



114842

**PULVERIZING SERVICES
MOORESTOWN, BURLINGTON COUNTY, NEW JERSEY**

**ADMINISTRATIVE RECORD
INDEX OF DOCUMENTS
START FOUR**

1.0 FACTUAL INFORMATION

1.3 POLREPs

- P. 100001-100002 Pollution Report 49, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John J. Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, June 14, 1994.
- P. 100003-100004 Pollution Report 48, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John J. Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, August 16, 1991.
- P. 100005-100006 Pollution Report 47, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John J. Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, July 9, 1991.
- P. 100007-100009 Pollution Report 46, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John J. Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, June 28, 1991.
- P. 100010-100012 Pollution Report 45, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John J. Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, June 19, 1991.
- P. 100013-100016 Pollution Report 44, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John J. Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, June 11, 1991.

- P. 100017-100019 Pollution Report 43, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John J. Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, June 4, 1991.
- P. 100020-100022 Pollution Report 42, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, May 28, 1991.
- P. 100023-100025 Pollution Report 41, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, May 21, 1991.
- P. 100026-100028 Pollution Report 40, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, May 14, 1991.
- P. 100029-100031 Pollution Report 39, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, May 7, 1991.
- P. 100032-100034 Pollution Report 38, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, April 30, 1991.
- P. 100035-100037 Pollution Report 37, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, April 23, 1991.
- P. 100038-100041 Pollution Report 36, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, April 16, 1991.
- P. 100042-100045 Pollution Report 35, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, April 9, 1991.

- P. 100046-100048 Pollution Report 34, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, April 2, 1991.
- P. 100049-100051 Pollution Report 33, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, March 26, 1991.
- P. 100052-100054 Pollution Report 32, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, March 19, 1991.
- P. 100055-100057 Pollution Report 31, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, January 29, 1991.
- P. 100058-100060 Pollution Report 30, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, January 9, 1991.
- P. 100061-100063 Pollution Report 29, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, December 26, 1990.
- P. 100064-100066 Pollution Report 28, Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, December 19, 1990.
- P. 100067-100069 Pollution Report Twenty-seven (27), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, December 12, 1990.

- P. 100070-100072 Pollution Report Twenty-six (26), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, December 5, 1991.
- P. 100073-100075 Pollution Report Twenty-five (25), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, November 28, 1990.
- P. 100076-100078 Pollution Report Twenty-four (24), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, November 21, 1990.
- P. 100079-100081 Pollution Report Twenty-three (23), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, October 3, 1990.
- P. 100082-100084 Pollution Report Twenty-two (22), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, August 21, 1990.
- P. 100085-100087 Pollution Report Twenty-one (21), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, July 19, 1990.
- P. 100088-100090 Pollution Report Twenty (20), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, May 30, 1990.
- P. 100091-100093 Pollution Report Nineteen (19), Removal Action, Pulverizing Services, Inc., Moorestown, Burlington County, New Jersey, prepared by Mr. John Shaw, OSC, Removal Action Branch, Recipients: See Distribution List, April 19, 1990.

4.0 ENFORCEMENT DOCUMENTS

4.4 Administrative Orders/Consent Decrees

- P. 400001- Order: Administrative Order on Consent, In the matter of
400026 Pulverizing Services, Inc., PPG Industries, Inc., Respondents,
Proceeding Under Section 106(a) of the Comprehensive
Environmental Response, Compensation and Liability Act, as
amended, 42 U.S.C. §9606(a), Index No. II-CERCLA-80109,
March 31, 1989, (Attachment: Site maps.).

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: June 14, 1994

From: John J. Shaw

To: K. Callahan, EPA
R. Salkie, EPA
J. Frisco, EPA
M. Pane, EPA
D. Graham, EPA
R. Shinn, NJDEPE
TAT
Lt. L. DiGiovanne (Moorestown P.D.)

J. Marshall, EPA
R. Basso, EPA
G. Zachos, EPA
D. Karlen, EPA
V. Krisak, NJDEPE
J. Smolenski, NJDEPE
ERD, Washington (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: 49

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

- A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.
- B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.
- C. Potentially Responsible Parties (PRPs) have taken and are taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

2. ACTIONS TAKEN:

- A. Removal of shock sensitive materials, securing and stabilization of site took place in 1988.
- B. Under a UAO, fencing was completed by PRP in 1988.
- C. Under a 2nd UAO, starting in 1989, the same PRP performed a Site Investigation including a geophysical survey, soil sampling and groundwater sampling. A report on this work was submitted by the PRP. The plan for the second Site Investigation was also submitted and EPA's comments should be sent back to the PRP shortly. During this time frame, the PRP switched contractors.

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D. Under a 3rd UAO, starting in 1990, a group of 10 PRPs, working in buildings 5, 6 and 29 disposed of the hazardous materials therein and cleaned the interior of the buildings. All the field work under the UAO was completed on August 31, 1991. On November 5, 1992, EPA accepted the PRPs' Final Report, their check for \$419,000, and stated that "...Respondents have satisfactorily completed all activities pursuant to this Order."

3. NEXT STEPS:

A. The second Site Investigation is expected to start by late summer and will include the installation of site monitoring wells, the sampling and analysis of ground water, soils and sediments. A Site Investigation Report will be prepared by the PRP.

B. Based on the results of the second Site Investigation, in a removal type action, there is expected to be a limited removal of contaminated soils.

C. A Risk Assessment will be made, followed by a Remedial Investigation/Feasibility Study which will determine the long term remediation goals.

D. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION:

There have been no further costs attributable to EPA Removal Activities since Polrep #19.

FURTHER
POLREPS
FINAL POLREP _____ FORTHCOMING X SUBMITTED BY John J. Shaw
John J. Shaw, OSC
Removal Action Branch
DATE RELEASED 6/14/94

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: August 16, 1991

From: John Shaw, OSC

To: K. Callahan, EPA J. Marshall, EPA
R. Salkie, EPA R. Basso, EPA
J. Frisco, EPA G. Zachos, EPA
D. Graham, EPA P. Hick, EPA
L. Miller, NJDEP V. Krisak, NJDEP
L. Grayson, NJDEP ERD, Washington, (E-Mail)
Lt. L. Di Giovanne (Moorestown P.D.)
TAT

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 48

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On August 12, 1991

1. One trailer containing 86 drums (which includes 21 empty drums) with waste oil, flammable and combustible liquid,

100003

malathion solution was shipped to Natick MA., CHI's storage facility.

On August 13, 1991

1. A storage trailer was demobilized.
2. A trailer containing 11 non-hazardous harbor packs with asbestos debris and waste sludge was shipped to Baltimore MD., CHI's facility.
3. CHI resealed the opened overhead door of building 6 which had been forced open by an intruder.
4. All on site activities under the AOC have been completed.

B. OSC/TAT ACTIVITY

1. TAT and OSC will review the Final Report which is being prepared by the PRPs for the buildings.

3. **NEXT STEPS:**

- A. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- B. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- C. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- D. Continue to inform the State and Moorestown Officials and media of site activity.

4. **COST INFORMATION** (August 13, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John Shaw
John Shaw, OSC
Removal Action Branch
DATE RELEASED 8/16/91

100004

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: July 9, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanne (Moorestown P.D.)
TAT

R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 47

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

D. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

E. The final Site Operations Plan was received on April 2, 1991 and has been returned to the PRPs with comments.

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U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: June 28, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 46

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. **SITUATION:**

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

D. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

E. The "final" draft Site Operations Plan was received on April 2, 1991 and has been returned to the PRPs with comments.

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2. **ACTIONS TAKEN:**

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On June 19-26, 1991

1. CHI recleaned some minor areas which were pointed out by EPA during inspection.

2. CHI cleaned the outside area of buildings, decontaminated and demobilized equipment.

On June 24, 1991

1. Two 18 yards roll-offs containing non-hazardous trench sludge stabilized with cement dust were shipped to Baltimore, MD., CHI's TSD facility.

2. A 20 yards dump trailer containing non-hazardous debris was shipped to Baltimore, MD., CHI's TSD facility.

On June 25, 1991

1. A tank truck containing 3800 gallons of non-hazardous waste water from site storage tank and vacuum truck was shipped to Baltimore, MD., CHI's TSD facility.

On June 26, 1991

1. All the doors on the buildings were either sealed or locked. All locks are same. Keys are being distributed to the Fire Department, Police Department (Lt. L. Di Giovanne), RPM (Nigel Robinson), OSC (John Shaw) and TAT.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the remaining PRPs' activities.

3. **NEXT STEPS:**

A. Office trailer and equipment trailer will be demobilized on July 3, 1991.

B. Remaining drums of unknowns, debris and harbor packs will be shipped out on middle of July.

C. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

D. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

100008

E. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

F. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (June 26, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP ___ FORTHCOMING ___ X SUBMITTED BY John Shaw, OSC
Removal Action Branch

DATE RELEASED 6/28/91

100009

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: June 19, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 45

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

D. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

E. The "final" draft Site Operations Plan was received on April 2, 1991 and has been returned to the PRPs with comments.

100010

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On June 11-14, 1991

1. CHI completed cleaning the sumps, trenches, ceiling, walls and floor in building 5 to prepare for inspection.

On June 17, 1991

1. A tank truck containing 5100 gallons of waste water from the site vacuum truck and storage tank was shipped to Baltimore, MD., CHI's TSD facility.

2. CHI water washed the two outside horizontal cylindrical tanks.

On June 18, 1991

1. EPA, PRP and CHI inspected building 5 to see whether it had been cleaned to eliminate the imminent and substantial threat associated with direct contact with contaminants in the building. EPA agreed that the threat had been removed subject to minor cleaning of some areas.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. Reclean some minor areas which were pointed out by EPA during inspection.

B. Several drums of unknowns, harbor packs, non-hazardous roll-off and dump truck will be prepared for shipment.

C. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

D. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

E. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

F. Continue to inform the State and Moorestown Officials and media of site activity.

100011

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

DATE RELEASED

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: June 11, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanna (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 44

Site No.: 27
Response Authority: CERCLA
NPL Status: Non-NPL

1 SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #22 of the company facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

100013

informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On June 4, 1991

1. A tank truck containing 3000 gallons of waste water from PA 1 bucket elevator sump was shipped to Baltimore, MD., CHI's TSD facility.

2. Six (6) fan motors from the top of roof building 5 and poly sheeting from dust collectors were stripped down.

On June 5, 1991

1. A tank truck containing 5000 gallons of waste water from PA 1 bucket elevator sump was shipped to Baltimore, MD., CHI's TSD facility.

On June 6, 1991

1. A tank truck containing 5000 gallons of waste water from PA 2 bucket elevator sump was shipped to Baltimore, MD., CHI's TSD facility.

2. Four (4) 55-gallons drums of black greasy sludge were collected from the pit in boiler room.

3. CHI started the second wash of all back rooms in building

On June 7, 1991

1. CHI completed both the removal of sludge and the water wash of the sump of PA 1 conveyor bucket elevator.

2. A tank truck containing 5000 gallons of waste water from PA 1 bucket elevator sump and 3300 gallons storage tank was shipped to Baltimore, MD., CHI's TSD facility.

On June 8, 1991

1. CHI removed the sludge from two inside trenches of building 5 by "super sucker" truck.

100014

2. Three air samples for total dust, chlorinated pesticides and anilines/amines analysis were taken during sucking action.

On June 10, 1991

1. CHI completed both the removal of sludge and the water wash of the sump of PA 2 conveyor bucket elevator.

2. A dump truck containing 20 yards of hazardous metal debris, motors from pulverizing units and fan motors was shipped to Baltimore, MD., CHI's TSD facility.

3. Two air samples for total dust and anilines/amines analysis were taken during loading action.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. Complete the water wash of the inside trenches (this will be done when building 5 is washed).

B. Complete water wash building #5.

C. On June 18, 1991, the PRPs and EPA will inspect building 5 to see if the building was washed properly.

D. Several drums of unknowns, non-hazardous roll-off and dump truck will be prepared for shipment.

E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

G. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

H. Continue to inform the State and Moorestown Officials and media of site activity.

100015

4. COST INFORMATION (June 10, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY

John Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED June 11, 1991

100016

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: June 4, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanna (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 43

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

100017

informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On May 28, 1991

1. Room PA 3 in building 5 was washed.

On May 29, 1991

1. CHI inspected the inside trench of building 5 and estimated the volume of sludge in trench is about 100 x 4.75 x 0.58 feet deep of sludge (= 10.0 yards).

On May 30, 1991

1. CHI started to wash PA 1 room and pulverizing unit.
2. CHI flushed drains of PA 3, PA 4, and PA 5 from each end and sealed both ends with concrete.

On June 1, 1991

1. CHI removed the remaining sludge from trench to a roll-off and, then, high pressure water washed the trench.
2. CHI poured the liquid out from the malathion pipe, rinsed the pipe with bleach and water, and disposed the contents and pipe.

On June 3, 1991

1. CHI collected six (6) 16-gallon fiber incinerator drums of solid which contain carbaryl (164 ppm) from two outside cylindrical tanks.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

- A. Complete both the removal of sludge and the water wash of the

100018

inside trench (this will be done when building 5 is washed).

B. Complete both the removal of waste water, sludge and the water wash of the PA 1 and PA 2 conveyor bucket elevator sumps (this will be done when building 5 is washed).

C. Steam/water wash building #5.

D. Several drums of unknowns will be prepared for shipment.

E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

G. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

H. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (June 3, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY

John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED June 4, 1991

100019

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: May 28, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanne (Moorestown P.D.)
TAT

R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 42

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

100020

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On May 21, 1991

1. CHI totally secured all doorways of building 29.
2. CHI sealed openings and doorways with concrete and poly sheeting in building 5 to prepare for washing.
3. A tank truck containing 3783 gallons of non-hazardous wash waste water was shipped to Baltimore MD., CHI's TSD facility.

On May 22, 1991

1. Room PA 5 in building 5 was washed.
2. CHI inspected and found the size of each bucket elevator sump (PA 1, PA 2) is about 10.5 x 8.5 x 12 feet deep (= 8,000 gallons).

