UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: SEP 26 2001

SUBJECT: Record of Decision for Operable Unit 2 of the Industrial Latex Site

FROM: Kathleen C. Callahan, Acting Director
for Emergency and Remedial Response Division John Frisco

TO: William J. Muszynski, P.E.
Acting Regional Administrator

Attached for your approval is the Record of Decision (ROD) for Operable Unit 2 of the Industrial Latex site. The site is located in the Borough of Wallington, Bergen County, New Jersey.

The selected no action remedy represents the final operable unit for the site. The ROD for the first operable unit, signed in September 1992, selected an action to address contaminated soil, drummed waste, chemical vats, and buildings at the site. This second action addresses ground water at the site.

As is explained in the attached ROD, no action is needed to address ground water at the site. No remedial action is warranted because the ground water at the site poses no unacceptable risk to human health or the environment.

The results of the remedial investigation and the Proposed Plan for this action were released to the public for comment on August 3, 2001. The public comment period ended on September 3, 2001. In addition, a public meeting was held on August 15, 2001. The comments received from local residents and officials on the proposed no action remedy did not necessitate a modification of the proposed remedy.

The ROD was developed by the U.S. Environmental Protection Agency and has been reviewed by the New Jersey Department of Environmental Protection, and the appropriate offices within Region II and Headquarters. Their input and comments are reflected in this document.

With the signing of this ROD, the site will qualify for listing on the Construction Completion List. A Preliminary Close Out Report for the site has been prepared and I will be signing that report once the ROD is signed.

If you have any questions concerning this ROD, I will be happy to discuss them at your convenience.

Attachment

81499

500001

DECLARATION STATEMENT

RECORD OF DECISION
Industrial Latex

SITE NAME AND LOCATION

Industrial Latex (EPA ID# NJD981178411)
Borough of Wallington, Bergen County, New Jersey
Operable Unit 2

STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected remedy for the Industrial Latex site in Wallington, New Jersey which was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the Administrative Record file for this site.

The State of New Jersey concurs with the selected remedy.

DESCRIPTION OF SELECTED REMEDY

This document applies to the second of two planned operable units for the Industrial Latex site. It addresses ground water at the site. A previous decision document, signed in September 1992, addressed contaminated soil, drummed waste, chemical vats, and buildings at the site. The U.S. Environmental Protection Agency (EPA), in consultation with the State of New Jersey, has determined that no site-related contaminants of potential concern are present at elevated levels in the ground water and, therefore, no action is needed to address ground water at the site. No remedial action is warranted because the ground water at the site poses no unacceptable risk to human health or the environment.

DECLARATION OF STATUTORY DETERMINATIONS

In accordance with the requirements of CERCLA and the NCP, it has been determined that no remedial action is necessary for the second operable unit of the Industrial Latex site to ensure protection of human health and the environment. However, because ground water in the area has been found to contain sporadic contamination that appears to be regional in nature, EPA recommends that the ground water not be used for potable water supply purposes without appropriate treatment.

EPA has determined that its response at this site is complete and no further action is required. Therefore, the site now qualifies for inclusion on the Construction Completion List.

The remedial activities at the Industrial Latex site removed all the hazardous substances and have left the site suitable for unlimited use and unrestricted exposure. In addition, no institutional controls are required. A five-year review of the remedy is not required, pursuant to CERCLA Section 121(c).

William J. Muszynski, P.E.
Acting Regional Administrator

9/27/01
Date

RECORD OF DECISION

DECISION SUMMARY

INDUSTRIAL LATEX SITE

BOROUGH OF WALLINGTON
BERGEN COUNTY, NEW JERSEY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

NEW YORK, NEW YORK

SEPTEMBER 2001

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APPENDICES

SITE NAME, LOCATION, AND DESCRIPTION

The Industrial Latex site is located at 350 Mount Pleasant Avenue in the Borough of Wallington, Bergen County, New Jersey. It is situated in a small valley between two northeast-southwest trending hills. The property encompasses 9.67 acres in a mixed residential/industrial area including an elementary school to the west; a tractor trailer storage area to the north; the New Jersey Transit railroad line to the east; and an outdoor recreational complex and residences to the south. Directly across the railroad tracks are residential homes in the Borough of Wood-Ridge, New Jersey (Figure 1).

