sacramento, California, United States	2012-02-27
[redacted]	Williamstown, New York, United States	2012-02-27
[redacted]	dublin, District Of Columbia, United States	2012-02-27
[redacted]	Dallas, Texas, United States	2012-02-27
[redacted]	Tecate, California, United States	2012-02-27
[redacted]	oberlin, Ohio, United States	2012-02-27
[redacted]	Phoenix, Arizona, United States	2012-02-27
[redacted]	Indianapolis, Indiana, United States	2012-02-27
[redacted]	Hancock, New York, United States	2012-02-27
[redacted]	Lawrence, Kansas, United States	2012-02-27
[redacted]	Boise, Idaho, United States	2012-02-27
[redacted]	santa fe, New Mexico, United States	2012-02-27
[redacted]	Granite Bay, California, United States	2012-02-27
[redacted]	El Cerrito, California, United States	2012-02-27
[redacted]	Harrisburg, Pennsylvania, United States	2012-02-27
[redacted]	Gillette, New Jersey, United States	2012-02-27
[redacted]	Seattle, Washington, United States	2012-02-27
[redacted]	san anselmo, California, United States	2012-02-27
[redacted]	eNGLISHTOWN, New Jersey, United States	2012-02-27
[redacted]	Portland, Oregon, United States	2012-02-27
[redacted]	Belmont, Massachusetts, United States	2012-02-27
[redacted]	Rosalie, Nebraska, United States	2012-02-27
[redacted]	Henderson, Nevada, United States	2012-02-27
[redacted]	Asheville, North Carolina, United States	2012-02-27
[redacted]	North Kansas City, Missouri, United States	2012-02-27
[redacted]	Minneapolis, Minnesota, United States	2012-02-27

Name		Location	Date
[redacted]		NY, New York, United States	2012-02-27
[redacted]		san antonio, Texas, United States	2012-02-27
[redacted]		Roslyn Heights, New York, United States	2012-02-27
[redacted]		-, Texas, United States	2012-02-27
[redacted]		Elizabethton, Tennessee, United States	2012-02-27
[redacted]		Minneapolis, Minnesota, United States	2012-02-27
[redacted]		Bradenton, Florida, United States	2012-02-27
[redacted]		Ludlow, Kentucky, United States	2012-02-27
[redacted]		Solon, Ohio, United States	2012-02-27
[redacted]		Tiffin, Ohio, United States	2012-02-27
[redacted]		stone mountain, Georgia, United States	2012-02-27
[redacted]		Bellingham, Washington, United States	2012-02-27
[redacted]		Lansdale, Pennsylvania, United States	2012-02-27
[redacted]		Bronx, New York, United States	2012-02-27
[redacted]		Santiago, South Carolina, United States	2012-02-27
[redacted]		Distrito Federal, Mexico	2012-02-27
[redacted]		Coaldale, Colorado, United States	2012-02-27
[redacted]		Brookings, Oregon, United States	2012-02-27
[redacted]		Schenectady, New York, United States	2012-02-27
[redacted]		Boca Raton, Florida, United States	2012-02-27
[redacted]		little rock, Arkansas, United States	2012-02-27
[redacted]		Spicewood, Texas, United States	2012-02-27
[redacted]		Knoxville, Tennessee, United States	2012-02-27
[redacted]		blasdell, New York, United States	2012-02-27
[redacted]		Bethesda, Maryland, United States	2012-02-27
[redacted]		covington, Louisiana, United States	2012-02-27
[redacted]		Salkum, Washington, United States	2012-02-27
[redacted]		Chicago, Illinois, United States	2012-02-27
[redacted]		Uvalde, Texas, United States	2012-02-27
[redacted]		Jacksonville, Florida, United States	2012-02-27

Name	Location	Date
[redacted]	Novi, Michigan, United States	2012-02-27
[redacted]	Peruibe, Brazil	2012-02-27
[redacted]	Vacaville, California, United States	2012-02-27
[redacted]	London Ont. Canada, N5y4k5, California, United States	2012-02-27
[redacted]	Maldegem, Armed Forces Pacific, United States	2012-02-27
[redacted]	West Haverstraw, New York, United States	2012-02-27
[redacted]	Portland, Oregon, United States	2012-02-27
[redacted]	orange, California, United States	2012-02-27
[redacted]	Highland, Illinois, United States	2012-02-27
[redacted]	Sherwood, Arkansas, United States	2012-02-27
[redacted]	Cary, North Carolina, United States	2012-02-27
[redacted]	Newington, Connecticut, United States	2012-02-27
[redacted]	Newark, Delaware, United States	2012-02-27
[redacted]	Edinboro, Pennsylvania, United States	2012-02-27
[redacted]	Washington, District Of Columbia, United States	2012-02-27
[redacted]	Modesto, California, United States	2012-02-27
[redacted]	Centreville, Virginia, United States	2012-02-27
[redacted]	Mokena, Illinois, United States	2012-02-27
[redacted]	Bretnwood, New Hampshire, United States	2012-02-27
[redacted]	Saint Louis, Missouri, United States	2012-02-27
[redacted]	Chapel Hill, North Carolina, United States	2012-02-27
[redacted]	Toronto, New York, United States	2012-02-27
[redacted]	Aurora, Colorado, United States	2012-02-27
[redacted]	Troutdale, Oregon, United States	2012-02-27
[redacted]	Portland, Oregon, United States	2012-02-27
[redacted]	Hayward, California, United States	2012-02-27
[redacted]	New Oxford, Pennsylvania, United States	2012-02-27

Name		Location	Date
[redacted]		Lexington, Kentucky, United States	2012-02-27
		Woodside, New York, United States	2012-02-27
		Santa Rosa, California, United States	2012-02-27
		L.A., Colombia	2012-02-27
		Wittmann, Arizona, United States	2012-02-27
		springfield, Illinois, United States	2012-02-27
		Houston, Texas, United States	2012-02-27
		Oxford, Florida, United States	2012-02-27
		Oak Lawn, Illinois, United States	2012-02-27
		Florissant, Missouri, United States	2012-02-27
		El Dorado, Arkansas, United States	2012-02-27
		Pleasant Garden, North Carolina, United States	2012-02-27
		Redwood City, Australia	2012-02-27
		Palm Springs, California, United States	2012-02-27
		Phila. , Pennsylvania, United States	2012-02-27
		St. Paul, Minnesota, United States	2012-02-27
		Carlton, Oregon, United States	2012-02-27
		Bradenton, Florida, United States	2012-02-27
		denver, Colorado, United States	2012-02-27
		barling, Arkansas, United States	2012-02-27
		Chico, California, United States	2012-02-27
		Edinburg, Texas, United States	2012-02-27
		Flushing, New York, United States	2012-02-27
		Gretna, Louisiana, United States	2012-02-27
		Ft. Collins, Colorado, United States	2012-02-27
		ALTON, Illinois, United States	2012-02-27
		Hesperia, California, United States	2012-02-27
		Medford, Oregon, United States	2012-02-27
		Wenatchee, Washington, United States	2012-02-27

Name	Location	Date
[redacted]	West Milford, New Jersey, United States	2012-02-27
[redacted]	Philadelphia, Pennsylvania, United States	2012-02-27
[redacted]	Glen Rock, New Jersey, United States	2012-02-27
[redacted]	Doylestown, Pennsylvania, United States	2012-02-27
[redacted]	Mashpee, Massachusetts, United States	2012-02-27
[redacted]	Oshkosh, Wisconsin, United States	2012-02-27
[redacted]	Lewiston, New York, United States	2012-02-27
[redacted]	Seattle, Washington, United States	2012-02-27
[redacted]	Gillett, Wisconsin, United States	2012-02-27
[redacted]	bllngs, Montana, United States	2012-02-27
[redacted]	Elmira, New York, United States	2012-02-27
[redacted]	Las Vegas, Nevada, United States	2012-02-27
[redacted]	westminster, California, United States	2012-02-27
[redacted]	NEW YORK, New York, United States	2012-02-27
[redacted]	Vancouver, California, United States	2012-02-27
[redacted]	Calgary, California, United States	2012-02-27
[redacted]	Portland, Oregon, United States	2012-02-27
[redacted]	Detroit, Michigan, United States	2012-02-27
[redacted]	San Antonio, Texas, United States	2012-02-27
[redacted]	Rockport, Washington, United States	2012-02-27
[redacted]	San Marcos, Texas, United States	2012-02-27
[redacted]	winchester, Massachusetts, United States	2012-02-27
[redacted]	morro bay, California, United States	2012-02-27
[redacted]	Winnipeg, Canada	2012-02-27
[redacted]	Issaquah, Washington, United States	2012-02-27
[redacted]	Tucson, Arizona, United States	2012-02-27
[redacted]	San Rafael, California, United States	2012-02-27
[redacted]	Sioux Falls, South Dakota, United States	2012-02-27
[redacted]	St. Cloud, Minnesota, United States	2012-02-27
[redacted]	San Anselmo, California, United States	2012-02-27

Name		Location	Date
[redacted]		Pescadero, California, United States	2012-02-27
		Pollock Pines, California, United States	2012-02-27
		Kenmore, Washington, United States	2012-02-27
		Leicester, United Kingdom	2012-02-27
		TACOMA, Washington, United States	2012-02-27
		Chelan, Washington, United States	2012-02-27
		Muskegon, Michigan, United States	2012-02-27
		Tacoma, Washington, United States	2012-02-27
		Sacramento, California, United States	2012-02-27
		Malvern, Pennsylvania, United States	2012-02-27
		Cockeysville, Maryland, United States	2012-02-27
		Chennai, Tennessee, United States	2012-02-27
		Livingston, Texas, United States	2012-02-27
		Wilmington, Delaware, United States	2012-02-27
		Moscow, Rhode Island, United States	2012-02-27
		Sherman Oaks, California, United States	2012-02-27
		Harrison, Arkansas, United States	2012-02-27
		Drl Rey Oaks, California, United States	2012-02-27
		San Mateo, California, United States	2012-02-27
		Pasay, Philippines	2012-02-27
		Granger, Indiana, United States	2012-02-27
		Bertamirans, Ames, A Coruña, Armed Forces Pacific, United States	2012-02-27
		Austin, Texas, United States	2012-02-27
		Nandlstadt, Delaware, United States	2012-02-27
		Fremont, California, United States	2012-02-27
		Pensacola, Florida, United States	2012-02-27
		Santa Fe, New Mexico, United States	2012-02-27
		Downers Grove, Illinois, United States	2012-02-27
		Glendale, California, United States	2012-02-27

Name	Location	Date
[redacted]	Karachi, Pakistan	2012-02-27
	Sacrofano, Virgin Islands, United States	2012-02-27
	durban, South Africa	2012-02-27
	Thonon les bains, Arizona, United States	2012-02-27
	Solna, Sweden	2012-02-27
	Greenville, South Carolina, United States	2012-02-27
	piraeus, Greece	2012-02-27
	Springfield, Missouri, United States	2012-02-27
	Ventura, California, United States	2012-02-27
	Durban North, Kentucky, United States	2012-02-27
	Wexford, Pennsylvania, United States	2012-02-27
	salerno, Illinois, United States	2012-02-27
	Wrocław, Poland	2012-02-27
	Hilo, Hawaii, United States	2012-02-27
	braga, Indiana, United States	2012-02-27
	Villa Park, Illinois, United States	2012-02-27
	Bremerton, Washington, United States	2012-02-27
	PITTSBURGH, Pennsylvania, United States	2012-02-27
	Grantham, New Hampshire, United States	2012-02-27
	Salem, Oregon, United States	2012-02-27
	houlton, Maine, United States	2012-02-27
	Humacao, Puerto Rico, United States	2012-02-27
	no. ferrisburgh, Vermont, United States	2012-02-27
	Basel, Switzerland	2012-02-27
	Deep River, Connecticut, United States	2012-02-27
	Great Yarmouth, United Kingdom	2012-02-27
	Sintra, Portugal	2012-02-27
	Evergreen, Colorado, United States	2012-02-27
	Brier Hill, New York, United States	2012-02-27
	Naples, Florida, United States	2012-02-27

Name	Location	Date
[redacted]	Boise, Idaho, United States	2012-02-27
[redacted]	Chatham, New York, United States	2012-02-27
[redacted]	Waterford Works, New Jersey, United States	2012-02-27
[redacted]	new york, New York, United States	2012-02-27
[redacted]	Burdett, New York, United States	2012-02-27
[redacted]	Orlando, Florida, United States	2012-02-27
[redacted]	austin, Texas, United States	2012-02-27
[redacted]	Clinton, Iowa, United States	2012-02-27
[redacted]	Stafford, Virginia, United States	2012-02-27
[redacted]	Longmont, Colorado, United States	2012-02-27
[redacted]	Jenkintown, Pennsylvania, United States	2012-02-27
[redacted]	Staten Island, New York, United States	2012-02-27
[redacted]	Allentown, Pennsylvania, United States	2012-02-27
[redacted]	Flushing, New York, United States	2012-02-27
[redacted]	Fredonia, New York, United States	2012-02-27
[redacted]	Dawson, Iowa, United States	2012-02-27
[redacted]	vico canavese, New York, United States	2012-02-27
[redacted]	Springfield, Ohio, United States	2012-02-27
[redacted]	Columbia, South Carolina, United States	2012-02-27
[redacted]	Clifton Park, New York, United States	2012-02-27
[redacted]	bennington, Vermont, United States	2012-02-27
[redacted]	Winchester, Virginia, United States	2012-02-27
[redacted]	New Brunswick, New Jersey, United States	2012-02-27
[redacted]	Granby, Massachusetts, United States	2012-02-27
[redacted]	New Brunswick, New Jersey, United States	2012-02-27
[redacted]	Williston, Vermont, United States	2012-02-27
[redacted]	McKeesport, Pennsylvania, United States	2012-02-27
[redacted]	Hamilton Square, New Jersey, United States	2012-02-27

Name	Location	Date
[redacted]	St. Louis, Missouri, United States	2012-02-27
	Hackettstown, New Jersey, United States	2012-02-27
	Hackensack, New Jersey, United States	2012-02-27
	Lake Park, Florida, United States	2012-02-27
	Phoenix, Arizona, United States	2012-02-27
	Houston, Texas, United States	2012-02-27
	Myrtle Creek, Oregon, United States	2012-02-27
	Wheaton, Illinois, United States	2012-02-27
	west haven, Connecticut, United States	2012-02-27
	New York, New York, United States	2012-02-27
	jacksonville, Alabama, United States	2012-02-27
	Milwaukee, Wisconsin, United States	2012-02-27
	Larsen, Wisconsin, United States	2012-02-27
	Georgetown, Indiana, United States	2012-02-27
	so. milwaukee, Wisconsin, United States	2012-02-27
	Roma, Italy	2012-02-27
	Rochester Hills, Michigan, United States	2012-02-27
	summerville, South Carolina, United States	2012-02-27
	high bridge, New Jersey, United States	2012-02-27
	lowell, Massachusetts, United States	2012-02-27
	Corpus Christi, Texas, United States	2012-02-27
	Florida, Massachusetts, United States	2012-02-27
	Murrieta, California, United States	2012-02-27
	Louisville, Kentucky, United States	2012-02-27
	casper, Wyoming, United States	2012-02-27
	New Delhi, India, India	2012-02-27
	New York, New York, United States	2012-02-27
	Keyport, New Jersey, United States	2012-02-27

Name	Location	Date
[redacted]	Berkeley, United States Minor Outlying Islands	2012-02-27
[redacted]	Lexington, Kentucky, United States	2012-02-27
[redacted]	Cambridge, New York, United States	2012-02-27
[redacted]	East Dundee, Illinois, United States	2012-02-27
[redacted]	flemington, New Jersey, United States	2012-02-27
[redacted]	Garden City, Kansas, United States	2012-02-27
[redacted]	Sarasota, Florida, United States	2012-02-27
[redacted]	Ojai, California, United States	2012-02-27
[redacted]	Seattle, Washington, United States	2012-02-27
[redacted]	Burien, Washington, United States	2012-02-27
[redacted]	Valencia, Spain	2012-02-27
[redacted]	Jersey City, New Jersey, United States	2012-02-27
[redacted]	Arlington, Virginia, United States	2012-02-27
[redacted]	San Diego, California, United States	2012-02-27
[redacted]	Chicago, Illinois, United States	2012-02-27
[redacted]	Videbæk, Delaware, United States	2012-02-27
[redacted]	Stuart, Florida, United States	2012-02-27
[redacted]	HILTONHEAD, South Carolina, United States	2012-02-27
[redacted]	Los Angeles, California, United States	2012-02-27
[redacted]	Winnipeg, MB., Canada	2012-02-27
[redacted]	New York, New York, United States	2012-02-27
[redacted]	El Portal, Florida, United States	2012-02-27
[redacted]	Astoria, Oregon, United States	2012-02-27
[redacted]	Alhambra, California, United States	2012-02-27
[redacted]	hunt. sta., New York, United States	2012-02-27
[redacted]	Miami, Florida, United States	2012-02-27
[redacted]	New London, Connecticut, United States	2012-02-27
[redacted]	Cambridge, Massachusetts, United States	2012-02-27
[redacted]	Fords, New Jersey, United States	2012-02-27

Name	Location	Date
[redacted]	Onbekend, Belgium	2012-02-27
	Larwill, Indiana, United States	2012-02-27
	Beach Park, Illinois, United States	2012-02-27
	Brentwood, Tennessee, United States	2012-02-27
	Albany, New York, United States	2012-02-27
	Seattle, Washington, United States	2012-02-27
	Hightstown, New Jersey, United States	2012-02-27
	Santa Rosa, California, United States	2012-02-27
	Evans, Georgia, United States	2012-02-27
	Binghamton, New York, United States	2012-02-27
	Gelsenkirchen, Germany	2012-02-27
	San Diego, California, United States	2012-02-27
	Richboro, Pennsylvania, United States	2012-02-27
	n, Illinois, United States	2012-02-27
	Claremont, California, United States	2012-02-27
	Sierra Vista, Arizona, United States	2012-02-27
	ithaca, New York, United States	2012-02-27
	aix en provence, Alabama, United States	2012-02-27
	Sierra Vista, Arizona, United States	2012-02-27
	Sarasota, Florida, United States	2012-02-27
	Mt Olive, Alabama, United States	2012-02-27
	Scottsdale, Arizona, United States	2012-02-27
	Monroeville, New Jersey, United States	2012-02-27
	Island Pk, New York, United States	2012-02-27
	Kalamazoo, Michigan, United States	2012-02-27
	Brookline, Massachusetts, United States	2012-02-27
	San Diego, California, United States	2012-02-27
	Lincoln, California, United States	2012-02-27
	Berea, Kentucky, United States	2012-02-27
	Cheboygan, Michigan, United States	2012-02-27

Name	Location	Date
[redacted]	hasselt, Belgium	2012-02-27
[redacted]	Waynesburg, Pennsylvania, United States	2012-02-27
[redacted]	Buffalo, New York, United States	2012-02-27
[redacted]	Beckum, Delaware, United States	2012-02-27
[redacted]	Winnetka, Illinois, United States	2012-02-27
[redacted]	Chicago, Illinois, United States	2012-02-28
[redacted]	Phoenix, Arizona, United States	2012-02-28
[redacted]	Watervliet, New York, United States	2012-02-28
[redacted]	LAS VEGAS, Nevada, United States	2012-02-28
[redacted]	Tobyhanna, Pennsylvania, United States	2012-02-28
[redacted]	Webster Groves (Saint Louis), Missouri, United States	2012-02-28
[redacted]	Ceres, California, United States	2012-02-28
[redacted]	Charlottesville, Virginia, United States	2012-02-28
[redacted]	stony point, New York, United States	2012-02-28
[redacted]	Overland Park, Kansas, United States	2012-02-28
[redacted]	Newark, Delaware, United States	2012-02-28
[redacted]	Catania, Italy	2012-02-28
[redacted]	palermo, Italy	2012-02-28
[redacted]	Florissant, Missouri, United States	2012-02-28
[redacted]	Bolivar, Missouri, United States	2012-02-28
[redacted]	Havre, Montana, United States	2012-02-28
[redacted]	Cleveland, Ohio, United States	2012-02-28
[redacted]	Portland, Oregon, United States	2012-02-28
[redacted]	Coquitlam, New York, United States	2012-02-28
[redacted]	SCOTTSDALE, Arizona, United States	2012-02-28
[redacted]	Grass Valley, California, United States	2012-02-28
[redacted]	Nederland, Colorado, United States	2012-02-28
[redacted]	Chula Vista, California, United States	2012-02-28
[redacted]	Plainfield, New Jersey, United States	2012-02-28

Name	Location	Date
[redacted]	Overland Park, Kansas, United States	2012-02-28
[redacted]	Horton, Alabama, United States	2012-02-28
[redacted]	portland, Oregon, United States	2012-02-28
[redacted]	Poland, Indiana, United States	2012-02-28
[redacted]	escondido, California, United States	2012-02-28
[redacted]	Normal, Illinois, United States	2012-02-28
[redacted]	Allison Park, Pennsylvania, United States	2012-02-28
[redacted]	beaver falls, Pennsylvania, United States	2012-02-28
[redacted]	Pomona, California, United States	2012-02-28
[redacted]	Narberth, Pennsylvania, United States	2012-02-28
[redacted]	Sandpoint, Idaho, United States	2012-02-28
[redacted]	Portland, Oregon, United States	2012-02-28
[redacted]	Tucson, Arizona, United States	2012-02-28
[redacted]	Baldwin Park, California, United States	2012-02-28
[redacted]	Ericeira, California, United States	2012-02-28
[redacted]	Chattanooga, Tennessee, United States	2012-02-28
[redacted]	New Rochelle, New York, United States	2012-02-28
[redacted]	bradenton, Florida, United States	2012-02-28
[redacted]	Cape Canaveral, Florida, United States	2012-02-28
[redacted]	Ponte Vedra Beach, Florida, United States	2012-02-28
[redacted]	New Brunswick , New Jersey, United States	2012-02-28
[redacted]	Bergenfield, New Jersey, United States	2012-02-28
[redacted]	Moorestown, New Jersey, United States	2012-02-28
[redacted]	Middlesex, New Jersey, United States	2012-02-28
[redacted]	Berkeley Hts, New Jersey, United States	2012-02-28
[redacted]	Lodi, New Jersey, United States	2012-02-28
[redacted]	Pine Brook, New Jersey, United States	2012-02-28
[redacted]	Madison, New Jersey, United States	2012-02-28
[redacted]	Paulsboro, New Jersey, United States	2012-02-28

Name	Location	Date
[redacted]	hewitt, New Jersey, United States	2012-02-28
	Barnegat, New Jersey, United States	2012-02-28
	Roselle, New Jersey, United States	2012-02-28
	Jackson, New Jersey, United States	2012-02-28
	Yardville, New Jersey, United States	2012-02-28
	Mount Laurel, New Jersey, United States	2012-02-28
	Westfield, New Jersey, United States	2012-02-28
	Clifton, New Jersey, United States	2012-02-28
	Madison, New Jersey, United States	2012-02-28
	Plainfield, New Jersey, United States	2012-02-28
	Sterling Heights, Michigan, United States	2012-02-28
	West Milford, New Jersey, United States	2012-02-28
	East Brunswick, New Jersey, United States	2012-02-28
	Kenilworth, New Jersey, United States	2012-02-28
	seattle, Washington, United States	2012-02-28
	Takoma Park, Maryland, United States	2012-02-28
	Tenafly, New Jersey, United States	2012-02-28
	Cranford, New Jersey, United States	2012-02-28
	Blackwood, New Jersey, United States	2012-02-28
	miami, Florida, United States	2012-02-28
	Rutherford, New Jersey, United States	2012-02-28
	Mt. Arlington, New Jersey, United States	2012-02-28
	Higjland Park, New Jersey, United States	2012-02-28
	Woodcliff Lake, New Jersey, United States	2012-02-28
	Roselle Park, New Jersey, United States	2012-02-28
	Chevy Chase, Maryland, United States	2012-02-28
	Ringwood, New Jersey, United States	2012-02-28
	Long Branch, New Jersey, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	Rancho Viejo, Texas, United States	2012-02-28

Name	Location	Date
[redacted]	Jersey City, New Jersey, United States	2012-02-28
	Westfield, New Jersey, United States	2012-02-28
	Metuchen, New Jersey, United States	2012-02-28
	morganville, New Jersey, United States	2012-02-28
	Metuchen, New Jersey, United States	2012-02-28
	Hilo, Hawaii, United States	2012-02-28
	new york, New York, United States	2012-02-28
	East Brunswick, New Jersey, United States	2012-02-28
	Louisville, Kentucky, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	RAMSEY, New Jersey, United States	2012-02-28
	Ringwood, New Jersey, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	edison, New Jersey, United States	2012-02-28
	edison, New Jersey, United States	2012-02-28
	Upper Saddle River, New Jersey, United States	2012-02-28
	Metuchen, New Jersey, United States	2012-02-28
	New Brunswick, New Jersey, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	Ringwood, New Jersey, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	New Brunswick, New Jersey, United States	2012-02-28
	New Brunswick, New Jersey, United States	2012-02-28
	Metuchen, New Jersey, United States	2012-02-28
	metuchen NJ, New Jersey, United States	2012-02-28
	Newark, New Jersey, United States	2012-02-28
	Highland Park, New Jersey, United States	2012-02-28

Name	Location	Date
[redacted]	Asbury Park, New Jersey, United States	2012-02-28
	Newton, New Jersey, United States	2012-02-28
	Somerset, New Jersey, United States	2012-02-28
	edison, New Jersey, United States	2012-02-28
	new brunswick, New Jersey, United States	2012-02-28
	TOWNSHIP OF WASHINGTON, New Jersey, United States	2012-02-28
	Metuchen , New Jersey, United States	2012-02-28
	Medford, New Jersey, United States	2012-02-28
	Colonia, New Jersey, United States	2012-02-28
	Riverside, New Jersey, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	Forked River, New Jersey, United States	2012-02-28
	Ringwood, New Jersey, United States	2012-02-28
	Hamilton, New Jersey, United States	2012-02-28
	New Brunswick, New Jersey, United States	2012-02-28
	Flemington, New Jersey, United States	2012-02-28
	Sarasota, Florida, United States	2012-02-28
	hamilton, New Jersey, United States	2012-02-28
	Metuchen, New Jersey, United States	2012-02-28
	Bradley Beach, New Jersey, United States	2012-02-28
	Fort Collins, Colorado, United States	2012-02-28
	Constanta, Romania	2012-02-28
	Monmouth Junction, New Jersey, United States	2012-02-28
	West New York, New Jersey, United States	2012-02-28
	Hewitt, New Jersey, United States	2012-02-28
	Carteret, New Jersey, United States	2012-02-28
	Upper Montclair, New Jersey, United States	2012-02-28

Name	Location	Date
[redacted]	Fords, New Jersey, United States	2012-02-28
	South Plainfield, New Jersey, United States	2012-02-28
	Suffern, New York, United States	2012-02-28
	metuchen, New Jersey, United States	2012-02-28
	cincinnati, Ohio, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	thunder bay, Armed Forces Pacific, United States	2012-02-28
	San Francisco, California, United States	2012-02-28
	Somerset, New Jersey, United States	2012-02-28
	Las Vegas, Nevada, United States	2012-02-28
	Dunellen, New Jersey, United States	2012-02-28
	Hewitt, New Jersey, United States	2012-02-28
	Hamilton, New Jersey, United States	2012-02-28
	Trieste, Iowa, United States	2012-02-28
	Ulm, Delaware, United States	2012-02-28
	Union, Kentucky, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	MEXICO, Armed Forces Pacific, United States	2012-02-28
	Charlotte, North Carolina, United States	2012-02-28
	tenafly, New Jersey, United States	2012-02-28
	Riverton, New Jersey, United States	2012-02-28
	Naples, Florida, United States	2012-02-28
	Piscataway, New Jersey, United States	2012-02-28
	New York, New York, United States	2012-02-28
	Stuart, Florida, United States	2012-02-28
	Maplewood, New Jersey, United States	2012-02-28
	New Haven, Connecticut, United States	2012-02-28
	Madison, Wisconsin, United States	2012-02-28

Name	Location	Date
[redacted]	Allentown, Pennsylvania, United States	2012-02-28
	Boalsburg, Pennsylvania, United States	2012-02-28
	Reseda, California, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	somerset, New Jersey, United States	2012-02-28
	South Park, Pennsylvania, United States	2012-02-28
	Rancho Palos Verdes, California, United States	2012-02-28
	Hillsboro, Oregon, United States	2012-02-28
	Atlanta, Georgia, United States	2012-02-28
	Richboro, Pennsylvania, United States	2012-02-28
	Paradise, Michigan, United States	2012-02-28
	New Brunswick, New Jersey, United States	2012-02-28
	sf, California, United States	2012-02-28
	iselin, New Jersey, United States	2012-02-28
	Iowa City, Iowa, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	Saint Louis, Missouri, United States	2012-02-28
	New York, New York, United States	2012-02-28
	Monmouth Junction, New Jersey, United States	2012-02-28
	Raritan, New Jersey, United States	2012-02-28
	Santa Fe, New Mexico, United States	2012-02-28
	Westfield, New Jersey, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	East Rutherford, New Jersey, United States	2012-02-28
	princeton, New Jersey, United States	2012-02-28
	Guelph, Ontario, Canada, Ohio, United States	2012-02-28
	Oakland, California, United States	2012-02-28

Name	Location	Date
[redacted]	Talent, Oregon, United States	2012-02-28
	Montclair, New Jersey, United States	2012-02-28
	Ogdensburg, New York, United States	2012-02-28
	Chicago, Illinois, United States	2012-02-28
	Edison, New Jersey, United States	2012-02-28
	Linden, New Jersey, United States	2012-02-28
	Teaneck, New Jersey, United States	2012-02-28
	New Brunswick, New Jersey, United States	2012-02-28
	Old Bridge, New Jersey, United States	2012-02-28
	Ojai , California, United States	2012-02-28
	Dover, New Jersey, United States	2012-02-29
	Butler, New Jersey, United States	2012-02-29
	Knoxville, Tennessee, United States	2012-02-29
	Somerset, New Jersey, United States	2012-02-29
	Roma, Italy	2012-02-29
	Cresskill, New Jersey, United States	2012-02-29
	New York, New York, United States	2012-02-29
	Edison, New Jersey, United States	2012-02-29
	Madison, New Jersey, United States	2012-02-29
	Mahwah, New Jersey, United States	2012-02-29
	Long Valley, New Jersey, United States	2012-02-29
	Saratoga, California, United States	2012-02-29
	new brunswick, New Jersey, United States	2012-02-29
	Hillsborough, New Jersey, United States	2012-02-29
	Fullerton, California, United States	2012-02-29
	Bloomington, Minnesota, United States	2012-02-29
	Oakland, California, United States	2012-02-29
	New Milford, New Jersey, United States	2012-02-29
	Jersey City, New Jersey, United States	2012-02-29

Name	Location	Date
[redacted]	Point Pleasant, New Jersey, United States	2012-02-29
[redacted]	San Francisco, California, United States	2012-02-29
[redacted]	Piscataway, New Jersey, United States	2012-02-29
[redacted]	Metuchen, New Jersey, United States	2012-02-29
[redacted]	huntington, New York, United States	2012-02-29
[redacted]	Princeton, New Jersey, United States	2012-02-29
[redacted]	Costa Mesa, California, United States	2012-02-29
[redacted]	Winston, Georgia, United States	2012-02-29
[redacted]	phoenix, Arizona, United States	2012-02-29
[redacted]	Brooklyn, United States Minor Outlying Islands	2012-02-29
[redacted]	Madeira Beach, Florida, United States	2012-02-29
[redacted]	Ringwood, New Jersey, United States	2012-02-29
[redacted]	Cliffside Park, New Jersey, United States	2012-02-29
[redacted]	Pompton Plains, New Jersey, United States	2012-02-29
[redacted]	East Hampton, New York, United States	2012-02-29
[redacted]	Milltown, New Jersey, United States	2012-02-29
[redacted]	Oulu, Finland	2012-02-29
[redacted]	Kansas City, Missouri, United States	2012-02-29
[redacted]	Basking Ridge, New Jersey, United States	2012-02-29
[redacted]	Oxford, Ohio, United States	2012-02-29
[redacted]	S Plainfield, New Jersey, United States	2012-02-29
[redacted]	Ithaca, New York, United States	2012-02-29
[redacted]	Milltown, New Jersey, United States	2012-02-29
[redacted]	Erie, Pennsylvania, United States	2012-02-29
[redacted]	Gresham, Oregon, United States	2012-02-29
[redacted]	Philadelphia, Pennsylvania, United States	2012-02-29
[redacted]	Union, New Jersey, United States	2012-02-29
[redacted]	Piscataway, New Jersey, United States	2012-02-29
[redacted]	Ocean Springs, Mississippi, United States	2012-02-29

Name	Location	Date
[redacted]	Piscataway, New Jersey, United States	2012-02-29
	Glenwood, New Jersey, United States	2012-02-29
	Colonia, New Jersey, United States	2012-02-29
	Amsterdam, Netherlands	2012-02-29
	Morris Plains, New Jersey, United States	2012-02-29
	Berkeley Heights, New Jersey, United States	2012-02-29
	sparta, New Jersey, United States	2012-02-29
	Brighon, Massachusetts, United States	2012-02-29
	Westminster, California, United States	2012-02-29
	ringwood, New Jersey, United States	2012-02-29
	milan, Virginia, United States	2012-02-29
	Chesapeake, Virginia, United States	2012-02-29
	Ringwood, New Jersey, United States	2012-02-29
	Metuchen, New Jersey, United States	2012-02-29
	Piscataway, New Jersey, United States	2012-02-29
	Pulaski, Virginia, United States	2012-02-29
	Edison, New Jersey, United States	2012-02-29
	Belvidere, Illinois, United States	2012-02-29
	New York, New York, United States	2012-02-29
	Manville, New Jersey, United States	2012-02-29
	Cygnet, Ohio, United States	2012-02-29
	santa monica, Virgin Islands, U.S.	2012-02-29
	new brunswick, New Jersey, United States	2012-02-29
	barneveld, New York, United States	2012-02-29
	Kimberly, Alabama, United States	2012-02-29
	South River, New Jersey, United States	2012-02-29
	colonia, New Jersey, United States	2012-02-29
	pawtucket, Rhode Island, United States	2012-02-29
	Stuart, Florida, United States	2012-02-29

Name	Location	Date
[redacted]	farnborough, United Kingdom	2012-02-29
[redacted]	Edison, New Jersey, United States	2012-02-29
[redacted]	Edison, New Jersey, United States	2012-02-29
[redacted]	Bloomfield, New Jersey, United States	2012-02-29
[redacted]	baker, Oregon, United States	2012-02-29
[redacted]	Brooklyn, New York, United States	2012-02-29
[redacted]	Vienna, Austria	2012-02-29
[redacted]	Steuben, Maine, United States	2012-02-29
[redacted]	Monmouth Junction, New Jersey, United States	2012-02-29
[redacted]	Justice, Illinois, United States	2012-02-29
[redacted]	dayton, New Jersey, United States	2012-02-29
[redacted]	Parlin, New Jersey, United States	2012-02-29
[redacted]	Santa Cruz, California, United States	2012-02-29
[redacted]	lancaster, California, United States	2012-02-29
[redacted]	Garfield Hts. Ohio, Alabama, United States	2012-02-29
[redacted]	Sonoma, California, United States	2012-02-29
[redacted]	Raamsdonksveer, Netherlands	2012-02-29
[redacted]	Mahwah, New Jersey, United States	2012-02-29
[redacted]	Lewisville, Texas, United States	2012-02-29
[redacted]	Brooklyn, New York, United States	2012-02-29
[redacted]	ilford, Armed Forces Europe, Canada, Africa, or Middle East, United States	2012-02-29
[redacted]	jacksonville, Florida, United States	2012-02-29
[redacted]	Edison, New Jersey, United States	2012-02-29
[redacted]	Lady Lake, Florida, United States	2012-02-29
[redacted]	Edison, New Jersey, United States	2012-02-29
[redacted]	Nelson, New Hampshire, United States	2012-02-29
[redacted]	Santa Barbara, California, United States	2012-02-29
[redacted]	Kettering, Ohio, United States	2012-02-29

Name	Location	Date
[redacted]	Franklin, Tennessee, United States	2012-02-29
	San Jose, California, United States	2012-02-29
	Piscataway, New Jersey, United States	2012-02-29
	Union, New Jersey, United States	2012-02-29
	grosse pointe, Michigan, United States	2012-02-29
	Warren, Ohio, United States	2012-02-29
	Leander, Texas, United States	2012-02-29
	Fort Bragg, California, United States	2012-02-29
	Jamestown, New York, United States	2012-02-29
	San Juan, Puerto Rico, United States	2012-02-29
	Fort Madison, Iowa, United States	2012-02-29
	New York, New York, United States	2012-02-29
	Madison, Wisconsin, United States	2012-02-29
	High Pt., North Carolina, United States	2012-02-29
	Rancho Mirage, California, United States	2012-02-29
	GARDEN CITY, Kansas, United States	2012-02-29
	clidton, New Jersey, United States	2012-02-29
	Roseland, New Jersey, United States	2012-02-29
	Durham, North Carolina, United States	2012-02-29
	Foley, Alabama, United States	2012-02-29
	Crestone, Colorado, United States	2012-02-29
	Mine Hill, New Jersey, United States	2012-02-29
	west haven, Connecticut, United States	2012-02-29
	Los Angeles, California, United States	2012-02-29
	NY, New York, United States	2012-02-29
	Rosemont, Pennsylvania, United States	2012-02-29
	New York, New York, United States	2012-02-29
	Williamsville, New York, United States	2012-02-29
	Groton, Connecticut, United States	2012-02-29
	San Antonio, Texas, United States	2012-02-29

Name	Location	Date
[redacted]	New Brighton, Minnesota, United States	2012-02-29
[redacted]	brooklyn, New York, United States	2012-02-29
[redacted]	Albuquerque, New Mexico, United States	2012-02-29
[redacted]	Beaverton, Oregon, United States	2012-02-29
[redacted]	Prescott Valley, Arizona, United States	2012-02-29
[redacted]	Knoxville, Tennessee, United States	2012-02-29
[redacted]	rogersville, Tennessee, United States	2012-02-29
[redacted]	Lakewood ranch, Florida, United States	2012-02-29
[redacted]	Nashua, New Hampshire, United States	2012-02-29
[redacted]	paradise, Michigan, United States	2012-02-29
[redacted]	New Brunswick, New Jersey, United States	2012-02-29
[redacted]	Louisville, Kentucky, United States	2012-02-29
[redacted]	Milano, Italy	2012-02-29
[redacted]	Scottsdale, Arizona, United States	2012-02-29
[redacted]	Portland, Oregon, United States	2012-02-29
[redacted]	Edison, New Jersey, United States	2012-02-29
[redacted]	Middlesex, New Jersey, United States	2012-02-29
[redacted]	Riverside, Illinois, United States	2012-02-29
[redacted]	syracuse, New York, United States	2012-02-29
[redacted]	san jose, California, United States	2012-02-29
[redacted]	Tucson, Arizona, United States	2012-02-29
[redacted]	Riverside, California, United States	2012-02-29
[redacted]	Valley Glen, California, United States	2012-02-29
[redacted]	Mendon, Massachusetts, United States	2012-02-29
[redacted]	WELLS, Maine, United States	2012-02-29
[redacted]	Clifton, New Jersey, United States	2012-02-29
[redacted]	Hempstead, New York, United States	2012-02-29
[redacted]	Chandler, Arizona, United States	2012-02-29
[redacted]	Aurora, Colorado, United States	2012-03-01

Name	Location	Date
[redacted]	New Providence, New Jersey, United States	2012-03-01
[redacted]	Milwaukee, Wisconsin, United States	2012-03-01
[redacted]	Englewood, Tennessee, United States	2012-03-01
[redacted]	Vimodrone, Italy	2012-03-01
[redacted]	Brooklyn, Ohio, United States	2012-03-01
[redacted]	Goshen, Connecticut, United States	2012-03-01
[redacted]	rockville, Maryland, United States	2012-03-01
[redacted]	Chippewa Falls, Wisconsin, United States	2012-03-01
[redacted]	waikoloa, Hawaii, United States	2012-03-01
[redacted]	Reno, Nevada, United States	2012-03-01
[redacted]	Elk Grove, California, United States	2012-03-01
[redacted]	Edison, New Jersey, United States	2012-03-01
[redacted]	GREEDFIELD, Wisconsin, United States	2012-03-01
[redacted]	Carson City, Nevada, United States	2012-03-01
[redacted]	la selva beach, California, United States	2012-03-01
[redacted]	Thousand Oaks, California, United States	2012-03-01
[redacted]	Brentwood, California, United States	2012-03-01
[redacted]	wheat ridge, Colorado, United States	2012-03-01
[redacted]	TULSA, Oklahoma, United States	2012-03-01
[redacted]	Philadelphia, Pennsylvania, United States	2012-03-01
[redacted]	WEST SACRAMENTO, California, United States	2012-03-01
[redacted]	Louisville, Colorado, United States	2012-03-01
[redacted]	Ashland, Oregon, United States	2012-03-01
[redacted]	Frederick, Maryland, United States	2012-03-01
[redacted]	Slidell, Louisiana, United States	2012-03-01
[redacted]	Colorado Springs, Colorado, United States	2012-03-01
[redacted]	Lake Havasu City, Arizona, United States	2012-03-01
[redacted]	Brooklyn, New York, United States	2012-03-01

Name	Location	Date
[redacted]	Bethune, South Carolina, United States	2012-03-01
[redacted]	Bridgewater, New Jersey, United States	2012-03-01
[redacted]	paramus, New Jersey, United States	2012-03-01
[redacted]	Seattle, Washington, United States	2012-03-01
[redacted]	teaneck, New Jersey, United States	2012-03-01
[redacted]	Buda, Texas, United States	2012-03-01
[redacted]	Santa Rosa, California, United States	2012-03-01
[redacted]	Summer Shade, Kentucky, United States	2012-03-01
[redacted]	Bergenfield, New Jersey, United States	2012-03-01
[redacted]	Astoria, Oregon, United States	2012-03-01
[redacted]	pompton lakes, New Jersey, United States	2012-03-01
[redacted]	Santa BArbara, California, United States	2012-03-01
[redacted]	Greensburg, Pennsylvania, United States	2012-03-01
[redacted]	LA, California, United States	2012-03-01
[redacted]	Roma, Texas, United States	2012-03-01
[redacted]	High Bridge, New Jersey, United States	2012-03-01
[redacted]	Southfield, Michigan, United States	2012-03-01
[redacted]	Auckland, New Zealand	2012-03-01
[redacted]	Bergenfield, New Jersey, United States	2012-03-01
[redacted]	Wylie, Texas, United States	2012-03-01
[redacted]	Toms River, New Jersey, United States	2012-03-01
[redacted]	Pompton Lakes, New Jersey, United States	2012-03-01
[redacted]	nanticoke, Pennsylvania, United States	2012-03-01
[redacted]	Neptune, New Jersey, United States	2012-03-01
[redacted]	Oaklyn, New Jersey, United States	2012-03-01
[redacted]	edison, New Jersey, United States	2012-03-01
[redacted]	LENEXA, Kansas, United States	2012-03-01
[redacted]	Humble, Texas, United States	2012-03-01
[redacted]	Comer, Georgia, United States	2012-03-01

Name	Location	Date
[redacted]	glenview, Illinois, United States	2012-03-01
	South Plainfield, New Jersey, United States	2012-03-01
	Long Pond, Pennsylvania, United States	2012-03-01
	EDISON, New Jersey, United States	2012-03-01
	Elk Grove Village, Illinois, United States	2012-03-01
	LAWRENCE, Pennsylvania, United States	2012-03-01
	Green Brook, New Jersey, United States	2012-03-01
	Sun City, California, United States	2012-03-01
	EHT, New Jersey, United States	2012-03-01
	Asheville, North Carolina, United States	2012-03-01
	Verona, New Jersey, United States	2012-03-01
	Kalamazoo, Michigan, United States	2012-03-01
	Grawn, Michigan, United States	2012-03-01
	Minneapolis, Minnesota, United States	2012-03-01
	Albox, New Mexico, United States	2012-03-01
	Salisbury, North Carolina, United States	2012-03-01
	North Huntingdon, Pennsylvania, United States	2012-03-01
	Millsap, Texas, United States	2012-03-01
	Union, New Jersey, United States	2012-03-01
	baghdad, Iraq	2012-03-01
	Vista, California, United States	2012-03-01
	Asbury, New Jersey, United States	2012-03-01
	west palm beach, Florida, United States	2012-03-01
	West Palm Beach, Florida, United States	2012-03-01
	Venice, Florida, United States	2012-03-01
	Budapest, Hawaii, United States	2012-03-01
	West Milford, New Jersey, United States	2012-03-01
	old bridge, New Jersey, United States	2012-03-01
	Woodstock, New York, United States	2012-03-01

Name		Location	Date
[redacted]		Beverly, New Jersey, United States	2012-03-01
[redacted]		mtlauel, New Jersey, United States	2012-03-01
[redacted]		Williamstown, New Jersey, United States	2012-03-01
[redacted]		Cedar Park, Texas, United States	2012-03-01
[redacted]		Bound Brook, New Jersey, United States	2012-03-01
[redacted]		tarxien, Idaho, United States	2012-03-01
[redacted]		Orlando, Florida, United States	2012-03-01
[redacted]		Chicago, Illinois, United States	2012-03-01
[redacted]		San Jose, California, United States	2012-03-01
[redacted]		Bayside Hills, New York, United States	2012-03-01
[redacted]		Mount Laurel, New Jersey, United States	2012-03-01
[redacted]		North Haledon, New Jersey, United States	2012-03-01
[redacted]		Santa Fe, New Mexico, United States	2012-03-01
[redacted]		Albuquerque, New Mexico, United States	2012-03-01
[redacted]		Fords, New Jersey, United States	2012-03-01
[redacted]		Hanford, California, United States	2012-03-02
[redacted]		edison, New Jersey, United States	2012-03-02
[redacted]		Eagan, Minnesota, United States	2012-03-02
[redacted]		Sparta, New Jersey, United States	2012-03-02
[redacted]		Sparta, New Jersey, United States	2012-03-02
[redacted]		Harrisburg, Pennsylvania, United States	2012-03-02
[redacted]		Martinsville, Indiana, United States	2012-03-02
[redacted]		troy, Pennsylvania, United States	2012-03-02
[redacted]		Robbinsville, New Jersey, United States	2012-03-02
[redacted]		Wellington, Florida, United States	2012-03-02
[redacted]		Westfield, New Jersey, United States	2012-03-02
[redacted]		Albany, Oregon, United States	2012-03-02
[redacted]		Blacksburg, Virginia, United States	2012-03-02
[redacted]		mogliano veneto, Georgia, United States	2012-03-02
[redacted]		Aurora, Illinois, United States	2012-03-02

Name	Location	Date
[redacted]	Hillsdale, New Jersey, United States	2012-03-02
[redacted]	LA CELLE SUR MORIN, Florida, United States	2012-03-02
[redacted]	Stone Mountain, Georgia, United States	2012-03-02
[redacted]	Edison, New Jersey, United States	2012-03-02
[redacted]	Bridgewater, New Jersey, United States	2012-03-02
[redacted]	bORSBEEK, Alabama, United States	2012-03-02
[redacted]	Springfield, New Jersey, United States	2012-03-02
[redacted]	New Brunswick, New Jersey, United States	2012-03-02
[redacted]	Montclair, New Jersey, United States	2012-03-02
[redacted]	brick, New Jersey, United States	2012-03-02
[redacted]	Blackwood, New Jersey, United States	2012-03-02
[redacted]	Stuart, Virginia, United States	2012-03-02
[redacted]	Manitou Springs, Colorado, United States	2012-03-02
[redacted]	Potomac Falls, Virginia, United States	2012-03-02
[redacted]	Hawthorne, New Jersey, United States	2012-03-02
[redacted]	Millburn Twp, New Jersey, United States	2012-03-02
[redacted]	Oakland, New Jersey, United States	2012-03-02
[redacted]	West Milford, New Jersey, United States	2012-03-02
[redacted]	Roosevelt, New Jersey, United States	2012-03-02
[redacted]	Highlands , New Jersey, United States	2012-03-02
[redacted]	Ridgewood, New Jersey, United States	2012-03-02
[redacted]	Milford, New Jersey, United States	2012-03-02
[redacted]	Edison, New Jersey, United States	2012-03-02
[redacted]	pompton lakes, New Jersey, United States	2012-03-02
[redacted]	Edison, New Jersey, United States	2012-03-02
[redacted]	Cranford, New Jersey, United States	2012-03-02
[redacted]	Rahway, New Jersey, United States	2012-03-02
[redacted]	Jersey City, New Jersey, United States	2012-03-02

Name	Location	Date
[redacted]	Millville, New Jersey, United States	2012-03-02
[redacted]	pointplesantbeach, New Jersey, United States	2012-03-02
[redacted]	morganville, New Jersey, United States	2012-03-02
[redacted]	Hillsborough, New Jersey, United States	2012-03-02
[redacted]	Edison, New Jersey, United States	2012-03-02
[redacted]	Wayne, New Jersey, United States	2012-03-02
[redacted]	Hawthorne, New Jersey, United States	2012-03-02
[redacted]	Chatham, New Jersey, United States	2012-03-02
[redacted]	Ringwood, New Jersey, United States	2012-03-02
[redacted]	Newton, Massachusetts, United States	2012-03-02
[redacted]	edison, New Jersey, United States	2012-03-02
[redacted]	South Amboy, New Jersey, United States	2012-03-02
[redacted]	Toms River, New Jersey, United States	2012-03-02
[redacted]	Lincoln Park, New Jersey, United States	2012-03-02
[redacted]	Neshanic Station, New Jersey, United States	2012-03-02
[redacted]	Jersey City, New Jersey, United States	2012-03-02
[redacted]	Fort Lee, New Jersey, United States	2012-03-02
[redacted]	westmont, New Jersey, United States	2012-03-02
[redacted]	North Plainfield, New Jersey, United States	2012-03-02
[redacted]	Bergenfield, New Jersey, United States	2012-03-02
[redacted]	Wayne, New Jersey, United States	2012-03-02
[redacted]	Woodland Park, New Jersey, United States	2012-03-02
[redacted]	Jackson, New Jersey, United States	2012-03-02
[redacted]	Rahway, New Jersey, United States	2012-03-02
[redacted]	North Brunswick, New Jersey, United States	2012-03-02
[redacted]	Pompton Lakes, New Jersey, United States	2012-03-02
[redacted]	Milmay, New Jersey, United States	2012-03-02

Name	Location	Date
[redacted]	Newark, New Jersey, United States	2012-03-02
	Bloomingdale, New Jersey, United States	2012-03-02
	kinnelon, New Jersey, United States	2012-03-02
	Maplewood, Afghanistan	2012-03-02
	Fair Lawn, New Jersey, United States	2012-03-02
	Lawrenceville, New Jersey, United States	2012-03-02
	Westfield, New Jersey, United States	2012-03-02
	Jackson, New Jersey, United States	2012-03-02
	Bound Brook, New Jersey, United States	2012-03-02
	Perth Amboy, New Jersey, United States	2012-03-02
	West Long Branch, New Jersey, United States	2012-03-02
	Ringwood, New Jersey, United States	2012-03-02
	salt lake city, Utah, United States	2012-03-02
	Saddle Brook, New Jersey, United States	2012-03-02
	Sewaren, New Jersey, United States	2012-03-02
	APODACA, Texas, United States	2012-03-02
	Newark, New Jersey, United States	2012-03-02
	Edison, New Jersey, United States	2012-03-02
	Wayne, New Jersey, United States	2012-03-02
	New Brunswick; New Jersey, United States	2012-03-02
	Vineland , New Jersey, United States	2012-03-02
	Highland Park, New Jersey, United States	2012-03-02
	Metuchen, New Jersey, United States	2012-03-02
	red bank, New Jersey, United States	2012-03-03
	Glen Gardner, New Jersey, United States	2012-03-03
	Washington, New Jersey, United States	2012-03-03
	Chatham, New Jersey, United States	2012-03-03
	Carteret, New Jersey, United States	2012-03-03

Name	Location	Date
[redacted]	South Plainfield, New Jersey, United States	2012-03-03
[redacted]	Monroe twp, New Jersey, United States	2012-03-03
[redacted]	edison, New Jersey, United States	2012-03-03
[redacted]	Ridgewood, New Jersey, United States	2012-03-03
[redacted]	North Bergen, New Jersey, United States	2012-03-03
[redacted]	Wayne, New Jersey, United States	2012-03-03
[redacted]	North Plainfield, New Jersey, United States	2012-03-03
[redacted]	Bradley Beach, New Jersey, United States	2012-03-03
[redacted]	Cedr Run, New Jersey, United States	2012-03-03
[redacted]	bloomingdale, New Jersey, United States	2012-03-03
[redacted]	Long Beach Township, New Jersey, United States	2012-03-03
[redacted]	Morristown, New Jersey, United States	2012-03-03
[redacted]	Martinsville, New Jersey, United States	2012-03-03
[redacted]	clementon, New Jersey, United States	2012-03-03
[redacted]	Tenafly, New Jersey, United States	2012-03-03
[redacted]	Bound Brook, New Jersey, United States	2012-03-03
[redacted]	Monmouth Jct, New Jersey, United States	2012-03-03
[redacted]	Brick, New Jersey, United States	2012-03-03
[redacted]	Edison, New Jersey, United States	2012-03-03
[redacted]	Hazllet, New Jersey, United States	2012-03-03
[redacted]	El Paso, Texas, United States	2012-03-03
[redacted]	Edison, New Jersey, United States	2012-03-03
[redacted]	East Brunswick, New Jersey, United States	2012-03-03
[redacted]	Edison, New Jersey, United States	2012-03-03
[redacted]	edison, New Jersey, United States	2012-03-03
[redacted]	Wayne, New Jersey, United States	2012-03-03
[redacted]	Red Bank, New Jersey, United States	2012-03-03
[redacted]	Paramus, New Jersey, United States	2012-03-03

Name	Location	Date
[redacted]	Somerset, New Jersey, United States	2012-03-03
[redacted]	Manahawkin, New Jersey, United States	2012-03-03
[redacted]	Berkeley Heights, New Jersey, United States	2012-03-03
[redacted]	Stockholm, New Jersey, United States	2012-03-03
[redacted]	closter, New Jersey, United States	2012-03-03
[redacted]	Wanaque, New Jersey, United States	2012-03-03
[redacted]	EGG HARBOR TOW, New Jersey, United States	2012-03-03
[redacted]	New York, New York, United States	2012-03-03
[redacted]	Gainesville, Florida, United States	2012-03-03
[redacted]	new brunswick, New Jersey, United States	2012-03-03
[redacted]	dumont, New Jersey, United States	2012-03-03
[redacted]	Highland Park, New Jersey, United States	2012-03-03
[redacted]	Lambertville, New Jersey, United States	2012-03-03
[redacted]	North Plainfield, New Jersey, United States	2012-03-03
[redacted]	Chester, New Jersey, United States	2012-03-03
[redacted]	Long Branch, New Jersey, United States	2012-03-03
[redacted]	Gloucester, New Jersey, United States	2012-03-03
[redacted]	East Orange, New Jersey, United States	2012-03-03
[redacted]	Clifton, New Jersey, United States	2012-03-03
[redacted]	Rahway, New Jersey, United States	2012-03-03
[redacted]	edison, New Jersey, United States	2012-03-03
[redacted]	Kihei, Hawaii, United States	2012-03-03
[redacted]	Edison, New Jersey, United States	2012-03-03
[redacted]	Monroe Twp., New Jersey, United States	2012-03-03
[redacted]	Hoboken, New Jersey, United States	2012-03-03
[redacted]	Long Branch, New Jersey, United States	2012-03-03
[redacted]	Manalapan, New Jersey, United States	2012-03-03
[redacted]	Union, New Jersey, United States	2012-03-03

Name	Location	Date
[redacted]	Pompton Lakes, New Jersey, United States	2012-03-03
[redacted]	Oceanport, New Jersey, United States	2012-03-03
[redacted]	Wyckoff, New Jersey, United States	2012-03-03
[redacted]	Marlboro, New Jersey, United States	2012-03-03
[redacted]	Plainfield, New Jersey, United States	2012-03-03
[redacted]	edison, New Jersey, United States	2012-03-03
[redacted]	Norwich, Connecticut, United States	2012-03-03
[redacted]	Manalapan, New Jersey, United States	2012-03-03
[redacted]	Metuchen, New Jersey, United States	2012-03-03
[redacted]	Fair Lawn, New Jersey, United States	2012-03-03
[redacted]	Franklin, New Jersey, United States	2012-03-03
[redacted]	Edison, New Jersey, United States	2012-03-03
[redacted]	Jersey City, New Jersey, United States	2012-03-03
[redacted]	Medford lakes, New Jersey, United States	2012-03-03
[redacted]	iselin, New Jersey, United States	2012-03-03
[redacted]	Edison, New Jersey, United States	2012-03-03
[redacted]	Edison, New Jersey, United States	2012-03-03
[redacted]	Franklin Park, New Jersey, United States	2012-03-03
[redacted]	Phoenix, Arizona, United States	2012-03-03
[redacted]	Metuchen, New Jersey, United States	2012-03-03
[redacted]	Long Branch, New Jersey, United States	2012-03-03
[redacted]	Sea Bright, New Jersey, United States	2012-03-03
[redacted]	waretown, New Jersey, United States	2012-03-03
[redacted]	Nutley, New Jersey, United States	2012-03-03
[redacted]	Landrum, South Carolina, United States	2012-03-03
[redacted]	Brighton, Colorado, United States	2012-03-03
[redacted]	wyckoff, New Jersey, United States	2012-03-03
[redacted]	miami, Florida, United States	2012-03-03
[redacted]	medford lakes, New Jersey, United States	2012-03-03

Name	Location	Date
[redacted]	Glen Gardner, New Jersey, United States	2012-03-03
	Iselin, New Jersey, United States	2012-03-03
	Ewing, New Jersey, United States	2012-03-03
	Butler, New Jersey, United States	2012-03-03
	Edison, New Jersey, United States	2012-03-03
	Brick, New Jersey, United States	2012-03-03
	chatham, New Jersey, United States	2012-03-03
	Brick, New Jersey, United States	2012-03-03
	South Bound Brook, New Jersey, United States	2012-03-03
	South Bound Brook, New Jersey, United States	2012-03-03
	Ocean Grove, New Jersey, United States	2012-03-03
	Edison, New Jersey, United States	2012-03-03
	Morristown, New Jersey, United States	2012-03-03
	Edison, New Jersey, United States	2012-03-03
	Prospect, Kentucky, United States	2012-03-03
	Auckland, New Zealand	2012-03-03
	Sayreville, New Jersey, United States	2012-03-03
	Ringwood, New Jersey, United States	2012-03-03
	North Brunswick, New Jersey, United States	2012-03-03
	Yardley, Pennsylvania, United States	2012-03-03
	Englewood, New Jersey, United States	2012-03-04
	Beacon Falls, Connecticut, United States	2012-03-04
	Bound Brook, New Jersey, United States	2012-03-04
	Morristown, New Jersey, United States	2012-03-04
	Saugus, California, United States	2012-03-04
	Edison, New Jersey, United States	2012-03-04
	El Segundo, California, United States	2012-03-04
	Galveston, Texas, United States	2012-03-04

Name	Location	Date
[redacted]	Edison, New Jersey, United States	2012-03-04
[redacted]	Montgomery, Alabama, United States	2012-03-04
[redacted]	North Brunswick, New Jersey, United States	2012-03-04
[redacted]	Clermont, Florida, United States	2012-03-04
[redacted]	Fulham, Australia	2012-03-04
[redacted]	Kokomo, Indiana, United States	2012-03-04
[redacted]	marlton, New Jersey, United States	2012-03-04
[redacted]	Hillsborough, New Jersey, United States	2012-03-04
[redacted]	campbell hall, New York, United States	2012-03-04
[redacted]	Lake Hopatcong, New Jersey, United States	2012-03-04
[redacted]	Woodbridge, New Jersey, United States	2012-03-04
[redacted]	Ocean Grove, New Jersey, United States	2012-03-04
[redacted]	Gorham, Maine, United States	2012-03-04
[redacted]	Rumson, New York, United States	2012-03-04
[redacted]	stone ridge, New York, United States	2012-03-04
[redacted]	Houston, Texas, United States	2012-03-04
[redacted]	Yuma, Arizona, United States	2012-03-04
[redacted]	Ringwood, New Jersey, United States	2012-03-04
[redacted]	Edison, New Jersey, United States	2012-03-04
[redacted]	Shrewsbury, Massachusetts, United States	2012-03-04
[redacted]	Asheville, North Carolina, United States	2012-03-04
[redacted]	Southlake, Texas, United States	2012-03-04
[redacted]	Shelton, United States Minor Outlying Islands	2012-03-04
[redacted]	beachwood, New Jersey, United States	2012-03-04
[redacted]	Washington, District Of Columbia, United States	2012-03-04
[redacted]	Montreal, Canada	2012-03-04
[redacted]	East Rutherford, New Jersey, United States	2012-03-05

Name	Location	Date
[redacted]	Bergenfield, New Jersey, United States	2012-03-05
[redacted]	Fair Oaks, California, United States	2012-03-05
[redacted]	Folsom, Louisiana, United States	2012-03-05
[redacted]	Flanders, New Jersey, United States	2012-03-05
[redacted]	Chicago, Illinois, United States	2012-03-05
[redacted]	EDISON, New Jersey, United States	2012-03-05
[redacted]	San Jose, California, United States	2012-03-05
[redacted]	Post Falls, Idaho, United States	2012-03-05
[redacted]	Ocala, Florida, United States	2012-03-05
[redacted]	edison, New Jersey, United States	2012-03-05
[redacted]	Edison, New Jersey, United States	2012-03-05
[redacted]	Tampa, Florida, United States	2012-03-05
[redacted]	Middle Island, New York, United States	2012-03-05
[redacted]	Fords, New Jersey, United States	2012-03-05
[redacted]	Hilo, Hawaii, United States	2012-03-05
[redacted]	Indianapolis, Indiana, United States	2012-03-05
[redacted]	Fresno, California, United States	2012-03-05
[redacted]	Grants Pass, Oregon, United States	2012-03-05
[redacted]	Bay Shore, New York, United States	2012-03-05
[redacted]	Los Angeles, California, United States	2012-03-05
[redacted]	Ward Cove, Alaska, United States	2012-03-05
[redacted]	hay el hamadia, Algeria	2012-03-05
[redacted]	Thousand Oaks, California, United States	2012-03-05
[redacted]	Arcata, California, United States	2012-03-05
[redacted]	Zanesville, Ohio, United States	2012-03-05
[redacted]	Frankfort, Kentucky, United States	2012-03-05
[redacted]	Boonton, New Jersey, United States	2012-03-05
[redacted]	Las Vegas, New Mexico, United States	2012-03-05
[redacted]	Ringwood, New Jersey, United States	2012-03-05