On May 24, 1991

1. The trench inside building 5 was opened in 5 places with a jack ^{hammer} for access.
2. Room PA 4 in building 5 was washed.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

- A. Complete both the removal of sludge and the water wash of the outside trench (this will be done when building 5 is washed).
- B. Complete both the removal of sludge and the water wash of the inside trenches (this will be done when building 5 is washed).

100021

C. Complete both the removal of waste water, sludge and the water wash of the PA 1 and PA 2 conveyor bucket elevator sumps (this will be done when building 5 is washed).

D. Steam/water wash building #5.

E. Several drums of unknowns will be prepared for shipment.

F. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

G. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

H. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

I. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (May 27, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP _____ FORTHCOMING X SUBMITTED BY John Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED May 29, 1991

100022

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: May 21, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 41

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

100023

informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On May 14, 1991

1. CHI totally secured all doorways of building 29.
2. CHI sealed openings and doorways with concrete and poly sheeting in building 5 to prepare for washing.

On May 15, 1991

1. One dump trailer was delivered on site for storing non-hazardous debris.
2. CHI cleaned the PA1 dust collector room on the top of roof building 5.

On May 16, 1991

1. Three air samples for total dust, chlorinated pesticides and anilines/amines analysis were taken by CHI during loading action.
2. CHI loaded non-hazardous debris to dump trailer.

On May 17, 1991

1. CHI cleaned the PA2 dust collector room on the top of roof building 5.

On May 20, 1991

1. CHI cleaned the PA2 pulverizing unit.
2. CHI cleaned the laboratory in building 5.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

- A. Complete the removal of sludge and wash water from the trenches (this will be done when building 5 is washed).
- B. Steam/water wash building #5.
- C. Several drums of unknowns will be prepared for shipment.
- D. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- E. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- F. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- G. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (May 20, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw OSC
Removal Action Branch

DATE RELEASED May 22, 1991

100025

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: May 14, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Baseo, EPA
G. Zachos, EPA
P. Hick, EPA
V. Kriesak, NJDEP
Lt. L. Di Giovanni (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 40

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1 SITUATION:

- A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.
- B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.
- C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.
- D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.
- E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.
- F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PPE ACTIVITY/BUILDINGS 5, 6 and 29.

On May 7, 1991

1. One 20 yards dump trailer containing hazardous material debris was shipped to Baltimore MD., CHI's TSD facility.

2. Three air samples for total dust, chlorinated pesticides and anilines/amines analysis were taken by CHI during loading action.

3. EPA, PPE and CHI inspected building 29 to see whether it had been cleaned to eliminate the imminent and substantial threat associated with direct contact with contaminants in the building. EPA agreed that the building was accepted as being clean to standard set in the work plan.

On May 8, 1991

1. CHI stripped down all (3) motors which were attached on PA1 and PA2 pulverizing units.

On May 9, 1991

1. CHI stripped rubber hoses, pipes and wires down from the walls, ceiling and scraped debris to the doorway to prepare for loading on next day.

On May 10, 1991

1. One 20 yards dump trailer containing non-hazardous pallets, debris and waste PPE was shipped to Baltimore MD., CHI's TSD facility.

2. Three air samples for total dust, chlorinated pesticides and anilines/amines analysis were taken by CHI during loading action.

On May 13, 1991

1. CHI sealed openings and doorways in building 29 for securing.

100027

2. CH1 started to clean building 5 from the air dust collector house on the top of roof.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRP's activities.

3. NEXT STEPS:

A. Complete both the removal of sludge and the water wash of the trench (this will be completed when building 5 is washed).

B. Steam/water wash building #5.

C. Several drums of unknowns will be prepared for shipment.

D. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

E. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

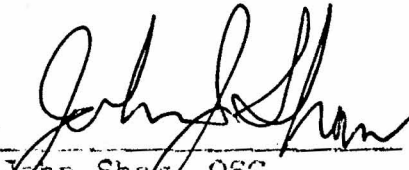
F. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

G. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (May 13, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY


John Shaw, OSC
Removal Action Branch

DATE RELEASED

May 15, 1991

100028

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: May 7, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 39

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

100029

informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On April 30, 1991

1. CHI performed a demonstration of washing PA2 pulverizing unit.

On May 1, 1991

1. CHI finished water washing building 29 to prepare for inspection on May 7, 1991.

On May 2, 1991

1. One 20 yards dump trailer containing non-hazardous air filter bags and debris was shipped to Baltimore MD., CHI's TSD facility.

2. Three air samples for total dust, chlorinated pesticides and anilines/amines analysis were taken by CHI during loading action.

On May 6, 1991

1. One 5000 gallons tank truck containing non-hazardous waste washing water was shipped to Baltimore MD., CHI's TSD facility.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. On May 7, 1991, the PRPs and EPA will inspect building 29 to see if the building was washed properly.

B. Complete both the removal of sludge and the water wash of the trench (this will be completed when building 5 is washed).

C. Air samples will be taken during the loading of debris at

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building 5, building 29 and the removal of sludge from the trench.

D. Steam/water wash building #5.

E. Several drums of unknowns will be prepared for shipment.

F. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

G. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

H. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

I. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (May 6, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED May 8, 1991

100031

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: April 30, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
G. Zachos, EPA
P. Hick, EPA
V. Krisak, NJDEP
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
D. Graham, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 38

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

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informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On April 23, 1991

1. EPA, PRP and CHI inspected building 6 to see whether it had been cleaned to eliminate the imminent and substantial threat associated with direct contact with contaminants in the building. EPA agreed that the threat had been removed.

2. One 5000 gallons tank truck containing non-hazardous waste washing water was shipped to Baltimore MD., CHI's TSD facility.

On April 26, 1991

1. After completing the first wash, CHI started the second washing in building 29.

On April 29, 1991

1. CHI totally secured all the openings in building 6 and locked the door.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. On May 7, 1991, the PRPs and EPA will inspect building 29 to see if the building was washed properly.

B. Complete both the removal of sludge and the water wash of the trench (this will be completed when building 5 is washed).

C. Air samples will be taken during the loading of debris at building 5, building 29 and the removal of sludge from the trench.

D. Steam/water wash building #5.

E. Several drums of unknowns will be prepared for shipment.

F. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

G. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

H. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

I. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (April 29, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED May 2, 1991

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: April 23, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
K. Basso, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)
D. Graham, EPA
Lt. L. Di Giovanni (Moorestown P.D.)
TAT

K. Salkie, EPA
J. Frisco, EPA
V. Krisak, NJDEP
G. Zachos, EPA

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 37

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the

100035

equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2 ACTIONS TAKEN:

A PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On April 16, 1991

1. CHI sealed the gaps in building 29 with tar and plastic sheeting to prevent water leaking out of building during high pressure water cleaning.

2. The OSC and TAT made a detailed study of the new odor at the site and attributed it to the open piping located near building 6, and the liquid that spilled out of the pipe when it was "broken". CHI was requested to shovel up the soil where the spill occurred and to cap the open ends of the piping. This was subsequently done.

On April 17, 1991

1. D.W.W. Enterprises Inc. (DWW), subcontractor of CHI, packed the asbestos pile in building 29 for shipment.

2. The OSC talked with Clark Hobby, the son of owner of Pulverizing Services about the 2 inch pipe (see above) emitting the odor. He identified it as a transfer line utilized in transferring malathion from railroad tank cars. In addition to malathion itself having a strong odor, an additive was added to make the odor more obnoxious. Sometimes Pulverizing services mixed in this additive.

On April 19, 1991

1. One 20 yard dump trailer containing cardboard, wood, waste PEE, and non-hazardous debris was shipped to Baltimore MD., CHI's TSO facility.

2. One vacuum truck was delivered on site.

3. CHI finished the clean-up in building 6.

On April 22, 1991

1. CHI started the first washing in building 29.

2. D.W.W. Enterprises Inc. (DWW), subcontractor of CHI, securely wrapped asbestos insulated piping with protective covering in building 5.

100036

3. After normal working hours, CHI removed most of the cement stabilized sludge from the concrete trench and high pressure water washed most of the trench. A very small amount of sludge remains to be removed.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

- A. On April 23, 1991, the PRPs and EPA will inspect building 6 to see if the building was washed properly.
- B. Complete both the removal of sludge and the water wash of the trench (this will be completed when building 5 is washed).
- C. Steam/water wash buildings #29, and #5.
- D. Several drums of unknowns will be prepared for shipment.
- E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- G. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- H. Continue to inform the State and Mooresboro Officials and media of site activity.

4. COST INFORMATION (April 22, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP _____ FORTHCOMING X SUBMITTED BY _____

John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED April 25, 1991

100037

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: April 16, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
V. Krisak, NJDEP
G. Zachos, EPA

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 36

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA

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informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On April 9, 1991

1. One 20 yards dump trailer containing hazardous material and debris was reshipped to Baltimore, MD., CHI's TSD Facility.
2. A 10,000 psi water blaster was delivered on site.
3. A sludge sample was taken by EPA/TAT from trench for TCLP BNA and pesticide analysis.
4. CHI removed most of the remaining sludge stabilized with kiln dust from the trench to a roll-off, after normal hours. This procedure had been agreed upon as per April 8, 1991 meeting.

On April 10, 1991

1. Two 20 yards dump trailers containing non-hazardous material; debris and hazardous material containing lead, respectively, were shipped to Baltimore, MD., CHI's TSD Facility.
2. One 18 yards roll-off containing non-hazardous sludge stabilized with kiln dust was shipped to Baltimore, MD., CHI's TSD Facility.
3. While loading debris with a front end loader outside the loading dock of building 29, a worker inadvertently and not knowingly broke into a section of 2 inch pipe and placed it into the dump truck. The next day, in the general area, a strong unpleasant odor was noticed. Two open ended 2 inch pipes, rising from beneath the soil, located near building 6 were emitting odors. When, the HNu was inserted in the pipe a reading of 200 units above background was noted. The ends of the pipes were stuffed with plastic.

On April 11, 1991

1. One 20 yards dump trailer containing non-hazardous material and debris was shipped to Baltimore, MD., CHI's TSD Facility.
2. A CHI worker, who was absent today, reported that he was

sick and that he had noted an odor yesterday. Subsequent medical examination under the auspices of CHI revealed that he had a virus. All other tests including a blood test (compared with his baseline for pesticides before starting to work at site) were negative.

On April 12, 1991

1. CHI finished the first washing of building 6.

On April 15, 1991

1. CHI started the second washing in the building 6.
2. One truck load of 40 drums containing corrosive liquids, poisonous solids, waste oil, hazardous waste liquids and solids, non-hazardous waste, and empty non-hazardous drums, was shipped to Natick, MA., CHI's storage facility.

B. OSC/TAT ACTIVITY

1. TAT and OSC continue to monitor the PRPs' activities.
2. On April 11, 1991, the OSC, responding to the concerns of the management of TeleSciences, the adjacent facility, requested ATSDR to prepare a report on the possible hazards to adjacent facilities that may be associated with the remaining cleanup actions, including the washing of the buildings. This report is expected in 2 weeks.

3. NEXT STEPS:

- A. Remove the remaining sludge from the concrete trench..
- B. Steam/water wash buildings #6, #29, and #5.
- C. Complete the review of "final" Draft Site Operations Plan for buildings.
- D. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- E. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- F. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- G. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (April 16, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP _____ FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED 4/19/91

100041

U.S. ENVIRONMENTAL PROTECTION AGENCY

SPECIAL POLREP

Date: April 9, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
V. Krisak, NJDEP
G. Zachos, EPA

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 35

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the

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equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

G. The "final" draft Site Operations Plan was received on April 2, 1991 and is presently being reviewed.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

On April 2, 1991

1. One 20 yards dump trailer containing hazardous material and debris was shipped to Baltimore, MD., CHI's TSD Facility.

2. CHI demonstrated high pressure steam washing on selected area of building 6.

On April 3, 1991

1. One 20 yards dump trailer containing hazardous material and debris was shipped to Baltimore, MD., CHI's TSD facility for transshipment to Pinewood,, SC. for disposal.

2. CHI performed a second demonstration of high pressure washing in building 6 on four (4) different areas: 2 steam washes; 1 steam wash and 1 cold water wash; 1 cold water wash; and 1 water with detergent wash.

On April 4, 1991

1. One tank trailer containing 4800 gallons of non-hazardous waste water and one 20 yard dump trailer containing non-hazardous debris and platform boards from building 29, were shipped to Baltimore MD., CHI's facility.

On April 5, 1991

1. One 18 yard roll-off containing non-hazardous waste sludge solidified with kiln dust was shipped to Baltimore MD., CHI's TSD facility.

2. CHI sealed all the gaps in the building 6 with tar and plastic sheet before washing.

3. One roll-off was delivered on-site.

4. In the morning, for the first time at the site, a sludge stabilization operation was performed in the large concrete sump, which was formerly used to collect pesticide wash downs from the pulverizing unit of building 5. This operation consisted of mixing the sludge with cement kiln dust, a process necessary in

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order to dispose the sludge in a landfill. After 2/3 rds of the sludge had been solidified, it was put in a rolloff for disposal, and the trench was covered with plastic. Subsequently, Lt. DiGiovanne of the Moorestown Police Dep't (MPD), Michael Ferrante of the Burlington County Health Department (BCHD) and the Manufacturing Engineering Manager of TeleSciences (which is located adjacent to the site), arrived on site to complain of odors believed to be emanating from the site. These odors had caused complaints of illness from TeleSciences' employees. The site was closed down until a meeting could be held on April 8, with the OSC from EPA being present. A volatile organics detector, HNu, commonly used at all hazardous waste sites was employed to determine if there were organics in the air. When placed in the trench, a reading of 0.8 units was obtained compared to a background of 0.4 units, which is relatively insignificant.

On April 8, 1991

1. The 9 am meeting was held with the same parties present as on April 5, plus the EPA OSC. The OSC pointed out that the problem was evidently related to the trench operation. Since previous analyses of the trench sludge had not indicated any hazardous materials, it was decided that normal operations would resume but that the rest of the sludge in the trench would be removed in the presence of the OSC, after TeleSciences working hours so that the odor would not cause any further problems.

