

Pre-Demolition Environmental Removals

Project Completion Report

Curtis Specialty Papers Site

Milford, New Jersey

December 2013

Prepared For:

United States Environmental Protection
Agency
New York, NY

Prepared By:

International Paper Company
Georgia-Pacific Consumer Products, LP
ARCADIS



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Executive Summary

Between 2011 and 2013, International Paper Company (IP) and Georgia-Pacific Consumer Products, LP (GP) implemented an early response action to remove hazardous or regulated materials identified in buildings at the Curtis Specialty Papers Site located at 404 Frenchtown Road, Milford, New Jersey. This pre-demolition environmental removal (PDER) activity complied with federal, state and local regulations and enabling sections of the Administrative Order on Consent (AOC) and AOC Amendment No. 1 between the United States Environmental Protection Agency (USEPA) and IP and GP (Comprehensive Environmental Response, Compensation, and Liability Act [CERCLA] Docket No. 02-2009-2017).

PDER activities included:

- equipment oil removal
- aboveground storage tank (AST) residuals removal
- flyash removal
- lead-based paint (LBP) removal
- asbestos-containing materials (ACM) abatement
- galbestos removal
- universal waste (batteries, mercury-containing devices, lamps, light ballasts, fire extinguishers, sprinkler heads, electronic waste, EXIT signs, containerized chemicals and refrigerant-containing equipment) removal
- process piping decommissioning

Materials removed as part of PDER activities were handled and transported for off-site disposal/recycling in accordance with applicable federal, state and local regulations.

Material quantities removed during the PDER included:

- Equipment oil removal and process pipe decommissioning – Approximately 1,150 gallons of equipment oil and process piping residuals and 165 pounds of stored oil, grease and tar
- AST residuals removal – Approximately 67,680 pounds of solid AST residuals and/or absorbent materials and 4,606 gallons of liquid AST residuals

- Flyash removal – Approximately 305 tons of flyash
- LBP removal – Approximately 112,180 pounds (non-Toxic Substance Control Act [TSCA] regulated) and 16,350 kilograms (TSCA regulated) of LBP
- ACM abatement – Approximately 635 tons of non-friable ACM and 580 tons of friable ACM
- Galbestos removal – Approximately 88,207 kilograms of galbestos
- Universal waste removal – Approximately 32,800 pounds of universal wastes
- Impacted concrete – Approximately 1,600 pounds (non-TSCA regulated) and 5,718 kilograms (TSCA regulated) of impacted concrete
- Scrap metal – Approximately 321 tons of recycled metal

Certain tasks (i.e., ACM removal from piping on the roof and other inaccessible areas, flyash removal from the hopper, and refrigerant removal from the roof) remain due to structural issues with building roofs. These tasks will be completed during future demolition activities.

1. Introduction

International Paper Company (IP), Georgia-Pacific Consumer Products, LP (GP), and ARCADIS prepared this *Pre-Demolition Environmental Removals Project Completion Report* (PDER Report) for the Curtis Specialty Papers Site located at 404 Frenchtown Road, Milford, New Jersey (the site) (Figure 1).

On June 4, 2009, IP and GP entered into an Administrative Settlement Agreement and Order on Consent (AOC) with the United States Environmental Protection Agency (USEPA) to perform a Remedial Investigation and Feasibility Study (RI/FS) at the site (Comprehensive Environmental Response, Compensation, and Liability Act [CERCLA] Docket No. 02-2009-2017). The requirements of the AOC included implementation of pre-RI/FS evaluation activities. The building-related components of the pre-RI/FS evaluation activities were summarized in the *Pre-Remedial Investigation/Feasibility Study Building Survey Report* (Building Survey Report) (IP et al. 2009a). Additional building evaluation activities were conducted in June 2010 by IP and GP, including the investigation and sampling of suspect asbestos-containing materials (ACM) from the interior of site boilers, detailed in the IP and GP Boiler Investigation and Suspect Asbestos Containing Material Sampling letter report submitted to the USEPA on July 12, 2010. A structural evaluation of site building roofs was detailed in the *Evaluation of Building Roofs*, provided by Thor Engineers, PA on June 18, 2010.

Following completion of building-related pre-RI/FS activities, IP, GP and USEPA entered into AOC Amendment No. 1 on November 8, 2010. IP and GP submitted a *Pre-Demolition Environmental Removals Work Plan* (PDER Work Plan) (IP et al. 2010a) pursuant to AOC Section XI.56.d and AOC Amendment No. 1. These AOCs allow IP and GP to undertake a response action for pre-demolition activities. USEPA approved the PDER Work Plan that outlines a response action based on building-related information obtained from pre-RI/FS activities and building-related recommendations in the USEPA May 13, 2008 Removal Site Evaluation (RSE). IP and GP also submitted contractor plans for PDER activities.

1.1 Site Setting

The site is a former food-grade paper mill located along the Delaware River. It occupies approximately 109 acres on Block 13, Lot 5.01 and Block 19, Lot 51 in the Borough of Milford and Block 17.01, Lot 1.01 in Alexandria Township.

Paper production began at the site in 1907 and ended in 2003. During these 96 years, four operational areas developed at the site (Figure 2):

- Main Mill Area (MMA) – process and office facilities of the Main Mill, a cogeneration power plant and loading/unloading areas
- Coatings Facility Area (CFA) – the Coatings Facility, former solvent recovery building and supporting outbuildings (demolished, with the exception of Building 74, in 2012)
- Wastewater Treatment Plant Area (WWTPA) – two clarifier basins, a settling tank and intake/outfall structures on the shoreline of the Delaware River
- Coal Pile and Aeration Basin Area (CPABA) – currently undeveloped (an aeration basin was demolished in 2011 and supporting outbuildings were demolished in 2013); historically a portion of the area served as a staging area for coal that powered site operations

Site operations ceased in 2003 and the site has remained vacant since that time. Buildings in the CFA (excluding Building 74) were demolished in 2012 and supporting outbuildings in the CPABA were demolished in 2013; other buildings remain standing. Security personnel and chain-link fencing restrict access to the site.

1.2 Previous Building Material Investigations and Early Response Actions

IP and GP previously implemented building material investigation activities at the site. The following reports summarize previous building material investigation activities:

- Pre-Remedial Investigation/Feasibility Study Building Survey Report (IP et al. 2009a), submitted to the USEPA on November 19, 2009, summarized results of pre-RI/FS activities involving buildings, building materials and building components, including:
 - visual inspection of building interiors
 - visual inspection of suspect ACM (including presumed ACM) for damaged, friable material
 - collection and analysis of asbestos air samples as per Occupational Safety and Health Administration (OSHA) guidelines
 - collection and analysis of bulk samples of damaged, friable, suspect ACM
 - visual inspection and inventory of building components/storage vessels
 - visual inspection and inventory of interior sumps and floor drains

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- identification and sampling of buildings, building materials and building components
- Pre-Remedial Investigation/Feasibility Study Report (IP et al. 2009b), submitted to the USEPA on November 19, 2009, summarized results of pre-RI/FS activities conducted exterior to buildings, including visual inspections of:
 - building exteriors
 - exterior sumps and floor drains
 - discharge piping
 - underground storage tanks (USTs)
 - monitoring and production wells
- Boiler Investigation and Suspect Asbestos Containing Material Sampling letter, submitted to the USEPA on July 12, 2010, summarized results of the following activities:
 - visual inspections of the site boilers (interior and exterior) for suspect ACM
 - collection and analysis of bulk samples of suspect ACM
 - collection and analysis of asbestos air samples as per the OSHA guidelines
- Building Characterization Sampling Report (BCSR), submitted to the USEPA on January 10, 2011, summarized results of building material sampling activities involving various building media and components, including:
 - representative concrete/masonry
 - discrete concrete/masonry
 - firebrick and glazed block material
 - caulk/mastic/expansion joint material
 - galbestos
 - painted wood
 - loose paint chips

- coal ash
- sumps/pits/sewer raceway/intake basin/wastewater treatment plant clarifiers residual material
- Supplemental Building Characterization Sampling Report (SBCSR), submitted to the USEPA on November 9, 2012, summarized results of supplemental building material sampling activities involving concrete and masonry.

In addition, IP and GP previously implemented the following actions associated with building materials/building components at the site:

- *Early Response Actions*
 - *Oil-containing electrical equipment removal.* IP and GP removed oil-containing electrical equipment. The removal activities are summarized in the Early Response Action Report – Oil-Containing Electrical Equipment Removal (IP et al. 2009c), submitted to USEPA on October 26, 2009.
 - *Removal of damaged asbestos-containing roofing debris.* In August 2009, IP and GP removed damaged asbestos-containing roofing debris that had blown onto the ground from a roof adjacent to Building 80 and loose transite pipe pieces located southeast of Buildings 10A/10B and the Unnamed Tributary. The items were placed in appropriate containers and staged in Building 50 at the site.
 - *Removal of garage buildings (Buildings 100 and 101).* IP and GP demolished Buildings 100 and 101 in January 2010.
- *Demolition of the CFA.* IP and GP demolished CFA Buildings 33-37, 54, 57, 73, 76, 106 and 108 from February 15, 2012 through May 12, 2012. Demolition activities were conducted in conjunction with PDER activities within the CFA. Demolition debris was identified, segregated, salvaged, recycled, and/or containerized and disposed in accordance with applicable rules and regulations. Concrete and masonry materials that will potentially be reused onsite for fill material are staged onsite. A report documenting the CFA demolition work (CFA Demolition Project Completion Report) is in preparation and will be submitted under separate cover.
- *Removal of CPABA Outbuildings.* IP and GP demolished CPABA Buildings 114, 115, 116 and 117 from September 26, 2013 through October 18, 2013. Demolition debris was identified, segregated, salvaged, recycled, and/or containerized and

disposed in accordance with applicable rules and regulations. Concrete and masonry materials that will potentially be reused onsite for fill material are staged onsite.

1.3 Overview

Between 2011 and 2013, IP and GP implemented an early response action to perform PDER (i.e., remove hazardous and/or regulated materials identified in the Building Survey Report and the supplemental boiler investigation) in the former MMA with the exception of Building 102 (brick house), former CFA, former WWTPA and former CPABA of the site.

A description of PDER activities was provided to USEPA in the PDER Work Plan (IP et al. 2010a) and a letter dated April 13, 2011 by IP and GP's PDER subcontractor (Royal Environmental Inc. [Royal]) in response to a USEPA comment letter dated March 25, 2011. Royal's letter included the following plans: process piping decommissioning, equipment oil characterization, site management, asbestos abatement, and health and safety plan. USEPA approved the PDER Work Plan (IP et al. 2010a) and the additional plans described in Royal's March 25, 2011 letter on April 21, 2011.

After obtaining work permits and utility clearance, Royal mobilized to the site to initiate PDER activities in accordance with the USEPA-approved PDER Work Plan (IP et al. 2010). PDER activities commenced in May 2011 and included the following tasks:

- equipment oil removal
- aboveground storage tank (AST) residuals removal
- flyash removal
- lead-based paint (LBP) removal
- ACM abatement
- galbestos removal
- universal waste removal
- process piping decommissioning

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PDER activities were also conducted in accordance with procedures outlined in January 25, 2012 and March 16, 2012 notifications and applicable federal, state and local regulations, including Title 29 of the Code of Federal Regulations (CFR) (OSHA regulations) and Title 40 CFR (Protection of the Environment [USEPA] regulations). Laboratory analyses of waste characterization samples were conducted by Accutest Laboratories (Accutest) located in Dayton, New Jersey. Copies of analytical data reports are provided in Appendix A.

The remaining sections of this PDER Report outline the work activities conducted by IP and GP to complete PDER activities.

2. Project Implementation

On behalf of IP and GP, ARCADIS prepared a *Request for Proposal – Pre-Demolition Environmental Removals* (RFP) that consisted of technical specifications, figures, and historic drawings and documents.

Unless otherwise indicated below, IP and GP implemented the project in accordance with the technical specifications and figures. Following USEPA approval of the PDER Work Plan (IP et al. 2010), Royal mobilized to the site. PDER activities were conducted by Royal, its licensed ACM subcontractor, Indian Arrow Company, and its licensed refrigerant subcontractor, Interstate Refrigerant Recovery, Inc. PDER activities conducted by Royal commenced in May 2011 and ended in November 2012. ARCADIS' subcontractor, Land N Sea Environmental, Inc. (LNS), performed certain PDER and site maintenance activities prior to, concurrently with and following (i.e., through 2013) completion of PDER activities conducted by Royal.

A summary of waste removed as part of PDER activities and shipped offsite for disposal or recycling is provided in Table 1.

2.1 Equipment Oil Removal, Containerization, Transportation and Disposal

Equipment oil was removed by Royal, bulked (as appropriate based on disposal classification), and staged in United States Department of Transportation (USDOT)-approved containers for transportation and off-site disposal in accordance with applicable regulations. Royal removed equipment oil by first placing a secondary containment of bermed plastic sheeting or splash pans beneath the oil-containing equipment, then opening the drain plug allowing the oil to drain to a collection container. The oils were consolidated into drums and each drum was sampled by ARCADIS for waste characterization. The collected bulk oil was transported for off-site disposal/recycling in accordance with 40 CFR Part 279. Oil containing polychlorinated biphenyls (PCBs) at regulated concentrations was transported for off-site disposal as a TSCA-regulated waste in accordance with 40 CFR Part 761. Where characterization activities indicated the oil was regulated under TSCA, the equipment reservoir was further rinsed in accordance with 40 CFR Part 761.

Royal and LNS removed approximately 1,150 gallons of equipment oil and process piping residuals and 165 pounds of stored oil, grease and tar (collectively, equipment oil) and transported the equipment oil to Clean Earth of New Jersey, Inc. in South Kearny, New Jersey or Cycle Chem, Inc. in Elizabeth, New Jersey. Documentation of equipment oil disposal, including rinsate, is provided in Appendix B. Analytical data used for waste characterization are included in Table 2.

2.2 Aboveground Storage Tank Residuals Removal, Containerization, Transportation and Disposal

AST residuals were removed by Royal, bulked (as appropriate based on disposal classification) and staged in USDOT-approved containers for transportation and off-site disposal in accordance with applicable regulations. Prior to removal of residuals, a secondary containment of bermed plastic sheeting or splash pan was placed beneath an AST. Following residuals removal, absorbent pads were placed in the ASTs to remove trace quantities of liquids. Where characterization activities indicated residuals were regulated under the Resource Conservation and Recovery Act (RCRA) or TSCA, alternate rinse protocols were performed in accordance with applicable regulations.

Approximately 67,680 pounds of solid AST residuals and/or absorbent materials and 4,606 gallons of liquid AST residuals were removed during this phase of work and disposed of at Conestoga Landfill in Morgantown, Pennsylvania; Clean Earth of New Jersey, Inc. in South Kearny, New Jersey; Chemical Waste Management (CWM) Chemical Services, LLC in Model City, New York; or Cycle Chem, Inc. in Elizabeth, New Jersey. Documentation of AST residuals disposal is provided in Appendix B. Analytical data used for waste characterization are included in Table 2.

2.3 Flyash Removal, Containerization, Transportation and Disposal

Flyash was removed by Royal from bins and boilers, and staged in appropriate USDOT-approved containers for transportation and off-site disposal in accordance with applicable regulations. Flyash located in the hopper was found to be inaccessible by Royal and will be removed during future demolition activities.

Approximately 305 tons of flyash were removed during this phase of work and disposed of offsite at Conestoga Landfill in Morgantown, Pennsylvania. Documentation of flyash disposal is provided in Appendix C.

2.4 Lead-Based Paint Removal, Containerization, Transportation and Disposal

First, loose LBP (i.e., LBP peeling from the walls, ceilings and/or other painted building material, or accumulating on the floor) was removed. Peeling LBP on ceilings and walls was removed using high pressure water spray from a hydro-blaster. Drop cloths or geotextiles were placed under areas of peeling LBP to collect removed material.

The collected paint was containerized in USDOT-approved drums and/or roll-off containers for transportation and off-site disposal in accordance with applicable regulations. Excess water generated by the LBP removal activities was allowed to pass

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through geotextile fabric and drop cloths to filter out paint chip particulates. Upon completion of LBP removal activities, geotextiles and drop cloths were collected, characterized and containerized in USDOT-approved storage drums (e.g., metal, plastic, etc.) for transportation and off-site disposal in accordance with applicable regulations.

Approximately 112,180 pounds of non-TSCA-regulated LBP and 16,350 kilograms of TSCA-regulated LBP were removed and disposed of at CWM Chemical Services, LLC in Model City, New York. Documentation of LBP disposal is provided in Appendix B. Analytical data used for waste characterization are included in Table 3.

On January 25, 2012 and March 16, 2012, in accordance with Paragraph 74(b) of the AOC, IP and GP provided USEPA notification that ARCADIS would conduct supplemental building characterization sampling activities in the CFA and throughout the site, respectively, to identify lead content of paint remaining intact following power-washing activities. As described in the *Supplemental Building Characterization Sampling Report* (SBCSR) (IP et al. 2012), building characterization sampling activities were conducted to provide analytical data to: 1) support on-site reuse of concrete and masonry building materials following demolition of the facility; 2) identify handling, transportation and disposal requirements for building materials prior to and during future demolition; and 3) support preparation of building demolition specifications. USEPA approved the supplemental building characterization sampling activities on January 26, 2012 and March 16, 2012 in electronic correspondence. These building characterization sampling activities were conducted between January 27, 2012 and June 8, 2012 and documented in the SBCSR (IP et al. 2012). The SBCSR is included as Appendix D.

A concentration of 400 milligrams per kilogram (mg/kg) (parts per million [ppm]) for lead (Residential Direct Contact Soil Remediation Standard for total lead [400 ppm] presented in the New Jersey Administrative Code Title 7 Chapter 26D: Remediation Standards [N.J.A.C. 7:26D]) was used as a threshold for the concrete and masonry samples. On painted surfaces with lead concentrations greater than 400 ppm, paint was removed and containerized, and the areas were visually inspected for completeness of paint removal and were deemed acceptable where at least 95 percent of paint appeared to have been removed. Where less than 95 percent removal was observed, additional removal activities were performed and the areas re-inspected. Re-inspected areas were considered acceptable.

It is estimated that over 50 percent of painted concrete and brick surfaces have had 95 percent or more paint removed, and that the remaining adhered paint contains less than 400 ppm lead.

2.5 Asbestos-Containing Materials Abatement, Containerization, Transportation and Disposal

ACM abatement included the removal of identified friable and non-friable ACM, with the exception of certain friable and non-friable ACM described below. ACM were identified in the Building Survey Report (IP et al. 2009a) and the July 2010 Boiler Investigation and Suspect Asbestos Containing Material Sampling letter.

Royal conducted work-zone air monitoring activities pursuant to their site-specific HASP and in accordance with federal, state and local regulations. In addition, IP and GP provided a licensed third party (ARCADIS) to monitor ACM removal activities, complete required clearance air monitoring and conduct perimeter air monitoring during the abatement work. Perimeter air monitoring data are provided in Appendix E. With the exception of CPABA outbuildings, Royal's licensed ACM subcontractor, Indian Arrow Company, performed the removal efforts under the observation of licensed ARCADIS asbestos monitoring personnel. ARCADIS and its subcontractor, LVI Environmental Services, Inc., removed ACM in CPABA outbuildings prior to demolition in 2013.

Based on the *Evaluation of Building Roofs* (Thor Engineering 2010), Royal deemed a portion of the building roofs unsafe for asbestos abatement activities. Friable and non-friable ACM that comprise portions of the roof structure (i.e., roof membrane, felt, flashing, insulated piping on roofs, washers used in conjunction with roofing screws) as well as other friable and non-friable ACM (i.e., caulk, glaze and tar used as sealants on windows or building materials such as corrugated siding) could not be removed from unsafe roofs during PDER activities. Removal of these ACM requires full or partial demolition of building structures and will be addressed during future demolition activities. The affected building areas are shown on Figures 3 and 4.

Royal removed approximately 437 tons of non-friable ACM and 580 tons of friable ACM during pre-demolition activities. ACM was containerized in USDOT-approved containers for transportation and off-site disposal in accordance with applicable regulations. Friable and non-friable ACM were disposed at Conestoga Landfill located in Morgantown, Pennsylvania. Documentation of ACM disposal is provided in Appendix F.

Additional ACM was removed for off-site disposal as part of the CFA demolition activities (mainly from roofing materials which were inaccessible until demolition was completed). The quantities of non-friable and friable ACM removed as part of the CFA demolition work will be reported in the CFA Demolition Project Completion Report to be submitted under separate cover. .

2.6 Galbestos Removal, Containerization, Transportation and Disposal

Galbestos is a type of metal sheeting that is coated with asbestos and contains PCBs. Galbestos was identified after submission of the PDER Work Plan (IP et al. 2010) and included in the RFP.

Approximately 88,207 kilograms of galbestos was removed during this phase of work, containerized in appropriate USDOT-approved containers, and disposed as TSCA-regulated material at Wayne Disposal, Inc. located in Belleville, Michigan in accordance with applicable regulations. Documentation of galbestos disposal is provided in Appendix B.