Name	Location	Date
[redacted]	edison, New Jersey, United States	2012-03-05
[redacted]	Fords, New Jersey, United States	2012-03-05
[redacted]	New Brunswick, New Jersey, United States	2012-03-05
[redacted]	Aberdeen, New Jersey, United States	2012-03-05
[redacted]	Westerville, Ohio, United States	2012-03-05
[redacted]	Austin, Texas, United States	2012-03-05
[redacted]	Chicago, Illinois, United States	2012-03-05
[redacted]	Louisburg, North Carolina, United States	2012-03-05
[redacted]	Cranbury, New Jersey, United States	2012-03-05
[redacted]	Perth Amboy, New Jersey, United States	2012-03-05
[redacted]	Glen Ridge, New Jersey, United States	2012-03-05
[redacted]	Watsonville, California, United States	2012-03-05
[redacted]	Terre Haute, Indiana, United States	2012-03-05
[redacted]	Julian, California, United States	2012-03-05
[redacted]	Plymouth, Massachusetts, United States	2012-03-05
[redacted]	Vancouver, Washington, United States	2012-03-05
[redacted]	Stellenbosch, South Africa	2012-03-05
[redacted]	Hutto, Texas, United States	2012-03-05
[redacted]	Antioch, California, United States	2012-03-05
[redacted]	Newark, New Jersey, United States	2012-03-05
[redacted]	Tucson, Arizona, United States	2012-03-05
[redacted]	Birch Run, Michigan, United States	2012-03-05
[redacted]	montclair, New Jersey, United States	2012-03-05
[redacted]	New York, New York, United States	2012-03-05
[redacted]	Edison, New Jersey, United States	2012-03-05
[redacted]	Jacksonville, Florida, United States	2012-03-05
[redacted]	Florham Park, New Jersey, United States	2012-03-05
[redacted]	Santa Monica, California, United States	2012-03-05
[redacted]	Elkins Park, Pennsylvania, United States	2012-03-05

Name	Location	Date
[redacted]	Newark, New Jersey, United States	2012-03-05
	Truro, Alabama, United States	2012-03-05
	Dalton, Georgia, United States	2012-03-05
	Lexington, Texas, United States	2012-03-05
	Schenectady, New York, United States	2012-03-05
	Boerne, Texas, United States	2012-03-05
	BANGOR, Maine, United States	2012-03-05
	-----, Florida, United States	2012-03-05
	Sonoma, California, United States	2012-03-05
	Portland, Oregon, United States	2012-03-05
	Easton, Pennsylvania, United States	2012-03-05
	Martinez, California, United States	2012-03-06
	Rockwall, Texas, United States	2012-03-06
	Tallahassee, Florida, United States	2012-03-06
	Kingsville, Texas, United States	2012-03-06
	Brooklyn, New York, United States	2012-03-06
	NY, New York, United States	2012-03-06
	Antioch, Tennessee, United States	2012-03-06
	Thousand Oaks, California, United States	2012-03-06
	Kennett Square, Pennsylvania, United States	2012-03-06
	Scottsdale, Arizona, United States	2012-03-06
	Burlingame, California, United States	2012-03-06
	East Brunswick, New Jersey, United States	2012-03-06
	Denville, New Jersey, United States	2012-03-06
	Weehawken, New Jersey, United States	2012-03-06
	Plano, Texas, United States	2012-03-06
	Orono, Maine, United States	2012-03-06
	Edison, New Jersey, United States	2012-03-06
	Newport News, Virginia, United States	2012-03-06

Name	Location	Date
[redacted]	Fort Lee, New Jersey, United States	2012-03-06
	metuchen, New Jersey, United States	2012-03-06
	Brighton, Colorado, United States	2012-03-06
	El Paso, Texas, United States	2012-03-06
	Brampton, Canada	2012-03-06
	El Cajon, California, United States	2012-03-06
	Stockbridge, Massachusetts, United States	2012-03-06
	Smyrna, Tennessee, United States	2012-03-06
	little rock, Arkansas, United States	2012-03-06
	Skelmersdale, United Kingdom	2012-03-06
	Rebecca, Georgia, United States	2012-03-06
	buffalo, New York, United States	2012-03-06
	Somerset, New Jersey, United States	2012-03-06
	Keansburg, New Jersey, United States	2012-03-06
	Austin, Texas, United States	2012-03-06
	Arlington, Virginia, United States	2012-03-06
	prairie village, Kansas, United States	2012-03-06
	Edison Twp, New Jersey, United States	2012-03-06
	Edison, New Jersey, United States	2012-03-06
	Burton, Michigan, United States	2012-03-06
	Lexington, North Carolina, United States	2012-03-06
	Roanoke, Virginia, United States	2012-03-06
	New City, New York, United States	2012-03-06
	Portsmouth, Virginia, United States	2012-03-06
	Bridgewater, New Jersey, United States	2012-03-06
	Millville, New Jersey, United States	2012-03-06
	Portsmouth, Virginia, United States	2012-03-06
	New Paltz, New York, United States	2012-03-06
	Munhall, Pennsylvania, United States	2012-03-06

Name	Location	Date
[redacted]	Severn, Maryland, United States	2012-03-06
[redacted]	Irving, Texas, United States	2012-03-06
[redacted]	Howell, New Jersey, United States	2012-03-06
[redacted]	Long Valley, New Jersey, United States	2012-03-06
[redacted]	Bound Brook, New Jersey, United States	2012-03-06
[redacted]	Minneapolis, Minnesota, United States	2012-03-06
[redacted]	West Bend, Wisconsin, United States	2012-03-06
[redacted]	new brunswick, New Jersey, United States	2012-03-06
[redacted]	newmarket, Canada	2012-03-06
[redacted]	Tampa, Florida, United States	2012-03-06
[redacted]	hanalei, Hawaii, United States	2012-03-06
[redacted]	Medford, Oregon, United States	2012-03-06
[redacted]	Bellingham, Washington, United States	2012-03-06
[redacted]	LA, California, United States	2012-03-06
[redacted]	Bay City, Michigan, United States	2012-03-06
[redacted]	london, United Kingdom	2012-03-06
[redacted]	Bolton, Massachusetts, United States	2012-03-06
[redacted]	Madison, Wisconsin, United States	2012-03-06
[redacted]	fargo, North Dakota, United States	2012-03-06
[redacted]	Richardson, Texas, United States	2012-03-06
[redacted]	Ferndale, Michigan, United States	2012-03-06
[redacted]	xxxx, New York, United States	2012-03-06
[redacted]	Buffalo, New York, United States	2012-03-06
[redacted]	New York, New York, United States	2012-03-06
[redacted]	Metairie, Louisiana, United States	2012-03-06
[redacted]	Maumee, Ohio, United States	2012-03-06
[redacted]	carneys point, New Jersey, United States	2012-03-06
[redacted]	Hampton, New Jersey, United States	2012-03-06
[redacted]	Minneapolis, Minnesota, United States	2012-03-06

Name		Location	Date
[redacted]		Perth Amboy, New Jersey, United States	2012-03-06
		Richmond, Virginia, United States	2012-03-06
		las vegas, Nevada, United States	2012-03-06
		Mt. Vernon, Texas, United States	2012-03-06
		Ringoes, New Jersey, United States	2012-03-06
		Bentonville, Arkansas, United States	2012-03-06
		Flagler Beach, Florida, United States	2012-03-06
		Shelbyville, Indiana, United States	2012-03-06
		Hempstead, New York, United States	2012-03-06
		Saratoga, Afghanistan	2012-03-07
		Eugene, Oregon, United States	2012-03-07
		SANTA MONICA , California, United States	2012-03-07
		dover, New Hampshire, United States	2012-03-07
		irving, Texas, United States	2012-03-07
		Williamsburg, Virginia, United States	2012-03-07
		Hollister, California, United States	2012-03-07
		Yonkers, New York, United States	2012-03-07
		Burbank, California, United States	2012-03-07
		San Diego, California, United States	2012-03-07
		Riverdale, New Jersey, United States	2012-03-07
		Victoria, Seychelles	2012-03-07
		Summerfield, Florida, United States	2012-03-07
		Wanaque, New Jersey, United States	2012-03-07
		bay city, Michigan, United States	2012-03-07
		Portland, Oregon, United States	2012-03-07
		winchester, Massachusetts, United States	2012-03-07
		alta loma, California, United States	2012-03-07
		Atascadero, California, United States	2012-03-07
		East Northport, New York, United States	2012-03-07

Name	Location	Date
[redacted]	Waxahachie, Texas, United States	2012-03-07
	Aldershot, Australia	2012-03-07
	Rochester, New York, United States	2012-03-07
	Quincy, Massachusetts, United States	2012-03-07
	Long Beach, California, United States	2012-03-07
	Chatham, New Jersey, United States	2012-03-07
	Lund, Sweden	2012-03-07
	San Francisco, California, United States	2012-03-07
	Duluth, Georgia, United States	2012-03-07
	Portland, Oregon, United States	2012-03-07
	Cocoa, Florida, United States	2012-03-07
	South Gate, California, United States	2012-03-07
	geelong, Australia	2012-03-07
	Österåker, Armed Forces Americas (except Canada), United States	2012-03-07
	Arkhangelsk, Russian Federation	2012-03-07
	P, Italy	2012-03-07
	Ojai, California, United States	2012-03-07
	Loxahatchee, Florida, United States	2012-03-07
	Toronto, Canada	2012-03-07
	Newland, North Carolina, United States	2012-03-07
	Somerdale, New Jersey, United States	2012-03-07
	Montgomery, New York, United States	2012-03-07
	Los Lunas, New Mexico, United States	2012-03-07
	west hills, California, United States	2012-03-07
	West Columbia, South Carolina, United States	2012-03-07
	Bound Brook, New Jersey, United States	2012-03-07
	Athens, Ohio, United States	2012-03-07
	Asheville, North Carolina, United States	2012-03-07
	Beltsville, Maryland, United States	2012-03-07

Name	Location	Date
[redacted]	Carmichael, California, United States	2012-03-07
	Bloomington, Indiana, United States	2012-03-07
	Kailua, Hawaii, United States	2012-03-07
	Rosemere, New Jersey, United States	2012-03-07
	athens, California, United States	2012-03-07
	Park City, Utah, United States	2012-03-07
	kalamazoo, Michigan, United States	2012-03-07
	Edison, New Jersey, United States	2012-03-07
	haskell, New Jersey, United States	2012-03-07
	New York, New York, United States	2012-03-07
	Wayne, New Jersey, United States	2012-03-07
	Cincinnati, Ohio, United States	2012-03-07
	LAS VEGAS, Nevada, United States	2012-03-07
	LAS VEGAS, Nevada, United States	2012-03-07
	sf, California, United States	2012-03-07
	Phoenix, Arizona, United States	2012-03-07
	Pascoag, South Carolina, United States	2012-03-07
	arcadia, California, United States	2012-03-07
	north brunswick, New Jersey, United States	2012-03-07
	Miami, Florida, United States	2012-03-07
	Chicago, Illinois, United States	2012-03-07
	Richmond, Virginia, United States	2012-03-07
	Fairhaven, Massachusetts, United States	2012-03-07
	Los Angeles, California, United States	2012-03-07
	Tampere, Finland	2012-03-07
	Metuchen, New Jersey, United States	2012-03-07
	Topeka, Kansas, United States	2012-03-08
	Madison, Wisconsin, United States	2012-03-08
	Hailey, Idaho, United States	2012-03-08

Name	Location	Date
[redacted]	Huntington Beach, California, United States	2012-03-08
[redacted]	winston salem, North Carolina, United States	2012-03-08
[redacted]	Fairfax, California, United States	2012-03-08
[redacted]	clyde, North Carolina, United States	2012-03-08
[redacted]	Raritan, New Jersey, United States	2012-03-08
[redacted]	Balgonie, Canada	2012-03-08
[redacted]	Darby, Pennsylvania, United States	2012-03-08
[redacted]	San Francisco, California, United States	2012-03-08
[redacted]	Murrells Inlet, South Carolina, United States	2012-03-08
[redacted]	Buenos Aires, Arkansas, United States	2012-03-08
[redacted]	Somewhere, Nebraska, United States	2012-03-08
[redacted]	Philadelphia, Pennsylvania, United States	2012-03-08
[redacted]	Lubbock, Texas, United States	2012-03-08
[redacted]	South San Francisco, California, United States	2012-03-08
[redacted]	Washington, New Jersey, United States	2012-03-08
[redacted]	forsyth, Missouri, United States	2012-03-08
[redacted]	Seattle, Washington, United States	2012-03-08
[redacted]	Tampa,, Florida, United States	2012-03-08
[redacted]	Horsham, Pennsylvania, United States	2012-03-08
[redacted]	Eagleville, Pennsylvania, United States	2012-03-08
[redacted]	Dallas, Texas, United States	2012-03-08
[redacted]	Portland, Oregon, United States	2012-03-08
[redacted]	Monroe, Connecticut, United States	2012-03-08
[redacted]	Phoenix, Arizona, United States	2012-03-08
[redacted]	Key LArgo, Florida, United States	2012-03-08
[redacted]	Jacksonville, Florida, United States	2012-03-08
[redacted]	Austin, Texas, United States	2012-03-08
[redacted]	High Point, North Carolina, United States	2012-03-08

Name		Location	Date
[redacted]		Laguna Hills, California, United States	2012-03-08
[redacted]		Bridgewater, New Jersey, United States	2012-03-08
[redacted]		Rochester, New York, United States	2012-03-08
[redacted]		Lees Summit, Missouri, United States	2012-03-08
[redacted]		la palma, California, United States	2012-03-08
[redacted]		Laytonville, California, United States	2012-03-08
[redacted]		LAS VEGAS, Nevada, United States	2012-03-08
[redacted]		Milpitas, California, United States	2012-03-08
[redacted]		Willits, California, United States	2012-03-08
[redacted]		Sun City West, Arizona, United States	2012-03-08
[redacted]		bridgewater, New Jersey, United States	2012-03-08
[redacted]		Three Rivers, Michigan, United States	2012-03-08
[redacted]		Metairie, Louisiana, United States	2012-03-08
[redacted]		winters, California, United States	2012-03-08
[redacted]		Edgewater, Maryland, United States	2012-03-09
[redacted]		moreno valley, California, United States	2012-03-09
[redacted]		Brunswick, Georgia, United States	2012-03-09
[redacted]		Manalapan, New Jersey, United States	2012-03-09
[redacted]		brooklyn, New York, United States	2012-03-09
[redacted]		Los Angeles, California, United States	2012-03-09
[redacted]		Los angeles, California, United States	2012-03-09
[redacted]		Vancouver, Canada	2012-03-09
[redacted]		Terrell, Texas, United States	2012-03-09
[redacted]		Somerset, United Kingdom	2012-03-09
[redacted]		Montgomery, Alabama, United States	2012-03-09
[redacted]		Hinsdale, New Hampshire, United States	2012-03-09
[redacted]		New York, New York, United States	2012-03-09
[redacted]		Herriman, Utah, United States	2012-03-09
[redacted]		Delevan, New York, United States	2012-03-09
[redacted]		towanda, Illinois, United States	2012-03-09

Name	Location	Date
[redacted]	Honokaa, Hawaii, United States	2012-03-09
	Hillsborough, New Jersey, United States	2012-03-09
	Newberry, South Carolina, United States	2012-03-09
	Markham, Canada	2012-03-09
	Joppa, Maryland, United States	2012-03-09
	Mountlake Terrace, Washington, United States	2012-03-09
	Norfolk, Virginia, United States	2012-03-09
	Lynchburg, Virginia, United States	2012-03-09
	Bothell, Washington, United States	2012-03-10
	us, California, United States	2012-03-10
	Reno, Nevada, United States	2012-03-10
	brooklyn center, Minnesota, United States	2012-03-10
	long beach, California, United States	2012-03-10
	Taylorsville, North Carolina, United States	2012-03-10
	aurora, Ohio, United States	2012-03-10
	Schaumburg, Illinois, United States	2012-03-10
	Hastings, Michigan, United States	2012-03-10
	St Joseph, Missouri, United States	2012-03-10
	Portimão, Portugal	2012-03-10
	hamburg, Germany	2012-03-10
	Bridgewater, New Jersey, United States	2012-03-10
	Mason, Wisconsin, United States	2012-03-10
	Brooklyn, New York, United States	2012-03-10
	FORT WORTH, Texas, United States	2012-03-10
	Montgomery Village, Maryland, United States	2012-03-10
	Union City, New Jersey, United States	2012-03-10
	Santa Barbara, California, United States	2012-03-10
	Sahuarita, Arizona, United States	2012-03-10

Name		Location	Date
[redacted]		pgh, United States Minor Outlying Islands	2012-03-10
		Great NEck, New York, United States	2012-03-10
		Webster, New York, United States	2012-03-10
		Battle Creek, Michigan, United States	2012-03-10
		colts neck, New Jersey, United States	2012-03-10
		Concrete, Washington, United States	2012-03-10
		New Orleans, Louisiana, United States	2012-03-10
		ann arbor, Michigan, United States	2012-03-10
		Pgh, Pennsylvania, United States	2012-03-10
		Arlington, Texas, United States	2012-03-10
		North Port, Florida, United States	2012-03-11
		Jersey City, New Jersey, United States	2012-03-11
		Bloomfield,Ont., California, United States	2012-03-11
		Durham, North Carolina, United States	2012-03-11
		Everett, Washington, United States	2012-03-11
		Wilton, Connecticut, United States	2012-03-11
		Liverpool, New York, United States	2012-03-11
		Charlotte, Michigan, United States	2012-03-11
		South Bound Brook, New Jersey, United States	2012-03-11
		NY, New York, United States	2012-03-11
		Concord, California, United States	2012-03-11
		leesburg, Virginia, United States	2012-03-11
		Andhra Pradesh, Indiana, United States	2012-03-11
		Chicago, Illinois, United States	2012-03-11
		Glencoe, Illinois, United States	2012-03-11
		rockland, Massachusetts, United States	2012-03-11
		San Rafael, California, United States	2012-03-11
		New York, New York, United States	2012-03-11
		Bergamo, Italy	2012-03-11

Name	Location	Date
[redacted]	Medford, Oregon, United States	2012-03-11
	Kittery, Maine, United States	2012-03-11
	Santa Cruz, California, United States	2012-03-11
	Athens, Georgia, United States	2012-03-11
	Brooklyn, New York, United States	2012-03-11
	San Diego, California, United States	2012-03-11
	Spokane, Washington, United States	2012-03-11
	Edison, New Jersey, United States	2012-03-11
	Schio (VI), Alabama, United States	2012-03-11
	Banning, California, United States	2012-03-11
	Fairfax, Virginia, United States	2012-03-11
	North Hollywood, California, United States	2012-03-11
	Riga, Latvia	2012-03-12
	Prince Frederick, Maryland, United States	2012-03-12
	Meriden, Connecticut, United States	2012-03-12
	Anaheim, California, United States	2012-03-12
	Phoenix, Arizona, United States	2012-03-12
	Kirkland, Washington, United States	2012-03-12
	Santa Cruz, California, United States	2012-03-12
	new london, Connecticut, United States	2012-03-12
	Yonkers, New York, United States	2012-03-12
	Coon Rapids, Minnesota, United States	2012-03-12
	Vienna, Austria	2012-03-12
	Spotsylvania, Virginia, United States	2012-03-12
	Springfield, Missouri, United States	2012-03-12
	Quispamsis, Canada	2012-03-12
	Carbondale, Colorado, United States	2012-03-12
	Tulsa, Oklahoma, United States	2012-03-12
	Lynn Haven, Florida, United States	2012-03-12

Name		Location	Date
[redacted]		Worcester, Massachusetts, United States	2012-03-12
		Somerset, New Jersey, United States	2012-03-12
		Milltown, New Jersey, United States	2012-03-13
		Vernon, Texas, United States	2012-03-13
		johnstown, Pennsylvania, United States	2012-03-13
		Joplin, Missouri, United States	2012-03-13
		Dalton, Georgia, United States	2012-03-13
		Marina Del Rey, California, United States	2012-03-13
		Kamuela, Hawaii, United States	2012-03-13
		St Petersburg, Florida, United States	2012-03-13
		Houston, Texas, United States	2012-03-13
		marengo, Illinois, United States	2012-03-13
		Enumclaw, Washington, United States	2012-03-13
		Rimini, Italy	2012-03-13
		gauteng, South Africa	2012-03-13
		valencia, Pennsylvania, United States	2012-03-13
		Hayward, Wisconsin, United States	2012-03-13
		Sayville, New York, United States	2012-03-13
		Plymouth, Minnesota, United States	2012-03-13
		Bernex, Switzerland	2012-03-13
		Edmond, Oklahoma, United States	2012-03-13
		Richardson, Texas, United States	2012-03-13
		epping, United Kingdom	2012-03-13
		Bolingbrook, Illinois, United States	2012-03-13
		LAURYS STA, Pennsylvania, United States	2012-03-13
		New York, New York, United States	2012-03-14
		Aurora, Colorado, United States	2012-03-14
		York Haven, Pennsylvania, United States	2012-03-14
		shiprock, New Mexico, United States	2012-03-14
		New York City, Canada	2012-03-14

Name	Location	Date
[redacted]	Aliso Viejo, California, United States	2012-03-14
	St.Charles, Missouri, United States	2012-03-14
	colorado springs, Colorado, United States	2012-03-14
	charlotte, North Carolina, United States	2012-03-14
	New Oxford, Pennsylvania, United States	2012-03-14
	Athens, Georgia, United States	2012-03-14
	Richmond Hill, Georgia, United States	2012-03-14
	Richfield, Minnesota, United States	2012-03-14
	New York City, New York, United States	2012-03-14
	Great Neck, New York, United States	2012-03-14
	New Orleans, Louisiana, United States	2012-03-14
	San Jose, California, United States	2012-03-14
	Manchester, Massachusetts, United States	2012-03-14
	SAN FRAN CISCO, California, United States	2012-03-14
	Pompton Lakes, New Jersey, United States	2012-03-14
	Holden, Massachusetts, United States	2012-03-14
	Worcester, Massachusetts, United States	2012-03-14
	Red Hook, New York, United States	2012-03-14
	Manchester, Massachusetts, United States	2012-03-14
	Mclean, Virginia, United States	2012-03-15
	norfolk, Virginia, United States	2012-03-15
	Essex, Massachusetts, United States	2012-03-15
	Bogotá, Colombia	2012-03-15
	Monticello, Kentucky, United States	2012-03-15
	Ridgewood, New Jersey, United States	2012-03-15
	Groesbeck, Texas, United States	2012-03-15
	CARMICHAEL, California, United States	2012-03-15

Name		Location	Date
[redacted]		barrington, New Hampshire, United States	2012-03-15
[redacted]		sarasota, Florida, United States	2012-03-15
[redacted]		Baltimore, Maryland, United States	2012-03-15
[redacted]		Manchester, Vermont, United States	2012-03-15
[redacted]		Jerusalem, Israel	2012-03-15
[redacted]		New London, Connecticut, United States	2012-03-15
[redacted]		Berkeley, California, United States	2012-03-15
[redacted]		Edison, New Jersey, United States	2012-03-15
[redacted]		Huntsville, Texas, United States	2012-03-15
[redacted]		Bedford, Virginia, United States	2012-03-15
[redacted]		Knightdale, North Carolina, United States	2012-03-15
[redacted]		Manchester, Massachusetts, United States	2012-03-15
[redacted]		manchvegas, Massachusetts, United States	2012-03-15
[redacted]		emmaus, Pennsylvania, United States	2012-03-15
[redacted]		Montevideo, Missouri, United States	2012-03-15
[redacted]		Manchester, Massachusetts, United States	2012-03-15
[redacted]		Beverly, Massachusetts, United States	2012-03-15
[redacted]		manchester, Massachusetts, United States	2012-03-15
[redacted]		Boise, Idaho, United States	2012-03-15
[redacted]		Wallingford, United Kingdom	2012-03-15
[redacted]		Vernon Hills, Illinois, United States	2012-03-15
[redacted]		Beverly, Massachusetts, United States	2012-03-15
[redacted]		winter park, Florida, United States	2012-03-16
[redacted]		Everett, Washington, United States	2012-03-16
[redacted]		manchester, Massachusetts, United States	2012-03-16
[redacted]		Williamsport, Pennsylvania, United States	2012-03-16

Name	Location	Date
[redacted]	Manchester, Massachusetts, United States	2012-03-16
	Rector, Pennsylvania, United States	2012-03-16
	Waco, Texas, United States	2012-03-16
	Zagreb, Croatia	2012-03-16
	ESSEX, United Kingdom	2012-03-16
	Charlotte, North Carolina, United States	2012-03-16
	Huntersville, North Carolina, United States	2012-03-16
	Winston-Salem, North Carolina, United States	2012-03-16
	Shearwater, Canada	2012-03-16
	Toms River, New Jersey, United States	2012-03-16
	Pomona, New Jersey, United States	2012-03-16
	Middleton, Idaho, United States	2012-03-16
	Coral Reef, Florida, United States	2012-03-16
	Hettlingen, Switzerland	2012-03-16
	Redding, California, United States	2012-03-16
	norwich, Connecticut, United States	2012-03-17
	Knoxville, Tennessee, United States	2012-03-17
	Dallas, Texas, United States	2012-03-17
	Foresthill, California, United States	2012-03-17
	Mamou, Louisiana, United States	2012-03-17
	Richmond, California, United States	2012-03-17
	Irvine, California, United States	2012-03-17
	Rockford, Illinois, United States	2012-03-17
	Placitas, New Mexico, United States	2012-03-17
	Montgomery Village, Maryland, United States	2012-03-17
	Los Angeles, California, United States	2012-03-17
	Highland Park, New Jersey, United States	2012-03-17
	Doncaster, United Kingdom	2012-03-17

Name	Location	Date
[redacted]	LOS ANGELES, California, United States	2012-03-17
[redacted]	Palo Alto, California, United States	2012-03-17
[redacted]	ringwood, New Jersey, United States	2012-03-18
[redacted]	homestead, Florida, United States	2012-03-18
[redacted]	Dallas, Texas, United States	2012-03-18
[redacted]	Banks, Alabama, United States	2012-03-18
[redacted]	Mobile, Alabama, United States	2012-03-18
[redacted]	Greenbrier, Tennessee, United States	2012-03-18
[redacted]	Longmont, Colorado, United States	2012-03-18
[redacted]	Newnan, Georgia, United States	2012-03-18
[redacted]	Salt Lake City, Utah, United States	2012-03-18
[redacted]	Clarkston, Washington, United States	2012-03-18
[redacted]	CAYCE, South Carolina, United States	2012-03-18
[redacted]	gaithersburg, Maryland, United States	2012-03-18
[redacted]	Huntsville, Texas, United States	2012-03-18
[redacted]	LaSalle, Illinois, United States	2012-03-18
[redacted]	private, North Carolina, United States	2012-03-18
[redacted]	Scotch Plains, New Jersey, United States	2012-03-18
[redacted]	Medford, New Jersey, United States	2012-03-18
[redacted]	boone, North Carolina, United States	2012-03-18
[redacted]	Aveiro, Portugal	2012-03-18
[redacted]	Egg Harbor City, New Jersey, United States	2012-03-18
[redacted]	Providence, Rhode Island, United States	2012-03-18
[redacted]	Piedmont, California, United States	2012-03-18
[redacted]	Ft. Walton Beach, Florida, United States	2012-03-19
[redacted]	Manchester, Massachusetts, United States	2012-03-19
[redacted]	Brooklyn, New York, United States	2012-03-19
[redacted]	Mahwah, New Jersey, United States	2012-03-19
[redacted]	Atlantic Beach, Florida, United States	2012-03-19

Name	Location	Date
[redacted]	Arcata, California, United States	2012-03-19
[redacted]	Durham, North Carolina, United States	2012-03-19
[redacted]	Oreana, Illinois, United States	2012-03-19
[redacted]	Obrien, Oregon, United States	2012-03-19
[redacted]	port jefferson station, New York, United States	2012-03-19
[redacted]	Tampere, Finland	2012-03-19
[redacted]	bogota, Colombia	2012-03-19
[redacted]	Monroe, Ohio, United States	2012-03-19
[redacted]	Richmond, Virginia, United States	2012-03-19
[redacted]	Cape May, New Jersey, United States	2012-03-19
[redacted]	Brooklyn, New York, United States	2012-03-19
[redacted]	edison, New Jersey, United States	2012-03-19
[redacted]	Congleton, United Kingdom	2012-03-19
[redacted]	SAN DIEGO, California, United States	2012-03-19
[redacted]	tinley park, Illinois, United States	2012-03-19
[redacted]	Chandler, Arizona, United States	2012-03-19
[redacted]	Manassas, Virginia, United States	2012-03-19
[redacted]	San Diego, California, United States	2012-03-19
[redacted]	rochester, New York, United States	2012-03-19
[redacted]	West Richland, Washington, United States	2012-03-19
[redacted]	Chihuahua, Mexico	2012-03-19
[redacted]	Orangevale, California, United States	2012-03-19
[redacted]	Berlin, New York, United States	2012-03-20
[redacted]	Decatur, Georgia, United States	2012-03-20
[redacted]	Williamsport, Pennsylvania, United States	2012-03-20
[redacted]	Naples, Florida, United States	2012-03-20
[redacted]	Biloxi, Mississippi, United States	2012-03-20
[redacted]	New York, New York, United States	2012-03-20
[redacted]	abingdon, Maryland, United States	2012-03-20

Name		Location	Date
[redacted]	[redacted]	Akron, Ohio, United States	2012-03-20
[redacted]	[redacted]	Iowa City, Iowa, United States	2012-03-20
[redacted]	[redacted]	Clarksville, Tennessee, United States	2012-03-20
[redacted]	[redacted]	miami, Florida, United States	2012-03-20
[redacted]	[redacted]	San Francisco, California, United States	2012-03-20
[redacted]	[redacted]	Findlay, Ohio, United States	2012-03-20
[redacted]	[redacted]	Midlothian, Illinois, United States	2012-03-20
[redacted]	[redacted]	Mt Prospect, Illinois, United States	2012-03-20
[redacted]	[redacted]	Weirton, West Virginia, United States	2012-03-20
[redacted]	[redacted]	Villanova, Pennsylvania, United States	2012-03-20
[redacted]	[redacted]	Plano, Texas, United States	2012-03-20
[redacted]	[redacted]	Altamonte Springs, Florida, United States	2012-03-20
[redacted]	[redacted]	Dover, New Jersey, United States	2012-03-20
[redacted]	[redacted]	Wauwatosa, Wisconsin, United States	2012-03-20
[redacted]	[redacted]	bronaugh, Missouri, United States	2012-03-20
[redacted]	[redacted]	boynton beach, Florida, United States	2012-03-20
[redacted]	[redacted]	Waldron, Michigan, United States	2012-03-20
[redacted]	[redacted]	Brooklyn, New York, United States	2012-03-20
[redacted]	[redacted]	greenbrier, Arkansas, United States	2012-03-20
[redacted]	[redacted]	Edison, New Jersey, United States	2012-03-20
[redacted]	[redacted]	Crown Point, Indiana, United States	2012-03-20
[redacted]	[redacted]	Sebastian, Florida, United States	2012-03-20
[redacted]	[redacted]	Haverstraw, New York, United States	2012-03-20
[redacted]	[redacted]	Cheyenne, Wyoming, United States	2012-03-20
[redacted]	[redacted]	Tacoma, Washington, United States	2012-03-20
[redacted]	[redacted]	Garfield, New Jersey, United States	2012-03-20
[redacted]	[redacted]	Woodbridge, Virginia, United States	2012-03-20
[redacted]	[redacted]	Denver, Colorado, United States	2012-03-20
[redacted]	[redacted]	Clarkston, Michigan, United States	2012-03-20
[redacted]	[redacted]	Brooklyn, Ohio, United States	2012-03-20

Name	Location	Date
[redacted]	Rønde, Denmark	2012-03-20
	West Springfield, Massachusetts, United States	2012-03-20
	Valdosta, Georgia, United States	2012-03-20
	Valdosta, Georgia, United States	2012-03-21
	10004, New York, United States	2012-03-21
	Kent, New York, United States	2012-03-21
	Belleville, Michigan, United States	2012-03-21
	East Brunswick, New Jersey, United States	2012-03-21
	Houston, Texas, United States	2012-03-21
	San Diego, California, United States	2012-03-21
	PASSAIC, New Jersey, United States	2012-03-21
	Mobile, Alabama, United States	2012-03-21
	Pinconning, Michigan, United States	2012-03-21
	Charlotte, North Carolina, United States	2012-03-21
	Chicago, Illinois, United States	2012-03-21
	Munster, Indiana, United States	2012-03-21
	Redway, California, United States	2012-03-21
	Farmington Hills, Michigan, United States	2012-03-21
	Mahwah, New Jersey, United States	2012-03-21
	Wadsworth, Ohio, United States	2012-03-21
	Sedalia, Missouri, United States	2012-03-21
	BRIDGEWATER, New Jersey, United States	2012-03-21
	Tuckerton, New Jersey, United States	2012-03-21
	Silver Spring, Maryland, United States	2012-03-21
	philadelphia, Pennsylvania, United States	2012-03-21
	San Antonio, Texas, United States	2012-03-21
	West Lebanon, New Hampshire, United States	2012-03-21
	South plainfielfd, New Jersey, United States	2012-03-21

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Name	Location	Date
[redacted]	Fort Lauderdale, Florida, United States	2012-03-21
	moodus, Connecticut, United States	2012-03-22
	Maumelle, Arkansas, United States	2012-03-22
	Austin, Texas, United States	2012-03-22
	Sherbrooke, Canada	2012-03-22
	Westborough, Massachusetts, United States	2012-03-22
	Belton, Texas, United States	2012-03-22
	norwich, Connecticut, United States	2012-03-22
	Salem, Oregon, United States	2012-03-22
	white lake, Michigan, United States	2012-03-22
	pasco, Washington, United States	2012-03-22
	Rensselaer, New York, United States	2012-03-22
	Orlando, Florida, United States	2012-03-22
	Hanover, New Hampshire, United States	2012-03-22
	San Carlos, California, United States	2012-03-22
	Saginaw, Michigan, United States	2012-03-22
	Los Angeles, California, United States	2012-03-22
	huntington beach, California, United States	2012-03-22
	Prairie Village, Kansas, United States	2012-03-22
	Oceanside, California, United States	2012-03-22
	Nashville, Tennessee, United States	2012-03-22
	Bayville, New Jersey, United States	2012-03-22
	austin, Texas, United States	2012-03-22
	Austin, Texas, United States	2012-03-22
	Branchville, New Jersey, United States	2012-03-22
	Temple, Pennsylvania, United States	2012-03-22
	aguada, Puerto Rico, United States	2012-03-22
	Holly Springs, North Carolina, United States	2012-03-22

Name	Location	Date
[redacted]	Charlotte, North Carolina, United States	2012-03-22
[redacted]	Broolkyn, New York, United States	2012-03-22
[redacted]	fort hood, Texas, United States	2012-03-22
[redacted]	Bridgewater, New Jersey, United States	2012-03-22
[redacted]	oakland, California, United States	2012-03-22
[redacted]	Aventura, Florida, United States	2012-03-22
[redacted]	Somerset, New Jersey, United States	2012-03-22
[redacted]	Bridgewater, New Jersey, United States	2012-03-22
[redacted]	Bridgewater, New Jersey, United States	2012-03-22
[redacted]	Bridgewater, New Jersey, United States	2012-03-22
[redacted]	Chandler, Arizona, United States	2012-03-22
[redacted]	Escondido, California, United States	2012-03-22
[redacted]	Staten Island, New York, United States	2012-03-22
[redacted]	West Palm Beach, Florida, United States	2012-03-23
[redacted]	Athens, Georgia, United States	2012-03-23
[redacted]	Northwood, New Hampshire, United States	2012-03-23
[redacted]	Perth Amboy, New Jersey, United States	2012-03-23
[redacted]	Kajaani, Finland	2012-03-23
[redacted]	Kamloops, Canada	2012-03-23
[redacted]	Everett, Washington, United States	2012-03-23
[redacted]	la Verne, California, United States	2012-03-23
[redacted]	Rodeo, California, United States	2012-03-23
[redacted]	Chicago, Illinois, United States	2012-03-23
[redacted]	New York, New York, United States	2012-03-23
[redacted]	Little Rock, Arkansas, United States	2012-03-23
[redacted]	alvarado, Texas, United States	2012-03-23
[redacted]	Somerset, New Jersey, United States	2012-03-23
[redacted]	Morris Plains, New Jersey, United States	2012-03-23
[redacted]	Fountain, Colorado, United States	2012-03-23

Name	Location	Date
[redacted]	Oakland, California, United States	2012-03-23
	Houston, Texas, United States	2012-03-23
	Manhattan, New York City, New York, United States	2012-03-23
	Matawan, United States Minor Outlying Islands	2012-03-23
	Flemington, New Jersey, United States	2012-03-23
	Oceanside, New York, United States	2012-03-24
	Austin, Texas, United States	2012-03-24
	Grovetown, Georgia, United States	2012-03-24
	Houston, Texas, United States	2012-03-24
	Fort Wayne, Indiana, United States	2012-03-24
	Mankato, Minnesota, United States	2012-03-24
	Broomfield, Colorado, United States	2012-03-24
	Stallikon, Switzerland	2012-03-24
	Los Angeles, California, United States	2012-03-24
	Tampa, Florida, United States	2012-03-24
	Pico, Portugal	2012-03-24
	West Allis, Wisconsin, United States	2012-03-24
	Minneapolis, Minnesota, United States	2012-03-24
	Farmington, Maine, United States	2012-03-24
	Phoenix, Arizona, United States	2012-03-24
	Phoenix, Arizona, United States	2012-03-24
	Martins Ferry, Ohio, United States	2012-03-24
	New Orleans, Louisiana, United States	2012-03-24
	Portland, Oregon, United States	2012-03-24
	Dallas, Texas, United States	2012-03-24
	Lakewood, Colorado, United States	2012-03-24
	Alameda, California, United States	2012-03-25
	Miami, Florida, United States	2012-03-25
	wesley chapel, Florida, United States	2012-03-25

Name	Location	Date
[redacted]	Boulder, CO, United States Minor Outlying Islands	2012-03-25
	Mill Valley, California, United States	2012-03-25
	Kortrijk-Heule West-Vlaanderen Belgie, Nebraska, United States	2012-03-25
	Hawthorne, California, United States	2012-03-25
	Auburn, Pennsylvania, United States	2012-03-25
	sydney, Australia	2012-03-25
	Casper, Wyoming, United States	2012-03-25
	Auburn, Maine, United States	2012-03-25
	Cedar Rapids, Iowa, United States	2012-03-25
	Edison, New Jersey, United States	2012-03-25
	Aberdeen, New Jersey, United States	2012-03-25
	Challenge, California, United States	2012-03-25
	San Marcos, California, United States	2012-03-25
	Derby Line, Vermont, United States	2012-03-25
	Riverview, Florida, United States	2012-03-25
	Glendale, California, United States	2012-03-25
	south daytona, Florida, United States	2012-03-25
	NY, New York, United States	2012-03-25
	Oxford, Mississippi, United States	2012-03-25
	arlington, Texas, United States	2012-03-25
	Tallahassee, Florida, United States	2012-03-25
	Havre, Montana, United States	2012-03-25
	Centerville, Iowa, United States	2012-03-26
	havre de grace, Maryland, United States	2012-03-26
	N. Charleston, South Carolina, United States	2012-03-26
	Tucson, Arizona, United States	2012-03-26
	Denver, Colorado, United States	2012-03-26
	New Buffalo, Michigan, United States	2012-03-26

Name	Location	Date
[redacted]	Islamabad, Pakistan	2012-03-26
[redacted]	Clinton, New Jersey, United States	2012-03-26
[redacted]	Waterbury, Connecticut, United States	2012-03-26
[redacted]	Ladson, South Carolina, United States	2012-03-26
[redacted]	Bothell, Washington, United States	2012-03-26
[redacted]	St. Louis, Missouri, United States	2012-03-26
[redacted]	Lakewood, New Jersey, United States	2012-03-26
[redacted]	Brooklyn, New York, United States	2012-03-26
[redacted]	Sacramento, California, United States	2012-03-27
[redacted]	Indianapolis, Indiana, United States	2012-03-27
[redacted]	cocoa, Florida, United States	2012-03-27
[redacted]	Las Vegas, Nevada, United States	2012-03-27
[redacted]	New Yoek, New York, United States	2012-03-27
[redacted]	Murrysville, Pennsylvania, United States	2012-03-27
[redacted]	Salzgitter, Germany	2012-03-27
[redacted]	Woodstock, Georgia, United States	2012-03-27
[redacted]	arlington, Virginia, United States	2012-03-27
[redacted]	Blackwood, New Jersey, United States	2012-03-27
[redacted]	Cincinnati, Ohio, United States	2012-03-27
[redacted]	Columbus, Ohio, United States	2012-03-27
[redacted]	Grayslake IL, Idaho, United States	2012-03-27
[redacted]	Los Angeles, California, United States	2012-03-27
[redacted]	Austin, Texas, United States	2012-03-27
[redacted]	tonbridge, Arkansas, United States	2012-03-27
[redacted]	Mississauga, Canada	2012-03-27
[redacted]	Dekalb, Illinois, United States	2012-03-27
[redacted]	GLENDALE, Arizona, United States	2012-03-28
[redacted]	Bowie, Maryland, United States	2012-03-28
[redacted]	Bass Coast Shire, Australia	2012-03-28
[redacted]	Burlington, North Carolina, United States	2012-03-28

Name	Location	Date
[redacted]	Nottingham, United Kingdom	2012-03-28
[redacted]	Phila, Pennsylvania, United States	2012-03-28
[redacted]	NRH, Texas, United States	2012-03-28
[redacted]	Rockford, Illinois, United States	2012-03-28
[redacted]	Fair Lawn, New Jersey, United States	2012-03-28
[redacted]	Marco Island, Florida, United States	2012-03-28
[redacted]	brockport, New York, United States	2012-03-28
[redacted]	lemoyne@yahoo.com, Pennsylvania, United States	2012-03-28
[redacted]	toronto, Canada	2012-03-28
[redacted]	olathe, Kansas, United States	2012-03-28
[redacted]	Bay city, Michigan, United States	2012-03-28
[redacted]	Orlando, Florida, United States	2012-03-28
[redacted]	ticonderoga, New York, United States	2012-03-28
[redacted]	Toronto, Canada	2012-03-28
[redacted]	freeland, Washington, United States	2012-03-28
[redacted]	Ormond Beach, Florida, United States	2012-03-28
[redacted]	Richmond, Kentucky, United States	2012-03-29
[redacted]	Madison, Wisconsin, United States	2012-03-29
[redacted]	takoma park, Maryland, United States	2012-03-29
[redacted]	Harrison, Arkansas, United States	2012-03-29
[redacted]	chenango forks, New York, United States	2012-03-29
[redacted]	Bristol, New York, United States	2012-03-29
[redacted]	New Hartford, New York, United States	2012-03-29
[redacted]	platteville, Wisconsin, United States	2012-03-29
[redacted]	crystal river, Florida, United States	2012-03-29
[redacted]	houston, Texas, United States	2012-03-29
[redacted]	Torrington, Connecticut, United States	2012-03-29
[redacted]	houston, Texas, United States	2012-03-29
[redacted]	Lantana, Florida, United States	2012-03-29

Name		Location	Date
[redacted]		KANSAS CITY, Kansas, United States	2012-03-29
[redacted]		Charlotte, North Carolina, United States	2012-03-29
[redacted]		Akron, Ohio, United States	2012-03-29
[redacted]		Brentwood, California, United States	2012-03-29
[redacted]		cape Coral, Florida, United States	2012-03-29
[redacted]		CLIFTON, New Jersey, United States	2012-03-30
[redacted]		Minneapolis, Minnesota, United States	2012-03-30
[redacted]		Tarbert, United Kingdom	2012-03-30
[redacted]		Port Charlotte, Florida, United States	2012-03-30
[redacted]		Verona, New Jersey, United States	2012-03-30
[redacted]		League City, Texas, United States	2012-03-30
[redacted]		Edison, New Jersey, United States	2012-03-30
[redacted]		Edison, New Jersey, United States	2012-03-30
[redacted]		Edison, New Jersey, United States	2012-03-30
[redacted]		Weyauwega, Wisconsin, United States	2012-03-30
[redacted]		Garfield, New Jersey, United States	2012-03-30
[redacted]		Fraser, Michigan, United States	2012-03-30
[redacted]		Box Canyon, California, United States	2012-03-30
[redacted]		Epsom, New Hampshire, United States	2012-03-30
[redacted]		basking ridge, New Jersey, United States	2012-03-30
[redacted]		Holland, Michigan, United States	2012-03-30
[redacted]		Round rock, Texas, United States	2012-03-31
[redacted]		san diego, California, United States	2012-03-31
[redacted]		Norwalk, Ohio, United States	2012-03-31
[redacted]		sherrill, New York, United States	2012-03-31
[redacted]		South Beloit, Illinois, United States	2012-03-31
[redacted]		Pittsburg, Kansas, United States	2012-03-31
[redacted]		Claremont, California, United States	2012-03-31
[redacted]		Claremont, California, United States	2012-03-31
[redacted]		Pikeville, Kentucky, United States	2012-03-31

Name	Location	Date
[redacted]	Fort Collins, Colorado, United States	2012-03-31
	Brooklyn, New York, United States	2012-03-31
	Taunton, United Kingdom	2012-03-31
	bowness on windermer, Wyoming, United States	2012-03-31
	Edinburgh, United Kingdom	2012-03-31
	Wolverhampton, West Virginia, United States	2012-03-31
	Milford, Pennsylvania, United States	2012-03-31
	conway, South Carolina, United States	2012-03-31
	Krum, Texas, United States	2012-03-31
	Winchendon, Massachusetts, United States	2012-03-31
	San Francisco, California, United States	2012-03-31
	Jacksonville, Florida, United States	2012-04-01
	Lanark Highlands, Canada	2012-04-01
	norwich, United Kingdom	2012-04-01
	Merrylands, Australia	2012-04-01
	Northampton, United Kingdom	2012-04-01
	Seattle, Washington, United States	2012-04-01
	Birkdale, Australia	2012-04-01
	LeRoy, Michigan, United States	2012-04-01
	Sanford, Florida, United States	2012-04-01
	Doylestown, Pennsylvania, United States	2012-04-01
	sunnyside, New York, United States	2012-04-01
	Moscow, Idaho, United States	2012-04-01
	Foster City, California, United States	2012-04-01
	Acton, Massachusetts, United States	2012-04-01
	Murrayville, Illinois, United States	2012-04-01
	Bronx, New York, United States	2012-04-01
	Lake Elsinore, California, United States	2012-04-02

Name	Location	Date
[redacted]	jackson, Mississippi, United States	2012-04-02
[redacted]	Sacramento, California, United States	2012-04-02
[redacted]	Edison, New Jersey, United States	2012-04-02
[redacted]	Corpus Christi, Texas, United States	2012-04-02
[redacted]	saskatoon, Canada	2012-04-02
[redacted]	Tucson, Arizona, United States	2012-04-02
[redacted]	Tempe, Arizona, United States	2012-04-02
[redacted]	guilford, Connecticut, United States	2012-04-02
[redacted]	New York, New York, United States	2012-04-02
[redacted]	Warrington, Pennsylvania, United States	2012-04-02
[redacted]	Montclair, New Jersey, United States	2012-04-02
[redacted]	Colorado Springs, Colorado, United States	2012-04-02
[redacted]	Deerfield Beach, Florida, United States	2012-04-02
[redacted]	Danbury, Wisconsin, United States	2012-04-02
[redacted]	San Francisco, California, United States	2012-04-02
[redacted]	El Prado, New Mexico, United States	2012-04-02
[redacted]	Richmond, Virginia, United States	2012-04-02
[redacted]	Lawrence, Kansas, United States	2012-04-02
[redacted]	Fort Myers, Florida, United States	2012-04-02
[redacted]	Huntington Beach, California, United States	2012-04-03
[redacted]	Arkansas City, Kansas, United States	2012-04-03
[redacted]	selkirk, New York, United States	2012-04-03
[redacted]	Highvale, Australia	2012-04-03
[redacted]	brisbane, Australia	2012-04-03
[redacted]	Indialantic, Florida, United States	2012-04-03
[redacted]	Eastbourne, United Kingdom	2012-04-03
[redacted]	Elk Grove Village, Illinois, United States	2012-04-03
[redacted]	Ridgewood, New Jersey, United States	2012-04-03
[redacted]	ALOHA, Oregon, United States	2012-04-03

Name	Location	Date
[redacted]	W.W., Rhode Island, United States	2012-04-03
	Gainesville, Florida, United States	2012-04-03
	Rockport, Maine, United States	2012-04-03
	Tempe, Arizona, United States	2012-04-03
	Golden, Colorado, United States	2012-04-03
	West Columbia, South Carolina, United States	2012-04-03
	Patchuge, New York, United States	2012-04-03
	South Hadley, Massachusetts, United States	2012-04-03
	Chorley, United Kingdom	2012-04-04
	Camden, Tennessee, United States	2012-04-04
	Fort myers, Florida, United States	2012-04-04
	ocala, Florida, United States	2012-04-04
	Murphysboro, Illinois, United States	2012-04-04
	Louisville, Kentucky, United States	2012-04-04
	Albuquerque, New Mexico, United States	2012-04-04
	Fremont, California, United States	2012-04-04
	Wilmington, North Carolina, United States	2012-04-04
	San Diego, California, United States	2012-04-04
	DeLand, Florida, United States	2012-04-04
	hicksville, New York, United States	2012-04-04
	Norristown, Pennsylvania, United States	2012-04-04
	Warburton Victoria Australia, Australia	2012-04-04
	La Verne, California, United States	2012-04-04
	Halifax, Canada	2012-04-04
	waynesville, North Carolina, United States	2012-04-04
	Arlington, Virginia, United States	2012-04-04
	Glen Cove, New York, United States	2012-04-04
	Hartford, Connecticut, United States	2012-04-04

Name		Location	Date
[redacted]		Trabuco Canyon, California, United States	2012-04-04
		Wethersfield, Connecticut, United States	2012-04-04
		Wiliams, Oregon, United States	2012-04-04
		Longview, Washington, United States	2012-04-04
		england, United Kingdom	2012-04-04
		Troutdale, Oregon, United States	2012-04-04
		Clarendon Hills, Illinois, United States	2012-04-04
		Culpeper, Virginia, United States	2012-04-04
		Wixom, Michigan, United States	2012-04-04
		BROOKLYN, New York, United States	2012-04-04
		Benbrook, Texas, United States	2012-04-05
		Nassau, Bahamas	2012-04-05
		Clark, New Jersey, United States	2012-04-05
		Pelham, New Hampshire, United States	2012-04-05
		Ewa Beach, Hawaii, United States	2012-04-05
		Lafayette, Georgia, United States	2012-04-05
		Merrick, New York, United States	2012-04-05
		Mabank, Texas, United States	2012-04-05
		Tulsa, Oklahoma, United States	2012-04-05
		Warner Robins, Georgia, United States	2012-04-05
		Cadmus, Michigan, United States	2012-04-05
		Newport Coast, California, United States	2012-04-05
		Lennestadt, Germany	2012-04-05
		Austin, Texas, United States	2012-04-05
		Banksia Park, Australia	2012-04-05
		Bronx, New York, United States	2012-04-05
		Vellore, India	2012-04-05
		Anchorage, Alaska, United States	2012-04-05
		youngsville, North Carolina, United States	2012-04-05

Name	Location	Date
[redacted]	Chicago, Illinois, United States	2012-04-05
[redacted]	Howell, New Jersey, United States	2012-04-05
[redacted]	Coal Township, Pennsylvania, United States	2012-04-05
[redacted]	Boston, Massachusetts, United States	2012-04-05
[redacted]	West Covina, California, United States	2012-04-06
[redacted]	New Brunswick, New Jersey, United States	2012-04-06
[redacted]	Tinley Pk, Illinois, United States	2012-04-06
[redacted]	Cranston, Rhode Island, United States	2012-04-06
[redacted]	Lawrence, Massachusetts, United States	2012-04-06
[redacted]	Midlothian, Virginia, United States	2012-04-06
[redacted]	mccaysville, Georgia, United States	2012-04-06
[redacted]	OKC, Oklahoma, United States	2012-04-06
[redacted]	Woodbridge, New Jersey, United States	2012-04-06
[redacted]	Portland, Oregon, United States	2012-04-06
[redacted]	New York, New York, United States	2012-04-06
[redacted]	Crowley, Louisiana, United States	2012-04-06
[redacted]	Nicholson, Georgia, United States	2012-04-06
[redacted]	West Yarmouth, Massachusetts, United States	2012-04-06
[redacted]	Evanston, Illinois, United States	2012-04-06
[redacted]	Nahunta, Georgia, United States	2012-04-06
[redacted]	Philadelphia, Pennsylvania, United States	2012-04-06
[redacted]	spokane, Washington, United States	2012-04-06
[redacted]	Hackettstown, New Jersey, United States	2012-04-06
[redacted]	Durham, North Carolina, United States	2012-04-06
[redacted]	Prior Lake, Minnesota, United States	2012-04-07
[redacted]	Santa Rosa, California, United States	2012-04-07
[redacted]	deceptionbay, Australia	2012-04-07
[redacted]	Springfield, Missouri, United States	2012-04-07

Name	Location	Date
[redacted]	Portland, Oregon, United States	2012-04-07
	Prescott, Arizona, United States	2012-04-07
	Dobbs Ferry, New York, United States	2012-04-07
	BLOOMINGDALE, Illinois, United States	2012-04-07
	Antibes, France	2012-04-07
	Canandaigua, New York, United States	2012-04-07
	glendale, New York, United States	2012-04-07
	Edison, New Jersey, United States	2012-04-07
	Menomonee Falls, Wisconsin, United States	2012-04-07
	bedford, Indiana, United States	2012-04-08
	wenig road, Iowa, United States	2012-04-08
	Broomall, Pennsylvania, United States	2012-04-08
	cibolo, Texas, United States	2012-04-08
	Albuquerque, New Mexico, United States	2012-04-08
	North San Juan, California, United States	2012-04-08
	Baroda, Michigan, United States	2012-04-08
	Moorhead, Minnesota, United States	2012-04-08
	Fort Myers, Florida, United States	2012-04-08
	Yorktown, Virginia, United States	2012-04-08
	Garden City, Missouri, United States	2012-04-08
	Lynbrook, New York, United States	2012-04-08
	Minneapolis, Minnesota, United States	2012-04-08
	huntington beach, California, United States	2012-04-08
	San Francisco, California, United States	2012-04-08
	Enumclaw, Washington, United States	2012-04-08
	Brooklyn, New York, United States	2012-04-09
	Martinsburg, West Virginia, United States	2012-04-09
	Rancho Palos Verdes, California, United States	2012-04-09

Name	Location	Date
[redacted]	Warren, Michigan, United States	2012-04-09
	Upton, New York, United States	2012-04-09
	Whitewater, Wisconsin, United States	2012-04-09
	Wyandotte, Michigan, United States	2012-04-09
	Saint-Petersburg, Russian Federation	2012-04-09
	Stockton, California, United States	2012-04-09
	Hammond, Indiana, United States	2012-04-09
	Marietta, Georgia, United States	2012-04-09
	Frederick, Maryland, United States	2012-04-10
	Huntington Beach, California, United States	2012-04-10
	Summerland, California, United States	2012-04-10
	Media, Pennsylvania, United States	2012-04-10
	MESA, Arizona, United States	2012-04-10
	West Harrison, New York, United States	2012-04-10
	Los Angeles, California, United States	2012-04-10
	Solana Beach, California, United States	2012-04-11
	Stockton, California, United States	2012-04-11
	Loveland, Colorado, United States	2012-04-11
	Salisbury, Maryland, United States	2012-04-11
	Tucson, Arizona, United States	2012-04-11
	Portland, Oregon, United States	2012-04-11
	pitts, Georgia, United States	2012-04-11
	Anchorage, Alaska, United States	2012-04-11
	Midland, Texas, United States	2012-04-11
	Niagara Falls, New York, United States	2012-04-11
	Houston, Texas, United States	2012-04-11
	Colonia, New Jersey, United States	2012-04-11
	Houston, Texas, United States	2012-04-11
	spring, Texas, United States	2012-04-11

Name	Location	Date
[redacted]	Valley Springs, California, United States	2012-04-11
[redacted]	New Hope, Minnesota, United States	2012-04-11
[redacted]	Glen Gardner, New Jersey, United States	2012-04-12
[redacted]	lost vaily, Oregon, United States	2012-04-12
[redacted]	Leverett, Massachusetts, United States	2012-04-12
[redacted]	Hendersonville, North Carolina, United States	2012-04-12
[redacted]	wellington, Alabama, United States	2012-04-12
[redacted]	Glendale Hts, Illinois, United States	2012-04-12
[redacted]	Barrington, Illinois, United States	2012-04-12
[redacted]	west palm beach, Florida, United States	2012-04-12
[redacted]	Bridgewater, New Jersey, United States	2012-04-12
[redacted]	Phila, Pennsylvania, United States	2012-04-13
[redacted]	Manchester, Massachusetts, United States	2012-04-13
[redacted]	Winona, Minnesota, United States	2012-04-13
[redacted]	Long Branch, New Jersey, United States	2012-04-13
[redacted]	Denver, Colorado, United States	2012-04-13
[redacted]	Orange Village, Ohio, United States	2012-04-13
[redacted]	Yakima, Washington, United States	2012-04-13
[redacted]	Astoria, New York, United States	2012-04-14
[redacted]	HUNTINGTON, West Virginia, United States	2012-04-14
[redacted]	Valley Springs, California, United States	2012-04-14
[redacted]	Karnataka, India	2012-04-14
[redacted]	mount airy, North Carolina, United States	2012-04-14
[redacted]	Tampa, Florida, United States	2012-04-14
[redacted]	coos bay, Oregon, United States	2012-04-15
[redacted]	Framingham, Massachusetts, United States	2012-04-15
[redacted]	La Habra, California, United States	2012-04-15
[redacted]	San Jose, California, United States	2012-04-15

Name	Location	Date
[redacted]	Mequon, Wisconsin, United States	2012-04-15
	High Point, North Carolina, United States	2012-04-15
	newark, Delaware, United States	2012-04-15
	Middletown, New York, United States	2012-04-15
	Trinidad, Colorado, United States	2012-04-15
	Indianapolis, Indiana, United States	2012-04-15
	Mountain Home, Idaho, United States	2012-04-15
	Columbia, Connecticut, United States	2012-04-16
	mason, Ohio, United States	2012-04-16
	Carmel, Indiana, United States	2012-04-16
	Harrison Township, Michigan, United States	2012-04-16
	Hazel Crest, Illinois, United States	2012-04-16
	Bloomfield Hills, Michigan, United States	2012-04-16
	Marlborough, Massachusetts, United States	2012-04-16
	fairview, New Jersey, United States	2012-04-17
	Reading, Massachusetts, United States	2012-04-17
	middletown, Connecticut, United States	2012-04-17
	Englewood, Colorado, United States	2012-04-17
	Elk Rapids, Michigan, United States	2012-04-17
	Austin, Texas, United States	2012-04-17
	Marion, Iowa, United States	2012-04-17
	Stevensville, Montana, United States	2012-04-17
	Hardy, Arkansas, United States	2012-04-17
	honolulu, Hawaii, United States	2012-04-18
	Eagle, United Kingdom	2012-04-18
	Kissimmee, Florida, United States	2012-04-18
	Coventry, Connecticut, United States	2012-04-18
	N/A, District Of Columbia, United States	2012-04-18
	New York, New York, United States	2012-04-18

Name	Location	Date
[redacted]	kawkawlin, Michigan, United States	2012-04-18
[redacted]	La Vergne, Tennessee, United States	2012-04-18
[redacted]	Hilliard, Ohio, United States	2012-04-18
[redacted]	Royersford, Pennsylvania, United States	2012-04-18
[redacted]	North Street, Michigan, United States	2012-04-18
[redacted]	Scarsdale, New York, United States	2012-04-18
[redacted]	Gilbert, Arizona, United States	2012-04-18
[redacted]	Vancouver, Canada	2012-04-18
[redacted]	Leonardo, New Jersey, United States	2012-04-18
[redacted]	Wilmette, Illinois, United States	2012-04-18
[redacted]	salt lake city, Utah, United States	2012-04-18
[redacted]	New Lenox, Illinois, United States	2012-04-18
[redacted]	SAINT LEU LA FORET, France	2012-04-19
[redacted]	Teaneck, New Jersey, United States	2012-04-19
[redacted]	Houston, Texas, United States	2012-04-19
[redacted]	Mineola, New York, United States	2012-04-19
[redacted]	Scottsdale, Arizona, United States	2012-04-19
[redacted]	ARDMORE, Pennsylvania, United States	2012-04-19
[redacted]	Oak Ridge, Tennessee, United States	2012-04-19
[redacted]	Marysville, Washington, United States	2012-04-19
[redacted]	Northwood, Ohio, United States	2012-04-19
[redacted]	Midland, Michigan, United States	2012-04-19
[redacted]	Albany, New York, United States	2012-04-19
[redacted]	Indiana, Pennsylvania, United States	2012-04-19
[redacted]	Southend-on-Sea, United Kingdom	2012-04-20
[redacted]	Livermore, California, United States	2012-04-20
[redacted]	Wareham, Massachusetts, United States	2012-04-20
[redacted]	Rye, New Hampshire, United States	2012-04-20
[redacted]	Abilene, Texas, United States	2012-04-20
[redacted]	Santa Fe, New Mexico, United States	2012-04-20

Name	Location	Date
[redacted]	Buffalo, New York, United States	2012-04-20
	Va Beach, Virginia, United States	2012-04-20
	now, United Kingdom	2012-04-20
	Pearl River, New York, United States	2012-04-21
	BURBANK, California, United States	2012-04-21
	edison, New Jersey, United States	2012-04-21
	Elk, California, United States	2012-04-21
	Dallas, Texas, United States	2012-04-21
	Bridgewater, New Jersey, United States	2012-04-21
	Cleveland, Texas, United States	2012-04-21
	Citrus Heights, California, United States	2012-04-21
	Kittery Point, Maine, United States	2012-04-22
	Henryetta, Oklahoma, United States	2012-04-22
	Fort Branch, Indiana, United States	2012-04-22
	WALLINGFORD, Connecticut, United States	2012-04-22
	Potomac, Maryland, United States	2012-04-22
	potomac, Maryland, United States	2012-04-22
	Pepper Pike, Ohio, United States	2012-04-22
	Newark, New Jersey, United States	2012-04-22
	Erie, Pennsylvania, United States	2012-04-22
	Peekskill, New York, United States	2012-04-22
	ny, New York, United States	2012-04-22
	Manchester, New Hampshire, United States	2012-04-23
	Lynchburg, Virginia, United States	2012-04-23
	Derry, New Hampshire, United States	2012-04-23
	Wilmington, North Carolina, United States	2012-04-23
	San Luis Obispo, California, United States	2012-04-23
	Phoeix, Arizona, United States	2012-04-23

Name	Location	Date
[redacted]	Montrose, New York, United States	2012-04-23
[redacted]	Riverside, Rhode Island, United States	2012-04-23
[redacted]	Muncie, Indiana, United States	2012-04-23
[redacted]	Irvine, California, United States	2012-04-23
[redacted]	tigard, Oregon, United States	2012-04-23
[redacted]	grants pass, Oregon, United States	2012-04-23
[redacted]	Edgewood, Maryland, United States	2012-04-23
[redacted]	Ellisville, Missouri, United States	2012-04-23
[redacted]	westfield, New York, United States	2012-04-23
[redacted]	Port St Lucie, Florida, United States	2012-04-23
[redacted]	Dallas, Texas, United States	2012-04-23
[redacted]	Ann Arbor, Michigan, United States	2012-04-23
[redacted]	Seattle, Washington, United States	2012-04-23
[redacted]	Campbell, California, United States	2012-04-23
[redacted]	Findlay, Ohio, United States	2012-04-24
[redacted]	spokane, Washington, United States	2012-04-24
[redacted]	warren, Maine, United States	2012-04-24
[redacted]	New York, New York, United States	2012-04-24
[redacted]	Freehold, New Jersey, United States	2012-04-24
[redacted]	Porterville, California, United States	2012-04-24
[redacted]	Kapaa, Hawaii, United States	2012-04-24
[redacted]	San Pedro, California, United States	2012-04-24
[redacted]	Dove Creek, Colorado, United States	2012-04-24
[redacted]	Cape Coral, Florida, United States	2012-04-24
[redacted]	New York, New York, United States	2012-04-24
[redacted]	Jenkintown, Pennsylvania, United States	2012-04-24
[redacted]	livermore, California, United States	2012-04-24
[redacted]	Oakland, California, United States	2012-04-24
[redacted]	East Norriton, Pennsylvania, United States	2012-04-24

Name	Location	Date
[redacted]	Madison, Wisconsin, United States	2012-04-25
	Placentia, California, United States	2012-04-25
	Ramona, California, United States	2012-04-25
	glen burnie, Maryland, United States	2012-04-25
	Long Branch, New Jersey, United States	2012-04-25
	Port St Lucie, Florida, United States	2012-04-25
	Staunton, Virginia, United States	2012-04-25
	San Juan Capistrano, California, United States	2012-04-25
	WILLOWBROOK, Illinois, United States	2012-04-25
	Cooper City, Florida, United States	2012-04-25
	Boston, Massachusetts, United States	2012-04-25
	Sherman Oaks, California, United States	2012-04-25
	Bremerton, Washington, United States	2012-04-26
	Northfield, Minnesota, United States	2012-04-26
	Sofiq, Bulgaria	2012-04-26
	Pleasanton, California, United States	2012-04-26
	blackpool, United Kingdom	2012-04-26
	Hagerstown, Maryland, United States	2012-04-26
	asd, Massachusetts, United States	2012-04-27
	East Lansing, Michigan, United States	2012-04-27
	Long Branch, New Jersey, United States	2012-04-28
	Belgium, Wisconsin, United States	2012-04-28
	Lakeland, Florida, United States	2012-04-28
	charlottesville, Virginia, United States	2012-04-29
	Lemont, Illinois, United States	2012-04-29
	Emporium, Pennsylvania, United States	2012-04-29
	Edison, New Jersey, United States	2012-04-29
	Gardner, Massachusetts, United States	2012-04-29
	kennewick, Washington, United States	2012-04-29

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Name	Location	Date
[redacted]	New Orleans, Louisiana, United States	2012-04-29
[redacted]	Manchester, Massachusetts, United States	2012-04-30
[redacted]	Cambridge, Massachusetts, United States	2012-04-30
[redacted]	Durham, North Carolina, United States	2012-04-30
[redacted]	SpringBrook Twp., Pennsylvania, United States	2012-04-30
[redacted]	New York, New York, United States	2012-04-30
[redacted]	North Bergen, New Jersey, United States	2012-04-30
[redacted]	New York, New York, United States	2012-05-01
[redacted]	New York, New York, United States	2012-05-02
[redacted]	Norwich, New York, United States	2012-05-02
[redacted]	Willowick, Ohio, United States	2012-05-02
[redacted]	White Plains, New York, United States	2012-05-02
[redacted]	Dallas, Texas, United States	2012-05-02
[redacted]	Oneonta, New York, United States	2012-05-02
[redacted]	Harrisburg, Pennsylvania, United States	2012-05-02
[redacted]	Tulsa, Oklahoma, United States	2012-05-02
[redacted]	Roslyn Heights, New York, United States	2012-05-03
[redacted]	Flemington, New Jersey, United States	2012-05-03
[redacted]	Santa Rosa, California, United States	2012-05-03
[redacted]	Dallas, Texas, United States	2012-05-03
[redacted]	Renton, Washington, United States	2012-05-03
[redacted]	Mesquite, Texas, United States	2012-05-03
[redacted]	Dompierre sur Mer, France	2012-05-03
[redacted]	New York, New York, United States	2012-05-04
[redacted]	FT MYERS, Florida, United States	2012-05-04
[redacted]	Engelwood, Colorado, United States	2012-05-04
[redacted]	willow springs, Illinois, United States	2012-05-04
[redacted]	Rockville, New York, United States	2012-05-04
[redacted]	Rehoboth, Massachusetts, United States	2012-05-04

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To: The Governor of NJ, State Sen. Michael Doherty (NJ-023), State Sen. Christopher Bateman (NJ-016), State Sen. Barbara Buono (NJ-018), State Sen. Raymond Lesniak (NJ-020), State Sen. Stephen Sweeney (NJ-003), Sen. Frank Lautenberg (NJ), Sen. Robert Menendez (NJ), Rep. Rush Holt (NJ-12), Rep. Frank Pallone (NJ-06), Sen. Barbara Boxer (CA), State Sen. Bob Smith (NJ-017), Rep. Leonard Lance (NJ-07), Rep. Rodney Frelinghuysen (NJ-11), USEPA Remedial Project Manager (Joseph Battipaglia), USEPA Region 2 Administrator (Judith Enck), USEPA Administrator (Lisa Jackson), USEPA Region 2 Superfund Chief (Walter Mugdan), NJDEP Commissioner (Bob Martin), MSNBC (Rachel Maddow), Mayor of Bound Brook (Carey Pilato), Mayor of Bridgewater (Daniel J. Hayes, Jr), Mayor of Manville (Angelo Corradino), Pfizer (Wendy Lazarus), Pfizer (Russell Downey)

Subject: Re: American Cyanamid Proposed Plan Comment

Letter: Greetings,

I respectfully request that the United States Environmental Protection Agency (USEPA) requires Pfizer to properly remediate the 80-year old American Cyanamid Superfund Site in Bridgewater, NJ. In order to protect human health and the environment, USEPA must require Pfizer to remediate the site using "Alternative 7," not "Alternative 4A," as described in their 2012 Proposed Plan. I do not believe the selected remedy, Alternative 4A, will be protective of human health and the environment for the following reasons: Filling in a floodplain and capping the site is NOT a full remediation, and could vastly expand serious toxic flooding for thousands of neighboring families, which poses a serious health threat.