2. A tank truck containing 4800 gallons of non-hazardous waste water which had been collected from PA1 and PA2 conveyer sumps, the sump in building 6, the sump at nearby decon. trailer and the water storage tank was shipped to Baltimore MD., CHI's TSD facility.

3. A dump trailer containing 20 yard hazardous material was returned to site and reshipped to Baltimore MD., after unloading about 10 waste PPE bags.

4. CHI started steam cleaning building 6.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. Remove the remaining sludge from the concrete trench.

B. The on-site roll-offs will be shipped out.

C. Steam/water wash buildings #6, #29, and #5.

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- D. PRPs to send for disposal approximately 40 remaining drums.
- E. Several drums of unknowns will be prepared for shipment.
- F. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- G. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- H. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- I. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (April 9, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED April 17, 1991

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: April 2, 1991

From: John Shaw, OSC

To: K. Callahan, EPA R. Salkie, EPA
R. Basso, EPA J. Frisco, EPA
L. Miller, NJDEP V. Krisak, NJDEP
ERD, Washington, (E-Mail) G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 34

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the

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equipment and buildings. This effectively replaced the conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On March 26, 1991, one 30 cubic-yard dump trailer containing non-hazardous steam-cleaned material and debris, and one 20 cubic-yards roll-off containing non-hazardous debris were shipped to Baltimore, MD., CHI's TSD Facility.

2. On March 26, 1991, one clean-up team started to move the debris down from the rafters in building 29.

3. One solid sample was taken by CHI from the rafters in building 29 for asbestos analysis on March 27, 1991.

4. On March 28, 1991, one water sample and one sludge sample were taken from the PA2 pulverizing unit's 12-foot sump and building 5's outside sump, respectively.

5. On March 28, 1991, CHI construction engineer inspected the support structure of the pulverizing units before dismantling parts of the units.

6. The roller conveyers attached to the walls of building 6 were cut down by CHI on March 28, 1991.

7. On April 1, 1991, one 20 cubic-yard dump trailer containing hazardous material and debris was shipped to Baltimore, MD., CHI's TSD facility for transshipment to Pinewood, SC. for disposal.

8. On April 1, 1991, CHI start to dismantle parts of the PA1 pulverizing unit in building 5.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. The on-site roll-offs will be shipped out.

B. Steam/water wash buildings #6, #29, and #5.

C. PRPs to send for disposal approximately 40 remaining drums.

D. Several drums of unknowns will be prepared for shipment.

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E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

G. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

H. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (April 2, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED 4/3/91

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: March 26, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
V. Krisak, NJDEP
G. Zachos, EPA

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 33

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the

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conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On March 20, 1991, one trailer containing 118 non-hazardous waste drums with silica powder, clay powder and titanium dioxide was shipped to Baltimore, MD., Clean Harbors Inc. (CHI) TSD facility for trans shipment to Pinewood, SC. for disposal.

2. On March 21, 1991, CHI took four (4) samples from separate locations; two (2) from PA2 pulverizer, one (1) from PA1 pulverizer and one (1) composite sample from the two outside horizontal cylindrical tanks.

3. On March 21, 1991, one 20 cubic-yards dump trailer containing non-hazardous pallets and one 20 cubic-yards roll-off containing non-hazardous pallets and debris were shipped to Baltimore, MD., CHI's TSD facility for trans shipment to Pinewood, SC. for disposal.

4. On March 22, 1991, water samples were taken by CHI from the drainage trench which is located behind building 5 and 6.

5. On March 22, 1991, one 35 cubic-yards dump trailer containing non-hazardous pallets was shipped to Baltimore, MD., CHI's TSD facility for trans shipment to Pinewood, SC. for disposal.

6. As March 22, 1991, CHI began to install dikes in the front of doors and cracks to prevent water leaking out of building during steam cleaning.

7. On March 25, 1991, two 35 cubic-yards dump trailers containing non-hazardous debris (from bldg. 29), lab debris, steam-cleaned material (from bldg. 6), and waste PPE were shipped to Baltimore, MD., CHI's TSD facility for trans shipment to Pinewood SC. for disposal.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. The on-site roll-offs will be shipped out.

B. Steam/water wash buildings #6, #29, and #5.

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- C. Several drums of unknowns will be prepared for shipment.
- D. PRPs to send for disposal approximately 40 remaining drums.
- E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- G. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- H. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (March 26, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED April 1, 1991

100051

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: March 19, 1991

From: John Shaw, OSC

To: K. Callahan, EPA
R. Basso, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
V. Krisak, NJDEP
G. Zachos, EPA

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 32

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. The draft Site Operations Plan submitted by the ten PRPs responsible for the cleanup of the buildings was approved conditionally, pending EPA's decision regarding the method for decontamination, on November 21, 1990. On January 24, 1991, EPA informed the PRPs that it accepted the PRPs' plan for washing the equipment and buildings. This effectively replaced the

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conditional approval. Mr. Basso, Chief NJ Compliance Branch (EPA) so informed the PRPs on February 20, 1991.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On March 18, 1991, Clean Harbor Inc. (CHI) contractor for PRP on-site began the site clean-up preparation. Breathing air cylinders were brought on-site.

2. On March 18, 1991, CHI took two (2) samples from the dust collector filter bags pile.

3. On March 19, 1991, one 20-cubic yards roll-off containing non-hazardous solid debris was shipped to Baltimore, MD., CHI's TSD facility.

4. On March 19, 1991, a bobcat and a forklift were delivered on-site.

5. On March 19, 1991, one team cut the pallets and stored in roll-off, the other team moved the debris out from lab at building 5.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. The on-site roll-offs will be shipped out.

B. Steam/water wash buildings #6, #29, and #5.

C. PRPs to send for disposal approximately 110 remaining drums.

D. Several drums of unknowns will be prepared for shipment.

E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

G. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

H. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (March 19, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED March 20, 1991

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: January 29, 1991

From: John Shaw, OSC

To: R. Caspe, EPA
R. Basso, EPA
L. Miller, NJDEP
ERD, Washington, (E-Mail)
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
V. Krisak, NJDEP
G. Zachos, EPA

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 31

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100055

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On January 10, 1991, the PRPs decided to temporarily cease the decontamination of the equipment and the buildings in order to discuss disposal alternatives for the debris and "steam-cleaned" equipment and to propose to EPA the method to be used for cleaning the buildings.

2. On January 10 and 11, 1991, CHI moved most of equipment off site to CHI's New Jersey office.

3. On January 15, 1991, TAT assessed the damage to the building across the road from area A because the police reported to the OSC that some windows were broken.

4. On January 22, 1991, CHI took six (6) samples from separate locations; trench, pallet pile in building 29, PPE waste pile and debris pile.

5. On January 28, 1991, one trailer containing 149 drums with corrosive, flammable, poisonous solid and liquid, and oxidizer was shipped to Natick, MA., CHI's storage facility.

6. As of January 29, 1991, approximately 110 drums with pesticide and unknown (approximately 10 drums) remain in building 29 and the storage trailer.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. The cleaning action will start again on the third week of February, 1991.

B. Vacuum and/or steam/water wash buildings #5, #6, and #29.

C. PRPs to send for disposal approximately 110 remaining drums.

D. Several drums of unknowns will be prepared for shipment when disposal analyses are received.

E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

G. Finalize SOP for the buildings.

H. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

I. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (January 9, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP____FORTHCOMING__X__SUBMITTED BY John Shaw, OSC
Removal Action Branch

DATE RELEASED Feb 6, 1991

100057

TRELA IS NOW

MILLER

U.S. ENVIRONMENTAL PROTECTION

PROGRESS POLREP

Date: January 9, 1991

From: John Shaw, OSC

To: R. Caspe, EPA R. Salkie, EPA
R. Basso, EPA J. Frisco, EPA
J. Trela, NJDEP V. Krisak, NJDEP
ERD, Washington, (E-Mail) G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 30

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100058

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On December 27, 1990, one 3,800-gallon waste water storage/settlement tank was delivered on site.

2. On December 28, 1990, heavy snow accumulated to a depth of about 6 inches; therefore, there was no action on site.

3. On January 3, 1991, one forklift delivered on site to replace the one which was out of order.

4. On January 3, 1991, CHI pumped decontamination water from 55-gallon drums to storage/settlement tank.

5. On January 4, 1991, the OSC received the amended draft SOP. The SOP is now being reviewed by OSC, RPM and TAT.

6. As January 7, 1991, CHI moved debris, swept, scraped the floor in building 6, and, cut down the "shower room" and rearranged the pallets in building 29.

7. On January 8 and 9, 1991, EPA, PRP and CHI sorted the "steamed cleaned" equipment into four (4) categories, possibly hazardous, cleaned, smelter and to be recleaned. The recleaned equipment will be resorted. The possibly hazardous equipment will be sampled and analyzed to determine method of disposal.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

A. Vacuum and/or steam/water wash buildings #5, #6, and #29.

B. PRPs will send the approximately 160 remaining drums for disposal.

C. Several drums of unknowns will be prepared for shipment when disposal analyses are received.

D. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.

E. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

F. Finalize SOP for the buildings.

G. Monitor the activities of the PRP when they resume work

H. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (January 9, 1991)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John Shaw, OSC
Removal Action Branch

DATE RELEASED Jan. 10, 1990

100060

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: December 26, 1990

From: John Shaw, OSC

To: R. Caspe, EPA
R. Basso, EPA
J. Trela, NJDEP
ERD, Washington, (E-Mail)
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT
R. Salkie, EPA
J. Frisco, EPA
V. Krisak, NJDEP
G. Zachos, EPA

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 29

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

- A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.
- B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.
- C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.
- D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.
- E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.
- F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On December 19, 1990, CHI's forklift was out of order, therefore, the clean-up schedule in building 29 will be delayed.
2. On December 20, 1990, one roll-off was delivered on site for storing more debris and the old one was left on site waiting for the analysis.
3. On December 21, 1990, two CHI personnel attempted to open the old overhead door at building 6, the overhead balance weight accidentally fell down and hit one of the workers on the head. The injured person was sent immediately to Memorial Hospital, Mt. Holly, NJ.
4. On December 26, 1990, the next working day after the accident, the PRP's contractor, CHI, improved their safety precaution and security.
5. On December 26, 1990, CHI crew began to remove debris, sweep and vacuum the floor in building 6.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

- A. A meeting with the PRPs will be held on the week of January 7, 1991, to discuss the disposal of the "steam cleaned" equipment.
- B. The amended SOP for buildings will be presented by the end of December, 1990.
- C. Continue steam/water wash of small pieces of equipment in the "Shower Room" of building 29.
- D. Vacuum and/or steam/water wash buildings #5, #6, and #29.
- E. Several drums of unknowns will be prepared for shipment when disposal analyses are received.
- F. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- G. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.

H. Finalize SOP for the buildings.

I. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

J. Continue to inform the State and Moorestown Officials and media of site activity.

4. COST INFORMATION (December 26, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED 12/28/90

100063

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROGRESS POLREP

Date: December 19, 1990

From: John Shaw, OSC

To: R. Caspe, EPA R. Salkie, EPA
R. Basso, EPA J. Frisco, EPA
J. Trela, NJDEP V. Krisak, NJDEP
ERD, Washington, (E-Mail) G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne (Moorestown P.D.)
TAT

SUBJECT: Pulverizing Services, Inc.
Moorestown, Burlington County, New Jersey

POLREP NO.: POLREP 28

Site No.: 2J
Response Authority: CERCLA
NPL Status: Non-NPL

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Buildings #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100064

2. ACTIONS TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On December 13, 1990, CHI started to steam/water wash the small pieces of equipment in the "Shower Room" of building 29 and then stored these in building 4.
2. On December 17, 1990, one trailer containing ninety (90) drums with pesticide was shipped to Natick MA., CHI's storage facility.
3. On December 18, 1990, one trailer containing eighty nine (89) drums with pesticide, perchloric acid, flammable, corrosive substance and waste oil was shipped to Natick Ma., CHI's storage facility.
4. On December 18, 1990, CHI rearranged the debris in the building 20 to obtain more space for storing the cleaned small pieces of equipment.
5. As of December 19, 1990, approximately 265 drums with pesticide and unknown stored in the building 29.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

3. NEXT STEPS:

- A. The amended SOP for buildings will be presented by the end of December, 1990.
- B. Continue steam/water wash of small pieces of equipment in the "Shower Room" of building 29.
- C. Vacuum and/or steam/water wash buildings #5, #6, and #29.
- D. Several drums of unknowns will be prepared for shipment when disposal analyses are received.
- E. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- F. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- G. Finalize SOP for the buildings.
- H. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- I. Continue to inform the State and Moorestown Officials and

media of site activity.

4. COST INFORMATION (December 19, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED 12/19/90

100066

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: December 12, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: R. Caspe, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Kriesak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty-seven (27)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, lab chemicals, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

I. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100067

II. ACTION TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On December 5, 1990, several pounds of wood preservative pentachlorophenol (< 5%), which is a dioxine precursor, were found in the laboratory of building 5. C.H.I. will send it for incineration.

2. On December 5, 1990, 29 unknown chemical containers were found and fingerprinted. One composite sample was collected and analyzed.

3. On December 10, 1990, C.H.I. moved debris out from building 29 and consolidated it in the roll-off. The debris will be sent to a secure hazardous landfill.

4. On December 11, 1990, C.H.I. Project Manager made a video of the pulverizing heavy equipment in building 5 and of the clean-up method demonstration: vacuum, sweep, and high pressure steam clean.