2.7 Universal Waste Removal, Containerization, Transportation and Disposal

Royal removed universal waste and other regulated or potentially regulated equipment and building appurtenances in accordance with applicable regulations. In total, approximately 32,800 pounds of universal waste was removed among the following universal waste removal activities.

Universal waste removal activities included the following:

2.7.1 Battery Removal

Royal collected batteries, including lead-acid and nickel-cadmium, located in the buildings and exterior areas, and transferred the batteries to a temporary staging area for consolidation and containerization.

Batteries that were leaking were segregated from non-leaking batteries. Batteries were segregated according to type and placed into USDOT-approved waste transportation containers for off-site recycling at AERC Recycling in Allentown, Pennsylvania or disposal at Cycle Chem, Inc. in Elizabeth, New Jersey in accordance with applicable regulations. The quantity of batteries is included under the Universal Waste Heading: "Electronic Waste". Documentation of battery disposal is provided in Appendix G.

2.7.2 Mercury-Containing Devices Removal

Royal removed mercury-containing devices, including thermostats, thermometers and gauges, from the buildings and transferred the items to a temporary staging area for consolidation and containerization. Mercury-containing devices were placed in USDOT-approved containers for off-site recycling or disposal in accordance with applicable regulations. Mercury-containing devices were sent to Cycle Chem Inc. in

Elizabeth, New Jersey for disposal in accordance with applicable regulations or to AERC Recycling in Allentown, Pennsylvania for recycling in accordance with applicable regulations. Documentation of mercury-containing device disposal is provided in Appendix B while documentation of mercury-containing device recycling is provided in Appendix G.

Elemental mercury was observed and removed from a pipe within the basement of Building 58 in July 2011 as part of PDER activities. This elemental mercury was placed in a drum along with other mercury-containing devices and sent to Cycle Chem Inc. in Elizabeth, New Jersey for disposal in accordance with applicable regulations. Although elemental mercury was not visible on the ground, as a precautionary measure, some shallow soil (i.e., about 4 inches) was removed in the area where the pipe containing elemental mercury was found. This soil (i.e., less than 1 cubic yard) was staged with other non-hazardous soil, characterized for waste disposal, and placed into USDOT-approved waste transportation containers. Based on waste classification data, the soil was disposed of offsite as non-hazardous waste to Clean Earth of New Jersey, Inc. in South Kearny, New Jersey Disposal documentation of generated materials is provided in Appendix B.

2.7.3 Lamp Removal

Royal removed mercury-vapor lamps, sodium-vapor lamps and fluorescent lights from light fixtures. The lamps were transferred to a temporary staging area for consolidation and containerization.

Whole lamps were packed in cardboard boxes, fiber drums, steel drums and/or plastic drums, with the openings of the containers secured to prevent breakage of the lamps. Each lamp was segregated and containerized according to type. Crushed or broken lamp waste was packed in USDOT-approved containers with the top of the containers secured prior to shipping. These materials were handled, segregated, and arranged for transportation and off-site disposal at Bethlehem Apparatus Co. in Hellertown, Pennsylvania or AERC Recycling in Allentown, Pennsylvania in accordance with applicable regulations. Disposal documentation is provided in Appendix G.

2.7.4 Light Ballast Removal (Includes Transformers and Capacitors)

As part of lamp removal activities, potential PCB/di(2-ethylhexyl)phthalate (DEHP)-containing light ballasts were collected and transferred to a temporary staging area for consolidation and containerization.

Light ballasts were removed from light fixtures and segregated into two groups: "PCB-containing" and "No PCBs" light ballasts. Unless clearly labeled "No PCBs", the ballasts were assumed to contain PCBs. No leaking ballasts were identified.

Ballasts, transformers and capacitors were placed into USDOT-approved containers prior to off-site transportation and disposal or recycling at CWM Chemical Services, LLC in Model City, New York, AERC Recycling in Allentown, Pennsylvania, or Cycle Chem, Inc. in Elizabeth, New Jersey in accordance with applicable regulations.

Disposal documentation is provided in Appendix G.

2.7.5 Miscellaneous Items Removal

- Fire extinguishers - Fire extinguishers were collected and discharged. The top spray assembly was removed from each cylinder to depressurize the extinguishers. Fire extinguishers were transported for off-site disposal at Cycle Chem, Inc. in Elizabeth, New Jersey in accordance with applicable regulations. Disposal documentation is provided in Appendix B.
- Sprinkler heads - Sprinkler heads were inspected for identifying marks prior to removal. Tyco Fire Products, LP (Tyco), a current manufacturer of sprinkler heads who acquired the brands of sprinkler heads identified at the site, was contacted to opine whether potentially hazardous materials were present in the identified sprinkler heads. No hazardous or regulated materials were identified by Tyco to necessitate specific removal, segregation and disposition action. Less than 50 sprinkler heads were removed and sent offsite for recycling with other scrap metal; the remaining sprinkler heads will be recycled along with the sprinkler system piping and related materials at a later date.
- Electronic waste - Electronic waste (including, but not limited to, computers, monitors with cathode ray tubes, wireless telephones, electronic keyboards, computer mice, televisions, printers, monitors, digital converter boxes, cable or satellite receivers, facsimile machines, and photocopiers) were collected and moved to a temporary on-site staging area (in Building 1). The electronic waste, as well as batteries as noted in Section 2.7.1, was properly segregated and placed into containers. Electronic waste was sent to AERC Recycling in Allentown, Pennsylvania for recycling in accordance with applicable regulations. Disposal documentation is provided in Appendix G.
- Smoke detectors – No smoke detectors were present in the buildings that were addressed by PDER activities.

- EXIT signs - EXIT signs were assessed to identify whether the sign contained (or was suspected to contain) radioactive material (e.g., tritium gas). Royal and LNS observed no EXIT signs that were suspected to contain radioactive gas based on sign markings. EXIT sign batteries and lights were removed carefully to prevent breakage, placed into properly labeled USDOT-approved containers, and transported for off-site disposal in accordance with applicable federal, state and local regulations. The quantity of the waste stream of exit sign batteries and lights was included under the Universal Waste Headings: "Battery Removal" and "Lamp Removal".
- Containerized chemicals - Containerized chemicals (i.e., propane tanks, chemical spray bottles, pressurized cylinders, welding tanks and others) were collected and moved to a temporary on-site staging area in Building 1. The containerized chemicals were field-characterized to identify compatibility and proper disposal requirements, as specified in USDOT chemical compatibility guidelines contained in 49 CFR Parts 173 through 178. The containerized chemicals were segregated and placed into USDOT-approved containers, based on field characterization/compatibility results. Containerized chemicals were transported for off-site disposal at Cycle Chem, Inc. in Elizabeth, New Jersey in accordance with applicable regulations. Disposal documentation is provided in Appendix B.
- Refrigerant-containing equipment - Non-roof-mounted refrigerant-containing equipment was disconnected, and refrigerants evacuated by Interstate Refrigerant Recovery, Inc in accordance with 40 CFR Part 82.161 (Protection of Stratospheric Ozone) and applicable regulations. Refrigerants were evacuated using certified recovery equipment. Following refrigerant recovery, each piece of equipment was labeled as refrigerant-free and set aside for recycling as metal scrap. Removed refrigerants were transported for off-site disposal at Cycle Chem, Inc. in Elizabeth, New Jersey in accordance with applicable regulations. Due to the overall structural condition of the building roofs, removal of refrigerant-containing materials located on the building roofs will occur during future demolition activities. The affected buildings are shown on Figure 3. Disposal documentation is provided in Appendix B.

2.8 Process Piping Decommissioning

Process piping decommissioning included: deactivating, breaking, disconnecting/cutting, ventilating, and draining above-slab process piping. Royal drained, collected and containerized residual liquids/debris contained in the piping for characterization prior to off-site disposal. Piping not decommissioned as part of this

work included: piping associated with public/municipal utilities at the site or process/utility piping that is below-slab or below-grade. Disconnection/cutting of public/municipal utilities and below-slab/grade piping will be addressed as part of future demolition activities.

Liquids/residuals were collected and staged by Royal in USDOT-approved containers for characterization, transportation and off-site disposal in accordance with applicable regulations. Waste characterization activities were performed by ARCADIS. The total quantity of liquids/residuals associated with process piping is included in the 1,150 gallons of equipment oil removed (Section 2.1).

2.9 Additional Pre-Demolition Activities

PCB-impacted concrete identified from PCB analytical data obtained from concrete/masonry samples collected in Buildings 21 and 58 (described in the SBCSR [IP et al. 2012]) was removed in conjunction with PDER activities. Documentation of PCB-impacted concrete disposal is provided in Appendix H.

2.9.1 Building 21 Partial Concrete Slab Scarification

Total PCB concentrations from concrete slab samples obtained during supplemental building characterization activities ranged from 0.101 ppm to 39.8 ppm for locations in Building 21. Total PCB analytical results (as provided in the SBCSR [IP et al. 2012]) are included in Table 4.

PCB-impacted concrete was removed via scarification by LNS from January 16, 2012 through January 26, 2012. The impacted portion of slab was removed to the extent of the nearest sample location with total PCB analytical results below 10 ppm both laterally and with respect to depth below the surface of the concrete. The 10 ppm threshold complies with 40 CFR 761.61(a)(7), which specifies that PCB remediation waste between 1 and 10 ppm can be left in-place or remain onsite as long as the material is spread to uniform thickness and has an appropriate cap in-place. Proposed future placement of concrete materials will be addressed in a Certificate of Authority to Operate a Beneficial Use Project Permit Equivalency Application. Approximately 1,600 pounds of concrete were removed via scarification and disposed of at Clean Earth of New Jersey, Inc. in South Kearny, New Jersey. Extent of concrete removal is shown on Figure 5.

2.9.2 Building 58 Partial Concrete Slab Scarification and Removal

Total PCB concentrations from concrete slab samples obtained during supplemental building characterization activities ranged from non-detect (ND) to 8,400 ppm. Total PCB analytical results (as provided in the SBCSR [IP et al. 2012]) are included in Table 4.

PCB-impacted concrete was removed via scarification by LNS on February 14, 2013. The impacted portion of the slab was removed to the extent of the nearest sample location with total PCB analytical results below 10 ppm both laterally and with respect to depth below the surface of the concrete slab. In the area where the concrete was impacted to a depth greater than 1.5 inches, the full depth of the slab was removed. The 10 ppm threshold complies with 40 CFR 761.61(a)(7), which specifies that PCB remediation waste between 1 and 10 ppm can be left in-place or remain onsite as long as the material is spread to uniform thickness and has an appropriate cap in-place. Proposed future placement of concrete materials will be addressed in a Certificate of Authority to Operate a Beneficial Use Project Permit Equivalency Application. Approximately 5,718 kilograms of concrete were removed via scarification and disposed of at Wayne Disposal, Inc. located in Belleville, Michigan. Extent of concrete removal is shown on Figure 5.

2.9.3 Soil Pile Removal

A pile of soil, brick and building debris (soil pile) generated prior to and as part of PDER activities was staged in an area west of the MMA buildings. Characterization data indicated that the soil pile contained ACM. Approximately 198 tons of soil/brick/debris/ACM was containerized in USDOT-approved containers and disposed at GROWS Landfill located in Tullytown, Pennsylvania in accordance with applicable regulations. Documentation of this soil pile disposal is provided in Appendix F.

2.10 Waste Management

As described in the preceding sections, PDER activities generated waste streams requiring off-site disposal and/or recycling, with a summary of all waste requiring off-site disposal or recycling presented in Table 1. Disposal documentation, including hazardous and non-hazardous bills of lading for the material disposed as part of PDER activities, are found in Appendices B, C, F, G, and H. Although not considered a waste stream, scrap metal sent offsite during PDER activities for recycling is documented herein. Scrap metal sent offsite for recycling was sent to Sims Metal Management in Newark, New Jersey. Approximately 321 tons of metal was sent offsite for recycling. Documentation is provided in Appendix I.

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Curtis Specialty Papers Site
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3. Summary

PDER activities were performed in accordance with the USEPA-approved PDER Work Plan (IP et al. 2010) with additional materials identified after submittal of the work plan (i.e., galbestos) also included, and with procedures outlined in January 25, 2012 and March 16, 2012 notifications. PDER activities complied with federal, state and local regulations, including Title 29 CFR (OSHA regulations) and Title 40 CFR (Protection of the Environment [USEPA] regulations), and enabling sections of the AOC and AOC Amendment No. 1.

Certain tasks (i.e., asbestos removal from piping on the roof and other inaccessible areas, flyash removal from the hopper, and refrigerant removal from the roof) remain due to structural issues with building roofs. These tasks will be completed during future demolition activities.

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Milford, New Jersey

4. References

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Tables

TABLE 1. PRE-DEMOLITION ENVIRONMENTAL REMOVALS WASTE SUMMARY
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Date	Content Description	Drum ID	Classification / Shipping Name	TSCA / Non-TSCA	RCRA Hazardous / Non-Hazardous	Manifest Number	Waste Hauler	Truck Number	Disposal Facility	Quantity	Unit	Appendix
8/11/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453132	Freehold Cartage, Inc	626	Conestoga Landfill	13.22	Ton	F
8/12/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453133	Freehold Cartage, Inc	652	Conestoga Landfill	8.35	Ton	F
8/12/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453134	Freehold Cartage, Inc	626	Conestoga Landfill	10.67	Ton	F
8/15/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453135	Freehold Cartage, Inc	626	Conestoga Landfill	9.22	Ton	F
8/24/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453136	Freehold Cartage, Inc	652	Conestoga Landfill	15.82	Ton	F
8/25/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453137	Freehold Cartage, Inc	652	Conestoga Landfill	7.22	Ton	F
8/26/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453138	Freehold Cartage, Inc	652	Conestoga Landfill	10.48	Ton	F
9/1/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453139	Freehold Cartage, Inc	652	Conestoga Landfill	9.24	Ton	F
9/2/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453140	Freehold Cartage, Inc	652	Conestoga Landfill	8.39	Ton	F
9/6/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453141	Freehold Cartage, Inc	652	Conestoga Landfill	13.61	Ton	F
9/7/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453142	Freehold Cartage, Inc	765	Conestoga Landfill	13.29	Ton	F
9/8/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453143	Freehold Cartage, Inc	765	Conestoga Landfill	14.42	Ton	F
9/14/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	1	SIMS Trucking	C-60-151	SIMS Management	7.95	Ton	I
9/14/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	2	SIMS Trucking	C-45-424	SIMS Management	10.54	Ton	I
9/14/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453144	Freehold Cartage, Inc	766	Conestoga Landfill	14.86	Ton	F
9/21/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453145	Freehold Cartage, Inc	741	Conestoga Landfill	13.96	Ton	F
9/22/2011	White Powder	NA	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	CEI308000063742	Freehold Cartage, Inc		Clean Earth	3.49	Ton	B
9/23/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453146	Freehold Cartage, Inc	741	Conestoga Landfill	14.64	Ton	F
9/23/2011	Drill Cuttings	NA	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	CEI308000063743	Freehold Cartage, Inc		Clean Earth	3.56	Ton	B
9/26/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	3	SIMS Trucking	C-60-798	SIMS Management	9.20	Ton	I
9/26/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453147	Freehold Cartage, Inc	607	Conestoga Landfill	10.74	Ton	F
9/28/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453148	Freehold Cartage, Inc	741	Conestoga Landfill	12.17	Ton	F
9/30/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	4	SIMS Trucking	C-45-3080	SIMS Management	4.40	Ton	I
10/4/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	5	SIMS Trucking	C-45-93	SIMS Management	8.16	Ton	I
10/4/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	6	SIMS Trucking	C-60-149	SIMS Management	8.46	Ton	I
10/7/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453149	Freehold Cartage, Inc	741	Conestoga Landfill	18.52	Ton	F
10/10/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	7	SIMS Trucking	C-60-797	SIMS Management	11.32	Ton	I
10/10/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	8	SIMS Trucking	C-45-93	SIMS Management	8.46	Ton	I
10/12/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453151	Freehold Cartage, Inc	741	Conestoga Landfill	13.39	Ton	F
10/13/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453152	Freehold Cartage, Inc	741	Conestoga Landfill	14.73	Ton	F

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10/14/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453153	Freehold Cartage, Inc	741	Conestoga Landfill	15.93	Ton	F
10/19/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	9	SIMS Trucking	C-45-93	SIMS Management	6.99	Ton	I
10/25/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	10	SIMS Trucking	C-45-87	SIMS Management	4.14	Ton	I
10/25/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	11	SIMS Trucking	C-60-45	SIMS Management	1.96	Ton	I
10/27/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453154	Freehold Cartage, Inc	741	Conestoga Landfill	17.03	Ton	F
10/28/2011	#2 Heating Oil Liquid	CP-DM-0017	RQ Hazardous Waste Liquid, NOS, 9, NA3082, PGIII (Lead Benzene)	Non-TSCA	Hazardous	008928209JJK	Auchter Industrial Vac Service Inc.		Clean Earth	55	Gal	B
10/28/2011	System Brite 10 Solids	CP-DM-0132	RQ Waste Corrosive Solid, NOS, 8, UN1759, PG II (Sodium Hydroxide, Potassium Hydroxide)	Non-TSCA	Hazardous	008928209JJK	Auchter Industrial Vac Service Inc.		Clean Earth	100	Lb	B
10/28/2011	Sodium Hydroxide Solid	CP-DM-0144	RQ Waste Sodium Hydroxide Solid, 8, UN1822, PG II	Non-TSCA	Hazardous	008928209JJK	Auchter Industrial Vac Service Inc.		Clean Earth	300	Lb	B
10/31/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	12	SIMS Trucking	C-45-93	SIMS Management	10.41	Ton	I
11/3/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	13	SIMS Trucking	C-60-149	SIMS Management	9.74	Ton	I
11/8/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	14	SIMS Trucking	C-45-108	SIMS Management	13.18	Ton	I
11/9/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453155	Freehold Cartage, Inc	765	Conestoga Landfill	14.07	Ton	F
11/9/2011	Paint Chips	NA	Non-RCRA, Non-Regulated Solids (paint chips)	Non-TSCA	Non-Hazardous	CP-PC-001	Freehold Cartage, Inc	639	Model City	6.06	Ton	B
11/15/2011	Light ballasts (PCB and non-PCB), Transformers, Capacitors	CP-DM-0019, CP-DM-0026, CP-DM-0027, CP-DM-0028, CP-DM-0029, CP-DM-0030, CP-DM-0031, CP-DM-0032, CP-DM-0033, CP-DM-0034, CP-DM-0035, CP-DM-0036, CP-DM-0107, CP-BX-0146, CP-DM-0167, CP-DM-0168, CP-DM-0185	Rq, Polychlorinated, Biphenyls, Solid, Mixture, 9, UN3432	TSCA	Hazardous	007356844JJK	Price Trucking		Model City	6,733	Kg	G

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Date	Content Description	Drum ID	Classification / Shipping Name	TSCA / Non-TSCA	RCRA Hazardous / Non-Hazardous	Manifest Number	Waste Hauler	Truck Number	Disposal Facility	Quantity	Unit	Appendix
11/15/2011	Paint Chips	CP-DM-0020, CP-DM-0022, CP-DM-0023, CP-DM-0024, CP-DM-0025, CP-DM-0095, CP-DM-0096, CP-DM-0097, CP-DM-0098, CP-DM-0099, CP-DM-0100, CP-DM-0101, CP-DM-0102, CP-DM-0103, CP-DM-0104, CP-DM-0105, CP-DM-0106, CP-DM-0108, CP-DM-0158, CP-DM-0159	Non RCRA Hazardous, Non Regulated Solid (Paint Chips)	Non-TSCA	Non-Hazardous	111611A	Price Trucking	643	Model City	12,000	Lb	B
11/18/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453156	Freehold Cartage, Inc	765	Conestoga Landfill	16.58	Ton	F
11/21/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	15	SIMS Trucking	C-45-60	SIMS Management	12.41	Ton	I
11/23/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	16	SIMS Trucking	C-60-796	SIMS Management	6.97	Ton	I
11/23/2011	Paint Chips	NA	Non-RCRA Hazardous, Non-Regulated Solid (Paint Chips)	Non-TSCA	Non-Hazardous	CP-PC-0002	Freehold Cartage, Inc	607	Model City	7.78	Ton	B
11/28/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	17	SIMS Trucking	M-7	SIMS Management	7.55	Ton	I
11/28/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	18	SIMS Trucking	C-60-795	SIMS Management	8.97	Ton	I
11/28/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	19	SIMS Trucking	C-60-149	SIMS Management	8.77	Ton	I
11/28/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453158	Freehold Cartage, Inc	626	Conestoga Landfill	10.24	Ton	F
11/30/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453159	Freehold Cartage, Inc	765	Conestoga Landfill	13.99	Ton	F
11/30/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453160	Freehold Cartage, Inc	639	Conestoga Landfill	10.04	Ton	F
11/30/2011	Paint Chips	NA	Rq, Polychlorinated, Biphenyls, Solid, Mixture, 9, UN3432	TSCA	Hazardous	007356860JJK	Freehold Cartage, Inc	639	Model City	11,231	Kg	B
12/5/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	20	SIMS Trucking	C-45-404	SIMS Management	8.57	Ton	I
12/6/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	21	SIMS Trucking	C-60-101	SIMS Management	9.73	Ton	I
12/6/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453161	Freehold Cartage, Inc	652	Conestoga Landfill	19.06	Ton	F
12/6/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453162	Freehold Cartage, Inc	785	Conestoga Landfill	23.46	Ton	F
12/7/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453163	Freehold Cartage, Inc	760	Conestoga Landfill	18.16	Ton	F
12/9/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453164	Freehold Cartage, Inc	652	Conestoga Landfill	19.45	Ton	F
12/14/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	22	SIMS Trucking	C-60-797	SIMS Management	9.39	Ton	I
12/14/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	23	SIMS Trucking	C-T1MCZI	SIMS Management	8.70	Ton	I
12/14/2011	Paint Chips	NA	Non-RCRA Hazardous, Non-Regulated Solid (Paint Chips)	Non-TSCA	Non-Hazardous	CP-PC-0003	Freehold Cartage, Inc	607	Model City	14.14	Ton	B
12/15/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	24	SIMS Trucking	C-45-87	SIMS Management	11.27	Ton	I
12/15/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	25	SIMS Trucking	C-45-797	SIMS Management	7.56	Ton	I