The Proposed Plan Alternative 4A proposes to cover the contamination with a combination of soil and engineering caps. For the larger portions of the site, Pfizer proposes to raise the gradient two feet. As you are aware, this site lies in the floodplain and, as the most recent flood of Hurricane Irene shows, the American Cyanamid Site can hold about 300,000,000 gallons of water. Placing two feet of fill on the site will reduce its flood storage capacity and could exacerbate the regional flood issue in the area. In addition, filling of a flood zone is subject to both New Jersey and Federal regulations. These regulations specify that there can be no net filling of the wetlands or a flood zone, which means you cannot fill one area of the site without removing fill from some other location so the status quo doesn't change. There is no discussion in the Proposed Plan of the impacts on flooding that the proposed capping will have. This MUST be addressed before any plan is entertained and then accepted.

The Proposed Plan outlines more applicable cleanup alternatives than Alternative 4A suggests, including low temperature desorption. This method was successfully used at the Cornell-Dubilier Superfund Site in South Plainfield to remediate soils with high levels of PCBs and heavy metals without disturbing the surrounding community. In addition, the USEPA and Pfizer can make use of an active rail line that runs through the site to properly dispose of this material.

I am also highly concerned that Alternative 4A could drastically expand serious toxic flooding for thousands of neighboring families that are already plagued by heavy floodwaters. The Proposed Plan is completely silent of the impacts of filling, and this most critical aspect of the American Cyanamid site MUST be clearly presented. The implemented plan must assure it will not exacerbate flooding in the lower Raritan River. The U.S. Army Corps of Engineers is actively working on flood control projects in the Raritan River Watershed to help alleviate flooding in Manville, Bound Brook, Bridgewater and all surrounding towns. The American Cyanamid site is a natural fit for a regional flood control project and can be an environmental benefit for the region if the proper remedy is selected. This site also sits directly adjacent to the Raritan River, as well as the Delaware and Raritan Canal, which is used for drinking water for hundreds of thousands of families in the surrounding area.

This site cleanup has been languishing for over two decades, and it is time for the USEPA to take serious action. In order to protect the health and safety of families that utilize this area for recreation, USEPA must require a proper cleanup as outlined in Alternative 7 in the Proposed Plan. With Pfizer having a facility already constructed and the technology for treatment well established, the cost estimates for Alternative 7 are greatly exaggerated and in reality can provide cost effective and permanent remediation of the American Cyanamid Superfund Site.

I respectfully request for the USEPA to allow a 60 day extension for the public comment period due to the size and scope of this cleanup. I believe the public needs additional time to review relevant data and an extension is more than warranted due to the complexity of the Proposed Plan.

For the bikers, hikers, fisherman and kayakers, for the osprey, bald eagles, turtles and trout please choose Alternative 7 for the cleanup of this site and take immediate action to remove the toxic chemicals draining into our regional resource, the Raritan River. Thank you for your timely assistance on this important environmental issue.

Respectfully,

SIGNATURES

	Name	City	State	Date
1	[redacted]	Edison	New Jersey	2/24/2012
2	[redacted]	Old Bridge	New Jersey	2/24/2012
3	[redacted]	Camden	New Jersey	2/24/2012
4	[redacted]	Pompton Lakes	New Jersey	2/24/2012
5	[redacted]	East Brunswick	New Jersey	2/24/2012
6	[redacted]	Morrice	Michigan	2/24/2012
7	[redacted]	Pleasant Hill	California	2/24/2012
8	[redacted]	Chicago	Illinois	2/24/2012
9	[redacted]	Seaside Heights	New Jersey	2/24/2012
10	[redacted]	Los Angeles	California	2/24/2012
11	[redacted]	Pompton Lakes	New Jersey	2/24/2012
12	[redacted]	Bloomfiled	New Jersey	2/24/2012
13	[redacted]	Hasselt	Texas	2/24/2012
14	[redacted]	St Augustine	Florida	2/24/2012
15	[redacted]	Bundang		2/24/2012
16	[redacted]	Linden	New Jersey	2/24/2012
17	[redacted]	Pompton Lakes	New Jersey	2/24/2012
18	[redacted]	Ava	Missouri	2/24/2012
19	[redacted]	colo spgs	Colorado	2/24/2012
20	[redacted]	Edison	New Jersey	2/24/2012
21	[redacted]	Mountain View	California	2/24/2012
22	[redacted]	Toms River	New Jersey	2/24/2012
23	[redacted]			2/24/2012
24	[redacted]	Kendall Park	New Jersey	2/24/2012
25	[redacted]	edison	New Jersey	2/24/2012
26	[redacted]	Chatham	New Jersey	2/24/2012
27	[redacted]	South Amboy	New Jersey	2/24/2012
28	[redacted]	Edison	New Jersey	2/24/2012
29	[redacted]	Pompton Lakes	New Jersey	2/24/2012
30	[redacted]	Highlands	New Jersey	2/24/2012
31	[redacted]	Denver	Colorado	2/24/2012
32	[redacted]	Edison	New Jersey	2/24/2012
33	[redacted]	Glenmont	New York	2/24/2012
34	[redacted]	Wolf Creek	Oregon	2/24/2012
35	[redacted]	HOPEWELL JUNCTION	New York	2/24/2012
36	[redacted]	New Brunswick	New Jersey	2/24/2012
37	[redacted]	Plano	Texas	2/24/2012
38	[redacted]	Yalta	Alabama	2/24/2012
39	[redacted]	Florham Park	New Jersey	2/24/2012
40	[redacted]	Burlington	Vermont	2/24/2012
41	[redacted]	Focsani		2/24/2012
42	[redacted]	New Brunswick	New Jersey	2/24/2012
43	[redacted]	edison	New Jersey	2/24/2012
44	[redacted]	Red Bank	New Jersey	2/24/2012

	Name	City	State	Date
45	[redacted]	Sleepy Hollow	Illinois	2/24/2012
46	[redacted]	Rutherford	New Jersey	2/24/2012
47	[redacted]	Woodbridge	New Jersey	2/24/2012
48	[redacted]	New Brunswick	New Jersey	2/24/2012
49	[redacted]	Holmdel	New Jersey	2/24/2012
50	[redacted]	chicago	Illinois	2/24/2012
51	[redacted]	New Brunswick	New Jersey	2/24/2012
52	[redacted]	Edison	New Jersey	2/24/2012
53	[redacted]	Quinton	Virginia	2/24/2012
54	[redacted]	High Springs	Florida	2/24/2012
55	[redacted]	highland park	New Jersey	2/24/2012
56	[redacted]	Cliffwood Beach	New Jersey	2/24/2012
57	[redacted]	Sauk City	Wisconsin	2/24/2012
58	[redacted]	elmwood park	New Jersey	2/24/2012
59	[redacted]	Binghamton	New York	2/24/2012
60	[redacted]	Edison	New Jersey	2/25/2012
61	[redacted]	Rutland	Vermont	2/25/2012
62	[redacted]	North Brunswick Twp	New Jersey	2/25/2012
63	[redacted]	Long Branch	New Jersey	2/25/2012
64	[redacted]	Plainsboro	New Jersey	2/25/2012
65	[redacted]	Chicago	Illinois	2/25/2012
66	[redacted]	Hillsborough	New Jersey	2/25/2012
67	[redacted]	Monmouth Junction	New Jersey	2/25/2012
68	[redacted]	Rutland	Vermont	2/25/2012
69	[redacted]	pompton lakes nj	New Jersey	2/25/2012
70	[redacted]	Westfield	New Jersey	2/25/2012
71	[redacted]	Phoenix	Arizona	2/25/2012
72	[redacted]	Leadville	Colorado	2/25/2012
73	[redacted]	Macedonia	Ohio	2/25/2012
74	[redacted]	Bound Brook	New Jersey	2/25/2012
75	[redacted]	flagstaff	Arkansas	2/25/2012
76	[redacted]	CHESAPEAKE	Virginia	2/25/2012
77	[redacted]	Dayton	New Jersey	2/25/2012
78	[redacted]	Eliot	Maine	2/25/2012
79	[redacted]	St. PÃ¶lten	Nevada	2/25/2012
80	[redacted]	Orrefors		2/25/2012
81	[redacted]	Pasadena	Maryland	2/25/2012
82	[redacted]	fort lauderdale	Florida	2/25/2012
83	[redacted]	Webster	Texas	2/26/2012
84	[redacted]	Edmond	Oklahoma	2/26/2012
85	[redacted]	Dayton	New Jersey	2/26/2012
86	[redacted]	Vienna	Arizona	2/26/2012
87	[redacted]	Mansfield Center	Connecticut	2/26/2012
88	[redacted]	Sussex	Wisconsin	2/26/2012
89	[redacted]	Los Angeles	California	2/26/2012

	Name	City	State	Date
90	[redacted]	Sosnowiec	Virgin Islands	2/26/2012
91	[redacted]	Metz		2/26/2012
92	[redacted]	McKenzie	Tennessee	2/26/2012
93	[redacted]	Scotch Plains	New Jersey	2/26/2012
94	[redacted]	North Plainfield	New Jersey	2/26/2012
95	[redacted]	Escondido	California	2/26/2012
96	[redacted]	ALDERSHOT		2/26/2012
97	[redacted]	Ivanic		2/26/2012
98	[redacted]	Washington	Georgia	2/26/2012
99	[redacted]	Manhattan	New York	2/26/2012
100	[redacted]	Dublin	Illinois	2/26/2012
101	[redacted]	Madrid/Spain	Alabama	2/26/2012
102	[redacted]	Mansfield Center	Connecticut	2/26/2012
103	[redacted]	piedmont	California	2/26/2012
104	[redacted]	Lincoln	Alabama	2/26/2012
105	[redacted]	Caldas da Rainha		2/26/2012
106	[redacted]	Arnold	Missouri	2/26/2012
107	[redacted]	Oregon City	Oregon	2/26/2012
108	[redacted]	Klamath Falls	Oregon	2/26/2012
109	[redacted]	Sonoma	California	2/26/2012
110	[redacted]	Merville		2/26/2012
111	[redacted]	Long Island City	New York	2/26/2012
112	[redacted]	Culver City	California	2/26/2012
113	[redacted]	Seattle	Washington	2/26/2012
114	[redacted]	Reno	Nevada	2/26/2012
115	[redacted]	Trabuco Canyon	California	2/26/2012
116	[redacted]	Providence	Rhode Island	2/26/2012
117	[redacted]	Washington Island	Wisconsin	2/26/2012
118	[redacted]	Tampa	Florida	2/26/2012
119	[redacted]	south fork	Colorado	2/26/2012
120	[redacted]	commack	New York	2/26/2012
121	[redacted]	chatel-st-denis	Mississippi	2/26/2012
122	[redacted]	Denver	Colorado	2/26/2012
123	[redacted]	Bottrop	Indiana	2/26/2012
124	[redacted]	Cameron Park	California	2/26/2012
125	[redacted]	Blacksburg	Virginia	2/26/2012
126	[redacted]	Tappan	New York	2/26/2012
127	[redacted]	Montpellier	Vermont	2/26/2012
128	[redacted]	Smyrna	Georgia	2/26/2012
129	[redacted]	Azusa	California	2/26/2012
130	[redacted]	belmont	California	2/26/2012
131	[redacted]	New York	New York	2/26/2012
132	[redacted]	Bothell	Washington	2/26/2012
133	[redacted]	old bethpage	New York	2/26/2012
134	[redacted]	benton	Arkansas	2/26/2012

	Name	City	State	Date
135	[redacted]	Roswell	New Mexico	2/26/2012
136	[redacted]	High Falls	New York	2/26/2012
137	[redacted]	Valley Stream	New York	2/26/2012
138	[redacted]	Anderson	California	2/26/2012
139	[redacted]	Seattle	Washington	2/26/2012
140	[redacted]	Eatonville	Washington	2/26/2012
141	[redacted]	West Tremont	Maine	2/26/2012
142	[redacted]	Warrenton	Oregon	2/26/2012
143	[redacted]	Bethel Park	Pennsylvania	2/26/2012
144	[redacted]	Cincinnati	Ohio	2/26/2012
145	[redacted]	Phoenix	Arizona	2/26/2012
146	[redacted]	Fircrest	Washington	2/26/2012
147	[redacted]	Fort Worth	Texas	2/26/2012
148	[redacted]	Willow	New York	2/26/2012
149	[redacted]	Bridgewater	New Jersey	2/26/2012
150	[redacted]	nsw	Idaho	2/26/2012
151	[redacted]	Ann Arbor	Michigan	2/26/2012
152	[redacted]	Chicago	Illinois	2/26/2012
153	[redacted]	Kapaa	Hawaii	2/26/2012
154	[redacted]	Fall River,	Massachusetts	2/26/2012
155	[redacted]	Tujunga	California	2/26/2012
156	[redacted]	nsw	Idaho	2/26/2012
157	[redacted]	nsw	Idaho	2/26/2012
158	[redacted]	Findlay	Ohio	2/26/2012
159	[redacted]	Cardiff	California	2/26/2012
160	[redacted]	san francisco	California	2/26/2012
161	[redacted]	Westminster	Colorado	2/26/2012
162	[redacted]	Old Hickory	Tennessee	2/26/2012
163	[redacted]	Carpinteria	California	2/26/2012
164	[redacted]	Sedona	Arizona	2/26/2012
165	[redacted]	Monte Rio	California	2/26/2012
166	[redacted]	Seattle	Washington	2/26/2012
167	[redacted]	Orlando	Florida	2/26/2012
168	[redacted]	Breitenfurt		2/26/2012
169	[redacted]	Tulsa	Oklahoma	2/26/2012
170	[redacted]	Las Cruces	New Mexico	2/26/2012
171	[redacted]	Chicago	Illinois	2/26/2012
172	[redacted]	Oshawa		2/26/2012
173	[redacted]	lawrence	Pennsylvania	2/26/2012
174	[redacted]	St. Helens	Oregon	2/26/2012
175	[redacted]	Tucson	Arizona	2/26/2012
176	[redacted]	Palm Bay	Florida	2/26/2012
177	[redacted]	Lexington	Kentucky	2/26/2012
178	[redacted]	Farmington Hills	Michigan	2/26/2012
179	[redacted]	Cornville	Arizona	2/26/2012

	Name	City	State	Date
180	[redacted]	new york	New York	2/26/2012
181	[redacted]	Phoenix	Arizona	2/26/2012
182	[redacted]	Lewiston	Maine	2/26/2012
183	[redacted]	Phoenix	Arizona	2/26/2012
184	[redacted]	Orange	California	2/26/2012
185	[redacted]	Matawan	New Jersey	2/26/2012
186	[redacted]	Riverton	Connecticut	2/26/2012
187	[redacted]	Los Angeles	California	2/26/2012
188	[redacted]	Aspen	Colorado	2/26/2012
189	[redacted]	traverse city	Michigan	2/26/2012
190	[redacted]	Pendleton	New York	2/26/2012
191	[redacted]	Austin	Minnesota	2/26/2012
192	[redacted]	Dunedin	Florida	2/26/2012
193	[redacted]	Sacramento	California	2/26/2012
194	[redacted]	Poulsbo	Washington	2/26/2012
195	[redacted]	Jamesburg	New Jersey	2/26/2012
196	[redacted]	Boston	Massachusetts	2/26/2012
197	[redacted]	Los Angeles	California	2/26/2012
198	[redacted]	Bellingham	Washington	2/26/2012
199	[redacted]	Silver Spring	Maryland	2/26/2012
200	[redacted]	Cranford	New Jersey	2/26/2012
201	[redacted]	Jackson	New Jersey	2/26/2012
202	[redacted]	Rochester		2/26/2012
203	[redacted]	Miami	Florida	2/26/2012
204	[redacted]	Brookeville	Maryland	2/26/2012
205	[redacted]	Portsmouth	Rhode Island	2/26/2012
206	[redacted]	Cottage Grove	Minnesota	2/26/2012
207	[redacted]	Portland	Oregon	2/26/2012
208	[redacted]	Au/ZH	Alabama	2/26/2012
209	[redacted]	Henrico	Virginia	2/26/2012
210	[redacted]	Philadelphia	Pennsylvania	2/26/2012
211	[redacted]	Winter Park	Florida	2/26/2012
212	[redacted]	Simpsonville	South Carolina	2/26/2012
213	[redacted]	High Point	North Carolina	2/26/2012
214	[redacted]	Port Orchard	Washington	2/26/2012
215	[redacted]	New York	New York	2/26/2012
216	[redacted]	Kilauea	Hawaii	2/26/2012
217	[redacted]	Tucson	Arizona	2/26/2012
218	[redacted]	Manchester	Missouri	2/26/2012
219	[redacted]	vancouver	Washington	2/26/2012
220	[redacted]	St Louis Park	Minnesota	2/26/2012
221	[redacted]	Delray Beach	Florida	2/26/2012
222	[redacted]	San Diego	California	2/26/2012
223	[redacted]	Willowick	Ohio	2/26/2012
224	[redacted]	San Ramon	California	2/26/2012

	Name	City	State	Date
22	[redacted]	San Jose	California	2/26/2012
22	[redacted]	melksham	New York	2/26/2012
22	[redacted]	Louisville	Colorado	2/26/2012
22	[redacted]	Oklahoma City	Oklahoma	2/26/2012
22	[redacted]	Ouray	Colorado	2/26/2012
23	[redacted]	Englewood	New Jersey	2/26/2012
23	[redacted]	BORDEAUX FRANCE	Alaska	2/26/2012
23	[redacted]	Fort Smith	Arkansas	2/26/2012
23	[redacted]	muskegon	Michigan	2/26/2012
23	[redacted]	LEBANON	Indiana	2/26/2012
23	[redacted]	Decatur	Illinois	2/26/2012
23	[redacted]	Friendswood	Texas	2/26/2012
23	[redacted]	altamonte springs	Florida	2/26/2012
23	[redacted]	Dublin		2/26/2012
23	[redacted]	Cooperstown	New York	2/26/2012
24	[redacted]	New Castle	Pennsylvania	2/26/2012
24	[redacted]	climax	New York	2/26/2012
24	[redacted]	Milton	Massachusetts	2/26/2012
24	[redacted]	Belmont	Massachusetts	2/26/2012
24	[redacted]	KrakÃ³w		2/26/2012
24	[redacted]	Keller	Texas	2/26/2012
24	[redacted]	El Cajon	California	2/26/2012
24	[redacted]	Glenn Dale	Maryland	2/26/2012
24	[redacted]	Highland	Indiana	2/26/2012
24	[redacted]	Mosheim	Tennessee	2/26/2012
250	[redacted]	Rochester	New York	2/26/2012
251	[redacted]	Canyon Country	California	2/26/2012
252	[redacted]	Scarborough	New York	2/26/2012
253	[redacted]	brooklyn	New York	2/26/2012
254	[redacted]	Sycamore	Illinois	2/26/2012
255	[redacted]	york	Pennsylvania	2/26/2012
256	[redacted]	Boynton Beach	Florida	2/26/2012
257	[redacted]	Pensacola	Florida	2/26/2012
258	[redacted]	Granada Hills	California	2/26/2012
259	[redacted]	San Rafael	California	2/26/2012
260	[redacted]	Ingleside	Illinois	2/26/2012
261	[redacted]	Freeport	Florida	2/26/2012
262	[redacted]	BesanÃ§on	New York	2/26/2012
263	[redacted]	Milton	Pennsylvania	2/26/2012
264	[redacted]	rochester	New York	2/26/2012
265	[redacted]	Aguadilla	Puerto Rico	2/26/2012
266	[redacted]	Cloverdale	California	2/26/2012
267	[redacted]	Port Orford	Oregon	2/26/2012
268	[redacted]	Canton	Georgia	2/26/2012
269	[redacted]	Warsaw		2/26/2012

	Name	City	State	Date
270	[redacted]	La Follette	Tennessee	2/26/2012
271		Neptune	New Jersey	2/26/2012
272		Gladstone	Oregon	2/26/2012
273		Highland Village	Texas	2/26/2012
274		Denfield	California	2/26/2012
275		Portland	Oregon	2/26/2012
276		Watervliet	New York	2/26/2012
277		Wichita	Kansas	2/26/2012
278		Nashville	Tennessee	2/26/2012
279		Jamaica Plain	Massachusetts	2/26/2012
280		St.Paul	Minnesota	2/26/2012
281		Kempfeld	Delaware	2/26/2012
282		Weston	Connecticut	2/26/2012
283		ft. lauderdale	Florida	2/26/2012
284		terlingua	Texas	2/26/2012
285		Minneapoilis	Minnesota	2/26/2012
286		Denver	Colorado	2/26/2012
287		Ashland	Oregon	2/26/2012
288		Houston	Texas	2/26/2012
289		Wilmington	Ohio	2/26/2012
290		Long Beach	New York	2/26/2012
291		woodacre	California	2/26/2012
292		San Francisco	California	2/26/2012
293		quimperlÃ©		2/26/2012
294		Aguilar	Colorado	2/26/2012
295		Augusta	Georgia	2/26/2012
296		Mill Valley	California	2/26/2012
297		Eureka	California	2/26/2012
298		Middlesex	New Jersey	2/26/2012
299		Vancouver	Washington	2/26/2012
300		Plant City	Florida	2/26/2012
301		Concord	California	2/26/2012
302		San Diego	California	2/26/2012
303		Spicewood	Texas	2/26/2012
304		Twisp	Washington	2/26/2012
305		El Prado	New Mexico	2/26/2012
306		Lewes	Delaware	2/26/2012
307		Cypress	California	2/26/2012
308		Austin	Texas	2/26/2012
309		Bethesda	Ohio	2/26/2012
310		Tucson	Arizona	2/26/2012
311		Portland	Oregon	2/26/2012
312		Albany	Oregon	2/26/2012
313		Royal Palm Beach	Florida	2/26/2012
314		Boulder	Colorado	2/26/2012

	Name	City	State	Date
315	[redacted]	Eugene	Oregon	2/26/2012
316	[redacted]	Bakerfield	California	2/26/2012
317	[redacted]	Ellicott City	Maryland	2/26/2012
318	[redacted]	boulder creek	California	2/26/2012
319	[redacted]	Stillwater	Oklahoma	2/26/2012
320	[redacted]	staten island	New York	2/26/2012
321	[redacted]	e	Ohio	2/26/2012
322	[redacted]	phoenix	Arizona	2/26/2012
323	[redacted]	Lantier	Florida	2/26/2012
324	[redacted]	zumbrota	Minnesota	2/26/2012
325	[redacted]	Sarasota	Florida	2/26/2012
326	[redacted]	Philadelphia	Pennsylvania	2/26/2012
327	[redacted]	Akron	Ohio	2/26/2012
328	[redacted]	Las Vegas	Nevada	2/26/2012
329	[redacted]	Moreland Hills	Ohio	2/26/2012
330	[redacted]	Kalamazoo	Michigan	2/26/2012
331	[redacted]	Campbell	California	2/26/2012
332	[redacted]	Woodland Park	Colorado	2/26/2012
333	[redacted]	Pompton Lakes	New Jersey	2/26/2012
334	[redacted]	Newark	Delaware	2/26/2012
335	[redacted]	Chicago	Illinois	2/26/2012
336	[redacted]	Montfort	Wisconsin	2/26/2012
337	[redacted]	st james city	Florida	2/26/2012
338	[redacted]	Desert Hot Springs	California	2/26/2012
339	[redacted]	Decatur	Illinois	2/26/2012
340	[redacted]	Windsor	Oregon	2/26/2012
341	[redacted]	SF	California	2/26/2012
342	[redacted]	Chelsea	Massachusetts	2/26/2012
343	[redacted]	bentonville	Arkansas	2/26/2012
344	[redacted]	Brooklyn	New York	2/26/2012
345	[redacted]	Mechanicsville	Virginia	2/26/2012
346	[redacted]	Eden Prairie	Minnesota	2/26/2012
347	[redacted]	San Jose	California	2/26/2012
348	[redacted]	Murfreesboro	Tennessee	2/26/2012
349	[redacted]	Stayner	Puerto Rico	2/26/2012
350	[redacted]	penfield	New York	2/26/2012
351	[redacted]	Rowayton	Connecticut	2/26/2012
352	[redacted]	Austin	Texas	2/26/2012
353	[redacted]	Beaverton	Oregon	2/26/2012
354	[redacted]	Vienna	Ohio	2/26/2012
355	[redacted]	Springville	Tennessee	2/26/2012
356	[redacted]	New York	New York	2/26/2012
357	[redacted]	West Townsend	Massachusetts	2/26/2012
358	[redacted]	San Jose	California	2/26/2012
359	[redacted]	Sullivan	Maine	2/26/2012

	Name	City	State	Date
360	[redacted]	Corrigan	Texas	2/26/2012
361	[redacted]	Bronx	New York	2/26/2012
362	[redacted]	Orange Park	Florida	2/26/2012
363	[redacted]	Salt Lake Cty	Utah	2/26/2012
364	[redacted]	Medford	Oregon	2/26/2012
365	[redacted]	Baltimore	Maryland	2/26/2012
366	[redacted]	Maastricht		2/26/2012
367	[redacted]	San Francisco	California	2/26/2012
368	[redacted]	Victoria		2/26/2012
369	[redacted]	Austin	Texas	2/26/2012
370	[redacted]	W. Hollywood	California	2/26/2012
371	[redacted]	San Mateo	California	2/26/2012
372	[redacted]	Hillsborough	New Jersey	2/27/2012
373	[redacted]	Pittsburgh	Pennsylvania	2/27/2012
374	[redacted]	Boulder	Colorado	2/27/2012
375	[redacted]	Pearl River	New York	2/27/2012
376	[redacted]	Sacramento	California	2/27/2012
377	[redacted]	Williamstown	New York	2/27/2012
378	[redacted]	dublin	District Of Columbia	2/27/2012
379	[redacted]	Dallas	Texas	2/27/2012
380	[redacted]	Tecate	California	2/27/2012
381	[redacted]	oberlin	Ohio	2/27/2012
382	[redacted]	Phoenix	Arizona	2/27/2012
383	[redacted]	Indianapolis	Indiana	2/27/2012
384	[redacted]	Hancock	New York	2/27/2012
385	[redacted]	Lawrence	Kansas	2/27/2012
386	[redacted]	Boise	Idaho	2/27/2012
387	[redacted]	santa fe	New Mexico	2/27/2012
388	[redacted]	Granite Bay	California	2/27/2012
389	[redacted]	El Cerrito	California	2/27/2012
390	[redacted]	Harrisburg	Pennsylvania	2/27/2012
391	[redacted]	Gillette	New Jersey	2/27/2012
392	[redacted]	Seattle	Washington	2/27/2012
393	[redacted]	san anselmo	California	2/27/2012
394	[redacted]	eNGLISHTOWN	New Jersey	2/27/2012
395	[redacted]	Portland	Oregon	2/27/2012
396	[redacted]	Belmont	Massachusetts	2/27/2012
397	[redacted]	Rosalie	Nebraska	2/27/2012
398	[redacted]	Henderson	Nevada	2/27/2012
399	[redacted]	Asheville	North Carolina	2/27/2012
400	[redacted]	North Kansas City	Missouri	2/27/2012
401	[redacted]	Minneapolis	Minnesota	2/27/2012
402	[redacted]	NY	New York	2/27/2012
403	[redacted]	san antonio	Texas	2/27/2012
404	[redacted]	Roslyn Heights	New York	2/27/2012

	Name	City	State	Date
405	[redacted]	-	Texas	2/27/2012
406	[redacted]	Elizabethton	Tennessee	2/27/2012
407	[redacted]	Minneapolis	Minnesota	2/27/2012
408	[redacted]	Bradenton	Florida	2/27/2012
409	[redacted]	Ludlow	Kentucky	2/27/2012
410	[redacted]	Solon	Ohio	2/27/2012
411	[redacted]	Tiffin	Ohio	2/27/2012
412	[redacted]	stone mountain	Georgia	2/27/2012
413	[redacted]	Bellingham	Washington	2/27/2012
414	[redacted]	Lansdale	Pennsylvania	2/27/2012
415	[redacted]	Bronx	New York	2/27/2012
416	[redacted]	Santiago	South Carolina	2/27/2012
417	[redacted]	Distrito Federal		2/27/2012
418	[redacted]	Coaldale	Colorado	2/27/2012
419	[redacted]	Brookings	Oregon	2/27/2012
420	[redacted]	Schenectady	New York	2/27/2012
421	[redacted]	Boca Raton	Florida	2/27/2012
422	[redacted]	little rock	Arkansas	2/27/2012
423	[redacted]	Spicewood	Texas	2/27/2012
424	[redacted]	Knoxville	Tennessee	2/27/2012
425	[redacted]	blasdell	New York	2/27/2012
426	[redacted]	Bethesda	Maryland	2/27/2012
427	[redacted]	covington	Louisiana	2/27/2012
428	[redacted]	Salkum	Washington	2/27/2012
429	[redacted]	Chicago	Illinois	2/27/2012
430	[redacted]	Uvalde	Texas	2/27/2012
431	[redacted]	Jacksonville	Florida	2/27/2012
432	[redacted]	Novi	Michigan	2/27/2012
433	[redacted]	Peruibe		2/27/2012
434	[redacted]	Vacaville	California	2/27/2012
435	[redacted]	London Ont. Canada	California	2/27/2012
436	[redacted]	Maldegem	Armed Forces Pacific	2/27/2012
437	[redacted]	West Haverstraw	New York	2/27/2012
438	[redacted]	Portland	Oregon	2/27/2012
439	[redacted]	orange	California	2/27/2012
440	[redacted]	Highland	Illinois	2/27/2012
441	[redacted]	Sherwood	Arkansas	2/27/2012
442	[redacted]	Cary	North Carolina	2/27/2012
443	[redacted]	Newington	Connecticut	2/27/2012
444	[redacted]	Newark	Delaware	2/27/2012
445	[redacted]	Edinboro	Pennsylvania	2/27/2012
446	[redacted]	Washington	District Of Columbia	2/27/2012
447	[redacted]	Modesto	California	2/27/2012
448	[redacted]	Centreville	Virginia	2/27/2012
449	[redacted]	Mokena	Illinois	2/27/2012

	Name	City	State	Date
450	[redacted]	Bretnwood	New Hampshire	2/27/2012
451	[redacted]	Saint Louis	Missouri	2/27/2012
452	[redacted]	Chapel Hill	North Carolina	2/27/2012
453	[redacted]	Toronto	New York	2/27/2012
454	[redacted]	Aurora	Colorado	2/27/2012
455	[redacted]	Troutdale	Oregon	2/27/2012
456	[redacted]	Portland	Oregon	2/27/2012
457	[redacted]	Hayward	California	2/27/2012
458	[redacted]	New Oxford	Pennsylvania	2/27/2012
459	[redacted]	Lexington	Kentucky	2/27/2012
460	[redacted]	Woodside	New York	2/27/2012
461	[redacted]	Santa Rosa	California	2/27/2012
462	[redacted]	L.A.	California	2/27/2012
463	[redacted]	Wittmann	Arizona	2/27/2012
464	[redacted]	springfield	Illinois	2/27/2012
465	[redacted]	Houston	Texas	2/27/2012
466	[redacted]	Oxford	Florida	2/27/2012
467	[redacted]	Oak Lawn	Illinois	2/27/2012
468	[redacted]	Florissant	Missouri	2/27/2012
469	[redacted]	El Dorado	Arkansas	2/27/2012
470	[redacted]	Pleasant Garden	North Carolina	2/27/2012
471	[redacted]	Redwood City	California	2/27/2012
472	[redacted]	Palm Springs	California	2/27/2012
473	[redacted]	Phila.	Pennsylvania	2/27/2012
474	[redacted]	St. Paul	Minnesota	2/27/2012
475	[redacted]	Carlton	Oregon	2/27/2012
476	[redacted]	Bradenton	Florida	2/27/2012
477	[redacted]	denver	Colorado	2/27/2012
478	[redacted]	barling	Arkansas	2/27/2012
479	[redacted]	Chico	California	2/27/2012
480	[redacted]	Edinburg	Texas	2/27/2012
481	[redacted]	Flushing	New York	2/27/2012
482	[redacted]	Gretna	Louisiana	2/27/2012
483	[redacted]	Ft. Collins	Colorado	2/27/2012
484	[redacted]	ALTON	Illinois	2/27/2012
485	[redacted]	Hesperia	California	2/27/2012
486	[redacted]	Medford	Oregon	2/27/2012
487	[redacted]	Wenatchee	Washington	2/27/2012
488	[redacted]	West Milford	New Jersey	2/27/2012
489	[redacted]	Philadelphia	Pennsylvania	2/27/2012
490	[redacted]	Glen Rock	New Jersey	2/27/2012
491	[redacted]	Doylestown	Pennsylvania	2/27/2012
492	[redacted]	Mashpee	Massachusetts	2/27/2012
493	[redacted]	Oshkosh	Wisconsin	2/27/2012
494	[redacted]	Lewiston	New York	2/27/2012

	Name	City	State	Date
495	[redacted]	Seattle	Washington	2/27/2012
496	[redacted]	Gillett	Wisconsin	2/27/2012
497	[redacted]	blings	Montana	2/27/2012
498	[redacted]	Elmira	New York	2/27/2012
499	[redacted]	Las Vegas	Nevada	2/27/2012
500	[redacted]	westminster	California	2/27/2012
501	[redacted]	NEW YORK	New York	2/27/2012
502	[redacted]	Vancouver	California	2/27/2012
503	[redacted]	Calgary	California	2/27/2012
504	[redacted]	Portland	Oregon	2/27/2012
505	[redacted]	Detroit	Michigan	2/27/2012
506	[redacted]	San Antonio	Texas	2/27/2012
507	[redacted]	Rockport	Washington	2/27/2012
508	[redacted]	San Marcos	Texas	2/27/2012
509	[redacted]	winchester	Massachusetts	2/27/2012
510	[redacted]	morro bay	California	2/27/2012
511	[redacted]	Winnipeg		2/27/2012
512	[redacted]	Issaquah	Washington	2/27/2012
513	[redacted]	Tucson	Arizona	2/27/2012
514	[redacted]	San Rafael	California	2/27/2012
515	[redacted]	Sioux Falls	South Dakota	2/27/2012
516	[redacted]	St. Cloud	Minnesota	2/27/2012
517	[redacted]	San Anselmo	California	2/27/2012
518	[redacted]	Pescadero	California	2/27/2012
519	[redacted]	Pollock Pines	California	2/27/2012
520	[redacted]	Kenmore	Washington	2/27/2012
521	[redacted]	Leicester		2/27/2012
522	[redacted]	TACOMA	Washington	2/27/2012
523	[redacted]	Chelan	Washington	2/27/2012
524	[redacted]	Muskegon	Michigan	2/27/2012
525	[redacted]	Tacoma	Washington	2/27/2012
526	[redacted]	Sacramento	California	2/27/2012
527	[redacted]	Malvern	Pennsylvania	2/27/2012
528	[redacted]	Cockeysville	Maryland	2/27/2012
529	[redacted]	Chennai	Tennessee	2/27/2012
530	[redacted]	Livingston	Texas	2/27/2012
531	[redacted]	Wilmington	Delaware	2/27/2012
532	[redacted]	Moscow	Rhode Island	2/27/2012
533	[redacted]	Sherman Oaks	California	2/27/2012
534	[redacted]	Harrison	Arkansas	2/27/2012
535	[redacted]	Drl Rey Oaks	California	2/27/2012
536	[redacted]	San Mateo	California	2/27/2012
537	[redacted]	Pasay		2/27/2012
538	[redacted]	Granger	Indiana	2/27/2012
539	[redacted]	Bertamirans, Ames	Armed Forces Pacific	2/27/2012

	Name	City	State	Date
540	[redacted]	Austin	Texas	2/27/2012
541	[redacted]	Nandlstadt	Delaware	2/27/2012
542	[redacted]	Fremont	California	2/27/2012
543	[redacted]	Pensacola	Florida	2/27/2012
544	[redacted]	Santa Fe	New Mexico	2/27/2012
545	[redacted]	Downers Grove	Illinois	2/27/2012
546	[redacted]	Glendale	California	2/27/2012
547	[redacted]	Karachi		2/27/2012
548	[redacted]	Sacrofano	Virgin Islands	2/27/2012
549	[redacted]	durban		2/27/2012
550	[redacted]	Thonon les bains	Arizona	2/27/2012
551	[redacted]	Solna		2/27/2012
552	[redacted]	Greenville	South Carolina	2/27/2012
553	[redacted]	piraeus	Alaska	2/27/2012
554	[redacted]	Springfield	Missouri	2/27/2012
555	[redacted]	Ventura	California	2/27/2012
556	[redacted]	Durban North	Kentucky	2/27/2012
557	[redacted]	Wexford	Pennsylvania	2/27/2012
558	[redacted]	salerno	Illinois	2/27/2012
559	[redacted]	WrocÅ‚aw		2/27/2012
560	[redacted]	Hilo	Hawaii	2/27/2012
561	[redacted]	braga	Indiana	2/27/2012
562	[redacted]	Villa Park	Illinois	2/27/2012
563	[redacted]	Bremerton	Washington	2/27/2012
564	[redacted]	PITTSBURGH	Pennsylvania	2/27/2012
565	[redacted]	Grantham	New Hampshire	2/27/2012
566	[redacted]	Salem	Oregon	2/27/2012
567	[redacted]	houlton	Maine	2/27/2012
568	[redacted]	Humacao	Puerto Rico	2/27/2012
569	[redacted]	no. ferrisburgh	Vermont	2/27/2012
570	[redacted]	Basel		2/27/2012
571	[redacted]	Deep River	Connecticut	2/27/2012
572	[redacted]	Great Yarmouth		2/27/2012
573	[redacted]	Sintra		2/27/2012
574	[redacted]	Evergreen	Colorado	2/27/2012
575	[redacted]	Brier Hill	New York	2/27/2012
576	[redacted]	Naples	Florida	2/27/2012
577	[redacted]	Boise	Idaho	2/27/2012
578	[redacted]	Chatham	New York	2/27/2012
579	[redacted]	Waterford Works	New Jersey	2/27/2012
580	[redacted]	new york	New York	2/27/2012
581	[redacted]	Burdett	New York	2/27/2012
582	[redacted]	Orlando	Florida	2/27/2012
583	[redacted]	austin	Texas	2/27/2012
584	[redacted]	Clinton	Iowa	2/27/2012

	Name	City	State	Date
585	[redacted]	Stafford	Virginia	2/27/2012
586	[redacted]	Longmont	Colorado	2/27/2012
587	[redacted]	Jenkintown	Pennsylvania	2/27/2012
588	[redacted]	Staten Island	New York	2/27/2012
589	[redacted]	Allentown	Pennsylvania	2/27/2012
590	[redacted]	Flushing	New York	2/27/2012
591	[redacted]	Fredonia	New York	2/27/2012
592	[redacted]	Dawson	Iowa	2/27/2012
593	[redacted]	vico canavese	New York	2/27/2012
594	[redacted]	Springfield	Ohio	2/27/2012
595	[redacted]	Columbia	South Carolina	2/27/2012
596	[redacted]	Clifton Park	New York	2/27/2012
597	[redacted]	bennington	Vermont	2/27/2012
598	[redacted]	Winchester	Virginia	2/27/2012
599	[redacted]	New Brunswick	New Jersey	2/27/2012
600	[redacted]	Granby	Massachusetts	2/27/2012
601	[redacted]	New Brunswick	New Jersey	2/27/2012
602	[redacted]	Williston	Vermont	2/27/2012
603	[redacted]	McKeesport	Pennsylvania	2/27/2012
604	[redacted]	Hamilton Square	New Jersey	2/27/2012
605	[redacted]	St. Louis	Missouri	2/27/2012
606	[redacted]	Hackettstown	New Jersey	2/27/2012
607	[redacted]	Hackensack	New Jersey	2/27/2012
608	[redacted]	Lake Park	Florida	2/27/2012
609	[redacted]	Phoenix	Arizona	2/27/2012
610	[redacted]	Houston	Texas	2/27/2012
611	[redacted]	Myrtle Creek	Oregon	2/27/2012
612	[redacted]	Wheaton	Illinois	2/27/2012
613	[redacted]	west haven	Connecticut	2/27/2012
614	[redacted]	New York	New York	2/27/2012
615	[redacted]	jacksonville	Alabama	2/27/2012
616	[redacted]	Milwaukee	Wisconsin	2/27/2012
617	[redacted]	Larsen	Wisconsin	2/27/2012
618	[redacted]	Georgetown	Indiana	2/27/2012
619	[redacted]	so. milwaukee	Wisconsin	2/27/2012
620	[redacted]	Roma		2/27/2012
621	[redacted]	Rochester Hills	Michigan	2/27/2012
622	[redacted]	summerville	South Carolina	2/27/2012
623	[redacted]	high bridge	New Jersey	2/27/2012
624	[redacted]	lowell	Massachusetts	2/27/2012
625	[redacted]	Corpus Christi	Texas	2/27/2012
626	[redacted]	Florida	Massachusetts	2/27/2012
627	[redacted]	Murrieta	California	2/27/2012
628	[redacted]	Louisville	Kentucky	2/27/2012
629	[redacted]	casper	Wyoming	2/27/2012

	Name	City	State	Date
630	[redacted]	New Delhi, India	New York	2/27/2012
631	[redacted]	New York	New York	2/27/2012
632	[redacted]	Keyport	New Jersey	2/27/2012
633	[redacted]	Berkeley	California	2/27/2012
634	[redacted]	Lexington	Kentucky	2/27/2012
635	[redacted]	Cambridge	New York	2/27/2012
636	[redacted]	East Dundee	Illinois	2/27/2012
637	[redacted]	flemington	New Jersey	2/27/2012
638	[redacted]	Garden City	Kansas	2/27/2012
639	[redacted]	Sarasota	Florida	2/27/2012
640	[redacted]	Ojai	California	2/27/2012
641	[redacted]	Seattle	Washington	2/27/2012
642	[redacted]	Burien	Washington	2/27/2012
643	[redacted]	Valencia		2/27/2012
644	[redacted]	Jersey City	New Jersey	2/27/2012
645	[redacted]	Arlington	Virginia	2/27/2012
646	[redacted]	San Diego	California	2/27/2012
647	[redacted]	Chicago	Illinois	2/27/2012
648	[redacted]	VidebÃ¦k	Delaware	2/27/2012
649	[redacted]	Stuart	Florida	2/27/2012
650	[redacted]	HILTONHEAD	South Carolina	2/27/2012
651	[redacted]	Los Angeles	California	2/27/2012
652	[redacted]	Winnipeg, MB.	Florida	2/27/2012
653	[redacted]	New York	New York	2/27/2012
654	[redacted]	El Portal	Florida	2/27/2012
655	[redacted]	Astoria	Oregon	2/27/2012
656	[redacted]	Alhambra	California	2/27/2012
657	[redacted]	hunt. sta.	New York	2/27/2012
658	[redacted]	Miami	Florida	2/27/2012
659	[redacted]	New London	Connecticut	2/27/2012
660	[redacted]	Cambridge	Massachusetts	2/27/2012
661	[redacted]	Fords	New Jersey	2/27/2012
662	[redacted]	Onbekend	Nebraska	2/27/2012
663	[redacted]	Larwill	Indiana	2/27/2012
664	[redacted]	Beach Park	Illinois	2/27/2012
665	[redacted]	Brentwood	Tennessee	2/27/2012
666	[redacted]	Albany	New York	2/27/2012
667	[redacted]	Seattle	Washington	2/27/2012
668	[redacted]	Hightstown	New Jersey	2/27/2012
669	[redacted]	Santa Rosa	California	2/27/2012
670	[redacted]	Evans	Georgia	2/27/2012
671	[redacted]	Binghamton	New York	2/27/2012
672	[redacted]	Gelsenkirchen	Alabama	2/27/2012
673	[redacted]	San Diego	California	2/27/2012
674	[redacted]	Richboro	Pennsylvania	2/27/2012

	Name	City	State	Date
675	[redacted]	n	Illinois	2/27/2012
676	[redacted]	Claremont	California	2/27/2012
677	[redacted]	Sierra Vista	Arizona	2/27/2012
678	[redacted]	ithaca	New York	2/27/2012
679	[redacted]	aix en provence	Alabama	2/27/2012
680	[redacted]	Sierra Vista	Arizona	2/27/2012
681	[redacted]	Sarasota	Florida	2/27/2012
682	[redacted]	Mt Olive	Alabama	2/27/2012
683	[redacted]	Scottsdale	Arizona	2/27/2012
684	[redacted]	Monroeville	New Jersey	2/27/2012
685	[redacted]	Island Pk	New York	2/27/2012
686	[redacted]	Kalamazoo	Michigan	2/27/2012
687	[redacted]	Brookline	Massachusetts	2/27/2012
688	[redacted]	San Diego	California	2/27/2012
689	[redacted]	Lincoln	California	2/27/2012
690	[redacted]	Berea	Kentucky	2/27/2012
691	[redacted]	Cheboygan	Michigan	2/27/2012
692	[redacted]	hasselt		2/27/2012
693	[redacted]	Waynesburg	Pennsylvania	2/27/2012
694	[redacted]	Buffalo	New York	2/27/2012
695	[redacted]	Beckum	Delaware	2/27/2012
696	[redacted]	Winnetka	Illinois	2/27/2012
697	[redacted]	Chicago	Illinois	2/28/2012
698	[redacted]	Phoenix	Arizona	2/28/2012
699	[redacted]	Watervliet	New York	2/28/2012
700	[redacted]	LAS VEGAS	Nevada	2/28/2012
701	[redacted]	Tobyhanna	Pennsylvania	2/28/2012
702	[redacted]	Webster Groves	Missouri	2/28/2012
703	[redacted]	Ceres	California	2/28/2012
704	[redacted]	Charlottesville	Virginia	2/28/2012
705	[redacted]	stony point	New York	2/28/2012
706	[redacted]	Overland Park	Kansas	2/28/2012
707	[redacted]	Newark	Delaware	2/28/2012
708	[redacted]	Catania	Connecticut	2/28/2012
709	[redacted]	palermo		2/28/2012
710	[redacted]	Florissant	Missouri	2/28/2012
711	[redacted]	Bolivar	Missouri	2/28/2012
712	[redacted]	Havre	Montana	2/28/2012
713	[redacted]	Cleveland	Ohio	2/28/2012
714	[redacted]	Portland	Oregon	2/28/2012
715	[redacted]	Coquitlam	New York	2/28/2012
716	[redacted]	SCOTTSDALE	Arizona	2/28/2012
717	[redacted]	Grass Valley	California	2/28/2012
718	[redacted]	Nederland	Colorado	2/28/2012
719	[redacted]	Chula Vista	California	2/28/2012

	Name	City	State	Date
720	[redacted]	Plainfield	New Jersey	2/28/2012
721	[redacted]	Overland Park	Kansas	2/28/2012
722	[redacted]	Horton	Alabama	2/28/2012
723	[redacted]	portland	Oregon	2/28/2012
724	[redacted]	Poland	Indiana	2/28/2012
725	[redacted]	escondido	California	2/28/2012
726	[redacted]	Normal	Illinois	2/28/2012
727	[redacted]	Allison Park	Pennsylvania	2/28/2012
728	[redacted]	beaver falls	Pennsylvania	2/28/2012
729	[redacted]	Pomona	California	2/28/2012
730	[redacted]	Narberth	Pennsylvania	2/28/2012
731	[redacted]	Sandpoint	Idaho	2/28/2012
732	[redacted]	Portland	Oregon	2/28/2012
733	[redacted]	Tucson	Arizona	2/28/2012
734	[redacted]	Baldwin Park	California	2/28/2012
735	[redacted]	Ericeira	California	2/28/2012
736	[redacted]	Chattanooga	Tennessee	2/28/2012
737	[redacted]	New Rochelle	New York	2/28/2012
738	[redacted]	bradenton	Florida	2/28/2012
739	[redacted]	Cape Canaveral	Florida	2/28/2012
740	[redacted]	Ponte Vedra Beach	Florida	2/28/2012
741	[redacted]	New Brunswick	New Jersey	2/28/2012
742	[redacted]	Bergenfield	New Jersey	2/28/2012
743	[redacted]	Moorestown	New Jersey	2/28/2012
744	[redacted]	Middlesex	New Jersey	2/28/2012
745	[redacted]	Berkeley Hts	New Jersey	2/28/2012
746	[redacted]	Lodi	New Jersey	2/28/2012
747	[redacted]	Pine Brook	New Jersey	2/28/2012
748	[redacted]	Madison	New Jersey	2/28/2012
749	[redacted]	Paulsboro	New Jersey	2/28/2012
750	[redacted]	hewitt	New Jersey	2/28/2012
751	[redacted]	Barnegat	New Jersey	2/28/2012
752	[redacted]	Roselle	New Jersey	2/28/2012
753	[redacted]	Jackson	New Jersey	2/28/2012
754	[redacted]	Yardville	New Jersey	2/28/2012
755	[redacted]	Mount Laurel	New Jersey	2/28/2012
756	[redacted]	Westfield	New Jersey	2/28/2012
757	[redacted]	Clifton	New Jersey	2/28/2012
758	[redacted]	Madison	New Jersey	2/28/2012
759	[redacted]	Plainfield	New Jersey	2/28/2012
760	[redacted]	Sterling Heights	Michigan	2/28/2012
761	[redacted]	West Milford	New Jersey	2/28/2012
762	[redacted]	East Brunswick	New Jersey	2/28/2012
763	[redacted]	Kenilworth	New Jersey	2/28/2012
764	[redacted]	seattle	Washington	2/28/2012

	Name	City	State	Date
765	[redacted]	Takoma Park	Maryland	2/28/2012
766	[redacted]	Tenafly	New Jersey	2/28/2012
767	[redacted]	Cranford	New Jersey	2/28/2012
768	[redacted]	Blackwood	New Jersey	2/28/2012
769	[redacted]	miami	Florida	2/28/2012
770	[redacted]	Rutherford	New Jersey	2/28/2012
771	[redacted]	Mt. Arlington	New Jersey	2/28/2012
772	[redacted]	Higjland Park	New Jersey	2/28/2012
773	[redacted]	Woodcliff Lake	New Jersey	2/28/2012
774	[redacted]	Roselle Park	New Jersey	2/28/2012
775	[redacted]	Chevy Chase	Maryland	2/28/2012
776	[redacted]	Ringwood	New Jersey	2/28/2012
777	[redacted]	Long Branch	New Jersey	2/28/2012
778	[redacted]	Edison	New Jersey	2/28/2012
779	[redacted]	Rancho Viejo	Texas	2/28/2012
780	[redacted]	Jersey City	New Jersey	2/28/2012
781	[redacted]	Westfield	New Jersey	2/28/2012
782	[redacted]	Metuchen	New Jersey	2/28/2012
783	[redacted]	morganville	New Jersey	2/28/2012
784	[redacted]	Metuchen	New Jersey	2/28/2012
785	[redacted]	Hilo	Hawaii	2/28/2012
786	[redacted]	new york	New York	2/28/2012
787	[redacted]	East Brunswick	New Jersey	2/28/2012
788	[redacted]	Louisville	Kentucky	2/28/2012
789	[redacted]	Edison	New Jersey	2/28/2012
790	[redacted]	Edison	New Jersey	2/28/2012
791	[redacted]	RAMSEY	New Jersey	2/28/2012
792	[redacted]	Ringwood	New Jersey	2/28/2012
793	[redacted]	Edison	New Jersey	2/28/2012
794	[redacted]	edison	New Jersey	2/28/2012
795	[redacted]	edison	New Jersey	2/28/2012
796	[redacted]	Upper Saddle River	New Jersey	2/28/2012
797	[redacted]	Metuchen	New Jersey	2/28/2012
798	[redacted]	New Brunswick	New Jersey	2/28/2012
799	[redacted]	Edison	New Jersey	2/28/2012
800	[redacted]	Ringwood	New Jersey	2/28/2012
801	[redacted]	Edison	New Jersey	2/28/2012
802	[redacted]	New Brunswick	New Jersey	2/28/2012
803	[redacted]	New Brunswick	New Jersey	2/28/2012
804	[redacted]	Metuchen	New Jersey	2/28/2012
805	[redacted]	metuchen NJ	New Jersey	2/28/2012
806	[redacted]	Newark	New Jersey	2/28/2012
807	[redacted]	Highland Park	New Jersey	2/28/2012
808	[redacted]	Asbury Park	New Jersey	2/28/2012
809	[redacted]	Newton	New Jersey	2/28/2012

	Name	City	State	Date
810	[redacted]	Somerset	New Jersey	2/28/2012
811		edison	New Jersey	2/28/2012
812		new brunswick	New Jersey	2/28/2012
813		Twp. Of Washington	New Jersey	2/28/2012
814		Metuchen	New Jersey	2/28/2012
815		Medford	New Jersey	2/28/2012
816		Colonia	New Jersey	2/28/2012
817		Riverside	New Jersey	2/28/2012
818		Edison	New Jersey	2/28/2012
819		Forked River	New Jersey	2/28/2012
820		Ringwood	New Jersey	2/28/2012
821		Hamilton	New Jersey	2/28/2012
822		New Brunswick	New Jersey	2/28/2012
823		Flemington	New Jersey	2/28/2012
824		Sarasota	Florida	2/28/2012
825		hamilton	New Jersey	2/28/2012
826		Metuchen	New Jersey	2/28/2012
827		Bradley Beach	New Jersey	2/28/2012
828		Fort Collins	Colorado	2/28/2012
829		Constanta		2/28/2012
830		Monmouth Junction	New Jersey	2/28/2012
831		West New York	New Jersey	2/28/2012
832		Hewitt	New Jersey	2/28/2012
833		Carteret	New Jersey	2/28/2012
834		Upper Montclair	New Jersey	2/28/2012
835		Fords	New Jersey	2/28/2012
836		South Plainfield	New Jersey	2/28/2012
837		Suffern	New York	2/28/2012
838		metuchen	New Jersey	2/28/2012
839		cincinnati	Ohio	2/28/2012
840		Edison	New Jersey	2/28/2012
841		thunder bay	Armed Forces Pacific	2/28/2012
842		San Francisco	California	2/28/2012
843		Somerset	New Jersey	2/28/2012
844		Las Vegas	Nevada	2/28/2012
845		Dunellen	New Jersey	2/28/2012
846		Hewitt	New Jersey	2/28/2012
847		Hamilton	New Jersey	2/28/2012
848		Trieste	Iowa	2/28/2012
849		Ulm	Delaware	2/28/2012
850		Union	Kentucky	2/28/2012
851		Edison	New Jersey	2/28/2012
852		MEXICO	Armed Forces Pacific	2/28/2012
853		Charlotte	North Carolina	2/28/2012
854		tenafly	New Jersey	2/28/2012

	Name	City	State	Date
855	[redacted]	Riverton	New Jersey	2/28/2012
856		Naples	Florida	2/28/2012
857		Piscataway	New Jersey	2/28/2012
858		New York	New York	2/28/2012
859		Stuart	Florida	2/28/2012
860		Maplewood	New Jersey	2/28/2012
861		New Haven	Connecticut	2/28/2012
862		Madison	Wisconsin	2/28/2012
863		Allentown	Pennsylvania	2/28/2012
864		Boalsburg	Pennsylvania	2/28/2012
865		Reseda	California	2/28/2012
866		Edison	New Jersey	2/28/2012
867		somerset	New Jersey	2/28/2012
868		South Park	Pennsylvania	2/28/2012
869		Rancho Palos Verdes	California	2/28/2012
870		Hillsboro	Oregon	2/28/2012
871		Atlanta	Georgia	2/28/2012
872		Richboro	Pennsylvania	2/28/2012
873		Paradise	Michigan	2/28/2012
874		New Brunswick	New Jersey	2/28/2012
875		sf	California	2/28/2012
876		iselin	New Jersey	2/28/2012
877		Iowa City	Iowa	2/28/2012
878		Edison	New Jersey	2/28/2012
879		Saint Louis	Missouri	2/28/2012
880		New York	New York	2/28/2012
881		Monmouth Junction	New Jersey	2/28/2012
882		Raritan	New Jersey	2/28/2012
883		Santa Fe	New Mexico	2/28/2012
884		Westfield	New Jersey	2/28/2012
885		Edison	New Jersey	2/28/2012
886		East Rutherford	New Jersey	2/28/2012
887		princeton	New Jersey	2/28/2012
888		Guelph, Ontario	Canada	2/28/2012
889		Oakland	California	2/28/2012
890		Talent	Oregon	2/28/2012
891		Montclair	New Jersey	2/28/2012
892		Ogdensburg	New York	2/28/2012
893		Chicago	Illinois	2/28/2012
894		Edison	New Jersey	2/28/2012
895		Linden	New Jersey	2/28/2012
896		Teaneck	New Jersey	2/28/2012
897		New Brunswick	New Jersey	2/28/2012
898		Old Bridge	New Jersey	2/28/2012
899		Ojai	California	2/28/2012