The site is southeast of an extensive industrial development bordering the rail corridor. Industrial facilities near the site include the former Curtiss-Wright Corporation facility located in Wood-Ridge and Farmland Dairies located in Wallington. The Curtiss-Wright and Farmland Dairies facilities are currently undergoing environmental activities under the direction of the New Jersey Department of Environmental Protection (NJDEP).

The majority of the land use within a one-half mile radius of the Industrial Latex site is residential, while some land is zoned for commerce and industry. Major residential developments are closely situated to the east, west, and south of the site. According to 1990 census data, approximately 11,600 people live in Wallington and approximately 7,600 people live in Wood-Ridge.

Until 1985, the Borough of Wallington had maintained five public water supply wells within the Borough. Four of these wells are located within one mile of the site. However, the wells have been closed since 1985 due to contamination with volatile organic compounds (VOCs), including trichloroethene, tetrachloroethene, and trans-1,2-dichloroethene. The Passaic Valley Water Commission and United Water currently supply the potable water to Wallington and Wood-Ridge.

The site itself is currently a vacant lot. All structures and all on-site sources of contamination were removed during cleanup activities. Approximately 0.45 acre of restored wetland area is present in the northeast corner of the site. All other affected areas of the property have been seeded. Seventeen monitoring wells remain on the site.

This decision document was prepared by the U.S. Environmental Protection Agency (EPA) as the lead agency, with support from NJDEP. Site-related activities are being federally funded. This decision document relates to Operable Unit 2 (OU2) at the Industrial Latex site, which addresses ground water. A previous decision document selected a remedy for the first operable unit,

or OU1, which addressed contaminated soil, drummed waste, chemical vats, and buildings at the site.

SITE HISTORY AND ENFORCEMENT ACTIVITIES

The Industrial Latex Corporation manufactured natural and synthetic rubber compounds, and chemical adhesives from 1951 to 1980. Adhesives were initially formulated using vegetable protein in a solvent base. Solvents utilized in the process included acetone, heptane, hexane, methyl ethyl ketone (MEK), and methylene chloride. To reduce flammability, polychlorinated biphenyls (PCBs) were introduced as a fire retardant.

In the late 1970s, solvent-based adhesives were replaced by water-based latex adhesives. Intermittent processing of latex compounds continued at the site until October 1983, when all operations ceased. Poor operational procedures and on-site waste disposal practices resulted in widespread surface and subsurface soil contamination.

Prompted by numerous complaints from local officials about the misuse of solvents and the dumping of trash and chemicals on the property, NJDEP conducted a site inspection in 1980 and found approximately 250 leaking drums of various chemical compounds. In addition, NJDEP discovered that VOCs and materials contaminated with PCBs had been disposed of in an on-site sanitary septic system. NJDEP conducted a second site inspection in 1983 and discovered approximately 1,600 drums which were open, leaking, or lying on their sides. Analyses of the drum contents revealed the presence of acetone, hexane, MEK, dimethyl formamide, and 1,1,1-trichloroethane.

In 1985, NJDEP began enforcement efforts to have the site owner remove and properly dispose of all on-site drums and contaminated soil. By March 1986, however, only about 400 drums had been removed.

Because of the owner's inability to conduct a timely removal of the material, EPA initiated a removal action in 1986 to address immediate contaminant hazards present at the site. Sampling and analysis of on-site drums revealed the presence of benzene, ethylbenzene, toluene, xylene, and PCBs. By January 1987, EPA had removed 1,200 drums and 22 underground storage tanks from the site.

From May 1987 until January 1988, EPA conducted an expanded site inspection for the purpose of collecting additional data on the nature and extent of contamination. In addition, a fence was installed to restrict access to the site and reduce direct exposure to surface contamination. The site was proposed for inclusion on the National Priorities List of Superfund sites in

May 1988 and finalized in March 1989. EPA then initiated a Remedial Investigation and Feasibility Study (RI/FS) to determine the nature and extent of contamination at the Industrial Latex site, and to develop and evaluate alternatives to address the contamination.

