Five-Year Review Report

Pulverizing Services Site
Moorestown Township
Burlington County, New Jersey

Prepared by
U.S. Environmental Protection Agency
Region II
New York, New York

May 2005

139796

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Five-Year Review Summary Form

SITE IDENTIFICATION

Site name *(from WasteLAN)*: Pulverizing Services

EPA ID *(from WasteLAN)*: NJD 980582142

Region: 2 | **State:** NJ | **City/County:** Moorestown/Burlington County

SITE STATUS

NPL status: ☐ Final ☐ Deleted ■ Other (specify) Non NPL Site

Remediation status (choose all that apply): ■ Under Construction ☐ Constructed ☐ Operating

Multiple OUs?* ■ YES ☐ NO | **Construction completion date:**

Has site been put into reuse? ☐ YES ■ NO ☐ N/A

REVIEW STATUS

Lead agency: ■ EPA ☐ State ☐ Tribe ☐ Other Federal Agency

Author name: Mark Austin

Author title: Remedial Project Manager | **Author affiliation:** EPA

Review period:** 05/1/2000 to 05/1/2005

Date(s) of site inspection: March 17, 2005

Type of review:

☐ Post-SARA ☐ Pre-SARA ☐ NPL-Removal only
■ Non-NPL Remedial Action Site ☐ NPL State/Tribe-lead
☐ Policy ☐ Regional Discretion

Review number: ■ 1 (first) ☐ 2 (second) ☐ 3 (third) ☐ Other (specify) _____

Triggering action:

■ Actual RA Onsite Construction at OU1 ☐ Actual RA Start at OU1
☐ Construction Completion ☐ Previous Five-Year Review Report
Other (specify) _____

Triggering action date *(from WasteLAN)*: May 1, 2000

Does the report include recommendation(s) and follow-up action(s)? ■ yes ☐ no
Is the remedy protective of the environment? ☐ yes ☐ no ■ not yet determined

* ["OU" refers to operable unit.]
** [Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]

Five-Year Review Summary Form, cont'd.

Issues:

The remedy for the site-wide soils is being completed under the 1999 Decision Document. For remediation purposes, the site has been divided up into Areas A, B and C. Contaminated soil in Areas A and C has been excavated and site restoration performed appropriately. Area B has not yet been completely remediated. As progress of the soil removal continues, the remedy is functioning as intended by the Decision Document. Current site access in Areas A and C is secure with appropriate fencing. Area B is fenced; however, it does not completely secure the site since there are some areas where the fencing is missing or in need of repair. There has been limited investigation of the groundwater. A comprehensive groundwater investigation is planned.

Recommendations and Follow-up Actions:

The soil remedy continues to be implemented. The work is expected to be completed by the end of 2005. When the soil remediation is complete, the Potentially Responsible Parties will investigate the groundwater for site-related contamination.

Portions of Area B still to be remediated are not fully fenced. Completion of the soil remedy in this area is expected in 2005. If the completion of the soil remedy is delayed more than 12 months, EPA will re-evaluate the need for more formal access controls until the work can be completed.

Protectiveness Statement:

As of January 2005, Areas A, C and most of Area B have been completed. There are remaining cleanup activities being planned in Area B. Final soil remediation activities are anticipated to be completed by the end of 2005. The remedy for site-wide soils is expected to be protective of human health and the environment upon completion.

Other Comments:

N/A

I. Introduction

This is the first five-year review for the Pulverizing Services Superfund site, located in the Township of Moorestown, Burlington County, New Jersey. Although the site was not placed on the National Priorities List (NPL), remedial action has been taken under Section 121 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. §9601 *et seq*. and 40 CFR 300.430(f)(4)(ii). The U.S. Environmental Protection Agency (EPA), Region 2, conducted this five-year review pursuant to Section 121 (c) of CERCLA, 40 CFR 300.430(f)(4)(ii), and in accordance with the Comprehensive Five-Year Review Guidance, Office of Solid Waste and Emergency Response (OSWER) Directive 9355.7-03B-P (June 2001). The purpose of a five-year review is to assure that implemented remedies protect public health and the environment and that they function as intended by the site decision documents. This document will become part of the site file.

In accordance with Section 1.3.3 of the five-year review guidance, a statutory five-year review is triggered by the date of construction initiation. For this site, the date of remedial action on-site construction start was May 1, 2000. Remedial construction activities for site-wide soils continue and are anticipated to be completed by the end of 2005. A groundwater investigation is planned following the completion of this final site-related soil remedial action.