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12/15/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453165	Freehold Cartage, Inc	762	Conestoga Landfill	17.44	Ton	F
12/15/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453166	Freehold Cartage, Inc	760	Conestoga Landfill	19.66	Ton	F
12/16/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453167	Freehold Cartage, Inc	760	Conestoga Landfill	18.42	Ton	F
12/16/2011	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1810	Freehold Cartage, Inc	762	Conestoga Landfill	12.43	Ton	C
12/19/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	26	SIMS Trucking	C-60-149	SIMS Management	11.38	Ton	I
12/19/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	27	SIMS Trucking	C-45-101	SIMS Management	9.37	Ton	I
12/19/2011	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453169	Freehold Cartage, Inc	760	Conestoga Landfill	11.99	Ton	F
12/20/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453170	Freehold Cartage, Inc	760	Conestoga Landfill	6.5	Ton	F
12/20/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453231	Freehold Cartage, Inc	765	Conestoga Landfill	11.93	Ton	F
12/21/2011	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453231	Freehold Cartage, Inc		Conestoga Landfill	11.93	Ton	F
12/22/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	28	SIMS Trucking	C-60-797	SIMS Management	4.60	Ton	I
12/22/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	29	SIMS Trucking	C-45-102	SIMS Management	8.72	Ton	I
12/28/2011	Recyclable Metal	NA	Recyclable Metal	NA	NA	30	SIMS Trucking	C-60-149	SIMS Management	9.72	Ton	I
12/30/2011	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1811	Freehold Cartage, Inc	639	Conestoga Landfill	18.24	Ton	C
1/4/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	31	SIMS Trucking	C-45-159	SIMS Management	8.51	Ton	I
1/4/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1812	Freehold Cartage, Inc	639	Conestoga Landfill	12.36	Ton	C
1/4/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1813	Freehold Cartage, Inc	607	Conestoga Landfill	12.53	Ton	C
1/5/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	32	SIMS Trucking	C-45-87	SIMS Management	7.19	Ton	I
1/5/2012	Clay/Soil	NA	Non Regulated Material ID26	Non-TSCA	Non-Hazardous	CEI308000069619	Freehold Cartage, Inc		Clean Earth	8.15	Ton	B
1/5/2012	Activated Carbon	NA	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	CEI308000069620	Freehold Cartage, Inc	607	Clean Earth	6.89	Ton	B
1/6/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1815	Freehold Cartage, Inc	639	Conestoga Landfill	10.15	Ton	C
1/9/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	33	SIMS Trucking	C-45-200	SIMS Management	6.95	Ton	I
1/9/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	34	SIMS Trucking	C-45-92	SIMS Management	10.59	Ton	I
1/9/2012	Alum	CP-DM-0137, CP-DM-0138, CP-DM-0141, CP-DM-0166	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	1200	Lb	B
1/9/2012	Blade Scour Solids	CP-DM-0130, CP-DM-0131	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	800	Lb	B
1/9/2012	BLDG-54 AST Solid Waste	CP-DM-0200	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	500	Lb	B
1/9/2012	BMA 9	CP-DM-0135, CP-DM-0136, CP-DM-0142	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	1500	Lb	B
1/9/2012	Kymene Solids	CP-DM-0143	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	300	Lb	B
1/9/2012	Miscellaneous Dirt	CP-DM-0156, CP-DM-0157	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	800	Lb	B

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MILFORD, NEW JERSEY

Date	Content Description	Drum ID	Classification / Shipping Name	TSCA / Non-TSCA	RCRA Hazardous / Non-Hazardous	Manifest Number	Waste Hauler	Truck Number	Disposal Facility	Quantity	Unit	Appendix
1/9/2012	Scotchban residual solids	CP-DM-0139, CP-DM-0140	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	800	Lb	B
1/9/2012	Sediment	CP-DM-0120, CP-DM-0121	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	600	Lb	B
1/9/2012	Soil, Stone	CP-DM-0169	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	400	Lb	B
1/9/2012	Solvent Absorbent	CP-DM-0133	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	300	Lb	B
1/9/2012	Depress PM 150	CP-DM-0176, CP-DM-0177, CP-DM-0178, CP-DM-0179, CP-DM-0183	Non Regulated Material ID72	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	275	Gal	B
1/9/2012	Liquid Detergent (Plasmin)	CP-DM-0165, CP-DM-0171	Non Regulated Material ID72	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	110	Gal	B
1/9/2012	Liquid Paint, Yellow Dye	CP-DM-0170, CP-DM-0174	Non Regulated Material ID72	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	110	Gal	B
1/9/2012	Paper mill water based cleaning solution	CP-DM-0001, CP-DM-0002, CP-DM-0012	Non Regulated Material ID72	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	165	Gal	B
1/9/2012	Pneumatic oil & water & oil solids	CP-DM-0015, CP-DM-0016	Non Regulated Material ID72	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	110	Gal	B
1/9/2012	Water and blue dye	CP-DM-0145	Non Regulated Material ID72	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	55	Gal	B
1/9/2012	Kymene Liquid	CP-DM-0175	RQ Hazardous Waste Liquid NOS 9, NA3082 PGIII	Non-TSCA	Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	55	Gal	B
1/9/2012	Oil Basement Spill	CP-DM-0134	RQ Hazardous Waste Liquid NOS 9, NA3082 PGIII	Non-TSCA	Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	55	Gal	B
1/9/2012	Waste Oil	CP-DM-0204, CP-DM-0205	RQ Hazardous Waste Liquid NOS 9, NA3082 PGIII	Non-TSCA	Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	110	Gal	B
1/9/2012	Spill Debris	CP-DM-0009	RQ Waste Polychlorinated Biphenyls Solid 9 UN 3432 PG II	Non-TSCA	Non-Hazardous	008927432JJK	Auchter Industrial Vac Service Inc.		Clean Earth	55	Lb	B
1/9/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1816	Freehold Cartage, Inc	639	Conestoga Landfill	7.3	Ton	C
1/10/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1817	Freehold Cartage, Inc	639	Conestoga Landfill	1.61	Ton	C
1/11/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1818	Freehold Cartage, Inc	639	Conestoga Landfill	12.46	Ton	C
1/11/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1819	Freehold Cartage, Inc	626	Conestoga Landfill	11.93	Ton	C
1/12/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	35	SIMS Trucking	C-45-620	SIMS Management	8.55	Ton	I
1/12/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	36	SIMS Trucking	C-45-162	SIMS Management	6.80	Ton	I
1/13/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	37	SIMS Trucking	C-45-620	SIMS Management	7.62	Ton	I
1/13/2012	Corrosive unknown liquid	ASTs Bldg105	RQ Waste Corrosive Liquid, basic, inorganic NOS (EPA 0002) 8 UN3266 PGIII	Non-TSCA	Hazardous	008927490JJK	Auchter Industrial Vac Service Inc.		Clean Earth	2393	Gal	B
1/14/2012	Recyclable Metal	NA	Recyclable Metal	NA	NA	38	SIMS Trucking	C-45-409	SIMS Management	6.04	Ton	I

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1/16/2012	Galbestos	NA	Environmentally Hazardous Substance, NOS, (Asbestos, PCBs), UN3077, PG III	TSCA	Non-Hazardous	CP-GAL-001	Freehold Cartage, Inc		Wayne Disposal	18,200	Est. Kg	B
1/16/2012	Galbestos	NA	Environmentally Hazardous Substance, NOS, (Asbestos, PCBs), UN3077, PG III	TSCA	Non-Hazardous	CP-GAL-002	Freehold Cartage, Inc		Wayne Disposal	18,200	Est. Kg	B
1/18/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453227	Freehold Cartage, Inc	765	Conestoga Landfill	9.85	Ton	F
1/19/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453228	Freehold Cartage, Inc	765	Conestoga Landfill	9.57	Ton	F
1/20/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453229	Freehold Cartage, Inc	652	Conestoga Landfill	8.65	Ton	F
1/23/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1820	Freehold Cartage, Inc	762	Conestoga Landfill	13.27	Ton	C
1/24/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1833	Freehold Cartage, Inc	639	Conestoga Landfill	13.2	Ton	C
1/24/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1834	Freehold Cartage, Inc	626	Conestoga Landfill	12.51	Ton	C
1/25/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453226	Freehold Cartage, Inc	762	Conestoga Landfill	6.75	Ton	F
1/25/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453230	Freehold Cartage, Inc	704	Conestoga Landfill	6.4	Ton	F
1/26/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1832	Freehold Cartage, Inc	762	Conestoga Landfill	12.91	Ton	C
1/27/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453224	Freehold Cartage, Inc	652	Conestoga Landfill	5.66	Ton	F
1/27/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453225	Freehold Cartage, Inc	639	Conestoga Landfill	6	Ton	F
1/27/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453225	Freehold Cartage, Inc		Conestoga Landfill	6	Ton	F
1/31/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453223	Freehold Cartage, Inc	639	Conestoga Landfill	5.7	Ton	F
1/31/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1831	Freehold Cartage, Inc	607	Conestoga Landfill	12.25	Ton	C
2/3/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453222	Freehold Cartage, Inc	652	Conestoga Landfill	9.12	Ton	F
2/3/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1821	Freehold Cartage, Inc	643	Conestoga Landfill	12.61	Ton	C
2/3/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1822	Freehold Cartage, Inc	626	Conestoga Landfill	14.85	Ton	C
2/8/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453219	Freehold Cartage, Inc	766	Conestoga Landfill	10.78	Ton	F
2/8/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453220	Freehold Cartage, Inc	626	Conestoga Landfill	20.33	Ton	F
2/8/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453221	Freehold Cartage, Inc	760	Conestoga Landfill	17.58	Ton	F
2/9/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453218	United trucking		Conestoga Landfill	15	Est. Ton	F
2/9/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1830	Freehold Cartage, Inc	652	Conestoga Landfill	17.46	Ton	C

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2/10/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453217	Freehold Cartage, Inc	626	Conestoga Landfill	10.08	Ton	F
2/10/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1829	Freehold Cartage, Inc	607	Conestoga Landfill	13.75	Ton	C
2/13/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1828	Freehold Cartage, Inc	626	Conestoga Landfill	17.96	Ton	C
2/14/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453215	Freehold Cartage, Inc	705	Conestoga Landfill	8.6	Ton	F
2/14/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453216	Freehold Cartage, Inc	626	Conestoga Landfill	6.6	Ton	F
2/14/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1827	Freehold Cartage, Inc	704	Conestoga Landfill	11.86	Ton	C
2/16/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453214	Freehold Cartage, Inc	652	Conestoga Landfill	4.87	Ton	F
2/16/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1823	Freehold Cartage, Inc	626	Conestoga Landfill	12.95	Ton	C
2/21/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453213	Freehold Cartage, Inc	652	Conestoga Landfill	11.93	Ton	F
2/21/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1824	Freehold Cartage, Inc	626	Conestoga Landfill	12.22	Ton	C
2/22/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453211	Freehold Cartage, Inc	626	Conestoga Landfill	8.66	Ton	F
2/22/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453212	Freehold Cartage, Inc	652	Conestoga Landfill	9.26	Ton	F
2/23/2012	Absorbent Pads	CP-DM-0164, CP-DM-0172, CP-DM-0210	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008930052JJK	Auchter Industrial Vac Service Inc.		Clean Earth	900	Lb	B
2/23/2012	Tank bottoms - rubber cement like	CP-DM-0211	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008930052JJK	Auchter Industrial Vac Service Inc.		Clean Earth	400	Lb	B
2/23/2012	Antifreeze	CP-DM-0201, CP-DM-0203	Non Regulated Material ID72	Non-TSCA	Non-Hazardous	008930052JJK	Auchter Industrial Vac Service Inc.		Clean Earth	110	Gal	B
2/23/2012	Oil Collection	CP-DM-0207, CP-DM-0208, CP-DM-0209	RQ Hazardous Waste Liquid, NOS (EPA D012) 9 NA3082 Endrin PG III	Non-TSCA	Hazardous	008930052JJK	Auchter Industrial Vac Service Inc.		Clean Earth	165	Gal	B
2/27/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453210	Freehold Cartage, Inc	704	Conestoga Landfill	6.57	Ton	F
2/27/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-1825	Freehold Cartage, Inc	626	Conestoga Landfill	15.88	Ton	C
3/6/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453209	Freehold Cartage, Inc	652	Conestoga Landfill	5.6	Ton	F
3/7/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453208	Freehold Cartage, Inc	704	Conestoga Landfill	6.86	Ton	F
3/7/2012	Fly Ash	NA	Fly Ash (Coal)	Non-TSCA	Non-Hazardous	5081-04962	Freehold Cartage, Inc	652	Conestoga Landfill	13.23	Ton	C
3/15/2012	Paint Chips	NA	Non-RCRA Hazardous, Non-Regulated Solid (Paint Chips)	Non-TSCA	Non-Hazardous	CP-PC-0004	Freehold Cartage, Inc	896	Model City	8.12	Ton	B
3/16/2012	Solid Lead Paint Waste	NA	RQ Hazardous Waste Solid, NOS, (Lead), 9, UN3077, PG III	Non-TSCA	Hazardous	007356806JJK	Freehold Cartage, Inc		CWM Chemical	9.19	Ton	B

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3/23/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	0453201	Freehold Cartage, Inc	704	Conestoga Landfill	7.92	Ton	F
3/26/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453199	Freehold Cartage, Inc	704	Conestoga Landfill	7.23	Ton	F
3/26/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453200	Freehold Cartage, Inc	652	Conestoga Landfill	9.4	Ton	F
3/27/2012	Galbestos	NA	Environmentally Hazardous Substance, NOS, (Asbestos, PCBs), UN3077, PG III	TSCA	Non-Hazardous	CP-GAL-003	Freehold Cartage, Inc		Wayne Disposal	19,100	Est. Kg	B
3/27/2012	Galbestos	NA	Environmentally Hazardous Substance, NOS, (Asbestos, PCBs), UN3077, PG III	TSCA	Non-Hazardous	CP-GAL-003	Freehold Cartage, Inc		Wayne Disposal	19,100	Est. Kg	B
3/29/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453197	Freehold Cartage, Inc	652	Conestoga Landfill	8.38	Ton	F
3/29/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453198	Freehold Cartage, Inc	625	Conestoga Landfill	10.47	Ton	F
5/9/2012	Oils from basement 10 and transformer oils (roof)	CP-DM-0238, CP-DM-0239	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008971658JJK	Auchter Industrial Vac Service Inc.		Clean Earth	600	Gal	B
5/9/2012	Unknown gel/soil mixture from Bldg-19	CP-DM-0219, CP-DM-0220, CP-DM-0221	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008971658JJK	Auchter Industrial Vac Service Inc.		Clean Earth	800	Lb	B
5/9/2012	White powder material from poly tank	CP-DM-0212, CP-DM-0213	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	008971658JJK	Auchter Industrial Vac Service Inc.		Clean Earth	1600	Lb	B
5/9/2012	Fuel Oil	CP-DM-0243	RQ UN 1993 Waste Flammable Liquid NOS 3 PG III (Benzene, Tetrachlorethane)	Non-TSCA	Hazardous	008971658JJK	Auchter Industrial Vac Service Inc.		Clean Earth	55	Gal	B
5/9/2012	Concrete dust and paint chips from PCB cleanup - Bldg 21	CP-DM-0214, CP-DM-0215, CP-DM-0216, CP-DM-0217, CP-DM-0218, CP-DM-0222	RQ Waste Polychlorinated Biphenyls Solid 9 UN 3432 PG II	Non-TSCA	Non-Hazardous	008971658JJK	Auchter Industrial Vac Service Inc.		Clean Earth	1600	Lb	H
5/14/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06984	United Trucking		Conestoga Landfill	7.59	Ton	F
5/14/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06985	United Trucking		Conestoga Landfill	8.28	Ton	F
5/15/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06986	United Trucking		Conestoga Landfill	6.11	Ton	F
5/16/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06987	United Trucking		Conestoga Landfill	6.07	Ton	F
5/16/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06988	United Trucking		Conestoga Landfill	6.52	Ton	F
5/17/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06989	United Trucking		Conestoga Landfill	3.9	Ton	F
5/21/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06990	United Trucking		Conestoga Landfill	5.68	Ton	F
5/21/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06991	United Trucking		Conestoga Landfill	7.36	Ton	F
5/22/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06992	United Trucking		Conestoga Landfill	10.43	Ton	F
5/23/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06993	United Trucking		Conestoga Landfill	5.1	Ton	F
5/23/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06994	United Trucking		Conestoga Landfill	15.86	Ton	F
5/24/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06995	United Trucking		Conestoga Landfill	8.94	Ton	F
5/29/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06996	United Trucking		Conestoga Landfill	4.69	Ton	F
5/30/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06997	United Trucking		Conestoga Landfill	4.72	Ton	F
5/31/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06998	United Trucking		Conestoga Landfill	4.88	Ton	F
6/1/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-06999	United Trucking		Conestoga Landfill	8.48	Ton	F
6/4/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07000	United Trucking		Conestoga Landfill	8.04	Ton	F
6/6/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07001	United Trucking		Conestoga Landfill	8.11	Ton	F

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6/7/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07002	United Trucking		Conestoga Landfill	6.12	Ton	F
6/8/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07003	United trucking	260	Conestoga Landfill	5.49	Ton	F
6/11/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07004	United trucking	260	Conestoga Landfill	5.6	Ton	F
6/13/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07007	United trucking	260	Conestoga Landfill	4.53	Ton	F
6/14/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07008	United trucking	260	Conestoga Landfill	5.02	Ton	F
6/28/2012	Liquid/Water	NA	Non Regulated Material ID27	Non-TSCA	Non-Hazardous	CEI308000077266	Auchter Industrial Vac Service Inc.		Clean Earth	850	Gal	B
7/10/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07010	United trucking		Conestoga Landfill	5.2	Ton	F
7/10/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07011	United trucking		Conestoga Landfill	5.48	Ton	F
7/12/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07012	United trucking	249 T87	Conestoga Landfill	5.83	Ton	F
7/18/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07013	United trucking	260 86	Conestoga Landfill	6.98	Ton	F
7/19/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07014	United trucking	260	Conestoga Landfill	6.58	Ton	F
7/20/2012	Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07015	United trucking	260	Conestoga Landfill	4.34	Ton	F
7/20/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07016	United trucking	260	Conestoga Landfill	6.49	Ton	F
10/18/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-11881	United trucking		Conestoga Landfill	15.29	Ton	F
10/25/2012	Non-Friable Asbestos	NA	Friable Asbestos	Non-TSCA	Non-Hazardous	5081-11872	United trucking		Conestoga Landfill	4.23	Ton	F
10/27/2012	Universal Waste-Lamps	NA	Non Regulated Solid (Universal Waste - Lamps)	Non-TSCA	Non-Hazardous	X01	Freehold Cartage, Inc	749	Bethlehem Apparatus	4400	Lb	G
11/6/2012	Galbestos	NA	Polychlorinated biphenyls, solid, mixture, UN3432, PG III (PCB debris with asbestos [galbestos siding])	TSCA	Non-Hazardous	010343567JJK	Freehold Cartage, Inc	9441 and 9672	Wayne Disposal	13,607	Est. Kg	B
11/12/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	5081-07031	United trucking		Conestoga Landfill	2.54	Ton	F
12/3/2012	Universal Waste-Lamps and Electronic Scrap	NA	Used Spent Electronic Scrap for recycling	Non-TSCA	Non-Hazardous	2623 AERC1	CEMCO		AERC Recycling	300	Lb	G
12/3/2012	Universal Waste-Lamps and Electronic Scrap	CP-BX-0053, CP-BX-0054, CP-BX-0056, CP-BX-0057, CP-BX-0073, CP-BX-0086, CP-BX-0123, CP-BX-0124, CP-BX-0128, CP-BX-0129, CP-BX-0154, CP-BX-0155, CP-BX-0188, CP-BX-0189, CP-BX-0190, CP-BX-0191, CP-BX-0192, CP-BX-0193, CP-BX-0194, CP-BX-0195, CP-BX-0223, CP-BX-0224, CP-BX-0225, CP-BX-0226, CP-BX-0227, CP-BX-0228, CP-BX-0229, CP-BX-0230, CP-BX-0231, CP-BX-0232, CP-BX-0233, CP-BX-0234	Used/Spent fluorescent lamps for recycling	Non-TSCA	Non-Hazardous	2623 AERC1	CEMCO		AERC Recycling	300	Lb	G