5. On December 12, 1990, a meeting was held on-site by the representatives of Union Carbide (PRP), C.H.I., EPA, and the property owner. Tentative decisions were made as follows:

- a) Crushed debris and cardboard will be sent to hazardous landfill.
- b) Pulverizers, tanks, lockers, scales and other machines will be cleaned in place.
- c) Buildings will be vacuum and/or steam clean.
- d) The contaminated steam water will be collected and reused.
- e) C.H.I. will take water and sludge samples from the trench.
- f) C.H.I. will take samples in the building after cleaning as per EPA direction.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

2. The OSC is consulting with the ATSDR and ATSDR will comment on building clean-up work.

100068

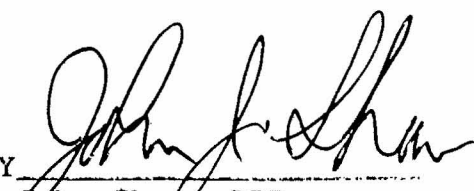
III. FUTURE PLANS AND RECOMMENDATIONS:

- A. The amended S.O.P for buildings will be presented by the end of December, 1990.
- B. Start steam/water wash of small pieces of equipment in the "shower room" of building 29.
- C. Vacuum and/or steam/water wash buildings #5, #6, and #29.
- D. Dispose remaining pesticide drums which are now ready for shipment.
- E. Several drums of unknowns will be prepared for shipment when disposal analyses are received.
- F. Discuss SOP Phase II for the soil with PRP and have PRP submit revised SOP Phase II.
- G. Discuss the review of SIR Phase I for the soil with PRP and have PRP submit revised SIR Phase I.
- H. Finalize SOP for the building.
- I. Monitor the activities of the PRP when they resume work on the Phase II soil operations.
- J. Continue to inform the State and Moorestown Officials and media of site activity.

IV. FINANCIAL STATUS (December 12, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY


John Shan, OSC
Removal Action Branch

DATE RELEASED 12/14/90

100069

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: December 5, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: R. Caspe, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
L. Miller, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty-six (26)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, lab chemicals, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

I. SITUATION:

- A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.
- B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.
- C. Chemicals and pesticides are currently stored in Buildings #5, 6, and 29 of the defunct facility.
- D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.
- E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.
- F. Ten PRPs, under an AOC with EPA, have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, 6 and 29.

100070

II. ACTION TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On November 30, 1990, one trailer containing 116 drums with pesticide were shipped to Natick MA., CHI's storage facility.
2. On November 30, 1990, all laboratory chemicals in building #5 were packed in drums and moved to building #29.
3. On December 4, 1990, two bag houses containing 148 and 25 filter bags, respectively, on top of building #5 were cleaned. All bags were moved out and stored in plastic bags. The dust on the walls and floors of the bag houses was shoveled and cleaned.
4. On December 4, 1990, all remaining drums in buildings #5 and 6 were moved to building #29.
5. On December 5, 1990, unknown chemicals were fingerprinted, packed, labeled, and moved into storage trailer.
6. On December 5, 1990, the lighting system was set up inside building #5.
7. As of December 5, 1990, approximately 400 additional drums were packed and ready to ship out.

B. OSC/TAT ACTIVITY

1. TAT and the OSC will continue to monitor the PRPs' activities.
2. The OSC is consulting with the ATSDR. The ATSDR will comment on building clean-up work on December 10.

III. FUTURE PLANS AND RECOMMENDATIONS:

- A. Build a machine shower room in building #29 for steam washing all machines that are left in buildings #5, 6 and 29.
- B. Vacuum buildings #5, 6, and 29.
- C. Discuss SOP Phase II with PRP and have PRP submit revised SOP Phase II.
- D. Discuss the review of SIR Phase I with PRP and have PRP submit revised SIR Phase I.
- E. Finalize SOP for the building.
- F. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

G. Continue to inform the State, Moorestown Officials and media of site activity.

4. FINANCIAL STATUS (November 28, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED Dec. 6, 1990

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: November 28, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: R. Caspe, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty-five (25)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, lab chemicals, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100073

2. ACTION TAKEN:

A. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

1. On November 26, 1990, Clean Harbors, Inc. (CHI), staff members began labpacking chemicals located in building #5.

2. As of November 27, 1990, three quarters of the laboratory chemicals from one of two laboratories in building #5 were packed in 16 drums and moved to building #29 for temporary storage.

3. On November 27, 1990, all of the building's openings (doors) were covered by plastic sheeting to prevent potentially hazardous dust from coming out of the building, while the crew worked (with proper ppe) inside.

4. As of November 28, 1990, 168 fiber drums which contain methoxychlor, Enide, Sevin, Botran, Malathion, Gardona, and pentachloronitrobenzene were moved from building #29 to a storage trailer.

B. OSC/TAT ACTIVITY

1. TAT and OSC will continue to monitor the PRPs' activities.

2. OSC has asked the Agency for Toxic Substances and Disease Registry (ATSDR) to comment on the PRP plan for cleaning the buildings' walls and floors.

3. On November 27, 1990, the OSC visited all property owners bordering on the site and distributed the Fact Sheet.

4. The OSC talked to D.W. Cooper, representative of Union Carbide (PRP), and emphasized the clean-up requirements.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. The PRP's contractor, CHI, will ship the waste storage trailer containing the pesticide drums to 10 Mercer Road, Natick, MA., 01760, CHI's storage facility while waiting for approval from the disposal facility.

B. CHI will "labpack" all the laboratory chemicals and ship them off site.

C. Vacuum buildings #5, #6, AND #29.

D. Remove filter bag form the top of building #5.

E. Discuss SOP Phase II with PRP and have PRP submit revised SOP Phase II.

F. Discuss the review of SIR Phase I with PRP and have PRP submit revised SIR Phase I.

G. Finalize SOP for the building.

H. Monitor the activities of the PRPs when they begin work on the buildings cleanup.

I. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

J. Continue to inform the State and Moorestown Officials and media of site activity.

4. FINANCIAL STATUS (November 28, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED Dec. 4, 1990

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: November 21, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: R. Caspe, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty-four (24)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, lab chemicals, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100076

2. ACTION TAKEN:

A. PRP Activity, All Areas Except Buildings

i. PPG Contractor, Paul C. Rizzo Associates (PCR), submits draft Site Operations Plan (SOP) for Phase II on April 16, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

ii. PPG Contractor, Paul C. Rizzo Associates submits draft Site Investigation Report for Phase I on May 25, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

iii. On November 20, 1990, PPG cuts grass between Crider Ave. and the buildings as requested by the OSC. The fire department had brought this to the OSC's attention.

B. PRP ACTIVITY/BUILDINGS 5, 6 and 29.

i. On November 7, 1990, PRPs sent EPA analytical data on wipe samples.

ii. On November 16, 1990, Clean Harbors Inc. contractor for PRPs on-site, began site clean-up preparation. Breathing air cylinders (for Level "B") and dump truck (roll-off) were brought on-site.

iii. The OSC was told by police that a door on a trailer was opened. TAT closed that door as OSC requested.

iv. On November 19, 1990, a forklift (high lift) was delivered on-site. Wet decontamination trailer was put in service .

v. On November 19, 1990, D.W. Cooper, representative of Union Carbide (PRP) was on-site to supervise clean-up activities.

vi. OSC requested PRPs to measure the dust up and down wind and record the wind direction on a regular basis.

C. OSC/TAT ACTIVITY

i. TAT and OSC continue to monitor the PRPs' activities.

ii. OSC helped prepare a Fact Sheet which will be distributed on November 27.

iii. OSC has asked the Agency for Toxic Substances and Disease Registry (ATSDR) to comment on the PRP plan for cleaning the buildings' walls and floors.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. Distribute the Fact Sheet on November 27, to the township and to all property owners bordering on the site. The OSC will be accompanied by a representative of the group of 10 PRPs.

B. The PRPs' contractor, Clean Harbors, Inc. (CHI) will "labpack" all the laboratory chemicals and ship them off site in the next few weeks. This activity will commence on November 26, 1990.

C. Discuss SOP Phase II with PRP and have PRP submit revised SOP Phase II.

D. Discuss the review of SIR Phase I with PRP and have PRP submit revised SIR Phase I.

E. Finalize SOP for the building.

F. Monitor the activities of the PRPs when they begin work on the buildings cleanup.

G. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

H. Continue to inform the State and Moorestown Officials and media of site activity.

4. FINANCIAL STATUS (July 20, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FURTHER
POLREPS
FINAL POLREP FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED 11/26/90

100078

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: October 3, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: R. Caspe, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty-three (23)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, lab chemicals, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100079

2. ACTION TAKEN:

A. PRP Activity, All Areas Except Structures

i. PPG Contractor, Paul C. Rizzo Associates (PCR), submits draft Site Operations Plan (SOP) for Phase II on April 16, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

ii. PPG Contractor, Paul C. Rizzo Associates submits draft Site Investigation Report for Phase I on May 25, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

B. PRP ACTIVITY/BUILDINGS 5,6 and 29.

i. On September 17, the PRPs PSI Technical Committee (composed of representatives from American Cyanamid, Upjohn and Union Carbide) met with EPA's RPM and OSC to discuss the comments made by EPA on the draft SOP submitted by the PRPs. The PRPs responded with an Addendum to the draft SOP. The Addendum is now under study by EPA and a response will be made shortly. After the response is made by EPA, and it is included in the final SOP, cleanup operations can begin.

ii. At the meeting, it was agreed that the contractor Clean Harbors, Inc. will begin a partial mobilization on September 27 to install some trailers, arrange for utilities and to make a test on the effectiveness of vacuuming as the method for decontaminating the buildings.

iii. The OSC, TAT and a PRP witnessed the vacuuming demonstration on October 1, 1990. Analytical results of the sampling operation are due in two weeks. The EPA will then make a decision regarding the effectiveness of the vacuuming and this will be included in the final SOP.

iv. The PRP, on September 28, briefed various town agencies such as the fire department on the activities which will be going on at the site.

v. The PRP, the contractor and the OSC had a meeting with representatives of various town agencies, including the Town Manager to describe the activities which will be going on at the site and to answer questions posed by these officials.

C. OSC/TAT ACTIVITY

i. The Moorestown Fire Department, through Lt. DiGiovane of the Police Department, requested EPA to have the grass and high vegetation, which surrounds the trailers at the Crider St. entrance, cut because it constitutes a fire hazard. The OSC has transmitted this request to the PRP, PPG Industries

and is awaiting a reply. If the PRP does not take timely action, the OSC will investigate taking action under the still existing Action Memorandum.

ii. OSC and TAT assisted Clean Harbors, Inc. in the selection of five (5) wipe sampling locations. The OSC and TAT observed the vacuuming of the walls and machinery, as well as wipe sampling before and after the vacuuming.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. Discuss SOP Phase II with PRP and have PRP submit revised SOP Phase II.

B. Discuss the review of SIR Phase I with PRP and have PRP submit revised SIR Phase I.

C. Finalize SOP for the building.

D. Monitor the activities of the PRPs when they begin work on the buildings cleanup.

E. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

F. Continue to inform the State and Moorestown Officials and media of site activity.

4. FINANCIAL STATUS (July 20, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FINAL POLREP _____ FURTHER
POLREPS
FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED October 4, 1990

100081

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: August 21, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: R. Caspe, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty-two (22)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, lab chemicals, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft Site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100082

2. ACTION TAKEN:

A. PRP Activity, All Areas Except Structures

i. PPG Contractor, Paul C. Rizzo Associates (PCR), submits draft Site Operations Plan (SOP) for Phase II on April 16, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

ii. PPG Contractor, Paul C. Rizzo Associates submits draft Site Investigation Report for Phase I on May 25, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

B. PRP ACTIVITY/BUILDINGS 5,6 and 29.

i. An Administrative Order on Consent (AOC) was signed by the Regional Administrator of EPA Region II on March 23, 1990. Ten PRPs have signed the AOC. Union Carbide is the lead PRP. Jim Baker is the contact.

ii. On May 22, the draft SOP was submitted, on time for the buildings cleanup. The TAT and OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York. EPA comments which are to be included in SOP, sent to PRP on August 24, 1990.

C. OSC/TAT ACTIVITY

OSC kept in contact with Enforcement RPM on status of job.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. Discuss SOP Phase II with PRP and have PRP submit revised SOP Phase II.

B. Discuss the review of SIR Phase I with PRP and have PRP submit revised SIR Phase I.

C. PRPs to meet with EPA in September to discuss EPA's amendments to draft SOP for buildings.

D. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

E. Monitor the activities of the PRPs when they begin work on the buildings cleanup.

F. Continue to inform the State and Moorestown Officials and media of site activity.

4. FINANCIAL STATUS (July 20, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FINAL POLREP _____ FURTHER
POLREPS
FORTHCOMING X SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED 8/21/90

100084

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: July 19, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: R. Caspe, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty-one (21)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

1. SITUATION:

- A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.
- B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.
- C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.
- D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.
- E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.
- F. Ten PRPs under an AOC with EPA have submitted a draft site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100085

2. ACTION TAKEN:

A. PRP Activity, All Areas Except Structures

i. PPG Contractor, Paul C. Rizzo Associates (PCR), submits draft Site Operations Plan for Phase II on April 16, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

ii. PPG Contractor, Paul C. Rizzo Associates submits draft Site Investigation Report for Phase I on May 25, 1990. The TAT and the OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

B. PRP ACTIVITY/BUILDINGS 5,6 and 29.

i. An Administrative Order on Consent (AOC) was signed by the Regional Administrator of EPA Region II on March 23, 1990. Ten PRPs have signed the AOC. Union Carbide is the lead PRP. Jim Baker is the contact.

ii. On May 22, the draft Site Operations Plan was submitted, on time for the buildings cleanup. The TAT and OSC commented on the draft and discussed with ORC and Enforcement RPM at the July 18, 1990 meeting at EPA Region II, New York.

C. OSC/TAT ACTIVITY

The TAT and the OSC commented on the draft SOP Phase II for the contaminated soil. Discussed with ORC and Enforcement RPM.

The TAT and the OSC commented on the draft SIR Phase I for the contaminated soil. Discussed with ORC and Enforcement RPM.

The TAT and the OSC commented on the draft SOP for the buildings. Discussed with ORC and Enforcement RPM.

On July 17, the TAT and OSC were at the site to check the site security. Everything seemed normal.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. Discuss SOP Phase II with PRP and have PRP submit revised SOP Phase II.