This five-year review, specifically addressing site-wide soils, found that the implemented remedies are functioning as intended and continue to protect human health and the environment.

The Pulverizing Services site is an EPA-lead, Potentially Responsible Party (PRP) cleanup site.

II. Site Chronology

See Appendix A, Table 1 for site-related events, from discovery to present activities.

III. Background

Physical Characteristics

The site is located on approximately 24 acres in an industrial park at 332 New Albany Road in Moorestown, Burlington County, New Jersey.

The site is bounded to the northwest by Crider Avenue, across from a manufacturing facility. Railroad tracks and several residences are located southeast of the site. Residential, commercial, and industrial properties are located southwest of the site. Northeast of the site are commercial and industrial facilities. The site is zoned as non-residential, commercial.

Site Hydrogeology

The site is located within 3/4 mile east of the North Branch Pennsauken Creek, and an unnamed creek is located approximately 3/4 mile further east of the site. Regionally, the site is located in the Atlantic Coastal Plain Physiographic Province in a transition zone between the Englishtown Formation and the Woodbury Clay. The site-specific unconsolidated sediments of the Coastal Plain include the Magothy and Raritan Formation, Merchantville Formation and the Woodbury Clay, which are all Crestaceous Age. Beneath the site, bedrock is estimated to be 450 feet below ground surface. Site hydrogeology is primarily controlled by the presence of the surface unit consisting of red sand and gravel with silt and clay-rich zones, stiff, low permeable clays, and the deep sands and gravels beneath the clay. These factors affect the site hydro geology which results in the following: an upper shallow unconfined water table aquifer approximately 10 to 20 feet thick; a confining layer consisting of approximately 125 feet of an extremely low-permeability clay, followed by 10 feet of sand and another 100 feet of very stiff clay; and a deeper (at around 225 feet below ground surface) artesian groundwater unit consisting of sands and gravels with no apparent hydrologic connection with the overlying unconfined unit.

Groundwater flow in the shallow aquifer is generally west towards the North Branch of the Pennsauken Creek.

Land and Resource Use

Land use immediately adjacent to the site is comprised of the following commercial, light industrial, and residential areas:

- North: Crider Avenue and a manufacturing facility
- South: railroad tracks owned by New Jersey Transit and several residences
- East: active industrial facilities
- West: residential, commercial, and industrial properties

The entire site is subdivided into three parcels (Areas A, B, and C), with New Albany Road separating Area B from Areas A and C. The site layout map (Appendix B, Figure 1) presents the locations

of Areas A, B, and C and site conditions prior to initiating soil removal activities.

Potable water in the area is supplied by a municipal water system. Site investigations included a well survey that identified several inactive wells in the area. Wells in the area were screened in the deeper unconfined unit aquifer, whereas groundwater contamination attributable to the site was found in the shallower unconfined unit or water table aquifer, as discussed in more detail, below.

History of Contamination

Historically, the site was a pesticide formulating facility. A summary of site ownership is presented below:

- 1935 to 1946 - The plant was operated by the International Pulverizing Company
- 1946 to 1948 - The plant was owned and operated by Micronizer Company, a subsidiary of Freeport Sulfur Company
- 1948 to 1963 - The plant was owned and operated by PPG Industries, Inc.
- 1963 to 1979 - The plant was owned and operated by Pulverizing Services, Inc., until plant operations ceased in 1979
- 1979 to Present - The plant remains inactive and unoccupied

The main pesticide formulating operations were primarily located within Area A and involved the grinding, micronizing, and blending of pesticides. According to historical reports, operations were initially limited to formulation of inorganic pesticides such as lead arsenate, calcium arsenate, sulfur, and tetrasodium pyrophosphate. In later years, synthetic organic pesticides such as dichlorodiphenyltrichloroethylene (DDT), aldrin, malathion, dieldrin, lindane, rotenone, and n-methyl carbamate (Sevin or Carbaryl) were reportedly formulated. The active pesticide ingredients were not manufactured at the site, but were imported to the site then ground, blended, and packaged for distribution under various labels.

Records of Pulverizing Services, Inc., indicated that since 1935, only dry chemical processing was conducted at the site.

During the 1950s and early 1960s, waste material was reportedly disposed of in several trenches north of the main production buildings. Historical files indicate that ash and debris from a 1964 fire was placed in a trench north of the main buildings in Area A.