TABLE 1. PRE-DEMOLITION ENVIRONMENTAL REMOVALS WASTE SUMMARY
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Date	Content Description	Drum ID	Classification / Shipping Name	TSCA / Non-TSCA	RCRA Hazardous / Non-Hazardous	Manifest Number	Waste Hauler	Truck Number	Disposal Facility	Quantity	Unit	Appendix
12/5/2012	Universal Waste-Electronic Scrap, Wet Batteries, PCB solids, Mercury	CP-DM-0018, CP-DM-0037, CP-DM-0187	UN2794 Batteries, wet, filled with acid, 8, PGII	Non-TSCA	Hazardous	2623 AERC2	CEMCO		AERC Recycling	900	Lb	G
12/5/2012	Universal Waste-Electronic Scrap, Wet Batteries, PCB solids, Mercury	NA	UN2794, Batteries, wet, filled with acid, 8, PGIII (used lead acid batteries for recycling)	Non-TSCA	Hazardous	2623 AERC2	CEMCO		AERC Recycling	6,000	Lb	G
12/5/2012	Universal Waste-Electronic Scrap, Wet Batteries, PCB solids, Mercury	CP-DM-0251	UN2809, Mercury, 8, PGIII (Universal waste for recycling)	Non-TSCA	Hazardous	2623 AERC2	CEMCO		AERC Recycling	200	Lb	G
12/5/2012	Universal Waste-Electronic Scrap, Wet Batteries, PCB solids, Mercury	CP-DM-0186, CP-DM-0196, CP-DM-0202, CP-DM-0206, CP-DM-0240, CP-DM-0241, CP-DM-0242, CP-DM-0250, CP-DM-02	UN3432, Polychlorinated biphenyls, solid (Used PCB Ballasts for recycling)	Non-TSCA	Hazardous	2623 AERC2	CEMCO		AERC Recycling	2,500	Lb	G
12/5/2012	Universal Waste-Electronic Scrap, Wet Batteries, PCB solids, Mercury	NA	Used Spent Electronic Scrap for recycling	Non-TSCA	Non-Hazardous	2623 AERC2	CEMCO		AERC Recycling	6,000	Lb	G
12/19/2012	Non-Friable Asbestos	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	0453168	Freehold Cartage, Inc	634	Conestoga Landfill	13.48	Ton	F
4/18/2013	Waste Aerosols - Lab Pack	CP-DM-0314, CP-DM-0315	UN1950, Waste Aerosols, Flammable, NOS, 2.1	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	175	Lb	G
4/18/2013	Waste Foam Aerosols - Lab Pack	CP-DM-0316	UN1950, Waste Aerosols, Flammable, NOS, 2.1	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	35	Lb	G
4/18/2013	Corrosive liquid (acid), Inorganic - Lab Pack	CP-DM-0318	UN3264, Waste Corrosive Liquid, Acidic, Inorganic, NOS, 8, II	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	52	Lb	G
4/18/2013	Corrosive liquid (basic), Inorganic - Lab Pack	CP-DM-0319	UN3286, Waste Corrosive Liquid, Basic, Inorganic, NOS, 8, II	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	51	Lb	G
4/18/2013	Waste Mercury-contianing Devices - Lab Pack	CP-DM-0323	UN2808, Waste Mercury containing in manufactured articles, 8, III	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	5	Lb	B
4/18/2013	Oxidizing solids - Lab Pack	CP-DM-0321	UN1479, Waste Oxidizing Solid, NOS, 5.1, II	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	4	Lb	G
4/18/2013	Waste Lead Oxide - Lab Pack	CP-DM-0322	UN3285, Waste Toxic Solid, Inorganic, 6.1, II	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	10	Lb	G
4/18/2013	Waste Paint Related Material - Lab Pack	CP-DM-0313	RQ, UN1263, Waste Paint Related Material, 3, II	Non-TSCA	Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	400	Lb	G
4/18/2013	Organic solids (Toxic) - Lab Pack	CP-DM-0320	UN2811, Toxic Solids, Organic, NOS, 6.1, II	Non-TSCA	Non-Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	10	Lb	G

TABLE 1. PRE-DEMOLITION ENVIRONMENTAL REMOVALS WASTE SUMMARY
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Date	Content Description	Drum ID	Classification / Shipping Name	TSCA / Non-TSCA	RCRA Hazardous / Non-Hazardous	Manifest Number	Waste Hauler	Truck Number	Disposal Facility	Quantity	Unit	Appendix
4/18/2013	PCB Ballasts and Capacitors - Lab Pack	CP-DM-0317	RQ, UN3432, Polychlorinated Biphenyls, Solid, 9, II (PCB Ballasts and Capacitors)	TSCA	Non-Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	20	Lb	G
4/18/2013	Lead Acid Batteries - Lab Pack	CP-DM-0324	UN2800, Batteries, Wet Non-Spillable, 8, III	Non-TSCA	Non-Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	1	Lb	G
4/18/2013	Oily debris and containers - Lab Pack	CP-DM-0311	Non RCRA, Non DOT Regulated Solids, NOS	Non-TSCA	Non-Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	130	Lb	G
4/18/2013	40 gal drum inside 55 gal drum with hardened resin - Lab Pack	CP-DM-0312	Non RCRA, Non DOT Regulated Solids, NOS	Non-TSCA	Non-Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	155	Lb	G
4/18/2013	Lab Pack Materials	CP-DM-0308, CP-DM-0309, CP-DM-0310	Non RCRA, Non DOT Regulated Solids, NOS	Non-TSCA	Non-Hazardous	010787661JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	1,222	Lb	G
5/8/2013	Concrete dust, Paint chips	CP-DM-0245	Non-RCRA Hazardous, RQ, UN3432, Polychlorinated Biphenyls, Solid, 9, II (PCB concrete)	TSCA	Non-Hazardous	010787763JJK	Freehold Cartage, Inc		Wayne Disposal	5,718	Kg	H
6/25/2013	AST 105 Liquid Residuals	AST 105	UN1824, Waste Sodium Hydroxide	Non-TSCA	Hazardous	011147730JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	158	Gal	B
7/9/2013	Drum Bottoms	CP-DM-0344	RQ, NA3082, Hazardous Waste, Liquid, NOS, 9, III (Toluene, Xylene)	Non-TSCA	Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	75	Lb	G
7/9/2013	Fire Extinguishers	CP-DM-0338	RQ, UN1044, Waste Fire Extinguishers, 2.2	Non-TSCA	Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	60	Lb	G
7/9/2013	Fire Extinguishers	CP-DM-0336, CP-DM-0337	UN1044, Fire Extinguishers, 2.2	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	160	Lb	G
7/9/2013	Heptafluoropropane Cylinder	CP-DM-0335	UN3296, Heptafluoropropane, 2.2	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	125	Lb	G
7/9/2013	Refrigerant	CP-DM-0340	UN3159, Refrigerant Gas R-134e, 2.2	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	150	Lb	G
7/9/2013	Fire Extinguishers	CP-DM-0339	UN1044, Fire Extinguishers, 2.2	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	200	Lb	G
7/9/2013	Dispersant	CP-DM-0281, CP-DM-0282, CP-DM-0296	Non DOT, Non RCRA Regulated Material (Dispersant)	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	3,200	Lb	G
7/9/2013	Empty Drums	NA	Non DOT, Non RCRA Regulated Material (Empty Drum)	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	500	Lb	G
7/9/2013	Empty Drums	NA	Non DOT, Non RCRA Regulated Material (Empty Drum)	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	665	Lb	G
7/9/2013	Empty Drums	NA	Non DOT, Non RCRA Regulated Material (Empty Drum)	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	200	Lb	G

TABLE 1. PRE-DEMOLITION ENVIRONMENTAL REMOVALS WASTE SUMMARY

CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Date	Content Description	Drum ID	Classification / Shipping Name	TSCA / Non-TSCA	RCRA Hazardous / Non-Hazardous	Manifest Number	Waste Hauler	Truck Number	Disposal Facility	Quantity	Unit	Appendix
7/9/2013	Oil and Residuals from Reservoirs (Elevator, etc.) and Decontamination-related Materials	CP-DM-0235, CP-DM-0236, CP-DM-0237, CP-DM-0244, CP-DM-0258, CP-DM-0259, CP-DM-0297, CP-DM-0298, CP-DM-0299	Non DOT, Non RCRA Regulated Material (Oil, Water)	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	5,000	Lb	G
7/9/2013	Paint Solids, Residuals, Door Closers, Geoprobe Liners, PPE and Decontamination-related Materials	CP-DM-0284, CP-DM-0285, CP-DM-0252, CP-DM-0288, CP-DM-0289, CP-DM-0290, CP-DM-0291, CP-DM-0160, CP-DM-0161, CP-DM-0253, CP-DM-0254, CP-DM-0255, CP-DM-0256, CP-DM-0292, CP-DM-0293, CP-DM-0294, CP-DM-0295, CP-DM-0300, CP-DM-0301, CP-DM-0341, CP-DM-0342, CP-DM-0343	Non DOT, Non RCRA Regulated Material (Spill Cleanup)	Non-TSCA	Non-Hazardous	010787836JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	9,200	Lb	G
7/12/2013	AST 105 Liquid Residuals	AST 105	UN1824, Waste Sodium Hydroxide	Non-TSCA	Hazardous	010787834JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	325	Gal	B
7/12/2013	AST 105 Solid Residuals	AST 105	Non-RCRA Hazardous, UN1824, Waste Sodium Hydroxide,	Non-TSCA	Non-Hazardous	011147980JJK	Freehold Cartage, Inc		Cycle Chem, Inc.	6.07	Ton	B
10/30/2013	Oil	DM-005	RQ, NA3082, Hazardous Waste, Liquid, NOS, 9, II (Trichloroethylene)	Non-TSCA	Hazardous	011147486JJK	Clean Venture		Cycle Chem, Inc.	55	Lb	B
10/30/2013	Grease, Tar	DM-006, DM-007	RQ, UN1993, Waste Flammable Liquid, NOS, 3, II (Mineral Spirits)	Non-TSCA	Hazardous, Non-Hazardous*	011147486JJK	Clean Venture		Cycle Chem, Inc.	110	Lb	B
12/5/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111951	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	25.24	Ton	F
12/5/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111959	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	19.31	Ton	F
12/5/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111958	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	21.24	Ton	F
12/6/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111957	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	16.88	Ton	F
12/6/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111953	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	19.04	Ton	F
12/9/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111954	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	23.34	Ton	F
12/10/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111955	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	19.12	Ton	F

TABLE 1. PRE-DEMOLITION ENVIRONMENTAL REMOVALS WASTE SUMMARY

CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Date	Content Description	Drum ID	Classification / Shipping Name	TSCA / Non-TSCA	RCRA Hazardous / Non-Hazardous	Manifest Number	Waste Hauler	Truck Number	Disposal Facility	Quantity	Unit	Appendix
12/10/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111956	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	17.61	Ton	F
12/11/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111950	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	17.78	Ton	F
12/19/2013	ACM Soil Pile	NA	Non-Friable Asbestos	Non-TSCA	Non-Hazardous	111952	Horwoth Trucking, Inc.		G.R.O.W.S. North Landfill	18.54	Ton	F

TABLE 1. PRE-DEMOLITION ENVIRONMENTAL REMOVALS WASTE SUMMARY

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Notes:

1. Information compiled from waste manifests transported with materials and received by disposal/recycling facility

2. NA = Not Applicable

3. TSCA = Toxic Substances Control Act

4. RCRA = Resource Conservation and Recovery Act

5. Units:

Gal	Gallon
Kg	Kilogram
Lb	Pound
Ton	Ton

6. * Disposal facility identified one of two drums as non-hazardous, as documented in a February 19, 2014 letter from the disposal facility included in Appendix B. The identification of the hazardous and non-hazardous drums was not disclosed by the facility.

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-001L 07/28/11	WC-PDER-002L 07/28/11	WC-PDER-003L 07/28/11	WC-PDER-004S 08/05/11	WC-PDER-005S 08/05/11	WC-PDER-006S 08/05/11	WC-PDER-007S 08/05/11	WC-PDER-008S 08/10/11	WC-PDER-009S 08/10/11	WC-PDER-010S 08/10/11
Barium	mg/L	10 U	1.9	1 U	1 U	1 U	1 U	1 U	NA	NA	NA
Cadmium	mg/L	0.05 U	0.25 U	0.25 U	0.0077	0.005 U	0.005 U	0.005 U	NA	NA	NA
Chromium	mg/L	0.3	1.2	0.5 U	0.012	0.01 U	0.01 U	0.01 U	NA	NA	NA
Copper	mg/L	NA									
Lead	mg/L	5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	NA	NA	NA
Mercury	mg/L	0.00086	0.008 U	0.008 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	NA	NA	NA
Nickel	mg/L	NA									
Selenium	mg/L	5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	NA	NA	NA
Silver	mg/L	0.1 U	0.5 U	0.5 U	0.01 U	0.01 U	0.01 U	0.01 U	NA	NA	NA
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	U	U	U	U	U	U	U	NA	NA	NA
Ignitability	°F	U	100	U	U	U	U	U	NA	NA	NA
pH	SU	10.01	NA								
Reactive Cyanide	mg/kg	10 U	10 U	10 U	12 U	12 U	12 U	12 U	NA	NA	NA
Reactive Sulfide	mg/kg	NA	100 U	100 U	120 U	120 U	120 U	120 U	NA	NA	NA
Reactive Sulfide	mg/L	100 U	NA								
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA									
Ammonia-ASTM Leachate	mg/L	NA									
COD-ASTM Leachate	mg/L	NA									
Solids, Total-ASTM Leachate	mg/L	NA									
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA									
Reactive Cyanide	mg/L	NA									
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-011L 08/10/11	WC-PDER-012S 08/10/11	WC-PDER-013L 08/10/11	WC-PDER-014S 08/11/11	WC-PDER-015S 08/11/11	WC-PDER-016L 08/11/11	WC-PDER-017L 08/11/11	TFC-CL2-001 08/23/11	TFC-CL2-002 08/23/11	TFC-CL2-003 08/23/11
VOCs - TCLP											
1,1-Dichloroethene	mg/L	NA	NA	NA	NA						
1,2-Dichloroethane	mg/L	NA	NA	NA	NA						
1,4-Dichlorobenzene	mg/L	NA	NA	NA	NA						
2-Butanone	mg/L	NA	NA	NA	NA						
Benzene	mg/L	NA	NA	NA	NA						
Carbon Tetrachloride	mg/L	NA	NA	NA	NA						
Chlorobenzene	mg/L	NA	NA	NA	NA						
Chloroform	mg/L	NA	NA	NA	NA						
Tetrachloroethene	mg/L	NA	NA	NA	NA						
Trichloroethene	mg/L	NA	NA	NA	NA						
Vinyl Chloride	mg/L	NA	NA	NA	NA						
SVOCs - TCLP											
1,4-Dichlorobenzene	mg/L	NA	NA	NA	NA						
2,4,5-Trichloropheno	mg/L	NA	NA	NA	NA						
2,4,6-Trichloropheno	mg/L	NA	NA	NA	NA						
2,4-Dinitrotoluene	mg/L	NA	NA	NA	NA						
2-Methylpheno	mg/L	NA	NA	NA	NA						
3&4-Methylpheno	mg/L	NA	NA	NA	NA						
Hexachlorobenzene	mg/L	NA	NA	NA	NA						
Hexachlorobutadiene	mg/L	NA	NA	NA	NA						
Hexachloroethane	mg/L	NA	NA	NA	NA						
Nitrobenzene	mg/L	NA	NA	NA	NA						
Pentachloropheno	mg/L	NA	NA	NA	NA						
Pyridine	mg/L	NA	NA	NA	NA						
PCBs											
Aroclor-1016	mg/kg	1 U	0.053 U	1 U	0.1 U	0.043 U	1 U	1 U	NA	NA	NA
Aroclor-1221	mg/kg	1 U	0.053 U	1 U	0.1 U	0.043 U	1 U	1 U	NA	NA	NA
Aroclor-1232	mg/kg	1 U	0.053 U	1 U	0.1 U	0.043 U	1 U	1 U	NA	NA	NA
Aroclor-1242	mg/kg	1 U	0.053 U	1 U	0.1 U	0.043 U	1 U	1 U	NA	NA	NA
Aroclor-1248	mg/kg	1 U	0.053 U	1 U	0.418	0.922	1 U	1 U	NA	NA	NA
Aroclor-1254	mg/kg	1 U	2.93	1 U	2.72	1.25	1 U	1 U	NA	NA	NA
Aroclor-1260	mg/kg	1 U	0.053 U	1 U	0.1 U	0.043 U	1 U	1 U	NA	NA	NA
Aroclor-1262	mg/kg	1 U	0.053 U	1 U	0.1 U	0.043 U	1 U	1 U	NA	NA	NA
Aroclor-1268	mg/kg	1 U	0.053 U	1 U	0.1 U	0.043 U	1 U	1 U	NA	NA	NA
Total PCBs	mg/kg	ND	2.93	ND	3.138	2.172	ND	ND	NA	NA	NA
PCBs - TCLP											
Aroclor-1016	ug/L	NA	NA	NA	NA						
Aroclor-1221	ug/L	NA	NA	NA	NA						
Aroclor-1232	ug/L	NA	NA	NA	NA						
Aroclor-1242	ug/L	NA	NA	NA	NA						
Aroclor-1248	ug/L	NA	NA	NA	NA						
Aroclor-1254	ug/L	NA	NA	NA	NA						
Aroclor-1260	ug/L	NA	NA	NA	NA						
Aroclor-1262	ug/L	NA	NA	NA	NA						
Aroclor-1268	ug/L	NA	NA	NA	NA						
Pesticides - TCLP											
2,4,5-TP	mg/L	NA	NA	NA	NA						
2,4-D	mg/L	NA	NA	NA	NA						
Endrin	mg/L	NA	NA	NA	NA						
Gamma-BHC (Lindane)	mg/L	NA	NA	NA	NA						
Heptachlor	mg/L	NA	NA	NA	NA						
Heptachlor Epoxide	mg/L	NA	NA	NA	NA						
Methoxychlor	mg/L	NA	NA	NA	NA						
Technical Chlordane	mg/L	NA	NA	NA	NA						
Toxaphene	mg/L	NA	NA	NA	NA						
Metals - TCLP											
Arsenic	mg/L	NA	NA	NA	NA						

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-011L 08/10/11	WC-PDER-012S 08/10/11	WC-PDER-013L 08/10/11	WC-PDER-014S 08/11/11	WC-PDER-015S 08/11/11	WC-PDER-016L 08/11/11	WC-PDER-017L 08/11/11	TFC-CL2-001 08/23/11	TFC-CL2-002 08/23/11	TFC-CL2-003 08/23/11
Barium	mg/L	NA	NA	NA	NA						
Cadmium	mg/L	NA	NA	NA	NA						
Chromium	mg/L	NA	NA	NA	NA						
Copper	mg/L	NA	NA	NA	NA						
Lead	mg/L	NA	NA	NA	NA						
Mercury	mg/L	NA	NA	NA	NA						
Nickel	mg/L	NA	NA	NA	NA						
Selenium	mg/L	NA	NA	NA	NA						
Silver	mg/L	NA	NA	NA	NA						
Zinc	mg/L	NA	NA	NA	NA						
Miscellaneous											
Coliform, Total	col/100ml	NA	80	44	56						
Coliform, Fecal	col/100ml	NA	2	8	8						
Corrosivity	SU	NA	NA	NA	NA						
Ignitability	°F	NA	NA	NA	NA						
pH	SU	NA	NA	NA	NA						
Reactive Cyanide	mg/kg	NA	NA	NA	NA						
Reactive Sulfide	mg/kg	NA	NA	NA	NA						
Reactive Sulfide	mg/L	NA	NA	NA	NA						
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA	NA	NA	NA						
Ammonia-ASTM Leachate	mg/L	NA	NA	NA	NA						
COD-ASTM Leachate	mg/L	NA	NA	NA	NA						
Solids, Total-ASTM Leachate	mg/L	NA	NA	NA	NA						
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA	NA	NA	NA						
Reactive Cyanide	mg/L	NA	NA	NA	NA						
pH, Step 1 TCLP	SU	NA	NA	NA	NA						
pH, TCLP Leachate	SU	NA	NA	NA	NA						
TPH											
HEM Oil and Grease	mg/kg	NA	NA	NA	NA						
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA	NA	NA	NA						