Based on the RI/FS and after receiving public input, EPA issued a Record of Decision (ROD) in September 1992, which outlined the cleanup plan for the site. The plan included:

(1) excavation of contaminated soil and on-site treatment by low temperature thermal desorption, followed by backfilling on the site;

(2) excavation and off-site disposal of buried drums;

(3) dismantling and off-site disposal of vats; and

(4) demolition and off-site disposal of two buildings on the site.

Because the results of the ground water investigation were inconclusive, the 1992 ROD did not address ground water and called for a subsequent investigation.

On April 10, 1996, EPA issued an Explanation of Significant Differences changing or eliminating a number of remediation goals specified in the ROD. These changes were based on sampling conducted after the ROD was signed. Specifically, the remediation goals for beryllium, lead, heptachlor epoxide, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(ghi)perylene, chrysene, and indeno(1,2,3-cd)perylene were eliminated because these contaminants were not related to activities at the site and, further, were present at concentrations consistent with background levels. In addition, the remediation goal for arsenic was changed to be consistent with New Jersey background concentrations. The four remaining site-related contaminants of concern at the Industrial Latex site were PCBs, bis(2-ethylhexyl)phthalate, 3,3'-dichlorobenzidine, and arsenic. Table 1 lists the final remediation goals for the soil at the site.

The cleanup of the site involved two phases. Collectively, the two remedial phases represent OU1. The first phase, which included the demolition of the buildings and removal of the vats, started in July 1995 and was completed in November 1995. Field work for the second phase, addressing the soil and buried drums, began in December 1998 and was completed in August 2000.

The site was cleaned up to an unrestricted, residential use criteria, on average consistent with New Jersey's residential use criteria. The treatment of 93,429 tons of soil was completed on

June 6, 2000. This equates to approximately 53,600 cubic yards of contaminated material that were excavated. The maximum depth of excavation was about 14 feet below the ground surface. An average of 225 tons of contaminated soil was treated per day over the length of the project. A total of 15,000 tons of filter cake and other waste, and 280 drums, were disposed of at approved off-site facilities. Air monitoring was conducted daily at the perimeter of the site throughout the length of the soil treatment activity and no elevated PCB or dust levels were ever detected.

An inspection was held on August 2, 2000, at which time all site work was found to be complete except for the laying of hydroseed, which occurred on August 28, 2000. A final inspection, primarily to monitor the condition of the restored wetland and the success of the hydroseeding, was held on August 14, 2001.

EPA sent notice letters to five potentially responsible parties (PRPs) on March 26, 1986. On July 31, 1986, EPA issued a Unilateral Administrative Order to all five of these PRPs demanding that they perform removal actions at the site. None of the PRPs offered to perform this work. In January 1988, EPA filed a lien on the site property pursuant to Section 113 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended. In addition, EPA sent a letter, dated January 4, 1988, to two of the PRPs demanding that they reimburse EPA for $1,524,000 in past costs related to removal activities at the site. Neither party offered to provide EPA with such reimbursement. On March 17, 1992, EPA sent information request letters to three firms believed to have information relating to the disposal of waste material at the site. The responses did not indicate that the firms had any involvement with the Industrial Latex site. On July 19, 2001, the U.S. Department of Justice, on behalf of EPA, filed a complaint to secure EPA's portion of the 1988 lien. Resolution of this complaint is still pending.

HIGHLIGHTS OF COMMUNITY PARTICIPATION

The RI report and the Proposed Plan for OU2 were released to the public for comment on August 3, 2001. These documents were made available to the public at the EPA Region II Office in New York City, at the Wallington Public Library, and at the Wood-Ridge Memorial Library. The notice of availability for these documents was published in *The Bergen Record* on August 3, 2001. A public comment period was held from August 3, 2001 through September 3, 2001.

During the public comment period, EPA held a public meeting to present the results of the RI and the Proposed Plan, to answer questions, and to accept both oral and written comments. The public meeting was held at the Wallington Council Chambers,

Wallington, New Jersey on August 15, 2001. At this meeting, representatives from EPA answered questions about the site and the proposed No Action remedy, and received comments from the local citizens. Comments and responses to comments received during the public comment period and public meeting are included in the Responsiveness Summary, which is attached as Appendix V.

SCOPE AND ROLE OF OPERABLE UNIT

The decision described herein relates to the second of two operable units at the site. The September 1992 ROD addressed OU1, and specified the treatment by low temperature thermal desorption of contaminated soil on-site and the disposal of contaminated vats, drums, and buildings at the site. All known site sources were removed during the OU1 cleanup activities.