In 1979, operations at the plant ceased. In 1983, the former plant production facilities within Area A were decommissioned and boarded shut. The building structures remained at the site.

Initial Responses

On June 12, 1985, in response to allegations of improper waste disposal, the New Jersey Department of Environmental Protection (NJDEP) performed a site inspection. The inspection revealed that waste material (drummed and loose) remained on site, in and around the buildings, and also appeared to be buried at the north end of Area A. In April 1986, NJDEP sampled Area A and determined that the trench area was contaminated with pesticides (DDT and its decomposition products, DDD and DDE).

In October 1987, after NJDEP requested EPA to take the lead for the site, EPA conducted an investigation at the site. Samples were collected from soil, sediment, surface water, former plant structures and air. The investigation confirmed the findings of the previous NJDEP investigation and further determined that the contamination was not limited to the trench areas, but could also be found in Areas B and C. In December 1987, the EPA Environmental Response Team conducted an additional investigation at the site. A ground penetrating radar survey was used to identify several subsurface anomalies in Area A. Samples were taken of surface and subsurface soils within Areas A, B, and C. After voluntarily entering into an Administrative Order on Consent (AOC) with EPA in May 1988, PPG Industries (PPG), a former owner/operator of the facility, installed security fencing around Areas A and C. These areas were chosen to be fenced since they contained the main processing area and the trench areas.

In 1989, EPA entered into negotiations with the PRPs for the site. PPG agreed to perform the necessary investigations at the site, with the remaining PRPs agreeing to perform a removal action to clean up the material in and around the production buildings. The other PRPs included companies that sent pesticides to the site for formulation, previous owner operators, and the current owner of the site.

A Phase I Site Investigation was conducted from December 1989 to January 1990, by Paul C. Rizzo Associates, Inc., under contract with PPG. During the investigation, 20 soil borings were completed, and six monitoring wells were installed within Area A. Several soil samples (both surface and subsurface) were collected from each boring. In addition, four surface soil samples were collected from Area B, and one sediment sample was collected from the drainage ditch located in the northwest portion of Area A.

Samples were analyzed for volatile organic compounds, semi-volatile organic compounds, pesticides, and herbicides.

In September 1990, building cleanup began under the direction of EPA. As part of this cleanup, approximately 600 drums and 580 cubic yards of waste materials were shipped off site. The interiors of the buildings were then power-washed and secured.

The Phase I Site Investigation Report was finalized in April 1993. In addition, the discovery of contaminated soil in Area B prompted PPG to install security fencing around Area B in the Spring of 1993.

A Phase II Site Investigation was performed between October 1994 and May 1995. Results of the previous EPA and NJDEP sampling events and the Phase I Site Investigation were utilized to support Phase II sampling efforts. The goal of Phase II was to further characterize the nature and extent of contamination on and in the immediate vicinity of the site, gather data to support the development of Preliminary Remediation Goals (cleanup goals) and provide the necessary data to prepare the Response Measures Evaluation Report (RME). The RME identified viable cleanup technologies for the contaminants of concern and evaluated the most appropriate soil cleanup alternative for the site. The Phase II Site Investigation Report and the RME were finalized in November 1995 and December 1997, respectively.

As part of both Phase I and II investigations, groundwater contamination was detected in several monitoring wells. The shallow unconfined groundwater aquifer appears to be the only groundwater aquifer that contains site-related chemicals of concern. These site-related compounds are primarily pesticide-related such as dieldrin and benzene hexachloride (BHC) compounds (insecticides and rodenticides). The probable source seems to be the former disposal trench area located in Area A. Sample analysis of the deep confined aquifer indicates the site-related contamination has not migrated to this unit. However, the extent of groundwater contamination has not been fully characterized at the site. EPA elected to complete the groundwater site investigation after completing the soil remedy.

In the Spring and Fall of 1996, two remedial actions were performed to remove contaminated surface soils from two adjacent properties previously identified during the Phase II investigation. Soils were removed and staged on site in Building 29 for eventual disposal.

In December 1998, a third removal action was performed. This action resulted in the removal of approximately 3,460 cubic yards

of contaminated surface soil from an adjacent property, which were also staged on site in Building 29.