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-018S 08/26/11	WC-PDER-019S 08/26/11	WC-PDER-020S 08/26/11	WC-PDER-021L 08/26/11	WC-PDER-022S 08/26/11	WC-PDER-023S 09/09/11	WC-PDER-024S 09/09/11	WC-PDER-025S 09/09/11	WC-PDER-026S 09/09/11	WC-PDER-027L 09/09/11
Barium	mg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1.2
Cadmium	mg/L	0.005 U	0.0062	0.018	0.77	0.021	0.045	0.025	0.016	0.0091	0.25 U
Chromium	mg/L	0.01 U	0.01 U	0.01 U	0.5 U	0.032	0.01 U	0.69	0.019	0.01 U	0.5 U
Copper	mg/L	NA									
Lead	mg/L	0.5 U	0.5 U	0.5 U	43	0.62	0.5 U	1.6	0.97	0.5 U	1.7
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.008 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.008 U
Nickel	mg/L	NA									
Selenium	mg/L	0.5 U									
Silver	mg/L	0.01 U	0.01 U	0.01 U	0.5 U	0.01 U	0.01 U	0.01 U	0.01 U	0.01 U	0.5 U
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	U	U	U	U	U	U	U	U	U	U
Ignitability	°F	U	U	U	U	U	U	U	U	U	U
pH	SU	NA	6.21								
Reactive Cyanide	mg/kg	13 U	11 U	12 U	10 U	13 U	11 U	13 U	12 U	12 U	28 U
Reactive Sulfide	mg/kg	130 U	110 U	120 U	100 U	130 U	110 U	130 U	120 U	120 U	280 U
Reactive Sulfide	mg/L	NA									
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA									
Ammonia-ASTM Leachate	mg/L	NA									
COD-ASTM Leachate	mg/L	NA									
Solids, Total-ASTM Leachate	mg/L	NA									
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA									
Reactive Cyanide	mg/L	NA									
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-028S 09/09/11	WC-PDER-029L 09/09/11	WC-PDER-030S 09/09/11	WC-PDER-031S 09/09/11	WC-PDER-032S 09/12/11	WC-PDER-033S 09/12/11	WC-PDER-034S 09/12/11	WC-PDER-040S 09/27/11	WC-PDER-051L 10/11/11	WC-PDER-053L 10/11/11
Barium	mg/L	NA	1 U	1 U	2.1	1 U	1 U	1 U	1 U	NA	NA
Cadmium	mg/L	NA	0.025 U	0.005 U	0.005 U	0.05 U	0.005 U	0.025 U	0.005 U	NA	NA
Chromium	mg/L	NA	0.05 U	0.01 U	0.069	0.46	0.27	0.13	0.01 U	NA	NA
Copper	mg/L	NA									
Lead	mg/L	NA	0.5 U	NA	NA						
Mercury	mg/L	NA	0.008 U	0.0008 U	0.0002 U	0.024	0.00051	0.0004 U	0.0002 U	NA	NA
Nickel	mg/L	NA									
Selenium	mg/L	NA	0.5 U	NA	NA						
Silver	mg/L	NA	0.05 U	0.01 U	0.01 U	0.1 U	0.01 U	0.01 U	0.01 U	NA	NA
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	NA	U	U	U	U	U	U	U	NA	NA
Ignitability	°F	NA	U	U	U	U	U	U	U	NA	NA
pH	SU	NA	7.2	NA							
Reactive Cyanide	mg/kg	NA	32 U	20 U	37 U	13 U	20 U	19 U	10 U	NA	NA
Reactive Sulfide	mg/kg	NA	320 U	200 U	370 U	130 U	200 U	190 U	100 U	NA	NA
Reactive Sulfide	mg/L	NA									
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA									
Ammonia-ASTM Leachate	mg/L	NA									
COD-ASTM Leachate	mg/L	NA									
Solids, Total-ASTM Leachate	mg/L	NA									
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA									
Reactive Cyanide	mg/L	NA									
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-062L 10/19/11	WC-PDER-063L 10/27/11	WC-PDER-064L 10/27/11	WC-PDER-065L 10/27/11	WC-PDER-066L 11/03/11	WC-PDER-067L 11/03/11	WC-PDER-068L 11/03/11	WC-PDER-069L 11/03/11	WC-PDER-070L 11/03/11	WC-PDER-071L 11/03/11
VOCs - TCLP											
1,1-Dichloroethene	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
1,2-Dichloroethane	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
1,4-Dichlorobenzene	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
2-Butanone	mg/L	NA	NA	0.1 U	NA	0.4 U	0.1 U	NA	NA	NA	NA
Benzene	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
Carbon Tetrachloride	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
Chlorobenzene	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
Chloroform	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
Tetrachloroethene	mg/L	NA	NA	0.005 U	NA	0.171	0.005 U	NA	NA	NA	NA
Trichloroethene	mg/L	NA	NA	0.005 U	NA	0.02 U	0.005 U	NA	NA	NA	NA
Vinyl Chloride	mg/L	NA	NA	0.025 U	NA	0.1 U	0.025 U	NA	NA	NA	NA
SVOCs - TCLP											
1,4-Dichlorobenzene	mg/L	NA	NA	0.02 U	NA	10 U	0.02 U	NA	NA	NA	NA
2,4,5-Trichloropheno	mg/L	NA	NA	0.05 U	NA	25 U	0.05 U	NA	NA	NA	NA
2,4,6-Trichloropheno	mg/L	NA	NA	0.05 U	NA	25 U	0.05 U	NA	NA	NA	NA
2,4-Dinitrotoluene	mg/L	NA	NA	0.02 U	NA	10 U	0.02 U	NA	NA	NA	NA
2-Methylpheno	mg/L	NA	NA	0.02 U	NA	10 U	0.02 U	NA	NA	NA	NA
3&4-Methylpheno	mg/L	NA	NA	0.02 U	NA	10 U	0.02 U	NA	NA	NA	NA
Hexachlorobenzene	mg/L	NA	NA	0.02 U	NA	10 U	0.02 U	NA	NA	NA	NA
Hexachlorobutadiene	mg/L	NA	NA	0.01 U	NA	5 U	0.01 U	NA	NA	NA	NA
Hexachloroethane	mg/L	NA	NA	0.05 U	NA	25 U	0.05 U	NA	NA	NA	NA
Nitrobenzene	mg/L	NA	NA	0.02 U	NA	10 U	0.02 U	NA	NA	NA	NA
Pentachloropheno	mg/L	NA	NA	0.1 U	NA	50 U	0.1 U	NA	NA	NA	NA
Pyridine	mg/L	NA	NA	0.02 U	NA	10 U	0.02 U	NA	NA	NA	NA
PCBs											
Aroclor-1016	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1221	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1232	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1242	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1248	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1254	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1260	mg/kg	5.86	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1262	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Aroclor-1268	mg/kg	1 U	1 U	NA	1 U	1 U	NA	0.5 U	0.5 U	0.5 U	0.5 U
Total PCBs	mg/kg	5.86	ND								
PCBs - TCLP											
Aroclor-1016	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1221	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1232	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1242	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1248	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1254	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1260	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1262	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Aroclor-1268	ug/L	NA	NA	10 U	NA	NA	10 U	NA	NA	NA	NA
Pesticides - TCLP											
2,4,5-TP	mg/L	NA	NA	0.0437	NA	0.15 U	0.0015 U	NA	NA	NA	NA
2,4-D	mg/L	NA	NA	0.01 U	NA	0.5 U	0.005 U	NA	NA	NA	NA
Endrin	mg/L	NA	NA	0.0001 U	NA	0.01 U	0.0001 U	NA	NA	NA	NA
Gamma-BHC (Lindane)	mg/L	NA	NA	0.0001 U	NA	0.01 U	0.0001 U	NA	NA	NA	NA
Heptachlor	mg/L	NA	NA	0.0001 U	NA	0.01 U	0.0001 U	NA	NA	NA	NA
Heptachlor Epoxide	mg/L	NA	NA	0.0001 U	NA	0.01 U	0.0001 U	NA	NA	NA	NA
Methoxychlor	mg/L	NA	NA	0.0002 U	NA	0.02 U	0.0002 U	NA	NA	NA	NA
Technical Chlordane	mg/L	NA	NA	0.005 U	NA	0.5 U	0.005 U	NA	NA	NA	NA
Toxaphene	mg/L	NA	NA	0.0025 U	NA	0.25 U	0.0025 U	NA	NA	NA	NA
Metals - TCLP											
Arsenic	mg/L	NA	NA	0.65	NA	0.5 U	0.5 U	NA	NA	NA	NA

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-062L 10/19/11	WC-PDER-063L 10/27/11	WC-PDER-064L 10/27/11	WC-PDER-065L 10/27/11	WC-PDER-066L 11/03/11	WC-PDER-067L 11/03/11	WC-PDER-068L 11/03/11	WC-PDER-069L 11/03/11	WC-PDER-070L 11/03/11	WC-PDER-071L 11/03/11
Barium	mg/L	NA	NA	1 U	NA	2.3	1 U	NA	NA	NA	NA
Cadmium	mg/L	NA	NA	0.13 U	NA	0.32	0.005 U	NA	NA	NA	NA
Chromium	mg/L	NA	NA	0.5 U	NA	0.61	0.01 U	NA	NA	NA	NA
Copper	mg/L	NA									
Lead	mg/L	NA	NA	0.5 U	NA	22.2	0.5 U	NA	NA	NA	NA
Mercury	mg/L	NA	NA	0.0048	NA	0.008 U	0.0002 U	NA	NA	NA	NA
Nickel	mg/L	NA									
Selenium	mg/L	NA	NA	0.5 U	NA	0.5 U	0.5 U	NA	NA	NA	NA
Silver	mg/L	NA	NA	0.5 U	NA	0.5 U	0.01 U	NA	NA	NA	NA
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	NA	NA	13.54	NA	U	U	NA	NA	NA	NA
Ignitability	°F	NA	NA	U	NA	U	U	NA	NA	NA	NA
pH	SU	NA	NA	13.12	NA	6.09	7.23	NA	NA	NA	NA
Reactive Cyanide	mg/kg	NA	NA	10 U	NA	10 U	10 U	NA	NA	NA	NA
Reactive Sulfide	mg/kg	NA	NA	100 U	NA	100 U	150 U	NA	NA	NA	NA
Reactive Sulfide	mg/L	NA									
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA									
Ammonia-ASTM Leachate	mg/L	NA	NA	NA	NA	100 U	NA	NA	NA	NA	NA
COD-ASTM Leachate	mg/L	NA	NA	NA	NA	100 U	NA	NA	NA	NA	NA
Solids, Total-ASTM Leachate	mg/L	NA	NA	NA	NA	100 U	NA	NA	NA	NA	NA
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA	NA	NA	NA	10 U	NA	NA	NA	NA	NA
Reactive Cyanide	mg/L	NA	NA	NA	NA	100 U	NA	NA	NA	NA	NA
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-072L 11/04/11	WC-PDER-073S 11/04/11	WC-PDER-074L 11/04/11	WC-PDER-075L 11/04/11	WC-PDER-076S 11/04/11	WC-PDER-077L 11/04/11	WC-PDER-078S 11/04/11	WC-PDER-079S 11/04/11	WC-PDER-089S 11/18/11	WC-PDER-102L 11/21/11
Barium	mg/L	1 U	1 U	1 U	1 U	10.6	1 U	1 U	1 U	1 U	NA
Cadmium	mg/L	0.25 U	0.025 U	0.25 U	0.25 U	0.005 U	0.25 U	0.005 U	0.1 U	0.092	NA
Chromium	mg/L	0.5 U	0.64	0.5 U	0.5 U	0.01 U	16.8	0.01 U	0.2 U	0.011	NA
Copper	mg/L	NA									
Lead	mg/L	1.8	1	5.7	0.5 U	0.5 U	1.3	0.51	0.5 U	1.2	NA
Mercury	mg/L	0.008 U	0.0002 U	0.008 U	0.008 U	0.0002 U	0.008 U	0.0002 U	0.0002 U	0.0002 U	NA
Nickel	mg/L	NA									
Selenium	mg/L	0.5 U	NA								
Silver	mg/L	0.5 U	0.01 U	0.5 U	0.5 U	0.01 U	0.5 U	0.01 U	0.02 U	0.05 U	NA
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	U	U	U	U	U	U	U	U	U	NA
Ignitability	°F	U	U	U	U	U	U	U	U	U	NA
pH	SU	10.1	3.44	10.3	7.8	5.8	3.43	3.86	6.14	NA	NA
Reactive Cyanide	mg/kg	10 U	14 U	10 U	10 U	13 U	10 U	11 U	19 U	24 U	NA
Reactive Sulfide	mg/kg	100 U	140 U	100 U	100 U	130 U	100 U	110 U	190 U	240 U	NA
Reactive Sulfide	mg/L	NA									
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA									
Ammonia-ASTM Leachate	mg/L	NA									
COD-ASTM Leachate	mg/L	NA									
Solids, Total-ASTM Leachate	mg/L	NA									
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA									
Reactive Cyanide	mg/L	NA									
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-103L 11/21/11	WC-PDER-104S 12/01/11	WC-PDER-105L 12/01/11	WC-PDER-115L 12/09/11	WC-PDER-116L 01/04/12	WC-PDER-117S 01/09/12	WC-PDER-118S 01/09/12	WC-PDER-119L 01/09/12	WC-PDER-120L 01/17/12	WC-PDER-121S 01/17/12
VOCs - TCLP											
1,1-Dichloroethene	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.5 U	0.005 U
1,2-Dichloroethane	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.5 U	0.005 U
1,4-Dichlorobenzene	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.26 J	0.005 U
2-Butanone	mg/L	NA	0.1 U	NA	0.539	40 U	0.1 U	0.1 U	NA	50 U	0.1 U
Benzene	mg/L	NA	0.005 U	NA	0.005 U	113	0.005 U	0.005 U	NA	2.5 U	0.0181
Carbon Tetrachloride	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.5 U	0.005 U
Chlorobenzene	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.5 U	0.005 U
Chloroform	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.5 U	0.0057
Tetrachloroethene	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.5 U	0.005 U
Trichloroethene	mg/L	NA	0.005 U	NA	0.005 U	2 U	0.005 U	0.005 U	NA	2.5 U	0.005 U
Vinyl Chloride	mg/L	NA	0.025 U	NA	0.025 U	10 U	0.025 U	0.025 U	NA	13 U	0.025 U
SVOCs - TCLP											
1,4-Dichlorobenzene	mg/L	NA	0.02 U	NA	0.02 U	10 U	0.02 U	0.02 U	NA	10 U	0.02 U
2,4,5-Trichloropheno	mg/L	NA	0.05 U	NA	0.05 U	25 U	0.05 U	0.05 U	NA	25 U	0.05 U
2,4,6-Trichloropheno	mg/L	NA	0.05 U	NA	0.05 U	25 U	0.05 U	0.05 U	NA	25 U	0.05 U
2,4-Dinitrotoluene	mg/L	NA	0.02 U	NA	0.02 U	10 U	0.02 U	0.02 U	NA	10 U	0.02 U
2-Methylpheno	mg/L	NA	0.02 U	NA	0.02 U	10 U	0.02 U	0.02 U	NA	10 U	0.02 U
3&4-Methylpheno	mg/L	NA	0.02 U	NA	0.02 U	10 U	0.02 U	0.02 U	NA	10 U	0.02 U
Hexachlorobenzene	mg/L	NA	0.02 U	NA	0.02 U	10 U	0.02 U	0.02 U	NA	10 U	0.02 U
Hexachlorobutadiene	mg/L	NA	0.01 U	NA	0.01 U	5 U	0.01 U	0.01 U	NA	5 U	0.01 U
Hexachloroethane	mg/L	NA	0.05 U	NA	0.05 U	25 U	0.05 U	0.05 U	NA	25 U	0.05 U
Nitrobenzene	mg/L	NA	0.02 U	NA	0.02 U	10 U	0.02 U	0.02 U	NA	10 U	0.02 U
Pentachloropheno	mg/L	NA	0.1 U	NA	0.1 U	50 U	0.1 U	0.1 U	NA	50 U	0.1 U
Pyridine	mg/L	NA	0.02 U	NA	0.02 U	10 U	0.02 U	0.02 U	NA	10 U	0.02 U
PCBs											
Aroclor-1016	mg/kg	1 U	9 U	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.12 U
Aroclor-1221	mg/kg	1 U	9 U	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.12 U
Aroclor-1232	mg/kg	1 U	9 U	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.12 U
Aroclor-1242	mg/kg	1 U	9 U	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.12 U
Aroclor-1248	mg/kg	1 U	9 U	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.12 U
Aroclor-1254	mg/kg	1 U	9 U	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.508
Aroclor-1260	mg/kg	1 U	9 U	15,600	NA	1.32	0.03 U	0.03 U	1 U	1 U	0.12 U
Aroclor-1262	mg/kg	1 U	9 U	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.12 U
Aroclor-1268	mg/kg	1 U	19.2	500 U	NA	1 U	0.03 U	0.03 U	1 U	1 U	0.12 U
Total PCBs	mg/kg	ND	19.2	15,600	NA	1.32	ND	ND	ND	ND	0.508
PCBs - TCLP											
Aroclor-1016	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1221	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1232	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1242	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1248	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1254	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1260	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1262	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Aroclor-1268	ug/L	NA	NA	NA	0.53 U	NA	NA	NA	NA	NA	NA
Pesticides - TCLP											
2,4,5-TP	mg/L	NA	0.0015 U	NA	0.0015 U	0.15 U	0.0015 U	0.0015 U	NA	0.15 U	0.0015 U
2,4-D	mg/L	NA	0.005 U	NA	0.005 U	0.5 U	0.005 U	0.005 U	NA	0.5 U	0.005 U
Endrin	mg/L	NA	0.0001 U	NA	0.00001 U	0.01 U	0.0001 U	0.0001 U	NA	0.276	0.0001 U
Gamma-BHC (Lindane)	mg/L	NA	0.0001 U	NA	0.00001 U	0.01 U	0.002 U	0.002 U	NA	0.01 U	0.0001 U
Heptachlor	mg/L	NA	0.0001 U	NA	0.00001 U	0.01 U	0.0001 U	0.0001 U	NA	0.01 U	0.0001 U
Heptachlor Epoxide	mg/L	NA	0.0001 U	NA	0.00001 U	0.01 U	0.0001 U	0.0001 U	NA	0.01 U	0.0001 U
Methoxychlor	mg/L	NA	0.0002 U	NA	0.00002 U	0.02 U	0.0002 U	0.0002 U	NA	0.02 U	0.0002 U
Technical Chlordane	mg/L	NA	0.005 U	NA	0.0005 U	0.5 U	0.005 U	0.005 U	NA	0.5 U	0.005 U
Toxaphene	mg/L	NA	0.0025 U	NA	0.00025 U	0.25 U	0.0025 U	0.0025 U	NA	0.25 U	0.0025 U
Metals - TCLP											
Arsenic	mg/L	NA	0.5 U	NA	0.5 U	0.5 U	0.5 U	0.5 U	NA	0.5 U	0.5 U