This ROD addresses OU2, the ground water at the Industrial Latex site. Based on the findings in the OU2 RI report, the ground water does not pose an unacceptable risk to human health or the environment. EPA plans no further activities at the site. However, NJDEP has indicated that it will continue to monitor the ground water in the area for the low-level VOCs that were detected on-site.

SITE CHARACTERISTICS

Site Geology and Hydrology

The 9.67-acre Industrial Latex site lies within the physiographic region known as the Triassic Lowlands, which is a subdivision of the Piedmont Province. In general, the lowland terrain consists of a gently rolling surface that varies in altitude from one foot to 200 feet above mean sea level (MSL). The lowland is underlain by igneous and sedimentary rocks of Jurassic and Triassic Age, respectively. The sedimentary bedrock deposits of shale, siltstone, and sandstone belong to the Brunswick Formation of the Newark Group. The Brunswick Formation is also referred to as the Passaic Formation. The igneous bedrock consists of basalt and diabase intrusions that form highly resistant ridges, which are expressed at the surface as the Watchung Mountains. The site is located in a small valley between two, northeast-southwest trending hills. The site has an average elevation of about 63 feet above MSL. The hill to the west of the site has an elevation of 120 feet above MSL. To the east, another ridge of hills rises to an altitude of 200 feet above MSL.

The sedimentary beds strike north to northeast and dip west to northwest at 10 degrees. A prominent set of joints parallels the strike of the beds; a less prominent set strikes in a northwest direction. In 1986, the United States Geological Survey (USGS) performed geophysical logging on the Borough of Wallington's

Spring Street well, located approximately 450 feet south of the site. Based on this logging, the USGS inferred that major fracture zones exist at 36 to 40 feet and 53 to 66 feet below ground surface at this location, with numerous small fractures down the rest of the 392-foot well.

Bedrock at the site is overlain by approximately 35 feet of glacial deposits. The glacial deposits are thicker (30 to 50 feet) in the eastern portion of the site and relatively thin (6 to 8 feet) in the western portion due to the sharp rise in bedrock elevation in this area.

The Industrial Latex site lies in the Passaic River Basin near the boundary with the Hackensack River Basin. The site runoff flows eastward into an intermittent drainage ditch adjacent to the New Jersey Transit railroad tracks. The railroad corridor along the western side of the tracks forms an effective barrier to eastward migration of surface water runoff and functions as a surface water capture zone which channels drainage in a northerly direction. This drainage channel ordinarily flows only during periods of excessive precipitation. A storm water sewer for Spring Court channels precipitation from Spring Court to a discharge area located near the southeastern corner of the site property. There are two major swales on the site that carry the majority of site surficial runoff to the drainage channel parallel to the railroad.

The Passaic River is located approximately 3,000 feet west of the site. The Passaic River is a tidal water body that flows into Newark Bay.

Ground water is present in both the unconsolidated and consolidated subsurface material at the Industrial Latex site. The Brunswick bedrock aquifer is the primary water-bearing unit in the area. The depth to water at the site ranges from 10 feet below ground surface in the eastern portion to approximately 20 feet below ground surface in the western portion. The difference in depth to ground water corresponds to the change in topography between the eastern and western portions of the site.

Four ground water studies have been completed at the site. These are described below.

Expanded Site Inspection

Prior to the 1992 RI, eleven monitoring wells were installed as part of an ESI performed at the site in 1987 (Figure 2). Water from the wells was sampled for VOCs, semi-volatile organic compounds (SVOCs), pesticides, PCBs, and metals. The investigation indicated that low concentrations of VOCs, bis(2-ethylhexyl)phthalate, and metals were present in the ground water

(Table 2). PCBs were not found to be present in water from any of the wells.

1992 Remedial Investigation

During the 1992 RI, five additional wells were installed at specific locations throughout the site to supplement the existing monitoring well network (Figure 2).