IV. Remedial Actions

Remedy Selection for Site-wide Soils

On July 23, 1999, EPA issued a Decision Document addressing all site-wide soils for the site. Response measure objectives, specific goals to protect human health and the environment, were based on available information, applicable or relevant and appropriate requirements (ARARs), and risk-based levels established in the RME report. The following response measure objectives were established:

- Mitigate potential routes of human health and environmental exposure to contaminated soils;
- Restore the soil to levels that would allow for commercial reuse of the property;
- Treat and/or dispose of soils excavated from off-site properties, and stockpiled in Building 29;
- Remediate all on site soils above the Site Worker Cleanup Goals provided by the Risk Assessment;
- Treat soils above 1,000 milligrams per kilogram (1,000 mg/kg) total chlorinated pesticides; and,
- Comply with ARARs, or provide grounds for invoking a waiver.

The selected response measure is expected to be the final action for addressing the soil contamination at the site. Components of the selected response measure include:

- Contaminants of Concern (COCs) were identified to be specific pesticides known as aldrin, dieldrin, and DDT;
- Excavation and off-site disposal of contaminated soils determined to be above 0.34 mg/kg of aldrin, 0.36 mg/kg of dieldrin, or 17.0 mg/kg of 4,4’-DDT (referred to as the clean up criteria);
- Off-site disposal of contaminated soils from removal activities conducted at three off-site properties, which were staged in Building No. 29;
- Testing and appropriate off-site disposal of contaminated material (including the concrete lining) found in the Building No. 5 trench;
- Excavation and off-site disposal of contaminated soils from an adjacent off-site property determined to be above non-residential standards for site-related soil contamination;

- Sampling of soil on an adjacent off-site property to determine if soil contamination exceeded non-residential standards;
- Disposal of the excavated soils that are below the treatment level of 1,000 mg/kg chlorinated pesticides, and are not Resource Conservation and Recovery Act (RCRA) characteristic hazardous waste, at an appropriate off-site disposal facility;
- Treatment by off-site thermal desorption of contaminated soil above the 1,000 mg/kg treatment level that is determined to be treatable by thermal desorption. Any remaining contaminated soil above the treatment level that cannot be treated by thermal desorption, and any soils that are determined to be RCRA hazardous waste, shall be sent to an off-site permitted incinerator for treatment; and,
- Backfilling of excavated areas with certified clean fill from an off-site location and/or on-site soils which have been treated under the requirements of the Decision Document, covered with topsoil, and vegetated.
- Since the remedy allows for future commercial use of the site, the use of institutional controls, such as a deed notice, is to be contemplated, to ensure that future land use remains commercial.

Soil Remediation

As previously stated, the site is subdivided into Areas A, B, and C. Each area is further comprised of several individual areas of concern. The original limits of planned soil excavation included an estimated soil excavation quantity of approximately 11,000 cubic yards, including both on-site and off-site removal areas. These original volume estimates were derived from limited sampling results compiled from earlier study phases. However, from the Spring of 2000 to late Fall of 2004, the limits of excavation of the each individual removal area expanded laterally and/or vertically based on field screening sample results, confirmation sampling results, and/or visual observation of soil contamination. Additionally, areas not originally identified in the approved work plan were also encountered, where the soil concentrations of one or more of the COCs exceeded applicable cleanup criteria. As a result of the expansion of the originally identified individual removal areas of the site, and the discovery of additional contaminated areas, the final limits of excavation (lateral) of the site removal areas merged into one large area. The approximate limits of excavation of on-site and off-site areas are presented on Figure 2, Appendix B.

Approximately 99,128 cubic yards of soil has been excavated to date. As of January 2005, Areas A and C have been completed. Most of Area B has also been completed, with the exception of an area in the southeastern-most portion of the property, nearest the rail road right-of- way. PPG is currently preparing a delineation report that will characterize the remaining areas of contamination in Area B and, after EPA approval, the remaining soil cleanup will be performed. Final soil remediation activities are expected to be completed by the end of 2005.

Groundwater Investigations

The EPA will start an investigation for site-wide groundwater when the soils remediation program is completed. Earlier groundwater sampling performed as part of the Phase I and II investigations found groundwater contamination in the shallow aquifer attributable to the site. Contaminants detected in the groundwater included dieldrin and BHC compounds.