	Name	City	State	Date
900	[redacted]	Dover	New Jersey	2/29/2012
901	[redacted]	Butler	New Jersey	2/29/2012
902	[redacted]	Knoxville	Tennessee	2/29/2012
903	[redacted]	Somerset	New Jersey	2/29/2012
904	[redacted]	Roma		2/29/2012
905	[redacted]	Cresskill	New Jersey	2/29/2012
906	[redacted]	New York	New York	2/29/2012
907	[redacted]	Edison	New Jersey	2/29/2012
908	[redacted]	Madison	New Jersey	2/29/2012
909	[redacted]	Mahwah	New Jersey	2/29/2012
910	[redacted]	Long Valley	New Jersey	2/29/2012
911	[redacted]	Saratoga	California	2/29/2012
912	[redacted]	new brunswick	New Jersey	2/29/2012
913	[redacted]	Hillsborough	New Jersey	2/29/2012
914	[redacted]	Fullerton	California	2/29/2012
915	[redacted]	Bloomington	Minnesota	2/29/2012
916	[redacted]	Oakland	California	2/29/2012
917	[redacted]	New Milford	New Jersey	2/29/2012
918	[redacted]	Jersey City	New Jersey	2/29/2012
919	[redacted]	Point Pleasant	New Jersey	2/29/2012
920	[redacted]	San Francisco	California	2/29/2012
921	[redacted]	Piscataway	New Jersey	2/29/2012
922	[redacted]	Metuchen	New Jersey	2/29/2012
923	[redacted]	huntington	New York	2/29/2012
924	[redacted]	Princeton	New Jersey	2/29/2012
925	[redacted]	Costa Mesa	California	2/29/2012
926	[redacted]	Winston	Georgia	2/29/2012
927	[redacted]	phoenix	Arizona	2/29/2012
928	[redacted]	Brooklyn	New York	2/29/2012
929	[redacted]	Madeira Beach	Florida	2/29/2012
930	[redacted]	Ringwood	New Jersey	2/29/2012
931	[redacted]	Cliffside Park	New Jersey	2/29/2012
932	[redacted]	Pompton Plains	New Jersey	2/29/2012
933	[redacted]	East Hampton	New York	2/29/2012
934	[redacted]	Milltown	New Jersey	2/29/2012
935	[redacted]	Oulu		2/29/2012
936	[redacted]	Kansas City	Missouri	2/29/2012
937	[redacted]	Basking Ridge	New Jersey	2/29/2012
938	[redacted]	Oxford	Ohio	2/29/2012
939	[redacted]	S Plainfield	New Jersey	2/29/2012
940	[redacted]	Ithaca	New York	2/29/2012
941	[redacted]	Milltown	New Jersey	2/29/2012
942	[redacted]	Erie	Pennsylvania	2/29/2012
943	[redacted]	Gresham	Oregon	2/29/2012
944	[redacted]	Philadelphia	Pennsylvania	2/29/2012

	Name	City	State	Date
945	[redacted]	Union	New Jersey	2/29/2012
946	[redacted]	Piscataway	New Jersey	2/29/2012
947	[redacted]	Ocean Springs	Mississippi	2/29/2012
948	[redacted]	Piscataway	New Jersey	2/29/2012
949	[redacted]	Glenwood	New Jersey	2/29/2012
950	[redacted]	Colonia	New Jersey	2/29/2012
951	[redacted]	Amsterdam		2/29/2012
952	[redacted]	Morris Plains	New Jersey	2/29/2012
953	[redacted]	Berkeley Heights	New Jersey	2/29/2012
954	[redacted]	sparta	New Jersey	2/29/2012
955	[redacted]	Brighon	Massachusetts	2/29/2012
956	[redacted]	Westminster	California	2/29/2012
957	[redacted]	ringwood	New Jersey	2/29/2012
958	[redacted]	milan	Virginia	2/29/2012
959	[redacted]	Chesapeake	Virginia	2/29/2012
960	[redacted]	Ringwood	New Jersey	2/29/2012
961	[redacted]	Metuchen	New Jersey	2/29/2012
962	[redacted]	Piscataway	New Jersey	2/29/2012
963	[redacted]	Pulaski	Virginia	2/29/2012
964	[redacted]	Edison	New Jersey	2/29/2012
965	[redacted]	Belvidere	Illinois	2/29/2012
966	[redacted]	New York	New York	2/29/2012
967	[redacted]	Manville	New Jersey	2/29/2012
968	[redacted]	Cygnet	Ohio	2/29/2012
969	[redacted]	santa monica	California	2/29/2012
970	[redacted]	new brunswick	New Jersey	2/29/2012
971	[redacted]	barneveld	New York	2/29/2012
972	[redacted]	Kimberly	Alabama	2/29/2012
973	[redacted]	South River	New Jersey	2/29/2012
974	[redacted]	colonia	New Jersey	2/29/2012
975	[redacted]	pawtucket	Rhode Island	2/29/2012
976	[redacted]	Stuart	Florida	2/29/2012
977	[redacted]	farnborough		2/29/2012
978	[redacted]	Edison	New Jersey	2/29/2012
979	[redacted]	Edison	New Jersey	2/29/2012
980	[redacted]	Bloomfield	New Jersey	2/29/2012
981	[redacted]	baker	Oregon	2/29/2012
982	[redacted]	Brooklyn	New York	2/29/2012
983	[redacted]	Vienna		2/29/2012
984	[redacted]	Steuben	Maine	2/29/2012
985	[redacted]	Monmouth Junction	New Jersey	2/29/2012
986	[redacted]	Justice	Illinois	2/29/2012
987	[redacted]	dayton	New Jersey	2/29/2012
988	[redacted]	Parlin	New Jersey	2/29/2012
989	[redacted]	Santa Cruz	California	2/29/2012

	Name	City	State	Date
990	[redacted]	lancaster	California	2/29/12
991	[redacted]	Garfield Hts. Ohio	Alabama	2/29/12
992	[redacted]	Sonoma	California	2/29/12
993	[redacted]	Raamsdonksveer		2/29/12
994	[redacted]	Mahwah	New Jersey	2/29/12
995	[redacted]	Lewisville	Texas	2/29/12
996	[redacted]	Brooklyn	New York	2/29/12
997	[redacted]	ilford	Armed Forces	2/29/12
998	[redacted]	jacksonville	Florida	2/29/12
999	[redacted]	Edison	New Jersey	2/29/12
1000	[redacted]	Lady Lake	Florida	2/29/12
1001	[redacted]	Edison	New Jersey	2/29/12
1002	[redacted]	Nelson	New Hampshire	2/29/12
1003	[redacted]	Santa Barbara	California	2/29/12
1004	[redacted]	Kettering	Ohio	2/29/12
1005	[redacted]	Franklin	Tennessee	2/29/12
1006	[redacted]	San Jose	California	2/29/12
1007	[redacted]	Piscataway	New Jersey	2/29/12
1008	[redacted]	Union	New Jersey	2/29/12
1009	[redacted]	grosse pointe	Michigan	2/29/12
1010	[redacted]	Warren	Ohio	2/29/12
1011	[redacted]	Leander	Texas	2/29/12
1012	[redacted]	Fort Bragg	California	2/29/12
1013	[redacted]	Jamestown	New York	2/29/12
1014	[redacted]	San Juan	Puerto Rico	2/29/12
1015	[redacted]	Fort Madison	Iowa	2/29/12
1016	[redacted]	New York	New York	2/29/12
1017	[redacted]	Madison	Wisconsin	2/29/12
1018	[redacted]	High Pt.	North Carolina	2/29/12
1019	[redacted]	Rancho Mirage	California	2/29/12
1020	[redacted]	GARDEN CITY	Kansas	2/29/12
1021	[redacted]	clidton	New Jersey	2/29/12
1022	[redacted]	Roseland	New Jersey	2/29/12
1023	[redacted]	Durham	North Carolina	2/29/12
1024	[redacted]	Foley	Alabama	2/29/12
1025	[redacted]	Crestone	Colorado	2/29/12
1026	[redacted]	Mine Hill	New Jersey	2/29/12
1027	[redacted]	west haven	Connecticut	2/29/12
1028	[redacted]	Los Angeles	California	2/29/12
1029	[redacted]	NY	New York	2/29/12
1030	[redacted]	Rosemont	Pennsylvania	2/29/12
1031	[redacted]	New York	New York	2/29/12
1032	[redacted]	Williamsville	New York	2/29/12
1033	[redacted]	Groton	Connecticut	2/29/12
1034	[redacted]	San Antonio	Texas	2/29/12

	Name	City	State	Date
1035	[redacted]	New Brighton	Minnesota	2/29/12
1036	[redacted]	brooklyn	New York	2/29/12
1037	[redacted]	Albuquerque	New Mexico	2/29/12
1038	[redacted]	Beaverton	Oregon	2/29/12
1039	[redacted]	Prescott Valley	Arizona	2/29/12
1040	[redacted]	Knoxville	Tennessee	2/29/12
1041	[redacted]	rogersville	Tennessee	2/29/12
1042	[redacted]	Lakewood ranch	Florida	2/29/12
1043	[redacted]	Nashua	New Hampshire	2/29/12
1044	[redacted]	paradise	Michigan	2/29/12
1045	[redacted]	New Brunswick	New Jersey	2/29/12
1046	[redacted]	Louisville	Kentucky	2/29/12
1047	[redacted]	Milano	Virginia	2/29/12
1048	[redacted]	Scottsdale	Arizona	2/29/12
1049	[redacted]	Portland	Oregon	2/29/12
1050	[redacted]	Edison	New Jersey	2/29/12
1051	[redacted]	Middlesex	New Jersey	2/29/12
1052	[redacted]	Riverside	Illinois	2/29/12
1053	[redacted]	syracuse	New York	2/29/12
1054	[redacted]	san jose	California	2/29/12
1055	[redacted]	Tucson	Arizona	2/29/12
1056	[redacted]	Riverside	California	2/29/12
1057	[redacted]	Valley Glen	California	2/29/12
1058	[redacted]	Mendon	Massachusetts	2/29/12
1059	[redacted]	WELLS	Maine	2/29/12
1060	[redacted]	Clifton	New Jersey	2/29/12
1061	[redacted]	Hempstead	New York	2/29/12
1062	[redacted]	Chandler	Arizona	2/29/12
1063	[redacted]	Aurora	Colorado	3/1/12
1064	[redacted]	New Providence	New Jersey	3/1/12
1065	[redacted]	Milwaukee	Wisconsin	3/1/12
1066	[redacted]	Englewood	Tennessee	3/1/12
1067	[redacted]	Vimodrone		3/1/12
1068	[redacted]	Brooklyn	Ohio	3/1/12
1069	[redacted]	Goshen	Connecticut	3/1/12
1070	[redacted]	rockville	Maryland	3/1/12
1071	[redacted]	Chippewa Falls	Wisconsin	3/1/12
1072	[redacted]	waikoloa	Hawaii	3/1/12
1073	[redacted]	Reno	Nevada	3/1/12
1074	[redacted]	Elk Grove	California	3/1/12
1075	[redacted]	Edison	New Jersey	3/1/12
1076	[redacted]	GREEDFIELD	Wisconsin	3/1/12
1077	[redacted]	Carson City	Nevada	3/1/12
1078	[redacted]	la selva beach	California	3/1/12
1079	[redacted]	Thousand Oaks	California	3/1/12

	Name	City	State	Date
1080	[redacted]	Brentwood	California	3/1/12
1081	[redacted]	wheat ridge	Colorado	3/1/12
1082	[redacted]	TULSA	Oklahoma	3/1/12
1083	[redacted]	Philadelphia	Pennsylvania	3/1/12
1084	[redacted]	WEST SACRAMENTO	California	3/1/12
1085	[redacted]	Louisville	Colorado	3/1/12
1086	[redacted]	Ashland	Oregon	3/1/12
1087	[redacted]	Frederick	Maryland	3/1/12
1088	[redacted]	Slidell	Louisiana	3/1/12
1089	[redacted]	Colorado Springs	Colorado	3/1/12
1090	[redacted]	Lake Havasu City	Arizona	3/1/12
1091	[redacted]	Brooklyn	New York	3/1/12
1092	[redacted]	Bethune	South Carolina	3/1/12
1093	[redacted]	Bridgewater	New Jersey	3/1/12
1094	[redacted]	paramus	New Jersey	3/1/12
1095	[redacted]	Seattle	Washington	3/1/12
1096	[redacted]	teaneck	New Jersey	3/1/12
1097	[redacted]	Buda	Texas	3/1/12
1098	[redacted]	Santa Rosa	California	3/1/12
1099	[redacted]	Summer Shade	Kentucky	3/1/12
1100	[redacted]	Bergenfield	New Jersey	3/1/12
1101	[redacted]	Astoria	Oregon	3/1/12
1102	[redacted]	pompton lakes	New Jersey	3/1/12
1103	[redacted]	Santa BArbara	California	3/1/12
1104	[redacted]	Greensburg	Pennsylvania	3/1/12
1105	[redacted]	LA	California	3/1/12
1106	[redacted]	Roma	Texas	3/1/12
1107	[redacted]	High Bridge	New Jersey	3/1/12
1108	[redacted]	Southfield	Michigan	3/1/12
1109	[redacted]	Auckland	Kansas	3/1/12
1110	[redacted]	Bergenfield	New Jersey	3/1/12
1111	[redacted]	Wylie	Texas	3/1/12
1112	[redacted]	Toms River	New Jersey	3/1/12
1113	[redacted]	Pompton Lakes	New Jersey	3/1/12
1114	[redacted]	nanticoke	Pennsylvania	3/1/12
1115	[redacted]	Neptune	New Jersey	3/1/12
1116	[redacted]	Oaklyn	New Jersey	3/1/12
1117	[redacted]	edison	New Jersey	3/1/12
1118	[redacted]	LENEXA	Kansas	3/1/12
1119	[redacted]	Humble	Texas	3/1/12
1120	[redacted]	Comer	Georgia	3/1/12
1121	[redacted]	glenview	Illinois	3/1/12
1122	[redacted]	South Plainfield	New Jersey	3/1/12
1123	[redacted]	Long Pond	Pennsylvania	3/1/12
1124	[redacted]	EDISON	New Jersey	3/1/12

	Name	City	State	Date
1125	[redacted]	Elk Grove Village	Illinois	3/1/12
1126	[redacted]	LAWRENCE	Pennsylvania	3/1/12
1127	[redacted]	Green Brook	New Jersey	3/1/12
1128	[redacted]	Sun City	California	3/1/12
1129	[redacted]	EHT	New Jersey	3/1/12
1130	[redacted]	Asheville	North Carolina	3/1/12
1131	[redacted]	Verona	New Jersey	3/1/12
1132	[redacted]	Kalamazoo	Michigan	3/1/12
1133	[redacted]	Grawn	Michigan	3/1/12
1134	[redacted]	Minneapolis	Minnesota	3/1/12
1135	[redacted]	Albox	New Mexico	3/1/12
1136	[redacted]	Salisbury	North Carolina	3/1/12
1137	[redacted]	North Huntingdon	Pennsylvania	3/1/12
1138	[redacted]	Millsap	Texas	3/1/12
1139	[redacted]	Union	New Jersey	3/1/12
1140	[redacted]	baghdad		3/1/12
1141	[redacted]	Vista	California	3/1/12
1142	[redacted]	Asbury	New Jersey	3/1/12
1143	[redacted]	west palm beach	Florida	3/1/12
1144	[redacted]	West Palm Beach	Florida	3/1/12
1145	[redacted]	Venice	Florida	3/1/12
1146	[redacted]	Budapest	Hawaii	3/1/12
1147	[redacted]	West Milford	New Jersey	3/1/12
1148	[redacted]	old bridge	New Jersey	3/1/12
1149	[redacted]	Woodstock	New York	3/1/12
1150	[redacted]	Beverly	New Jersey	3/1/12
1151	[redacted]	mtlauel	New Jersey	3/1/12
1152	[redacted]	Williamstown	New Jersey	3/1/12
1153	[redacted]	Cedar Park	Texas	3/1/12
1154	[redacted]	Bound Brook	New Jersey	3/1/12
1155	[redacted]	tarxien	Idaho	3/1/12
1156	[redacted]	Orlando	Florida	3/1/12
1157	[redacted]	Chicago	Illinois	3/1/12
1158	[redacted]	San Jose	California	3/1/12
1159	[redacted]	Bayside Hills	New York	3/1/12
1160	[redacted]	Mount Laurel	New Jersey	3/1/12
1161	[redacted]	North Haledon	New Jersey	3/1/12
1162	[redacted]	Santa Fe	New Mexico	3/1/12
1163	[redacted]	Albuquerque	New Mexico	3/1/12
1164	[redacted]	Fords	New Jersey	3/1/12
1165	[redacted]	Hanford	California	3/2/12
1166	[redacted]	edison	New Jersey	3/2/12
1167	[redacted]	Eagan	Minnesota	3/2/12
1168	[redacted]	Sparta	New Jersey	3/2/12
1169	[redacted]	Sparta	New Jersey	3/2/12

	Name	City	State	Date
1170	[redacted]	Harrisburg	Pennsylvania	3/2/12
1171	[redacted]	Martinsville	Indiana	3/2/12
1172	[redacted]	troy	Pennsylvania	3/2/12
1173	[redacted]	Robbinsville	New Jersey	3/2/12
1174	[redacted]	Wellington	Florida	3/2/12
1175	[redacted]	Westfield	New Jersey	3/2/12
1176	[redacted]	Albany	Oregon	3/2/12
1177	[redacted]	Blacksburg	Virginia	3/2/12
1178	[redacted]	mogliano veneto	Georgia	3/2/12
1179	[redacted]	Aurora	Illinois	3/2/12
1180	[redacted]	Hillsdale	New Jersey	3/2/12
1181	[redacted]	LA CELLE SUR MORIN	Florida	3/2/12
1182	[redacted]	Stone Mountain	Georgia	3/2/12
1183	[redacted]	Edison	New Jersey	3/2/12
1184	[redacted]	Bridgewater	New Jersey	3/2/12
1185	[redacted]	bORSBEEK	Alabama	3/2/12
1186	[redacted]	Springfield	New Jersey	3/2/12
1187	[redacted]	New Brunswick	New Jersey	3/2/12
1188	[redacted]	Montclair	New Jersey	3/2/12
1189	[redacted]	brick	New Jersey	3/2/12
1190	[redacted]	Blackwood	New Jersey	3/2/12
1191	[redacted]	Stuart	Virginia	3/2/12
1192	[redacted]	Manitou Springs	Colorado	3/2/12
1193	[redacted]	Potomac Falls	Virginia	3/2/12
1194	[redacted]	Hawthorne	New Jersey	3/2/12
1195	[redacted]	Millburn Twp	New Jersey	3/2/12
1196	[redacted]	Oakland	New Jersey	3/2/12
1197	[redacted]	West Milford	New Jersey	3/2/12
1198	[redacted]	Roosevelt	New Jersey	3/2/12
1199	[redacted]	Highlands	New Jersey	3/2/12
1200	[redacted]	Ridgewood	New Jersey	3/2/12
1201	[redacted]	Milford	New Jersey	3/2/12
1202	[redacted]	Edison	New Jersey	3/2/12
1203	[redacted]	pompton lakes	New Jersey	3/2/12
1204	[redacted]	Edison	New Jersey	3/2/12
1205	[redacted]	Cranford	New Jersey	3/2/12
1206	[redacted]	Rahway	New Jersey	3/2/12
1207	[redacted]	Jersey City	New Jersey	3/2/12
1208	[redacted]	Millville	New Jersey	3/2/12
1209	[redacted]	pointplesantbeach	New Jersey	3/2/12
1210	[redacted]	morganville	New Jersey	3/2/12
1211	[redacted]	Hillsborough	New Jersey	3/2/12
1212	[redacted]	Edison	New Jersey	3/2/12
1213	[redacted]	Wayne	New Jersey	3/2/12
1214	[redacted]	Hawthorne	New Jersey	3/2/12

	Name	City	State	Date
1215	[redacted]	Chatham	New Jersey	3/2/12
1216	[redacted]	Ringwood	New Jersey	3/2/12
1217	[redacted]	Newton	Massachusetts	3/2/12
1218	[redacted]	edison	New Jersey	3/2/12
1219	[redacted]	South Amboy	New Jersey	3/2/12
1220	[redacted]	Toms River	New Jersey	3/2/12
1221	[redacted]	Lincoln Park	New Jersey	3/2/12
1222	[redacted]	Neshanic Station	New Jersey	3/2/12
1223	[redacted]	Jersey City	New Jersey	3/2/12
1224	[redacted]	Fort Lee	New Jersey	3/2/12
1225	[redacted]	westmont	New Jersey	3/2/12
1226	[redacted]	North Plainfield	New Jersey	3/2/12
1227	[redacted]	Bergenfield	New Jersey	3/2/12
1228	[redacted]	Wayne	New Jersey	3/2/12
1229	[redacted]	Woodland Park	New Jersey	3/2/12
1230	[redacted]	Jackson	New Jersey	3/2/12
1231	[redacted]	Rahway	New Jersey	3/2/12
1232	[redacted]	North Brunswick	New Jersey	3/2/12
1233	[redacted]	Pompton Lakes	New Jersey	3/2/12
1234	[redacted]	Milmay	New Jersey	3/2/12
1235	[redacted]	Newark	New Jersey	3/2/12
1236	[redacted]	Bloomingdale	New Jersey	3/2/12
1237	[redacted]	kinnelon	New Jersey	3/2/12
1238	[redacted]	Maplewood	New Jersey	3/2/12
1239	[redacted]	Fair Lawn	New Jersey	3/2/12
1240	[redacted]	Lawrenceville	New Jersey	3/2/12
1241	[redacted]	Westfield	New Jersey	3/2/12
1242	[redacted]	Jackson	New Jersey	3/2/12
1243	[redacted]	Bound Brook	New Jersey	3/2/12
1244	[redacted]	Perth Amboy	New Jersey	3/2/12
1245	[redacted]	West Long Branch	New Jersey	3/2/12
1246	[redacted]	Ringwood	New Jersey	3/2/12
1247	[redacted]	salt lake city	Utah	3/2/12
1248	[redacted]	Saddle Brook	New Jersey	3/2/12
1249	[redacted]	Sewaren	New Jersey	3/2/12
1250	[redacted]	APODACA	Texas	3/2/12
1251	[redacted]	Newark	New Jersey	3/2/12
1252	[redacted]	Edison	New Jersey	3/2/12
1253	[redacted]	Wayne	New Jersey	3/2/12
1254	[redacted]	New Brunswick	New Jersey	3/2/12
1255	[redacted]	Vineland	New Jersey	3/2/12
1256	[redacted]	Highland Park	New Jersey	3/2/12
1257	[redacted]	Metuchen	New Jersey	3/2/12
1258	[redacted]	red bank	New Jersey	3/3/12
1259	[redacted]	Glen Gardner	New Jersey	3/3/12

	Name	City	State	Date
1260	[redacted]	Washington	New Jersey	3/3/12
1261	[redacted]	Chatham	New Jersey	3/3/12
1262	[redacted]	Carteret	New Jersey	3/3/12
1263	[redacted]	South Plainfield	New Jersey	3/3/12
1264	[redacted]	Monroe twp	New Jersey	3/3/12
1265	[redacted]	edison	New Jersey	3/3/12
1266	[redacted]	Ridgewood	New Jersey	3/3/12
1267	[redacted]	North Bergen	New Jersey	3/3/12
1268	[redacted]	Wayne	New Jersey	3/3/12
1269	[redacted]	North Plainfield	New Jersey	3/3/12
1270	[redacted]	Bradley Beach	New Jersey	3/3/12
1271	[redacted]	Cedr Run	New Jersey	3/3/12
1272	[redacted]	bloomingdale	New Jersey	3/3/12
1273	[redacted]	Long Beach Twp.	New Jersey	3/3/12
1274	[redacted]	Morristown	New Jersey	3/3/12
1275	[redacted]	Martinsville	New Jersey	3/3/12
1276	[redacted]	clementon	New Jersey	3/3/12
1277	[redacted]	Tenafly	New Jersey	3/3/12
1278	[redacted]	Bound Brook	New Jersey	3/3/12
1279	[redacted]	Monmouth Jct	New Jersey	3/3/12
1280	[redacted]	Brick	New Jersey	3/3/12
1281	[redacted]	Edison	New Jersey	3/3/12
1282	[redacted]	Hazllet	New Jersey	3/3/12
1283	[redacted]	El Paso	Texas	3/3/12
1284	[redacted]	Edison	New Jersey	3/3/12
1285	[redacted]	East Brunswick	New Jersey	3/3/12
1286	[redacted]	Edison	New Jersey	3/3/12
1287	[redacted]	edison	New Jersey	3/3/12
1288	[redacted]	Wayne	New Jersey	3/3/12
1289	[redacted]	Red Bank	New Jersey	3/3/12
1290	[redacted]	Paramus	New Jersey	3/3/12
1291	[redacted]	Somerset	New Jersey	3/3/12
1292	[redacted]	Manahawkin	New Jersey	3/3/12
1293	[redacted]	Berkeley Heights	New Jersey	3/3/12
1294	[redacted]	Stockholm	New Jersey	3/3/12
1295	[redacted]	closter	New Jersey	3/3/12
1296	[redacted]	Wanaque	New Jersey	3/3/12
1297	[redacted]	Egg Harbor Twp.	New Jersey	3/3/12
1298	[redacted]	New York	New York	3/3/12
1299	[redacted]	Gainesville	Florida	3/3/12
1300	[redacted]	new brunswick	New Jersey	3/3/12
1301	[redacted]	dumont	New Jersey	3/3/12
1302	[redacted]	Highland Park	New Jersey	3/3/12
1303	[redacted]	Lambertville	New Jersey	3/3/12
1304	[redacted]	North Plainfield	New Jersey	3/3/12

	Name	City	State	Date
1305	[redacted]	Chester	New Jersey	3/3/12
1306	[redacted]	Long Branch	New Jersey	3/3/12
1307	[redacted]	Gloucester	New Jersey	3/3/12
1308	[redacted]	East Orange	New Jersey	3/3/12
1309	[redacted]	Clifton	New Jersey	3/3/12
1310	[redacted]	Rahway	New Jersey	3/3/12
1311	[redacted]	edison	New Jersey	3/3/12
1312	[redacted]	Kihei	Hawaii	3/3/12
1313	[redacted]	Edison	New Jersey	3/3/12
1314	[redacted]	Monroe Twp.	New Jersey	3/3/12
1315	[redacted]	Hoboken	New Jersey	3/3/12
1316	[redacted]	Long Branch	New Jersey	3/3/12
1317	[redacted]	Manalapan	New Jersey	3/3/12
1318	[redacted]	Union	New Jersey	3/3/12
1319	[redacted]	Pompton Lakes	New Jersey	3/3/12
1320	[redacted]	Oceanport	New Jersey	3/3/12
1321	[redacted]	Wyckoff	New Jersey	3/3/12
1322	[redacted]	Marlboro	New Jersey	3/3/12
1323	[redacted]	Plainfield	New Jersey	3/3/12
1324	[redacted]	edison	New Jersey	3/3/12
1325	[redacted]	Norwich	Connecticut	3/3/12
1326	[redacted]	Manalapan	New Jersey	3/3/12
1327	[redacted]	Metuchen	New Jersey	3/3/12
1328	[redacted]	Fair Lawn	New Jersey	3/3/12
1329	[redacted]	Franklin	New Jersey	3/3/12
1330	[redacted]	Edison	New Jersey	3/3/12
1331	[redacted]	Jersey City	New Jersey	3/3/12
1332	[redacted]	Medford lakes	New Jersey	3/3/12
1333	[redacted]	iselin	New Jersey	3/3/12
1334	[redacted]	Edison	New Jersey	3/3/12
1335	[redacted]	Edison	New Jersey	3/3/12
1336	[redacted]	Franklin Park	New Jersey	3/3/12
1337	[redacted]	Phoenix	Arizona	3/3/12
1338	[redacted]	Metuchen	New Jersey	3/3/12
1339	[redacted]	Long Branch	New Jersey	3/3/12
1340	[redacted]	Sea Bright	New Jersey	3/3/12
1341	[redacted]	waretown	New Jersey	3/3/12
1342	[redacted]	Nutley	New Jersey	3/3/12
1343	[redacted]	Landrum	South Carolina	3/3/12
1344	[redacted]	Brighton	Colorado	3/3/12
1345	[redacted]	wyckoff	New Jersey	3/3/12
1346	[redacted]	miami	Florida	3/3/12
1347	[redacted]	medford lakes	New Jersey	3/3/12
1348	[redacted]	Glen Gardner	New Jersey	3/3/12
1349	[redacted]	Iselin	New Jersey	3/3/12

	Name	City	State	Date
1350	[redacted]	Ewing	New Jersey	3/3/12
1351	[redacted]	Butler	New Jersey	3/3/12
1352	[redacted]	Edison	New Jersey	3/3/12
1353	[redacted]	Brick	New Jersey	3/3/12
1354	[redacted]	chatham	New Jersey	3/3/12
1355	[redacted]	Brick	New Jersey	3/3/12
1356	[redacted]	South Bound Brook	New Jersey	3/3/12
1357	[redacted]	South Bound Brook	New Jersey	3/3/12
1358	[redacted]	Ocean Grove	New Jersey	3/3/12
1359	[redacted]	Edison	New Jersey	3/3/12
1360	[redacted]	Morristown	New Jersey	3/3/12
1361	[redacted]	Edison	New Jersey	3/3/12
1362	[redacted]	Prospect	Kentucky	3/3/12
1363	[redacted]	Auckland		3/3/12
1364	[redacted]	Sayreville	New Jersey	3/3/12
1365	[redacted]	Ringwood	New Jersey	3/3/12
1366	[redacted]	North Brunswick	New Jersey	3/3/12
1367	[redacted]	Yardley	Pennsylvania	3/3/12
1368	[redacted]	Englewood	New Jersey	3/4/12
1369	[redacted]	Beacon Falls	Connecticut	3/4/12
1370	[redacted]	Bound Brook	New Jersey	3/4/12
1371	[redacted]	Morristown	New Jersey	3/4/12
1372	[redacted]	Saugus	California	3/4/12
1373	[redacted]	Edison	New Jersey	3/4/12
1374	[redacted]	El Segundo	California	3/4/12
1375	[redacted]	Galveston	Texas	3/4/12
1376	[redacted]	Edison	New Jersey	3/4/12
1377	[redacted]	Montgomery	Alabama	3/4/12
1378	[redacted]	North Brunswick	New Jersey	3/4/12
1379	[redacted]	Clermont	Florida	3/4/12
1380	[redacted]	Fulham		3/4/12
1381	[redacted]	Kokomo	Indiana	3/4/12
1382	[redacted]	marlton	New Jersey	3/4/12
1383	[redacted]	Hillsborough	New Jersey	3/4/12
1384	[redacted]	campbell hall	New York	3/4/12
1385	[redacted]	Lake Hopatcong	New Jersey	3/4/12
1386	[redacted]	Woodbridge	New Jersey	3/4/12
1387	[redacted]	Ocean Grove	New Jersey	3/4/12
1388	[redacted]	Gorham	Maine	3/4/12
1389	[redacted]	Rumson	New York	3/4/12
1390	[redacted]	stone ridge	New York	3/4/12
1391	[redacted]	Houston	Texas	3/4/12
1392	[redacted]	Yuma	Arizona	3/4/12
1393	[redacted]	Ringwood	New Jersey	3/4/12
1394	[redacted]	Edison	New Jersey	3/4/12

#	Name	City	State	Date
1395	[redacted]	Shrewsbury	Massachusetts	3/4/12
1396	[redacted]	Asheville	North Carolina	3/4/12
1397	[redacted]	Southlake	Texas	3/4/12
1398	[redacted]	Shelton		3/4/12
1399	[redacted]	beachwood	New Jersey	3/4/12
1400	[redacted]	Washington	District Of Columbia	3/4/12
1401	[redacted]	Montreal		3/4/12
1402	[redacted]	East Rutherford	New Jersey	3/5/12
1403	[redacted]	Bergenfield	New Jersey	3/5/12
1404	[redacted]	Fair Oaks	California	3/5/12
1405	[redacted]	Folsom	Louisiana	3/5/12
1406	[redacted]	Flanders	New Jersey	3/5/12
1407	[redacted]	Chicago	Illinois	3/5/12
1408	[redacted]	EDISON	New Jersey	3/5/12
1409	[redacted]	San Jose	California	3/5/12
1410	[redacted]	Post Falls	Idaho	3/5/12
1411	[redacted]	Ocala	Florida	3/5/12
1412	[redacted]	edison	New Jersey	3/5/12
1413	[redacted]	Edison	New Jersey	3/5/12
1414	[redacted]	Tampa	Florida	3/5/12
1415	[redacted]	Middle Island	New York	3/5/12
1416	[redacted]	Fords	New Jersey	3/5/12
1417	[redacted]	Hilo	Hawaii	3/5/12
1418	[redacted]	Indianapolis	Indiana	3/5/12
1419	[redacted]	Fresno	California	3/5/12
1420	[redacted]	Grants Pass	Oregon	3/5/12
1421	[redacted]	Bay Shore	New York	3/5/12
1422	[redacted]	Los Angeles	California	3/5/12
1423	[redacted]	Ward Cove	Alaska	3/5/12
1424	[redacted]	hay el hamadia		3/5/12
1425	[redacted]	Thousand Oaks	California	3/5/12
1426	[redacted]	Arcata	California	3/5/12
1427	[redacted]	Zanesville	Ohio	3/5/12
1428	[redacted]	Frankfort	Kentucky	3/5/12
1429	[redacted]	Boonton	New Jersey	3/5/12
1430	[redacted]	Las Vegas	New Mexico	3/5/12
1431	[redacted]	Ringwood	New Jersey	3/5/12
1432	[redacted]	edison	New Jersey	3/5/12
1433	[redacted]	Fords	New Jersey	3/5/12
1434	[redacted]	New Brunswick	New Jersey	3/5/12
1435	[redacted]	Aberdeen	New Jersey	3/5/12
1436	[redacted]	Westerville	Ohio	3/5/12
1437	[redacted]	Austin	Texas	3/5/12
1438	[redacted]	Chicago	Illinois	3/5/12
1439	[redacted]	Louisburg	North Carolina	3/5/12

	Name	City	State	Date
1440	[redacted]	Cranbury	New Jersey	3/5/12
1441		Perth Amboy	New Jersey	3/5/12
1442		Glen Ridge	New Jersey	3/5/12
1443		Watsonville	California	3/5/12
1444		Terre Haute	Indiana	3/5/12
1445		Julian	California	3/5/12
1446		Plymouth	Massachusetts	3/5/12
1447		Vancouver	Washington	3/5/12
1448		Stellenbosch		3/5/12
1449		Hutto	Texas	3/5/12
1450		Antioch	California	3/5/12
1451		Newark	New Jersey	3/5/12
1452		Tucson	Arizona	3/5/12
1453		Birch Run	Michigan	3/5/12
1454		montclair	New Jersey	3/5/12
1455		New York	New York	3/5/12
1456		Edison	New Jersey	3/5/12
1457		Jacksonville	Florida	3/5/12
1458		Florham Park	New Jersey	3/5/12
1459		Santa Monica	California	3/5/12
1460		Elkins Park	Pennsylvania	3/5/12
1461		Newark	New Jersey	3/5/12
1462		Truro	Alabama	3/5/12
1463		Dalton	Georgia	3/5/12
1464		Lexington	Texas	3/5/12
1465		Schenectady	New York	3/5/12
1466		Boerne	Texas	3/5/12
1467		BANGOR	Maine	3/5/12
1468		-----	Florida	3/5/12
1469		Sonoma	California	3/5/12
1470		Portland	Oregon	3/5/12
1471		Easton	Pennsylvania	3/5/12

EWA

change.org

To: The Governor of NJ, State Rep. Upendra Chivukula (NJ-017B), State Sen. Samuel Thompson (NJ-012), Rep. Rush Holt (NJ-12), Sen. Barbara Boxer (CA), USEPA Region 2 Administrator (Judith Enck), USEPA Administrator (Lisa Jackson), Commissioner (Bob Martin), USEPA Region 2 Superfund Chief (Walter Mugdan), Pfizer (Wendy Lazarus), Pfizer (Russell Downey)

Subject: Stop toxic cancer-causing chemicals from seeping into the Raritan River!

Letter: Greetings,

I respectfully request that you strongly compel the United States Environmental Protection Agency (USEPA) to take immediate action to stop the toxic, cancer-causing chemical seep draining into the Raritan River from the 80-year old American Cyanamid Superfund Site in Bridgewater.

The 575-acre site sits directly adjacent to the longest river solely in New Jersey, as well as the Delaware and Raritan Canal, which is used for drinking water for hundreds of thousands of families in the surrounding area. The USEPA recently discovered benzene, a toxic carcinogen known to potentially cause damage to the immune system, oral cancer, and leukemia on the American Cyanamid Superfund Site at 20,000 times the acceptable federal standard.

The site's leaking chemical lagoons, known as lagoons 1 and 2, must be cleaned up immediately. Please tell the USEPA that erecting a temporary Band-Aid of carbon bags and hay bales along the bank to "catch" the seeps is not acceptable. Additionally, I ask that you request the USEPA to require the site's Responsible Party, Pfizer, a billion dollar pharmaceutical company, to fully remediate the on-site historic lagoons from this leaking toxic waste site that is causing this potential health hazard.

This site cleanup has been languishing for over two decades, and it is time for USEPA to take serious action. In order to protect the health and safety of families that utilize this area for recreation, the source of this contamination must be addressed immediately. For the bikers, hikers, fisherman and kayakers, for the osprey, bald eagles, turtles and trout, please urge USEPA to make this site cleanup a top priority and to take immediate action to remove the toxic chemicals draining into our regional resource, the Raritan River. Thank you for your timely assistance on this important environmental issue.

Respectfully,

SIGNATURES

	Name	City	State	Date
1	[redacted]	Edison	New Jersey	6/24/2011
2	[redacted]	Linden	New Jersey	6/24/2011
3	[redacted]	West Orange	New Jersey	6/24/2011
4	[redacted]	Monmouth Junction	New Jersey	6/24/2011
5	[redacted]	Edison	New Jersey	6/24/2011
6	[redacted]	Forest Hills	New York	6/24/2011
7	[redacted]	West Orange	New Jersey	6/24/2011
8	[redacted]	Bridgeton	New Jersey	6/24/2011
9	[redacted]	Fair Lawn	New Jersey	6/24/2011
10	[redacted]	Kendall park	New Jersey	6/24/2011
11	[redacted]	PERTH AMBOY	New Jersey	6/24/2011
12	[redacted]	Roselle	New Jersey	6/24/2011
13	[redacted]	W Allenhurst	New Jersey	6/24/2011
14	[redacted]	Glen Ridge	New Jersey	6/24/2011
15	[redacted]	Montville	New Jersey	6/24/2011
16	[redacted]	Arlington	Texas	6/24/2011
17	[redacted]	Cherry Hill	New Jersey	6/24/2011
18	[redacted]	Maplewood	New Jersey	6/24/2011
19	[redacted]	Lawrenceville	New Jersey	6/24/2011
20	[redacted]	Kettering		6/24/2011
21	[redacted]	Scranton	Pennsylvania	6/24/2011
22	[redacted]	St. PÃ¶lten		6/24/2011
23	[redacted]	Gabrovo		6/24/2011
24	[redacted]	Salem	Oregon	6/24/2011
25	[redacted]	Liverpool		6/24/2011
26	[redacted]	Fair Oaks	California	6/24/2011
27	[redacted]	Chicago	Illinois	6/24/2011
28	[redacted]	Pasadena	Maryland	6/24/2011
29	[redacted]	Spotsylvania	Virginia	6/24/2011
30	[redacted]	Brewster	New York	6/24/2011
31	[redacted]	Anadia		6/24/2011
32	[redacted]	Weymouth		6/24/2011
33	[redacted]	Suva	Hawaii	6/24/2011
34	[redacted]	Jackson Heights	New York	6/24/2011
35	[redacted]	springfield	Ohio	6/24/2011
36	[redacted]	Sacaton	Arizona	6/24/2011
37	[redacted]	Manchester	New Hampshire	6/24/2011
38	[redacted]	stavanger	Nevada	6/24/2011
39	[redacted]	Pompton Lakes	New Jersey	6/24/2011
40	[redacted]	Randolpj	New Jersey	6/24/2011
41	[redacted]	Oakhurst	New Jersey	6/24/2011
42	[redacted]	London		6/24/2011
43	[redacted]	Sauk City	Wisconsin	6/24/2011
44	[redacted]	London		6/24/2011

	Name	City	State	Date
45	[redacted]	Chicago	Illinois	6/24/2011
46		timisoara		6/24/2011
47		Haddonfield	New Jersey	6/24/2011
48		Pipersville	Pennsylvania	6/24/2011
49		Concord	California	6/24/2011
50		Saratoga	California	6/24/2011
51		Berlin		6/24/2011
52		rancho cordova	California	6/24/2011
53		Spring Hope	North Carolina	6/24/2011
54		Bethlehem	Pennsylvania	6/24/2011
55		johnson city	Tennessee	6/24/2011
56		West Orange	New Jersey	6/24/2011
57		boca raton	Florida	6/24/2011
58		brooklyn	New York	6/24/2011
59		Shortsville	New York	6/24/2011
60		Hertford		6/24/2011
61		Davis	California	6/24/2011
62		West Haven	Connecticut	6/24/2011
63		Fargo	North Dakota	6/24/2011
64		Manitou Springs	Colorado	6/24/2011
65		New York	New York	6/24/2011
66		Hagerstown	Maryland	6/24/2011
67		Framingham	Massachusetts	6/24/2011
68		Webb City	Missouri	6/24/2011
69		Chicago	Illinois	6/24/2011
70		buenos aires		6/24/2011
71		Joppa	Maryland	6/24/2011
72		Rijeka		6/24/2011
73		Northfield		6/24/2011
74		Adelaide		6/24/2011
75		Honolulu	Hawaii	6/24/2011
76		Chicago	Illinois	6/24/2011
77		oklahoma city	Oklahoma	6/24/2011
78		Pearl City	Hawaii	6/24/2011
79		chihuahua	Maine	6/24/2011
80		london		6/24/2011
81		Finleyville	Pennsylvania	6/25/2011
82		Amersfoort		6/25/2011
83		Ottawa		6/25/2011
84		Basel		6/25/2011
85		Peconic	New York	6/25/2011
86		Olympia	Washington	6/25/2011
87		Hasselt		6/25/2011
88		Zagreb		6/25/2011
89		savona		6/25/2011

	Name	City	State	Date
90	[redacted]	Langley Park, Durham		6/25/2011
91	[redacted]	Como		6/25/2011
92	[redacted]	Indianapolis	Indiana	6/25/2011
93	[redacted]	Chicago	Illinois	6/25/2011
94	[redacted]	North Olmsted	Ohio	6/25/2011
95	[redacted]	St. Louis Park	Minnesota	6/25/2011
96	[redacted]	Slate Hill	New York	6/25/2011
97	[redacted]	Verona		6/25/2011
98	[redacted]	Perkasie	Pennsylvania	6/25/2011
99	[redacted]	Mansfield Center	Connecticut	6/25/2011
100	[redacted]	Mansfield Center	Connecticut	6/25/2011
101	[redacted]	Chicago	Illinois	6/25/2011
102	[redacted]	San Francisco	California	6/25/2011
103	[redacted]	Sussex	Wisconsin	6/25/2011
104	[redacted]	Bushkill	Pennsylvania	6/25/2011
105	[redacted]	Mount Vernon	Kentucky	6/25/2011
106	[redacted]	Stratford		6/25/2011
107	[redacted]	barcelona		6/25/2011
108	[redacted]	Pierrelatte		6/25/2011
109	[redacted]	Revigny-sur-Ornain		6/25/2011
110	[redacted]	Helena	Arkansas	6/25/2011
111	[redacted]	Oakand	California	6/25/2011
112	[redacted]	Kansas City	Missouri	6/25/2011
113	[redacted]	tampa	Florida	6/25/2011
114	[redacted]	NYC	New York	6/25/2011
115	[redacted]	KrakÃ³w		6/25/2011
116	[redacted]	Los Angeles	California	6/25/2011
117	[redacted]	Omaha	Nebraska	6/25/2011
118	[redacted]	Toms River	New Jersey	6/25/2011
119	[redacted]	laval		6/25/2011
120	[redacted]	Garden City	Michigan	6/25/2011
121	[redacted]	Detroit	Michigan	6/25/2011
122	[redacted]	west orange	New Jersey	6/25/2011
123	[redacted]	SAINT LEU LA FORET		6/25/2011
124	[redacted]	Des Moines	Iowa	6/25/2011
125	[redacted]	Casa Grande	Arizona	6/25/2011
126	[redacted]	los Angeles	California	6/25/2011
127	[redacted]	SAINT LEU LA FORET		6/25/2011
128	[redacted]	West New York	New Jersey	6/25/2011
129	[redacted]	Tacoma	Washington	6/25/2011
130	[redacted]	Langley		6/25/2011
131	[redacted]	Newtown	Connecticut	6/25/2011
132	[redacted]	glendale	Arizona	6/25/2011
133	[redacted]	jackson	New Jersey	6/25/2011
134	[redacted]	sana'a		6/25/2011

	Name	City	State	Date
135	[redacted]	Portland	Oregon	6/25/2011
136	[redacted]	Jackson	New Jersey	6/25/2011
137	[redacted]	N. Ireland		6/26/2011
138	[redacted]	Krefeld		6/26/2011
139	[redacted]	Chicago	Illinois	6/26/2011
140	[redacted]	Hesperia	California	6/26/2011
141	[redacted]	Palermo		6/26/2011
142	[redacted]	Boe i Telemark		6/26/2011
143	[redacted]	El Segundo	California	6/26/2011
144	[redacted]	Guelph		6/26/2011
145	[redacted]	Prairie Village	Kansas	6/26/2011
146	[redacted]	Findlay	Ohio	6/26/2011
147	[redacted]	Highland Village	Texas	6/26/2011
148	[redacted]	Valley Stream	New York	6/26/2011
149	[redacted]	Aliquippa	Pennsylvania	6/26/2011
150	[redacted]	Nanuet	New York	6/26/2011
151	[redacted]	Flushing	New York	6/26/2011
152	[redacted]	rockville	Maryland	6/26/2011
153	[redacted]	Whiting	New Jersey	6/26/2011
154	[redacted]	Cambridge	Massachusetts	6/26/2011
155	[redacted]	Springfield	Missouri	6/26/2011
156	[redacted]	Murfreesboro	Tennessee	6/26/2011
157	[redacted]	Greenbelt	Maryland	6/26/2011
158	[redacted]	Lady Lake	Florida	6/26/2011
159	[redacted]	New Haven	Connecticut	6/26/2011
160	[redacted]	Torre del Mar		6/26/2011
161	[redacted]	South Park	Pennsylvania	6/26/2011
162	[redacted]	Philadelphia	Pennsylvania	6/26/2011
163	[redacted]	Elmira	New York	6/26/2011
164	[redacted]	Irving	Texas	6/26/2011
165	[redacted]	Sherwood	Ohio	6/26/2011
166	[redacted]	Vacaville	California	6/26/2011
167	[redacted]	JundiaÃ-/SP		6/26/2011
168	[redacted]	Fair Play	South Carolina	6/26/2011
169	[redacted]	Tifton	Georgia	6/26/2011
170	[redacted]	Blacksburg	Virginia	6/26/2011
171	[redacted]	Jamaica Plain	Massachusetts	6/26/2011
172	[redacted]	ALTON	Illinois	6/26/2011
173	[redacted]	Knox	Indiana	6/26/2011
174	[redacted]	Gainesville	Florida	6/26/2011
175	[redacted]	San Diego	California	6/26/2011
176	[redacted]	palermo		6/26/2011
177	[redacted]	Staten Island	New York	6/26/2011
178	[redacted]	Westerkappeln		6/26/2011
179	[redacted]	Niagara Falls	California	6/26/2011

	Name	City	State	Date
180	[redacted]	Argentona		6/26/2011
181	[redacted]	San Anselmo	California	6/26/2011
182	[redacted]	Oshkosh	Wisconsin	6/26/2011
183	[redacted]	Stillwater	Minnesota	6/26/2011
184	[redacted]	Winnipeg		6/26/2011
185	[redacted]	Jersey City	New Jersey	6/26/2011
186	[redacted]	Hood River	Oregon	6/26/2011
187	[redacted]	Bethesda	Ohio	6/26/2011
188	[redacted]	San Francisco	California	6/26/2011
189	[redacted]	Long Beach	California	6/26/2011
190	[redacted]	Perth Amboy	New Jersey	6/26/2011
191	[redacted]	Mokena	Illinois	6/26/2011
192	[redacted]	Leiderdorp	District Of Columbia	6/26/2011
193	[redacted]	Melvindale	Michigan	6/26/2011
194	[redacted]	Forest Hills	New York	6/26/2011
195	[redacted]	Pearl City	Hawaii	6/26/2011
196	[redacted]	FORT WORTH	Texas	6/26/2011
197	[redacted]	kingston	Tennessee	6/26/2011
198	[redacted]	cincinnati	Ohio	6/26/2011
199	[redacted]	Lackawaxen	Pennsylvania	6/26/2011
200	[redacted]	Jamaica	New York	6/26/2011
201	[redacted]	Murrieta	California	6/26/2011
202	[redacted]	Bloomington	Minnesota	6/26/2011
203	[redacted]	Danville	Pennsylvania	6/26/2011
204	[redacted]	West Orange	New Jersey	6/26/2011
205	[redacted]	San Diego	California	6/26/2011
206	[redacted]	red bank	New Jersey	6/26/2011
207	[redacted]	santa monica	California	6/26/2011
208	[redacted]	Ventura	California	6/26/2011
209	[redacted]	Bellingham	Washington	6/26/2011
210	[redacted]	Auburn Hills	Michigan	6/26/2011
211	[redacted]	St Augustine	Florida	6/26/2011
212	[redacted]	New York	New York	6/26/2011
213	[redacted]	Santa Fe	New Mexico	6/26/2011
214	[redacted]	Plainfield	New Jersey	6/26/2011
215	[redacted]	Santa Cruz	California	6/26/2011
216	[redacted]	Cockeysville	Maryland	6/26/2011
217	[redacted]	De Land	Florida	6/26/2011
218	[redacted]	Sidney		6/26/2011
219	[redacted]	daytona beach	Florida	6/26/2011
220	[redacted]	Clanton	Alabama	6/26/2011
221	[redacted]	la selva beach	California	6/26/2011
222	[redacted]	Willemstad		6/26/2011
223	[redacted]	Kathmandu		6/26/2011
224	[redacted]	Brisbane		6/26/2011

	Name	City	State	Date
225	[redacted]	Brooklyn	New York	6/26/2011
226	[redacted]	Lake City	Florida	6/26/2011
227	[redacted]	Phoenix	Arizona	6/26/2011
228	[redacted]	Long Branch	New Jersey	6/26/2011
229	[redacted]	Brooklyn	New York	6/26/2011
230	[redacted]	Chattanooga	Tennessee	6/26/2011
231	[redacted]	Albuquerque	New Mexico	6/26/2011
232	[redacted]	Madrid/Spain	Alabama	6/26/2011
233	[redacted]	Ojai,	California	6/26/2011
234	[redacted]	Kenmore	Washington	6/26/2011
235	[redacted]	Boulder	Colorado	6/26/2011
236	[redacted]	brooklyn	New York	6/26/2011
237	[redacted]	Kansas City	Kansas	6/26/2011
238	[redacted]	Front Royal	Virginia	6/26/2011
239	[redacted]	Centre hall	Puerto Rico	6/26/2011
240	[redacted]	Garden Grove	California	6/26/2011
241	[redacted]	Henley	Maryland	6/26/2011
242	[redacted]	Allison Park	Pennsylvania	6/26/2011
243	[redacted]	Poland	Indiana	6/26/2011
244	[redacted]	Rochester	New York	6/26/2011
245	[redacted]	Sulphur Springs	Texas	6/26/2011
246	[redacted]	sf	California	6/26/2011
247	[redacted]	Washington	District Of Columbia	6/26/2011
248	[redacted]	Philadelphia	Pennsylvania	6/26/2011
249	[redacted]	Little Rock	Arkansas	6/26/2011
250	[redacted]	bullvalley	Illinois	6/26/2011
251	[redacted]	Saratoga	California	6/26/2011
252	[redacted]	Honolulu	Hawaii	6/26/2011
253	[redacted]	west park	Florida	6/26/2011
254	[redacted]	Des Moines	Washington	6/26/2011
255	[redacted]	Ellicott City	Maryland	6/26/2011
256	[redacted]	Sioux Falls	South Dakota	6/26/2011
257	[redacted]	MIDDLETOWN	New York	6/26/2011
258	[redacted]	Novokuznetsk	Federated States of M	6/26/2011
259	[redacted]	Pomona	California	6/26/2011
260	[redacted]	istanbul turkey	District Of Columbia	6/26/2011
261	[redacted]	San Diego	California	6/26/2011
262	[redacted]	perth,scotland		6/26/2011
263	[redacted]	milton	Georgia	6/26/2011
264	[redacted]	Sonoma	California	6/26/2011
265	[redacted]	San Pedro	California	6/26/2011
266	[redacted]	Port Orford	Oregon	6/26/2011
267	[redacted]	New York	New York	6/26/2011
268	[redacted]	Mashpee	Massachusetts	6/26/2011
269	[redacted]	San Anselmo	California	6/26/2011

	Name	City	State	Date
270	[redacted]	Adelaide		6/26/2011
271	[redacted]	glen waverley		6/26/2011
272	[redacted]	Rockport	Washington	6/26/2011
273	[redacted]	Samara	Ohio	6/26/2011
274	[redacted]	los angles	California	6/26/2011
275	[redacted]	Pittsburg	California	6/26/2011
276	[redacted]	Los Angeles	California	6/26/2011
277	[redacted]	Downers Grove	Illinois	6/26/2011
278	[redacted]	Monterrey	Texas	6/26/2011
279	[redacted]	Lucknow		6/26/2011
280	[redacted]	Ragusa		6/26/2011
281	[redacted]	Murrumbateman		6/26/2011
282	[redacted]	Kihei	Hawaii	6/27/2011
283	[redacted]	Hewitt	New Jersey	6/27/2011
284	[redacted]	Granger	Indiana	6/27/2011
285	[redacted]	New York	New York	6/27/2011
286	[redacted]	San Francisco	California	6/27/2011
287	[redacted]	Pleasant Hill	California	6/27/2011
288	[redacted]	Zagreb	California	6/27/2011
289	[redacted]	Kirke Saaby		6/27/2011
290	[redacted]	Bandung		6/27/2011
291	[redacted]	N. Saanich		6/27/2011
292	[redacted]	Racine	Wisconsin	6/27/2011
293	[redacted]	ROME		6/27/2011
294	[redacted]	rotterdam		6/27/2011
295	[redacted]	London,		6/27/2011
296	[redacted]	Costa Mesa	California	6/27/2011
297	[redacted]	Parvenets		6/27/2011
298	[redacted]	Florina		6/27/2011
299	[redacted]	Piraeus	Alabama	6/27/2011
300	[redacted]	Prague 4		6/27/2011
301	[redacted]	baia mare		6/27/2011
302	[redacted]	Beverley Hills		6/27/2011
303	[redacted]	piraeus		6/27/2011
304	[redacted]	osijek		6/27/2011
305	[redacted]	Leicestershire		6/27/2011
306	[redacted]	Durban		6/27/2011
307	[redacted]	Bristol		6/27/2011
308	[redacted]	MIKOLOW		6/27/2011
309	[redacted]	Sidmouth		6/27/2011
310	[redacted]	Brisbane		6/27/2011
311	[redacted]	stockholm		6/27/2011
312	[redacted]	brooklyn	New York	6/27/2011
313	[redacted]	Hamilton	New Jersey	6/27/2011
314	[redacted]	albano laz.	Wyoming	6/27/2011

	Name	City	State	Date
315	[redacted]	Loxahatchee	Florida	6/27/2011
316		NY	New York	6/27/2011
317		Freiburg		6/27/2011
318		Boston	Massachusetts	6/27/2011
319		Aurora	Illinois	6/27/2011
320		Vaasa		6/27/2011
321		Benamaurel		6/27/2011
322		Eastton	Kansas	6/27/2011
323		bloomington	Indiana	6/27/2011
324		Gold Coast, Qld.		6/27/2011
325		Karachi		6/27/2011
326		Melbourne	Florida	6/27/2011
327		Pennsburg	Pennsylvania	6/27/2011
328		lodz		6/27/2011
329		Chicago	Illinois	6/27/2011
330		Ringoes	New Jersey	6/27/2011
331		Wheaton	Illinois	6/27/2011
332		London	California	6/27/2011
333		Aberdeen		6/27/2011
334		Jerusalem		6/27/2011
335		racine	Wisconsin	6/27/2011
336		Fort Wayne	Indiana	6/27/2011
337		Bremerton	Washington	6/27/2011
338		Paradise	Michigan	6/27/2011
339		New Haven	Connecticut	6/27/2011
340		Lancaster		6/27/2011
341		Bethel Park	Pennsylvania	6/27/2011
342		milan		6/27/2011
343		Villa Gobernador Galvez		6/27/2011
344		swansea	Utah	6/27/2011
345		Brooklyn	New York	6/27/2011
346		park Falls	Wisconsin	6/27/2011
347		Dawson	Iowa	6/27/2011
348		Toronto		6/27/2011
349		Poca	West Virginia	6/27/2011
350		Krsko	Alabama	6/27/2011
351		Gastonia	North Carolina	6/27/2011
352		Lexington	Kentucky	6/27/2011
353		Xalapa		6/27/2011
354		San Diego	California	6/27/2011
355		Myrtle Creek	Oregon	6/27/2011
356		Dayton	Ohio	6/27/2011
357		San Francisco	California	6/27/2011
358		Sacrofano		6/27/2011
359		Greeneville	Tennessee	6/27/2011

	Name	City	State	Date
360	[redacted]	Cambridge	Massachusetts	6/27/2011
361	[redacted]	Knutsford		6/27/2011
362	[redacted]	Buffalo	New York	6/27/2011
363	[redacted]	Mosheim	Tennessee	6/27/2011
364	[redacted]	clifton	New Jersey	6/27/2011
365	[redacted]	Montrose	Colorado	6/27/2011
366	[redacted]	Eching		6/27/2011
367	[redacted]	Monroe	New Jersey	6/27/2011
368	[redacted]	Munhall	Pennsylvania	6/27/2011
369	[redacted]	MOUNT LAUREL	New Jersey	6/27/2011
370	[redacted]	Chicago	Illinois	6/27/2011
371	[redacted]	Toms River	New Jersey	6/27/2011
372	[redacted]	Tampa	Florida	6/27/2011
373	[redacted]	Beaverton	Oregon	6/27/2011
374	[redacted]	Phoenix	Arizona	6/27/2011
375	[redacted]	METUCHEN	New Jersey	6/27/2011
376	[redacted]	Brooklyn	Connecticut	6/27/2011
377	[redacted]	Reseda	California	6/27/2011
378	[redacted]	Edison	New Jersey	6/27/2011
379	[redacted]	Madison	Wisconsin	6/27/2011
380	[redacted]	Knoxville	Tennessee	6/27/2011
381	[redacted]	Warszawa		6/27/2011
382	[redacted]	Hillsborough	New Jersey	6/27/2011
383	[redacted]	Berlin	Massachusetts	6/27/2011
384	[redacted]	Novato	California	6/27/2011
385	[redacted]	Dublin	Alabama	6/27/2011
386	[redacted]	Upper Lake	California	6/27/2011
387	[redacted]	Roma		6/27/2011
388	[redacted]	Hempstead	New York	6/27/2011
389	[redacted]	Vista	California	6/27/2011
390	[redacted]	Longmont	Colorado	6/27/2011
391	[redacted]	Seven Valleys	Pennsylvania	6/27/2011
392	[redacted]	Rancho Palos Verdes	California	6/27/2011
393	[redacted]	Nashville	Tennessee	6/27/2011
394	[redacted]	Rhodes Island		6/27/2011
395	[redacted]	Chatham	New Jersey	6/27/2011
396	[redacted]	Ft Pierce	Florida	6/27/2011
397	[redacted]	Keyport	New Jersey	6/27/2011
398	[redacted]	Dana	North Carolina	6/27/2011
399	[redacted]	Keyport	New Jersey	6/27/2011
400	[redacted]	Rogers	Arkansas	6/27/2011
401	[redacted]	Edison	New Jersey	6/27/2011
402	[redacted]	danbury	Connecticut	6/27/2011
403	[redacted]	New York	New York	6/27/2011
404	[redacted]	shropshire		6/27/2011

	Name	City	State	Date
405	[redacted]	Pompton Lakes	New Jersey	6/27/2011
406	[redacted]	Poplarville	Mississippi	6/27/2011
407	[redacted]	Hollywood	Florida	6/27/2011
408	[redacted]	Greenville	South Carolina	6/27/2011
409	[redacted]	Bennington	Vermont	6/27/2011
410	[redacted]	Eugene	Oregon	6/27/2011
411	[redacted]	Portland	Oregon	6/27/2011
412	[redacted]	Northbrook	Illinois	6/27/2011
413	[redacted]	Smyrna	Georgia	6/27/2011
414	[redacted]	Veracruz		6/27/2011
415	[redacted]	Fords	New Jersey	6/27/2011
416	[redacted]	Patra		6/27/2011
417	[redacted]	Ft. Myers	Florida	6/27/2011
418	[redacted]	Barss Corner		6/27/2011
419	[redacted]	Austell	Georgia	6/27/2011
420	[redacted]	Verona	New Jersey	6/27/2011
421	[redacted]	Morrisville	Pennsylvania	6/27/2011
422	[redacted]	Studio City	California	6/27/2011
423	[redacted]	Hohenwart	Virgin Islands	6/27/2011
424	[redacted]	Dana Point	California	6/27/2011
425	[redacted]	San Francisco	California	6/27/2011
426	[redacted]	poulsbo	Washington	6/27/2011
427	[redacted]	Wilsall	Montana	6/27/2011
428	[redacted]	Durban		6/27/2011
429	[redacted]	Karlsruhe		6/27/2011
430	[redacted]	phoenix	Arizona	6/27/2011
431	[redacted]	Millsap	Texas	6/27/2011
432	[redacted]	Minneapolis	Minnesota	6/27/2011
433	[redacted]	Tokyo		6/27/2011
434	[redacted]	dreux		6/27/2011
435	[redacted]	Tucson	Arizona	6/27/2011
436	[redacted]	Bishop	Texas	6/27/2011
437	[redacted]	Iowa City	Iowa	6/27/2011
438	[redacted]	Warsaw		6/27/2011
439	[redacted]	NYC	New York	6/27/2011
440	[redacted]	Leighton Buzzard		6/27/2011
441	[redacted]	New York	New York	6/27/2011
442	[redacted]	roma		6/27/2011
443	[redacted]	Eau Claire	Wisconsin	6/27/2011
444	[redacted]	Whitewater	Wisconsin	6/27/2011
445	[redacted]	boonton township	New Jersey	6/27/2011
446	[redacted]	Decatur	Georgia	6/27/2011
447	[redacted]	Plovdiv		6/27/2011
448	[redacted]	Ironton	Missouri	6/27/2011
449	[redacted]	union	New Jersey	6/27/2011