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-103L 11/21/11	WC-PDER-104S 12/01/11	WC-PDER-105L 12/01/11	WC-PDER-115L 12/09/11	WC-PDER-116L 01/04/12	WC-PDER-117S 01/09/12	WC-PDER-118S 01/09/12	WC-PDER-119L 01/09/12	WC-PDER-120L 01/17/12	WC-PDER-121S 01/17/12
Barium	mg/L	NA	1 U	NA	1 U	86.6	1 U	1 U	NA	1.5	4.3
Cadmium	mg/L	NA	0.005 U	NA	0.05 U	1.3	0.005 U	0.014	NA	0.019	0.0051
Chromium	mg/L	NA	0.01 U	NA	0.1 U	0.75	0.01 U	0.01 U	NA	0.01 U	0.01 U
Copper	mg/L	NA									
Lead	mg/L	NA	0.5 U	NA	0.5 U	206	0.5 U	0.5 U	NA	0.5 U	0.5 U
Mercury	mg/L	NA	0.0002 U	NA	0.0016 U	0.008 U	0.0002 U	0.0002 U	NA	0.008 U	0.0002 U
Nickel	mg/L	NA									
Selenium	mg/L	NA	0.5 U	NA	0.5 U	0.5 U	0.5 U	0.5 U	NA	0.5 U	0.5 U
Silver	mg/L	NA	0.01 U	NA	0.1 U	0.5 U	0.01 U	0.01 U	NA	0.01 U	0.01 U
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	NA	U	NA	U	U	U	NA	U	U	
Ignitability	°F	NA	U	NA	U	65.4	U	U	NA	145	U
pH	SU	NA									
Reactive Cyanide	mg/kg	NA	90 U	NA	NA	10 U	10 U	10 U	NA	10 U	12 U
Reactive Sulfide	mg/kg	NA	900 U	NA	NA	100 U	100 U	100 U	NA	100 U	120 U
Reactive Sulfide	mg/L	NA	NA	NA	100 U	NA	NA	NA	NA	NA	NA
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA	800	NA							
Ammonia-ASTM Leachate	mg/L	NA	NA	NA	10 U	NA	NA	NA	NA	NA	NA
COD-ASTM Leachate	mg/L	NA	NA	NA	10 U	NA	NA	NA	NA	NA	NA
Solids, Total-ASTM Leachate	mg/L	NA	NA	NA	10 U	NA	NA	NA	NA	NA	NA
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA									
Reactive Cyanide	mg/L	NA	NA	NA	10 U	NA	NA	NA	NA	NA	NA
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-122S 01/20/12	WC-PDER-142L 01/27/12	WC-PDER-143S 02/02/12	WC-PDER-144L 02/02/12	WC-PDER-145L 02/20/12	WC-PDER-173L 03/16/12	WC-PDER-174L 03/16/12	WC-PDER-175S 03/30/12	WC-PDER-176S 03/30/12	WC-PDER-177S 03/30/12
Barium	mg/L	1 U	NA	1 U	1 U	4.8	1 U	10 U	1 U	1 U	1 U
Cadmium	mg/L	0.005 U	NA	0.047	0.25 U	0.93	0.25 U	0.05 U	0.009	0.038	0.02
Chromium	mg/L	0.01 U	NA	0.05 U	0.5 U	0.5 U	0.5 U	0.1 U	0.01 U	0.042	0.24
Copper	mg/L	NA									
Lead	mg/L	0.5 U	NA	0.5 U	0.5 U	1.2	0.5 U	5 U	0.5 U	0.63	0.5 U
Mercury	mg/L	0.0002 U	NA	0.00065	0.008 U	0.008 U	0.008 U	0.008 U	0.0002 U	0.0002 U	0.0002 U
Nickel	mg/L	NA									
Selenium	mg/L	0.5 U	NA	0.5 U	0.5 U	0.5 U	0.5 U	5 U	0.5 U	0.5 U	0.5 U
Silver	mg/L	0.01 U	NA	0.01 U	0.5 U	0.5 U	0.5 U	0.1 U	0.01 U	0.01 U	0.03 U
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	U	NA	U	U	U	U	U	U	U	U
Ignitability	°F	75 U	NA	U	U	U	110	U	U	U	U
pH	SU	NA	NA	NA	NA	NA	5.55	9.94	NA	NA	NA
Reactive Cyanide	mg/kg	17 U	NA	11 U	10 U	NA	10 U	10 U	10 U	11 U	12 U
Reactive Sulfide	mg/kg	170 U	NA	110 U	100	110 U	120 U				
Reactive Sulfide	mg/L	NA									
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA									
Ammonia-ASTM Leachate	mg/L	NA									
COD-ASTM Leachate	mg/L	NA									
Solids, Total-ASTM Leachate	mg/L	NA									
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA	NA	NA	NA	NA	10 U	NA	NA	NA	NA
Reactive Cyanide	mg/L	NA									
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-178S 03/30/12	WC-PDER-179S 05/01/12	WC-PDER-180S 05/03/12	WC-PDER-181L 05/03/12	WC-PDER-183L 05/24/12	WC-PDER-184L 05/24/12	WC-PDER-185L 05/24/12	WC-PDER-186S 05/24/12	WC-PDER-187S 06/01/12	WC-PDER-188L 06/01/12
Barium	mg/L	4.3	1 U	1 U	50 U	5.3	1 U	2 U	1 U	1 U	1 U
Cadmium	mg/L	0.079	0.41	0.074	0.46	0.25 U	0.25 U	0.01 U	0.005 U	0.005 U	0.25 U
Chromium	mg/L	0.01 U	0.03 U	0.05 U	0.5 U	0.5 U	0.5 U	0.13	0.01 U	0.01 U	0.5 U
Copper	mg/L	NA									
Lead	mg/L	0.5 U	3.2	0.5 U	25 U	94.7	2.6	0.5 U	0.5 U	0.5 U	0.5 U
Mercury	mg/L	0.0002 U	0.00021	0.0002 U	0.008 U	0.008 U	0.008 U	0.0008 U	0.0002 U	0.0002 U	0.008 U
Nickel	mg/L	NA									
Selenium	mg/L	0.5 U	0.5 U	0.5 U	25 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Silver	mg/L	0.01 U	0.065	0.29	0.5 U	0.5 U	0.5 U	0.02 U	0.01 U	0.01 U	0.5 U
Zinc	mg/L	NA									
Miscellaneous											
Coliform, Total	col/100ml	NA									
Coliform, Fecal	col/100ml	NA									
Corrosivity	SU	U	U	U	U	U	U	U	U	U	U
Ignitability	°F	U	U	U	U	130	80 U	U	U	U	130
pH	SU	NA									
Reactive Cyanide	mg/kg	10 U	12 U	12 U	10 U	10 U	10 U	10 U	12 U	15 U	10 U
Reactive Sulfide	mg/kg	100 U	120 U	120 U	100 U	100 U	100 U	NA	120 U	150 U	100 U
Reactive Sulfide	mg/L	NA	NA	NA	NA	NA	NA	100 U	NA	NA	NA
Miscellaneous ASTM Leachate											
Mitone_12.25	%	NA									
Ammonia-ASTM Leachate	mg/L	NA									
COD-ASTM Leachate	mg/L	NA									
Solids, Total-ASTM Leachate	mg/L	NA									
General Chemistry-TCLP											
Reactive Cyanide	mg/kg	NA									
Reactive Cyanide	mg/L	NA									
pH, Step 1 TCLP	SU	NA									
pH, TCLP Leachate	SU	NA									
TPH											
HEM Oil and Grease	mg/kg	NA									
TPH - TCLP											
HEM Oil & Grease-ASTM Leachate	mg/L	NA									

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-189S 06/01/12	WC-PDER-190S 06/04/12	WC-PDER-191S 06/04/12	WC-PDER-192S 06/08/12	WC-PDER-193S 07/26/12	WC-PDER-194S 07/26/12	WC-PDER-195L 07/26/12	WC-PDER-196L, BOTTOM TRANSLUCENT VISCOSUS 08/07/12	WC-PDER-196L, TOP BROWN OIL 08/07/12
Barium	mg/L	1 U	1 U	1 U	NA	0.0066 B	1.3	0.023 B	0.62 B	0.025 B
Cadmium	mg/L	0.005 U	0.0067	0.027	NA	0.01 U	0.0017 B	0.0025 B	0.0014 B	0.0012 B
Chromium	mg/L	0.01 U	0.018	0.023	NA	0.0018 B	0.006 B	0.0027 B	0.03	0.0014 B
Copper	mg/L	NA	NA							
Lead	mg/L	0.5 U	0.5 U	0.5 U	NA	1 U	0.035 B	0.022 B	0.47 B	0.037 B
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	NA	0.0002 U	0.0002 U	0.00014 B	0.008 U	0.0002 U
Nickel	mg/L	NA	NA							
Selenium	mg/L	0.5 U	0.5 U	0.5 U	NA	1 U	0.0037 B	0.5 U	0.0066 B	0.0026 B
Silver	mg/L	0.01 U	0.01 U	0.01 U	NA	0.02 U	0.01 U	0.01 U	0.0026 B	0.01 U
Zinc	mg/L	NA	NA							
Miscellaneous										
Coliform, Total	col/100ml	NA	NA							
Coliform, Fecal	col/100ml	NA	NA							
Corrosivity	SU	U	U	U	NA	U	U	U	U	U
Ignitability	°F	U	U	U	NA	U	U	U	U	U
pH	SU	NA	NA							
Reactive Cyanide	mg/kg	12 U	12 U	26 U	NA	10 U	28 U	10 U	10 U	10 U
Reactive Sulfide	mg/kg	120 U	120 U	260 U	NA	48.5 B	188 B	NA	100 U	100 U
Reactive Sulfide	mg/L	NA	NA	NA	NA	NA	NA	28 B	NA	NA
Miscellaneous ASTM Leachate										
Mitone_12.25	%	NA	NA							
Ammonia-ASTM Leachate	mg/L	NA	NA							
COD-ASTM Leachate	mg/L	NA	NA							
Solids, Total-ASTM Leachate	mg/L	NA	NA							
General Chemistry-TCLP										
Reactive Cyanide	mg/kg	NA	NA							
Reactive Cyanide	mg/L	NA	NA							
pH, Step 1 TCLP	SU	NA	NA							
pH, TCLP Leachate	SU	NA	NA							
TPH										
HEM Oil and Grease	mg/kg	NA	NA							
TPH - TCLP										
HEM Oil & Grease-ASTM Leachate	mg/L	NA	NA							

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-SOIL PILE 1 01/04/13	WC-PDER-198L 01/16/13	RR-TIE-01 02/19/13	WC-PDER-199S 03/05/13	WC-PDER-200L 03/05/13	CURTIS-WC-003 09/19/13	CURTIS-WC-004 09/19/13
VOCs - TCLP								
1,1-Dichloroethene	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	1 U	0.005 U
1,2-Dichloroethane	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	1 U	0.005 U
1,4-Dichlorobenzene	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	1 U	0.005 U
2-Butanone	mg/L	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	20 U	0.1 U
Benzene	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.0655	0.385 J	0.005 U
Carbon Tetrachloride	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	1 U	0.005 U
Chlorobenzene	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	1 U	0.005 U
Chloroform	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	1 U	0.005 U
Tetrachloroethene	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	1 U	0.005 U
Trichloroethene	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	2.66	0.005 U
Vinyl Chloride	mg/L	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U	5 U	0.025 U
SVOCs - TCLP								
1,4-Dichlorobenzene	mg/L	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	4 U	0.02 U
2,4,5-Trichloropheno	mg/L	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	10 U	0.05 U
2,4,6-Trichloropheno	mg/L	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	10 U	0.05 U
2,4-Dinitrotoluene	mg/L	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	4 U	0.02 U
2-Methylpheno	mg/L	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	4 U	0.02 U
3&4-Methylpheno	mg/L	0.02 U	0.02 U	0.0817	0.02 U	0.02 U	4 U	0.02 U
Hexachlorobenzene	mg/L	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	4 U	0.02 U
Hexachlorobutadiene	mg/L	0.01 U	0.01 U	0.01 U	0.01 U	0.01 U	2 U	0.01 U
Hexachloroethane	mg/L	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	10 U	0.05 U
Nitrobenzene	mg/L	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	4 U	0.02 U
Pentachloropheno	mg/L	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	20 U	0.1 U
Pyridine	mg/L	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	4 U	0.02 U
PCBs								
Aroclor-1016	mg/kg	0.036 U	1.7 U	0.64 U	0.036 U	NA	1 U	0.25 U
Aroclor-1221	mg/kg	0.036 U	1.7 U	0.64 U	0.036 U	NA	1 U	0.25 U
Aroclor-1232	mg/kg	0.036 U	1.7 U	0.64 U	0.036 U	NA	1 U	0.25 U
Aroclor-1242	mg/kg	0.036 U	1.7 U	0.64 U	0.036 U	NA	1 U	0.25 U
Aroclor-1248	mg/kg	0.036 U	1.7 U	0.64 U	0.036 U	NA	1 U	0.25 U
Aroclor-1254	mg/kg	0.036 U	1.7 U	0.64 U	0.036 U	NA	1 U	0.25 U
Aroclor-1260	mg/kg	0.036 U	1.7 U	0.64 U	0.424	NA	1 U	0.25 U
Aroclor-1262	mg/kg	0.036 U	1.7 U	NA	0.036 U	NA	1 U	0.25 U
Aroclor-1268	mg/kg	0.036 U	1.7 U	NA	0.036 U	NA	1 U	0.25 U
Total PCBs	mg/kg	ND	ND	ND	0.424	ND	ND	ND
PCBs - TCLP								
Aroclor-1016	ug/L	NA	NA	NA	NA	0.5 U	0.15 U	0.0015 U
Aroclor-1221	ug/L	NA	NA	NA	NA	0.5 U	0.5 U	0.005 U
Aroclor-1232	ug/L	NA	NA	NA	NA	0.5 U	0.01 U	0.0001 U
Aroclor-1242	ug/L	NA	NA	NA	NA	0.5 U	0.01 U	0.0001 U
Aroclor-1248	ug/L	NA	NA	NA	NA	0.5 U	0.01 U	0.0001 U
Aroclor-1254	ug/L	NA	NA	NA	NA	0.5 U	0.01 U	0.0001 U
Aroclor-1260	ug/L	NA	NA	NA	NA	0.5 U	0.02 U	0.0002 U
Aroclor-1262	ug/L	NA	NA	NA	NA	0.5 U	0.5 U	0.005 U
Aroclor-1268	ug/L	NA	NA	NA	NA	0.5 U	0.25 U	0.0025 U
Pesticides - TCLP								
2,4,5-TP	mg/L	0.0015 U	0.0015 U	0.0015 U	0.0015 U	0.0015 U	NA	NA
2,4-D	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	NA	NA
Endrin	mg/L	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	NA	NA
Gamma-BHC (Lindane)	mg/L	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	NA	NA
Heptachlor	mg/L	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	NA	NA
Heptachlor Epoxide	mg/L	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	NA	NA
Methoxychlor	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	NA	NA
Technical Chlordane	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	NA	NA
Toxaphene	mg/L	0.0025 U	0.0025 U	0.0025 U	0.0025 U	0.0025 U	NA	NA
Metals - TCLP								
Arsenic	mg/L	0.001 B	2.5 U	0.0082 B	0.0015 B	0.0021 B	0.13 B	0.0015 B

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-SOIL PILE 1 01/04/13	WC-PDER-198L 01/16/13	RR-TIE-01 02/19/13	WC-PDER-199S 03/05/13	WC-PDER-200L 03/05/13	CURTIS-WC-003 09/19/13	CURTIS-WC-004 09/19/13
Barium	mg/L	0.27 B	0.0075 B	0.069 B	0.48 B	0.12 B	0.36 B	0.014 B
Cadmium	mg/L	0.0025 B	0.025 U	0.0013 B	0.0027 B	0.005 U	0.05 B	0.0006 B
Chromium	mg/L	0.0028 B	0.005 B	0.0032 B	0.0026 B	0.01 U	0.5 U	0.0029 B
Copper	mg/L	NA	NA	0.014 B	NA	NA	NA	NA
Lead	mg/L	0.02 B	2.5 U	0.013 B	0.004 B	0.5 U	0.77 B	1.2
Mercury	mg/L	0.0002 U	0.0016 U	0.0002 U	0.0002 U	0.0002 U	0.006 U	0.0002 U
Nickel	mg/L	NA	NA	0.045	NA	NA	NA	NA
Selenium	mg/L	0.0024 B	2.5 U	0.0045 B	0.0045 B	0.5 U	25 U	0.5 U
Silver	mg/L	0.0015 B	0.05 U	0.01 U	0.0018 B	0.01 U	0.5 U	0.01 U
Zinc	mg/L	NA	NA	0.17	NA	NA	NA	NA
Miscellaneous								
Coliform, Total	col/100ml	NA	NA	NA	NA	NA	NA	NA
Coliform, Fecal	col/100ml	NA	NA	NA	NA	NA	NA	NA
Corrosivity	SU	U	U	NA	U	U	U	U
Ignitability	°F	U	U	U	U	U	147	97.1
pH	SU	NA	NA	3.89	NA	NA	NA	NA
Reactive Cyanide	mg/kg	11 U	70 U	15 U	12 U	10 U	9.9 U	10 U
Reactive Sulfide	mg/kg	82.7 B	217 B	114 B	84.1 B	42.5 B	99 U	100 U
Reactive Sulfide	mg/L	NA	NA	NA	NA	NA	NA	NA
Miscellaneous ASTM Leachate								
Mitone_12.25	%	NA	NA	NA	NA	NA	NA	NA
Ammonia-ASTM Leachate	mg/L	NA	NA	NA	NA	NA	NA	NA
COD-ASTM Leachate	mg/L	NA	NA	NA	NA	NA	NA	NA
Solids, Total-ASTM Leachate	mg/L	NA	NA	NA	NA	NA	NA	NA
General Chemistry-TCLP								
Reactive Cyanide	mg/kg	NA	NA	NA	NA	NA	NA	NA
Reactive Cyanide	mg/L	NA	NA	NA	NA	NA	NA	NA
pH, Step 1 TCLP	SU	NA	NA	4.28	NA	NA	NA	NA
pH, TCLP Leachate	SU	NA	NA	4.88	NA	NA	NA	NA
TPH								
HEM Oil and Grease	mg/kg	NA	NA	32,200	NA	NA	NA	NA
TPH - TCLP								
HEM Oil & Grease-ASTM Leachate	mg/L	NA	NA	0.91 B	NA	NA	NA	NA

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-SOILPILE 1R 02/01/13
BTEX		
Total BTEX	mg/kg	ND
Volatile Organics		
1,1,1-Trichloroethane	mg/kg	0.0066 U
1,1,2,2-Tetrachloroethane	mg/kg	0.0066 U
1,1,2-trichloro-1,2,2-trifluoroethane	mg/kg	0.0066 U
1,1,2-Trichloroethane	mg/kg	0.0066 U
1,1-Dichloroethane	mg/kg	0.0066 U
1,1-Dichloroethene	mg/kg	0.0066 U
1,2,3-Trichlorobenzene	mg/kg	0.0066 U
1,2,4-Trichlorobenzene	mg/kg	0.0066 U
1,2-Dibromo-3-chloropropane	mg/kg	0.013 U
1,2-Dibromoethane	mg/kg	0.0013 U
1,2-Dichlorobenzene	mg/kg	0.0066 U
1,2-Dichloroethane	mg/kg	0.0013 U
1,2-Dichloropropane	mg/kg	0.0066 U
1,3-Dichlorobenzene	mg/kg	0.0066 U
1,4-Dichlorobenzene	mg/kg	0.0066 U
1,4-Dioxane	mg/kg	0.17 U
2-Butanone	mg/kg	0.013 U
2-Hexanone	mg/kg	0.0066 U
4-Methyl-2-pentanone	mg/kg	0.0066 U
Acetone	mg/kg	0.013 U
Benzene	mg/kg	0.0013 U
Bromochloromethane	mg/kg	0.0066 U
Bromodichloromethane	mg/kg	0.0066 U
Bromoform	mg/kg	0.0066 U
Bromomethane	mg/kg	0.0066 U
Carbon Disulfide	mg/kg	0.0066 U
Carbon Tetrachloride	mg/kg	0.0066 U
Chlorobenzene	mg/kg	0.0066 U
Chloroethane	mg/kg	0.0066 U
Chloroform	mg/kg	0.0015 J
Chloromethane	mg/kg	0.0066 U
cis-1,2-Dichloroethene	mg/kg	0.0066 U
cis-1,3-Dichloropropene	mg/kg	0.0066 U
Cyclohexane	mg/kg	0.0066 U
Dibromochloromethane	mg/kg	0.0066 U
Dichlorodifluoromethane	mg/kg	0.0066 U
Ethyl acetate	mg/kg	0.0066 U
Ethylbenzene	mg/kg	0.0013 U
Isopropylbenzene	mg/kg	0.0066 U
m&p-Xylene	mg/kg	0.0013 U
Methyl acetate	mg/kg	0.0066 U
Methyl tert-butyl ether	mg/kg	0.0013 U
Methylcyclohexane	mg/kg	0.0066 U
Methylene Chloride	mg/kg	0.0066 U
o-Xylene	mg/kg	0.0013 U

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-SOILPILE 1R 02/01/13
Styrene	mg/kg	0.0066 U
Tetrachloroethene	mg/kg	0.0066 U
Toluene	mg/kg	0.0013 U
Total Alkanes	mg/kg	0
Total TIC, Volatile	mg/kg	0
trans-1,2-Dichloroethene	mg/kg	0.0066 U
trans-1,3-Dichloropropene	mg/kg	0.0066 U
Trichloroethene	mg/kg	0.0066 U
Trichlorofluoromethane	mg/kg	0.0066 U
Vinyl Chloride	mg/kg	0.0066 U
Xylenes (total)	mg/kg	0.0013 U
Total VOCs	mg/kg	0.0015 J
PCBs		
Aroclor-1016	mg/kg	0.035 U
Aroclor-1221	mg/kg	0.035 U
Aroclor-1232	mg/kg	0.035 U
Aroclor-1242	mg/kg	0.035 U
Aroclor-1248	mg/kg	0.035 U
Aroclor-1254	mg/kg	0.035 U
Aroclor-1260	mg/kg	0.035 U
Aroclor-1262	mg/kg	NA
Aroclor-1268	mg/kg	NA
Total PCBs	mg/kg	ND

TABLE 2. WASTE CHARACTERIZATION ANALYTICAL RESULTS
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Notes:

1. Samples collected by ARCADIS from 2011 through 2013.
2. Analyses:

ASTM	American Society for Testing and Materials
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes
COD	Chemical Oxygen Demand
PCB	Polychlorinated Biphenyl
SVOC	Semi-Volatile Organic Compound
TCLP	Toxicity Characteristic Leaching Procedure
TPH	Total Petroleum Hydrocarbons
VOC	Volatile Organic Compound

3. Units:

mg/L	milligram per liter
mg/kg	milligrams per kilogram
ug/L	microgram per liter
col/100ml	colony forming units per 100 milliliters
SU	Standard Units
°F	degrees Farenheit
%	percentage

4. Qualifiers:

B	Inorganic Compounds: Indicates an estimated value between the instrument detection limit and the reporting limit. Organic Compounds: Analyte was also detected in the associated method blank.
J	Indicates an estimated value.
NA	Not Analyzed
ND	None detected.
U	The compound was analyzed for but not detected. The associated value is the compound quantitation limit.