V. Five-Year Review

Administrative Components

The five-year review team consisted of Mark Austin - EPA Remedial Project Manager, Charles Nace - EPA Risk Assessor, Robert Alvey - EPA Hydrogeologist, Michael Clemetson - EPA Biological Technical Assistance Group, Tom Ebbert - PPG Inc., and Jeff Pytlak - Cummings-Riter on behalf of PPG. This is an EPA-lead site and the responsibilities for PRP oversight lie with EPA.

Community Notification and Involvement

There has been low to moderate public interest in the site soil remediation activities over the past five years. Township representatives attend the majority of monthly meetings to remain apprised of the progress and to provide town-related issues or public inquiries to EPA and the PRPs. A notice was published in the Burlington County Times on April 7, 2005, informing the community of the five year review. No comments or inquiries have been received.

Document and Data Review

The site-related documents and field data, which were reviewed in completing this five-year review, are summarized in Appendix A, Table 2. Based on this information, the selected response measure has resulted in improved site conditions and supports the

conclusion that the remedy, once completed, will be protective of human health and the environment.

Site Inspection

A site visit related to this five-year review was conducted on March 17, 2005. EPA representatives were accompanied by the PRP representatives. During the site inspection, the EPA did not observe any problems or deviations from the on-going activities being implemented at the site.

VI. Remedy Assessment

Question A: Is the remedy functioning as intended by the decision document?

As progress of the soil removal nears completion, the remedy is functioning as intended by the decision document. The remedy for the site-wide soils consists of excavation and off-site transportation of contaminated soil. This work is being completed under the authority of the 1999 Decision Document. The contaminated soil in Areas A and C has been excavated and removed from the site, and restoration in these areas has been performed appropriately. Contaminated soil has been removed from most of Area B, with only the southeastern-most portion of Area B remaining. A soil delineation of Area B is currently underway, which will include off-site properties that were subjected to surface runoff from the site proper.

There has been limited investigation of the groundwater and there has been no decision on a remedy for groundwater. With regard to engineering controls, current site access in Areas A and C is secure with appropriate fencing. Area B also has fencing but it does not completely secure the area, since there are a few locations where the fencing is missing or in need of repair. Since the remaining remediation activities will affect the area where fencing is currently missing, EPA will evaluate the need for fencing after all soil removal work is complete.

With regard to institutional controls, the 1999 Decision Document contemplated a deed restriction or other form of institutional control to assure that the future land use remains commercial. It is expected that the New Jersey Department of Environmental Protection would require a deed notice for any soils remaining on the site that exceed the New Jersey Non-Residential Direct Contact Cleanup Criteria. New Jersey’s deed notice would provide for land-use controls that would prevent direct contact with residual soil contamination, and would satisfy EPA’s requirements

for institutional controls on the site. The extent of soils that will require a deed notice will not be fully known until the completion of the soil cleanup work. Therefore, the PRPs will need to retain control of the site, and no new reuse plans are expected in the short-term until land use controls are evaluated and put in place.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

(a) The selection of contaminants of potential concern and the exposure assumptions used to estimate the potential risks and hazards at the site followed acceptable Agency guidance at the time the assessments were conducted. Although using current guidance might result in some differences in selection of contaminants of potential concern, an assessment using current guidance would still recommend the need for a remedy on the basis of a similar list of contaminants and, therefore, the results of the risk assessments are still valid. (b) The toxicity data that was used in the risk assessments were valid at the time the assessments were conducted and the use of these data indicated that a remedy was needed for the site. Since then, some of the toxicity values may have been changed, with the general trend resulting in toxicity values becoming more stringent. For this site, the three compounds that were identified as contaminants of concern (COCs), aldrin, dieldrin, and 4,4'-DDT, the toxicity values have not changed since the completion of the 1999 Decision Document. The result of the changes in toxicity values for other compounds that were detected on the site would have a net effect of increasing the estimated potential risks and hazards, which would also support the decision that a remedy was needed for the site. Thus, even though toxicity values have changed, the resulting remedies that were supported by the older toxicity values are still valid, especially given that other contaminants were co-located with the COCs, and the soil was excavated (or is to be excavated) and disposed off site. (c) The cleanup levels chosen for the soil remedy were listed as 0.34 mg/kg for aldrin, 0.36 mg/kg for dieldrin, and 17 mg/kg for 4,4'-DDT. These values are risk-based concentrations that were developed for a commercial/industrial scenario and correspond to a carcinogenic risk level of 1×10^{-6} (i.e., one excess cancer in a population of 1,000,000 people). The risk-based concentrations were derived by using toxicity values, as discussed in part (b), and standard exposure parameters for a commercial/industrial land use. As the toxicity values for the COCs and the standard exposure parameters have not changed, the cleanup levels chosen are still valid. (d) The remedial action objectives identified in the 1999 Decision