	Name	City	State	Date
450	[redacted]	Anchorage	Alaska	6/27/2011
451	[redacted]	rock falls	Illinois	6/27/2011
452	[redacted]	Fontana	California	6/27/2011
453	[redacted]	Chicago	Illinois	6/27/2011
454	[redacted]	Norderney		6/27/2011
455	[redacted]	naples	Florida	6/27/2011
456	[redacted]	salt lake city	Utah	6/27/2011
457	[redacted]	Trieste	Iowa	6/27/2011
458	[redacted]	vlagtwedde		6/27/2011
459	[redacted]	Santiago		6/27/2011
460	[redacted]	Bloomingdale	New Jersey	6/27/2011
461	[redacted]	Las Cruces,	New Mexico	6/27/2011
462	[redacted]	Encino	California	6/27/2011
463	[redacted]	Chandler	Arizona	6/27/2011
464	[redacted]	Coral Gables	Florida	6/27/2011
465	[redacted]	Honolulu	Hawaii	6/27/2011
466	[redacted]	Paramount	California	6/27/2011
467	[redacted]	Boulder	Colorado	6/27/2011
468	[redacted]	columbia	Tennessee	6/27/2011
469	[redacted]	Belvidere	Illinois	6/27/2011
470	[redacted]	Bayside Hills	New York	6/27/2011
471	[redacted]	New Brunswick	New Jersey	6/27/2011
472	[redacted]	Ellicott City	Maryland	6/27/2011
473	[redacted]	New London	North Carolina	6/27/2011
474	[redacted]	chicago	Illinois	6/27/2011
475	[redacted]	Woodbridge	New Jersey	6/27/2011
476	[redacted]	wantagh	New York	6/27/2011
477	[redacted]	Arnold	Missouri	6/27/2011
478	[redacted]	SetÃºbal		6/27/2011
479	[redacted]	san jose	California	6/27/2011
480	[redacted]	Butler	New Jersey	6/27/2011
481	[redacted]	Charlottesville	Virginia	6/27/2011
482	[redacted]	denver	Colorado	6/27/2011
483	[redacted]	Lemoore	California	6/27/2011
484	[redacted]	Pottsville	Pennsylvania	6/27/2011
485	[redacted]	shelbyville	Tennessee	6/27/2011
486	[redacted]	Torres Novas		6/27/2011
487	[redacted]	Chicago	Illinois	6/27/2011
488	[redacted]	Oshkosh	Wisconsin	6/27/2011
489	[redacted]	San Francisco	California	6/27/2011
490	[redacted]	St Louis	Missouri	6/27/2011
491	[redacted]	Hastings		6/27/2011
492	[redacted]	Boca Raton	Florida	6/27/2011
493	[redacted]	Los Angeles	California	6/27/2011
494	[redacted]	Washington	Pennsylvania	6/27/2011

	Name	City	State	Date
495	[redacted]	Dayboro		6/27/2011
496	[redacted]	winchester	Massachusetts	6/27/2011
497	[redacted]	perth	Washington	6/27/2011
498	[redacted]	Merthyr Tydfil, Mid Glamorgan		6/27/2011
499	[redacted]	janesville	Wisconsin	6/27/2011
500	[redacted]	Miami	Florida	6/27/2011
501	[redacted]	thunder bay		6/27/2011
502	[redacted]	Paramus	New Jersey	6/27/2011
503	[redacted]	Hallandale beach	Florida	6/27/2011
504	[redacted]	Skillman	New Jersey	6/27/2011
505	[redacted]	portland	Oregon	6/27/2011
506	[redacted]	San Pedro	California	6/27/2011
507	[redacted]	Lantier		6/27/2011
508	[redacted]	Mexico City		6/27/2011
509	[redacted]	escondido	California	6/27/2011
510	[redacted]	Bethesda	Maryland	6/27/2011
511	[redacted]	Winter Park	Florida	6/27/2011
512	[redacted]	Brooklyn	New York	6/27/2011
513	[redacted]	Tujunga	California	6/27/2011
514	[redacted]	Minneapolis	Minnesota	6/27/2011
515	[redacted]	Brookline	Massachusetts	6/27/2011
516	[redacted]	Morrice	Michigan	6/27/2011
517	[redacted]	Union	Kentucky	6/27/2011
518	[redacted]	Ontario	California	6/27/2011
519	[redacted]	Winnipeg, MB.		6/27/2011
520	[redacted]	Los Angeles	California	6/27/2011
521	[redacted]	TORINO		6/27/2011
522	[redacted]	Jersey City	New Jersey	6/28/2011
523	[redacted]	Winzer	Delaware	6/28/2011
524	[redacted]	Fort Collins	Colorado	6/28/2011
525	[redacted]	Arkhangelsk		6/28/2011
526	[redacted]	Randwick		6/28/2011
527	[redacted]	New Zealand	Federated States of M	6/28/2011
528	[redacted]	castel san pietro terme		6/28/2011
529	[redacted]	Bryn Mawr	Pennsylvania	6/28/2011
530	[redacted]	Lakeside	California	6/28/2011
531	[redacted]	Neuwied	Armed Forces America	6/28/2011
532	[redacted]	Ridderkerk		6/28/2011
533	[redacted]	Quincy	Illinois	6/28/2011
534	[redacted]	Amsterdam		6/28/2011
535	[redacted]	Vancouver		6/28/2011
536	[redacted]	Purcellville	Virginia	6/28/2011
537	[redacted]	rhodos		6/28/2011
538	[redacted]	East Hampton	New York	6/28/2011
539	[redacted]	Kuching		6/28/2011

	Name	City	State	Date
540	[redacted]	New Providence	New Jersey	6/28/2011
541	[redacted]	Celje		6/28/2011
542	[redacted]	Parma	Ohio	6/28/2011
543	[redacted]	Cocoa Beach	Florida	6/28/2011
544	[redacted]	Diamondhead	Mississippi	6/28/2011
545	[redacted]	Diamondhead	Mississippi	6/28/2011
546	[redacted]	GenÃ¨ve	New York	6/28/2011
547	[redacted]	Jersey City	New Jersey	6/28/2011
548	[redacted]	New Oxford	Pennsylvania	6/28/2011
549	[redacted]	Syktyvkar		6/28/2011
550	[redacted]	red deer		6/28/2011
551	[redacted]	destin	Florida	6/28/2011
552	[redacted]	Manchester		6/28/2011
553	[redacted]	New Brunswick	New Jersey	6/28/2011
554	[redacted]	Mercer Island	Washington	6/28/2011
555	[redacted]	San Jose	California	6/28/2011
556	[redacted]	Gresham	Oregon	6/28/2011
557	[redacted]	Sherman Oaks	California	6/28/2011
558	[redacted]	Santiago	Alaska	6/28/2011
559	[redacted]	MEXICO		6/28/2011
560	[redacted]	New york	New York	6/28/2011
561	[redacted]	Reno	Nevada	6/28/2011
562	[redacted]	Hazel Green	Alabama	6/28/2011
563	[redacted]	Foster City	California	6/28/2011
564	[redacted]	Poznan		6/28/2011
565	[redacted]	Loughborough		6/28/2011
566	[redacted]	Taunton		6/28/2011
567	[redacted]	mendoza		6/28/2011
568	[redacted]	Lismore		6/28/2011
569	[redacted]	Corning	New York	6/28/2011
570	[redacted]	Wilmington	Delaware	6/28/2011
571	[redacted]	Stony Brook	New York	6/28/2011
572	[redacted]	Roswell	Georgia	6/28/2011
573	[redacted]	Silver Spring	Maryland	6/28/2011
574	[redacted]	Mad Hts.	Michigan	6/28/2011
575	[redacted]	Aalborg	Delaware	6/29/2011
576	[redacted]	Grebenhain		6/29/2011
577	[redacted]	Montgomery	Illinois	6/29/2011
578	[redacted]	South Amboy	New Jersey	6/29/2011
579	[redacted]	Maplewood	Minnesota	6/29/2011
580	[redacted]	chicago	Illinois	6/29/2011
581	[redacted]	DALLAS	Texas	6/29/2011
582	[redacted]	El Santiscal, Arcos de la Frontera		6/29/2011
583	[redacted]	mtlaurel	New Jersey	6/29/2011
584	[redacted]	Centreville	Maryland	6/29/2011

	Name	City	State	Date
585	[redacted]	la mesa	California	6/29/2011
586	[redacted]	Faro		6/29/2011
587	[redacted]	Lords Valley	Pennsylvania	6/29/2011
588	[redacted]	Gorham	Maine	6/29/2011
589	[redacted]	Seattle	Washington	6/29/2011
590	[redacted]	Hillsborough	North Carolina	6/29/2011
591	[redacted]	Birmingham	Michigan	6/29/2011
592	[redacted]	Marion	Illinois	6/29/2011
593	[redacted]	Portland	Oregon	6/29/2011
594	[redacted]	Los Angeles	California	6/29/2011
595	[redacted]	El PSO	Texas	6/29/2011
596	[redacted]	San Diego	California	6/29/2011
597	[redacted]	Brighton	Massachusetts	6/30/2011
598	[redacted]	Miami	Florida	6/30/2011
599	[redacted]	Deerfield Beach	Florida	6/30/2011
600	[redacted]	Brighouse	Alabama	6/30/2011
601	[redacted]	Thess		6/30/2011
602	[redacted]	Deerfield Beach	Florida	6/30/2011
603	[redacted]	Laurence Harbor	New Jersey	6/30/2011
604	[redacted]	tel aviv		6/30/2011
605	[redacted]	Dresden		6/30/2011
606	[redacted]	Old Bridge	New Jersey	6/30/2011
607	[redacted]	torre annunziata(na)	Iowa	6/30/2011
608	[redacted]	Pinellas Park	Florida	6/30/2011
609	[redacted]	Denver	Colorado	6/30/2011
610	[redacted]	juarez		6/30/2011
611	[redacted]	San Rafael	California	6/30/2011
612	[redacted]	San Rafael	California	6/30/2011
613	[redacted]	prescott valley	Arizona	6/30/2011
614	[redacted]	Rancho Cucamonga	California	6/30/2011
615	[redacted]	Denison	Texas	6/30/2011
616	[redacted]	Erie	Pennsylvania	6/30/2011
617	[redacted]	Distrito Federal		6/30/2011
618	[redacted]	Porto		7/1/2011
619	[redacted]	Dhaka		7/1/2011
620	[redacted]	new york	New York	7/1/2011
621	[redacted]	Dana Point	California	7/1/2011
622	[redacted]	Jackson	New Jersey	7/1/2011
623	[redacted]	BogotÃ¡		7/1/2011
624	[redacted]	Frankston Heights		7/2/2011
625	[redacted]	Lahaska	Pennsylvania	7/2/2011
626	[redacted]	Philadelphia	Pennsylvania	7/2/2011
627	[redacted]	KL		7/3/2011
628	[redacted]	Miami	Florida	7/3/2011

	Name	City	State	Date
629	[redacted]	Tucson	Arizona	7/3/2011
630	[redacted]	Clackamas	Oregon	7/3/2011
631	[redacted]	Mexico		7/3/2011
632	[redacted]	Whitehorse		7/3/2011
633	[redacted]	Seixal		7/4/2011
634	[redacted]	Somerset	New Jersey	7/4/2011
635	[redacted]	Sandpoint	Idaho	7/4/2011
636	[redacted]	Neptune	New Jersey	7/4/2011
637	[redacted]	Bogota		7/4/2011
638	[redacted]	marano sul panaro		7/5/2011
639	[redacted]	Adelaide		7/5/2011
640	[redacted]	Jeannette	Pennsylvania	7/5/2011
641	[redacted]	Alicante		7/5/2011
642	[redacted]	Point Pleasant	New Jersey	7/5/2011
643	[redacted]	Wellington	Florida	7/5/2011
644	[redacted]	Greenbelt	Maryland	7/5/2011
645	[redacted]	San Jose	California	7/6/2011
646	[redacted]	telluride	Colorado	7/6/2011
647	[redacted]	Iowa City	Iowa	7/6/2011
648	[redacted]	Mount Joy	Pennsylvania	7/7/2011
649	[redacted]	VALREAS		7/8/2011
650	[redacted]	Kingston	New York	7/8/2011
651	[redacted]	East Hanover	New Jersey	7/8/2011
652	[redacted]	Edmonton	Alabama	7/8/2011
653	[redacted]	New York	New York	7/9/2011
654	[redacted]	jacksonville	Florida	7/9/2011
655	[redacted]	Hof		7/10/2011
656	[redacted]	Lexington	Kentucky	7/11/2011
657	[redacted]	rego park	New York	7/11/2011
658	[redacted]	Gdynia		7/12/2011
659	[redacted]	San Diego	California	7/12/2011
660	[redacted]	Scituate	Massachusetts	7/12/2011
661	[redacted]	Merritt Island	Florida	7/13/2011
662	[redacted]	Davenport	Iowa	7/15/2011
663	[redacted]	Phoenix	Arizona	7/15/2011
664	[redacted]	Inlet	New York	7/15/2011
665	[redacted]	Tucson	Arizona	7/16/2011
666	[redacted]	vancouver		7/16/2011
667	[redacted]	Tucson	Arizona	7/17/2011
668	[redacted]	Glen Carbon	Illinois	7/23/2011
669	[redacted]	Philadelphia	Pennsylvania	7/25/2011
670	[redacted]	shelbyville	Tennessee	7/25/2011
671	[redacted]	Paris		7/27/2011
672	[redacted]	Trenton		7/27/2011
673	[redacted]	verona		7/28/2011

	Name	City	State	Date
674	[redacted]	Whitsett	North Carolina	7/28/2011
675	[redacted]	clarkdale	Arizona	7/29/2011
676	[redacted]	Vilanova del CamÃ-		7/31/2011
677	[redacted]	Medicina, Bologna		7/31/2011
678	[redacted]	Old bridge	New Jersey	8/1/2011
679	[redacted]	Highland Park	New Jersey	8/3/2011
680	[redacted]	Highland Park	New Jersey	8/4/2011
681	[redacted]	Portland	Oregon	8/4/2011
682	[redacted]	browns mills	New Jersey	8/7/2011
683	[redacted]	south amboy	New Jersey	8/7/2011
684	[redacted]	Columbus	Ohio	8/8/2011
685	[redacted]	Hazel Park	Michigan	8/9/2011
686	[redacted]	Medford	Massachusetts	8/10/2011
687	[redacted]	Metuchen	New Jersey	8/10/2011
688	[redacted]	Wadsworth	Ohio	8/11/2011
689	[redacted]	Rye	New York	8/11/2011
690	[redacted]	Tecumseh	Missouri	8/11/2011
691	[redacted]	camden	New Jersey	8/11/2011
692	[redacted]	Eugene	Oregon	8/11/2011
693	[redacted]	Cincinnati	Ohio	8/11/2011
694	[redacted]	Radium Springs	New Mexico	8/11/2011
695	[redacted]	Holton	Indiana	8/11/2011
696	[redacted]	CHARLESTON	West Virginia	8/11/2011
697	[redacted]	Columbus	Indiana	8/12/2011
698	[redacted]	Gloucester City	New Jersey	8/12/2011
699	[redacted]	Billerica	Massachusetts	8/12/2011
700	[redacted]	Lindenhurst	Illinois	8/12/2011
701	[redacted]	Feeding Hills	Massachusetts	8/12/2011
702	[redacted]	Bedminster	New Jersey	8/13/2011
703	[redacted]	Columbia	Maryland	8/13/2011
704	[redacted]	Norristown	Pennsylvania	8/13/2011
705	[redacted]	Ellicott City	Maryland	8/13/2011
706	[redacted]	Lexington	South Carolina	8/13/2011
707	[redacted]	Brandon	South Dakota	8/13/2011
708	[redacted]	Aveiro		8/14/2011
709	[redacted]	Oldsmar	Florida	8/14/2011
710	[redacted]	Wayne	New Jersey	8/14/2011
711	[redacted]	Old Hickory	Tennessee	8/17/2011
712	[redacted]	Teaneck	New Jersey	8/18/2011
713	[redacted]	Edison	New Jersey	8/18/2011
714	[redacted]	Morrice	Michigan	8/19/2011
715	[redacted]	Roseburg	Oregon	8/20/2011
716	[redacted]	langhorne	Pennsylvania	8/24/2011
717	[redacted]	Ringwood	New Jersey	8/24/2011
718	[redacted]	holiday	Florida	8/25/2011

	Name	City	State	Date
719	[redacted]	East Brunswick	New Jersey	8/26/2011
720	[redacted]	Raritan	New Jersey	8/26/2011
721	[redacted]	Webster	Kentucky	8/26/2011
722	[redacted]	hobart	Indiana	8/26/2011
723	[redacted]	New Brunswick	New Jersey	8/26/2011
724	[redacted]			8/26/2011
725	[redacted]	Athens	Georgia	8/26/2011
726	[redacted]	Saline	Michigan	8/26/2011
727	[redacted]	palmdale	California	8/26/2011
728	[redacted]	Decatur	Texas	8/26/2011
729	[redacted]	Auburn	New York	8/26/2011
730	[redacted]	Long Branch	New Jersey	8/26/2011
731	[redacted]	Agawam	Massachusetts	8/26/2011
732	[redacted]	Morristown	Tennessee	8/26/2011
733	[redacted]	Webster	New York	8/26/2011
734	[redacted]	Woodland Park	New Jersey	8/26/2011
735	[redacted]	Los Angeles	California	8/26/2011
736	[redacted]	PEORIA	Arizona	8/26/2011
737	[redacted]	port colborne	California	8/26/2011
738	[redacted]	Staten Island	New York	8/27/2011
739	[redacted]	Branchburg	New Jersey	8/27/2011
740	[redacted]	Willoughby	Ohio	8/27/2011
741	[redacted]	Singapore		8/27/2011
742	[redacted]	Edison	New Jersey	8/27/2011
743	[redacted]	Thessaloniki	California	8/27/2011
744	[redacted]	Edison	New Jersey	8/27/2011
745	[redacted]	williamsburg	Virginia	8/27/2011
746	[redacted]	Linden	New Jersey	8/27/2011
747	[redacted]	parish	New York	8/27/2011
748	[redacted]	Mahwah	New Jersey	8/27/2011
749	[redacted]	Middle River	Maryland	8/27/2011
750	[redacted]	Covina	California	8/27/2011
751	[redacted]	Flanders	New Jersey	8/27/2011
752	[redacted]	Hillsborough	New Jersey	8/27/2011
753	[redacted]	Atlantic Beach	Florida	8/27/2011
754	[redacted]	Clermont	Florida	8/27/2011
755	[redacted]	edison	New Jersey	8/27/2011
756	[redacted]	Ridgewood	New York	8/27/2011
757	[redacted]	Bound Brook	New Jersey	8/27/2011
758	[redacted]	Phx	Arizona	8/27/2011
759	[redacted]	Bound Brook	New Jersey	8/27/2011
760	[redacted]	Bound Brook	New Jersey	8/27/2011
761	[redacted]	Kittery Point	Maine	8/27/2011
762	[redacted]	Cranston	Rhode Island	8/27/2011
763	[redacted]	Washington	District Of Columbia	8/27/2011

	Name	City	State	Date
764	[redacted]	Fayetteville	North Carolina	8/27/2011
765	[redacted]	Dallas	Texas	8/27/2011
766	[redacted]	Chicago	Illinois	8/27/2011
767	[redacted]	Martinsville	Indiana	8/27/2011
768	[redacted]	Biloxi	Mississippi	8/27/2011
769	[redacted]	Clearwater	Florida	8/27/2011
770	[redacted]	ringwood	New Jersey	8/27/2011
771	[redacted]	frenchtown	New Jersey	8/27/2011
772	[redacted]	Pittsburgh	Pennsylvania	8/27/2011
773	[redacted]	Land O Lakes	Florida	8/27/2011
774	[redacted]	Seattle	Washington	8/27/2011
775	[redacted]	apple valley	California	8/27/2011
776	[redacted]	somerville	New Jersey	8/28/2011
777	[redacted]	Mosinee	Wisconsin	8/28/2011
778	[redacted]	SACRAMENTO	California	8/28/2011
779	[redacted]	Middletown	Maryland	8/28/2011
780	[redacted]	lincohn park	New Jersey	8/28/2011
781	[redacted]	Seattle	Washington	8/28/2011
782	[redacted]	Metuchen	New Jersey	8/28/2011
783	[redacted]	CasÃ©vel		8/28/2011
784	[redacted]	Strathmore	Alabama	8/28/2011
785	[redacted]	Glen Gardner	New Jersey	8/28/2011
786	[redacted]	Edison	New Jersey	8/28/2011
787	[redacted]	Davers	Massachusetts	8/28/2011
788	[redacted]	East Orange	New Jersey	8/28/2011
789	[redacted]	Leander	Texas	8/28/2011
790	[redacted]	Arlington	Texas	8/28/2011
791	[redacted]			8/28/2011
792	[redacted]	Hope	Idaho	8/28/2011
793	[redacted]	Chicopee	Massachusetts	8/28/2011
794	[redacted]	morgantown	West Virginia	8/28/2011
795	[redacted]	Chicago	Illinois	8/28/2011
796	[redacted]	baltimore	Maryland	8/28/2011
797	[redacted]	Fort Lee	New Jersey	8/28/2011
798	[redacted]	Somerset	New Jersey	8/29/2011
799	[redacted]	bridgewater	New Jersey	8/29/2011
800	[redacted]	highland park	New Jersey	8/29/2011
801	[redacted]	Bridgewater	New Jersey	8/29/2011
802	[redacted]	South Bound Brook	New Jersey	8/29/2011
803	[redacted]	LAS VEGAS	Nevada	8/29/2011
804	[redacted]	somewhere	New Jersey	8/29/2011
805	[redacted]	LAS VEGAS	Nevada	8/29/2011
806	[redacted]	Atlantic Beach	Florida	8/29/2011
807	[redacted]			8/29/2011
808	[redacted]	Berkeley	California	8/29/2011

	Name	City	State	Date
809	[redacted]	frankyn	Wisconsin	8/29/2011
810	[redacted]	iselin	New Jersey	8/29/2011
811	[redacted]	Silver Spring	Maryland	8/29/2011
812	[redacted]	port of spain		8/29/2011
813	[redacted]	LOWELL	Massachusetts	8/29/2011
814	[redacted]	Los Angeles	California	8/29/2011
815	[redacted]	London	Michigan	8/29/2011
816	[redacted]	a	Texas	8/29/2011
817	[redacted]	galloway	New Jersey	8/29/2011
818	[redacted]	Tucson	Arizona	8/29/2011
819	[redacted]	Los Angeles	California	8/30/2011
820	[redacted]	Rochester	New York	8/30/2011
821	[redacted]	Seattle	Washington	8/30/2011
822	[redacted]	Gainesville	Florida	8/30/2011
823	[redacted]	Columbus	Ohio	8/30/2011
824	[redacted]	London	Massachusetts	8/30/2011
825	[redacted]	Raleigh	North Carolina	8/30/2011
826	[redacted]	Raleigh	North Carolina	8/30/2011
827	[redacted]	clarksville	Tennessee	8/30/2011
828	[redacted]	West Lafayette	Indiana	8/30/2011
829	[redacted]	glen haven	Colorado	8/30/2011
830	[redacted]	prescott	Arizona	8/30/2011
831	[redacted]	Laramie	Wyoming	8/30/2011
832	[redacted]	Cincinnati	Ohio	8/30/2011
833	[redacted]	Milwaukee	Wisconsin	8/30/2011
834	[redacted]	Santa Fe	New Mexico	8/30/2011
835	[redacted]	San Francisco	California	8/30/2011
836	[redacted]	valley stream	New York	8/30/2011
837	[redacted]	Woodbury	Minnesota	8/30/2011
838	[redacted]	Pt. Arena	California	8/30/2011
839	[redacted]	hurst	Texas	8/30/2011
840	[redacted]	Glendale	Arizona	8/30/2011
841	[redacted]	Columbus	Ohio	8/30/2011
842	[redacted]	Dilworth	Minnesota	8/30/2011
843	[redacted]	Jacksonville	Florida	8/30/2011
844	[redacted]	Winter Park	Florida	8/30/2011
845	[redacted]	east rochester	New York	8/30/2011
846	[redacted]	Brooklyn	New York	8/30/2011
847	[redacted]	Winfield	Illinois	8/30/2011
848	[redacted]	new york	New York	8/30/2011
849	[redacted]	Suffern	New York	8/30/2011
850	[redacted]	METUCHEN	New Jersey	8/30/2011
851	[redacted]	Eureka	California	8/30/2011
852	[redacted]	Blomsterdalen	Alaska	8/31/2011
853	[redacted]	Compton	California	8/31/2011

	Name	City	State	Date
854	[redacted]	Maysville	Kentucky	8/31/2011
855	[redacted]	Delhi		8/31/2011
856	[redacted]	Trenton	Tennessee	8/31/2011
857	[redacted]	Petersburg	Virginia	8/31/2011
858	[redacted]	Louisville	Kentucky	8/31/2011
859	[redacted]	hoffman estates	Illinois	8/31/2011
860	[redacted]	Wichita Falls	Texas	8/31/2011
861	[redacted]	Indianapolis	Indiana	8/31/2011
862	[redacted]	Monroe	Michigan	8/31/2011
863	[redacted]	Southlake	Texas	8/31/2011
864	[redacted]	manteca	California	8/31/2011
865	[redacted]	Southington	Ohio	8/31/2011
866	[redacted]	Etobicoke	Ohio	8/31/2011
867	[redacted]	Midland	Texas	8/31/2011
868	[redacted]	Los Angeles	California	8/31/2011
869	[redacted]	Elmwood Park	New Jersey	8/31/2011
870	[redacted]	Colorado Springs	Colorado	8/31/2011
871	[redacted]	Little Rock	Arkansas	8/31/2011
872	[redacted]	Phoenix	Arizona	8/31/2011
873	[redacted]	New City	New York	8/31/2011
874	[redacted]	Tampa	Florida	8/31/2011
875	[redacted]	eaton	Ohio	8/31/2011
876	[redacted]	Colorado Springs	Colorado	8/31/2011
877	[redacted]	portland	Connecticut	8/31/2011
878	[redacted]	Rock Hill	South Carolina	8/31/2011
879	[redacted]	toronto	California	8/31/2011
880	[redacted]	zanesville	Ohio	8/31/2011
881	[redacted]	North Wales	Pennsylvania	9/1/2011
882	[redacted]	Hendersonville	North Carolina	9/1/2011
883	[redacted]	endicott	New York	9/1/2011
884	[redacted]	New Castle	Delaware	9/1/2011
885	[redacted]	Katy	Texas	9/1/2011
886	[redacted]	North Plainfield	New Jersey	9/1/2011
887	[redacted]	Acton	Massachusetts	9/1/2011
888	[redacted]	Knox	Indiana	9/1/2011
889	[redacted]	Rigewood	New York	9/1/2011
890	[redacted]	Lexington	Texas	9/1/2011
891	[redacted]	greenville	South Carolina	9/1/2011
892	[redacted]	Pacoima	California	9/1/2011
893	[redacted]	Goodyear	Arizona	9/1/2011
894	[redacted]	Williamsville	New York	9/1/2011
895	[redacted]	Los Angeles	California	9/1/2011
896	[redacted]	Glendale	California	9/1/2011
897	[redacted]	San Bernardino	California	9/1/2011
898	[redacted]	Orlando	Florida	9/1/2011

	Name	City	State	Date
899	[redacted]	singapore	Alabama	9/1/2011
900	[redacted]	cotati	California	9/1/2011
901	[redacted]	Show Low	Arizona	9/1/2011
902	[redacted]	Oakland	California	9/1/2011
903	[redacted]	Spencerport	New York	9/1/2011
904	[redacted]	Henderson	Nevada	9/1/2011
905	[redacted]	Long Island City	New York	9/1/2011
906	[redacted]	Helsinki		9/2/2011
907	[redacted]	Greenville	Rhode Island	9/2/2011
908	[redacted]	barneveld	New York	9/2/2011
909	[redacted]	Raleigh	North Carolina	9/2/2011
910	[redacted]	Sanford	Florida	9/2/2011
911	[redacted]	Colton	Oregon	9/2/2011
912	[redacted]	Sea Bright	New Jersey	9/2/2011
913	[redacted]	Salida	Colorado	9/2/2011
914	[redacted]	Metuchen	New Jersey	9/2/2011
915	[redacted]	DeBary	Florida	9/2/2011
916	[redacted]	morristown	New Jersey	9/2/2011
917	[redacted]	GAVERE		9/2/2011
918	[redacted]	Ellwood City	Pennsylvania	9/2/2011
919	[redacted]	New Orleans	Louisiana	9/2/2011
920	[redacted]	Mechanicsburg	Pennsylvania	9/2/2011
921	[redacted]	devore	California	9/2/2011
922	[redacted]	Sanford	Florida	9/2/2011
923	[redacted]	Chula Vista	California	9/2/2011
924	[redacted]	Leawood	Kansas	9/2/2011
925	[redacted]	Pleasant Hill	California	9/2/2011
926	[redacted]	Rangeley	Maine	9/2/2011
927	[redacted]	Memphis	Tennessee	9/2/2011
928	[redacted]	Bend	Oregon	9/2/2011
929	[redacted]	Belle Glade	Florida	9/2/2011
930	[redacted]	La Jolla	California	9/2/2011
931	[redacted]	Glencoe	Illinois	9/2/2011
932	[redacted]	Santa Cruz	California	9/2/2011
933	[redacted]	Glen Burnie	Maryland	9/2/2011
934	[redacted]	pacific palisades	California	9/2/2011
935	[redacted]	Nottingham		9/3/2011
936	[redacted]	Compton	California	9/3/2011
937	[redacted]	Tucson	Arizona	9/3/2011
938	[redacted]	portland	Oregon	9/3/2011
939	[redacted]	Farwell	Michigan	9/3/2011
940	[redacted]	Pasig City		9/3/2011
941	[redacted]	Isabela	Puerto Rico	9/3/2011
942	[redacted]	Hospitalet del Llobregat	Northern Mariana Isla	9/3/2011
943	[redacted]	Hazel Park	Michigan	9/3/2011

	Name	City	State	Date
944	[redacted]	Delaware	Delaware	9/3/2011
945	[redacted]	Denver	Colorado	9/3/2011
946	[redacted]	Dover	Delaware	9/3/2011
947	[redacted]	St. Louis	Missouri	9/3/2011
948	[redacted]	Desert Hot Springs	California	9/3/2011
949	[redacted]	Toronto		9/3/2011
950	[redacted]	NY	New York	9/3/2011
951	[redacted]	philadelphia	Pennsylvania	9/3/2011
952	[redacted]	jacksonville nc	North Carolina	9/3/2011
953	[redacted]	Schiller Park	Illinois	9/3/2011
954	[redacted]	jackson	Georgia	9/3/2011
955	[redacted]	Colorado Springs	Colorado	9/3/2011
956	[redacted]	Boone	North Carolina	9/3/2011
957	[redacted]	Bellingham	Massachusetts	9/3/2011
958	[redacted]	bulverde	Texas	9/3/2011
959	[redacted]	Tavares	Florida	9/3/2011
960	[redacted]	La Crescenta	California	9/4/2011
961	[redacted]	Mumbai		9/4/2011
962	[redacted]	Miami	Florida	9/4/2011
963	[redacted]	Hawthorne	California	9/4/2011
964	[redacted]	Monticello	Iowa	9/4/2011
965	[redacted]	bahar ic caghaq		9/4/2011
966	[redacted]	Albuquerque	New Mexico	9/4/2011
967	[redacted]	Eaton	Ohio	9/4/2011
968	[redacted]	belfast northen ireland		9/4/2011
969	[redacted]	Santa Cruz	California	9/4/2011
970	[redacted]	Mississauga		9/4/2011
971	[redacted]	houston	Texas	9/4/2011
972	[redacted]	Alexandria	Virginia	9/4/2011
973	[redacted]	St. Louis	Missouri	9/4/2011
974	[redacted]	Brookshire	Texas	9/4/2011
975	[redacted]	Woodcliff Lake	New Jersey	9/4/2011
976	[redacted]	Chicago	Illinois	9/4/2011
977	[redacted]	Winthrop	New York	9/4/2011
978	[redacted]	29 Palms	California	9/4/2011
979	[redacted]	Sittard	Nebraska	9/4/2011
980	[redacted]	ewing	New Jersey	9/4/2011
981	[redacted]	Phoenix	Arizona	9/4/2011
982	[redacted]	ewing	New Jersey	9/4/2011
983	[redacted]	palestine	West Virginia	9/4/2011
984	[redacted]	Poughkeepsie	New York	9/4/2011
985	[redacted]	slidell	Louisiana	9/4/2011
986	[redacted]	torrington	Connecticut	9/4/2011
987	[redacted]	SEATTLE	Washington	9/4/2011
988	[redacted]	Richmond	Virginia	9/5/2011

	Name	City	State	Date
989	[redacted]	Manchester	New Hampshire	9/5/2011
990		Manville	New Jersey	9/5/2011
991		Brunn am Gebirge		9/5/2011
992		Woodbridge	New Jersey	9/5/2011
993		Bloomsbury	New Jersey	9/5/2011
994		Bound Brook	New Jersey	9/5/2011
995		Ibiza-Spain		9/5/2011
996		BOUND BROOK	New Jersey	9/5/2011
997		edison	New Jersey	9/5/2011
998		Bridgewater	New Jersey	9/5/2011
999		East Brunswick	New Jersey	9/5/2011
1000		Dunellen	New Jersey	9/5/2011
1001		Somerset	New Jersey	9/5/2011
1002		middlesex	New Jersey	9/5/2011
1003		somerset	New Jersey	9/5/2011
1004		Hillsborough	New Jersey	9/5/2011
1005		Minneapolis	Minnesota	9/5/2011
1006		Bound Brook	New Jersey	9/5/2011
1007		Bridgewater	New Jersey	9/5/2011
1008		Somerset	New Jersey	9/5/2011
1009		Montclair	New Jersey	9/5/2011
1010		Ossining	New York	9/5/2011
1011		Santos		9/5/2011
1012		Hillsborough	New Jersey	9/5/2011
1013		Lemont	Illinois	9/5/2011
1014		Hawley	Pennsylvania	9/5/2011
1015		valencia		9/5/2011
1016		Monmouth Jct	New Jersey	9/5/2011
1017		Monmouth Junction	New Jersey	9/5/2011
1018		Richfield	Minnesota	9/5/2011
1019		Somewhere	Nebraska	9/5/2011
1020		Toms River	New Jersey	9/5/2011
1021		Middlesex	New Jersey	9/5/2011
1022		Dunellen	New Jersey	9/5/2011
1023		Frankfurt	Alabama	9/5/2011
1024		Union	New Jersey	9/5/2011
1025		Purcell	Oklahoma	9/5/2011
1026		highland park	New Jersey	9/5/2011
1027		Orange	California	9/5/2011
1028		Portland	Oregon	9/5/2011
1029		Allentown	Pennsylvania	9/5/2011
1030		Hacienda Heights	California	9/5/2011
1031		Braga	Indiana	9/6/2011
1032		Cenusco sul naviglio		9/6/2011
1033		melksham	New York	9/6/2011

	Name	City	State	Date
1034	[redacted]	Lisbon		9/6/2011
1035	[redacted]	North Hollywood	California	9/6/2011
1036	[redacted]	bound brook	New Jersey	9/6/2011
1037	[redacted]	Brijdorpe	Alabama	9/6/2011
1038	[redacted]	Old Bridge	New Jersey	9/6/2011
1039	[redacted]	Hoboken	New Jersey	9/6/2011
1040	[redacted]	cranbury	New Jersey	9/6/2011
1041	[redacted]	Orange City	Florida	9/6/2011
1042	[redacted]	manville	New Jersey	9/6/2011
1043	[redacted]	Hillsborough	New Jersey	9/6/2011
1044	[redacted]	Bound Brook	New Jersey	9/6/2011
1045	[redacted]	Warren	New Jersey	9/6/2011
1046	[redacted]	Cary	North Carolina	9/6/2011
1047	[redacted]	Bridgewater	New Jersey	9/6/2011
1048	[redacted]	new york city	New York	9/6/2011
1049	[redacted]	Hillsborough	New Jersey	9/6/2011
1050	[redacted]	Avellaneda	New Jersey	9/6/2011
1051	[redacted]	Portland	Oregon	9/6/2011
1052	[redacted]	Manville	New Jersey	9/6/2011
1053	[redacted]	Concord	California	9/6/2011
1054	[redacted]	Yuma	Arizona	9/6/2011
1055	[redacted]	Somerset	New Jersey	9/6/2011
1056	[redacted]	Somerset	New Hampshire	9/6/2011
1057	[redacted]	St. Louis	Missouri	9/6/2011
1058	[redacted]	Hopkins	Minnesota	9/6/2011
1059	[redacted]	Warren	New Jersey	9/6/2011
1060	[redacted]	calgary	Connecticut	9/6/2011
1061	[redacted]	Warren	New Jersey	9/6/2011
1062	[redacted]	Iselin	New Jersey	9/6/2011
1063	[redacted]	carlsbad	California	9/6/2011
1064	[redacted]	Ichiharashi		9/6/2011
1065	[redacted]	Emmaus	Pennsylvania	9/6/2011
1066	[redacted]	Aledo	Texas	9/6/2011
1067	[redacted]	Istanbul		9/7/2011
1068	[redacted]	chiba		9/7/2011
1069	[redacted]	igualada	Idaho	9/7/2011
1070	[redacted]	Chiba		9/7/2011
1071	[redacted]	camden	New Jersey	9/7/2011
1072	[redacted]	Hamilton	New Jersey	9/7/2011
1073	[redacted]	Belo Horizonte		9/7/2011
1074	[redacted]	Cuyahoga Falls	Ohio	9/7/2011
1075	[redacted]	Decatur	Illinois	9/7/2011
1076	[redacted]	Sarasota	Florida	9/7/2011
1077	[redacted]	PEORIA	Illinois	9/7/2011
1078	[redacted]	Palo Alto	California	9/7/2011

	Name	City	State	Date
1079	[redacted]	Karlsruhe		9/7/2011
1080	[redacted]	BÃ¤retswil	Iowa	9/7/2011
1081	[redacted]	cork		9/7/2011
1082	[redacted]	Granger	Indiana	9/7/2011
1083	[redacted]	Torino	New York	9/7/2011
1084	[redacted]	Nooo	California	9/7/2011
1085	[redacted]	Summit	New Jersey	9/7/2011
1086	[redacted]	STAFFORD	Virginia	9/7/2011
1087	[redacted]	Steuben	Maine	9/7/2011
1088	[redacted]	BRAMPTON	Arizona	9/7/2011
1089	[redacted]	Sherwood	Arkansas	9/7/2011
1090	[redacted]	Long Beach	California	9/7/2011
1091	[redacted]	George West	Texas	9/8/2011
1092	[redacted]	Adelaide		9/8/2011
1093	[redacted]	Pelham	New Hampshire	9/8/2011
1094	[redacted]	Boone	North Carolina	9/8/2011
1095	[redacted]	BRONX	New York	9/8/2011
1096	[redacted]	Maineville	Ohio	9/8/2011
1097	[redacted]	Capitan	New Mexico	9/8/2011
1098	[redacted]	Phoenix	Arizona	9/8/2011
1099	[redacted]	chicago	Illinois	9/8/2011
1100	[redacted]	Valley Springs	California	9/8/2011
1101	[redacted]	Parma Heights	Ohio	9/8/2011
1102	[redacted]	McGregor	Minnesota	9/8/2011
1103	[redacted]	Georgetown University	District Of Columbia	9/8/2011
1104	[redacted]	Palatine,	Illinois	9/8/2011
1105	[redacted]	waterford		9/8/2011
1106	[redacted]	mt horeb	Wisconsin	9/8/2011
1107	[redacted]	Crestwood	Illinois	9/8/2011
1108	[redacted]	the woodlands	Texas	9/8/2011
1109	[redacted]	Bradford	Pennsylvania	9/8/2011
1110	[redacted]	Farmington Hills	Michigan	9/8/2011
1111	[redacted]	Suffern	New York	9/8/2011
1112	[redacted]	San Francisco	California	9/9/2011
1113	[redacted]	austin	Texas	9/9/2011
1114	[redacted]	bound brook	New Jersey	9/9/2011
1115	[redacted]	Weehawken	New Jersey	9/9/2011
1116	[redacted]	Millers	Maryland	9/9/2011
1117	[redacted]	Columbus	Ohio	9/9/2011
1118	[redacted]	Merrillville	Indiana	9/9/2011
1119	[redacted]	Gillette	New Jersey	9/9/2011
1120	[redacted]	Basel		9/9/2011
1121	[redacted]	123	Alabama	9/9/2011
1122	[redacted]	Kent	Connecticut	9/9/2011
1123	[redacted]	Pleasant Lake	Michigan	9/9/2011

	Name	City	State	Date
1124	[redacted]	Olympia	Washington	9/9/2011
1125	[redacted]	Denver	Colorado	9/9/2011
1126	[redacted]	Denver	Colorado	9/9/2011
1127	[redacted]	Lexington	Kentucky	9/9/2011
1128	[redacted]	Grand Junction	Michigan	9/9/2011
1129	[redacted]	Berkeley	California	9/9/2011
1130	[redacted]	Montpelier	Vermont	9/10/2011
1131	[redacted]	st louis	Missouri	9/10/2011
1132	[redacted]	Los Angeles	California	9/10/2011
1133	[redacted]	Denver	Colorado	9/10/2011
1134	[redacted]	Edison	New Jersey	9/10/2011
1135	[redacted]	silver spring	Maryland	9/10/2011
1136	[redacted]	Abbeville	Georgia	9/10/2011
1137	[redacted]	union city	California	9/10/2011
1138	[redacted]	piscataway	New Jersey	9/10/2011
1139	[redacted]	St. Paul	Minnesota	9/10/2011
1140	[redacted]	Redmond	Oregon	9/10/2011
1141	[redacted]	Hillsbourough	New Jersey	9/10/2011
1142	[redacted]	ft myers	Florida	9/10/2011
1143	[redacted]	South Pasadena	California	9/10/2011
1144	[redacted]	Anaheim	California	9/10/2011
1145	[redacted]	Visalia	California	9/10/2011
1146	[redacted]	Houston	Texas	9/11/2011
1147	[redacted]	Manville	New Jersey	9/11/2011
1148	[redacted]	Columbus	Ohio	9/11/2011
1149	[redacted]	nashville	Tennessee	9/11/2011
1150	[redacted]	West Chicago	Illinois	9/11/2011
1151	[redacted]	Peoria	Arizona	9/11/2011
1152	[redacted]	Long Branch	New Jersey	9/11/2011
1153	[redacted]	Beacon Falls	Connecticut	9/11/2011
1154	[redacted]	Mankto	Minnesota	9/11/2011
1155	[redacted]	Lawrence	Kansas	9/11/2011
1156	[redacted]	Santa Cruz	California	9/11/2011
1157	[redacted]	Louisville	Kentucky	9/11/2011
1158	[redacted]	Milwaukee	Wisconsin	9/11/2011
1159	[redacted]	portland	Oregon	9/11/2011
1160	[redacted]	Charleston	South Carolina	9/11/2011
1161	[redacted]	Pensacola	Florida	9/11/2011
1162	[redacted]	Riverside	Rhode Island	9/11/2011
1163	[redacted]	Bronx, New York	New York	9/11/2011
1164	[redacted]	NMB	South Carolina	9/11/2011
1165	[redacted]	Fountain Hill	Pennsylvania	9/11/2011
1166	[redacted]	Bristol	Virginia	9/11/2011
1167	[redacted]	Goleta	California	9/11/2011
1168	[redacted]	Omaha	Nebraska	9/11/2011

	Name	City	State	Date
116	[redacted]	El Paso	Texas	9/11/2011
117	[redacted]	Seattle	Washington	9/11/2011
117	[redacted]	hayward	California	9/11/2011
117	[redacted]	Nicosia		9/11/2011
117	[redacted]	East Lansing	Michigan	9/11/2011
117	[redacted]	new york	New York	9/11/2011
117	[redacted]	Kissimmee	Florida	9/11/2011
117	[redacted]	Glenside	Pennsylvania	9/11/2011
117	[redacted]	holliday	Texas	9/11/2011
117	[redacted]	San Francisco	California	9/11/2011
117	[redacted]	Markham		9/11/2011
1180	[redacted]	North Armagh		9/11/2011
1181	[redacted]	Hempstead	New York	9/11/2011
1182	[redacted]	Brooklyn	New York	9/11/2011
1183	[redacted]	Martins Ferry	Ohio	9/11/2011
1184	[redacted]	san marcos	Texas	9/12/2011
1185	[redacted]	Oklahoma City	Oklahoma	9/12/2011
1186	[redacted]	Menlo Park	California	9/12/2011
1187	[redacted]	Washington	District Of Columbia	9/12/2011
1188	[redacted]	Swansea	Massachusetts	9/12/2011
1189	[redacted]	los Angeles		9/12/2011
1190	[redacted]	firestone	Colorado	9/12/2011
1191	[redacted]	Willard	Ohio	9/12/2011
1192	[redacted]	warminster	Pennsylvania	9/12/2011
1193	[redacted]	bridgewater	New Jersey	9/12/2011
1194	[redacted]	Caguas	Puerto Rico	9/12/2011
1195	[redacted]	Noblesville	Indiana	9/12/2011
1196	[redacted]	Riverview	Florida	9/12/2011
1197	[redacted]	Tampere	Florida	9/12/2011
1198	[redacted]	stratford	New Jersey	9/12/2011
1199	[redacted]	Perkins	Oklahoma	9/12/2011
1200	[redacted]	Indianapolis	Indiana	9/12/2011
1201	[redacted]	Melbourne	Florida	9/12/2011
1202	[redacted]	Croton on Hudson	New York	9/12/2011
1203	[redacted]	albuquerque	New Mexico	9/12/2011
1204	[redacted]	morristown	New Jersey	9/12/2011
1205	[redacted]	lafayette	Louisiana	9/12/2011
1206	[redacted]	San Jose	California	9/12/2011
1207	[redacted]	los angeles	California	9/13/2011
1208	[redacted]	Auburndale	Massachusetts	9/13/2011
1209	[redacted]	Towson	Maryland	9/13/2011
1210	[redacted]	Austin	Texas	9/13/2011
1211	[redacted]	Gilbert	Arizona	9/13/2011
1212	[redacted]	Tyler	Texas	9/13/2011
1213	[redacted]	Phoenix	Arizona	9/13/2011

	Name	City	State	Date
1214	[redacted]	phila	Pennsylvania	9/13/2011
1215	[redacted]	Cincinnati	Ohio	9/13/2011
1216	[redacted]	fort valley	Virginia	9/13/2011
1217	[redacted]	Louisville	Kentucky	9/13/2011
1218	[redacted]	Cary	North Carolina	9/13/2011
1219	[redacted]	Katy	Texas	9/13/2011
1220	[redacted]	Cottage Grove	Minnesota	9/13/2011
1221	[redacted]	Purvis	Mississippi	9/13/2011
1222	[redacted]	southport	North Carolina	9/13/2011
1223	[redacted]	Lombard	Illinois	9/13/2011
1224	[redacted]	Apache Junction	Arizona	9/14/2011
1225	[redacted]	atlanta,	Georgia	9/14/2011
1226	[redacted]	frisco	Texas	9/14/2011
1227	[redacted]	Milano	Virginia	9/14/2011
1228	[redacted]	Bundang	New York	9/14/2011
1229	[redacted]	New York	New York	9/14/2011
1230	[redacted]	Winchester	Virginia	9/14/2011
1231	[redacted]	Alpharetta	Georgia	9/14/2011
1232	[redacted]	Riverton	New Jersey	9/15/2011
1233	[redacted]	Austin	Texas	9/15/2011
1234	[redacted]	north brunswick	New Jersey	9/15/2011
1235	[redacted]	Palmerton	Pennsylvania	9/15/2011
1236	[redacted]	UDINE	Alaska	9/15/2011
1237	[redacted]	Brooklyn	New York	9/15/2011
1238	[redacted]	Gaithersburg	Maryland	9/15/2011
1239	[redacted]	Phoenix	Arizona	9/15/2011
1240	[redacted]	Medford	Oregon	9/15/2011
1241	[redacted]	Deer Park	Washington	9/15/2011
1242	[redacted]	Chicago	Illinois	9/16/2011
1243	[redacted]	Perth		9/16/2011
1244	[redacted]	Poughkeepsie	New York	9/16/2011
1245	[redacted]	st.petersburg	Florida	9/16/2011
1246	[redacted]	Bowling Green	Ohio	9/16/2011
1247	[redacted]	Phoenix	Arizona	9/16/2011
1248	[redacted]	Great NEck	New York	9/16/2011
1249	[redacted]	mahwah	New Jersey	9/16/2011
1250	[redacted]	warminster	Pennsylvania	9/17/2011
1251	[redacted]	Orrefors		9/17/2011
1252	[redacted]	East Brunswick	New Jersey	9/17/2011
1253	[redacted]	Limassol		9/17/2011
1254	[redacted]	Postville	Iowa	9/17/2011
1255	[redacted]	Carolina Beach	North Carolina	9/17/2011
1256	[redacted]	bordeaux FRANCE		9/17/2011
1257	[redacted]	Buffalo	New York	9/17/2011
1258	[redacted]	EL CERRITO	California	9/17/2011

	Name	City	State	Date
1259	[redacted]	San Diego	California	9/17/2011
1260	[redacted]	redding	California	9/17/2011
1261	[redacted]	Wigan		9/17/2011
1262	[redacted]	hyderabad		9/18/2011
1263	[redacted]	Memmingen	Delaware	9/18/2011
1264	[redacted]	Enfield		9/18/2011
1265	[redacted]	Alexandria	Virginia	9/18/2011
1266	[redacted]	Los Angeles	California	9/18/2011
1267	[redacted]	Foresthill	California	9/18/2011
1268	[redacted]	Portland	Oregon	9/18/2011
1269	[redacted]	Portland	Oregon	9/18/2011
1270	[redacted]	Platteville	Wisconsin	9/18/2011
1271	[redacted]	Berlin	Arizona	9/19/2011
1272	[redacted]	Virginia Beach	Virginia	9/19/2011
1273	[redacted]	Clearwater	Florida	9/19/2011
1274	[redacted]	Marshfield	Wisconsin	9/19/2011
1275	[redacted]	Madison	Wisconsin	9/19/2011
1276	[redacted]	Unionville	Connecticut	9/19/2011
1277	[redacted]	aiken	South Carolina	9/19/2011
1278	[redacted]	Christchurch		9/20/2011
1279	[redacted]	Rugby		9/20/2011
1280	[redacted]	Grawn	Michigan	9/20/2011
1281	[redacted]	CHESTER	Vermont	9/20/2011
1282	[redacted]	Chesterfield	Missouri	9/20/2011
1283	[redacted]	Holland	Michigan	9/20/2011
1284	[redacted]	newport	Maine	9/20/2011
1285	[redacted]	Johannesburg		9/20/2011
1286	[redacted]	Miami	Florida	9/20/2011
1287	[redacted]	galt	California	9/20/2011
1288	[redacted]	Oak Creek	Wisconsin	9/20/2011
1289	[redacted]	tama	Iowa	9/20/2011
1290	[redacted]	Hatfield	Pennsylvania	9/21/2011
1291	[redacted]	schirrhein	Florida	9/21/2011
1292	[redacted]	Cortland	New York	9/21/2011
1293	[redacted]	Oklahoma City	Oklahoma	9/21/2011
1294	[redacted]	Worcester	Massachusetts	9/21/2011
1295	[redacted]	Miami	Florida	9/21/2011
1296	[redacted]	Swannanoa	North Carolina	9/21/2011
1297	[redacted]	south Orange	New Jersey	9/22/2011
1298	[redacted]	Fairmont	West Virginia	9/22/2011
1299	[redacted]	washington	District Of Columbia	9/22/2011
1300	[redacted]	North Branford	Connecticut	9/22/2011
1301	[redacted]	Houghton Lake	Michigan	9/22/2011
1302	[redacted]	Nashua	New Hampshire	9/22/2011
1303	[redacted]	denver	Colorado	9/22/2011

	Name	City	State	Date
1304	[redacted]	Rowland Heights	California	9/22/2011
1305	[redacted]	LAS VEGAS	Nevada	9/22/2011
1306	[redacted]	Bronx	New York	9/22/2011
1307	[redacted]	reno	Nevada	9/22/2011
1308	[redacted]	goleta	California	9/22/2011
1309	[redacted]	Mesa	Arizona	9/22/2011
1310	[redacted]	West Covina	California	9/22/2011
1311	[redacted]	Stayton	Oregon	9/22/2011
1312	[redacted]	Charlotte	North Carolina	9/23/2011
1313	[redacted]	Tomball	Texas	9/23/2011
1314	[redacted]	Richboro	Pennsylvania	9/23/2011
1315	[redacted]	Colorado Springs	Colorado	9/23/2011
1316	[redacted]	citrus springs	Florida	9/23/2011
1317	[redacted]	Lansdowne	Pennsylvania	9/23/2011
1318	[redacted]	Dover	Delaware	9/23/2011
1319	[redacted]	Sacramento	California	9/23/2011
1320	[redacted]	Wheaton	Illinois	9/23/2011
1321	[redacted]	Spring	Texas	9/23/2011
1322	[redacted]	Imperial Beach	California	9/23/2011
1323	[redacted]	Cedar Rapids	Iowa	9/24/2011
1324	[redacted]	burbank Ca.	Alabama	9/24/2011
1325	[redacted]	Plano	Texas	9/24/2011
1326	[redacted]	Stevenage		9/24/2011
1327	[redacted]	North Miami Beach	Florida	9/24/2011
1328	[redacted]	seattle	Washington	9/24/2011
1329	[redacted]	arlington	Texas	9/24/2011
1330	[redacted]	Keene	New Hampshire	9/24/2011
1331	[redacted]	New York	New York	9/24/2011
1332	[redacted]	Lynnwood	Washington	9/24/2011
1333	[redacted]	Beloit	Wisconsin	9/24/2011
1334	[redacted]	San Pedro	California	9/24/2011
1335	[redacted]	Margao	Indiana	9/24/2011
1336	[redacted]	Edison	New Jersey	10/11/2011
1337	[redacted]	Seattle	Washington	10/11/2011
1338	[redacted]	philadelphia	Pennsylvania	10/11/2011
1339	[redacted]	Fort Myers	Florida	10/12/2011
1340	[redacted]	antwerp		10/12/2011
1341	[redacted]	Topanga	California	10/12/2011
1342	[redacted]	chicago	Illinois	10/12/2011
1343	[redacted]	new york	New York	10/12/2011
1344	[redacted]	New Haven	Connecticut	10/12/2011
1345	[redacted]	Miami	Florida	10/12/2011
1346	[redacted]	telluride	Colorado	10/12/2011
1347	[redacted]	Chicago	Illinois	10/12/2011
1348	[redacted]	Phoenix	Arizona	10/12/2011

	Name	City	State	Date
1349	[redacted]	reading	Pennsylvania	10/12/2011
1350	[redacted]	Jamestown	New York	10/12/2011
1351	[redacted]	Garfield Heights	Ohio	10/12/2011
1352	[redacted]	singapore		10/13/2011
1353	[redacted]	Seattle	Washington	10/13/2011
1354	[redacted]	Belle Mead	New Jersey	10/13/2011
1355	[redacted]	Fayetteville	North Carolina	10/13/2011
1356	[redacted]	North Park	Illinois	10/13/2011
1357	[redacted]	Monroe	North Carolina	10/13/2011
1358	[redacted]	Buffalo	New York	10/13/2011
1359	[redacted]	Aloha	Oregon	10/13/2011
1360	[redacted]	Yelm	Washington	10/14/2011
1361	[redacted]	Knoxville	Tennessee	10/14/2011
1362	[redacted]	Zanesville	Ohio	10/14/2011
1363	[redacted]	New York	New York	10/15/2011
1364	[redacted]	Desboro, Ontario		10/15/2011
1365	[redacted]	Biloxi	Mississippi	10/15/2011
1366	[redacted]	mahebourg		10/15/2011
1367	[redacted]	Riverside	Rhode Island	10/16/2011
1368	[redacted]	Vidor	Texas	10/16/2011
1369	[redacted]	Oradell	New Jersey	10/16/2011
1370	[redacted]	houston	Texas	10/16/2011
1371	[redacted]	Mesa	Arizona	10/16/2011
1372	[redacted]	Valencia	California	10/17/2011
1373	[redacted]	Edison	New Jersey	10/17/2011
1374	[redacted]	Alexandria	Virginia	10/17/2011
1375	[redacted]	Chicago	Illinois	10/18/2011
1376	[redacted]	Ferndale	Michigan	10/19/2011
1377	[redacted]	Sparta	Tennessee	10/19/2011
1378	[redacted]	Reno	Nevada	10/19/2011
1379	[redacted]	south ozone park	New York	10/19/2011
1380	[redacted]	Stephenville	Texas	10/19/2011
1381	[redacted]	Boronia	California	10/19/2011
1382	[redacted]	Spring City	Pennsylvania	10/20/2011
1383	[redacted]	pittsburgh	Pennsylvania	10/20/2011
1384	[redacted]	Bronx	New York	10/20/2011
1385	[redacted]	Orange	California	10/20/2011
1386	[redacted]	Chevy Chase	Maryland	10/20/2011
1387	[redacted]	Batavia	Ohio	10/20/2011
1388	[redacted]	Jamesport	New York	10/20/2011
1389	[redacted]	Missoula	Montana	10/20/2011
1390	[redacted]	Taree		10/20/2011
1391	[redacted]	Manassas	Virginia	10/20/2011
1392	[redacted]	Indianapolis	Indiana	10/20/2011
1393	[redacted]	Dundas		10/20/2011

	Name	City	State	Date
1394	[redacted]	fairfax	Virginia	10/20/2011
1395	[redacted]	Indianapolis		10/20/2011
1396	[redacted]	valencia	Washington	10/21/2011
1397	[redacted]	port pirie		10/21/2011
1398	[redacted]	Helsinki	Nebraska	10/21/2011
1399	[redacted]	North Brunswick	New Jersey	10/21/2011
1400	[redacted]	San Francisco	California	10/22/2011
1401	[redacted]	Houston	Texas	10/22/2011
1402	[redacted]	Boulder	Colorado	10/22/2011
1403	[redacted]	Iowa City	Iowa	10/23/2011
1404	[redacted]	Muncie	Indiana	10/23/2011
1405	[redacted]	Leburn	Kentucky	10/23/2011
1406	[redacted]	Bourbonnais	Illinois	10/23/2011
1407	[redacted]	Tucson	Arizona	10/23/2011
1408	[redacted]	New York	New York	10/23/2011
1409	[redacted]	Charlotte	North Carolina	10/23/2011
1410	[redacted]	Eugene	Oregon	10/23/2011
1411	[redacted]	Ulen	Minnesota	10/23/2011
1412	[redacted]	rochester	New York	10/23/2011
1413	[redacted]	Normal	Illinois	10/23/2011
1414	[redacted]	Colorado Springs	Colorado	10/23/2011
1415	[redacted]	NY	New York	10/24/2011
1416	[redacted]	Edinboro	Pennsylvania	10/24/2011
1417	[redacted]	Dover	New Jersey	10/24/2011
1418	[redacted]	Los Angeles	California	10/24/2011
1419	[redacted]	Riverside	Illinois	10/25/2011
1420	[redacted]	Ann Arbor	Michigan	10/25/2011
1421	[redacted]	homestead	Florida	10/25/2011
1422	[redacted]	Niskayuna	New York	10/25/2011
1423	[redacted]	Greensburg	Indiana	10/25/2011
1424	[redacted]	Beaverton	Oregon	10/25/2011
1425	[redacted]	lewisburg	Pennsylvania	10/25/2011
1426	[redacted]	Highland Park	New Jersey	10/26/2011
1427	[redacted]	Ljubljana		10/26/2011
1428	[redacted]	Seguin	Texas	10/26/2011
1429	[redacted]	Montebello	California	10/26/2011
1430	[redacted]	englewood	New Jersey	10/26/2011
1431	[redacted]	Williamsburg	Virginia	10/26/2011
1432	[redacted]	Vero Beach	Florida	10/26/2011
1433	[redacted]	Staten Island	New York	10/26/2011
1434	[redacted]	Rimini		10/26/2011
1435	[redacted]	Branchburg	New Jersey	10/26/2011
1436	[redacted]	Neshanic Station	New Jersey	10/27/2011
1437	[redacted]	lynn	Massachusetts	10/27/2011
1438	[redacted]	Olney	Maryland	10/27/2011