B. Discuss the review of SIR Phase I with PRP and have PRP submit revised SIR Phase I.

C. Discuss draft SOP for the buildings with PRPs and have PRPs submit revised SOP.

D. Monitor the activities of the PRP when they resume work on the Phase II soil operations.

E. Monitor the activities of the PRPs when they begin work on the buildings cleanup.

F. Continue to inform the State and Moorestown Officials and media of site activity.

4. FINANCIAL STATUS (July 20, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FINAL POLREP _____
FURTHER
POLREPS
FORTHCOMING X

SUBMITTED BY

John Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED

July 23, 1990

100087

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: May 30, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: S. Luftig, EPA
R. Salkie, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. Di Giovanne
(Moorestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Twenty (20)
INCIDENT NAME: Pulverizing Services, Inc.
SITE/NO.: 2J
NPL STATUS: Non-NPL
POLLUTANT: Pesticides, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Ten PRPs under an AOC with EPA have submitted a draft site Operation Plan for the cleanup and removal of stored materials in buildings #5, #6 and #29.

100088

2. ACTION TAKEN:

A. PRP Activity, All Areas Except Structures

i. PPG Contractor, Paul C. Rizzo Associates (PCR), submits draft Site Operations Plan for Phase II on April 16, 1990. It is now being reviewed by EPA.

ii. PPG Contractor, Paul C. Rizzo Associates submits draft Site Investigation Report for Phase I on May 25, 1990, eight days late. It is now being reviewed by EPA.

B. PRP ACTIVITY/BUILDINGS 5,6 and 29.

i. An Administrative Order on Consent (AOC) was signed by the Regional Administrator of EPA Region II on March 23, 1990. Ten PRPs have signed the AOC. Union Carbide is the lead PRP. Jim Baker is the contact.

ii. On April 11, the PRPs sent 4 contractors to the site to tour the buildings with the OSC so that each could submit a bid to do the cleanup.

iii. On May 3, the OSC was told that Clean Harbors would be the cleanup contractor.

iv. On May 22, the draft Site Operations Plan was submitted, on time. It is now being reviewed by EPA.

C. OSC/TAT ACTIVITY

The TAT and the OSC were at the site to guide the PRPs potential contractors through the buildings. At the same time they checked site security. Everything seemed normal.

The TAT and the OSC are reviewing and commenting on the draft SOP Phase II for the contaminated soil.

The TAT and the OSC are reviewing and commenting on the draft SIR Phase I for the contaminated soil.

The TAT and the OSC are reviewing and commenting on the draft SOP for the buildings.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. Complete the review of SOP Phase II.

B. Complete the review of SIR Phase I.

C. Complete the review of draft SOP for the buildings.

D. Monitor the activities of the PRP as they resume work on the Phase II soil operations.

E. Monitor the activities of the PRPs when they begin work on the buildings cleanup.

F. Continue to inform the State and Moorestown Officials and media of site activity.

4. FINANCIAL STATUS (May 31, 1990)

The financial status of the Removal Action is essentially the same as stated in Polrep #19 since this is now all PRP activity.

FINAL POLREP _____
FURTHER
POLREPS
FORTHCOMING X

SUBMITTED BY

John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED

May 30, 1990

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: April 19, 1990

Region II
Removal Action Branch
Edison, New Jersey 08837

TO: W. Muszynski, EPA
S. Luftig, EPA
R. Salkie, EPA
J. Marshall, EPA
R. Basso, EPA
J. Frisco, EPA
J. Trela, NJDEP
V. Krisak, NJDEP
ERD, Washington,
(E-Mail)
G. Zachos, EPA
D. Graham, EPA
Lt. L. DiGiovanne
(Morrestown P.D.)
TAT

(201) 548-8730 - Commercial and FTS
24 Hour Emergency

POLREP NO.: Nineteen (19)
INCIDENT NAME: Pulverizing Services, Inc.
POLLUTANT: Pesticides, asbestos
CLASSIFICATION: Major
SOURCE: Stored Chemicals and Pesticides
LOCATION: Moorestown, Burlington County, New Jersey
AMOUNT: 1000 Containers
WATER BODY: Pennsauken Creek

1. SITUATION:

A. Pulverizing Services is an inactive pesticide pulverizing and blending facility located in Moorestown, New Jersey.

B. Contaminated run-off, discharges to soil, storm and sanitary sewers, and airborne releases are alleged to have occurred.

C. Chemicals and pesticides are currently stored in Building #5, #6, and #29 of the defunct facility.

D. The threat of fire, explosion and direct contact is imminent and significant. A large area of the township would be affected.

E. Potentially Responsible Parties (PRPs) are now taking timely and appropriate action at the site under Administrative Orders on Consent (AOC) with EPA.

F. Financial Status remains the same since EPA is now performing oversight and all oversight costs incurred by EPA and all of its agents contractors and employees are reimbursable by the PRPs.

100091

2. ACTION TAKEN:

A. PRP Activity, All Areas Except Structures

PPG Industries (PPG) Contractor, Paul C. Rizzo Associates (PCR), submits final Phase I Site Operations Plan (SOP) and Quality Assurance/Quality Control (QA/QC) Plan.

During the week of December 4, 1989, PCR installs stone roadway extending from Crider Avenue to a plastic lined decontamination pad constructed on Area C, north of the alleged landfill. Setup of site trailers, utilities and staking of drilling locations established.

John Mathes & Associates, Winsdor, NJ began drilling December 11 and completes 20 soil borings and 6 monitoring wells, the week of January 3. PCR transmits samples obtained from borings for laboratory analyses. TAT monitors field activities. TAT obtains 4 split and two duplicate samples and submits to CLP labs for TCL-Parameters, namely: volatiles, semivolatiles, PCBs/pesticides, metals and cyanides. Non TCL-Parameters include seven, PCNB and malathion.

Monitoring wells were developed the week of January 3, 1989. No split samples were taken by EPA for this first round.

Draft SOP, Phase II submitted on April 18, 1990. Phase II addresses those portions of the study area not covered under Phase I, namely a limited portion of Area B.

B. PRP ACTIVITY, BUILDINGS #5, #6 and #29.

On March 23, 1990, the ten PRPs, American Cyamamid Co., Chevron Chemical, E.I. Dupont DeNemours, Monsanto Co., Occidental Chemical Corporation, Olin Corporation, Pulverizing Services, Shell Chemical Co., Union Carbide Corporation and the Upjohn Co. signed the Administrative Order on Consent to remediate buildings #5, #6 and #29.

On April 11, 1990, contractors for the PRPs visited the site to obtain data for submitting a bid. EPA and TAT were at site to insure safety procedures were followed and that site security was maintained

The draft SOP is due May 22, 1990. Mr. James Baker of Union Carbide is the Facility Coordinator.

C. OSC/TAT ACTIVITY

On-site activities have consisted of security checks, waste storage inspections and PRP related activities.

As mentioned under Par. B above, EPA and TAT were at site on April 11, 1990 in a monitoring capacity.

3. FUTURE PLANS AND RECOMMENDATIONS:

- A. Continue to follow and monitor all PRP activities.
- B. Continue to inform the State and Moorestown Officials and the media of site activities.
- C. Review Draft SOP, Phase II and submit comments.

FURTHER
POLREPS
FINAL POLREP _____ FORTHCOMING ☒ SUBMITTED BY John J. Shaw
John Shaw, OSC
Removal Action Branch

DATE RELEASED 4/21/90

100093

3-31-89

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

-----x
: IN THE MATTER OF :
: PULVERIZING SERVICES, INC. :
: :
PPG INDUSTRIES, INC., : ADMINISTRATIVE ORDER ON CONSENT
: :
Respondent : Index No. II-CERCLA-80109
: :
Proceeding Under Section 106(a):
of the Comprehensive Environ- :
mental Response, Compensation :
and Liability Act, as amended, :
42 U.S.C. §9606(a). :
-----x

JURISDICTION

1. This Administrative Order on Consent (Order) is issued to PPG Industries, Inc. by the United States Environmental Protection Agency (EPA) pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, 42 U.S.C. §9606(a). This authority was delegated to the Administrator of the EPA by Executive Order 12580, dated January 23, 1987, and duly redelegated to the Regional Administrator, EPA Region II. Notice of this Order has been given to the New Jersey State Department of Environmental Protection (DEP) as required by 42 U.S.C. §9606(a).

DEFINITIONS

2. As used in this Order, unless the context clearly requires some other meaning, the following terms shall have the following meanings:

A. EPA shall mean the United States Environmental Protection Agency.

B. DEP shall mean the New Jersey Department of Environmental Protection.

C. PPG shall mean PPG Industries, Inc., the Respondent under this Order, which has its headquarters and principal place of business located at One PPG Place, Pittsburgh, Pennsylvania 15272; such term also includes all agents, successors, subsidiaries and assigns who perform or who are charged with performing any activities pursuant to this Order.

400001

D. Pulverizing Services shall mean Pulverizing Services, Inc. which has its principal place of business at 4325 Lear Avenue, North Charleston, South Carolina 29418, and which, upon information and belief, is the present owner of the Site and all structures located thereon which are the subject of this Order.

E. The Site shall mean the real property (and all structures and containers thereon) which is located at 332 New Albany Road, Moorestown, New Jersey and which consists of Lots 21E, 21F, 21L and 21A.1 in Block 202 and Lots 4, 4A and 5A in Block 214 on the current Tax Assessment Map for the Township of Moorestown, New Jersey; and shown as Areas A, B and C on Attachment No. 1 to this Order.

F. CERCLA shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §9601 et seq.

G. Hazardous substance(s) shall be used as that term is defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

H. Facility Coordinator shall mean the person designated by PPG, which person shall be charged with the duty of being at all times knowledgeable of the performance of all work performed pursuant to this Order.

I. On-Scene Coordinator (OSC) shall mean the person designated by EPA to be responsible for on-scene monitoring of all actions and activities required pursuant to this Order, and for receipt of all items submitted to EPA under this Order. The OSC shall additionally be responsible for coordinating and directing any EPA removal actions, as defined in the National Contingency Plan, which may be conducted at the Site.

J. National Contingency Plan (NCP) shall mean the National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R. Part 300, and all amendments thereto.

K. Study Area shall include all of Areas A and C, plus a limited portion of Area B, exclusive of structures or their interiors, as shown on Attachment 1. The Study Area portion of Area B includes the area behind the garage and farm house, the stormwater runoff ditch along the railroad track, and the stressed area in the southeast corner of Area B. In addition, the intermittent stream emanating from the northwest corner of Area C, the areas impacted by stormwater runoff from the northeast side of Area A, and any other offsite areas which may have been impacted by hazardous substances migrating from Areas A, B, and C are included in the Study Area.

400002

L. Phase I Study Area shall include all suspected disposal areas within the Study Area where previous EPA sampling indicates the presence of dichloro-diphenyl compounds (DDD, DDE and DDT) in excess of 100 parts per million (ppm) (ug/g), as shown in Attachment 2. It also includes locations in the Study Area where increased reflectivity, or anomalies have been identified through a geophysical survey (Ground Penetrating Radar) indicating suspected disposal areas, as shown in Attachment 3.

M. Phase II Study Area shall include all those portions of the Study Area that are not included in the Phase I Study Area.

N. Oversight Costs shall mean those direct and indirect costs for activities to which EPA, or its contractors, agents or representatives perform associated with development, issuance and implementation of this Order. Such activities include:

- a. review of the Scope of Work prepared by PPG and attached to this Order;
- b. document preparation, review, or comment to document(s) prepared pursuant to this Order;
- c. organization and participation in technical meetings between EPA and PPG;
- d. conducting of any required community relations tasks, including briefing of state and local officials and preparation of press releases or fact sheets for the public with respect to the activities to be performed under this Order;
- e. on-site presence and periodic Site inspections to oversee the implementation of this Order;
- f. environmental monitoring, if deemed necessary by EPA to determine PPG's compliance with this Order;
- g. taking of confirmatory samples, if deemed necessary by EPA;
- h. certification that the work under this Order has been completed; and
- i. EPA activities associated with obtaining access to off-site properties, if required for the implementation of this Order.

PARTIES BOUND

3. This Order shall apply to and be binding upon PPG, and its agents, successors, assigns, and subsidiaries.

FINDINGS

4. PPG is a person as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. §9601(21).

5. PPG, known then as the Pittsburgh Plate Glass Company, acquired title to the Site (or portion(s) thereof) on or about December 30, 1948 and held title to some or all of the Site until on or about November 29, 1963.

6. During the period of time extending from on or about December 30, 1948 to on or about November 29, 1963, PPG operated a business at the Site which routinely received and handled pesticides, herbicides, fungicides and/or other chemicals, including the following: DDT, aldrin, malathion, dieldrin, lindane, rotenone and sevin.

7. During the period of time extending from on or about December 30, 1948 to on or about November 29, 1963, hazardous substances, including DDT, were disposed of in trench areas and/or were deposited onto the land at various locations at the Site; studies by DEP in 1985 confirmed the presence of at least four (4) trench areas at the Site which contained hazardous substances.

8. Investigations by DEP personnel in June 1985 and August 1985 indicated that the following contaminants were present at the Site: DDT, DDE, sevin, hexachlorophene, malathion and methoxy-chlor.

9. On June 12, 1985, DEP extracted soil samples from the Site. Analyses of these samples indicated the presence of alpha-BHC, DDT and DDD.

10. In October 1987, surveys by EPA indicated that the following conditions, among others, existed at the Site:

- a. DDT, DDE, lindane, dieldrin and other hazardous substances and pollutants and contaminants were detected in the soil at the Site;

400004

- b. DDT was present in the soil at the Site at levels up to 2200 ppm and in the buildings at the Site at levels up to 2400 ppm; and
- c. the Site is presently unoccupied and could be entered by trespassers.

11. The Site is located in a populated industrial park; residences are located within 200 feet of the Site; a former grammar school and recreational facilities are located within 1500 feet of the Site.

12. The Site is presently inactive and unoccupied; some buildings on the Site have been entered and vandalized. Pursuant to an Administrative Order on Consent, Index No. II-CERCLA-80108, effective date May 2, 1988, PPG constructed security fencing to limit access to Areas A and C of the Site.