Document, as they pertain to the remedy used at the site for the soil, are still valid. Additional investigation and evaluation is needed to determine if additional remedies should be selected for the groundwater.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There has not been any other information that has come to light that could call into question the protectiveness of the remedy that has been selected to date. The portion of Area B where surface soil contamination still remains is not adequately fenced. During the site visit, it was evident that the area could be accessed for recreational activities and that the boundary of the contaminated area is only separated from a residential area by a railroad easement. However, the cleanup of this area is expected to be complete in 2005, and the need for additional fencing may be reduced or eliminated with the completion of the soil cleanup.

Site Assessment Summary

At the present time, the majority of contaminated soils have been removed and the site remediate to a level that would allow for commercial use. Most of the site continues to have restricted access using existing fencing. Since the remedy is ongoing, the current measures are expected to be maintained until the final soil removal in Area B is completed.

VII. Recommendations and Follow-Up Actions

The soil remedy continues to be implemented. The work is expected to be completed by the end of 2005. When the soil remediation is complete, the PRPs will investigate the groundwater for site-related contamination.

Portions of Area B still to be remediated are not fully fenced. Completion of the soil remedy in this area is expected in 2005. If the completion of the soil remedy is delayed more than 12 months, EPA will re-evaluate the need for more formal access controls until the work can be completed.

VIII. Protectiveness Statement

As of January 2005, Areas A, C and most of Area B have been completed. There are remaining cleanup activities being planned in Area B. Final soil remediation activities are anticipated to

be completed by the end of 2005. The remedy for site-wide soils is expected to be protective of human health and the environment upon completion.

IX. Next Review

The next review will be conducted within five years of the signing date of this report.

Approved:

William McCabe, Acting Director
Emergency and Remedial Response Division

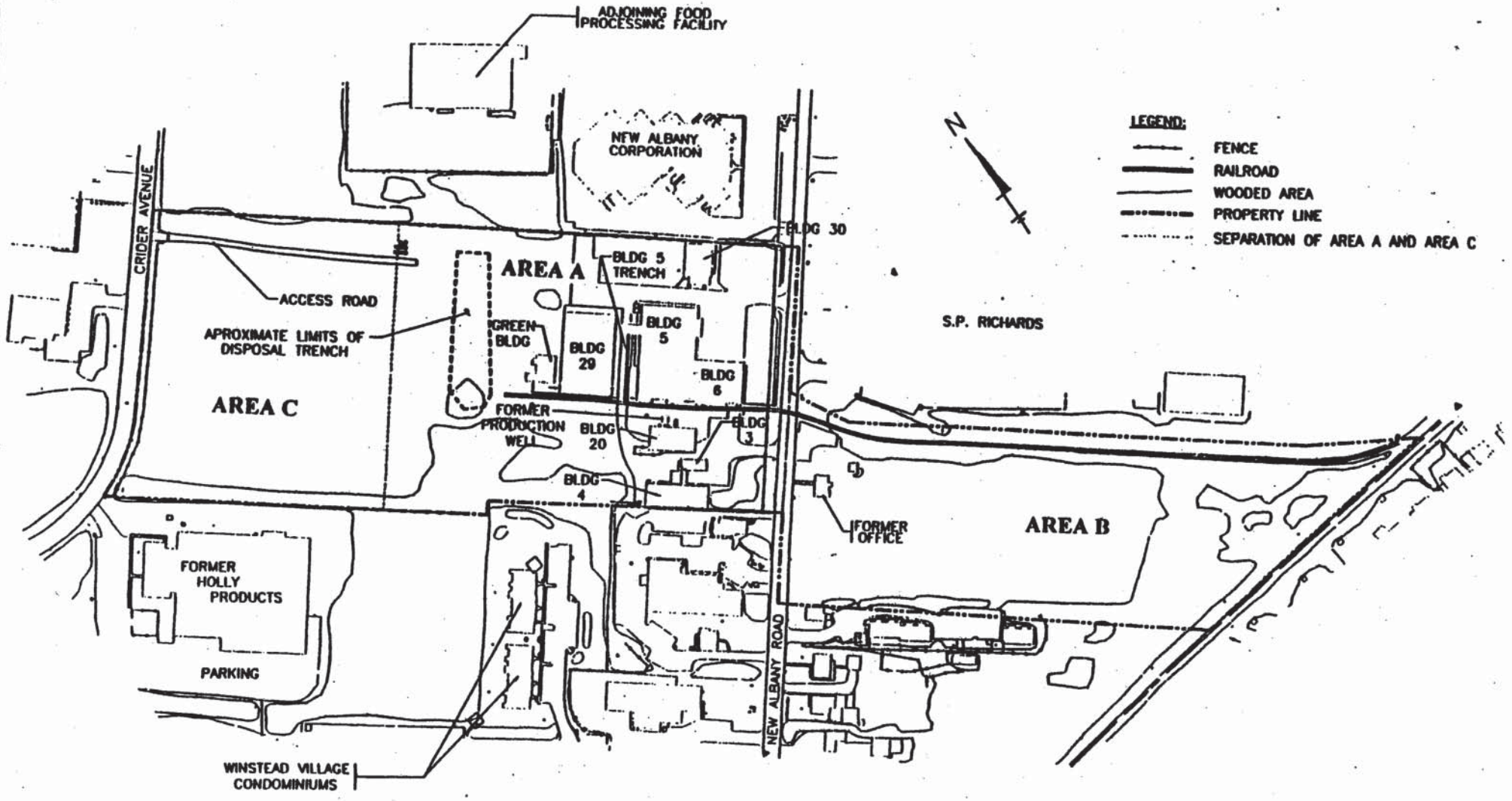
5-16-05
Date

APPENDIX A

Table 1: Chronology of Site Events	
Event/Activity	**Date**
International Pulverizing Co.’s manufacturing operations began	1935
Micronizer Company took over operations	1946
PPG assumed owner-operator status	1948
Pulverizing Services bought out PPG	1963
Plant was shut down and unoccupied	1979
NJDEP inspected the site and sampled the soils, surface water, and air, confirming pesticide contamination in soils and surface water.	1985
As requested by NJDEP, EPA takes site lead	1987
EPA investigates the entire site, confirming NJDEP’s findings in addition to uncovering several subsurface anomalies	1987
Under an AOC, PRP placed security fencing around property	1988
Under a 2nd AOC, PRP agrees to investigate the site for soil and groundwater contamination, in its entirety	1989
Phase I Site Investigation is performed	1989
Under a 3rd AOC, PRPs agree to remediate buildings 5, 6 and 29	1990
Phase II Site Investigation is performed	1994
Spring and Fall removals from adjacent properties	1996
December removal from an adjacent property	1998
Decision Document approved by EPA for contaminated soil removal	1999
Under a 4th AOC, PRP agrees to remove all pesticide-related soil contamination from the entire site	1999
Work Plan for site-wide soil removal is approved by EPA	2000
PRP performs soil remedy with EPA oversight	2001-2005 (on-going)

Table 2: Documents, Data, and Information Used in Completing Five-Year Review
▸ Administrative Order on Consent # 80108 dated May 2, 1988
▸ Administrative Order on Consent # 80109 dated March 31, 1989
▸ Phase I Investigation Document dated August 12, 1993
▸ Administrative Order on Consent # 00102 dated March 23, 1990
▸ Phase II Investigation Document dated November 10, 1995
▸ Response Measures Evaluation Report dated December 1997
▸ Decision Document dated July 23, 1999
▸ Administrative Order on Consent # 99-20389 dated September 29, 1999
▸ Removal Action Project Plan for site soils dated February 2000
▸ Bi-Weekly Removal Action Reports from April 2000 to January 2005