	Name	City	State	Date
143	[redacted]	Womelsdorf	Pennsylvania	10/27/2011
144	[redacted]	Branchburg	New Jersey	10/27/2011
144	[redacted]	Belgrade	Montana	10/27/2011
144	[redacted]	Lakewood	Colorado	10/28/2011
144	[redacted]	Miami	Florida	10/28/2011
144	[redacted]	Stafford Springs	Connecticut	10/28/2011
1445	[redacted]	Charleston	South Carolina	10/28/2011
1446	[redacted]	Arcadia	California	10/28/2011
1447	[redacted]	East Brunswick	New Jersey	10/29/2011
1448	[redacted]	Clearwater	Florida	10/29/2011
1449	[redacted]	Aberdeen	Washington	10/29/2011
1450	[redacted]	Athens	New York	10/29/2011
1451	[redacted]	alleur		10/29/2011
1452	[redacted]	Bronx	New York	10/29/2011
1453	[redacted]	fort bragg	California	10/29/2011
1454	[redacted]	Long Island City	New York	10/29/2011
1455	[redacted]	Victoria		10/29/2011
1456	[redacted]	Colorado Springs	Colorado	10/29/2011
1457	[redacted]	La Selva Beach	California	10/29/2011
1458	[redacted]	Crystal Lake	Illinois	10/30/2011
1459	[redacted]	hay el hamadia		10/30/2011
1460	[redacted]	Manhattan	New York	10/30/2011
1461	[redacted]	Toronto		10/30/2011
1462	[redacted]	Tucker	Georgia	10/30/2011
1463	[redacted]	Baltimore	Maryland	10/31/2011
1464	[redacted]	Kimberly	Alabama	11/1/2011
1465	[redacted]	renkum		11/1/2011
1466	[redacted]	Clawson	Michigan	11/1/2011
1467	[redacted]	Munster	Indiana	11/2/2011
1468	[redacted]	Victoria	Illinois	11/2/2011
1469	[redacted]	antioch	California	11/2/2011
1470	[redacted]	Ringoes	New Jersey	11/2/2011
1471	[redacted]	Woodstock	Georgia	11/3/2011
1472	[redacted]	Focsani		11/4/2011
1473	[redacted]	Focsani		11/4/2011
1474	[redacted]	focsani		11/4/2011
1475	[redacted]	Bronx	New York	11/4/2011
1476	[redacted]	Loudonville	New York	11/4/2011
1477	[redacted]	Brasov		11/4/2011
1478	[redacted]	Louisville	Kentucky	11/4/2011
1479	[redacted]	Fayetteville	North Carolina	11/5/2011
1480	[redacted]	Santa Ana	California	11/5/2011
1481	[redacted]	Merrimack	New Hampshire	11/5/2011
1482	[redacted]	Seattle	Washington	11/5/2011
1483	[redacted]	Omaha	Nebraska	11/5/2011

	Name	City	State	Date
1484	[redacted]	Tucson	Arizona	11/5/2011
1485	[redacted]	Memphis	Tennessee	11/5/2011
1486	[redacted]	Buffalo	New York	11/5/2011
1487	[redacted]	Boston	Massachusetts	11/5/2011
1488	[redacted]	Kansas City	Missouri	11/5/2011
1489	[redacted]	Peking	Idaho	11/5/2011
1490	[redacted]	Memphis	Tennessee	11/5/2011
1491	[redacted]	Parker	Colorado	11/5/2011
1492	[redacted]	Montgomery	Alabama	11/5/2011
1493	[redacted]	Valparaiso	Indiana	11/6/2011
1494	[redacted]	Boulder	Colorado	11/6/2011
1495	[redacted]	staten island	New York	11/7/2011
1496	[redacted]	Cedar Hill	Texas	11/7/2011
1497	[redacted]	Orlando	Florida	11/7/2011
1498	[redacted]	Lake Wales	Florida	11/8/2011
1499	[redacted]	New York	New York	11/8/2011
1500	[redacted]	Rochester	New York	11/8/2011
1501	[redacted]	england		11/8/2011
1502	[redacted]	Mississauga		11/8/2011
1503	[redacted]	Saltspring Island		11/9/2011
1504	[redacted]	Dunedin		11/10/2011
1505	[redacted]	Stratford	California	11/10/2011
1506	[redacted]	avondale	Arizona	11/10/2011
1507	[redacted]	carlsbad	California	11/10/2011
1508	[redacted]	towanda	Illinois	11/10/2011
1509	[redacted]	germantown	Maryland	11/10/2011
1510	[redacted]	Sheboygan	Wisconsin	11/10/2011
1511	[redacted]	Old Bridge	New Jersey	11/11/2011
1512	[redacted]	Carmichael	California	11/11/2011
1513	[redacted]	Denver	Iowa	11/11/2011
1514	[redacted]	Kimberly	Wisconsin	11/12/2011
1515	[redacted]	warren	New Jersey	11/12/2011
1516	[redacted]	Manchester		11/13/2011
1517	[redacted]	colorado springs	Colorado	11/13/2011
1518	[redacted]	erdmannh.		11/13/2011
1519	[redacted]	macungie		11/13/2011
1520	[redacted]	Firgas		11/14/2011
1521	[redacted]	fort lauderdale	Florida	11/14/2011
1522	[redacted]	kronach		11/14/2011
1523	[redacted]	Sherman Oaks	California	11/14/2011
1524	[redacted]	Brisbane		11/14/2011
1525	[redacted]	Key LArgo	Florida	11/15/2011
1526	[redacted]	belleville	Michigan	11/15/2011
1527	[redacted]	Fort Myers	Florida	11/15/2011
1528	[redacted]	Portage	Michigan	11/15/2011

	Name	City	State	Date
1529	[redacted]	Walnut Creek	California	11/15/2011
1530	[redacted]	Anchorage	Alaska	11/16/2011
1531	[redacted]	Evans	Georgia	11/16/2011
1532	[redacted]	Beverly Hills	California	11/16/2011
1533	[redacted]	Wisconsin Rapids	Wisconsin	11/16/2011
1534	[redacted]	Oxford	Mississippi	11/17/2011
1535	[redacted]	Boston	Massachusetts	11/17/2011
1536	[redacted]	Alvarado	Texas	11/17/2011
1537	[redacted]	Mantorville	Minnesota	11/18/2011
1538	[redacted]	Providence	Rhode Island	11/18/2011
1539	[redacted]	Huntington	West Virginia	11/19/2011
1540	[redacted]	West New York		11/19/2011
1541	[redacted]	Washington	District Of Columbia	11/19/2011
1542	[redacted]	El Paso	Texas	11/21/2011
1543	[redacted]	WESTMINSTER	Colorado	11/21/2011
1544	[redacted]	Berkley	California	11/21/2011
1545	[redacted]	Cambridge	Massachusetts	11/21/2011
1546	[redacted]	Baton Rouge	Louisiana	11/21/2011
1547	[redacted]	Phoenix	Arizona	11/21/2011
1548	[redacted]	Emory	Texas	11/21/2011
1549	[redacted]	Milwaukee	Wisconsin	11/22/2011
1550	[redacted]	Miami	Florida	11/22/2011
1551	[redacted]	Colorado Springs	Colorado	11/22/2011
1552	[redacted]	Valparaiso	Indiana	11/22/2011
1553	[redacted]	MARION	Indiana	11/22/2011
1554	[redacted]	Mareeba		11/22/2011
1555	[redacted]	San Francisco	California	11/22/2011
1556	[redacted]	Cleveland	Ohio	11/22/2011
1557	[redacted]	Allentown	Pennsylvania	11/22/2011
1558	[redacted]	Clearwater	Florida	11/22/2011
1559	[redacted]	South Gate	California	11/22/2011
1560	[redacted]	Philadelphia	Pennsylvania	11/22/2011
1561	[redacted]	Lexington	South Carolina	11/22/2011
1562	[redacted]	Bronx	New York	11/22/2011
1563	[redacted]	St. Paul	Minnesota	11/22/2011
1564	[redacted]	Marshville	North Carolina	11/22/2011
1565	[redacted]	Madison	Alabama	11/22/2011
1566	[redacted]	Louisville	Kentucky	11/22/2011
1567	[redacted]	Albuquerque	New Mexico	11/22/2011
1568	[redacted]	CHADDS FORD	Pennsylvania	11/22/2011
1569	[redacted]	Omaha	Nebraska	11/22/2011
1570	[redacted]	Roanoke	Virginia	11/22/2011
1571	[redacted]	portland	Oregon	11/22/2011
1572	[redacted]	Miami	Florida	11/22/2011
1573	[redacted]	Portland	Oregon	11/23/2011

	Name	City	State	Date
157	[redacted]	chino hills	California	11/23/2011
157	[redacted]	Rockiin	California	11/23/2011
157	[redacted]	Wallingford		11/23/2011
157	[redacted]	edison	New Jersey	11/23/2011
157	[redacted]	Washington	District Of Columbia	11/23/2011
157	[redacted]	East Brunswick	New Jersey	11/23/2011
158	[redacted]	East Brunswick	New Jersey	11/23/2011
158	[redacted]	Manville	New Jersey	11/23/2011
158	[redacted]	new brunswick	New Jersey	11/23/2011
158	[redacted]	east brunswick	New Jersey	11/23/2011
158	[redacted]	east brunswick	New Jersey	11/23/2011
158	[redacted]	neptune	New Jersey	11/23/2011
158	[redacted]	Langley,BC		11/24/2011
158	[redacted]	santa Monica	California	11/24/2011
158	[redacted]	Oakdale	Minnesota	11/24/2011
158	[redacted]	Palm Coast	Florida	11/24/2011
159	[redacted]	Statesboro	Georgia	11/24/2011
159	[redacted]	Bern		11/24/2011
159	[redacted]	marlborough	Massachusetts	11/24/2011
159	[redacted]	palm bay	Florida	11/25/2011
159	[redacted]	Irvine	California	11/25/2011
159	[redacted]	Norwich	New York	11/26/2011
159	[redacted]	Edison	New Jersey	11/26/2011
159	[redacted]	Arcata	California	11/26/2011
159	[redacted]	Newport News	Virginia	11/26/2011
159	[redacted]	Seattle	Washington	11/26/2011
160	[redacted]	Ulm	Delaware	11/27/2011
160	[redacted]	S.C.S.	Michigan	11/27/2011
160	[redacted]	phoenix	Arizona	11/27/2011
160	[redacted]	Aguadilla		11/27/2011
160	[redacted]	Gtr Manchester		11/27/2011
160	[redacted]	Santa Barbara	California	11/27/2011
160	[redacted]	Newman	California	11/27/2011
160	[redacted]	Longmont	Colorado	11/28/2011
160	[redacted]	Rehoboth	Massachusetts	11/29/2011
160	[redacted]	Mamou	Louisiana	11/30/2011
161	[redacted]	FREDERICK	Maryland	11/30/2011
161	[redacted]	Fort Hood	Texas	11/30/2011
1612	[redacted]	Bronxville	New York	12/1/2011
1613	[redacted]	stonington	Connecticut	12/1/2011
1614	[redacted]	nashua	New Hampshire	12/1/2011
1615	[redacted]	San Diego	California	12/2/2011
1616	[redacted]	Jersey City	New Jersey	12/2/2011
1617	[redacted]	Orlando	Florida	12/2/2011
1618	[redacted]	Tinley Park	Illinois	12/2/2011

	Name	City	State	Date
161	[redacted]	Antioch	California	12/3/2011
162	[redacted]	Cottonwood	Arizona	12/4/2011
162	[redacted]	NY	New York	12/4/2011
162	[redacted]	Boston	Massachusetts	12/4/2011
162	[redacted]	Los Angeles	California	12/5/2011
162	[redacted]	Bellevue	Washington	12/5/2011
1625	[redacted]	Istanbul		12/5/2011
1626	[redacted]	Hastings	Nebraska	12/5/2011
1627	[redacted]	Wilmington	North Carolina	12/5/2011
1628	[redacted]	huntington beach	California	12/6/2011
1629	[redacted]	Carmel	Indiana	12/6/2011
1630	[redacted]	Charlotte	North Carolina	12/6/2011
1631	[redacted]	Valley Center	California	12/6/2011
1632	[redacted]	Sydney		12/6/2011
1633	[redacted]	Indianapolis	Indiana	12/6/2011
1634	[redacted]	Melbourne		12/6/2011
1635	[redacted]	Kissimmee	Florida	12/6/2011
1636	[redacted]	BRIDGEWATER	New Jersey	12/7/2011
1637	[redacted]	Bound Brook	New Jersey	12/7/2011
1638	[redacted]	San Diego	California	12/7/2011
1639	[redacted]	glen Rock	New Jersey	12/7/2011
1640	[redacted]	Piscataway	New Jersey	12/7/2011
1641	[redacted]	Fanwood	New Jersey	12/7/2011
1642	[redacted]	Kent	Washington	12/7/2011
1643	[redacted]	Portland	Oregon	12/7/2011
1644	[redacted]	Raritan	New Jersey	12/7/2011
1645	[redacted]	westport	Washington	12/7/2011
1646	[redacted]	Seymour	Tennessee	12/7/2011
1647	[redacted]	Tulsa	Oklahoma	12/8/2011
1648	[redacted]	Manchester	Massachusetts	12/8/2011
1649	[redacted]	huntington beach	California	12/8/2011
1650	[redacted]	Little egg harbor	New Jersey	12/8/2011
1651	[redacted]	dahlonega	Georgia	12/8/2011
1652	[redacted]	Hannibal	New York	12/8/2011
1653	[redacted]	Lafayette	Colorado	12/8/2011
1654	[redacted]	indianapolis	Indiana	12/8/2011
1655	[redacted]	Emerson	Georgia	12/9/2011
1656	[redacted]	Evansville	Indiana	12/9/2011
1657	[redacted]	Seekonk	Massachusetts	12/9/2011
1658	[redacted]	Greenfield	Massachusetts	12/10/2011
1659	[redacted]	Hong Kong		12/10/2011
1660	[redacted]	maynard	Massachusetts	12/10/2011
1661	[redacted]	Lakewood	Ohio	12/11/2011
1662	[redacted]	arcadia	California	12/11/2011
1663	[redacted]	green river	Wyoming	12/11/2011

	Name	City	State	Date
1664	[redacted]	rancho cucamonga	California	12/11/2011
1665	[redacted]	Ferndale	Michigan	12/12/2011
1666	[redacted]	Murray	Utah	12/12/2011
1667	[redacted]	Manhattan, New York Cit	New York	12/12/2011
1668	[redacted]	cherry hill	New Jersey	12/13/2011
1669	[redacted]	Van Nuys	California	12/13/2011
1670	[redacted]	Honolulu	Hawaii	12/13/2011
1671	[redacted]	St Catharines		12/14/2011
1672	[redacted]	Long Beach	California	12/14/2011
1673	[redacted]	Ormond Beach	Florida	12/14/2011
1674	[redacted]	bellevue	Nebraska	12/14/2011
1675	[redacted]	Doral	Florida	12/14/2011
1676	[redacted]	Brooklyn	New York	12/14/2011
1677	[redacted]	East Brunswick	New Jersey	12/14/2011
1678	[redacted]	point pleasant	New Jersey	12/14/2011
1679	[redacted]	houston	Texas	12/14/2011
1680	[redacted]	houston	Texas	12/14/2011
1681	[redacted]	seven hills	Ohio	12/15/2011
1682	[redacted]	Chicago	Illinois	12/15/2011
1683	[redacted]	south amboy	New Jersey	12/15/2011
1684	[redacted]	Lexington	Kentucky	12/15/2011
1685	[redacted]	Andover	New Jersey	12/15/2011
1686	[redacted]	louisville	Kentucky	12/15/2011
1687	[redacted]	Arlington	Texas	12/15/2011
1688	[redacted]	Virginia Beach	Virginia	12/16/2011
1689	[redacted]	Pottstown	Pennsylvania	12/16/2011
1690	[redacted]	DeKalb	Illinois	12/17/2011
1691	[redacted]	Coimbra	Alabama	12/18/2011
1692	[redacted]	Honolulu	Hawaii	12/18/2011
1693	[redacted]	Blaenau Ffestiniog		12/18/2011
1694	[redacted]	Glen Gardner	New Jersey	12/18/2011
1695	[redacted]	Phoenix	Arizona	12/18/2011
1696	[redacted]	Boston	Massachusetts	12/18/2011
1697	[redacted]	Clarks Summit	Pennsylvania	12/19/2011
1698	[redacted]	Rochester	Minnesota	12/19/2011
1699	[redacted]	Bexley	Ohio	12/19/2011
1700	[redacted]	Clarkston	Washington	12/20/2011
1701	[redacted]	Kittredge	Colorado	12/20/2011
1702	[redacted]	Salzgitter		12/20/2011
1703	[redacted]	Lansing	Michigan	12/20/2011
1704	[redacted]	Firebaugh	California	12/20/2011
1705	[redacted]	sf	California	12/21/2011
1706	[redacted]	Highland Park	New Jersey	12/22/2011
1707	[redacted]	Somerset		12/22/2011
1708	[redacted]	glendale	California	12/22/2011

	Name	City	State	Date
1709	[redacted]	Eureka	California	12/22/2011
1710	[redacted]	Manchester	New Hampshire	12/22/2011
1711	[redacted]	Beloit	Wisconsin	12/22/2011
1712	[redacted]	Bristol	Virginia	12/22/2011
1713	[redacted]	The Plains	Ohio	12/22/2011
1714	[redacted]	Cobb Island	Maryland	12/22/2011
1715	[redacted]	Kennedyville	Maryland	12/22/2011
1716	[redacted]	Boston	Massachusetts	12/22/2011
1717	[redacted]	El Paso	Texas	12/23/2011
1718	[redacted]	Sunset Beach	California	12/23/2011
1719	[redacted]	New York	New York	12/23/2011
1720	[redacted]	Falls Church	Virginia	12/24/2011
1721	[redacted]	Wylie	Texas	12/24/2011
1722	[redacted]	Cesky Krumlov	Armed Forces Pacific	12/24/2011
1723	[redacted]	Arvada	Colorado	12/24/2011
1724	[redacted]	Edmond	Oklahoma	12/24/2011
1725	[redacted]	Lakeland	Florida	12/24/2011
1726	[redacted]	buenos aires	Arkansas	12/25/2011
1727	[redacted]	Roslyn Heights	New York	12/25/2011
1728	[redacted]	Los Angeles	California	12/27/2011
1729	[redacted]	Glasshouse Mountains		12/27/2011
1730	[redacted]	Granby	Massachusetts	12/27/2011
1731	[redacted]	Calgary	California	12/27/2011
1732	[redacted]	Tempe	Arizona	12/27/2011
1733	[redacted]	Chesterfield	Indiana	12/27/2011
1734	[redacted]	Rockford	Illinois	12/28/2011
1735	[redacted]	atlanta	Georgia	12/28/2011
1736	[redacted]	Brooklyn	New York	12/29/2011
1737	[redacted]	Melbourne		12/29/2011
1738	[redacted]	Denton	Maryland	12/29/2011
1739	[redacted]	OFalon	Illinois	12/29/2011
1740	[redacted]	Philadelphia	Pennsylvania	12/30/2011
1741	[redacted]	Lahaina	Hawaii	12/31/2011
1742	[redacted]	--	New York	12/31/2011
1743	[redacted]	Buffalo Grove	Illinois	12/31/2011
1744	[redacted]	Charleston	South Carolina	12/31/2011
1745	[redacted]	Hamburg	Delaware	12/31/2011
1746	[redacted]	London		12/31/2011
1747	[redacted]	us	California	1/1/2012
1748	[redacted]	Las Vegas	Nevada	1/1/2012
1749	[redacted]	Las Vegas	Nevada	1/1/2012
1750	[redacted]	Nottingham		1/1/2012
1751	[redacted]	Coquitlam, Canada	Alabama	1/2/2012
1752	[redacted]	New Paltz	New York	1/3/2012
1753	[redacted]	Salt Lake City	Utah	1/3/2012

	Name	City	State	Date
1754	[redacted]	Austin	Texas	1/4/2012
1755	[redacted]	SHERWOOD	Oregon	1/5/2012
1756	[redacted]	Prague	Oklahoma	1/6/2012
1757	[redacted]	Geneva	Illinois	1/6/2012
1758	[redacted]	Virginia Beach		1/6/2012
1759	[redacted]	Kokomo	Indiana	1/6/2012
1760	[redacted]	Port St. Lucie	Florida	1/6/2012
1761	[redacted]	brownstown	Michigan	1/6/2012
1762	[redacted]	Pasay		1/7/2012
1763	[redacted]	Port Hueneme	California	1/7/2012
1764	[redacted]	El Paso	Texas	1/7/2012
1765	[redacted]	Miami	Florida	1/7/2012
1766	[redacted]	Saginaw	Michigan	1/7/2012
1767	[redacted]	Erdmannh.		1/7/2012
1768	[redacted]	Klamath falls	Oregon	1/7/2012
1769	[redacted]	Medford	Oregon	1/7/2012
1770	[redacted]	Akureyri		1/8/2012
1771	[redacted]	Calhoun	Georgia	1/8/2012
1772	[redacted]	white haven	Pennsylvania	1/8/2012
1773	[redacted]	Newark	New Jersey	1/8/2012
1774	[redacted]	Harbor Springs	Michigan	1/8/2012
1775	[redacted]	84106	Utah	1/8/2012
1776	[redacted]	Clinton	Mississippi	1/9/2012
1777	[redacted]	Arvin	California	1/9/2012
1778	[redacted]	Bullhead City	Arizona	1/9/2012
1779	[redacted]	Buzet		1/9/2012
1780	[redacted]	Las Vegas	New Mexico	1/9/2012
1781	[redacted]	Massillon	Ohio	1/10/2012
1782	[redacted]	Raleigh	North Carolina	1/10/2012
1783	[redacted]	Wausau	Wisconsin	1/11/2012
1784	[redacted]	Orchard Park	New York	1/11/2012
1785	[redacted]	Pittsford	New York	1/11/2012
1786	[redacted]	Tallahassee	Florida	1/12/2012
1787	[redacted]	Austin	Texas	1/13/2012
1788	[redacted]	Lake Orion	Michigan	1/13/2012
1789	[redacted]	Olympia	Washington	1/13/2012
1790	[redacted]	Gelsenkirchen	Alabama	1/13/2012
1791	[redacted]	Tallahassee	Florida	1/13/2012
1792	[redacted]	GLASGOW	California	1/14/2012
1793	[redacted]	Burton	Michigan	1/15/2012
1794	[redacted]	lake forest park	Washington	1/15/2012
1795	[redacted]	Glide	Oregon	1/15/2012
1796	[redacted]	Rancho Cucamonga	California	1/16/2012
1797	[redacted]	Augusta	Georgia	1/16/2012
1798	[redacted]	Cinnaminson	New Jersey	1/17/2012

	Name	City	State	Date
1799	[redacted]	Mestre - VE		1/17/2012
1800	[redacted]	Monmouth Junction	New Jersey	1/17/2012
1801	[redacted]	Winona	Minnesota	1/18/2012
1802	[redacted]	Everet	Washington	1/18/2012
1803	[redacted]	Coatesville	Pennsylvania	1/18/2012
1804	[redacted]	Brick	New Jersey	1/18/2012
1805	[redacted]	TAMPA	Florida	1/19/2012
1806	[redacted]	Riverside	New Jersey	1/19/2012
1807	[redacted]	Aqtau		1/20/2012
1808	[redacted]	Brooklyn	New York	1/20/2012
1809	[redacted]	cherry hill	New Jersey	1/21/2012
1810	[redacted]	Fishers	Indiana	1/22/2012
1811	[redacted]	Fitchburg	Wisconsin	1/22/2012
1812	[redacted]	Whitewater	Wisconsin	1/22/2012
1813	[redacted]	Melbourne	Virgin Islands	1/23/2012
1814	[redacted]	Crownsville	Maryland	1/24/2012
1815	[redacted]	Red Bank	New Jersey	1/25/2012
1816	[redacted]	Cranbury	New Jersey	1/25/2012
1817	[redacted]	Fredericksburg	Virginia	1/26/2012
1818	[redacted]	Lindenhurst	New York	1/27/2012
1819	[redacted]	CEDAR RAPIDS	Iowa	1/28/2012
1820	[redacted]	Oakland	California	1/28/2012
1821	[redacted]	Pittsburg	Kansas	1/28/2012
1822	[redacted]	Santa Rosa	California	1/29/2012
1823	[redacted]	Cottage Grove	Minnesota	1/29/2012
1824	[redacted]	Wheaton	Illinois	1/30/2012
1825	[redacted]	Los Angeles	California	1/30/2012
1826	[redacted]	hamburg		1/30/2012
1827	[redacted]	Keller	Texas	1/31/2012
1828	[redacted]	miami	Florida	1/31/2012
1829	[redacted]	Indianapolis	Indiana	1/31/2012
1830	[redacted]	Naperville	Illinois	1/31/2012
1831	[redacted]	Kokomo	Indiana	1/31/2012
1832	[redacted]	Cheboygan	Michigan	1/31/2012
1833	[redacted]	Madeira Beach	Florida	2/1/2012
1834	[redacted]	Clinton	New Jersey	2/1/2012
1835	[redacted]	N/A	Virginia	2/1/2012
1836	[redacted]	South Bound Brook	New Jersey	2/1/2012
1837	[redacted]	Jacksonville	Florida	2/1/2012
1838	[redacted]	Lindsborg	Kansas	2/2/2012
1839	[redacted]	New Brunswick	New Jersey	2/2/2012
1840	[redacted]	goshen	Indiana	2/3/2012
1841	[redacted]	Orono	Maine	2/3/2012
1842	[redacted]	beauparc,navan		2/3/2012
1843	[redacted]	Glenmont	New York	2/3/2012

	Name	City	State	Date
1844	[redacted]	Bolingbrook	Illinois	2/4/2012
1845	[redacted]	Wyoming	Michigan	2/4/2012
1846	[redacted]	Monroeville	Ohio	2/4/2012
1847	[redacted]	St.Leon-Rot	Delaware	2/4/2012
1848	[redacted]	Wuustwezel		2/4/2012
1849	[redacted]	Anderson	Indiana	2/4/2012
1850	[redacted]	matawan	New Jersey	2/5/2012
1851	[redacted]	East Setauket	New York	2/5/2012
1852	[redacted]	Prescott	Arizona	2/5/2012
1853	[redacted]	Port Richey	Florida	2/5/2012
1854	[redacted]	West Harrison	New York	2/5/2012
1855	[redacted]	Houston	Texas	2/6/2012
1856	[redacted]	Medford	Oregon	2/6/2012
1857	[redacted]	North Bend	Washington	2/6/2012
1858	[redacted]	Middletown	Delaware	2/7/2012
1859	[redacted]	ithaca	New York	2/7/2012
1860	[redacted]	San Jose	California	2/7/2012
1861	[redacted]	jackson	Mississippi	2/7/2012
1862	[redacted]	san diego	California	2/8/2012
1863	[redacted]	Arvada	Colorado	2/8/2012
1864	[redacted]	Lanham	Maryland	2/8/2012
1865	[redacted]	Verona	New Jersey	2/8/2012
1866	[redacted]	Gainesville	Florida	2/8/2012
1867	[redacted]	Tucson	Arizona	2/9/2012
1868	[redacted]	Santa Clarita	California	2/9/2012
1869	[redacted]	Sarasota	Florida	2/9/2012
1870	[redacted]	Willits	California	2/9/2012
1871	[redacted]	Orlando	Florida	2/9/2012
1872	[redacted]	Beaverton	Oregon	2/9/2012
1873	[redacted]	St Louis	Missouri	2/10/2012
1874	[redacted]	Dothan	Alabama	2/10/2012
1875	[redacted]	Brunswick	New York	2/10/2012
1876	[redacted]	Marco Island	Florida	2/12/2012
1877	[redacted]	New York	New York	2/12/2012
1878	[redacted]	KISSIMMEE	Florida	2/12/2012
1879	[redacted]	Denver	Colorado	2/12/2012
1880	[redacted]	Granton	Wisconsin	2/12/2012
1881	[redacted]	Santa Fe	New Mexico	2/12/2012
1882	[redacted]	Eagle	Colorado	2/12/2012
1883	[redacted]	wildomar	California	2/12/2012
1884	[redacted]	Monson	Massachusetts	2/12/2012
1885	[redacted]	navan		2/12/2012
1886	[redacted]	HOLLYWOOD	Florida	2/12/2012
1887	[redacted]	Navan		2/12/2012
1888	[redacted]	Calgary		2/12/2012

	Name	City	State	Date
188	[redacted]	Sutton	Alaska	2/12/2012
189	[redacted]	LeÃ³n		2/12/2012
189	[redacted]	Bariloche	Alabama	2/13/2012
189	[redacted]	Denver	Colorado	2/13/2012
189	[redacted]	Brookline	Massachusetts	2/13/2012
189	[redacted]	Blairsville	Pennsylvania	2/13/2012
189	[redacted]	San Diego	California	2/13/2012
189	[redacted]	Edison	New Jersey	2/13/2012
189	[redacted]	Edison	New Jersey	2/13/2012
189	[redacted]	Seattle	Washington	2/13/2012
189	[redacted]	Tucson	Arizona	2/14/2012
190	[redacted]	Pinole	California	2/14/2012
190	[redacted]	Austin	Texas	2/14/2012
190	[redacted]	Richmond	California	2/14/2012
190	[redacted]	Grand Forks	North Dakota	2/14/2012
190	[redacted]	Dry Prong	Louisiana	2/14/2012
190	[redacted]	norman	Oklahoma	2/14/2012
190	[redacted]	Moscow	Idaho	2/14/2012
190	[redacted]	michigan	New York	2/14/2012
190	[redacted]	Jacksonville	Florida	2/14/2012
190	[redacted]	New York	New York	2/14/2012
191	[redacted]	Carnago		2/14/2012
1911	[redacted]	Newark	Delaware	2/14/2012
1912	[redacted]	Hesperia	California	2/14/2012
1913	[redacted]	Cookeville	Tennessee	2/14/2012
1914	[redacted]	Orange	California	2/14/2012
1915	[redacted]	Randburg		2/14/2012
1916	[redacted]	High Point	North Carolina	2/14/2012
1917	[redacted]	Colonia	New Jersey	2/14/2012
1918	[redacted]	Bochnia		2/14/2012
1919	[redacted]	La Crescenta	California	2/15/2012
1920	[redacted]	Monmouth Junction	New Jersey	2/15/2012
1921	[redacted]	Jersey City	New Jersey	2/15/2012
1922	[redacted]	Emporium	Pennsylvania	2/15/2012
1923	[redacted]	Phoenix	Arizona	2/15/2012
1924	[redacted]	Lincoln	Alabama	2/15/2012
1925	[redacted]	ithaca	New York	2/15/2012
1926	[redacted]	Eden Prairie	Minnesota	2/15/2012
1927	[redacted]	South Portland	Maine	2/15/2012
1928	[redacted]	Nyack	New York	2/16/2012
1929	[redacted]	savannah	Georgia	2/16/2012
1930	[redacted]	Zagreb		2/16/2012
1931	[redacted]	Paso Robles	California	2/16/2012
1932	[redacted]	Dover	Delaware	2/17/2012
1933	[redacted]	victoria	Illinois	2/17/2012

	Name	City	State	Date
1934	[redacted]	Orangeburg	South Carolina	2/17/2012
1935	[redacted]	Redmond	Washington	2/17/2012
1936	[redacted]	Milwaukee	Wisconsin	2/17/2012
1937	[redacted]	Cambridge	Massachusetts	2/18/2012
1938	[redacted]	Banning	California	2/18/2012
1939	[redacted]	Monroeton	Pennsylvania	2/18/2012
1940	[redacted]	Austin	Texas	2/18/2012
1941	[redacted]	magnolia	Texas	2/18/2012
1942	[redacted]	haverhill	Massachusetts	2/18/2012
1943	[redacted]	Brooklyn	New York	2/19/2012
1944	[redacted]	Sherman Oaks	California	2/19/2012
1945	[redacted]	Farmington	New Mexico	2/19/2012
1946	[redacted]	brisbane		2/20/2012
1947	[redacted]	Baytown	Texas	2/20/2012
1948	[redacted]	Naalehu	Hawaii	2/20/2012
1949	[redacted]	Alderley		2/20/2012
1950	[redacted]	Highland Park	Illinois	2/20/2012
1951	[redacted]	Murfreesboro	Tennessee	2/20/2012
1952	[redacted]	New York	New York	2/21/2012
1953	[redacted]	brunswick		2/21/2012
1954	[redacted]	Bridgewater	New Jersey	2/21/2012
1955	[redacted]	Belfast		2/21/2012
1956	[redacted]	marietta	Pennsylvania	2/21/2012
1957	[redacted]	beverly	Massachusetts	2/21/2012
1958	[redacted]	Stephentown	New York	2/21/2012
1959	[redacted]	Middleburg	Virginia	2/21/2012
1960	[redacted]	Newburyport	Massachusetts	2/21/2012
1961	[redacted]	Charlottesville	Virginia	2/22/2012
1962	[redacted]	Cookstown	New Jersey	2/22/2012
1963	[redacted]	Eureka	Missouri	2/22/2012
1964	[redacted]	Newport News	Virginia	2/22/2012
1965	[redacted]	Polk	Florida	2/22/2012
1966	[redacted]	Jacksonville	Florida	2/22/2012
1967	[redacted]	Allegany	New York	2/23/2012
1968	[redacted]	INDIANAPOLIS	Indiana	2/23/2012
1969	[redacted]	Longview	Washington	2/23/2012
1970	[redacted]	guerneville	California	2/23/2012
1971	[redacted]	Laporte	Colorado	2/23/2012
1972	[redacted]	Heber Springs	Arkansas	2/23/2012
1973	[redacted]	Redding	Connecticut	2/23/2012
1974	[redacted]	Brick	New Jersey	2/23/2012
1975	[redacted]	Mendota Heights	Minnesota	2/23/2012
1976	[redacted]	Rockaway Park	New York	2/23/2012
1977	[redacted]	Cornwall Bridge	Connecticut	2/23/2012
1978	[redacted]	Livonia	Michigan	2/23/2012

	Name	City	State	Date
1979	[redacted]	Baltimore	Maryland	2/24/2012
1980		Brentwood	Maryland	2/24/2012
1981		Baldwin Park	California	2/24/2012
1982		Sydney		2/24/2012
1983		colo spgs	Colorado	2/24/2012
1984		Danbury	Connecticut	2/24/2012
1985		Huntington Beach	California	2/24/2012
1986		Lancaster	Pennsylvania	2/24/2012
1987		Barnegat	New Jersey	2/24/2012
1988		chicago	Illinois	2/24/2012
1989		WANTIRNA		2/24/2012
1990		north bergen	New Jersey	2/25/2012
1991		Kortrijk-Heule West-Vlaa	Nebraska	2/25/2012
1992		Puunene	Hawaii	2/25/2012
1993		Jacksonville	Florida	2/25/2012
1994		Chesapeake	Virginia	2/25/2012
1995		Cambridge	Massachusetts	2/25/2012
1996		Norwich		2/25/2012
1997		Royal Oak	Michigan	2/25/2012
1998		Tampa	Florida	2/26/2012
1999		Royersford	Pennsylvania	2/26/2012
2000		Shirley	New York	2/26/2012
2001		gaithersburg	Maryland	2/26/2012
2002		Grand Forks	North Dakota	2/26/2012
2003		van nuys	California	2/26/2012
2004		Oak Ridge	Tennessee	2/26/2012
2005		Skillman	New Jersey	2/26/2012
2006		Henniker	New Hampshire	2/27/2012
2007		Bartow	Florida	2/27/2012
2008		Manalapan	New Jersey	2/27/2012
2009		Brampton		2/27/2012
2010		rockford	Illinois	2/27/2012
2011		Kingston	Georgia	2/27/2012
2012		Hackettstown	New Jersey	2/27/2012
2013		Santa Clarita	California	2/27/2012
2014		vienna	New Jersey	2/27/2012
2015		Staten Island	New York	2/27/2012
2016		Scottsdale	Arizona	2/27/2012
2017		Austin	Texas	2/27/2012
2018		Bayside	New York	2/28/2012
2019		Dublin	Ohio	2/28/2012
2020		Sacramento	California	2/28/2012
2021		Goodyear	Arizona	2/28/2012
2022		Leonardo	New Jersey	2/28/2012
2023		Cleveland	Tennessee	2/28/2012

	Name	City	State	Date
2024	[redacted]	bath	Alaska	2/28/2012
2025	[redacted]	johnson city	New York	2/28/2012
2026	[redacted]	Cinnaminson	New Jersey	2/28/2012
2027	[redacted]	New Westminster		2/28/2012
2028	[redacted]	West Vancouver		2/29/2012
2029	[redacted]	cinnaminson	New Jersey	2/29/2012
2030	[redacted]	Atascadero	California	2/29/2012
2031	[redacted]	Massapequa	New York	2/29/2012
2032	[redacted]	Dobbs Ferry	New York	2/29/2012
2033	[redacted]	Ossining	New York	2/29/2012
2034	[redacted]	Philadelphia	Pennsylvania	3/1/2012
2035	[redacted]	Severn	Maryland	3/1/2012
2036	[redacted]	South Bound Brook	New Jersey	3/1/2012
2037	[redacted]	Antioch	California	3/1/2012
2038	[redacted]	bound brook	New Jersey	3/2/2012
2039	[redacted]	huntersville	North Carolina	3/2/2012
2040	[redacted]	Fanwood	New Jersey	3/2/2012
2041	[redacted]	Hillsborough	New Jersey	3/2/2012
2042	[redacted]	battle creek	Michigan	3/2/2012
2043	[redacted]	san francisco	California	3/2/2012
2044	[redacted]	Arlington	Texas	3/2/2012
2045	[redacted]	Dallas	Texas	3/2/2012
2046	[redacted]	Santa Rosa	California	3/3/2012
2047	[redacted]	neuss		3/3/2012
2048	[redacted]	Phoenix	Arizona	3/3/2012
2049	[redacted]	Brooklyn	New York	3/3/2012
2050	[redacted]	perry	Georgia	3/3/2012
2051	[redacted]	Hamburg		3/3/2012
2052	[redacted]	Robbinsville	New Jersey	3/3/2012
2053	[redacted]	W.W.	Rhode Island	3/3/2012
2054	[redacted]	Des Moines	Iowa	3/3/2012
2055	[redacted]	Kernersville	North Carolina	3/3/2012
2056	[redacted]	Brick	New Jersey	3/3/2012
2057	[redacted]	Austin	Texas	3/4/2012
2058	[redacted]	south plainfield	New Jersey	3/4/2012
2059	[redacted]	West Hollywood	California	3/4/2012
2060	[redacted]	Bay Shore	New York	3/4/2012
2061	[redacted]	silver spring	Maryland	3/5/2012
2062	[redacted]	Watsonville	California	3/5/2012
2063	[redacted]	Red Bay	Alabama	3/5/2012
2064	[redacted]	Dalton	Georgia	3/5/2012
2065	[redacted]	BANGOR	Maine	3/5/2012
2066	[redacted]	Depew	New York	3/5/2012
2067	[redacted]	Tallahassee	Florida	3/6/2012
2068	[redacted]	Brampton		3/6/2012

	Name	City	State	Date
2069	[redacted]	El Cajon	California	3/6/2012
2070		Portsmouth	Virginia	3/6/2012
2071		bound brook	New Jersey	3/6/2012
2072		tybee island	Georgia	3/6/2012
2073		Pittstown	New Jersey	3/6/2012
2074		P		3/7/2012
2075		East Brunswick	New Jersey	3/7/2012
2076		Union	New Jersey	3/7/2012
2077		Conway	New Hampshire	3/7/2012
2078		clyde	North Carolina	3/8/2012
2079		Philadelphia	Pennsylvania	3/8/2012
2080		forsyth	Missouri	3/8/2012
2081		Sault Ste. Marie	Michigan	3/8/2012
2082		North Guwahati		3/8/2012

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To: The Governor of NJ, State Sen. Michael Doherty (NJ-023), State Sen. Christopher Bateman (NJ-016), State Sen. Barbara Buono (NJ-018), State Sen. Raymond Lesniak (NJ-020), State Sen. Stephen Sweeney (NJ-003), Sen. Frank Lautenberg (NJ), Sen. Robert Menendez (NJ), Rep. Rush Holt (NJ-12), Rep. Frank Pallone (NJ-06), Sen. Barbara Boxer (CA), State Sen. Bob Smith (NJ-017), Rep. Leonard Lance (NJ-07), Rep. Rodney Frelinghuysen (NJ-11), USEPA Remedial Project Manager (Joseph Battipaglia), USEPA Region 2 Administrator (Judith Enck), USEPA Administrator (Lisa Jackson), USEPA Region 2 Superfund Chief (Walter Mugdan), NJDEP Commissioner (Bob Martin), MSNBC (Rachel Maddow), Mayor of Bound Brook (Carey Pilato), Mayor of Bridgewater (Daniel J. Hayes, Jr), Mayor of Manville (Angelo Corradino), Pfizer (Wendy Lazarus), Pfizer (Russell Downey)

Subject: Re: American Cyanamid Proposed Plan Comment

Letter: Dear USEPA Regulators, Elected Officials, and Pfizer Representatives,

I respectfully request a 60-day extension for the American Cyanamid Superfund Site Proposed Plan public comment period due to the size and scope of this cleanup. The public must have additional time to review the relevant data for the Proposed Plan and Feasibility Study. The United States Environmental Protection Agency (USEPA) has released this Proposed Plan with very little time for review, and the Feasibility Study is full of inconsistencies.

In addition, I request that USEPA requires Pfizer to properly remediate the 80-year old leaking toxic dump, the American Cyanamid Superfund Site in Bridgewater, NJ. Please include my comments as part of the official public record. In order to protect human health and the environment, USEPA must require Pfizer to remediate the site using "Alternative 7," and not "Alternative 4A," as described in their 2012 Proposed Plan. Alternative 4A, while the least costly for Pfizer, is not protective of the public's health or the environment.

Why did USEPA allow the responsible party to stop the cleanup midstream after the record of decision was signed, and then let the site languish for another eight years? This current plan for capping a toxic waste floodplain is unacceptable and threatens the Raritan River Estuary and the millions of New Jersey residents who live near or downstream from the site. USEPA has mishandled this site from the beginning, and it's time to put the residents first. A scathing report by the USEPA Attorney General documents that USEPA and NJDEP did not ensure this Superfund site cleanup progressed at a timely pace, along with numerous other failures. The report can be found here: http://www.epa.gov/oig/reports/2008/20080602-08-P-0169.pdf.

The selected remedy, Alternative 4A, will not be protective of human health and the environment for the following reasons: Filling in a floodplain and capping the site is NOT a full remediation, and could vastly expand serious toxic flooding for thousands of neighboring families, which poses a serious health threat. Pfizer claims there will be no net filling. That is not true as the entire area, not just the fenced site, is in the floodplain. Also, the effect on solidifying parts of the site and capping a floodplain this large is not a permanent long-term solution. All caps fail, it's just a matter of time. This is not protective and it's not permanent. It is the cheapest for the multinational corporation who would rather pour their money into public relations and pretty brochures than be good corporate neighbors and clean up there toxic mess.

I am also highly concerned that Alternative 4A could drastically expand serious toxic flooding for thousands of neighboring families that are already plagued by heavy flood waters. The Proposed Plan Alternative 4A proposes to cover the contamination with a combination of soil and engineering caps. For the larger portions of the site, Pfizer proposes to raise the gradient two feet. As you are aware, this site lies in the floodplain and, as the most recent flood of Hurricane Irene shows, the American Cyanamid Site can hold about 300,000,000 gallons of water. Placing two feet of fill on the site will reduce its flood storage capacity and could exacerbate the regional flood issue in the area.

In addition, filling of a flood zone is subject to both New Jersey and Federal regulations. These regulations specify that there can be no net filling of the wetlands or a flood zone, which means you cannot fill one area of the site without removing fill from some other location so the status quo doesn't change. The Proposed Plan is completely silent of the impacts of filling, and this most critical aspect of the American Cyanamid site MUST be clearly presented. The implemented plan must assure it will not exacerbate flooding in the lower Raritan River. The U.S. Army Corps of Engineers is actively working on flood control projects in the Raritan River Watershed to help alleviate flooding in Manville, Bound Brook, Bridgewater and all surrounding towns. The American Cyanamid site is a natural fit for a regional flood control project and can be an environmental benefit for the region if the proper remedy is selected.

The Proposed Plan outlines more applicable cleanup alternatives than Alternative 4A suggests, including low temperature desorption (Alternative 7). This method was successfully used at the Cornell-Dubilier Superfund Site in South Plainfield, NJ to remediate soils with high levels of PCBs and heavy metals without disturbing the surrounding community. In addition, USEPA and Pfizer can make use of an active rail line that runs through the site to properly dispose of this material. The cost estimates for the alternatives seem very high and there must be a detailed analysis for the cost of a low temperature thermal desorption unit. USEPA needs to go back and reevaluate the options they are presenting here.

USEPA must look at low temperature thermal desorption in combination with other techniques, such as off-site disposal at their existing RCRA facility across the street, and other innovative technologies, such as bio remediation. The USEPA must choose the most protective remedy now and implement it.

This site cleanup has been languishing for over two decades, and it is time for USEPA to take serious action. In order to protect the health and safety of families that utilize this area for recreation, USEPA must require a proper cleanup as outlined in Alternative 7 in the Proposed Plan. Capping this site violates USEPA's preference for permanent, cost effective, and protective cleanups, as caps always fail. Other Alternatives offer more permanent solutions for this cleanup.

I support the plans put forth by the nationally recognized environmental expert, the nonprofit Edison Wetlands Association, and their scientists and engineers to bring in a low temperature thermal desorption unit. I want this and other treatment technologies used to clean up the American Cyanamid Site, including the existing off-site RCRA disposal facility specifically constructed to handle the waste from this site. Capping and/or solidifying the toxic waste on site should not be used under any circumstances in this floodplain.

Thank you for your timely assistance on this important environmental issue.

Respectfully,

SIGNATURES

	Name	City	State	Date
1	[redacted]	Martinez	California	3/6/2012
2	[redacted]	Rockwall	Texas	3/6/2012
3	[redacted]	Tallahassee	Florida	3/6/2012
4	[redacted]	Kingsville	Texas	3/6/2012
5	[redacted]	Brooklyn	New York	3/6/2012
6	[redacted]	NY	New York	3/6/2012
7	[redacted]	Antioch	Tennessee	3/6/2012
8	[redacted]	Thousand Oaks	California	3/6/2012
9	[redacted]	Kennett Square	Pennsylvania	3/6/2012
10	[redacted]	Scottsdale	Arizona	3/6/2012
11	[redacted]	Burlingame	California	3/6/2012
12	[redacted]	East Brunswick	New Jersey	3/6/2012
13	[redacted]	Denville	New Jersey	3/6/2012
14	[redacted]	Weehawken	New Jersey	3/6/2012
15	[redacted]	Plano	Texas	3/6/2012
16	[redacted]	Orono	Maine	3/6/2012
17	[redacted]	Edison	New Jersey	3/6/2012
18	[redacted]	Newport News	Virginia	3/6/2012
19	[redacted]	Fort Lee	New Jersey	3/6/2012
20	[redacted]	metuchen	New Jersey	3/6/2012
21	[redacted]	Brighton	Colorado	3/6/2012
22	[redacted]	El Paso	Texas	3/6/2012
23	[redacted]	Brampton		3/6/2012
24	[redacted]	El Cajon	California	3/6/2012
25	[redacted]	Stockbridge	Massachusetts	3/6/2012
26	[redacted]	Smyrna	Tennessee	3/6/2012
27	[redacted]	little rock	Arkansas	3/6/2012
28	[redacted]	Skelmersdale		3/6/2012
29	[redacted]	Rebecca	Georgia	3/6/2012
30	[redacted]	buffalo	New York	3/6/2012
31	[redacted]	Somerset	New Jersey	3/6/2012
32	[redacted]	Keansburg	New Jersey	3/6/2012
33	[redacted]	Austin	Texas	3/6/2012
34	[redacted]	Arlington	Virginia	3/6/2012
35	[redacted]	prairie village	Kansas	3/6/2012
36	[redacted]	Edison Twp	New Jersey	3/6/2012
37	[redacted]	Edison	New Jersey	3/6/2012
38	[redacted]	Burton	Michigan	3/6/2012
39	[redacted]	Lexington	North Carolina	3/6/2012
40	[redacted]	Roanoke	Virginia	3/6/2012
41	[redacted]	New City	New York	3/6/2012
42	[redacted]	Portsmouth	Virginia	3/6/2012
43	[redacted]	Bridgewater	New Jersey	3/6/2012
44	[redacted]	Millville	New Jersey	3/6/2012

	Name	City	State	Date
45	[redacted]	Portsmouth	Virginia	3/6/2012
46	[redacted]	New Paltz	New York	3/6/2012
47	[redacted]	Munhall	Pennsylvania	3/6/2012
48	[redacted]	Severn	Maryland	3/6/2012
49	[redacted]	Irving	Texas	3/6/2012
50	[redacted]	Howell	New Jersey	3/6/2012
51	[redacted]	Long Valley	New Jersey	3/6/2012
52	[redacted]	Bound Brook	New Jersey	3/6/2012
53	[redacted]	Minneapolis	Minnesota	3/6/2012
54	[redacted]	West Bend	Wisconsin	3/6/2012
55	[redacted]	new brunswick	New Jersey	3/6/2012
56	[redacted]	newmarket		3/6/2012
57	[redacted]	Tampa	Florida	3/6/2012
58	[redacted]	hanalei	Hawaii	3/6/2012
59	[redacted]	Medford	Oregon	3/6/2012
60	[redacted]	Bellingham	Washington	3/6/2012
61	[redacted]	LA	California	3/6/2012
62	[redacted]	Bay City	Michigan	3/6/2012
63	[redacted]	london	New York	3/6/2012
64	[redacted]	Bolton	Massachusetts	3/6/2012
65	[redacted]	Madison	Wisconsin	3/6/2012
66	[redacted]	fargo	North Dakota	3/6/2012
67	[redacted]	Richardson	Texas	3/6/2012
68	[redacted]	Ferndale	Michigan	3/6/2012
69	[redacted]	xxxx	New York	3/6/2012
70	[redacted]	Buffalo	New York	3/6/2012
71	[redacted]	New York	New York	3/6/2012
72	[redacted]	Metairie	Louisiana	3/6/2012
73	[redacted]	Maumee	Ohio	3/6/2012
74	[redacted]	carneys point	New Jersey	3/6/2012
75	[redacted]	Hampton	New Jersey	3/6/2012
76	[redacted]	Minneapolis	Minnesota	3/6/2012
77	[redacted]	Perth Amboy	New Jersey	3/6/2012
78	[redacted]	Richmond	Virginia	3/6/2012
79	[redacted]	las vegas	Nevada	3/6/2012
80	[redacted]	Mt. Vernon	Texas	3/6/2012
81	[redacted]	Ringoes	New Jersey	3/6/2012
82	[redacted]	Bentonville	Arkansas	3/6/2012
83	[redacted]	Flagler Beach	Florida	3/6/2012
84	[redacted]	Shelbyville	Indiana	3/6/2012
85	[redacted]	Hempstead	New York	3/6/2012
86	[redacted]	Saratoga		3/7/2012
87	[redacted]	Eugene	Oregon	3/7/2012
88	[redacted]	SANTA MONICA	California	3/7/2012
89	[redacted]	dover	New Hampshire	3/7/2012

	Name	City	State	Date
90	[redacted]	irving	Texas	3/7/2012
91	[redacted]	Williamsburg	Virginia	3/7/2012
92	[redacted]	Hollister	California	3/7/2012
93	[redacted]	Yonkers	New York	3/7/2012
94	[redacted]	Burbank	California	3/7/2012
95	[redacted]	San Diego	California	3/7/2012
96	[redacted]	Riverdale	New Jersey	3/7/2012
97	[redacted]	Victoria		3/7/2012
98	[redacted]	Summerfield	Florida	3/7/2012
99	[redacted]	Wanaque	New Jersey	3/7/2012
100	[redacted]	bay city	Michigan	3/7/2012
101	[redacted]	Portland	Oregon	3/7/2012
102	[redacted]	winchester	Massachusetts	3/7/2012
103	[redacted]	alta loma	California	3/7/2012
104	[redacted]	Atascadero	California	3/7/2012
105	[redacted]	East Northport	New York	3/7/2012
106	[redacted]	Waxahachie	Texas	3/7/2012
107	[redacted]	Aldershot		3/7/2012
108	[redacted]	Rochester	New York	3/7/2012
109	[redacted]	Quincy	Massachusetts	3/7/2012
110	[redacted]	Long Beach	California	3/7/2012
111	[redacted]	Chatham	New Jersey	3/7/2012
112	[redacted]	Lund		3/7/2012
113	[redacted]	San Francisco	California	3/7/2012
114	[redacted]	Duluth	Georgia	3/7/2012
115	[redacted]	Portland	Oregon	3/7/2012
116	[redacted]	Cocoa	Florida	3/7/2012
117	[redacted]	South Gate	California	3/7/2012
118	[redacted]	geelong		3/7/2012
119	[redacted]	Ã–sterÃ¥ker	Armed Forces Americas	3/7/2012
120	[redacted]	Arkhangelsk		3/7/2012
121	[redacted]	P		3/7/2012
122	[redacted]	Ojai	California	3/7/2012
123	[redacted]	Loxahatchee	Florida	3/7/2012
124	[redacted]	Toronto		3/7/2012
125	[redacted]	Newland	North Carolina	3/7/2012
126	[redacted]	Somerdale	New Jersey	3/7/2012
127	[redacted]	Montgomery	New York	3/7/2012
128	[redacted]	Los Lunas	New Mexico	3/7/2012
129	[redacted]	west hills	California	3/7/2012
130	[redacted]	West Columbia	South Carolina	3/7/2012
131	[redacted]	Bound Brook	New Jersey	3/7/2012
132	[redacted]	Athens	Ohio	3/7/2012
133	[redacted]	Asheville	North Carolina	3/7/2012
134	[redacted]	Beltsville	Maryland	3/7/2012

	Name	City	State	Date
135	[redacted]	Carmichael	California	3/7/2012
136	[redacted]	Bloomington	Indiana	3/7/2012
137	[redacted]	Kailua	Hawaii	3/7/2012
138	[redacted]	Rosemere	New Jersey	3/7/2012
139	[redacted]	athens	California	3/7/2012
140	[redacted]	Park City	Utah	3/7/2012
141	[redacted]	kalamazoo	Michigan	3/7/2012
142	[redacted]	Edison	New Jersey	3/7/2012
143	[redacted]	haskell	New Jersey	3/7/2012
144	[redacted]	New York	New York	3/7/2012
145	[redacted]	Wayne	New Jersey	3/7/2012
146	[redacted]	Cincinnati	Ohio	3/7/2012
147	[redacted]	LAS VEGAS	Nevada	3/7/2012
148	[redacted]	sf	California	3/7/2012
149	[redacted]	Phoenix	Arizona	3/7/2012
150	[redacted]	Pascoag	South Carolina	3/7/2012
151	[redacted]	arcadia	California	3/7/2012
152	[redacted]	north brunswick	New Jersey	3/7/2012
153	[redacted]	Miami	Florida	3/7/2012
154	[redacted]	Chicago	Illinois	3/7/2012
155	[redacted]	Richmond	Virginia	3/7/2012
156	[redacted]	Fairhaven	Massachusetts	3/7/2012
157	[redacted]	Los Angeles	California	3/7/2012
158	[redacted]	Tampere	Florida	3/7/2012
159	[redacted]	Metuchen	New Jersey	3/7/2012
160	[redacted]	Topeka	Kansas	3/8/2012
161	[redacted]	Madison	Wisconsin	3/8/2012
162	[redacted]	Hailey	Idaho	3/8/2012
163	[redacted]	Huntington Beach	California	3/8/2012
164	[redacted]	winston salem	North Carolina	3/8/2012
165	[redacted]	Fairfax	California	3/8/2012
166	[redacted]	clyde	North Carolina	3/8/2012
167	[redacted]	Raritan	New Jersey	3/8/2012
168	[redacted]	Balgonie		3/8/2012
169	[redacted]	Darby	Pennsylvania	3/8/2012
170	[redacted]	San Francisco	California	3/8/2012
171	[redacted]	Murrells Inlet	South Carolina	3/8/2012
172	[redacted]	Buenos Aires	Arkansas	3/8/2012
173	[redacted]	Somewhere	Nebraska	3/8/2012
174	[redacted]	Philadelphia	Pennsylvania	3/8/2012
175	[redacted]	Lubbock	Texas	3/8/2012
176	[redacted]	San Francisco	California	3/8/2012
177	[redacted]	Washington	New Jersey	3/8/2012
178	[redacted]	forsyth	Missouri	3/8/2012
179	[redacted]	Seattle	Washington	3/8/2012

	Name	City	State	Date
180	[redacted]	Tampa,	Florida	3/8/2012
181	[redacted]	Horsham	Pennsylvania	3/8/2012
182	[redacted]	Eagleville	Pennsylvania	3/8/2012
183	[redacted]	Dallas	Texas	3/8/2012
184	[redacted]	Portland	Oregon	3/8/2012
185	[redacted]	Monroe	Connecticut	3/8/2012
186	[redacted]	Phoenix	Arizona	3/8/2012
187	[redacted]	Key LArgo	Florida	3/8/2012
188	[redacted]	Jacksonville	Florida	3/8/2012
189	[redacted]	Austin	Texas	3/8/2012
190	[redacted]	High Point	North Carolina	3/8/2012
191	[redacted]	Laguna Hills	California	3/8/2012
192	[redacted]	Bridgewater	New Jersey	3/8/2012

EWA

U.S. EPA
Attn: Joseph Battipaglia
290 Broadway, 19th Floor
New York, New York 10007-1866

May 10, 2012

Re: American Cyanamid Proposed Plan Comment

Dear Mr. Battipaglia,

On behalf of Edison Wetlands Association and over 4,800 people who signed these petitions on Change.org, I would like the attached comment letters to be included as part of the official public record for the American Cyanamid Proposed Plan.

These letters request that the United States Environmental Protection Agency (USEPA) requires Pfizer to permanently remediate the 80-year old leaking toxic dump, the American Cyanamid Superfund Site in Bridgewater, NJ. In order to protect human health and the environment, USEPA must require Pfizer to remediate the site using a modified version of "Alternative 7," and not "Alternative 4A," as described in their 2012 Proposed Plan.

If you have any questions, you can contact me at 732-321-1300 or via email at rspiegel@edisonwetlands.org. Thank you for your timely assistance on this important environmental issue.

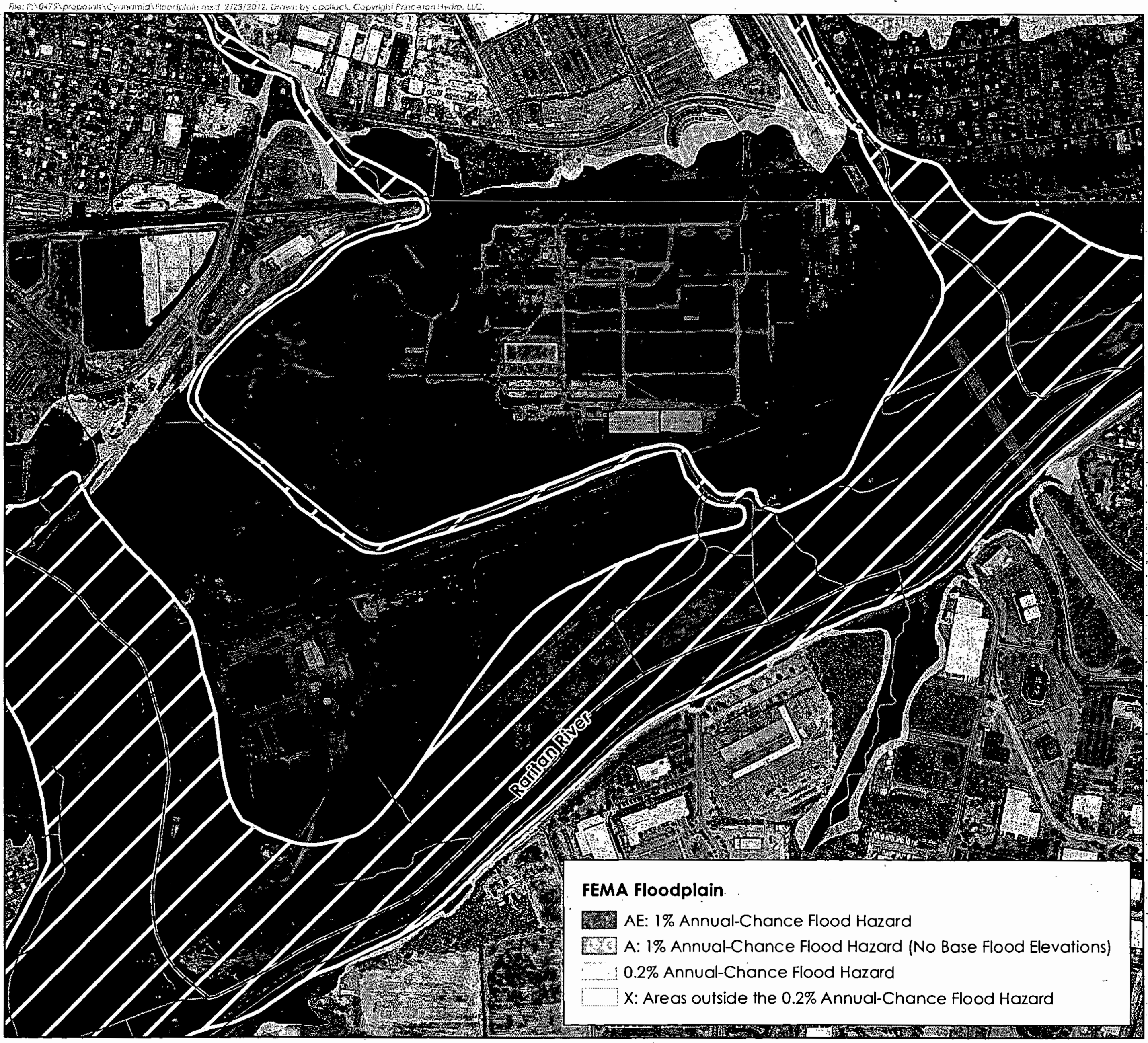
Sincerely,

Robert Spiegel

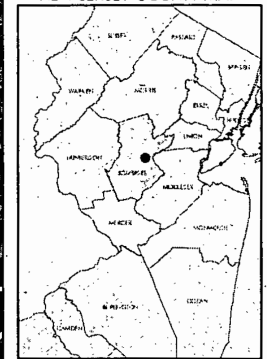
Robert Spiegel
Executive Director
Edison Wetlands Association

CC: U.S. Senator Frank Lautenberg (with separate cover)
U.S. Senator Robert Menendez (with separate cover)
U.S. Congressman Frank Pallone (with separate cover)
State Senator Barbara Buono (with separate cover)

File: P:\0475\proposals\Cyanamid\Floodplain.mxd 2/23/2012. Drawn by cpolluck. Copyright Princeton Hydro, LLC.



NEW JERSEY COUNTY MAP



PRINCETON HYDRO, LLC.
1108 OLD YORK ROAD
P.O. BOX 720
RINGOES, NJ 08551
*with offices in NJ, PA and CT

1 inch = 1,000 feet

0 500 1,000 Feet

NOTES:

1. FEMA 2007 DFIRM obtained from FEMA Map Resources Center.

Map Projection:
NAD 1983 StatePlane New Jersey FIPS 2900 Feet

FEMA FLOODPLAIN

AMERICAN CYANAMID SITE
BRIDGEWATER TOWNSHIP
SOMERSET COUNTY, NEW JERSEY
EDISON WETLANDS ASSOCIATION

Legend

Stream

FEMA Floodway

Municipal Boundary

R2-0007853

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
(See Issuing Division below)
PERMIT*

The New Jersey Department of Environmental Protection grants this permit in accordance with your application, attachments accompanying same application, and applicable laws and regulations. This permit is also subject to the further conditions and stipulations enumerated in the supporting documents which are agreed to by the permittee upon acceptance of the permit.