13. DDT and the other hazardous substances and contaminants which have been detected in the soil at the Site have the potential to migrate into the groundwater system in the area.

14. Surface runoff from the Site drains, in part, into a small creek which exits the Site near the northwestern boundary of the Site; surveys completed by EPA have revealed the presence of alpha-BHC and lindane in this waterway; this creek flows into Pennsauken Creek and ultimately into the Delaware Estuary.

15. Many of the substances referred to in the preceding paragraphs, including, but not limited to, DDT, DDD, DDE, lindane, malathion, dieldrin, and aldrin are hazardous substances within the meaning of Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

16. Studies have shown that many of the substances referred to in the preceding paragraphs can cause a variety of adverse, acute and/or chronic effects in exposed population groups. For example, DDT and its metabolites (DDD and DDE) are carcinogens in animals and are suspected of causing cancer in humans also. DDT and its related compounds are extremely persistent and stable in the environment.

17. The observed releases of hazardous substances onto the soil at the Site (as noted above) and into the creek which drains the Site (as noted above) and their potential to migrate into the air, soil, groundwater or surface waters constitute a release or threatened release within the meaning of that term as defined in Section 101(22) of CERCLA, 42 U.S.C. §9601(22).

18. PPG is a potentially responsible party within the meaning and the intent of Section 107(a) of CERCLA, 42 U.S.C. §9607(a).

19. The Pulverizing Services site is a "facility" within the meaning of that term as defined in Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

20. PPG has prepared, and EPA has approved, a Scope of Work (SOW) for the Phase I Study Area. The SOW is attached hereto as Appendix I.

DETERMINATION

21. Based upon the FINDINGS set forth above and the entire administrative record, EPA has determined that the release(s) and threatened release(s) of hazardous substances into the environment from the Site may present an imminent and substantial endangerment to the public health, welfare, and the environment within the meaning of Section 106(a) of CERCLA, 42 U.S.C. §9606(a).

22. A response action of the type contemplated by the National Contingency Plan, 40 C.F.R. §300.65, is required at the Site to prevent and/or mitigate any potential threat of harm to human health and/or the environment caused by the release(s) of hazardous substances from the Site.

ORDER

23. Based on the foregoing FINDINGS and DETERMINATION, it is hereby ordered and agreed that PPG Industries, Inc. undertake response actions at the Pulverizing Services site in accord with all of the terms and provisions stated below.

24. Within ten (10) calendar days after the effective date of this Order, PPG shall select a person, to be known as the Facility Coordinator, and will submit his name, address, and telephone number to the EPA On-scene Coordinator (OSC) identified below. The Facility Coordinator shall be responsible for oversight of all onsite activities required by this Order.

25. Within forty-five (45) calendar days after the effective date of this Order, PPG shall designate a Contractor for the preparation of the Phase I Site Operations Plan.

26. Within seventy-five (75) calendar days after the effective date of this Order, PPG shall submit a Draft Phase I Site Operations Plan (SOP) for the Phase I Study Area

400006

to EPA for approval; this Draft Phase I SOP shall be consistent with the Phase I Study Area - Scope of Work (SOW), attached as Appendix I to this Order, and shall include, at a minimum, those requirements as set forth in Paragraph 30 of this Order.

27. EPA will review the Draft Phase I SOP submitted by PPG for compliance with this Order, the National Contingency Plan and other applicable Federal and State laws and regulations and comment thereon in writing.

- a. Within fourteen (14) calendar days of receipt of EPA's comments PPG may request and shall be given an opportunity to meet with EPA to discuss the comments. EPA and PPG shall make their respective representatives available for discussions regarding the EPA comments during this period. If such a meeting is held, within fourteen (14) calendar days after such meeting, PPG shall amend the Draft Phase I SOP as required by EPA's comments or as otherwise agreed upon by EPA, and shall submit the amended Draft Phase I SOP to EPA. If no such meeting is requested, PPG shall amend the Draft Phase I SOP as required by EPA's comments, and shall submit the amended Draft Phase I SOP to EPA within fourteen (14) calendar days of receipt of EPA's comments on the Draft Phase I SOP.
- b. EPA's comments on the Draft Phase I SOP may require PPG to perform additional work as EPA finds necessary. Such work (including any necessary work plans and reports) shall be performed by PPG in conformance with a reasonable schedule approved by EPA.
- c. Subject only to the reservation of rights as set forth in Paragraph 39d, EPA shall be the final arbiter in any dispute regarding the sufficiency or acceptability of the Draft Phase I SOP and supplementary submissions prepared in accordance with subparagraph b above, and EPA may modify it unilaterally. At such time as EPA determines that the Draft Phase I SOP is acceptable, EPA will transmit to PPG a written statement to that effect, and that report will be deemed the Final Phase I SOP.

28. Within ninety (90) calendar days after PPG receives notice of EPA approval of the Phase I SOP, PPG shall submit a Draft Phase II Site Operations Plan (SOP) for the Phase II Study Area to EPA for approval. In addition to

complying with the requirements of Paragraph 30 of this Order, the Draft Phase II SOP shall include provisions, at a minimum, to achieve the following:

- a. Implementation of geophysical studies and a soil sampling program which will be adequate to define the spatial boundaries of the types and concentrations of hazardous substances which are located within the Phase II Study Area;
- b. Implementation of a groundwater monitoring program to determine the scope and nature of any groundwater contamination (considering information developed during implementation of the Phase I SOP) which may have resulted from the deposition or disposal of hazardous substances and other pollutants and contaminants onto or beyond the real property boundaries of the Study Area; this program shall include, at a minimum, the following activities:
 - i. Installation of wells in the Phase II Study Area and collection and analyses of samples at such wells to determine the presence, if any, of hazardous substances and other pollutants and contaminants in the shallow and deep aquifer(s) underlying the Phase II Study Area;
 - ii. Sampling and analysis of a limited number of public and private wells in the vicinity of the Site within the relevant radius as specified in subparagraph iv below;
 - iii. Literature search to define the hydrologic conditions which exist at and in the vicinity of the Site;
 - iv. Literature search of groundwater data which has been collected at any public wells within a one (1) mile radius of the Site, and private wells within one-quarter (1/4) mile of the Site within the last ten (10) years and review of such data to determine if any hazardous substances and pollutants or contaminants are present which may be traceable to the Site;
 - v. Identify on a map public wells within a one (1) mile radius, and define residences served by private wells within a one-quarter (1/4) mile radius; and

- vi. If onsite monitoring indicates the presence of groundwater contamination that may be migrating offsite, installation of offsite well(s) and sampling and analyses at such wells.
 - c. Implementation of an offsite sampling program (in soil, air and surface waters) which will be adequate to detect the presence of any hazardous substances which may have migrated off the Site. Sampling conducted under the offsite sampling program should also be sufficient to characterize back-ground levels of hazardous substances in the vicinity of the Site.
 - d. Implementation of a study to assess the potential for migration of hazardous substances which are detected in the soil at the Site into the underlying aquifers.
29. EPA will review the Draft Phase II SOP submitted by PPG for compliance with this Order, the National Contingency Plan and other applicable Federal and State laws and regulations and comment thereon in writing.
- a. Within fourteen (14) calendar days of receipt of EPA's comments PPG may request and shall be given an opportunity to meet with EPA to discuss the comments. EPA and PPG shall make their respective representatives available for discussions regarding the EPA comments during this period. If such a meeting is held, within fourteen (14) calendar days after such meeting, PPG shall amend the Draft Phase II SOP as required by EPA's comments or as otherwise agreed upon by EPA, and shall submit the amended Draft Phase II SOP to EPA. If no such meeting is requested, PPG shall amend the Draft Phase II SOP as required by EPA's comments, and shall submit the amended Draft Phase II SOP to EPA within fourteen (14) calendar days of receipt of EPA's comments on the Draft Phase II SOP.
 - b. EPA's comments on the Draft Phase II SOP may require PPG to perform additional work as EPA finds necessary. Such work (including any necessary work plans and reports) shall be performed by PPG in conformance with a reasonable schedule approved by EPA.
 - c. Subject only to the reservation of rights as set forth in Paragraph 39d, EPA shall be the final arbiter in any dispute regarding the sufficiency

or acceptability of the Draft Phase II SOP and supplementary submissions prepared in accordance with subparagraph b above, and EPA may modify it unilaterally. At such time as EPA determines that the Draft Phase II SOP is acceptable, EPA will transmit to PPG a written statement to that effect, and that report will be deemed the Final Phase II SOP.

30. Each of the Draft Site Operations Plans shall fully describe how the studies referred to in Paragraphs 26 and 28, shall be implemented and shall also include, at a minimum, the following:

- a. A detailed map of the Site depicting the location of all soil, geophysical and groundwater sampling locations;
- b. The type and number of samples, collection methodology and the analyses to be performed at each sampling station;
- c. A Quality Assurance/Quality Control Plan for all investigations under this Order which shall comply with Section 10 of the EPA publication, Test Methods for Evaluating Solid Waste (SW-846);
- d. A Health and Safety Plan in accord with EPA regulations; and
- e. A schedule for the completion of each of the tasks noted in Paragraphs 26 and 28, which is in accord with the schedule for submission of the Phase I and Phase II Site Investigation Reports to EPA by the dates set forth in Paragraphs 32 and 36.

31. All field work required by the Phase I SOP shall be completed by PPG on or before ninety (90) calendar days after PPG receives notice of EPA approval of the Phase I SOP.

32. Upon completion of the studies required in Paragraph 26, PPG shall submit to EPA a Draft Phase I Site Investigation Report (SIR) on or before one hundred and twenty (120) calendar days after PPG receives notice of EPA approval of the Phase I SOP for the Phase I Study Area. This Draft Phase I SIR shall include, at a minimum, the following components:

- a. A listing of all contractors which performed work for PPG for the Phase I SOP; a listing of

all laboratories which analyzed the data presented in the Phase I SIR; and a description of the chain of custody procedures used by PPG and the names of all entities who handled samples collected at the Phase I Study Area for analyses;

- b. A discussion of the results of the studies performed by PPG pursuant to the Phase I SOP;
- c. The results of all soil, geophysical and groundwater studies performed by PPG pursuant to the Phase I SOP;
- d. An in-depth discussion of the scope and nature of all contamination which was discovered in the soil and groundwater at and under the Phase I Study Area;
- e. Maps on which are indicated isobars showing the soil and groundwater concentrations of each of the following hazardous substances in the Phase I Study Area: DDT, DDD, DDE, lindane, malathion, dieldrin, Sevin, PCNB and dioxin;
- f. Figure(s) which describe the vertical and horizontal distribution of DDT and other hazardous substances which have been detected at and under the Phase I Study Area;
- g. Identification of response measures which appear feasible for mitigation of the soil and groundwater contamination at or emanating from the Phase I Study Area; and
- h. Recommendation of response measure(s) which PPG deems to be the most appropriate for mitigation of the soil and groundwater contamination at or emanating from the Phase I Study Area.

33. EPA will review the Draft Phase I SIR submitted by PPG for compliance with this Order, the National Contingency Plan and other applicable Federal and State laws and regulations and comment thereon in writing.

- a. Within fourteen (14) calendar days of receipt of EPA's comments PPG may request and shall be given an opportunity to meet with EPA to discuss the comments. EPA and PPG shall make their respective representatives available for discussions regarding the EPA comments during this period. If such a meeting is held, within fourteen

(14) calendar days after such meeting, PPG shall amend the Draft Phase I SIR as required by EPA's comments or as otherwise agreed upon by EPA, and shall submit the amended Draft Phase I SIR to EPA. If no such meeting is requested, PPG shall amend the Draft Phase I SIR as required by EPA's comments, and shall submit the amended Draft Phase I SIR to EPA within fourteen (14) calendar days of receipt of EPA's comments on the Draft Phase I SIR.

- b. EPA's comments on the Draft Phase I SIR may require PPG to perform additional work as EPA finds necessary. Such work (including any necessary work plans and reports) shall be performed by PPG in conformance with a reasonable schedule approved by EPA.
- c. Subject only to the reservation of rights as set forth in Paragraph 39d, EPA shall be the final arbiter in any dispute regarding the sufficiency or acceptability of the Draft Phase I SIR and supplementary submissions prepared in accordance with subparagraph b above, and EPA may modify it unilaterally. At such time as EPA determines that the Draft Phase I SIR is acceptable, EPA will transmit to PPG a written statement to that effect, and that report will be deemed the Final Phase I SIR.

34. EPA, upon approval of the Phase I SIR, will determine the appropriate response action required for the Phase I Study Area.

35. All field work required by the Phase II SOP shall be completed by PPG on or before ninety (90) calendar days after PPG receives notice of EPA approval of the Phase II SOP.

36. Upon completion of the studies required in Paragraph 28, PPG shall submit to EPA a Draft Phase II Site Investigation Report (SIR) on or before one hundred and fifty (150) calendar days after PPG receives notice of EPA approval of the Phase II SOP for the Phase II Study Area. This Draft Phase II SIR shall include, at a minimum, the following components:

- a. A listing of all contractors which performed work for PPG for the Phase II SOP; a listing of all laboratories which analyzed the data presented in the Phase II SIR; and a description of the

chain of custody procedures used by PPG and the names of all entities who handled samples collected at the Phase II Study Area for analyses;

- b. A discussion of the results of all of the studies performed pursuant to the Phase II SOP;
- c. The results of all soil, geophysical and groundwater studies performed by PPG pursuant to the Phase II SOP;
- d. An in-depth discussion of the scope and nature of contamination discovered in the soil and groundwater at and under the Phase II Study Area;
- e. A discussion of offsite transport of all hazardous substances, if any, which were discovered by PPG;
- f. Maps on which are indicated isobars showing the soil and groundwater concentrations of each of the following hazardous substances in the Phase II Study Area: DDT, DDD, DDE, lindane, malathion, dieldrin, Sevin, PCNB and dioxin;
- g. Figure(s) which indicate the approximate boundaries of all areas of the Phase II Study Area as well as offsite locations in which the soil concentrations of DDT and other hazardous substances are significantly higher than the apparent background levels for such substances;
- h. Identification of response measures which appear feasible for mitigation of the soil and groundwater contamination at or emanating from the Phase II Study Area; and
- i. Recommendation of response measure(s) which PPG deems to be the most appropriate for mitigation of soil and groundwater contamination at or emanating from the Phase II Study Area.