5. General Sample ID Nomenclature:

RATIONALE - PROGRAM DESIGNATION - (NUMBER [###] MEDIA TYPE) or (MEDIA TYPE, NUMBER [#])

<u>Rationale</u>	<u>Program Designation:</u>	<u>Media Type:</u>
WC:	Waste Characterization	PDER: Pre-Demolition Environmental Removals
		S: Solid
		L: Liquid
		SOIL PILE: Soil

6. Special Sample ID Nomenclatures:

TFC-CL2-###	Total Fecal Coliform from Second Clarifier in Wastewater Treatment Plant Area
RR-TIE-01	Railroad Tie

TABLE 3. PAINT CHIP SAMPLE SUMMARY - PCBs AND LEAD

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-039S 09/19/11	WC-PDER-041S 10/07/11	WC-PDER-042S 10/07/11	WC-PDER-043S 10/07/11	WC-PDER-044S 10/07/11	WC-PDER-045S 10/07/11	WC-PDER-046S 10/10/11	WC-PDER-047S 10/10/11	WC-PDER-048S 10/10/11	WC-PDER-049S 10/10/11	WC-PDER-050S 10/10/11	WC-PDER-092S 11/18/11
PCBs													
Aroclor-1016	mg/kg	0.038 U	0.27 U	0.29 U	0.3 U	0.46 U	0.32 U	0.12 U	0.14 U	0.031 U	0.12 U	0.11 U	0.033 U
Aroclor-1221	mg/kg	0.038 U	0.27 U	0.29 U	0.3 U	0.46 U	0.32 U	0.12 U	0.14 U	0.031 U	0.12 U	0.11 U	0.033 U
Aroclor-1232	mg/kg	0.038 U	0.27 U	0.29 U	0.3 U	0.46 U	0.32 U	0.12 U	0.14 U	0.031 U	0.12 U	0.11 U	0.033 U
Aroclor-1242	mg/kg	0.038 U	0.27 U	0.29 U	0.3 U	0.46 U	0.32 U	0.12 U	0.14 U	0.031 U	0.12 U	0.11 U	0.033 U
Aroclor-1248	mg/kg	0.038 U	0.27 U	0.29 U	0.3 U	0.46 U	0.32 U	0.12 U	0.14 U	0.031 U	0.12 U	0.11 U	0.033 U
Aroclor-1254	mg/kg	0.212	1.39	1.25	1.73	1.75	0.32 U	644	284	0.685	4.4	0.912	4.94
Aroclor-1260	mg/kg	0.174	0.27 U	2.1	1.13	2.13	2.22	0.12 U	0.14 U	0.364	3.7	0.825	1.13
Aroclor-1262	mg/kg	0.038 U	0.27 U	0.29 U	0.3 U	0.46 U	0.32 U	0.12 U	0.14 U	0.031 U	0.12 U	0.11 U	0.033 U
Aroclor-1268	mg/kg	0.038 U	0.27 U	0.29 U	0.3 U	0.46 U	0.32 U	0.12 U	0.14 U	0.031 U	0.12 U	0.11 U	0.033 U
Total PCBs	mg/kg	0.386	1.39	3.35	2.86	3.88	2.22	644	284	1.049	8.1	1.737	6.07
Metals - TCLP													
Lead	mg/L	NA											

Location ID: Date Collected:	Units	WC-PDER-052S 10/11/11	WC-PDER-054S 10/11/11	WC-PDER-055S 10/11/11	WC-PDER-056S 10/13/11	WC-PDER-057S 10/13/11	WC-PDER-058S 10/13/11	WC-PDER-059S 10/13/11	WC-PDER-060S 10/19/11	WC-PDER-061S 10/19/11	WC-PDER-090S 11/18/11	WC-PDER-091S 11/18/11	WC-PDER-126S 01/20/12
PCBs													
Aroclor-1016	mg/kg	0.26 U	0.26 U	0.31 U	0.26 U	0.27 U	0.26 U	0.32 U	0.3 U	0.27 U	0.038 U	0.034 U	0.23 U
Aroclor-1221	mg/kg	0.26 U	0.26 U	0.31 U	0.26 U	0.27 U	0.26 U	0.32 U	0.3 U	0.27 U	0.038 U	0.034 U	0.23 U
Aroclor-1232	mg/kg	0.26 U	0.26 U	0.31 U	0.26 U	0.27 U	0.26 U	0.32 U	0.3 U	0.27 U	0.038 U	0.034 U	0.23 U
Aroclor-1242	mg/kg	0.26 U	0.26 U	0.31 U	0.26 U	0.27 U	0.26 U	0.32 U	0.3 U	0.27 U	0.038 U	0.034 U	0.23 U
Aroclor-1248	mg/kg	0.26 U	0.26 U	0.31 U	0.26 U	0.27 U	0.26 U	0.32 U	0.3 U	0.27 U	0.038 U	0.034 U	0.23 U
Aroclor-1254	mg/kg	21.5	5.62	1.07	1.66	1.15	1.36	1.24	20.3	6.37	1.42	1.28	0.23 U
Aroclor-1260	mg/kg	0.26 U	1.72	0.31 U	2.31	0.959	1.43	0.494	4.87	4.46	1.73	1.14	0.23 U
Aroclor-1262	mg/kg	0.26 U	0.26 U	0.31 U	0.26 U	0.27 U	0.26 U	0.32 U	0.3 U	0.27 U	0.038 U	0.034 U	0.23 U
Aroclor-1268	mg/kg	0.26 U	0.26 U	0.31 U	0.26 U	0.27 U	0.26 U	0.32 U	0.3 U	0.27 U	0.038 U	0.034 U	0.23 U
Total PCBs	mg/kg	21.5	7.34	1.07	3.97	2.109	2.79	1.734	25.17	10.83	3.15	2.42	ND
Metals - TCLP													
Lead	mg/L	NA	2.2	0.5 U	NA	NA	NA						

TABLE 3. PAINT CHIP SAMPLE SUMMARY - PCBs AND LEAD

CURTIS SPECIALTY PAPERS SITE

MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-093S 11/18/11	WC-PDER-094S 11/18/11	WC-PDER-095S 11/18/11	WC-PDER-096S 11/18/11	WC-PDER-097S 11/21/11	WC-PDER-098S 11/21/11	WC-PDER-101S 11/21/11	WC-PDER-123S 01/20/12	WC-PDER-124S 01/20/12	WC-PDER-125S 01/20/12
PCBs											
Aroclor-1016	mg/kg	0.032 U	0.035 U	0.14 U	0.036 U	NA	NA	0.04 U	0.31 U	0.24 U	0.26 U
Aroclor-1221	mg/kg	0.032 U	0.035 U	0.14 U	0.036 U	NA	NA	0.04 U	0.31 U	0.24 U	0.26 U
Aroclor-1232	mg/kg	0.032 U	0.035 U	0.14 U	0.036 U	NA	NA	0.04 U	0.31 U	0.24 U	0.26 U
Aroclor-1242	mg/kg	0.032 U	0.035 U	0.14 U	0.036 U	NA	NA	0.04 U	0.31 U	0.24 U	0.26 U
Aroclor-1248	mg/kg	0.032 U	0.035 U	0.14 U	0.036 U	NA	NA	0.04 U	0.31 U	0.24 U	0.26 U
Aroclor-1254	mg/kg	1.61	1.91	22.4	3.2	NA	NA	0.04 U	3.27	2.12	2.14
Aroclor-1260	mg/kg	0.032 U	0.997	4.91	1.06	NA	NA	1.76	6.49	2.06	1.09
Aroclor-1262	mg/kg	0.032 U	0.035 U	0.14 U	0.036 U	NA	NA	0.04 U	0.31 U	0.24 U	0.26 U
Aroclor-1268	mg/kg	0.032 U	0.035 U	0.14 U	0.036 U	NA	NA	0.04 U	0.31 U	0.24 U	0.26 U
Total PCBs	mg/kg	1.61	2.907	27.31	4.26			1.76	9.76	4.18	3.23
Metals - TCLP											
Lead	mg/L	NA	NA	NA	NA	6.2	252	NA	NA	NA	NA

Location ID: Date Collected:	Units	WC-PDER-139S 01/24/12	WC-PDER-140S 01/24/12	WC-PDER-141S 01/24/12	WC-PDER-167S 03/12/12	WC-PDER-168S 03/12/12	WC-PDER-169S 03/12/12	WC-PDER-170S 03/12/12	WC-PDER-171S 03/12/12	WC-PDER-172S 03/12/12
PCBs										
Aroclor-1016	mg/kg	0.28 U	0.3 U	0.28 U	0.033 U	0.032 U	0.041 U	0.033 U	0.034 U	0.035 U
Aroclor-1221	mg/kg	0.28 U	0.3 U	0.28 U	0.033 U	0.032 U	0.041 U	0.033 U	0.034 U	0.035 U
Aroclor-1232	mg/kg	0.28 U	0.3 U	0.28 U	0.033 U	0.032 U	0.041 U	0.033 U	0.034 U	0.035 U
Aroclor-1242	mg/kg	0.28 U	0.3 U	0.28 U	0.033 U	0.032 U	0.041 U	0.033 U	0.034 U	0.035 U
Aroclor-1248	mg/kg	0.28 U	0.3 U	0.28 U	0.033 U	0.032 U	0.041 U	0.033 U	0.034 U	0.035 U
Aroclor-1254	mg/kg	0.28 U	0.3 U	0.28 U	0.771	2.07	0.413	0.45	44.2	0.427
Aroclor-1260	mg/kg	3.93	4.47	2.72	0.582	0.414	0.765	0.989	5.59	0.035 U
Aroclor-1262	mg/kg	0.28 U	0.3 U	0.28 U	0.033 U	0.032 U	0.041 U	0.033 U	0.034 U	0.035 U
Aroclor-1268	mg/kg	0.28 U	0.3 U	0.28 U	0.033 U	0.032 U	0.041 U	0.033 U	0.034 U	0.035 U
Total PCBs	mg/kg	3.93	4.47	2.72	1.353	2.484	1.178	1.439	49.79	0.427
Metals - TCLP										
Lead	mg/L	NA								

**TABLE 3. PAINT CHIP SAMPLE SUMMARY - PCBs AND LEAD
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY**

Notes:

1. Samples collected by ARCADIS in 2011 and 2012.

2. Analyses:

PCB	Polychlorinated Biphenyl
TCLP	Toxicity Characteristic Leaching Procedure

3. Units:

mg/L	milligram per liter
mg/kg	milligrams per kilogram

4. Qualifiers:

NA	Not Analyzed
ND	None detected.
U	The compound was analyzed for but not detected. The associated value is the compound quantitation limit.

5. Sample ID Nomenclature:

RATIONALE - PROGRAM DESIGNATION - (NUMBER [###] MEDIA TYPE) or (MEDIA TYPE, NUMBER [#])

Rationale

WC: Waste Characterization

Program Designation:

PDER: Pre-Demolition Environmental Removals

Media Type:

S: Solid

TABLE 4. CONCRETE/MASONRY SAMPLE SUMMARY - PCBs

CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-035S 09/19/11	WC-PDER-036S 09/19/11	WC-PDER-037S 09/19/11	WC-PDER-038S 09/19/11	WC-PDER-21HOLD1 11/18/11	WC-PDER-21HOLD2 11/18/11	WC-PDER-21HOLD3 11/18/11	WC-PDER-080S 11/18/11	WC-PDER-099S 11/21/11	WC-PDER-100S 11/21/11	WC-PDER-106S 12/09/11	WC-PDER-107S 12/09/11
PCBs													
Aroclor-1016	mg/kg	0.03 U	0.029 U	0.029 U	0.03 U	0.03 U	0.03 U	0.3 U	0.03 U				
Aroclor-1221	mg/kg	0.03 U	0.029 U	0.029 U	0.03 U	0.03 U	0.03 U	0.3 U	0.03 U				
Aroclor-1232	mg/kg	0.03 U	0.029 U	0.029 U	0.03 U	0.03 U	0.03 U	0.3 U	0.03 U				
Aroclor-1242	mg/kg	0.0678	3.39	14.2	1.08	0.03 U	0.029 U	0.029 U	0.03 U	0.03 U	0.03 U	0.3 U	0.03 U
Aroclor-1248	mg/kg	0.03 U	0.029 U	0.029 U	0.03 U	0.03 U	0.03 U	0.3 U	0.03 U				
Aroclor-1254	mg/kg	0.03 U	0.03 U	0.03 U	NA	4.27	7.73	10.8	0.361	0.175	0.0658	7.59	0.468
Aroclor-1260	mg/kg	0.427	19.4	73.8	5.44	0.03 U	0.029 U	0.029 U	0.158	0.03 U	0.0469	0.3 U	0.03 U
Aroclor-1262	mg/kg	0.03 U	0.029 U	0.029 U	0.03 U	0.03 U	0.03 U	0.3 U	0.03 U				
Aroclor-1268	mg/kg	0.03 U	0.029 U	0.029 U	0.03 U	0.03 U	0.03 U	0.3 U	0.03 U				
Total PCBs	mg/kg	0.4948	22.79	88	6.52	4.27	7.73	10.8	0.519	0.175	0.1127	7.59	0.468

Metals - TCLP

Lead	mg/L	NA											
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Location ID: Date Collected:	Units	WC-PDER-081S 11/18/11	WC-PDER-082S 11/18/11	WC-PDER-083S 11/18/11	WC-PDER-084S 11/18/11	WC-PDER-085S 11/18/11	WC-PDER-086S 11/18/11	WC-PDER-087S 11/18/11	WC-PDER-088S 11/18/11	WC-PDER-113S 12/09/11	WC-PDER-114S 12/09/11	WC-PDER-127S 01/24/12	WC-PDER-128S 01/24/12
PCBs													
Aroclor-1016	mg/kg	0.034 U	0.032 U	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	0.26 U	0.24 U
Aroclor-1221	mg/kg	0.034 U	0.032 U	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	0.26 U	0.24 U
Aroclor-1232	mg/kg	0.034 U	0.032 U	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	0.26 U	0.24 U
Aroclor-1242	mg/kg	0.034 U	0.032 U	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	0.26 U	0.24 U
Aroclor-1248	mg/kg	0.034 U	0.032 U	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	0.26 U	0.24 U
Aroclor-1254	mg/kg	0.101	0.0868	24.5	4.24	4.75	4.06	2.84	39.8	1.96	4.97	0.26 U	0.24 U
Aroclor-1260	mg/kg	0.034 U	0.033	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	658	1.92
Aroclor-1262	mg/kg	0.034 U	0.032 U	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	0.26 U	0.24 U
Aroclor-1268	mg/kg	0.034 U	0.032 U	0.03 U	0.031 U	0.031 U	0.03 U	0.031 U	0.031 U	0.031 U	0.032 U	0.26 U	0.24 U
Total PCBs	mg/kg	0.101	0.1198	24.5	4.24	4.75	4.06	2.84	39.8	1.96	4.97	658	1.92

Metals - TCLP

Lead	mg/L	NA											
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TABLE 4. CONCRETE/MASONRY SAMPLE SUMMARY - PCBs

CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-108S 12/09/11	WC-PDER-109S 12/09/11	WC-PDER-110S 12/09/11	WC-PDER-111S 12/09/11	WC-PDER-112S 12/09/11	WC-PDER-134S 01/24/12	WC-PDER-135S 01/24/12	WC-PDER-136S 01/24/12	WC-PDER-137S 01/24/12	WC-PDER-138S 01/24/12	CM-034-1-01W-R 02/20/12	WC-PDER-146S 03/02/12
PCBs													
Aroclor-1016	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	0.25 U	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	0.031 U
Aroclor-1221	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	0.25 U	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	0.031 U
Aroclor-1232	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	0.25 U	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	0.031 U
Aroclor-1242	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	1.25	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	215
Aroclor-1248	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	0.25 U	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	0.031 U
Aroclor-1254	mg/kg	0.0855	3.4	0.611	1.08	35.1	0.25 U	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	0.031 U
Aroclor-1260	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	8.43	0.25 U	37.7	0.303	0.24 U	0.0491	1,090
Aroclor-1262	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	0.25 U	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	0.031 U
Aroclor-1268	mg/kg	0.03 U	0.03 U	0.03 U	0.031 U	0.031 U	0.25 U	0.25 U	0.25 U	0.23 U	0.24 U	0.03 U	0.031 U
Total PCBs	mg/kg	0.0855	3.4	0.611	1.08	35.1	9.68	ND	37.7	0.303	ND	0.0491	1,305
Metals - TCLP													
Lead	mg/L	NA	NA										

Location ID: Date Collected:	Units	WC-PDER-129S 01/24/12	WC-PDER-130S 01/24/12	WC-PDER-131S 01/24/12	WC-PDER-132S 01/24/12	WC-PDER-133S 01/24/12	WC-PDER-149S 03/02/12	WC-PDER-150S 03/02/12	WC-PDER-151S 03/02/12	WC-PDER-152S 03/02/12	WC-PDER-153S 03/02/12	WC-PDER-154S 03/02/12	WC-PDER-155S 03/02/12
PCBs													
Aroclor-1016	mg/kg	0.26 U	0.25 U	0.25 U	0.23 U	0.25 U	0.031 U	0.031 U	0.032 U	0.031 U	0.03 U	0.03 U	0.031 U
Aroclor-1221	mg/kg	0.26 U	0.25 U	0.25 U	0.23 U	0.25 U	0.031 U	0.031 U	0.032 U	0.031 U	0.03 U	0.03 U	0.031 U
Aroclor-1232	mg/kg	0.26 U	0.25 U	0.25 U	0.23 U	0.25 U	0.031 U	0.031 U	0.032 U	0.031 U	0.03 U	0.03 U	0.031 U
Aroclor-1242	mg/kg	0.26 U	1,160	12.9	3.97	0.25 U	397	8.21	11.9	4.18	0.941	0.03 U	0.207
Aroclor-1248	mg/kg	0.26 U	0.25 U	0.25 U	0.23 U	0.25 U	0.031 U	0.031 U	0.032 U	0.031 U	0.03 U	0.03 U	0.031 U
Aroclor-1254	mg/kg	0.26 U	0.25 U	0.25 U	0.23 U	0.25 U	0.031 U	0.031 U	0.032 U	0.031 U	0.03 U	0.03 U	0.031 U
Aroclor-1260	mg/kg	6.33	7,240	77.5	22.7	14.6	2,040	47.4	65.8	22.8	6.06	0.03 U	0.875
Aroclor-1262	mg/kg	0.26 U	0.25 U	0.25 U	0.23 U	0.25 U	0.031 U	0.031 U	0.032 U	0.031 U	0.03 U	0.784	0.031 U
Aroclor-1268	mg/kg	0.26 U	0.25 U	0.25 U	0.23 U	0.25 U	0.031 U	0.031 U	0.032 U	0.031 U	0.03 U	0.03 U	0.031 U
Total PCBs	mg/kg	6.33	8,400	90.4	26.67	14.6	2,437	55.61	77.7	26.98	7,001	0.784	1,082
Metals - TCLP													
Lead	mg/L	NA											

TABLE 4. CONCRETE/MASONRY SAMPLE SUMMARY - PCBs

CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Location ID: Date Collected:	Units	WC-PDER-147S 03/02/12	WC-PDER-148S 03/02/12	WC-PDER-158S 03/02/12	WC-PDER-159S 03/02/12	WC-PDER-160S 03/02/12	WC-PDER-161S 03/02/12	WC-PDER-162S 03/02/12	WC-PDER-163S 03/02/12	WC-PDER-164S 03/02/12	WC-PDER-165S 03/02/12	WC-PDER-166S 03/02/12
PCBs												
Aroclor-1016	mg/kg	0.031 U	0.03 U	0.03 U	0.03 U	0.03 U	0.03 U					
Aroclor-1221	mg/kg	0.031 U	0.03 U	0.03 U	0.03 U	0.03 U	0.03 U					
Aroclor-1232	mg/kg	0.031 U	0.03 U	0.03 U	0.03 U	0.03 U	0.03 U					
Aroclor-1242	mg/kg	10.6	1.75	0.488	0.0989	0.031 U	0.377	0.0594	0.0426	0.562	0.0562	0.03 U
Aroclor-1248	mg/kg	0.031 U	0.03 U	0.03 U	0.03 U	0.03 U	0.03 U					
Aroclor-1254	mg/kg	0.031 U	0.03 U	0.03 U	0.03 U	0.03 U	0.03 U					
Aroclor-1260	mg/kg	56.1	10.5	3.34	0.721	0.151	2.78	0.429	0.277	6.93	0.434	0.122
Aroclor-1262	mg/kg	0.031 U	0.03 U	0.03 U	0.03 U	0.03 U	0.03 U					
Aroclor-1268	mg/kg	0.031 U	0.03 U	0.03 U	0.03 U	0.03 U	0.03 U					
Total PCBs	mg/kg	66.7	12.25	3.828	0.8199	0.151	3.157	0.4884	0.3196	7.492	0.4902	0.122
Metals - TCLP												
Lead	mg/L	NA										