Permit No. 1806-02-0005.2 FHA 050001 1806-02-0005.2 FWW 050001 GP No. 4	Application No.

Issuance Date	Effective Date	Expiration Date
Name and Address of Applicant Wyeth Holdings Corporation 5 Giralda Farms, 2A Madison, New Jersey 07940		Name and Address of Operator
Location of Activity/Facility *(Street Address)* Lot: 2 Block: 342 Twp: Bridgewater County: Somerset	Issuing Division Land Use Regulation Program	Statute(s) NJSA 13:9B-1 NJSA 13:1D-1 NJSA 58:10A-1 NJSA 58:16A-50, et. seq.

Type of Permit Stream Encroachment FHA 050001 Freshwater Wetlands FWW 050001 GP 4	Maximum Approved Capacity, if applicable

This permit grants permission to:

excavate approximately 27,000 cubic yards of hazardous material from Impoundment 15 and backfill with approximately 5,400 cubic yards of clean fill and to excavate approximately 31,000 cubic yards of hazardous material from Impoundment 16 and backfill with approximately 6,200 cubic yards of clean fill and to remove contaminated material from the drying area, all in the floodway of the Raritan River, within Lot No. 2 of Block No. 342, located immediately southerly of the Cuckold's Brook crossing under the Lehigh Valley Railroad/Port Reading Railroad , in the Township of Bridgewater, Somerset County, New Jersey. This permit also authorizes the disturbance of Freshwater wetland transition area for removal of hazardous materials associated with the remediation areas of Impoundment 15 and 16 and the drying area under a General permit No. 4.

Prepared By: ____________________
George Davis

(See page 4 for Section Chief's signature.)

Revised Date	Approved by the Department of Environmental Protection Name (Print or Type) ____________________ Title ____________ Signature ____________________ Title ____________

R2-0007854

Terms And Conditions

This permit is subject to the following terms and conditions:

1. This permit is revocable, or subject to modification or change at any time, pursuant to the applicable regulations, when in the judgement of the Department of Environmental Protection of the State of New Jersey such revocation, modification or change shall be necessary.

2. The issuance of the permit shall not be deemed to affect in any way action by the Department of Environmental Protection of the State of New Jersey on any future application.

3. The works, facilities, and/or activities shown by plans and/or other engineering data, which are this day approved, subject to the conditions herewith established, shall be constructed and/or executed in conformity with such plans and/or engineering data and the said conditions.

4. No change in plans or specifications shall be made except with the prior written permission of the Department of Environmental Protection of the State of New Jersey.

5. The granting of this permit shall not be construed to in any way affect the title or ownership of property, and shall not make the Department of Environmental Protection or the State a party in any suit or question of ownership.

6. This permit does not waive the obtaining of Federal or other State or local government consent when necessary. This permit is not valid and no work shall be undertaken until such time as all other required approvals and permits have been obtained.

7. A copy of this permit shall be kept at the work site, and shall be exhibited upon request of any person.

8. In cases of conflict, the conditions of this permit shall supersede the plans and/or engineering data.

9. Limit and Extent of Approval

    a. This approval grants permission to the applicant and/or its agents to undertake an activity regulated by the State of New Jersey as described by the text of this permit and as detailed by the herein approved plans. Any construction, grading, removal of vegetation, or other activity at this site within or affecting a regulated flood plain, other than specifically approved by this permit or as detailed by the approved drawings, shall require additional approvals from the Department. The commencement of such regulated activities without the appropriate approvals shall be in violation of State law.

    b. All activities authorized by this permit shall be completed within five years of the issuance date as listed on the first page of this document. At that time, this approval, if not previously revoked, shall automatically become null and void, and none of the activities referenced herein may commence or continue until a new approval has been granted by the Department.

10. Method of Construction

a. All activities approved by this permit shall be performed under the supervision and direction of a Professional Engineer licensed in the State of New Jersey, and shall be undertaken using the best management practices available. Furthermore, the site shall be subject to inspection at any time by representatives of the Department to ensure the continuous application of the provisions of this permit.

b. During the course of construction, neither the applicant nor its agents shall cause or permit any unreasonable interference with the free flow of the stream by placing or dumping any materials, equipment, debris or structures within or adjacent to the stream corridor. Upon completion or abandonment of the work, the applicant and/or its agents shall remove and dispose of in a lawful manner all excess materials, equipment and debris from the stream corridor and adjacent lands.

c. All activities authorized by this permit shall be stabilized in accordance with the *Standards for Soil Erosion and Sediment Control in New Jersey* (obtainable from local Soil Conservation District offices), or equal engineering specifications, to prevent eroded soil and sediment from entering adjacent waterways and wetlands at any time during and subsequent to construction. The Department reserves the right to order the suspension of any activity if unacceptable levels of erosion or turbidity result from the same. Furthermore, the applicant shall maintain the stream corridor as shown on the approved drawing/s for either such time as is required for the channel and/or banks to become reasonably stabilized, or for one year after completion of the project (as evidenced by a Certificate of Completion), whichever period of time is longer.

11. Responsibilities of Applicant

a. The granting of this permit does not in any way relieve the applicant and/or its agents from the responsibility for damages caused by any construction or activities hereby approved, nor does the Department accept responsibility for any structural designs.

b. No construction authorized by this permit may begin until the enclosed **permit acceptance form** has been signed by the applicant and is returned to the Department. By signing and submitting this form, the applicant accepts this permit in its entirety and agrees to adhere to all of its terms and conditions. Please be advised that this permit may be declared null and void should it be determined that adequate measures had not been taken by the applicant and/or its agents to ensure the continuous implementation of these terms and conditions.

c. Within ten (10) days of the receipt of this permit by the applicant, this permit shall be recorded in its entirety in the office of the County Clerk or the Registrar of Deeds and Mortgages for each county where this permit is located. Verified notice of this action shall be forwarded to the Department immediately thereafter.

d. The enclosed **construction notice** shall be completed by the applicant or its agent and submitted to the Department at least fourteen (14) days prior to the commencement of the herein approved activities.

e. The enclosed **completion report** shall be completed by a Professional Engineer licensed in the State of New Jersey and submitted to the Department within thirty (30) days after completion of the herein approved activities.

Terms And Conditions

12. All excavated material must be disposed of in a lawful manner outside of any regulated flood plain, open water, freshwater wetlands or adjacent transition areas, and in such a way as not to interfere with the positive drainage of the receiving area.

13. Provisions of the Freshwater Wetlands General Permit:

    Limit of Authorized Disturbance - The authorized activity involves the disturbance of freshwater wetland transition area for the removal of hazardous materials associated with the remediation of Impoundment areas 15 and 16 as well as the former "drying area" under a General Permit No. 4. Any additional disturbance of freshwater wetlands, State open waters and/or transition areas shall be considered a violation of the Freshwater Wetlands Protection Act unless a permit is obtained prior to the start of the disturbances from the Land Use Regulation Program.

    The transition area shall not be reduced to less than 10 feet in width as shown on the referenced plan.

14. The Land Use Regulation program has not reviewed this application for consistency with the Areawide Water Quality Management Plan and the issuance of this permit shall not be construed as an approval of any wastewater management plan for this project or site. There shall be no construction of any sewage generating structures unless and until the proposed development has been found to be consistent with the appropriate areawide water quality management plan.

15. Upon completion of the project, all temporarily disturbed upland areas within or affecting the regulated flood plain/floodway must be restored to their original condition using native soils and indigenous vegetation. Said restoration is to be accomplished under the recommendation and discretion of the local soil conservation district having jurisdiction over the project.

16. The drawing hereby approved is one (1) sheet prepared by the O'Brien & Gere Engineers, Inc., dated February 23, 2005, last revised February 23, 2005, entitled:

    "BOUND BROOK REMEDIAL PROGRAM IMPS. 15 & 16 CLOSURE PROGRAM"

    "EXCAVATION PLAN" sheet Attach. 9

______________________________ ______________
Madhu Guru, PE DATE
Section Chief
Northwest/central Engineering

Terms And Conditions

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF LAND USE REGULATION
501 East State Street, Station Plaza 5, 2nd Floor
P.O. Box 439, Trenton, New Jersey 08625-0439
Fax: (609) 777-3656 or (609) 292-8115
www.state.nj.us/dep/landuse

PERMIT

In accordance with the laws and regulations of the State of New Jersey, the Department of Environmental Protection hereby grants this permit to perform the activities described below. This permit is revocable with due cause and is subject to the limitations, terms and conditions listed below and on the attached pages. For the purpose of this document, "permit" means "approval, certification, registration, authorization, waiver, etc."

Approval Date

Expiration Date

Permit Number/s	Type of Approval/s	Enabling Statute/s
1806-02-0005.1 FHA 070001	Stream Encroachment	NJSA 13:1D-1 NJSA 58:10A-1 NJSA 58:16A-50, et. seq.

Applicant
Wyeth Holdings Corporation
5 Giralda Farms, 2A, Attn. John Egan
Madison, New Jersey 07940

Owner (if different from applicant)

Description of Authorized Activities and Limit of Disturbance

This permit grants permission to remove contaminated material from Impoundments 14 and 20, in the floodplain of the Raritan River, and transport to temporary treatment area for solidification and then deposit to Impoundment No. 8, outside the floodplain of the Raritan River, within Lot No. 2 of Block No. 340, located approximately 3500' westerly of the U.S. Route 287 crossing of the Lehigh Valley Rail Road, in Bridgewater Township, Somerset County, New Jersey.

Project Location
Lot No. 2
Block No. 8
Bridgewater Township
Somerset county, New Jersey

Received by County Clerk

Project Manager's Signature

George Davis
Telephone: (609) 984-0232

This permit is not valid unless authorizing signature appears on the last page.

R2-0007859

STANDARD CONDITIONS:

1. **Extent of approval:** This document grants permission to perform certain activities that are regulated by the State of New Jersey. The approved work is described by the text of this permit and is further detailed by the approved drawings listed below. All work must conform to the requirements, conditions and limitations of this permit and all approved drawings. You must keep a copy of this permit and all approved drawings readily available for inspection at the work site. Approved work may be altered only with the prior written approval of the Department. If you alter the project without prior approval, or expand work beyond the description of this permit, you may be in violation of State law and may be subject to fines and penalties.

2. **Acceptance of permit:** If you begin any activity approved by this permit, you thereby accept this document in its entirety and agree to adhere to all terms and conditions. If you do not accept or agree with this document in its entirety, **do not** begin construction. You are entitled to request an appeal within a limited time as detailed on the attached *Administrative Hearing Request Checklist and Tracking Form.* You may also contact the project manager shown on the first page if you have any questions or concerns about this document.

3. **Recording with County Clerk:** You must record this permit in the Office of the County Clerk for each county involved in this project. You must also mail or fax a copy of the front page of this permit to the Department showing the received stamp from each County Clerk within 30 days of the issuance date (or 90 days if multiple counties are involved). The Department's address and fax number are shown on the first page of this permit.

4. **Notice of Construction:** You must notify the Department in writing at least 7 days before you begin any work approved by this permit. The Department's address and fax number are shown on the first page of this permit. Please direct your letter to the project manager shown on the first page.

5. **Expiration date:** All activities authorized by this permit must be completed by the expiration date shown on the first page. At that time, this permit will automatically become invalid and none of the approved work may begin or continue until a replacement permit is granted. (Some coastal permits may qualify for an extension of the expiration date. Please contact the Department for further information.)

6. **Rights of the State:** This permit is revocable and subject to modification by the State with due cause. The State may inspect the work site and may suspend construction if work does not comply with this permit. This permit does not grant property rights. The issuance of this permit shall not affect any action by the State on future applications, nor affect the title or ownership of property, nor make the State a party in any suit or question of ownership.

7. **Other responsibilities:** You must obtain all necessary local, Federal and other State approvals before you begin work. All work must be stabilized in accordance with the *Standards for Soil Erosion and Sediment Control in New Jersey,* and all fill material must be free of toxic pollutants in toxic amounts as defined in section 307 of the Federal Act.

SPECIAL CONDITIONS IN ADDITION TO THE STANDARD CONDITIONS:

8. The drawings hereby approved are the total of three (3) sheets prepared by O'Brien & Gere, dated December 15, 2006, revsied December 15, 2006, unless otherwise noted, entitled:

"BOUND BROOK, NEW JERSEY SITE IMPOUNDMENTS 14 AND 20 CLOSURE"

"WORK AREA PLAN" sheet no. G-1, last revised April 12, 2007

"EXISTING MANAGED STOCKPILES/SOIL EROSION AND SEDIMENT CONTROL PLAN" sheet no. G-2

"IMPOUNDMENT 8 CONTRACT AREA AND PLACEMENT PLAN" sheet no. G-6

Madhu M. Guru, PE
Section Chief
Bureau of Inland Regulation

Date

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF LAND USE REGULATION
501 East State Street, Station Plaza 5, 2nd Floor
P.O. Box 439, Trenton, New Jersey 08625-0439
Fax: (609) 777-3656 or (609) 292-8115
www.state.nj.us/dep/landuse

PERMIT

In accordance with the laws and regulations of the State of New Jersey, the Department of Environmental Protection hereby grants this permit to perform the activities described below. This permit is revocable with due cause and is subject to the limitations, terms and conditions listed below and on the attached pages. For the purpose of this document, "permit" means "approval, certification, registration, authorization, waiver, etc."	Approval Date JAN 30 2008 Expiration Date JAN 30 2013

Permit Number/s	Type of Approval/s	Enabling Statute/s
1806-06-0014.3 FHA 070001 SEP	Stream Encroachment	NJSA 13:1D-1 NJSA 58:10A-1 NJSA 58:16A-50, et. seq.

Applicant	Owner (if different from applicant)
Wyeth Holdings Corporation 5 Giralda Farms, 2A Attn, John Egan Madison, New Jersey 07940	

Description of Authorized Activities and Limit of Disturbance

This permit grants permission to place temporary stockpiles of fill in the floodplain of the Raritan River and Chuckholds Brook, in connection with a future CERCLA Remedial Program for capping, within Lot No. 2 of Block No. 340, in the Township of Bridgewater, Somerset County, New Jersey.

Project Location	Received by County Clerk
Lot No. 2 Block No. 340 Township of Bridgewater Somerset County, New Jersey	

Project Manager's Signature

George Davis

George Davis
Telephone: (609) 984-0232

This permit is not valid unless authorizing signature appears on the last page.

R2-0007862

STANDARD CONDITIONS:

1. **Extent of approval:** This document grants permission to perform certain activities that are regulated by the State of New Jersey. The approved work is described by the text of this permit and is further detailed by the approved drawings listed below. All work must conform to the requirements, conditions and limitations of this permit and all approved drawings. You must keep a copy of this permit and all approved drawings readily available for inspection at the work site. Approved work may be altered only with the prior written approval of the Department. If you alter the project without prior approval, or expand work beyond the description of this permit, you may be in violation of State law and may be subject to fines and penalties.

2. **Acceptance of permit:** If you begin any activity approved by this permit, you thereby accept this document in its entirety and agree to adhere to all terms and conditions. If you do not accept or agree with this document in its entirety, **do not** begin construction. You are entitled to request an appeal within a limited time as detailed on the attached *Administrative Hearing Request Checklist and Tracking Form.* You may also contact the project manager shown on the first page if you have any questions or concerns about this document.

3. **Recording with County Clerk:** You must record this permit in the Office of the County Clerk for each county involved in this project. You must also mail or fax a copy of the front page of this permit to the Department showing the received stamp from each County Clerk within 30 days of the issuance date (or 90 days if multiple counties are involved). The Department's address and fax number are shown on the first page of this permit.

4. **Notice of Construction:** You must notify the Department in writing at least 7 days before you begin any work approved by this permit. The Department's address and fax number are shown on the first page of this permit. Please direct your letter to the project manager shown on the first page.

5. **Expiration date:** All activities authorized by this permit must be completed by the expiration date shown on the first page. At that time, this permit will automatically become invalid and none of the approved work may begin or continue until a replacement permit is granted. (Some coastal permits may qualify for an extension of the expiration date. Please contact the Department for further information.)

6. **Rights of the State:** This permit is revocable and subject to modification by the State with due cause. The State may inspect the work site and may suspend construction if work does not comply with this permit. This permit does not grant property rights. The issuance of this permit shall not affect any action by the State on future applications, nor affect the title or ownership of property, nor make the State a party in any suit or question of ownership.

7. **Other responsibilities:** You must obtain all necessary local, Federal and other State approvals before you begin work. All work must be stabilized in accordance with the *Standards for Soil Erosion and Sediment Control in New Jersey,* and all fill material must be free of toxic pollutants in toxic amounts as defined in section 307 of the Federal Act.

SPECIAL CONDITIONS IN ADDITION TO THE STANDARD CONDITIONS:

8. In order to protect the general fishery resource within the Raritan River and Cuckholds Brook any proposed grading or construction activities within the banks of this or any other stream on site are prohibited between May 1 to June 30 of each year. In addition, any activity within the 100-year flood plain or flood hazard area of these watercourses, which could introduce sediment into said stream or which could cause an increase in the natural level of turbidity is also prohibited during this period. The Department reserves the right to suspend all regulated activities on site should it be determined that the applicant has not taken proper precautions to ensure continuous compliance with this condition.

9. The applicant must stabilize the soil stockpiles by seeding them immediately after placement.

10. The soil stockpiles must be either removed or used for the capping of contamination on the site within 1 year of the date of placement. The actual re-grading of the site, or the re-distribution of fill will require a separate Flood Hazard Area Permit from this office.

11. The drawings hereby approved are five (5) sheets prepared by O'Brien & Gere, dated October 3, 2007, last revised January 26, 2008, unless otherwise noted, entitled:

"WYETH HOLDINGS CORPORATION BOUND BROOK REMEDIAL PROGRAM BOUND BROOK, NEW JERSEY"

"REMEDIATION CAPPING PROGRAM WORK AREA PLAN" sheet no. G-1,

"REMDIATION CAPPING PROGRAM SOIL EROSION AND SEDIMENT CONTROL PLAN AND DETAILS" sheet no. G-2, revised October 3, 2007,

"REMEDIATION CAPPING PROGRAM STOCKPILE CROSS-SECTIONS" sheet no. G-3, dated January 26, 2008,

"REMEDIATION CAPPING PROGRAM EXISTING SITE PLAN AND FLOOD ELEVATION" sheet no. G-4, dated January 26, 2008, and

"REMEDIATION CAPPING PROGRAM FLOOD ELEVATION SECTIONS" sheet no. G-5, dated January 26, 2008.

Madhu Guru

Madhu M. Guru, PE
Supervisor
Bureau of Inland Regulation

1/30/08
Date

FLOOD FRINGE

2 POTENTIAL SOIL STOCKPILE AREA

1 FLOOD HAZARD AREA DESIGN FLOOD

APPROVED
1806-06-0014.3
JAN 30 2008
Department of Environmental Protection
Land Use Regulation Program

NO.	DATE	REVISION
2	1/26/08	REVISED PER NJDEP LAND USE (
1	12/5/07	REVISED PER NJDEP LAND USE (
0	10/3/07	ISSUED FOR PERMIT APPROVAL

1"=200' 200 0 200

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED BY ANY MEANS. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

O'BRIEN & GER

WYETH HOLDINGS CORP
BOUND BROOK REMEDIAL
BOUND BROOK, NEW

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS ACTING UNDER THE DIRECTION OF A LICENSED ENGINEER, TO ALTER THIS DOCUMENT.

REMEDIATION CAPPING
WORK AREA P

IT IS A VIOLATION OF LAW FOR ANY PERSON UNLESS HE IS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER TO ALTER THIS DOCUMENT.

STEVEN J. ROLAND

Steven J. Roland

N.J. PROFESSIONAL ENGINEER
NO. 33629

IN CHARGE OF MAUREEN T. HOKE

DESIGNED BY AMM CHECKED BY MTH

DRAWN BY AG

FILE NO. 5772.42(

DATE 10/3

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APPROVED
1806-06-0014.3
JAN 30 2008
Department of Environmental Protection
Land Use Regulation Program

NO.	DATE	REVISION
0	10/3/07	ISSUED FOR PERMIT APPROVAL

1"=200' 200 0 200

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED BY ANY MEANS. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

O'BRIEN & GERE

WYETH HOLDINGS CORPO
BOUND BROOK REMEDIAL F
BOUND BROOK, NEW JE

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS ACTING UNDER THE DIRECTION OF A LICENSED ENGINEER, TO ALTER THIS DOCUMENT.

REMDIATION CAPPING PR
SOIL EROSION AND S
CONTROL PLAN AND

IT IS A VIOLATION OF LAW FOR ANY PERSON UNLESS HE IS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER TO ALTER THIS DOCUMENT.

STEVEN J. ROLAND

Steven J. Roland

N.J. PROFESSIONAL ENGINEER
NO. 33629

IN CHARGE OF MAUREEN T. HOKE

DESIGNED BY AMM CHECKED BY MTH

DRAWN BY AG

FILE NO.
5772.4019

DATE
10/3/0

ELEVATIONS SHOWN ARE REFERENCED TO FACILITY DATUM. (FACILITY DATUM BASED ON U.S.G.S. NGVD 29

APPROVED
1806-06-0014.3
JAN 30 2008
Department of Environmental Protection
Land Use Regulation Program

NO.	DATE	REVISION
0	1/26/08	ISSUED FOR PERMIT APPROVAL

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STEVEN J. ROLAND

Steven J. Roland

N.J. PROFESSIONAL ENGINEER
NO. 33629

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DESIGNED BY AMM CHECKED BY MTH

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FILE NO. 5772.420

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STEVEN J. ROLAND

Steven J. Roland

N.J. PROFESSIONAL ENGINEER
NO. 33629

IN CHARGE OF MAUREEN T. HOKE

DESIGNED BY AMM CHECKED BY MTH

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JAN 30 2008

Department of Environmental Protection

Land Use Regulation Program

NO.	DATE	REVISION
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STEVEN J. ROLAND

Steven J. Roland

N.J. PROFESSIONAL ENGINEER
NO. 33629

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FILE NO. 5772.4203

DATE 1/26/

R2-0007869

American Cyanamid Superfund Site Proposed Plan Comments
rspiegel
to:
Joseph Battipaglia
05/14/2012 05:21 PM
Cc:
Judith Enck, Walter Mugdan, "Carolyn Fefferman", "Zoe Baldwin", "Wright Tuley", "Bill Schultz", "Bill Wolfe", "jeff tittel", "Cindy \(Clean", "Lisa Plevin", Bonnie Bellow
Hide Details
From: <rspiegel@edisonwetlands.org> Sort List...

To: Joseph Battipaglia/R2/USEPA/US@EPA

Cc: Judith Enck/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, "Carolyn Fefferman" <carolyn_fefferman@menendez.senate.gov>, "Zoe Baldwin" <Zoe_Baldwin@lautenberg.senate.gov>, "Wright Tuley" <Tuley.Wright@mail.house.gov>, "Bill Schultz" <raritan.riverkeeper@verizon.net>, "Bill Wolfe" [redacted] "jeff tittel" <jeff.tittel@sierraclub.org>, "Cindy \(Clean" <Zipf@CleanOceanAction.org>, "Lisa Plevin" <Plevin.Lisa@epamail.gov>, Bonnie Bellow/R2/USEPA/US@EPA

History: This message has been forwarded.

6 Attachments

Am Cyan 1% propability Floodplain.pdf Proposed Plan Comment letter Cover letter FINAL 5-14-12.pdf

2012-05-14 AmCyan Proposed Plan Comments X-2 FINAL.pdf NJDEP Land Use Permit 2005.doc

NJDEP Land Use Permit 2007.doc attz0loj.pdf

Dear Mr. Battipaglia,

On behalf of the environmental nonprofit organizations Edison Wetlands Association, New Jersey Sierra Club, Clean Ocean Action, New Jersey Public Employees for Environmental Responsibility, and the Raritan Riverkeeper, please find the attached cover letter, technical memo, floodplain map, and 3 NJDEP permits for submission in the American Cyanamid Superfund Site Proposed Plan public comment period.

Please confirm that you have received this email and you are able to open the attachments. If you have any questions, I can be reached directly at 732-321-1300. Thank you.

Respectfully,

Bob Spiegel
Executive Director
Edison Wetlands Association
PO Box #1208
South Plainfield, NJ 07080
Phone: (732) 321-1300
Fax: (732) 372-7866
www.edisonwetlands.org

American Cyanamid Superfund Site Proposed Plan Comments
rspiegel
to:
Joseph Battipaglia
05/15/2012 01:20 AM
Cc:
Judith Enck, Walter Mugdan, "Carolyn Fefferman", "Zoe Baldwin", "Wright Tuley", "Bill Schultz", "Bill Wolfe", "jeff tittel", "Cindy \(Clean", "Lisa Plevin", Bonnie Bellow, Lisa Plevin, "Alan Godber", "Aaron Kleinbaum", dana, "Rich CHAPIN", Joe Rotola, dwheeler
Hide Details
From: <rspiegel@edisonwetlands.org> Sort List...

To: Joseph Battipaglia/R2/USEPA/US@EPA

Cc: Judith Enck/R2/USEPA/US@EPA, Walter Mugdan/R2/USEPA/US@EPA, "Carolyn Fefferman" <carolyn_fefferman@menendez.senate.gov>, "Zoe Baldwin" <Zoe_Baldwin@lautenberg.senate.gov>, "Wright Tuley" <Tuley.Wright@mail.house.gov>, "Bill Schultz" <raritan.riverkeeper@verizon.net>, "Bill Wolfe" [redacted] "jeff tittel" <jeff.tittel@sierraclub.org>, "Cindy \(Clean" <Zipf@CleanOceanAction.org>, "Lisa Plevin" <Plevin.Lisa@epamail.gov>, Bonnie Bellow/R2/USEPA/US@EPA, Lisa Plevin/R2/USEPA/US@EPA, [redacted], "Aaron Kleinbaum" <akleinbaum@easternenvironmental.org>, dana@edisonwetlands.org, "Rich CHAPIN" <rwc27q@verizon.net>, Joe Rotola/R2/USEPA/US@EPA, dwheeler@edisonwetlands.org

History: This message has been replied to.

6 Attachments

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On behalf of the environmental nonprofit organizations Edison Wetlands Association, New Jersey Sierra Club, Clean Ocean Action, New Jersey Public Employees for Environmental Responsibility, and the Raritan Riverkeeper, please find the attached cover letter, technical memo, floodplain map, and 3 NJDEP permits for submission in the American Cyanamid Superfund Site Proposed Plan public comment period.

I am resubmitting these and will send them to you via certified US mail as I noticed in my first attempt that at least one of the USEPA cced sent the e-mail had it bounce back.

I would also like to request that the Edison Wetlands Association and our project partners including Jeff Tittel, William Schultz , Bill Wolfe and Cindy Ziff as well as our technical team be allowed to meet with US EPA and your technical team and discuss our comments in detail.

The US EPA had allowed the public discourse as well the community involvement at this site to be hijacked and minimized by a select few individuals and this approach has to change.

The site failures continue to endanger public health and the environment and the US EPA must change how you are approaching community relations and involvement with regards to cleanup of American Cyanamid Superfund Site.

This proposed cleanup has far reaching local, regional, statewide and nationwide impacts. The undersigned group are requesting the US EPA, your technical and management review our comments let us know what dates are available for you to meet so we can coordinate a meeting in Region 2 Edison NJ with in the next 2 weeks.

We want to meet before EPA finalize its decision and relegate our important technical, policy and administrative concerns to the administrative record and obscurity.

In short, this site is too important to the state, region and country to simply bury our concerns along with the site back into obscurity for another decade. More can and should be considered and done before the USEPA and Pfizer can move forward with the cleanup.

Please confirm that you have received this email and you are able to open the attachments. If you have any questions, I can be reached directly at 732-321-1300.

Thank you.

Respectfully,
Bob Spiegel
Executive Director
Edison Wetlands Association
PO Box #1208
South Plainfield, NJ 07080
Phone: (732) 321-1300
Fax: (732) 372-7866
www.edisonwetlands.org

Mr. Joseph Battipaglia
United States Environmental Protection Agency
Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

RE: American Cyanamid Superfund Site (EPA ID#: NJD002173276)
Proposed Plan Public Comments
Bridgewater, Somerset County, New Jersey

Dear Mr. Battipaglia,

On behalf of the environmental nonprofit organizations Edison Wetlands Association, Clean Ocean Action, New Jersey Sierra Club, Raritan Riverkeeper and New Jersey Public Employees for Environmental Responsibility, we respectfully request the United States Environmental Protection Agency (USEPA) require Pfizer to permanently remediate the 80-year old leaking toxic dump, also known as the American Cyanamid Superfund Site located in Bridgewater, New Jersey. Please include our technical comments (attached) as well our comments below into the public record. Our serious concerns must be completely addressed before USEPA makes a permanent decision on the site remedy.

This Proposed Plan falls far too short of the what needs to be done to address human health and environmental threats from this over 500-acre, leaking toxic waste site. This site was the target of a scathing USEPA Inspector General Report which named it one of the most problematic sites in New Jersey history, and documents that USEPA and NJDEP did not ensure this Superfund site cleanup progressed at a timely pace, along with numerous other failures. The USEPA cleanup does not address deficiencies found in this audit. The report can be found here: http://www.epa.gov/oig/reports/2008/20080602-08-P-0169.pdf.

Multiple regulatory oversight remediation failures have resulted in the carcinogen benzene being discharged at 20,000 times the allowable standard into the Raritan River. In addition, when the site cleanup was halted after the initial failed Record of Decision, the public was misled into agreeing to the delay so USEPA and the responsible party could essentially come up with an effective remedy.

Now, after almost a decade of mismanagement, USEPA approved the billion dollar, international pharmaceutical giant Pfizer's prophylactic cleanup plan, which is incomplete and not in the best interest of the public's health and safety. Choosing the least effective cleanup plan that will leave leaking toxic chemical poisons behind by covering it, will only pass it down to become problems for our children. We are also concerned that discussions with the public did not reflect the past failed remediation decisions and actions that have resulted in human health and environmental exposures that continue even today. USEPA has mishandled this site from the beginning, and it's time to put the residents first.

In order to protect human health and the environment, USEPA must require Pfizer to remediate the site using a modified version of "Alternative 7," and not "Alternative 4A," as described in their 2012 Proposed Plan. Alternative 4A is one of the least costly for alternatives for Pfizer, and is only a quarter of the cost of a comprehensive cleanup. USEPA must to go back and reevaluate their options and present the public with a more comprehensive, holistic, permanent solution that is protective of both human health and the environment.

The selected remedy, Alternative 4A, will not be protective of human health and the environment for the following reasons:

Filling in a floodplain and capping the site is NOT a full or permanent remediation. The Proposed Plan Alternative 4A proposes to cover the contamination with a combination of soil and engineering caps, which will take 10 years to implement. In addition, filling of a flood zone is subject to both New Jersey and Federal regulations. These regulations specify that there can be no net fill in a flood zone. Pfizer claims there will be no net filling in their capping plan, yet that is not true as the entire area, not just the fenced site, falls within a high-risk floodplain.

The most recent flood Hurricane Irene showed the site can hold at least 300,000,000 gallons of water. Placing two feet of fill on the site will reduce its flood storage capacity and will likely exacerbate the regional flooding issues in the area. The USEPA claims that this cap will be built to withstand a 500-year flood. This area floods regularly just with normal amounts of rain, and this cap would likely fail after every major rain event. Also, the effect of solidifying parts of the site and capping in a floodplain this enormous is not a permanent long-term solution - it's simply an engineering control. **All caps fail, it's just a matter of time. This proposed cap would take 10 years to build and 10 minutes to fail.**

In addition, capping this site violates USEPA's preference for permanent, cost effective, and protective cleanups. The proposed alternative fails to mandate compliance with Clean Water Act (CWA) Applicable or Relevant and Appropriate Requirements (ARARs) in the form of NJ Surface Water Quality Standards (SWQS) and New Jersey Pollutant Discharge Elimination System (NJPDES) permit requirements, in this case, what are known as Water Quality Based Effluent Limits (WQBEL's). The consultants for the water authority have also raised this issue, as well as the failure of the NJDEP NJPDES General Permit (GP) to include effluent limitations for all parameters discharged, as required by NJ SWQS. Therefore, any discharge to the river must comply with NJ SWQS and NJPDES WQBEL effluent limits (at point of discharge, not mixing zone).

We join the thousands who signed and submitted comments in voicing our serious concerns that Alternative 4A will drastically expand serious toxic flooding for thousands of neighboring families that are already plagued by heavy flood waters. The plan that USEPA must approve should permanently cleanup this site as well as assuring it will not exacerbate flooding in the Raritan River.

The United States Army Corps of Engineers is actively working on flood control projects in the Raritan River Watershed to help alleviate flooding in Manville, Bound Brook, Bridgewater and all surrounding towns. The site is a natural fit for a regional flood control project and can be an environmental benefit for the region if the proper remedy is selected.

The Proposed Plan outlines more applicable cleanup alternatives than Alternative 4A suggests, including Low Temperature Thermal Desorption (LTTD) (Alternative 7). This method was successfully used at the Cornell-Dubilier Superfund Site in South Plainfield, New Jersey to remediate soils with high levels of PCBs and heavy metals without disturbing the surrounding community. The cost estimates for the alternatives appear to be inflated and falsely position the capping alternative to be the most cost effective, and there must be a detailed analysis for the cost of a low temperature thermal desorption unit. In addition to USEPA evaluating LTTD, they should also consider this method in combination with other techniques, such as off-site disposal at their existing RCRA facility across the street, and other innovative technologies, such as bio remediation with specialized microorganisms. In addition, USEPA and Pfizer should take into consideration using the active rail line that runs through the site to properly dispose of this material. USEPA must choose the most protective remedy now and implement it in an acceptable time frame. Capping a site should not take 10 years to complete, which means the time frames for other alternatives are probably exaggerated as well.

USEPA and Pfizer must do comprehensive treatability studies on the various waste streams before, not after, they decide on which technologies are best suited to clean up this site. A comprehensive study and bench scale testing using best available cleanup technologies to determine which technologies must be used for the various wastes present on site must be completed prior to selecting a remedy.

With dozens of permanent environmental cleanup options, which are being used throughout the United States, why is the lowest cost and least protective technology being offered as the only practical and cost effective solution? We support the plans put forth by the nationally recognized environmental expert, Chapin Engineering, who recommends using LTTD and other advanced technologies as appropriate remedies for the various toxic and other wastes disposed of on site.

This year, Pfizer will spend upwards of $8 billion on research. With some of the finest minds in the world and a CEO with a chemical engineering degree, why is Pfizer using cheap and outdated technology to cleanup this site? We need USEPA to protect public health and the environment, not the profits of Pfizer Executives Ian Read, Sally Susman, and Frank D'Amelio!

This site cleanup has been languishing for over two decades, and it is time for USEPA to take serious action. In order to protect the health and safety of families that utilize this area for recreation, USEPA must require a proper cleanup, such as a modified version of Alternative 7 in the Proposed Plan. This current plan for filling a toxic waste floodplain is unacceptable and threatens the Raritan River Estuary and the millions of New Jersey residents who live near or downstream from the site. The public and the environment must be considered first and foremost and this cleanup proposal will do nothing more than leave problems for our future generations, while putting the community and Raritan River in perpetual risk from this site.

Thank you for your consideration and timely assistance on this important environmental issue. If you have any questions, Robert Spiegel will serve as the point of contact, and can be reached directly at 732-321-1300 or via email at rspiegel@edisonwetlands.org.

Respectfully,

Robert Spiegel
Executive Director
Edison Wetlands Association

Jeff Tittel
Director
NJ Sierra Club

Cindy Zipf
Executive Director
Clean Ocean Action

Bill Schultz
Raritan Riverkeeper

Bill Wolfe
Director
NJ Public Employees for Environmental Responsibility

CHAPIN ENGINEERING
A PROFESSIONAL CORPORATION
"Experience Matters"
R.W. Chapin, M.S., P.E., *President*
Board Certified Environmental Engineer

Memorandum

TO: Robert Spiegel, Executive Director, Edison Wetlands Association
FROM: R.W. Chapin, P.E.
DATE: May 8, 2012
RE: Review & Comments on the USEPA's Proposed Plan for the Wyeth Holdings Corporation American Cyanamid Superfund Site, Township of Bridgewater, New Jersey

In accordance with Edison Wetland Association's (EWA) request, Chapin Engineering has reviewed the referenced Proposed Plan (PP) for the Wyeth Holdings Corporation (which is wholly owned by Pfizer) American Cyanamid Superfund site (the "Site"). Comments are provided below after a synopsis of the United States Environmental Protection Agency's (USEPA's) selected remedy for the Site.

Comments are provided by specific topics and each should be satisfactorily addressed prior to issuing a Record of Decision for the Site.

Proposed Plan Synopsis

The PP is defined in the Site's Feasibility Study (FS) as Alternative 4A, and this "preferred alternative" is described by the USEPA as having the following key elements: Consolidation/Treatment/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Ground Water. As summarized by the USEPA, the remedial methods to address soil and groundwater contamination at the site include these remedial actions:

- Excavation of contaminated materials from outside the Site's embankment and placing these materials inside the embankment.
- After movement of materials inside the embankment, a two (2) feet thick soil cap/cover will be placed over the entire area within the embankment. This cover will include a vapor barrier over specific areas where vapor control is needed.
- Specific areas of within the embankment that meet the definition of Principal Threat Wastes (PTW) would be treated via "...in-situ solidification/stabilization or a similar physical process as determined to be appropriate during the conceptual design phase..." Impoundments 3, 4 & 5, as well as areas outside the embankment and soils proximate to those impoundments, are indicated as areas where Principal Threat Wastes [PWT] "....may to present..."
- Contaminated bedrock groundwater has been recovered and treated for a considerable period. The PP will upgrade this system to enhance control and recovery of this groundwater. In addition, an overburden groundwater collection and treatment system will be implemented.
- The PP indicates the following costs (rounded to nearest $10,000) for the preferred alternative 4A. Implementation for the soils work is given as 10 years, while the groundwater remediation is stated as requiring 30 years.
    - Capital Cost: $154,000,000.
    - Annual O&M: $50,000,000.
    - Total Present Worth: $204,000,000.

R2-0007878

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Memorandum

DATE: May 8, 2012
RE: Review & Comments on the USEPA's Proposed Plan for the Wyeth Holdings Corporation American Cyanamid Superfund Site, Township of Bridgewater, New Jersey

General Comments

- The PP will not remediate the Site to an unrestricted use and will rely on **engineering controls** (i.e., a capping and cover system) to control exposure to the wastes left on the Site. These controls **will require maintenance in perpetuity** or until that point in the future when the wastes are removed or not longer pose a threat to groundwater or the environment. **This fact is not explicitly stated in the PP and must be in order that all stakeholders understand that the Site, which is currently a waste disposal site, will remain as a waste disposal site.** Any future use will be controlled by the fact that it must set, as its first priority, maintenance of the site as a secure waste disposal area. It also must be explicitly stated that any alteration or modification to these engineering control requires prior approval by the USEPA.
- **The PP will require recording of a notice in the deed(s)** for the property the presence of the wastes left behind and restrictions of future use that will assure the engineering controls are maintained in perpetuity. **This fact is not explicitly stated in the PP and must be so all present and future stakeholders know there are specific restrictions on the Site that will run with the land in perpetuity.**
- There is a permitted, hazardous waste disposal facility on the Site, known as Impoundment 8. This was designed and constructed to receive wastes from the other areas of the Site. It accepted wastes from the Site during prior remedial actions. The PP makes **little or no use of this facility**, which is currently well below its permitted capacity. This creates a critical question: Why isn't it being used? Use of this facility could reduce the amounts of wastes left on the Main Plant, thus reducing restricted area of the Site and likely facilitating its re-use. **USEPA must explain why Impoundment 8 is not being used by the PP for cleanup of the Site, when that is its purpose.**
- Typically Principal Threat (PTW) waste (i.e. impacted soils) are removed or treated at the site. The volume of PT materials to be consolidated is around 145,000CY. This would represent about $50 million to remove and treat/dispose of the materials offsite. This represents represent a 25% increase in the capital cost (minus the cost of on-site stabilization which is not treatment but rather containment). Removal of the most harzardous materials, that are mobile, should be considered in the final remedy selection.
- **The PP has a ten year time line for completion of its proposed soil remediation, but the basis for this extended period is provided. A detailed schedule for this project and justification for the stated time must be provided before selection.**
- **Burrowing animals may pierce Site capping and bring wastes to the surface. The PP must assure exposure via this mechanism will not happen.**

Impacts of the PP on Flooding

- The **Site is located directly adjacent to the Raritan River**. Historically, an earthen embankment was constructed to control of flooding of the plant site. The FS, hence the PP, dissect the site into two basic areas: the "Main Plant", which is the area inside the historic embankment; and "Flood Plain", which is the area between the embankment and the Raritan River.

CHAPIN ENGINEERING
A PROFESSIONAL CORPORATION
"Experience Matters"

Memorandum

DATE: May 8, 2012
RE: Review & Comments on Proposed Plan & Feasibility Study for the American Cyanamid Superfund Site, Bridgewater, New Jersey

- The dissection of the site into these pieces and its basis is not provided by either the PP or the FS. This artificial dissection is believed as being simply carried forward from past reports concerning the site and its contamination, without being questioned. The earthen embankment is believed to have been historically constructed to shield the Site's from flooding by the Raritan River.
- As shown on the attached FEMA flood map, **the entire site resides within the flood plain of the 1% probability flooding event.** The problem of Site flooding is clearly evidenced by the actions of Hurricane Irene in August 2011, when the entire site was completely submerged and USEPA estimated it held 300,000,000 gallons of flood water. What is the design of the surface cap that may be located in floodway scour conditions? No details are provided. Does the flooding of the site eliminate groundwater containment and for how long? Does the presence of standing water over the capped areas provide a hydraulic head to the movement of impacted waters?
- Consequently, the dissection of the site by the FS and, consequently, the PP is not appropriate. The remedy that is implemented for this site MUST view the entire site as residing in the floodplain and must be designed and implemented with, at a minimum, zero impacts upon flooding of the Raritan River.
- Table 16 of the FS presents "ARAR's, Criteria and Guidance" for evaluating and selecting a remedy. Floodplain Management is identified as a "Standard Requirement" to be considered; specifically Executive Order #11988 "Requires evaluations of alternatives that impact floodplains, and a floodplain value assessment." No discussion has been provided on how this the floodplain ARAR will be met or if not met what will be the potential impact. This requirement was only partially fulfilled.
- Review of the FS found the excavations activities that would occur outside the earthen embankment, and in the floodway, had been evaluated relative to floodplain impacts and permits for those activities had been granted by the New Jersey Department of Environmental Protection (NJDEP). **Why was filling of the flood plain in to Main Plant area ignored?**
- Based on the volumes utilized in the cost estimate for the PP (Alternative 4A), approximately 600,000 cubic yards of fill will placed inside the earthen embankment by waste relocations and for the cap/cover. This represents a significant filling of the floodplain.
- Placement of fill in a floodplain requires a permit under New Jersey's Flood Hazard regulations. The FS states [see page 94] "A permit for placement of the fill for capping within a flood plain has already been obtained from NJDEP". The NJDEP was contacted and they supplied copies of the two permits (noted above) they apparently had issued [copies attached]. Both of these permits are for excavation of materials outside the embankment and their placement inside the embankment. To date **NJDEP has provided no permit for the importation of 600,000 cubic yards of fill.** Consequently, the inclusion of the statement in the FS implying all required permits were in hand requires an explanation and correction.

CHAPIN ENGINEERING
A PROFESSIONAL CORPORATION
"Experience Matters"

Memorandum

DATE: May 8, 2012
RE: Review & Comments on Proposed Plan & Feasibility Study for the American Cyanamid Superfund Site, Bridgewater, New Jersey

- The appropriate means to evaluate the impact of the PP's floodplain filling is use of the HEC-RES model, which is a standard tool used by the U.S. Army Corps of Engineers to evaluate the impacts of changes on a river basin's flooding. Given the history of flooding in the Raritan and the major flood control project that is on-going the Bound Brook, we suspect the Raritan Basin has an existing model that could be utilized. This question must be answered prior to implementation of the remedy for the site: **What is the impact, both upstream and downstream, of eliminating 600,000 cubic yards of storage by filling of the American Cyanamid site?**
- If flooding is increased as the result of the PP, the impacted residents can be expected to seek compensation. Consequently, a comprehensive assessment of the floodplain impacts must be modelled to assure the selected remedy does not exacerbate flooding in the Raritan River basin.
- **Complete reliance of capping and solidification of the on-site wastes is not appropriate methods of cleanup due to this site location within the high risk flood plain. Wastes must be removed to the maximum extent practical.**

Principal Threat Wastes

- Principal Threat Wastes (PTW) are sources materials considered to be highly toxic or highly mobile that generally cannot be reliably contained or would present a significant risk to human health or the environment should exposure occur.
- The materials in impoundments 3, 4 & 5 are represented by the PP as "...may be..." Principal Threat Wastes in the text. By this juncture in this project (25+years), the characteristics of the Site's wastes should be known and which wastes are PTW should be known. **How can a remedy be selected when the waste types are not ascertained?**
- The PP relies solely on containment (i.e. solidification/stabilization) to manage the PTW, yet no testing of the process to be used on the specific PTW contained in Impoundments 3, 4 & 5 were reported in the FS. The best description of the Site's wastes is "highly heterogeneous", so past uses of solidification/stabilization (S/S) at the Site must be viewed with a jaundiced eye. The PP pushes the testing of these specific materials off until the design phase, but nothing is provided to address the question: What happens if S/S doesn't work? A treatability study of these wastes is required now, before remedy selection. A Feasibility Study means to evaluate whether or not an alternative will work. And the current FS does not adequately address application of S/S to Impoundments 3, 4 & 5.
- Is the PTW to be stabilized or solidified? There is a big difference given the mobility of the PTW material. The PP should indicate which is being done and technical details such as percent cement and strength of solidified mass to be achieved. Merely stabilizing the PTW does not limit the mobility.
- **The ability of the PP's "Preferred Alternative" to work must be ascertained before it is selected. In 1998, the USEPA issued a ROD for these same impoundments. That selected remedy was found to be wrong after subsequent work during the design phase. We recommend a very hard re-evaluation of the PP by USEPA so it can assure the public that history will not repeat itself.**

Memorandum

DATE: May 8, 2012
RE: Review & Comments on Proposed Plan & Feasibility Study for the American Cyanamid Superfund Site, Bridgewater, New Jersey

- Justification for only containing PTW on-site and not providing treatment or offsite removal is, apparently, concerns vapor emissions during excavation. The proposed S/S will have vapor emissions that must be controlled. No quantitative evaluation of the emissions from these options was provided to the FS or discussed in the PP. What is the amount of VOC release with the proposed onsite actions versus an off-site removal action? Control of vapors during remedial actions via excavation within a temporary structure and control and treatment of emissions from that structure is a commonly employed remedial technology.
- The PP takes credit for toxicity reduction by S/S in its alternative evaluation. How does this alternative reduce toxins?
- S/S activities drive volatile organics from the wastes that are subjected to this process due to physical mixing and heat generation. Consequently, S/S must be conducted under the same controls as excavation. The selection of treatment only requires explanation as the benefits of leaving these wastes at the Site are questionable. PTW should be removed for off-site disposal.
- For other Superfund sites in Region 2, the PTW has been removed from a site to the extent practicable, and then remaining site wastes are capped/contained etc. The following sites used this approach Cornell-Dubilier, Chemical Insecticide, Horseshoe Road, Vestron/Velsicol, White Chemical, Bayonne Barrel and Drum. USEPA must take this same approach for this Site.

Technologies that must be considered

- The PP essentially transforms the entire Site into a long term waste storage facility. Efforts to reduce the mass of wastes that will be entombed at the Site are not incorporated into the PP.
- The 1998 Record of Decision (EPA/ROD/R02-98/500 1998) for OU3 includes discussion of a "...stringy, tacky tar..." from Impoundments 4 & 5 that was successfully treated and removed from the Site under a "Fuel Blending/Recycling" program. The characteristics of those tars appear similar to the tars and organic wastes that the PP intends to address by stabilization/solidification. The PP is selecting a containment technology rather than an option that could destroy the wastes.
- The use of the previously successful fuel blending/recycling approach to management of the Site's complex organic wastes was not considered by FS. An explanation as to why a treatment methodology known to be successful with this Site's wastes was apparently not considered is required provided.
- **Off-site incineration of the organic wastes was not given serious consideration in the FS. This approach can assure those wastes will be addressed only one time. S/S is burdened with the requirement for perpetual car and significant long term O&M costs.**
- The Site has ready access to a major freight rail line and rail car transport to an off-site, permitted hazardous water incinerator (e.g., Waste Management in Emille, AL) is an alternative that requires detailed consideration. Yes, it could have initially more capital costs, but it would also have no long term O&M for those wastes.
- Technologies that destroy the wastes today rather than leave them for a future generation must be incorporated into the PP for the Site.

CHAPIN ENGINEERING
A PROFESSIONAL CORPORATION
"Experience Matters"

Memorandum

DATE: May 8, 2012
RE: Review & Comments on Proposed Plan & Feasibility Study for the American Cyanamid Superfund Site, Bridgewater, New Jersey

- The current PP essentially relies on a single technology that leaves the Site as a waste disposal area in perpetuity. Utilizing technologies that would destroy, rather than entomb wastes, can have the long term benefit of reducing the area of the site left as disposal and enhancing future reuse options. The PP should incorporate a combination of technologies.
- Low Temperature Thermal Desorption (LTTD) was part of alternative 7 as treatment for PTW requiring vapor control. LTTD is known to be effective for removing volatile organics; yet, was rejected under Long-Term Effectiveness because it "...has not demonstrated effectiveness for the full range of contaminants..." The LTTD did not target the "full range of contaminants", so an explanation is required. In addition, LTTD should be considered as it could reduce the mass of wastes entombed and area dedicated to waste disposal.

Community Impacts not Addressed

- The **PP represents** importation of approximately 960,000 tons of fill materials [computed using the FS unit weight of 1.6 tons per cubic yard]. This represents 48,000 truckloads [at 20 tons per load] into the Site, or **96,000 truck movements. There is no discussion at all concerning this activity and its impacts on Bridgewater and the neighboring communities.** We note there is limited access and the closeness of residential neighborhoods. This is a significant short terms effects factor that has not been addressed by the PP or the FS. Materials transport into the Site must be fully evaluated and to date it has not.
- The Site has ready access to active freight trackage, yet there is no consideration given in the FS for any use of rail for transport of materials into the site (or removal of wastes from the Site). **Rail transport could reduce the short term impacts and must be considered.** In addition, use of rail for off-site rail transport will also minimize the short term impacts of the cleanup.

Incomplete Cost Assessment

- The cost analysis provides a total annual operation and maintenance (O&M) cost for the groundwater treatment systems and the soil and multilayer caps for a 30 year period, but does not incorporate any costs for O&M of the capping systems beyond that point in time. The PP would create a waste entombment that requires perpetual O&M by Pfizer, the Responsible Party. The costs should be recast to reflect the Responsible Party's true obligation for the waste tomb that will be created by the PP.
- From a cost prospective, any projects capital costs (which can be defined with a good degree of certainty) and the long term O&M costs (which are projected and have a lesser degree of certainty) should be balanced. The classical choice is between spending today (capital costs) vs. spending tomorrow (O&M). For the 30 year period assumed by the PP, the total O&M is less than the projected capital costs; however, **this evaluation does not incorporate O&M for the entombed wastes beyond 30 years, and those costs should be considered in the evaluation of the PP.**
- **Pfizer's financial liability for the Site extends well beyond the 30 year cost estimate provided with the PP. What mechanism will USEPA use to assure that Pfizer continues to fund the project given the possibility they may no longer exist in the future as a company with assets?**

THOMAS J. GERMINARIO
Attorney-at-Law
154 Route 206
Chester, New Jersey 07930

TELEPHONE
(908) 879-0091

FACSIMILE
(908) 879-0079

March 6, 2012

VIA E-MAIL & REGULAR MAIL
Joseph Battipaglia
Remedial Project Manager
U.S. EPA
209 Broadway, 19th Floor
New York, NY 10007-1866

Re: Site-Wide Feasibility Study and Proposed Remedial Action Plan American Cyanamid Superfund Site

Dear Mr. Battipaglia:

On behalf of CRISIS, I have reviewed the Site-Wide Feasibility Study (the "SWFS") and the Proposed Remedial Action Plan for the American Cyanamid Superfund Site in Bridgewater, New Jersey, both dated February 2012, and this letter contains my analysis of these documents.

The SWFS addresses the remediation of Impoundments 3, 4, 5, 13, 17 and 24, as well as site-wide soils and groundwater. A separate Focused Feasibility Study is being prepared to address Impoundments 1 and 2. Impoundments 3, 4 and 5 are located in the Main Plant area within the flood control dike, while Impoundments 13, 17 and 24 are located in the floodplain between Cuckhold's Brook and the Raritan River. Impoundments 3, 4 and 5 were used for storage of organic tars and sludges from production processes, while Impoundments 13, 17 and 24 primarily comprise wastewater treatment sludges.

Consequently, Impoundments 3, 4 and 5 contain relatively high levels of volatile and semi-volatile organic contaminants (VOCs and SVOCs), with mean concentrations in the range of 10^3 to 10^4 ppb (mg/kg). Contaminants of concern in these impoundments include benzene, toluene, xylene, and naphthalene. Impoundments 13, 17 and 24, on the other hand, have mean concentrations of VOCs and SVOC mostly below 10^2 ppb. The Impoundment 3, 4 and 5 wastes comprise two layers: an upper tar-like layer, which becomes viscous at higher temperatures, and low permeability sludge layer. Due to their high toxicity and mobility, the upper 4-feet layers of Impoundments 3, 4 and 5 are classified as principal threat wastes. The potential of the lower sludge layers of these impoundments to be considered principal threat wastes will be investigated during the remedial design phase (SWFS, Vol. 1, pp. 30-31).

In addition to being highly toxic and mobile, the Impoundment 3, 4 and 5 wastes are quite heterogeneous – meaning that the wastes exhibit a wide range of variability as to the types and concentrations of contaminants. As noted in the SWFS (p. 16), this heterogeneity makes these wastes very difficult to handle and treat. Based on previous experience with similarly heterogeneous wastes (Impoundments 14 and 20), *ex-situ* treatment of this type of waste is apt to involve considerable uncertainties, extended timeframe and greater potential for fugitive air emissions. Therefore, it is my opinion that *in-situ* solidification/stabilization (s/s) to reduce contaminant mobility is potentially the best remedy for Impoundments 3, 4 and 5. In order to optimize the efficiency of the s/s process, I recommend that bench-scale testing be conducted during the remedial design phase to determine the most effective combination of amendments, stabilizing agents and geogrids.

Regarding Impoundments 13, 17 and 24, the material should be classified during the remedial design phase in accordance with the three classifications for site-wide soils, namely, those requiring: (i) direct contact control, (ii) vapor control, or (iii) movement control. The material thus classified would be relocated to the areas of the Main Plant designed for the appropriate level of control. Principal threat wastes, if any, located in these impoundments should be removed and consolidated in Impoundments 3, 4 and 5 for *in-situ* s/s treatment. The same should apply to any principal threat wastes, including tar blooms, located outside the impoundments.

With respect to site-wide groundwater, the SWFS (p. 67) outlines a series of recovery systems (trenches, wells and/or containment walls) to intercept overburden groundwater before it gets to the Raritan River and/or Cuckhold's Brook. It also addresses improvements in the bedrock groundwater collection system (Appendix H) and extension of bedrock pumping to the Lagoon 7 Area.

While the SWFS (p. 87) defers the determination of final disposition of the collected and treated groundwater to the remedial design phase, it identifies three potential options:

- Construction of an on-site water treatment facility with direct discharge to either surface water or groundwater under the requirements of an NJPDES permit
- Construction of an on-site pre-treatment system with discharge to SRVSA
- Straight discharge to SRVSA

Since the SRVSA currently does not monitor for VOCs and SVOCs in its effluent and has no discharge limits for these contaminants, the options involving SRVSA should be taken off the table until such monitoring and limits are in place, and the capability of achieving these limits has been demonstrated. If interim reliance on the SRVSA is necessary while on-site treatment alternatives are being developed, as indicated in the SWFS (p. 49), appropriate VOC/SVOC monitoring and discharge requirements should be imposed as soon as possible. These stipulations should be included in the Record of Decision (ROD) for this phase of the site remediation.

Based on the foregoing considerations, Alternatives 4A and 5 are worthy of further consideration. Alternatives 7 and 11 rely on untested treatment techniques and have extended implementation periods upwards of 20 years. Alternative 5 differs from 4A principally by extending *in situ* s/s treatment beyond Impoundments 3, 4 and 5, and materials consolidated therein, to encompass all areas of the Main Plant subject to vapor and/or movement control. Alternative 4A addresses those areas with multi-layered caps. But the extension of s/s treatment in Alternative 5 to a much larger area and variety of contaminants raises issues of effectiveness and doubles the implementation timeframe to 20 years, as compared to 10 years for Alternative 4A.

Since the incremental environmental benefits of Alternative 5 as compared to 4A appear speculative, at best, they do not justify the very long implementation period required. Consequently, the bottom-line assessment of 4A as the preferred alternative appears reasonable and justified, subject to the recommendations made herein and clarification of the groundwater treatment issues as discussed above. In particular, CRISIS should request that the following issues be addressed in the ROD:

- Long-term groundwater treatment should rely on an on-site system designed specifically for the site's contaminants, NOT on the SRVSA's municipal wastewater treatment system.
- Interim groundwater treatment at the SRVSA should be subject to enforceable effluent limitations for VOCs And SVOCs.
- Materials in the floodplain requiring direct contact, vapor or movement control should be relocated to the Main Plant area and covered by the appropriate engineered multi-layered cap.
- All principal threat wastes should be consolidated in Impoundments 3,4 and 5 for *in-situ* s/s treatment.
- Bench-scale testing should be conducted during the remedial design phase to determine the most effective combination of amendments, stabilizing agents and geogrids to be used in the *in-situ* s/s process.

CRISIS thanks the U.S. EPA for its consideration of our recommendations regarding the Proposed Remedial Action Plan and the Site-Wide Feasibility Study.

Very truly yours,

Thomas J. Germinario

THOMAS J. GERMINARIO

cc: Walt Sodie, CRISIS

R2-0007886

public comments
Kelly A. Kemmerle to: Joseph Battipaglia 03/19/2012 10:32 AM

History: This message has been forwarded.

1 attachment

american cyanamid testimony.pdf

Hi Joseph,

My name is Kelly Kemmerle and I have attached my public testimony for the American Cyanamid Superfund Site. I attended the public meeting in Bridgewater but did not get a chance to speak. I really appreciate you taking the time to read my comments on the Proposed Plan. Please feel free to contact me at any time if you have any questions.

Thank you so much,
Kelly Kemmerle

EWA

Kelly Kemmerle, Conservation Intern
Edison Wetlands Association
Statement to EPA at Public Hearing
March 8, 2012

My name is Kelly Kemmerle and I a senior at Rutgers University studying in Environmental Policy and I am also a Conservation Intern for the Edison Wetlands Association and I am writing today to voice my opinion about the Proposed Plan to address the American Cyanamid Superfund Site. I attended the public meeting but I did not get a chance to speak. I have faith that both written and spoken testimonies will be considered during the decision making process.

After reviewing the Proposed Plan by the EPA & Pfizer I have some concerns.
Option 4A of the plan does not fully address the problems at the site. Any additional impervious surface on the site will increase flooding in surrounding towns. I have spoken with many residents in Bound Brook and Bridgewater who are completely fed up with the flooding. If you talk to mostly anyone from these towns they all have flood stories. I spoke with one woman in Bound Brook who is actually moving out of the community because the flooding is so bad. She has been trying to leave the neighborhood since the Hurricane Irene floods but was unable to get out of her lease and is finally leaving next month. She was extremely frustrated with the community. These people do not need anything that could possibly make the flooding situation worse.

Pfizer should have to implement the most feasible option that is best for the community, which is Option 7 because it actually cleans up the site. Public health & what is best for the community should be the number one priority of this plan. Engineered designs can not last forever and this cap will eventually wear down and fail. When this happens, what will happen to future generations? It would be extremely wasteful to have to go back and re visit the site in the future when we could just clean it up right now. Option 7 is the best choice for the people of these towns and their best interest should be the number one priority.

Thank you for listening to my concerns and I appreciate that the period for public comment has been extended since I did not get to speak at the meeting. Thanks again for your time.

Edison Wetlands Association, Inc. ♦ 206 Tyler Road ♦ Edison, New Jersey 08820
Telephone 732-321-1300 ♦ Fax 732-372-7866 ♦ www.EdisonWetlands.org

SOMERSET COUNTY
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UNITED STATES CHAMBER OF COMMERCE ACCREDITED ★ ★ ★ ★

EPA Hearing on American Cyanamid Superfund Site

Good evening. My name is Michael Kerwin and I am the President/CEO of the Somerset County Business Partnership. The Business Partnership serves as Somerset County's regional Chamber of Commerce and we also partner with the Somerset County Freeholders to provide economic development services to our community.

The mission of the Business Partnership is to lead the business community to a prosperous and sustainable future. We take the sustainability part of our mission very seriously. The Business Partnership supports sustainable economic growth that creates a foundation for job creation and economic prosperity. Business decisions need to be based on a careful balance of the triple bottom line: environment, economy and community. Decisions must be based on reason, not emotion.

We have a Sustainable Somerset committee, under the leadership of Chairman Ed Seliga, that meets on a regular basis and delivers a program of work that benefits our members. Examples of these programs include the creation of a green design toolkit for the design and construction of buildings in the public sector. This toolkit was the first of its kind in New Jersey and has been followed in the design of many new facilities. The Business Partnership works with closely with the Somerset County Energy Council to support energy efficient programs in Somerset County. We also work closely with the US Green Building Council, New Jersey chapter, to provide training in LEED accreditation.

The Business Partnership's Sustainable Somerset reviewed the proposed plan to clean up the American Cyanamid site on ~~February 14~~, Jan 10 2012. The committee offers the following comments:

- We appreciate and support Pfizer's efforts to, at long last, clean up this site. The Business Partnership, and our predecessor organization, has been supporting the cleanup of the Cyanamid for over 20 years. We have seen more action towards achieving the goal of cleaning up the site since Pfizer assumed control than there was in the prior decades. We want to see this momentum continue. We see a significant risk to the community if the project is further delayed. The site has been investigated since 1981. It is time for implementation.

- The Somerset County Business Partnership supports the implementation of remedial alternative 4A as summarized in the EDA report. While we do not present ourselves as experts in the area of environmental cleanup, the proposed plan appears to us as a reasonable approach to cleaning up the site. We note that no matter what option is considered, the site will require ongoing remediation for the foreseeable future.