37. EPA will review the Draft Phase II SIR submitted by PPG for compliance with this Order, the National Contingency Plan and other applicable Federal and State laws and regulations and comment thereon in writing.

- a. Within fourteen (14) calendar days of receipt of EPA's comments PPG may request and shall be given an opportunity to meet with EPA to discuss the comments. EPA and PPG shall make their respective representatives available for discussions

regarding the EPA comments during this period. If such a meeting is held, within fourteen (14) calendar days after such meeting, PPG shall amend the Draft Phase II SIR as required by EPA's comments or as otherwise agreed upon by EPA, and shall submit the amended Draft Phase II SIR to EPA. If no such meeting is requested, PPG shall amend the Draft Phase II SIR as required by EPA's comments, and shall submit the amended Draft Phase II SIR to EPA within fourteen (14) calendar days of receipt of EPA's comments on the Draft Phase II SIR.

- b. EPA's comments on the Draft Phase II SIR may require PPG to perform additional work as EPA finds necessary. Such work (including any necessary work plans and reports) shall be performed by PPG in conformance with a reasonable schedule approved by EPA.
- c. Subject only to the reservation of rights as set forth in Paragraph 39d, EPA shall be the final arbiter in any dispute regarding the sufficiency or acceptability of the Draft Phase II SIR and supplementary submissions prepared in accordance with subparagraph b above, and EPA may modify it unilaterally. At such time as EPA determines that the Draft Phase II SIR is acceptable, EPA will transmit to PPG a written statement to that effect, and that report will be deemed the Final Phase II SIR.

38. EPA, upon approval of the Phase II SIR, will determine the appropriate response action required for the Phase II Study Area.

39. PPG and EPA shall make reasonable efforts to informally and in good faith resolve all disputes or differences of opinion which arise with respect to the implementation of this Order.

- a. Paragraphs 27a, 29a, 33a and 37a provide PPG with the opportunity to discuss EPA's comments concerning the Draft Phase I SOP, Draft Phase II SOP, Draft Phase I SIR, and Draft Phase II SIR.
- b. If PPG, in good faith, disagrees in whole or in part, with comments made by EPA pursuant to Paragraphs 27b, 29b, 33b, and 37b, PPG shall notify EPA in writing of its objection as soon as

possible, but not later than fourteen (14) calendar days after receipt of such comments by EPA. If PPG so notifies EPA within the aforesaid period, the Associate Director for Enforcement Programs - EPA Region II, shall provide a written response to PPG setting forth EPA's position and the basis for that position. The written response of the Associate Director for Enforcement Programs - EPA Region II shall constitute the resolution of the dispute and shall be deemed to be incorporated in this Order.

- c. If a dispute and its resolution, as described in subparagraph b above, cause a delay that makes it impossible for PPG to meet a deadline set forth in or established pursuant to this Order, then that deadline shall be extended by a period of time not to exceed the delay resulting from the dispute and its resolution; PROVIDED, that PPG shall not be entitled to any such extension if the Associate Director for Enforcement Programs - EPA Region II determines that PPG's disagreement with the comments specified above is not in good faith or otherwise lacks a reasonable basis. Notwithstanding any of the foregoing, if PPG requests an extension of a deadline set forth in or established pursuant to this Order, and if EPA declines to grant an extension in response to such a request, any delay, caused solely by the resolution of such a dispute shall not entitle PPG to an extension of time.
- d. Notwithstanding any of the foregoing, EPA will be the final arbiter of all disputes under this Order and the final arbiter as to the sufficiency and acceptability of all work conducted pursuant to this Order. However, nothing in this Paragraph shall affect any rights that PPG may have to judicial review of EPA's actions or determinations under this Order, and, except as provided in Paragraph 71, EPA and PPG expressly reserve all rights and defenses that they may have pursuant to applicable law.

40. PPG shall comply with all applicable provisions of the National Contingency Plan, and all other applicable Federal and State statutes and regulations while performing all of the work required by this Order.

41. PPG shall comply with all applicable Federal and State health and safety requirements for all workers and agents of PPG who enter the Site, including all applicable regulations of the Occupational Safety and Health Administration (OSHA), as contained in 29 C.F.R. §1910 et seq. and elsewhere.

extent that access agreement(s) obtained by PPG allows such access onto any and all areas of the Site. Consistent with its access rights PPG shall permit such EPA agents to enter and move about the Site at will at all times and shall allow such officials or agents of EPA to undertake any observations, response actions or any other activities which EPA elects to undertake at the Site at EPA's option.

48. PPG will use all reasonable efforts to obtain all access agreements which are needed to implement the terms of this Order. If, after such efforts, PPG cannot obtain any particular access agreement which is required for implementation of the terms of this Order, PPG shall so notify the EPA Project Manager in writing and shall specify the real property in question and the efforts which PPG has taken to obtain entry onto the property in question. If EPA determines that access onto the parcel in question is needed to implement any of the terms of this Order, EPA will make reasonable efforts to facilitate access by PPG to that parcel of land. However, PPG shall continue to implement all other terms of this Order which, in the view of EPA, can still be implemented regardless of the failure to obtain access to the parcel of land in question.

49. All SOPs, SIRs and other writings required under the terms of this Order shall, upon approval by EPA, be deemed incorporated into and become a part of this Order.

50. No informal advice, guidance, suggestions or comments by EPA or DEP shall be construed to relieve PPG of any of its obligations under this Order.

51. All contractors and subcontractors PPG plans to use for work at the Site must have adequate liability coverage or indemnification for any liability which may result from any activities conducted onsite pursuant to this Order. Prior to commencement of onsite activities by PPG contractors and subcontractors PPG shall require that their contractors and subcontractors provide to PPG such documents or other materials which indicate that the contractors and subcontractors have in effect, at the time of commencement of onsite activities and maintain in effect for the expected duration of onsite activities, liability coverage or indemnification as required in this Paragraph.

52. PPG may request in writing that EPA approve modification(s) to the EPA approved Phase I or Phase II SOPs or Phase I or Phase II SIRs at any time during the implementation of the work required by this Order. Any and all such modifications to this Order must be approved in a writing signed by the Associate Director for Enforcement Programs - EPA Region II.

- a. EPA shall have sole authority to make any modification(s) to the EPA approved Phase I or Phase II

SOPs or Phase I or Phase II SIRs and EPA may unilaterally make any such modification(s) to the Phase I or Phase II SOPs or Phase I or Phase II SIRs. PPG reserves the right, however, to comment on or disagree with any modification(s) made by EPA to the Phase I or Phase II SOPs or Phase I or Phase II SIRs. Any such comments from PPG on EPA modification(s) to the Phase I or Phase II SOPs or Phase I or Phase II SIRs shall be set forth in either a footnote or an appendix to the modified Phase I or Phase II SOPs or Phase I or Phase II SIRs.

- b. Subject only to the reservation of rights in Paragraph 39d, EPA alone shall be the final arbiter of any issues or disputes concerning modification to the Phase I or Phase II SOPs or Phase I or Phase II SIRs and all work which shall be required under this Order.

53. PPG shall provide monthly written progress reports to EPA. At a minimum, these progress reports shall: (1) describe all action and activities undertaken toward achieving compliance with this Order, and (2) include all plans and procedures completed subsequent to EPA approval of the Phase I SOP during the preceding month as well as such action and plans which are scheduled for the next month. Three (3) copies of the monthly report shall be submitted to the EPA Region II Project Officer by the fifteenth (15) calendar day of each month following the effective date this Order.

54. All work conducted pursuant to this Order shall be performed in accordance with prevailing professional standards.

55. PPG shall be responsible for obtaining all necessary permits, licenses and other authorizations needed to carry out the work required by this Order.

56. The United States Government and any and all agencies thereof shall not be liable for any injuries or damages to any person or property resulting from any acts or omissions of PPG's officers, directors, employees, contractors, or agents when carrying out any activity related to this Order; PPG shall not represent to anyone that the United States Government or any agency thereof is or may be a party to any contract entered into by PPG in carrying out any activity pursuant to this Order.

57. PPG shall use its best efforts to avoid or minimize any delay or prevention of performance of its obligations under this Order.

- a. PPG shall perform all the work required by this Order within the time limits set forth herein unless performance is delayed by events which constitute a

force majeure. For the purposes of this Order, a force majeure is defined as any event arising from causes beyond PPG's control. Increased costs or changed financial circumstances shall not constitute a force majeure.

- b. PPG shall orally notify EPA as soon as possible after PPG becomes aware of any circumstances which have occurred or which are likely to occur which would constitute a force majeure. PPG will notify the EPA Project Officer in writing no later than seven (7) calendar days after PPG became aware of or, based upon a reasonable man standard, should have become aware of the event(s) which would or could constitute a force majeure under this Paragraph. Such notification to EPA shall not relieve PPG of any of its obligations under this Order.
- c. In its notice letter to EPA, PPG shall fully describe the nature of the delay, the actions which will be taken to mitigate the delay and the timetable within such actions to mitigate any further delay will be taken.
- d. PPG shall have the burden of proving that any requirement of this Order is excused by this force majeure provision.

58. PPG agrees to reimburse EPA for all oversight costs which are incurred by EPA and all of its agents, contractors and employees relating to this Order.

- a. PPG understands that EPA personnel, and/or EPA contractors, subcontractors or designated representatives shall be present at the Site to oversee field work performed pursuant to this Order and that costs incurred as a result of their activities related to this Order will be reimbursed by PPG upon a demand in writing by EPA to PPG.
- b. Any demand in writing from EPA to PPG for reimbursement of costs incurred by EPA relating to this Order will be accompanied by documentation from EPA accounting for all such costs incurred by EPA, its agents, contractors and/or employees.
- c. PPG will reimburse EPA for all oversight costs incurred by EPA relating to this Order within sixty (60) calendar days after the date the letter from EPA to PPG which demands that PPG pay such costs is received by PPG.

- d. All payments by PPG to EPA pursuant to the terms of this Order shall be in the form of a cashier's check or a certified check made out in the amount demanded by EPA and made payable to "Hazardous Substances Superfund"; all such checks shall be mailed to the following address within the time stipulated in subparagraph c above:

EPA - Region II
Attn: Superfund Accounting
P.O. Box 360188M
Pittsburgh, PA 15251

All such payments shall be accompanied by a letter stating the name and address of PPG Industries, Inc., the name of the Site, and the number on this Order. A copy of the letter and check must also be sent to the EPA Region II Project Officer at the address noted in Paragraph 43.

59. Any failure by PPG to carry out any terms of this Order may result in EPA unilaterally taking the actions required under this Order, pursuant to Section 104(a) of CERCLA, 42 U.S.C. §9604(a).

60. Any failure by PPG to comply with any provision in this Order, including, but not limited to, any failure to comply with any terms of the EPA approved Phase I or Phase II SOPs or EPA approved Phase I or Phase II SIRs which are to be prepared pursuant to this Order, will be considered a violation of this Order. In such an event, EPA may elect to:

- a. Demand that PPG cease work under the Order;
- b. Use federal funds to complete the work required by the Order; and/or
- c. Take any other action(s) authorized under Federal law(s) or regulation(s).

61. Nothing stated in this Order shall preclude EPA from taking any additional enforcement actions, and/or any actions as it may deem necessary for any purpose, including the prevention or abatement of an imminent and substantial endangerment to the public health or welfare or the environment arising from conditions at the Site.

62. If PPG fails to comply with any of the requirements or time limits associated with:

- a. Completion of the Phase I SOP within seventy-five (75) calendar days after the effective date of this Order;

- b. Completion of the Phase I SIR within one hundred and twenty (120) calendar days after PPG receives notice of EPA approval of the Phase I SOP;
- c. Completion of the Phase II SOP within ninety (90) calendar days after PPG receives notice of EPA approval of the Phase I SOP; and
- d. Completion of the Phase II SIR within one hundred and fifty (150) calendar days after EPA approval of the Phase II SOP.

And, unless such failure was caused by a force majeure event as defined above or by an extension of time granted by EPA, PPG shall be subject to a stipulated penalty to EPA in the amount(s) indicated below for each and every calendar day of noncompliance:

<u>Days After Required Date</u>	<u>Daily Stipulated Penalty</u>
1 to 10 days	\$500/day
11 days or more	\$1000/day

Any such penalty shall accrue as of the first calendar day after the applicable deadline has passed and shall continue to accrue until the noncompliance is corrected. Such penalties shall be due and payable ten (10) calendar days after the date that PPG receives a written demand from EPA for such penalties. Payment of any such penalties to EPA shall be made payable to the "Hazardous Substance Superfund" in the same manner as stated in Paragraph 58d.

63. Nothing contained in this Order shall affect the right of EPA to pursue an action for civil penalties against any entity pursuant to Section 106(b) of CERCLA, 42 U.S.C. §9606(b), or the right of PPG to defend any such action brought against it.

64. Nothing contained in this Order shall affect the right of EPA to pursue an action against PPG, except for those costs which have been paid by PPG to EPA pursuant to Paragraph 58, or any other responsible party pursuant to Section 107 of CERCLA, 42 U.S.C. §9607, for recovery of any costs incurred by EPA relating to this Order and/or for any other response costs which have been incurred or will be incurred by the United States relating to this Site.

65. Nothing in this Order shall affect the right of EPA to enter any other Administrative Order on Consent and/or issue any other Order unilaterally to PPG (and/or any other responsible parties for the Site) pursuant to CERCLA to require the performance of any additional response actions which EPA determines are necessary for this Site.

66. Nothing herein shall act as a bar to, a release of, a satisfaction of or a waiver of any claim or cause of action which EPA has at present or which EPA may have in the future against any entity, including PPG, on any matters relating to this Site.

67. Nothing herein is intended to mean that PPG is the only potentially responsible party with respect to the release or threatened release of hazardous substances at the Site.