Location ID: Date Collected:	Units	WC-PDER-156S 03/02/12	WC-PDER-157S 03/02/12
PCBs			
Aroclor-1016	mg/kg	0.031 U	0.03 U
Aroclor-1221	mg/kg	0.031 U	0.03 U
Aroclor-1232	mg/kg	0.031 U	0.03 U
Aroclor-1242	mg/kg	0.205	0.142
Aroclor-1248	mg/kg	0.031 U	0.03 U
Aroclor-1254	mg/kg	0.031 U	0.03 U
Aroclor-1260	mg/kg	1.06	0.782
Aroclor-1262	mg/kg	0.031 U	0.03 U
Aroclor-1268	mg/kg	0.031 U	0.03 U
Total PCBs	mg/kg	1.265	0.924
Metals - TCLP			
Lead	mg/L	NA	NA

TABLE 4. CONCRETE/MASONRY SAMPLE SUMMARY - PCBs
CURTIS SPECIALTY PAPERS SITE
MILFORD, NEW JERSEY

Notes:

1. Samples collected by ARCADIS in 2011 and 2012.

2. Analyses:

PCB	Polychlorinated Biphenyl
TCLP	Toxicity Characteristic Leaching Procedure

3. Units:

mg/L	milligram per liter
mg/kg	milligrams per kilogram

4. Qualifiers:

NA	Not Analyzed
ND	None detected.
U	The compound was analyzed for but not detected. The associated value is the compound quantitation limit

5. Sample ID Nomenclature:

RATIONALE - PROGRAM DESIGNATION - (NUMBER [###] MEDIA TYPE)

Rationale

WC: Waste Characterization

Program Designation:

PDER: Pre-Demolition Environmental Removals

Media Type:

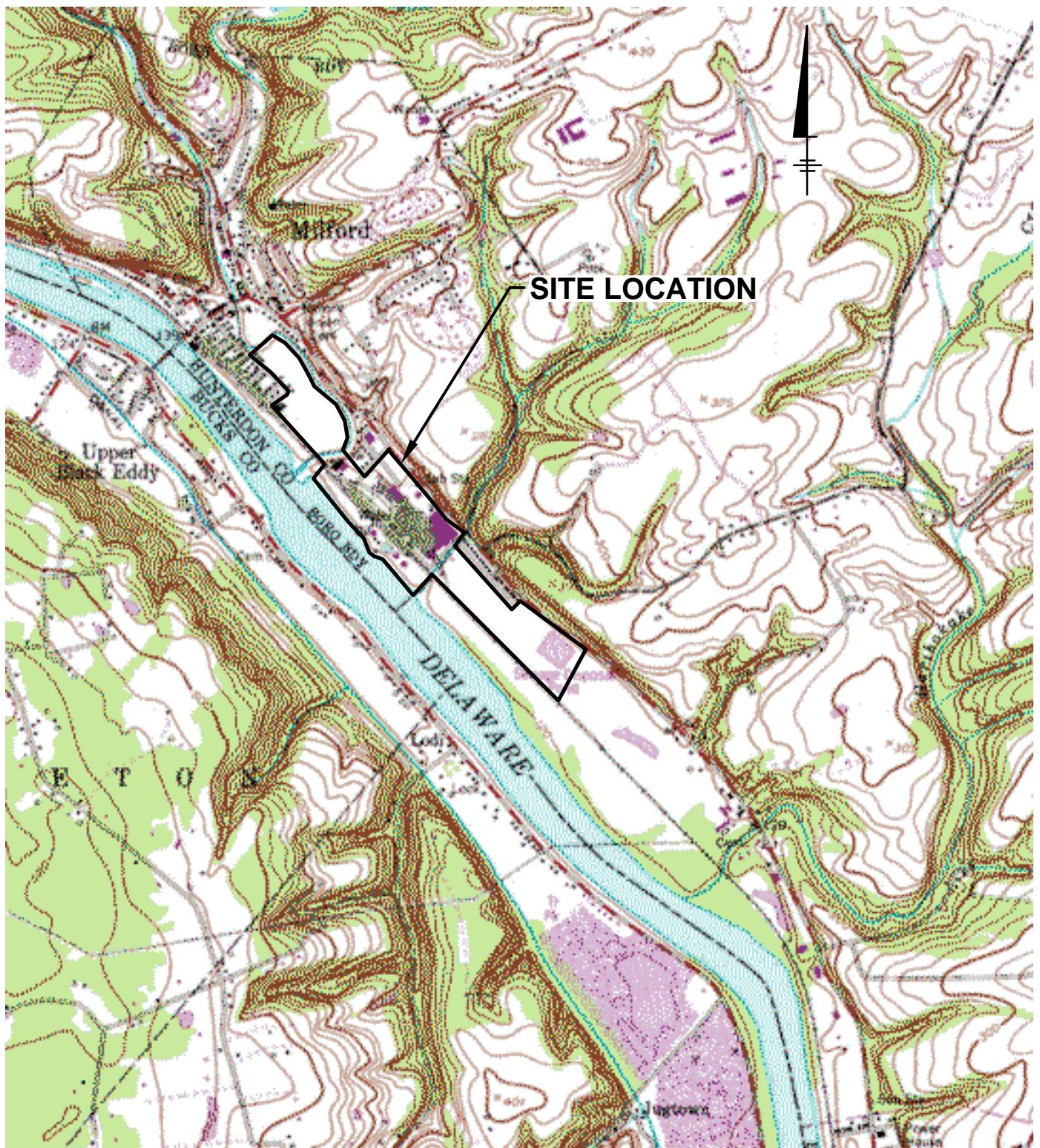
S: Solid

6. Special Sample ID Nomenclatures:

WC-PDER-21HOLD#:

Samples placed on hold in the laboratory pending a need for additional delineation

Figures



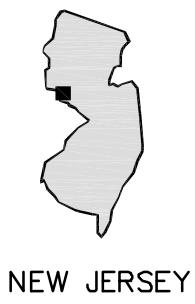
SOURCE:
USGS QUADRANGLE MAP
FRENCHTOWN, NJ
7.5 MINUTE SERIES, REVISED 1995
CONTOUR INTERVAL 20 FEET

PROJECT NAME: ----

IMAGES:

6137X01.tif

XREFS:



NEW JERSEY

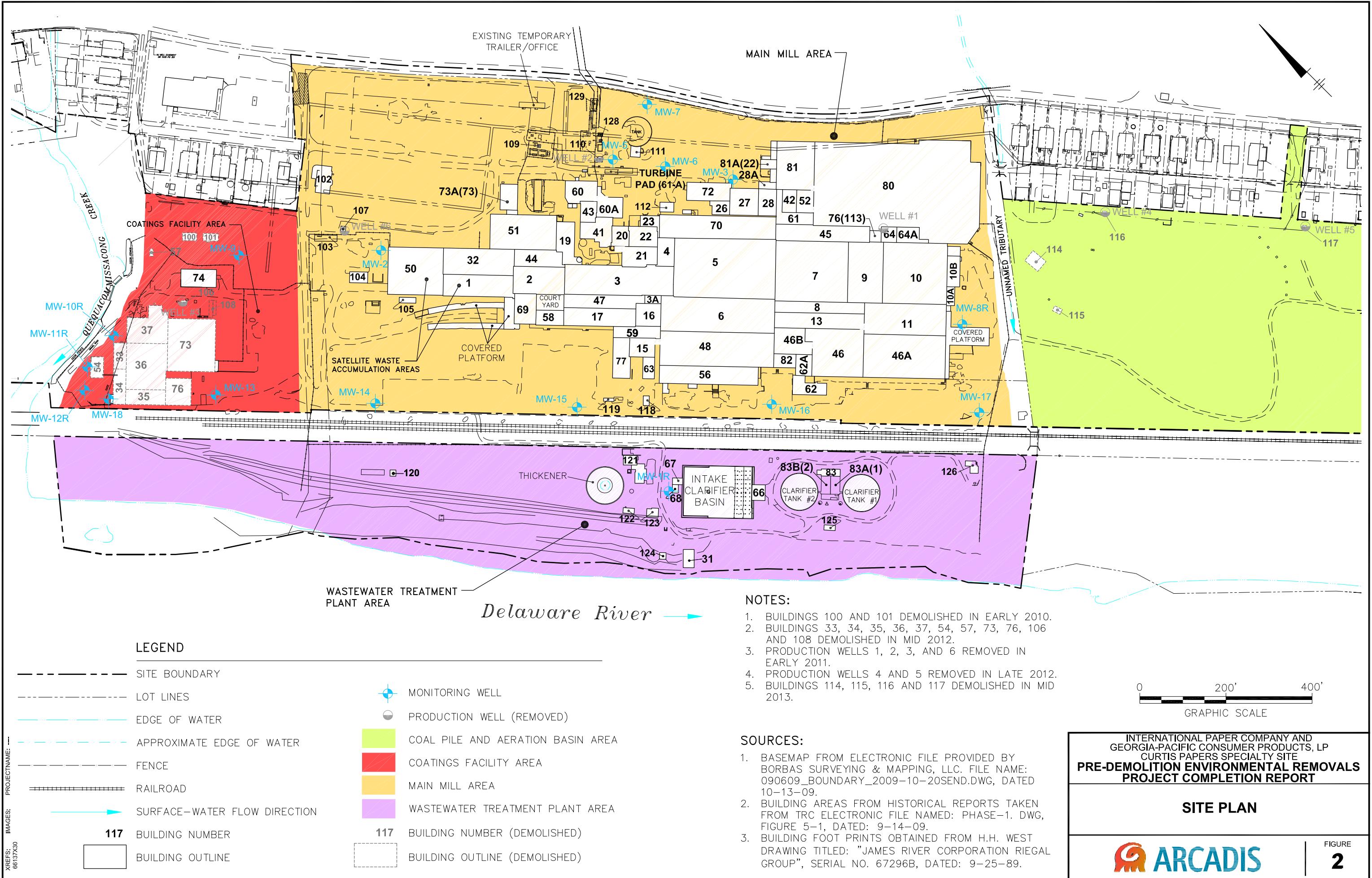
0 2000' 4000'
GRAPHIC SCALE

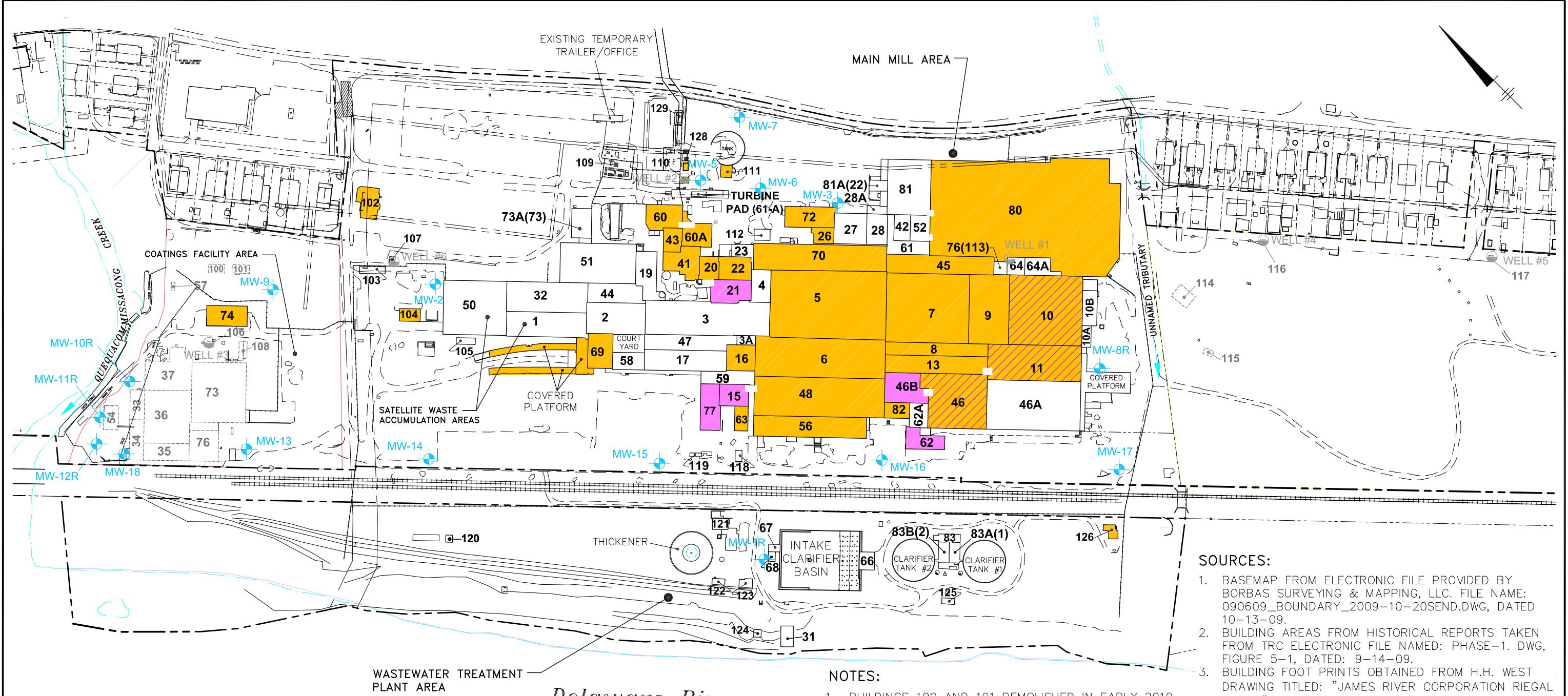
INTERNATIONAL PAPER COMPANY AND
GEORGIA-PACIFIC CONSUMER PRODUCTS, LP
CURTIS SPECIALTY PAPERS SITE
**PRE-DEMOLITION ENVIRONMENTAL REMOVALS
PROJECT COMPLETION REPORT**

SITE LOCATION MAP

 **ARCADIS**

FIGURE
1





LEGEND

SITE BOUNDARY	
LOT LINES	
EDGE OF WATER	
APPROXIMATE EDGE OF WATER	
FENCE	
RAILROAD	
SURFACE-WATER FLOW DIRECTION	
BUILDING NUMBER	
BUILDING OUTLINE	
117	
117	

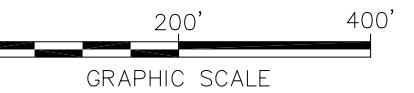
Delaware River

NOTES:

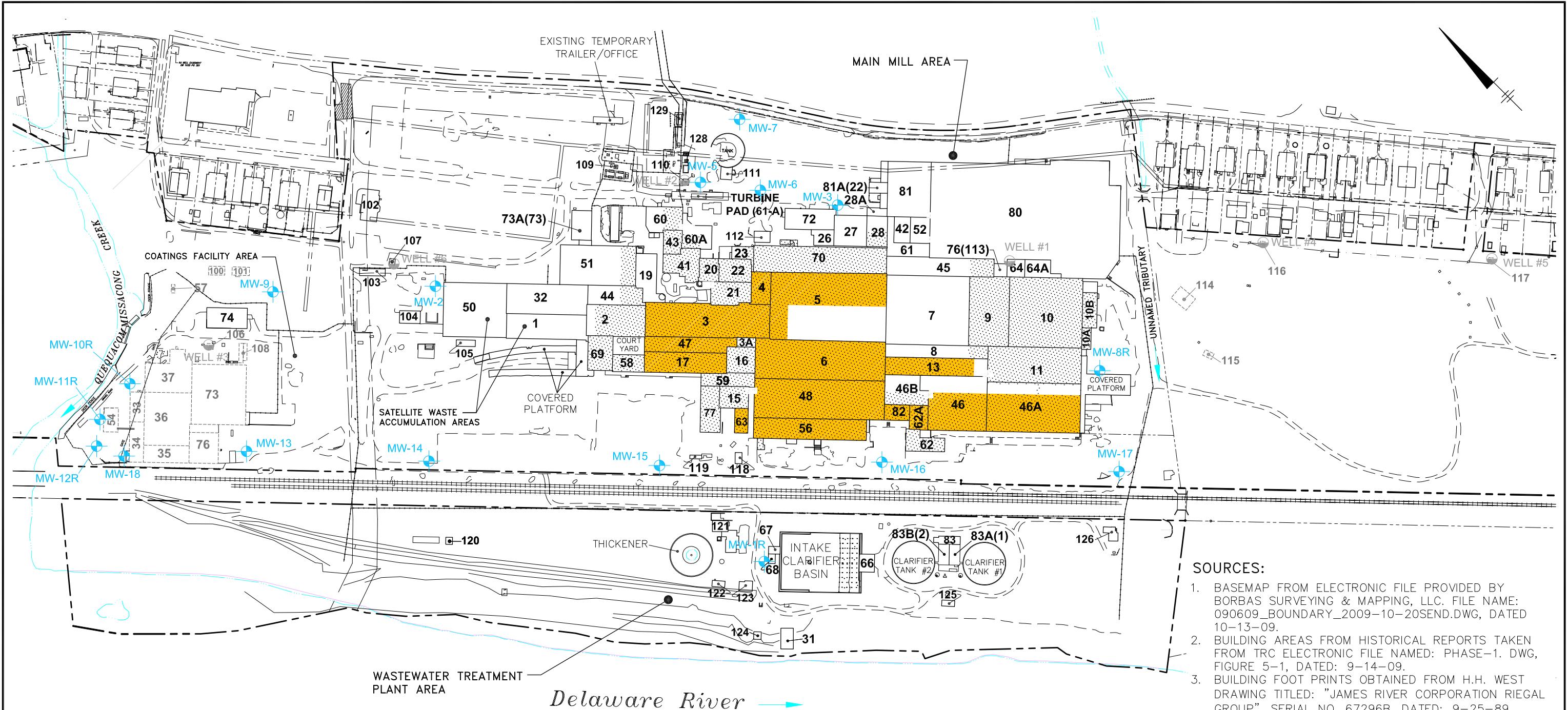
- BUILDINGS 100 AND 101 DEMOLISHED IN EARLY 2010.
- BUILDINGS 33, 34, 35, 36, 37, 54, 57, 73, 76, 106 AND 108 DEMOLISHED IN MID 2012.
- PRODUCTION WELLS 1, 2, 3, AND 6 REMOVED IN EARLY 2011.
- PRODUCTION WELLS 4 AND 5 REMOVED IN LATE 2012.
- BUILDINGS 114, 115, 116 AND 117 DEMOLISHED IN MID 2013.
- ASBESTOS-CONTAINING MATERIAL (ACM) LOCATED ON OR IN AREAS THAT WERE INACCESSIBLE DUE TO UNRELIABLE ROOF/BUILDING STRUCTURES, LOCATED IN AREAS REQUIRING PARTIAL OR TOTAL BUILDING DEMOLITION, OR LOCATED IN AREAS OUTSIDE THE SCOPE OF WORK, WAS NOT REMOVED DURING PRE-DEMOLITION ENVIRONMENTAL REMOVAL ACTIVITIES. THE ACM REMAINS IN PLACE AND WILL BE REMOVED AT A LATER DATE.
- REFRIGERANT CONTAINING EQUIPMENT SUSPECTED ON ROOF AREAS THAT WERE INACCESSIBLE DUE TO UNRELIABLE ROOF STRUCTURE BASED ON HVAC UNIT PRESENCE BUT NOT CONFIRMED. THESE REFRIGERANT CONTAINING EQUIPMENT REMAIN IN PLACE AND WILL BE REMOVED AT A LATER DATE.

SOURCES:

- BASEMAP FROM ELECTRONIC FILE PROVIDED BY BORBAS SURVEYING & MAPPING, LLC. FILE NAME: 090609_BOUNDARY_2009-10-20SEND.DWG, DATED 10-13-09.
- BUILDING AREAS FROM HISTORICAL REPORTS TAKEN FROM TRC ELECTRONIC FILE NAMED: PHASE-1. DWG, FIGURE 5-1, DATED: 9-14-09.
- BUILDING FOOT PRINTS OBTAINED FROM H.H. WEST DRAWING TITLED: "JAMES RIVER CORPORATION RIEGAL GROUP", SERIAL NO. 67296B, DATED: 9-25-89.



INTERNATIONAL PAPER COMPANY AND
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CURTIS PAPERS SPECIALTY SITE
**PRE-DEMOLITION ENVIRONMENTAL REMOVALS
PROJECT COMPLETION REPORT**
**BUILDINGS WITH EXISTING
ASBESTOS-CONTAINING MATERIALS OR
REFRIGERANT CONTAINING EQUIPMENT -
ABOVE GRADE**



INTERNATIONAL PAPER COMPANY AND
 GEORGIA-PACIFIC CONSUMER PRODUCTS, LP
 CURTIS PAPERS SPECIALTY SITE
**PRE-DEMOLITION ENVIRONMENTAL REMOVALS
 PROJECT COMPLETION REPORT**

**BUILDINGS WITH EXISTING
 ASBESTOS-CONTAINING MATERIALS -
 BELOW GRADE**