APPENDIX B



Pulverizing Services Site
Moorestown, New Jersey

Figure 1 Site Layout Map
Figure taken from the Feasibility Study Report

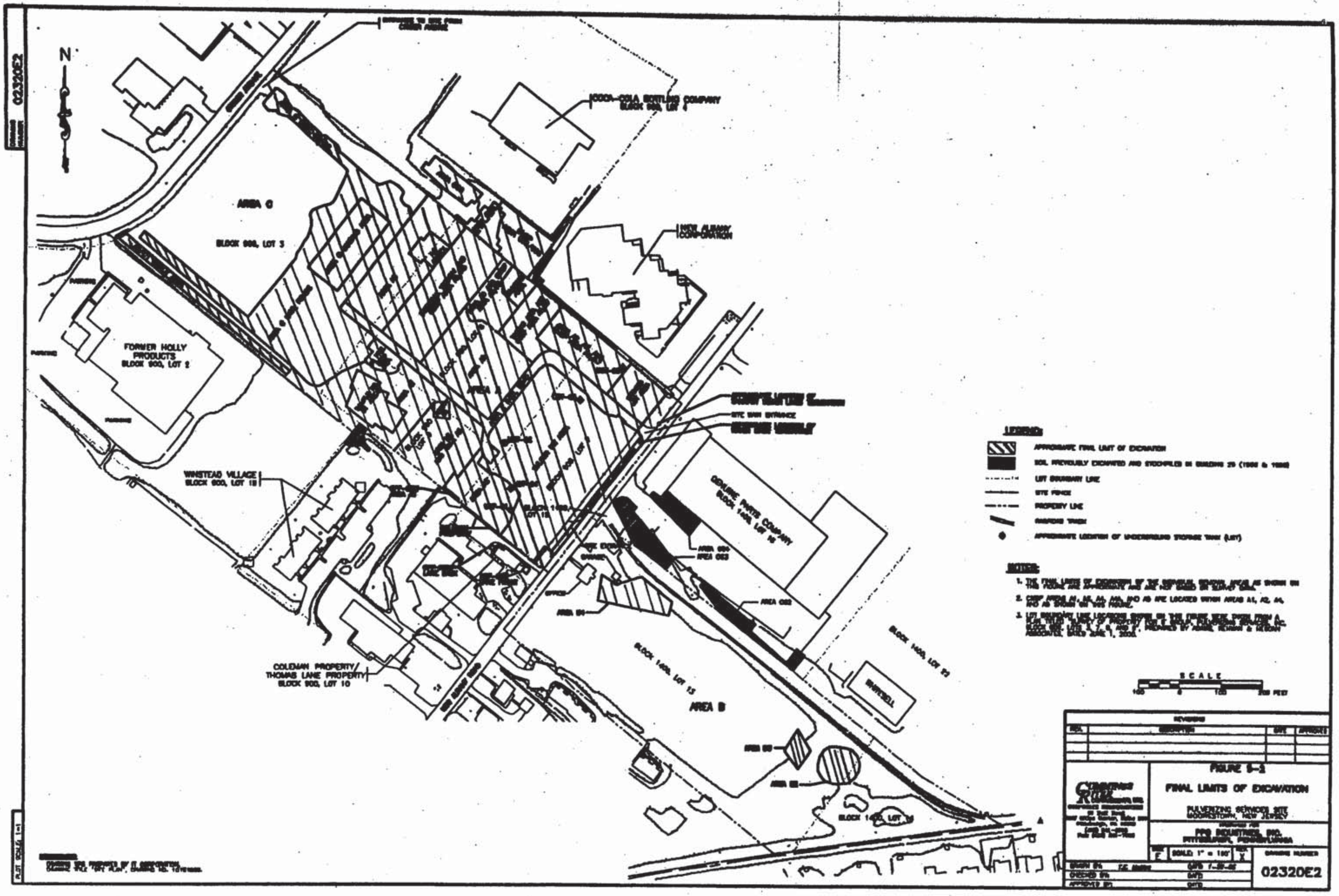

N
COCA-COLA BOTTLING COMPANY
AREA C
BLOCK 900, LOT 3
NEW ALBANY CORPORATION
FORMER HOLLY PRODUCTS
BLOCK 900, LOT 2
WINSTEAD VILLAGE
BLOCK 900, LOT 18
COLEMAN PROPERTY/
THOMAS LANE PROPERTY
BLOCK 900, LOT 10
SITE MAIN ENTRANCE
GENUINE PARTS COMPANY
BLOCK 1400, LOT 16
AREA B
BLOCK 1400, LOT 15
BLOCK 1400, LOT 22
LEGEND:
APPROXIMATE FINAL LIMIT OF EXCAVATION
LOT BOUNDARY LINE
SITE FENCE
PROPERTY LINE
NOTES:
SCALE
FIGURE 6-1
FINAL LIMITS OF EXCAVATION
PULVERIZING SERVICES SITE
MOORESTOWN, NEW JERSEY
PPG INDUSTRIES, INC.
PITTSBURGH, PENNSYLVANIA
02320E2

Figure 2