68. Nothing contained in this Order shall affect any right, claim, interest, defense, or cause of action of EPA or PPG with respect to any entity which is not a party to this Order. Nothing in this Order constitutes a decision on pre-authorization or approval of funds under Section 111(a)(2) of CERCLA, 42 U.S.C. §9611(a)(2).

69. PPG agrees not to make any claim(s) pursuant to Sections 106(b)(2), 111 and/or 112 of CERCLA, 42 U.S.C. §§9606(b)(2), 9611, 9612, either directly or indirectly, for reimbursement from the Hazardous Substance Superfund for any costs incurred by PPG in complying with the terms of this Order.

70. Upon completion of the work required by this Order, the Associate Director for Enforcement Programs - Region II will notify PPG that the requirements of this Order have been satisfied. The provisions of this Order shall be deemed satisfied when PPG receives this written notice signed by the Associate Director for Enforcement Programs - Region II which states that all the actions required by this Order have been satisfactorily completed.

71. Nothing contained in this Order shall constitute an admission by PPG with respect to any factual finding or legal determination noted herein. However, PPG agrees not to contest any of the following in any proceeding in any federal court after the effective date of this Order:

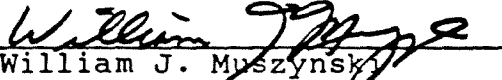
- a. the validity of this Order; and
- b. the authority of the Regional Administrator of EPA Region II to enter into this Order.

PPG reserves all legal remedies and defenses otherwise available under federal law.

72. This Order shall become effective on the third date after it is signed by the Regional Administrator of EPA

Region II as indicated below. All activities required pursuant to this Order with deadlines measured from the effective date shall be calculated from this effective date.

For: U.S. ENVIRONMENTAL PROTECTION AGENCY


William J. Muszynski
Acting Regional Administrator
U.S. Environmental Protection Agency
Region II

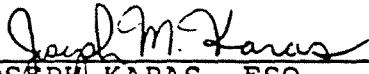
3-31-81
DATE

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CONSENT

The signatory identified below certifies that he is fully authorize to represent PPG Industries, Inc. in this matter, to agree to the terms and conditions of this Order on behalf of PPG Industries, Inc. and to bind PPG Industries, Inc. to all of the terms and conditions of this Order. The person who has signed below also represents that he has discussed this Administrative Order on Consent with officers and/or directors of PPG Industries, Inc. and that by his signature, PPG Industries, Inc. agrees to enter into this Order and to be bound by its terms.

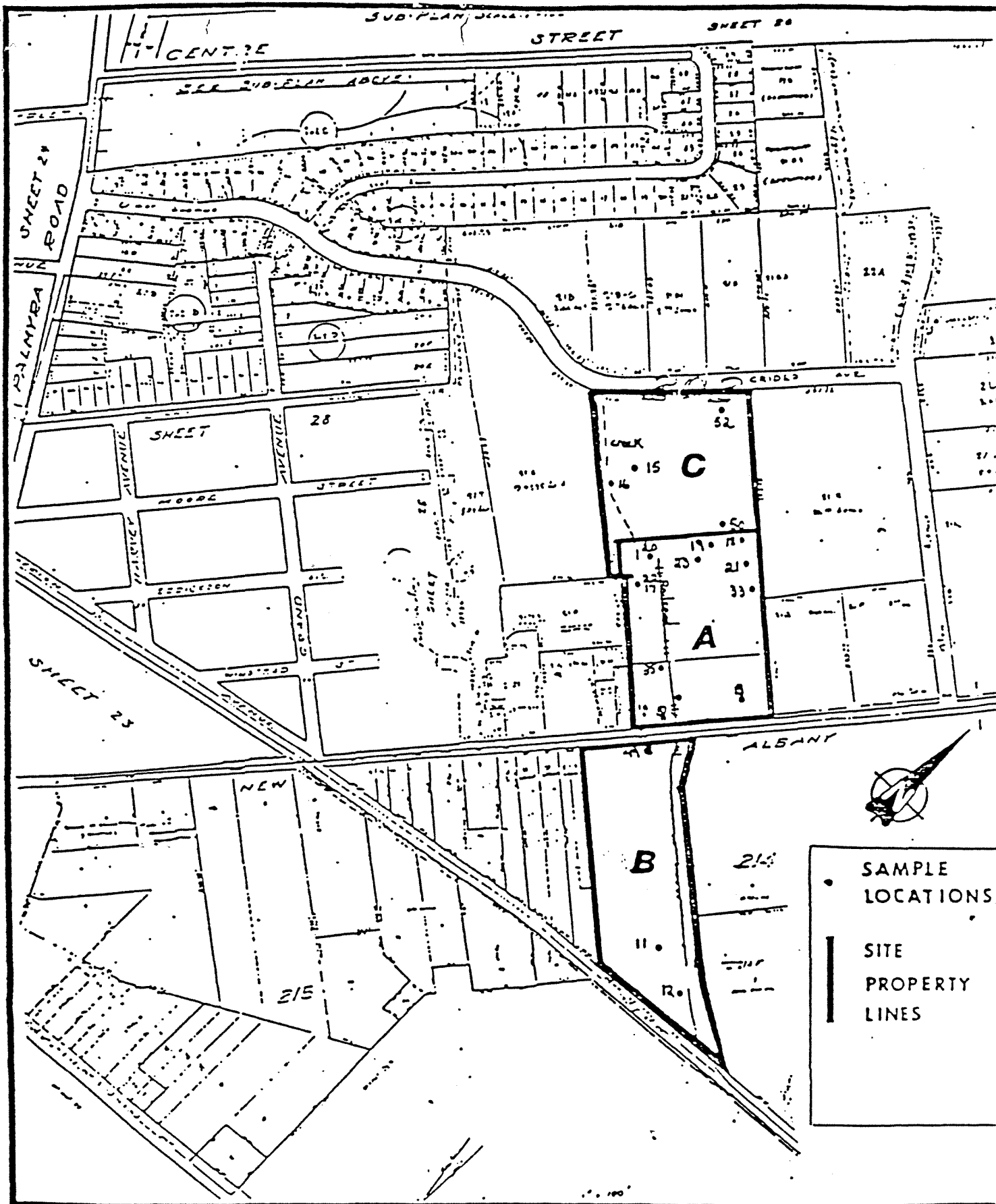
For: PPG INDUSTRIES, INC.

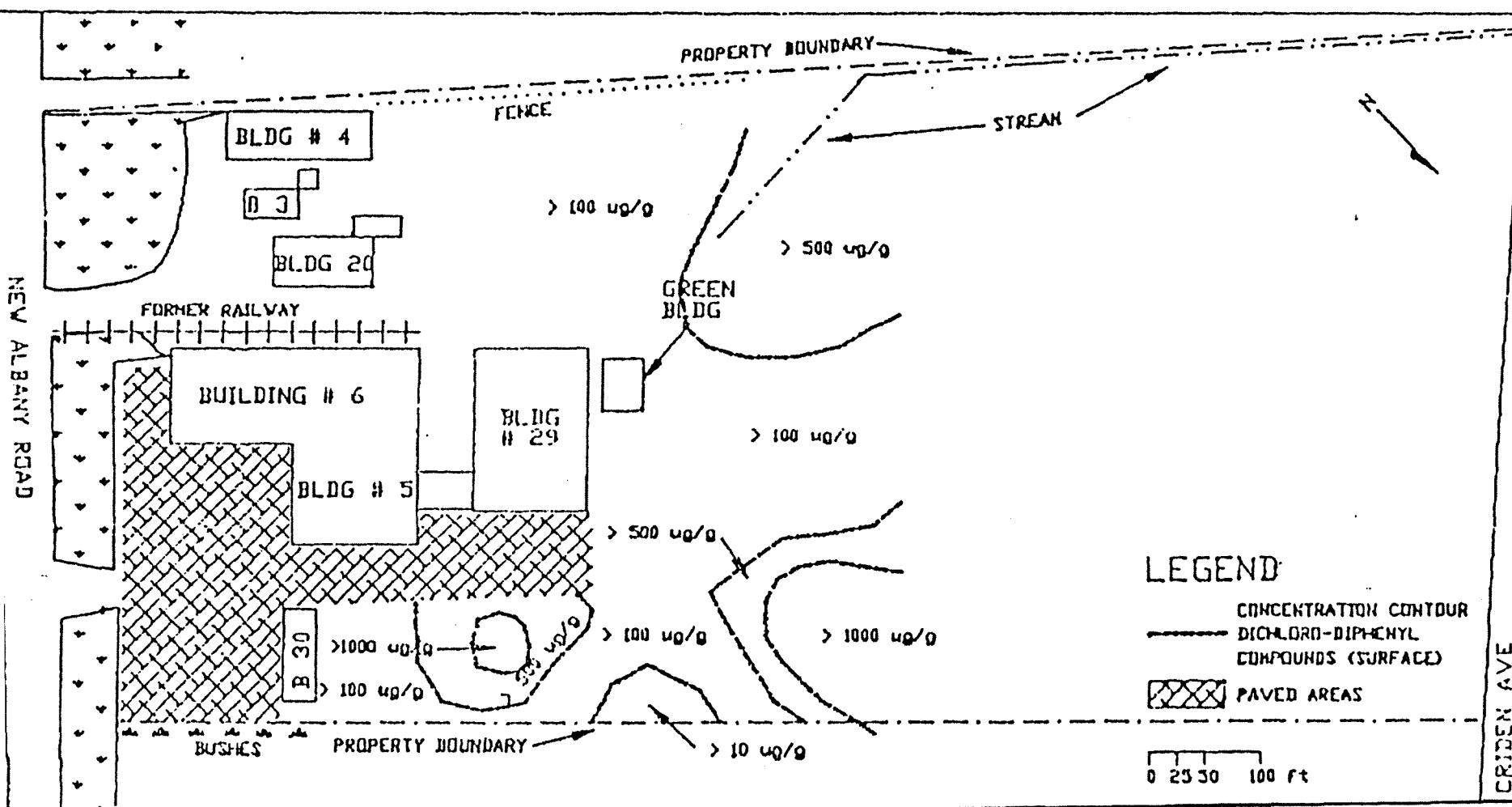


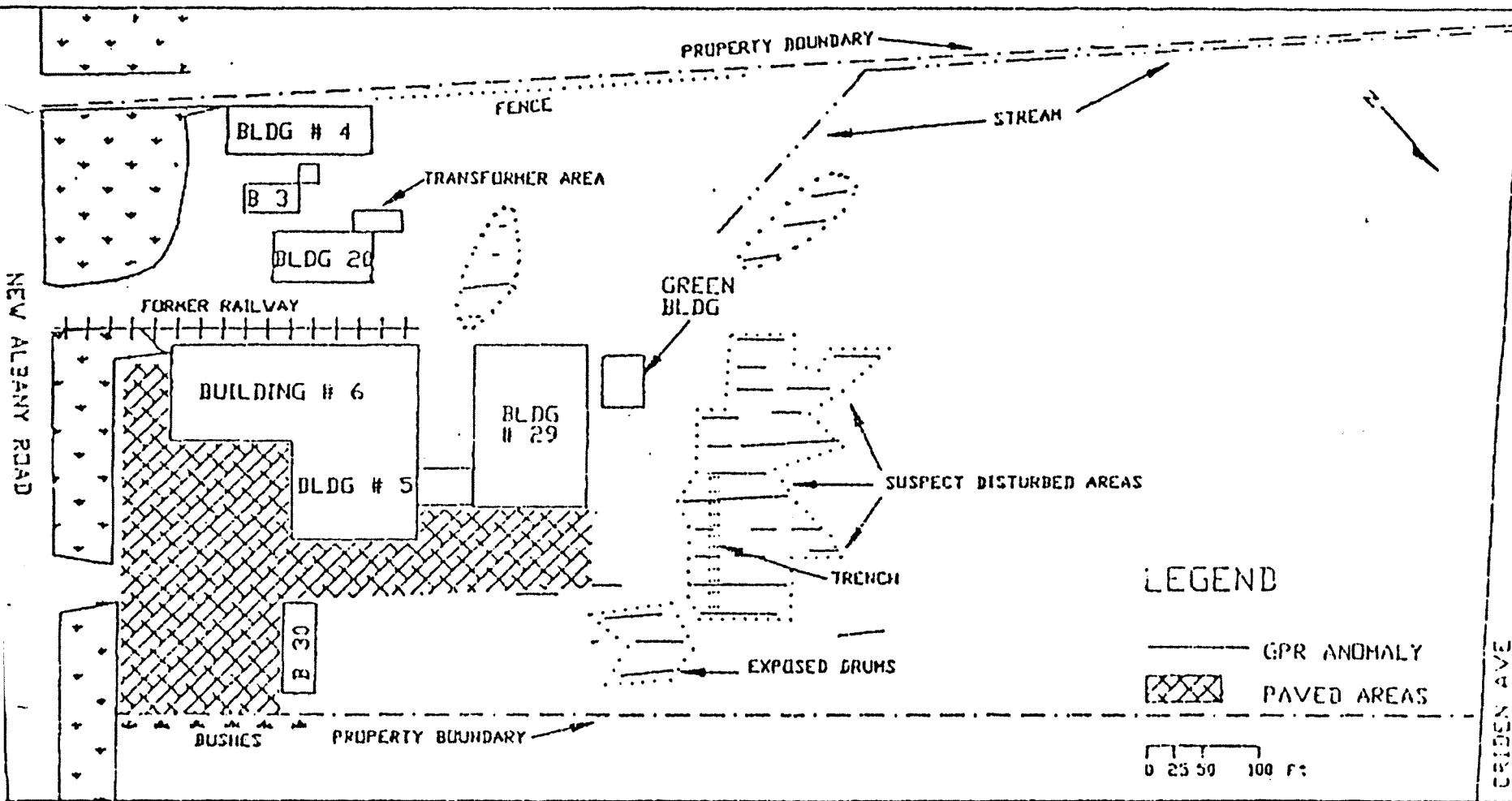
JOSEPH KARAS, ESQ.
Law Department
PPG Industries, Inc.
One PPG Place
Pittsburgh, Pennsylvania 15272

3/31/89
DATE

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CRIDEN AVE

NEW ALBANY ROAD