Mail: P.O. Box 833, Somerville, New Jersey 08876-0833 • Location: 360 Grove Street, Bridgewater, New Jersey 08807-2849
Phone: 908.218.4300 • Fax: 908.722.7823 • Email: info@SCBP.org
Website: www.SCBP.org

Therefore, we are fortunate that we have a company with the resources of Pfizer to post a guaranty that this ongoing remediation will occur. We do not see the environmental benefit of the more expensive options, but do see the considerable risk to the cleanup workers and the neighboring community if the contaminated soil had to be exposed to the environment and transported off site.

- We recognize that the proposed plan is still conceptual and that, if approved, many details will need to be resolved and addressed to make sure that the community is protected. The Business Partnership supports the continued involvement of CRISIS as the community watchdog to make sure that their concerns about the implementation of the alternative 4A plan are addressed.

- While our primary concern is to see that the American Cyanamid site proceeds to cleanup within a reasonable time in order to protect the community, we also support the plans to give the community greater access to the Raritan River. In addition, there is a portion of the site adjacent to the Bridgewater train station that would provide an attractive site for redevelopment. We support the plan to open this area for smart development at some time in the future.

Comments to EPA proposal for American Cyanamid site
[redacted]
to:
Joseph Battipaglia
04/06/2012 12:11 PM
Hide Details
From: [redacted]

To: Joseph Battipaglia/R2/USEPA/US@EPA

Hello,

Below are my comments to the proposal

I'm not a scientist or an expert on toxic chemicals and how to treat their mis-use, but as a member of the Bridgewater Economic Committee I did attend a presentation by the Pfizer team where they explained the EPA proposal and how Pfizer would implement it as well as manage the site in the future. I also toured the American Cyanamid site.

All I can say is that Pfizer appears to be anxious to spend a lot of money to make this site so it is a "non- issue" environmentally, and a non-issue for their company. At the same time they propose to make much of the site suitable for "open space" parklands as well as a small portion which could be developed for commercial use.

I though it was particularly important that Pfizer did not envision turning the property over to some other entity by "giving it" to the town or to the county. Rather they want to continue to own it and keep it within their control in order to personally make certain the standards agreed upon will continue to be met for the foreseeable future.

This problem has polluted our river and our land, especially the wetlands feeding into the river and has been negatively impacting the environment for way too long. There is a plan that will get the job done, sooner than later.

For these reasons I and my wife support the plan.

[redacted]

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UNITED STATES CHAMBER OF COMMERCE
ACCREDITED

Sustainable Somerset Committee
Comments Regarding American Cyanamid Superfund Site

As presented by Edward M. Seliga, Committee Chairman and SCBP Board Member

ES

May 14, 2012

U.S. EPA – Region 2
ATTN: Joseph Battipaglia
290 Broadway, 19th Floor
New York, NY 10007-1866
(battipaglia.joseph@epa.gov)

The Sustainable Somerset Committee of the Somerset County Business Partnership and its predecessor, the EHS Committee, have been involved with the assessment and proposed remediation of this property for approximately 20 years. Our committee's participation included public meetings and site tours of the property in the 1992 timeframe, literally 20 years ago.

Our committee strongly supports **Remedial Alternative 4A** as the appropriate action plan for clean-up and reuse of this site. We would summarize our position as "Clean it up, put it to use."

We are confident that Alternative 4A is protective of human health and protective of the environment as well. While the expenditure of funds is certainly substantial, we appreciate that this approach is cost-effective. Containing the remaining contaminated materials on-site and isolating them from contact with the public and with the environment is the most appropriate strategy. We would prefer that the remedial process not create risks of additional exposures through large-scale off-site transport of contaminated materials.

We emphasize that elimination of contamination of the Raritan River must remain a top priority throughout the management of the property. We support the role of the community group CRISIS as the best representative of local community interests.

Additionally, we would prefer that some portions of the property be designated for return to beneficial use as soon as possible. While this is obviously not possible in the near term for the site as a whole, we remain optimistic that a phased approach would allow partial reuse (for recreational or business purposes) within the not too distant future.

American Cyanamid Superfund Site - SCBP Sustainable Somerset Comments
Ed Seliga
to:
Joseph Battipaglia
05/14/2012 06:32 PM
Cc:
"Mike Kerwin (mkerwin@scbp.org)", "Michael Taylor (taylor@vitanuova.net)"
Hide Details
From: Ed Seliga <ed@advancedsolarproducts.com>

To: Joseph Battipaglia/R2/USEPA/US@EPA

Cc: "Mike Kerwin (mkerwin@scbp.org)" <mkerwin@scbp.org>, "Michael Taylor (taylor@vitanuova.net)" <taylor@vitanuova.net>

History: This message has been forwarded.

1 Attachment

SCBP Sustainable Somerset Comments - USEPA - American Cyanamid site.PDF

Dear Mr. Battipaglia:

I am attaching the comments of the Sustainable Somerset Committee of the Somerset County Business Partnership regarding the American Cyanamid Superfund Site in Bridgewater, NJ.

These comments reflect the statement I made at the March 8, 2012 public meeting in Bridgewater.

Please add my name to any public notification list for future meetings.

Thank you for your assistance with moving this project toward resolution.

Sincerely,

Edward M. Seliga
Chairman, Sustainable Somerset Committee - SCBP
Vice President / Chief Operating Officer
Advanced Solar Products, Inc.
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RUTGERS
Edward J. Bloustein School
of Planning and Public Policy

National Center for Neighborhood &
Brownfields Redevelopment
Rutgers, The State University of New Jersey
33 Livingston Avenue
New Brunswick, NJ 08901

May 15, 2012

Joseph Battipaglia, Remedial Project Manager
U.S. Environmental Protection Agency, Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

Dear Mr. Battipaglia,

The following are my comments on the Feasibility Study for the American Cyanamid Site in Somerset County, New Jersey. While this letter does not represent the Raritan River Collaborative, I write as the convenor of the effort, and through that role, with knowledge of the region, the need for remediation and long-term ecological reconstruction throughout the Raritan River region, and remediation on this site in particular.

The Raritan River Collaborative is an umbrella organization created through Rutgers University to bring concerned parties together for the health and welfare of the Raritan River, its tributaries and Raritan Bay. You will hear from various members of the group in response to the call for public comment. We collectively encourage EPA to continue to pay close attention to this site, to ensure there are no missteps in the remediation process and no additional damage to the resource during the remediation phase. Ideally, one would like to see all contaminants removed, but I recognize the need for progress and advocate an active continued dialogue with all interested parties to ensure that this site sees a continual reduction in contaminants and enjoys a restored ecosystem, which, in its current state so dramatically affects the quality of the Raritan River and impacts the viability of investment in the region. This remediation will go far in completing a larger social contract whereby the residents of this region will receive a clean site and safety from exposure into the future.

In my review of the Feasibility Study, I sought to see five concerns addressed:

(1) Restoration of the natural areas to acceptable habitat condition
(2) Curtailment of potential seepages or other flood-related distribution of contaminants from the site into the Raritan River
(3) Curtailment of any aerosolized (vapor) impacts to the region
(4) Long term remediation and aggressive protection of the river system from impounded or capped areas
(5) Community compensation for losses of the resource over the years the site has not been remediated

Given the alternatives, there are clear benefits to several options, but clearly the most reasonable is Alternative 4A. And yet, there are other issues this Alternative did not clarify so I raise those concerns in hopes that USEPA will review with the remediating parties and arrive at an approach that maximizes the protection of the resource and the surrounding community and looks ahead to how this can remediation can maximize the protection and restoration goals outlined.

R2-0007896

Point one (1) is acknowledged in the executive summary which states the "remedial program will also be designed to allow for concurrent planning and implementation of prospective Natural Resource Damage (NRD) restoration measures."

Point two (2), regarding potential seepages is of particular concern as affects the use of slurry walls. It is key that there be a means of testing the efficacy of the slurry walls and reporting on that to the community along with other data on a quarterly basis. In addition, this can also affect the river directly and thus should require a report of quarterly tests of the water quality with satisfactory explanation for any levels that exceed the New Jersey Surface Water Quality Standards – and description of responses to arrest any discharges.

Point three (3) focuses on aerosolized/vapor exposure and it is essential that the vapors from all areas be measured *and reported to anyone interested* on a regular basis. It is recommended that the remediating party secure the contact information (email or other) for all interested parties, and that EPA describe a reasonable (quarterly) basis by which reports are provided.

Point four (4) addresses Long term remediation and aggressive protection of the river system from impounded or capped areas. I understand that the remediating party wishes to consider areas of the Site not yet remediated as a single operable unit (OU) – with the removal of Impoundments 1 and 2 from the Site-wide FS – to be addressed in a separate Focused feasibility study some time in the future.

This (which largely includes "Group 3") is of major concern and while the complexity of those impoundments are of such significance to require separate consideration, an articulated strategy to address those impoundments are critical to the comfort of the community – to the protection of the environment and needs to be outlined now.

Point five (5) is also addressed in the executive summary which states the "remedial program will also be designed to allow for concurrent planning and implementation of prospective Natural Resource Damage (NRD) restoration measures." EPA needs to require that the remediating parties also provide quarterly reports on the progress of efforts to address this and how success is being measured.

In sum it is critical that the remediating parties proactively provide ongoing and timely reports to the community that demonstrate both the protective nature of the remediation process and actual sampling results as described above. This needs to be provided in "plain language" without undue ambiguity and with opportunities for further information clearly available.

I thank you for the opportunity to respond and look forward to clear and measurable progress on the restoration of this site and the value such restoration will add to the River.

Sincerely yours,

Judith A. Shaw

Judith A. Shaw, Ph.D., PP/AICP

Project Director
The Sustainable Raritan River Initiative

R2-0007898

EPA Proposed Plan - American Cyanamid
bill_wolfe
to:
Joseph Battipaglia
05/14/2012 01:11 PM
Hide Details
From: [redacted]

To: Joseph Battipaglia/R2/USEPA/US@EPA

U.S. EPA – Region 2
ATTN: Joseph Battipaglia
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Comments on American Cyanamid - EPA Proposed Plan

Mr. Battipaglia:

Please accept the below comments on EPA's proposed cleanup plan for the American Cyanamid Superfund site.

Comments are submitted on behalf of NJ Public Employees for Environmental Responsibility (NJ PEER).
NJ PEER testified at the public hearing and joined other comments submitted by Edison Wetlands Association. However, we would like to make additional comments noted below.

1. Role of the National Remedy Review Board

We are concerned by the role of the Board, given their effective development of the preferred remedial alternative, as EPA states:

"On March 16, 2010, EPA presented the proposed alternatives of the Comprehensive Site-wide FS to EPA's National Remedy Review Board (NRRB) to evaluate the appropriate remedy for the remainder of the Site. As a result of this review, an additional alternative was developed in response to the NRRB's advisory recommendations. **The preferred remedy presented in this Proposed Plan reflects this new alternative and NRRB input." (@ page 7)**

We ask that the Board's role be clarified in response to comments so that the public may better understand the scientific and regulatory bases for EPA's proposed plan.

Specifically, we'd like EPA to outline the membership, transparency, accountability, policies, and decison-making procedures of the Board.

How are Board reviews triggered? How are Board members selected? What are the qualifications and affiliations of Board members? What ethical standards govern the Board? How are Board recommendations developed? How does the Board deliberate? Does the Board conduct peer review? Is the Board subject to the Federal Advisory Committee Act?

How could the Board first engage on March 16, 2010 and develop the selected alternative proposed on February 2012, after EPA and NJ DEP have been involved at the site for almost 30 years? Do Board experts know something EPA Region 2 staff do not? Are Board recommendations subject to the same scientific and regulatory standards that EPA Region 2 are? What explains the Board's deviation from EPA R2?

2. Clean Water Act compliance and ARAR issues

Superfund mandates the consideration of ARAR's and compliance with the Clean Water Act.

The proposed alternative fails to mandate compliance with all applicable requirements for all discharges from the site (and resulting from the proposed plan) to the Raritan River.

Specifically, EPA ha failed to demonstrate how all disc hares will comply with the federal Clean Water Act in the form of EPA delegated NJ Surface water quality standards and NJPDES permit requirements, in this case, "water quality based effluent limits" (WQBEL's) and industrial storm water requirements.

This is an key Clean Water Act compliance issue, as no CWA permit may be issued that would violate a state ambient water quality standard.

At the public hearing, consultants for the local sewer authority raised this issue, as well as the failure of the NJ DEP NJPDES GP to include effluent limitations for all parameters discharged, as required by NJ SWQS and NJPDES regulations, and the Clean Water Act.

So, we should note that, and say that any discharge to the rive comply with NJ SWQS and NJPDES WQBEL effluent limits (at point of discharge, with no mixing zone).

3. Site wide ecological assessment

The scope of the ecological screening and assessment was far too narrow (spatially, ecologically, and in terms of all discharges). According to the EPA plan:

"Ecological Risk Assessments

Ecological risks at the Site were addressed in two documents: the BEA approved by NJDEP and EPA in 1992, and the BERA in 2005. In the Qualitative Ecological Assessment section of the BEA, the results of a site-wide habitat survey, as well as evidence from direct field observations, were compared to the Natural HeritageData Base (NJDEP, 1991). The assessment indicated that, with the exception of the great blue heron, the on-site habitat does not support threatened or endangered species. Impoundments 13, 17, and 24 were not included in either the 1992 BEA or the 2005 BERA because the contents of these impoundments were scheduled to be remediated under the OU1 and

OU2 RODs.

The most significant potential exposure pathway identified in the BEA involves aquatic biota exposure to Raritan River water. Site groundwater discharge mass loading calculations suggest that exposure to concentrations of Site chemicals of interest resulting from groundwater discharge is unlikely to affect the health and diversity of aquatic biota in the Raritan River." (@ page 11).

It appears that the 1992 BEA and 2005 BERA were limited to on-site habitat and did not consider all ecological values and functions.

The scope of the assessment was not site-wide and did not consider offsite impacts to sediments and biota, including downriver and estuarine impacts.

The ecological receptors include species other that "threatened and endangered".

In addition to groundwater discharges, the Raritan River is impacted by surface discharges from the site (i.e. storm water runoff, point source discharges, and failure of impoundment/seepage/breakout. These surface water off site releases were not assessed, including impacts associated with flood events.

These are just preliminary structural flaws in the ecological assessment, based only on review of the proposed plan. We're confident that detailed review of the 1992 BEA and 2005 BERA would disclose additional specific methodological, data, and findings concerns that warrant current competent scientific review and regulatory oversight.

4. Formal consultation with US Fish and Wildlife Service

We request that EPA formally consult with USFWS on the ecological bases of the proposed cleanup plan.

Formal consultation should include de novo site-wide ecological impact assessment (including off-site and downriver impacts) in order to assess natural resource injuries and require mitigation, restoration, and compensation for all natural resource injuries, as required by law.

5. EPA Inspector General Audit Fndings Must be addressed

EPA oversight at the American Cyanamid site was influenced by the following EPA Inspector General Evaluation Report:

Improved Controls Would Reduce Superfund Backlogs
Report No. 08-P-0169 June 2, 2008
http://www.epa.gov/oig/reports/2008/20080602-08-P-0169.pdf

That Report implicitly and explicitly criticizes both NJ DEP and EPA oversight at the site. The EPA IG found that DEP and EPA caused unnecessary delays in cleanup and concluded that timely and protective actions war not taken on the cleanup.

Delays obviously increased on site and offsite migration of contaminants and exacerbated risks and impacts from the site.

The EPA IG Report found:

"We recommend that the Region 2 Administrator direct staff to coordinate with NJDEP officials the clean-up of specified sites more than 20 years old. **Region 2 should assume lead status from New Jersey** for those sites where both agencies agree it would be beneficial and develop Letters of Agreement for those sites. We also recommend that the Assistant Administrator for Solid Waste and Emergency Response, where appropriate, improve site profiles in EPA's public Superfund Website to accurately depict EPA and State actions taken to protect human health and the environment. In its response to the draft report, EPA agreed with all of our recommendations and its **proposed corrective actions should address our recommendations.** However, the recommendations will remain open until the agreed-upon actions are completed."

The Report's findings are relevant to and therefor should be discussed and applied to the proposed cleanup plan. Because the proposed EPA plan does not mention this Report, it is impossible to determine if the IG's finding's and deficiencies have been addressed and corrective actions taken to remedy deficiencies.

Sincerely,

Bill Wolfe, Director
NJ PEER
PO Box 112
Ringoes, NJ 08551

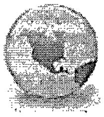
sunnyb21 to: Joseph Battipaglia, Cecilia Echols 03/08/2012 08:26 PM
Please respond to [redacted]

Hi, my name is [redacted], my address is [redacted]. I would like to make a plea to you and the rest of this panel and our elected officials to please consider a full remediation for the American Cyanamid Superfund site. As you know the 500 acre contaminated site sits adjacent to the Rahway River which is a drinking source for many residents in the region. Even if there's a little bit of flooding this area gets covered up resulting in the spread of toxins. If there is such a plan that can completely and thoroughly clean up the area, I think the EPA has an obligation to the people to endorse that plan. I hope the EPA's agenda represents the communities best interest and not the interest of saving as much money as possible for Pfizer. It is sad that I have to point this out to the ENNVIRONMENTAL PROTECTION AGENCY, however your agency has a pretty suspicious record when it comes to protecting big corporations; case in point being DuPont site in Pompton Lakes. Dupont has a former EPA administrator(William K. Reilly) sitting on their board of directors. You can't expect any of us to believe that this has 0% impact on how much you force them to clean up their site or how you shape your feasibility studies. So let's be real here, it is now 2012, and if the tea party and occupy wall street movements are any indication, we as a people will not stand for this sort of behavior anymore. We the public are not extremists, we just want you to work for US- living, breathing, compassionate people, not fake persons called corporations. Please work with us and take the time to find the best solution that completely remediates the site. It is also critical that we consider the long term effectiveness of any plan. Also, please consider the issue of flooding as you make your endorsement. I do not believe you can put a price cap on efforts to clean up the environment and i believe this should also be the stance of the EPA. Which alternative do you believe is the most comprehensive and thorough independent of cost? Do you think it is appropriate to pick a plan just solely based on cost and the quickest time that redevelopment can occur? This sort of logic seems to only point towards an alternative that is not the most thorough, what do you think?

If you could answer my questions I would greatly appreciate it. Let me be clear I do not hold you specifically responsible for the problem that is the revolving door/corruption that has been going on between our government and big corporations however you can be a huge part in the solution.

Thank you for your consideration,

[redacted]



Pfizer
[redacted]
to:
Joseph Battipaglia
04/10/2012 01:24 PM
Hide Details
From: [redacted] [redacted]

To: Joseph Battipaglia/R2/USEPA/US@EPA

Please respond to [redacted]

Dear Sir,
Hello, my name is [redacted], and I am a Bridgewater, NJ resident.
I am in the water treatment operations business and I was wondering if you could give me some info of the status of the groundwater remediation facility at Pfizer, whether it is operating or when it will start up, and also, who is the contract operations company doing the work.
I am an N-4 Industrial License holder, and this would be a great spot to work.
Thanks for any info you may provide or info of other sites that may need operators.

Thanks again
[redacted]

[redacted]

May 14th, 2012

U.S. EPA Att'n Mr. Joseph Battipaglia,
Remedial Project Manager,
290 Broadway, 19th Floor,
New York, NY 10007-1866

Dear Mr. Battipaglia,

I attended the Public Hearing on the American Cyanamid Superfund site March 8th in Bridgewater and heard the presentation and Q+A. Have also reviewed the various plans.

I was totally shocked by the pollutants leaching into the Raritan for the past many years. I am concerned about the possible impact during large flood events on the D+R Canal, relatively adjacent to this site. Hopefully this is not a problem, as it is my primary drinking water source.

Restoring the Raritan is very important for fish, birds, animals and for humans boating safety. As it was agreed at the hearing that the whole site is in the current flood plain, any solution which leaves contaminants in the soil, even if buried, is no solution to the problem, only temporary at best. Such a solution would merely leave the final cure to later generations, which is unwise, unethical and maybe immoral.

The only satisfactory solution to the problems on this site is either removal of all contaminants from the site for treatment elsewhere, or treatment on-site where possible to remove the contaminants or a combination of both approaches.

We have a similar problem on a smaller scale in Milltown Middlesex County, and we are determined not to allow capping to be used there, particularly as it is a drinking water supply. The Raritan site has been allowed, for whatever reasons, to pollute the Raritan and surrounding area for decades. This must be remedied starting very soon.

I am personally involved with protection of the environment in the Lawrence Brook Watershed and in the Borough of Milltown. I will be pleased to assist in whatever way I am able.

Thank you.

Sincerely,

[redacted]

echols.cecilia@epa.gov
[redacted]
to:
Joseph Battipaglia
02/22/2012 03:34 PM
Hide Details
From: [redacted]

To: Joseph Battipaglia/R2/USEPA/US@EPA

History: This message has been forwarded.

1 Attachment

20120223030550948.pdf

Dear Mr. Battipaglia,

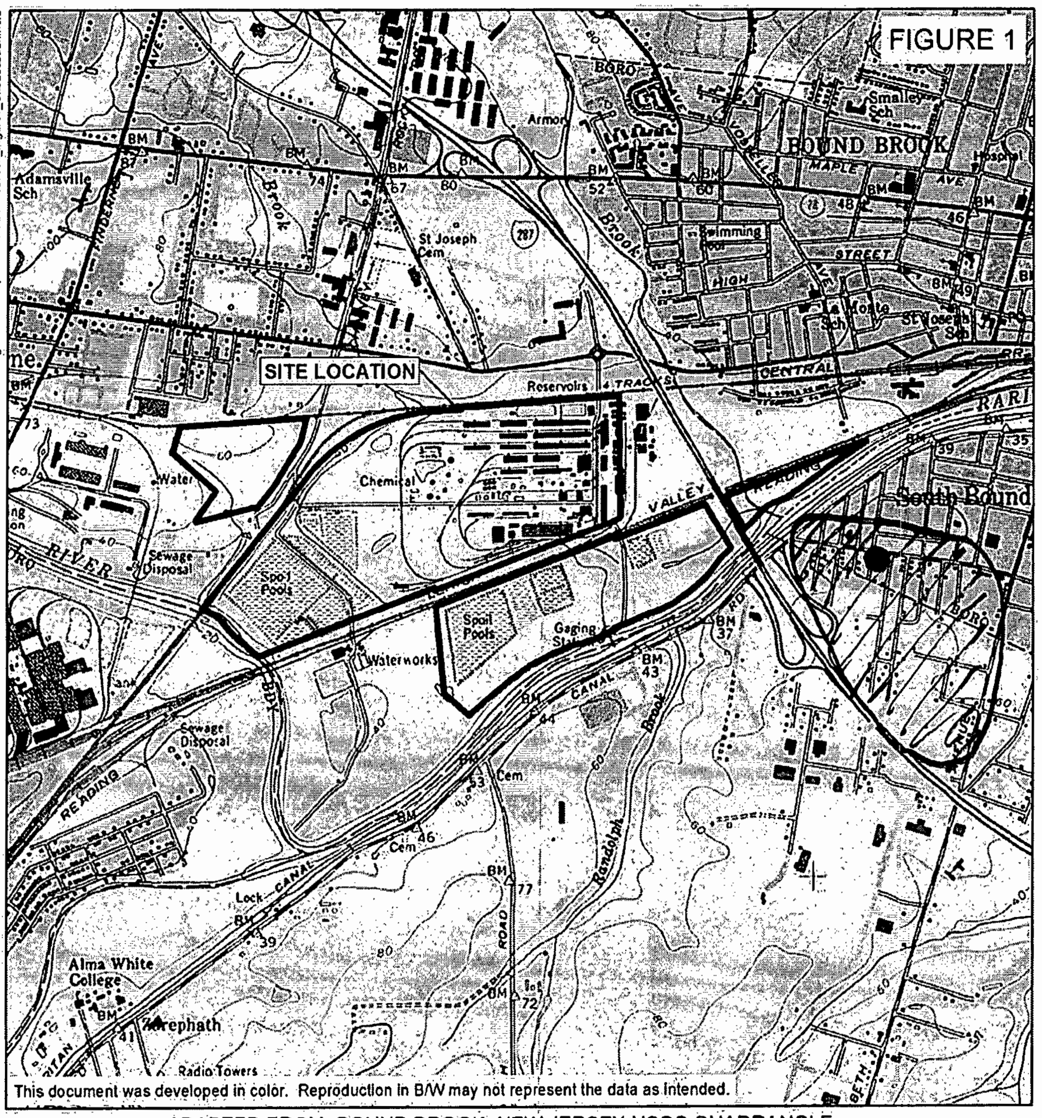
I read a recent article that the EPA was encouraging public comment on the American Cyanamid Superfund site and I would like to find out if this site may have contaminated the wells in our neigborhood. My home is northeast of the site about 2000 ' from the site boundry and we have well water, so do many of my neigbors. we have been in our home for 25 years, but some of our neigbors have been there much longer. I am concerned that the contamination may have migrated from the site over this period of time when pumps have failed, flooding has occured or through the shale. Could the EPA as part of this proposed clean up test the wells in our neigborhood to assure us that the contamination has not migrated to our wells? I marked our location as a dot on the site plan from your report and crosshatched the approx. neigborhood that has well water for your information.

Thank you, [redacted]

[redacted]

PATH: I:\Pfizer.4529\STDS\GIS\Figures\FS\ProposedPlanBoundBrook_Figure1_SiteLocation.mxd

PLOT DATE: 12/12/2011 DRK



ADAPTED FROM: BOUND BROOK, NEW JERSEY USGS QUADRANGLE

MAP LOCATION

WYETH HOLDINGS CORPORATION
AMERICAN CYANAMID
SUPERFUND SITE
SITE-WIDE FEASIBILITY STUDY

N

SITE LOCATION

0 | 1,000 | 2,000 | 4,000 | 6,000 | 8,000

Feet

DECEMBER 2011
4529/47194

1:24,000

O'BRIEN & GERE

R2-0007908

RE: echols.cecilia@epa.gov
[redacted]
to:
Joseph Battipaglia
04/16/2012 10:34 PM
Cc:
echoes.cecilia
Hide Details
From: [redacted]

To: Joseph Battipaglia/R2/USEPA/US@EPA

Cc: <echoes.cecilia@epa.gov>

History: This message has been replied to and forwarded.

The site is not north of us, it is to the southwest of our home, within 2000'. The problem is that our home is located northeast of the site, which is also the direction of flow of contamination during flooding. Can I get a copy of the water testing in my neighborhood, with the location from which the test was taken. I hope you can appreciate my concerns, there are many homes in the area just north of Rt 287, east of the Raritan river with wells (the section of Franklin Township divided by Rt.287 on one side and surrounded by the Raritan River on the other 3 sides) that have well water and children. I believe it would be prudent and a small cost to the EPA to test some of the homes wells in our area. In the last flood the water from the Cyanamide site was completely flooded which extended across the canal, canal road and closed the 287 entry/exit ramp due to flooding east of the site and within a few hundred feet of our home. Also I have read that that the some or all the pumps around the site have been shut down on many occasions due to various causes.
Thank you for your response and further consideration in this matter.
[redacted]

american cyanamid superfund

[redacted] to: Joseph Battipaglia, Cecilia Echols 03/23/2012 11:33 AM

History: This message has been forwarded.

Dear Mr. Joseph Battipaglia and Ms. Cecilia Echols,

I have some questions regarding the American Cyanamid Superfund Site and I am hoping that you will be able to shed some light on it for me. I have been working at the Somerset Patriots Ballpark for 8+ years, spending 40+ hours a week at the site for 6 years and for the past two years 24+ hours. I understand through reading material published through the EPA, the site in which the Ballpark was built used to be considered Superfund but was unclassified as this in 1998. What tests were done to determine that it was safe for people to work at that site? Was remediation done at the site?

Also, this area floods frequently, the lastest being with Hurricane Irene in August 2011. Has the soil and water been tested for safety since then?

Has the air inside the Ballpark offices and inside the Somerset Medical Center Sports Performance and Rehabilitation Center been tested for vapor intrusion?

Does frequent handwashing/ showering at the ballpark pose any risk to human health?

Are there any long term exposure concerns for those who work at the Ballpark?

I greatly appreciate your time in answering my questions. If you cannot answer these questions for me, can you please put me into contact with someone who can?

Respectfully,

[redacted]

Fw: american cyanamid supferfund
Melissa Dimas to: Joseph Battipaglia 04/11/2012 08:28 AM

History: This message has been replied to and forwarded.

Could you answer the question about residential vs. commercial?

Melissa Dimas
International Affairs Program Manager and Community Liaison
Environmental Protection Agency-Region 2
dimas.melissa@epa.gov
Phone:212-637-3677
----- Forwarded by Melissa Dimas/R2/USEPA/US on 04/11/2012 08:25 AM -----

From: [redacted]
To: Melissa Dimas/R2/USEPA/US@EPA
Date: 04/11/2012 06:51 AM
Subject: american cyanamid supferfund

Hi Melissa
I did have one other question about the American Cyanamid Superfund Site. I know that the "Hill Property" was zoned for commercial, but given the levels of contaminants that were most recently tested, say after the Hurricane 8/2011, are the levels low enough to be zoned as residential?
Thanks again for all of your help,
[redacted]

May 8, 2012

Joseph Battipaglia
Remedial Project Manager
United States Environmental Protection Agency
290 Broadway, 19th Floor
New York, New York 10007-1866
Email: battipaglia.joseph@epa.gov

Dear Mr. Battipaglia,

Following are the public comments of Steve Kalafer, Chairman of the Somerset Patriots, with respect to the Proposed Plan for the American Cyanamid Superfund Site in the Township of Bridgewater, Somerset County, New Jersey.

Overview

The Somerset Patriots provide affordable family entertainment, and have, for the past 15 years, been the premier community-gathering place in Central New Jersey. With over 5,300 fans per game, an average of 375,000 fans per season, and close to 5,000,000 fans in their history, the Somerset Patriots have proven to be a model of consistency in being a destination site for families, businesses, and community organizations.

Economic Impact

Since 1999, upon completion of what is now TD Bank Ballpark, the Somerset Patriots have been an integral part of the economy of Bridgewater Township and Somerset County. In addition to the 20 full-time staff members that are employed by the Somerset Patriots, there are over 200 seasonal employees and local vendors that work the season at the ballpark. The Somerset Patriots provide an anchor business that ultimately benefits other businesses from people coming into the area to enjoy games and ballpark events. The franchise spends an average of over $2,200,000 per year to over 240 vendors who are located in over 100 different communities throughout New Jersey.

Corporate Citizenship

The Corporate Citizenship and Philanthropy of the team, its players, vendors and supporters has been exemplary, and has provided significant support to a wide range of charitable and community organizations. The Somerset Patriots' mission extends well beyond the ballpark, as we strive to be a strong positive force in our community and be the very best neighbors possible. The Somerset Patriots have helped raise hundreds of thousands of dollars each season for charities throughout the area and have raised millions of dollars for charities since opening the ballpark in 1999. At every game, there are fundraisers and awareness events being held for non-profit organizations or charities. Groups that have utilized the ballpark for these events range from national organizations such as the National MS Society, American Diabetes Association, Special Olympics, American Cancer Society, American Heart Association, to more local non-profits such as Somerset Medical Center Foundation, Operation Shoebox New Jersey, YMCA, and The Beez Foundation. The Somerset Patriots host special events for non-profit organizations at the ballpark, including the American Diabetes Association's Step Out Walk To Fight Diabetes and Operation Shoebox New Jersey packing events to support our troops. The team has created the Somerset Patriots Children's Educational and Sportsmanship Foundation to help charities the team supports. Events that help raise money for the foundation consist of an annual golf outing, a 5K run, and open player tryouts. Organizations such as Operation Shoebox New Jersey, American Diabetes Association, National MS Society, HCMAP, Somerset Council, and The Beez Foundation have benefitted substantially from these events over the past ten years.

Quality of Life

Since 1999, upon completion of what is now the TD Bank Ballpark, the Somerset Patriots and TD Bank Ballpark itself has created an essential element of the community's quality of life that is unmatched and is an integral part of Bridgewater Township and Somerset County. The ballpark provides a family-friendly and safe environment for those in attendance. Ticket admission prices and concessions for the Somerset Patriots ballgames are affordable and provide families with a viable and enjoyable way to enjoy sporting events. The ballpark offers a convenient, affordable, and safe parking facility for families who attend the games. It is a true gathering place for the members of the community – not only for residents of Bridgewater, but for Somerset County in general.

Conditions for Remediation

The Somerset Patriots support an expeditious and environmentally appropriate remediation of the American Cyanamid Site and want assurance from the USEPA, NJDEP and Pfizer that all activities in support of the remediation will be conducted in a manner that does not adversely affect, interfere with, or obstruct the ability of the Somerset Patriots to conduct its operations. The Somerset Patriots must be provided with assurance that any developments placed at the site not adversely impact, interfere with, or obstruct any of its operations. Additionally, the Patriots request that its representatives be included in all planning and discussions concerning potential development at the site.

Joseph Battipaglia

We urge that whatever remedial activities are approved by the USEPA and the NJDEP and carried out by Pfizer and its remediation contractors and consultants be performed in a manner that:

1. Is conducted transparently and communicated in a timely manner to the community;
2. Is conducted in a safe and responsible manner;
3. Minimizes or eliminates potential and actual environmental impacts on neighboring businesses and the community; and
4. Minimizes or eliminates potential and actual adverse impacts on the operations of neighboring businesses.

Toward that end, we urge that USEPA mandate, as a condition to the conduct of the Remedial Plan, that an onsite liaison to the community be appointed who shall be responsible for the following activities:

1. Interface with and be available to the community during the duration of the remedial activities;
2. Provide the community with periodic updates on all remedial activities and advance notice of all scheduled activities pertaining to the remediation;
3. Provide advance notice of remedial or other activities that may adversely affect the health, welfare and property of the citizenry, as well as adverse impacts on business operations or community activities; and
4. Have as a primary responsibility the duty to work with the community, business operators and governmental representatives to mitigate or eliminate all such adverse impacts of the remedial activities.

Thank you very much for your consideration. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

Steve Kalafer

Chairman
Somerset Patriots
1 Patriots Park
Bridgewater, New Jersey 08807

Res. No. 12-0326-5

RESOLUTION AUTHORIZING THE SUBMISSION OF
OFFICIAL COMMENTS TO EPA

WHEREAS, The Somerset Raritan Valley Sewerage Authority is a significant stakeholder in the water quality of the Raritan River and has an NJPDES Permit that controls and sets standards for the Authority's discharge of treated wastewater effluent to the environment; and

WHEREAS, the Authority has invested significant resources in monitoring, studying and modeling the Raritan River in order to aid it in identifying and addressing water quality issues in the Raritan River and the applicable environmental discharge permit limits; and

WHEREAS, the Authority has provided testimony at the March 8, 2012 Public Hearing on the proposed Feasibility Study dated February 2012 for the management and remediation of the contaminated groundwater and property. In its comments the Authority raised concerns regarding EPA/Pfizer's application to NJDEP for a NJPDES Permit Equivalency General Permit for the discharge to surface water of remediated groundwater. The Authority believes that a General Permit is not applicable to this site and discharge limits need to be set based on water quality standards because the Raritan River is currently listed as impaired for both Benzene and Arsenic.

NOW, THEREFORE, BE IT RESOLVED by The Somerset Raritan Valley Sewerage Authority Board of Commissioners that it has reviewed and approves the submission of written comments (within the mandated Public Comment timeline) expanding on the water quality issues we addressed at the Public Hearing and additional environmental concerns.

INTRODUCED BY: Robert Albano
SECONDED BY: Gail Quabeck

Roll Call Vote:

Arthur Quade	Yes	Richard Mathews	Yes
Richard DeLuca	Absent	Robert McCray	Yes
Carlos Mosquera	Yes	Joseph Lifrieri	Yes
Philip Petrone	Absent	Gail Quabeck	Yes
Peter Stires	Yes	Robert Albano	Yes
Carolann Garafola	Yes	Edward Machala	Yes
Herbert Vollers	Absent		

CERTIFICATION

I, Glen D. Petrauski, Executive Director and Certifying Agent of The Somerset Raritan Valley Sewerage Authority, **HEREBY CERTIFY** that the foregoing is a true copy of a Resolution adopted at a Regular Meeting of The Authority held on the 26th day of March 2012 as the same appears on record in the Minute Book of The Authority.

IN WITNESS WHEREOF I have hereunto set my hand and affixed the Seal of The Authority this 27th day of March 2012.

Glen D. Petrauski
Executive Director

GDP/rel

The
Somerset Raritan Valley
Sewerage Authority

March 22, 2012

VIA EMAIL AND USPS

Joseph Battipaglia, Remedial Project Manager
U.S. Environmental Protection Agency
290 Broadway, 19th Floor
New York, NY 10007-1866

RE: COMMENTS ON PROPOSED PLAN
AMERICAN CYANAMID (PFIZER) SUPERFUND SITE
BRIDGEWATER TOWNSHIP, SOMERSET COUNTY, NEW JERSEY

Dear Mr. Battipaglia:

On behalf of the Somerset Raritan Valley Sewerage Authority (SRVSA), I would like to thank you and the other EPA staff for your March 8, 2012 public presentation of the proposed remedial plan for the American Cyanamid (Pfizer) site. SRVSA has great interest in this project for three major reasons. First, the SRVSA treatment plant property is directly adjacent to this Superfund site. Second, SRVSA has treated the site's contaminated groundwater for many years, the quality of which can have a great impact on SRVSA's treatment efficiency and therefore the quality of SRVSA's effluent. Third, SRVSA has worked tirelessly to improve water quality in the Raritan River, which is now being impacted by the American Cyanamid site.

I have prepared this letter to provide our comments on the proposed plan for remediating the site as summarized in EPA's February 2012 summary document and as described in EPA's presentation at the Public Hearing on March 8, 2012. Our comments are focused on the treatment of the contaminated shallow groundwater, which is presently leaching out into the Raritan River at concentrations orders of magnitude over surface water quality standards.

SRVSA is very supportive of the decision made by EPA and Pfizer to construct a treatment facility dedicated to treating the contaminated shallow groundwater (on the American Cyanamid site). Given the pollutant concentrations detected in this shallow groundwater, SRVSA was very concerned about accepting this waste stream for treatment at its plant, even with pre-treatment, which would likely have been required. Furthermore, we have been informed by Pfizer that it is their intention to discontinue sending its contaminated deep groundwater to SRVSA within the next five years, and we are quite supportive of that plan as well.

Our only concern with the proposed construction of the on-site wastewater treatment plant to treat the American Cyanamid contaminated groundwater is that its discharge quality be maintained in such a fashion that water quality in the receiving streams (Cuckels Brook and

POLHEMUS LANE • P.O. BOX 6400 • BRIDGEWATER, NEW JERSEY 08807-0400
TEL: (732) 469-0593 • FAX: (732) 469-4179

Raritan River) be maintained. This issue was addressed by SRVSA's Water Quality Consultant, James Cosgrove of Omni Environmental LLC, in a letter to NJDEP dated March 9, 2012 (attached). Simply stated, it is critical that the Pfizer discharge be required to satisfy all New Jersey Surface Water Quality Standards. We are concerned that generic, pre-defined and non-site specific effluent standards are going to be applied to this discharge (N.J.A.C. 7:14A-12: Appendix B). Should such effluent standards be applied, given the very small amount of assimilative capacity in Cuckels Brook under critical low flow conditions, stream standards are guaranteed to be violated. Therefore, it is imperative that water quality based effluent limits be set for this discharge.

Furthermore, Pfizer is proposing to discharge the effluent from its treatment plant to Cuckels Brook, which is SRVSA's current receiving stream. It is critical that EPA recognize that SRVSA has recently constructed a new outfall directly to the Raritan River. Therefore, the flow from SRVSA, which typically makes up more than 90% of the water in Cuckels Brook, will no longer be available for assimilative capacity for the Pfizer discharge. Water quality based effluent limits must be established without the benefit of the SRVSA flow.

Once the proper effluent limits are set for the proposed discharge, how is EPA proposing to monitor the impact on the receiving streams? Has EPA collected baseline water quality data in Cuckels Brook and the Raritan River to have a means of comparison with water quality in the future? If so, SRVSA would appreciate being provided with such data. Will EPA be monitoring the receiving streams to evaluate the benefit of removing the contaminated seeps, treating the contaminated groundwater, and discharging it to Cuckels Brook? Since the Raritan River in the area of the American Cyanamid property is listed as being impaired for arsenic and benzene (two of the many contaminants found at extremely high levels in the site's groundwater), it is critical that a monitoring program be implemented so that the ultimate goal of obtaining compliance with stream standards can be quantified.

It is also important to note that SRVSA has been collecting water quality data in Cuckels Brook and the Raritan River for over two decades. We have utilized those data to develop sophisticated water quality models of the system. Our consultant, Omni Environmental LLC, recently worked with NJDEP to model the waterways in the entire Raritan River Basin for the Total Maximum Daily Load (TMDL) study, but was not able to finalize the TMDL in this segment of the Raritan River because of the unexplained effects on dissolved oxygen dynamics, which may be due to the toxics originating from the American Cyanamid site. We believe that SRVSA and Omni Environmental may have more information on water quality in the receiving streams in this area than any other entity, and we would be pleased to share our knowledge with EPA.

Obviously, given SRVSA's location, its partnership with Pfizer in treating its contaminated groundwater for so many years, and its work with the NJDEP Divisions of Water Quality and Watershed Management, the Authority believes we are a major stakeholder in this process and in maintaining/enhancing water quality in the watershed. SRVSA stands ready to assist EPA in its role in cleaning up this site and removing a major source of contamination to the nearby waterways.

We thank you for the opportunity to offer our comments and look forward to discussing these matters with you in the near future.

Very truly yours,

Glen D. Petrauski
Executive Director

c: Board of Commissioners
Joseph J. Maraziti, Jr., Esq.
James F. Cosgrove, Jr., P.E.
SRVSA Participants
Robert P. Bzik, Somerset County Planning Board

American Cyanamid Superfund Site - Bridgewater Township, N.J.
Bastura, Tara
to:
Joseph Battipaglia
02/16/2012 02:34 PM
Hide Details
From: "Bastura, Tara" <tbastura@sealandenviro.com>

To: Joseph Battipaglia/R2/USEPA/US@EPA

Hello Joseph:

Do you have an estimate as to when the American Cyanamid Superfund Site in Bridgewater Township, NJ will come out for bid? Thank you for your time. Tara

Tara Bastura
Business Development Coordinator
Sealand Enviro, LLC
58 Pomfret Street
Putnam, CT 06260
p. 413.540.1407
f. 860.315.9019
www.sealandenviro.com

SEALAND ENVIRO
AN O'CONNELL COMPANY

Committed to the restoration of our natural environment and the protection of human health and safety.

O'CONNELL
The O'Connell Companies, Inc.

SEALAND ENVIRO

Sealand Enviro is a national environmental services company providing management and construction services for the restoration of sites contaminated by hazardous, toxic and low-level radioactive waste. We provide a comprehensive range of services for site remediation, restoration and environmental response. Sealand Enviro is headquartered in Putnam Connecticut and is owned by The O'Connell Companies and Sealand Enviro management. We draw from the considerable resources, 130 year operating history and culture of our parent company and its affiliates. Our customers include large industrial and real-estate companies, Federal and state agencies, and leading engineering and design firms. We are committed to assisting in the restoration of our natural environment and the protection of human health and safety.

OUR SERVICES

Sealand Enviro provides its management and construction services as a prime contractor or team participant on large scale and complex assignments involving the remediation and restoration of sites contaminated by hazardous, toxic or low-level radioactive waste. Our assignments range from Superfund, and Federal property restoration to large scale Brownfield redevelopment. Our projects may include some of the following remediation and restoration services. We do not own or license environmental technologies allowing us to select the most appropriate and cost effective solution for each specific project. Sealand Enviro qualifies as a small business under the Company's primary Federal NAICS code 562910 — Environmental Remediation Services (500 employees).

AREAS OF SPECIALIZATION

- Remedial construction and site closure
- Decontamination and decommissioning
- Demolition and beneficial reuse
- In situ and ex situ soil treatment
- Thermal desorption
- Soil vapor extraction
- Bioremediation
- Stabilization and fixation
- Contaminant containment
- Slurry walls and landfill capping
- Contaminated sediment dredging and handling
- Groundwater recovery and treatment
- Transportation and disposal of HTRW
- Volume reduction of LLRW
- Ecological restoration
- Natural disaster response

PROJECTS

Sealand Enviro is an accomplished environmental remediation contractor. We have completed complex restoration projects for government agencies and private sector clients nationwide. Our projects are performed in compliance with CERCLA, RCRA, SARA, HSWA, TSCA, CWA, CAA and other Federal and state regulations.

SUPERFUND

Montclair West Orange and Glen Ridge Radium Sites, NJ,
Excavation and disposal of 100,000 CY of low-level radioactive waste.

Salem Acres Superfund Site, MA,
Remediation of 100,000 CY of hazardous sludge and soils from onsite lagoons.

McGillis & Gibbs Superfund Site, MN,
Remediation of old pole wood treatment facility of hazardous waste.

North Lawrence Superfund Site, MA,
Remediation of heavy metal contamination by stabilization/ solidification and construction of onsite storage cell.

Li Tungsten Superfund Site, NY,
Remediation of radioactive tungsten ore and debris from 26 acre site.

Sayerville Landfill Superfund Site, NJ,
Remediation including removal of hundreds of 55 gallon drums of RCRA TSCA materials and construction of landfill containment cap.

BROWNFIELD

Worcester Medical City Site, MA,
Remediation of 42 commercial and industrial properties on 25 acres resulting in model brownfields redevelopment.

Reed and Prince, MA,
Remediation of 13 acre site of former screw manufacturing facility in Worcester, MA.

Waterbury Scovill Brass Industrial Facility, CT, Remediation of 96 acre site including 150,000 CY of contaminated soils and on-site treatment.

Natick RUST Program, MA,
Pilot residential underground storage tank removal and remediation project at 500 home sites.

Westinghouse Manufacturing Site, MA, Remediation and redevelopment of 39 acre site in Springfield MA.

FEDERAL, STATE & MUNICIPAL

DOD Loring Air Force Base, ME,
Remediation of various operable units on 9,000 acre site over four year period as part of base closure.

DOD Fort Bliss Oil Pits, TX,
Remediation of 30,000 CY of oil and pesticide contaminated soils using a transportable direct fired thermal desorption unit.

Airport Remediation, NY & NJ,
Remediation of contaminated sites at LaGuardia, Kennedy and Newark airports including emergency response services.

MHD Storrow Drive Bridge, MA,
Environmental work, Dredging, management and disposal of TSCA contaminated sediment.

DOE Brookhaven National Labs, NY,
Excavation and on-site landfill capping of low-level radioactive waste.

SWSC Indian Orchard Pump Station, MA, Environmental work, Remediation and disposal of RCRA and TSCA contaminated soils.

MDT Lyman Street Bridge Replacement, MA, Environmental work, Excavation and disposal of contaminated soils and water.

Palmer Dam Dean's Mill Water Treatment Plant, CT, Environmental work, Demolition and remediation of contaminated materials and sediments.

MDC Aeration & Final Settling Tanks, CT, Environmental work, excavation and disposal of 80,000 CY of contaminated soil.

Groundwater Removal and Treatment System, North Carver, MA,
Groundwater VOC remediation system for MA DEP.

Emergency Response TWA Flight 843, JFK International, NY,
Emergency response and remedial activities.

INSURANCE AND SURETY

Sealand Enviro benefits from the 130 year legacy and strong financials of our parent company. Sealand Enviro maintains its own A+ rated insurance and surety coverage as follows;

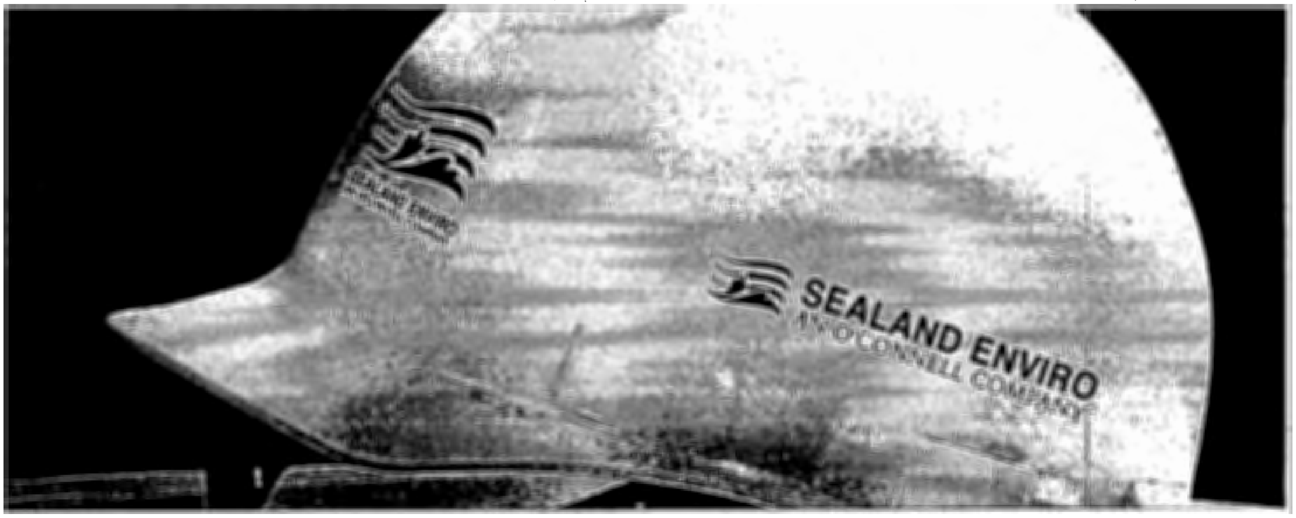
Insurance

Sealand Enviro maintains Commercial General Liability, Environmental Liability and Professional Services Liability coverage of $12 million with an A+ rated insurance company.

Surety

Sealand Enviro maintains a surety total work program exceeding $75 million with A+ rated Travelers Casualty and Surety Company of America.

For additional information on our insurance and surety coverage please contact Melissa J. Piers at mpiers@thewattsgrp.com



SEALAND ENVIRO

ENVIRONMENTAL, HEALTH SAFETY (EHS) POLICY

Sealand Enviro is a prime environmental contractor providing services on large scale and complex assignments involving the restoration of sites contaminated by hazardous, toxic and low-level radioactive waste. Due to the nature of our work, protection of human health, safety and the environment is of utmost importance. Our commitment to these goals includes the following:

- **We work toward a goal of zero employee injuries and occupational illness.**
- **All levels of leadership are accountable for implementing our EHS Policy.**
- **All employees are accountable for following safe work practices and procedures.**
- **We comply with all applicable EHS laws and regulations that apply to our work.**
- **We provide workplace policies, procedures, training and equipment to all employees.**
- **We track and report performance against our EHS standards and seek opportunities to improve upon our EHS program at all times.**
- **We work to ensure the health and safety of our subcontractors in our shared work environment.**
- **We work to lessen the environmental impact of our operations and incorporate sustainability in all business areas.**

Our commitment to EHS is unwavering. We evaluate our procedures and operations on a quarterly basis and incorporate improvements where appropriate. We will always work to continually improve upon our EHS policies and procedures.

Brian L. Mackenzie, 2011
President/CEO, Sealand Enviro

THE O'CONNELL COMPANIES HISTORY

The history of our company begins in 1879, on the streets of Holyoke, Massachusetts. Our company's founder, Daniel O'Connell, quit his job as Holyoke's Superintendent of Streets, rather than fire his crew to make room for a new Mayor's friends. The next day, this company was founded.

A century later, in 1979, The O'Connell Companies was established as the parent company of Daniel O'Connell's Sons, O'Connell Development Group, Appleton Corporation and a number of other O'Connell subsidiaries, including Sealand Enviro. The history of The O'Connell Companies is the story of hard-working people building a reputation of integrity and quality, and always following Daniel's motto to "Strive for Excellence."

Beginning in the 1970s our company expanded and diversified beyond the local market and into fields related to construction, including real estate development and property management, hydroelectric facilities, and sludge processing facilities.

Daniel O'Connell's Sons has grown since 1879 from a local general contractor building roads and bridges to a regional construction company offering sophisticated construction management and general contracting services to both public and private clients.

NEFCO (New England Fertilizer Company) was formed in 1993 to operate a plant in Massachusetts which converts sewage sludge into pelletized fertilizer. Today NEFCO operates additional fertilizer treatment plants in Massachusetts, Florida, Maryland, and Minnesota.

NEFCO

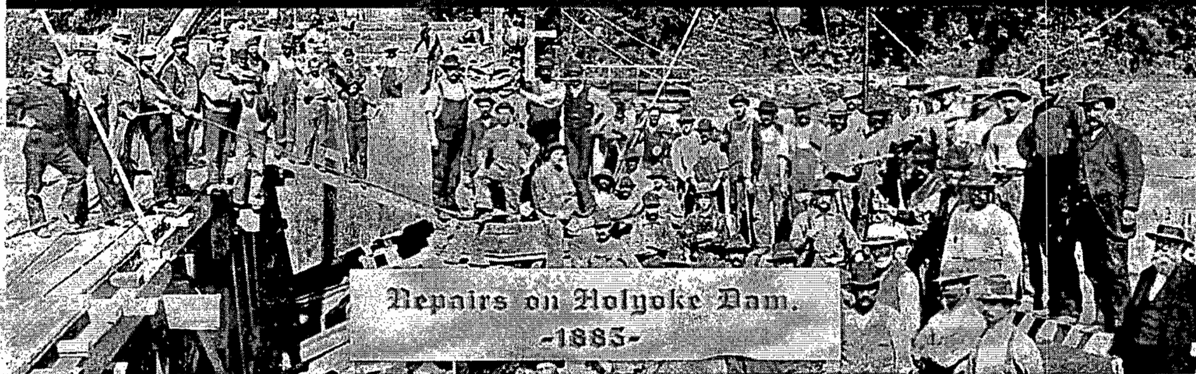
O'Connell Development Group (ODG) pursues development opportunities for both The O'Connell Companies and outside clients. One particular focus of ODG was the development of hydroelectric facilities, and O'Connell Energy Group evolved from ODG to develop, finance, construct, operate, and manage hydroelectric facilities throughout the Northeast.

Appleton Corporation manages real estate, and provides facilities management for both residential and commercial customers, resident services pro-grams, security, and accounting and financial services.

Sealand Enviro is the newest subsidiary in our family of companies. With O'Connell's expertise in environmentally-friendly ventures and Sealand's focus on environmental remediation, the blending of our two companies was a natural fit. Our customers benefit from the combined experience and know-how of our senior management, who successfully tackle the most technically-complex projects.

SEALAND ENVIRO LLC 58 POMFRET STREET, PUTNAM, CT 06260; PHONE 413.540.1405

SEALAND ENVIRO
AN O'CONNELL COMPANY



SEALAND ENVIRO FACT SHEET

HEADQUARTERS

58 Pomfret Street
Putnam, CT 06260
Phone 413.540.1405

Bonding limit
- $100M

Standard insurance coverage
- $12M

Small business qualification
- NAICS 562910 Environmental Remediation Services (<500 employees)

CLIENTS

U.S. Federal, state and local agencies
Private corporations, including Fortune 500 companies

PROJECT LOCATIONS

U.S. and Canada

PROJECT TYPES

Self performed environmental remediation and restoration services

ENVIRONMENTAL HEALTH & SAFETY

Behavior based Health & Safety program
ISO 14001 and OHSAS 18001 based

CORPORATE INFO

PARENT COMPANY

The O'Connell Companies
480 Hampden Street
Holyoke, MA 01040

Year parent company established
- 1879

AFFILIATE COMPANIES

- O'Connell Development Group
- Daniel O'Connell's Sons
- NEFCO
- Appleton Corporation

American Cyanamid Superfund Project
Bastura, Tara
to:
Joseph Battipaglia
03/07/2012 12:59 PM
Hide Details
From: "Bastura, Tara" <tbastura@sealandenviro.com>

To: Joseph Battipaglia/R2/USEPA/US@EPA

History: This message has been replied to.

2 Attachments

Sealand Enviro Brochure.pdf Seland Enviro Fact Sheet.pdf

Hello Joseph:

I am writing to introduce our company Sealand Enviro, LLC. We are a remediation contractor with extensive experience in HTRW environmental cleanup projects. Our parent company - The O'Connell Companies provides exceptional financial and technical resources support on each of our assignments. Attached please find a brief overview on us. I would like to inquire who I need to contact to find out more about the opportunity to bid on the upcoming American Cyanamid Superfund Project. Thank you for your assistance. Tara

Tara Bastura
Business Development Coordinator
Sealand Enviro, LLC
58 Pomfret Street
Putnam, CT 06260
p. 413.540.1407
f. 860.315.9019

www.sealandenviro.com

Fw: Safety Kleen Cleanup at American Cyanamid Superfund Site in Bridgewater Township, N.J.
Elias Rodriguez to: Joseph Battipaglia 02/17/2012 10:09 AM

History: This message has been replied to.

----- Forwarded by Elias Rodriguez/R2/USEPA/US on 02/17/2012 10:09 AM -----

From:	"Cantelmo, Michael C" <Michael.Cantelmo@safety-kleen.com>
To:	Elias Rodriguez/R2/USEPA/US@EPA
Date:	02/17/2012 10:03 AM
Subject:	Safety Kleen Cleanup at American Cyanamid Superfund Site in Bridgewater Township, N.J.

Hope all is well. I would like to introduce myself. My name is Michael Cantelmo from Safety-Kleen Systems, Inc. I would like to know if we can help you with the Cleanup at American Cyanamid Superfund Site in Bridgewater Township, N.J. If there is anything that I can quote, please let me know. My contact info is listed below.

Have a great day,

Michael Cantelmo
Market Sales Specialist
Safety-Kleen Systems, Inc
E michael.cantelmo@safety-kleen.com
P 908.791.9600
C 908.463.6251
F 908.791.9620
W www.safety-kleen.com

American Cyanamid Site in Bridgewater
[redacted]
to:
Joseph Battipaglia
02/16/2012 02:54 PM
Cc:
[redacted]
Hide Details
From: [redacted]

To: Joseph Battipaglia/R2/USEPA/US@EPA

Cc: [redacted]

1 Attachment

image001.gif

Joseph Battipaglia,

Has on-site thermal destruction been taken off the table for consideration on this site? Obviously it would provide the cleanest methodology that would clean up the site in the shortest period of time. There is a thermal treatment that has no emissions that you might not yet know about - http://www.sarexusa.com/index.htm. I'd appreciate your thoughts on the potential of this cost saving technology and the potential of this technology for this cleanup.

Sincerely,

[redacted]

Local 472

PARENT ORGANIZATION:
LABORERS' INTERNATIONAL UNION OF NORTH AMERICA

Heavy and General Construction Laborers' Union

AFFILIATED WITH:
NEW JERSEY STATE AFL-CIO
NEW JERSEY STATE BUILDING AND CONSTRUCTION TRADES COUNCIL

JOSEPH P. MADDEN BUILDING, 700 RAYMOND BOULEVARD, NEWARK, NEW JERSEY 07105
PHONE: (973) 589-5050 • FAX: (973) 589-0582

May 15, 2012

Mr. Joseph Battipaglia
Remedial Project Manager
USEPA
290 Broadway, 19th Floor
New York, NY 10007-1866

My name is Tony Oliveira, I am Business Manager of Heavy Construction Laborers Local 472, representing roughly seven thousand (7,000) members in Northern New Jersey.

I am writing to you in support of Remedial Action 4a which encompasses consolidation/treatment soil cover/stabilization and capping. We believe the preferred alternative will provide the best tradeoff among all the other alternatives based on the extensive study conducted by the EPA. The remedial alternative chosen consists of two components very important to our members, many who live in nearby communities. The key components are the protection of the environment and human health.

I think it's important to note that approximately twenty percent (20%) of our entire membership are eighty (80) hour Haz-Mat trained in addition to, and equally worth noting is that Local 472 members have been working on that site for almost twenty (20) years. First with American Cyanamid then Wyeth and now Pfizer and now we look forward to working with the EPA on the project going forward.

Lastly, the project will provide many good paying jobs with benefits for our members. Local 472 members are ready, willing and able to assist the EPA in the continued remediation of the site and look forward to seeing it to completion.

Sincerely,

Tony Oliveira

Tony Oliveira
Business Manager

American Cyanamid Superfund Site - New Jersey
Kurt Pugh
to:
Joseph Battipaglia
02/17/2012 03:23 PM
Hide Details
From: Kurt Pugh <kpugh@terracontracting.net>

To: Joseph Battipaglia/R2/USEPA/US@EPA

Hello Mr. Battipaglia –

We are an environmental contractor based in Michigan with extensive experience in contaminated soil removal and have worked on several Superfund sites.

We would like to contact the engineering firm who will be handling this project – do you know which firm that is and who the contact would be?

Or if there is someone else I should contact for this information please advise.

Thank you.

KURT PUGH | BUSINESS DEVELOPMENT | *kpugh@terracontracting.net*
Terra Contracting, LLC | 5787 Stadium Drive | Kalamazoo, MI 49009
P: (269) 375-9595 | F: (269) 375-2830 | (866) 354-8963
www.terracontracting.net

INTEGRITY SAFETY CUSTOMER FOCUS INTENSITY TRAINING TEAMWORK

BRANCH OFFICE
6 WESLEY COURT
MIDDLETOWN, NEW YORK 10941
(914) 692-0101
FAX 1-914-692-0147

BRANCH OFFICE
5 ALLISON DRIVE
CHERRY HILL, NEW JERSEY 08003
(856) 424-0590
FAX 1-856-424-0914

International Union of Operating Engineers

AFFILIATED WITH AFL-CIO

Local Union No. 825, 825A, 825B, 825C, 825D, 825R, 825RH

65 SPRINGFIELD AVENUE
SPRINGFIELD, NEW JERSEY 07081
(973) 921-1900

USEPA
290 Broadway 19th floor
New York, NY 10007-1866

May15, 2012

Attn: Joseph Battipaglia
Remedial Project Manager

Re: American Cyanamid Superfund /Pfizer Site

To Mr. Battipaglia,

The International Union of Operating Engineers Local 825 has members that reside in Somerset County, NJ, where The American Cyanamid /Pfizer Site is located. The site encompasses approximately 435 acres and was used for chemical and pharmaceutical manufacturing operations during the past 80 years.

We support the EPA Remedial Alternative 4A Consolidation/Treatment/Soil Cover and Stabilization/Capping with Hydraulic Control/Treatment of Ground Water. This is a responsible alternative that will provide a safe and effective way to remediate the American Cyanamid/ Pfizer Site.

On behalf of our Somerset County members, we would like to thank the USEPA for the proposed plant for the American Cyanamid Pfizer Site in the Township of Bridgewater, New Jersey. The project will provide an opportunity for Local 825 members to work and become a part of the cleanup efforts.

Thank You,
Lino Santiago
Business Representative
IUOE Local 825
Phone: 973-671-6961
Fax No: 973-671-9261
Cell: 973-617-6431
Email: lsantiago@iuoe825.org