Water from the 16 on-site wells was sampled for VOCs, SVOCs, pesticides, PCBs, and metals. The investigation indicated that low concentrations of VOCs, PCBs, bis(2-ethylhexyl)phthalate, and metals were detected in the ground water (Table 3). However, the results from two rounds of sampling were not consistent. While PCBs were detected during both sampling rounds, the results ranged from 50 parts per billion (ppb) to 0.18 ppb in the same well. In addition, the data generated was not sufficient to determine whether the low concentrations of VOCs and metals found in the ground water were the result of activities at the site or migration from off-site sources.

Area Ground Water Evaluation

Because the results of the 1992 RI were inconclusive, in 1995 EPA initiated further study into the ground water situation, the results of which are shown in the Area Ground Water Evaluation Report. The purpose of the study was twofold. The first was to compare the potential on-site sources of contamination at Industrial Latex to the contaminants found in the ground water. The potential on-site sources included drums, underground storage tanks, a septic system, and the soil. The second purpose of the study was to identify ground water contamination associated with other facilities in the area of Industrial Latex and compare this with the contamination found at Industrial Latex. Figure 3 shows the location of several facilities located within a one-mile radius of the Industrial Latex site.

The Area Ground Water Evaluation Report showed that many of the contaminants found in the ground water at Industrial Latex were not present in any of the potential Industrial Latex site sources. The report also showed that the presence of contamination in the ground water appears to be common in the area and may not be attributable to any one source. The levels of contamination at Industrial Latex are generally consistent with background conditions in the area.

2001 Remedial Investigation

In spring 2000, EPA conducted a final ground water sampling effort to clarify its understanding of the site ground water. In addition to 14 of the original wells sampled during the 1992 RI, EPA sampled seven new wells installed to more accurately detect

any potential contamination (Figure 4). Again, water from these wells was tested for VOCs, SVOCs, pesticides, PCBs, and metals.

Low levels of VOCs and metals were detected in the wells (Table 4). However, of the four site-related chemicals of concern at Industrial Latex, only arsenic was found to be present in the ground water, and at concentrations below federal and state drinking water standards. The concentration of arsenic was measured at a maximum of 6.4 ppb, compared to the drinking water standard of 50 ppb and the New Jersey ground water quality standard of 8 ppb. PCBs, bis(2-ethylhexyl)phthalate, and 3,3'-dichlorobenzidine were not detected in the ground water.

CURRENT AND POTENTIAL FUTURE LAND AND RESOURCE USES

The site is currently vacant. The majority of the 9.67-acre site is covered with grass. A 0.45-acre wetland area is present in the north-eastern corner of the property.

Site soils were cleaned to a level that allows for unrestricted, residential use. Municipal facilities supply water to both Wallington and Wood-Ridge. Based on the extent of the soil remediation, the site may be developed for any future use, including residential, recreational, commercial, or industrial purposes.

SITE RISKS

The contaminants of concern during the soil cleanup at the Industrial Latex site were PCBs, bis(2-ethylhexyl)phthalate, 3,3'-dichlorobenzidine, and arsenic. All site-related contamination that could have been a potential source of ground water contamination has been removed.

In general, a baseline risk assessment is performed at sites to determine whether a remedial action is warranted. However, according to the EPA Office of Solid Waste and Emergency Response Directive Number 9355.0-30, "Chemical specific standards that define acceptable risk levels (e.g., non-zero MCLGs, MCLs) also may be used to determine whether an exposure is associated with an unacceptable risk to human health or the environment." A Maximum Contaminant Level Goal, or MCLG, is the level at which a person could drink two liters of water containing the contaminant every day for 70 years without suffering any ill effects. Safe Drinking Water Act Maximum Contaminant Levels, or MCLs, are legal limits set as close to the health goals as possible, keeping in mind technical and financial barriers that exist. The directive goes on to state that, for ground water actions, "MCLs and non-zero MCLGs will generally be used to gauge whether remedial action is warranted."

During the most recent ground water sampling events, no site-related contaminants of potential concern (i.e., PCBs, bis(2-ethylhexyl)phthalate, 3,3'-dichlorobenzidine, and arsenic) were present at levels above New Jersey or federal drinking water standards. Therefore, according to the above-referenced directive, no remedial action is warranted for the ground water at the site, and the site poses no unacceptable risk to human health. In addition, none of the contaminants of concern were found to be present above Ambient Water Quality Criteria, which are used to evaluate surface water quality. Therefore, the site does not pose an unacceptable risk to the environment via potential migration of ground water to surface water.

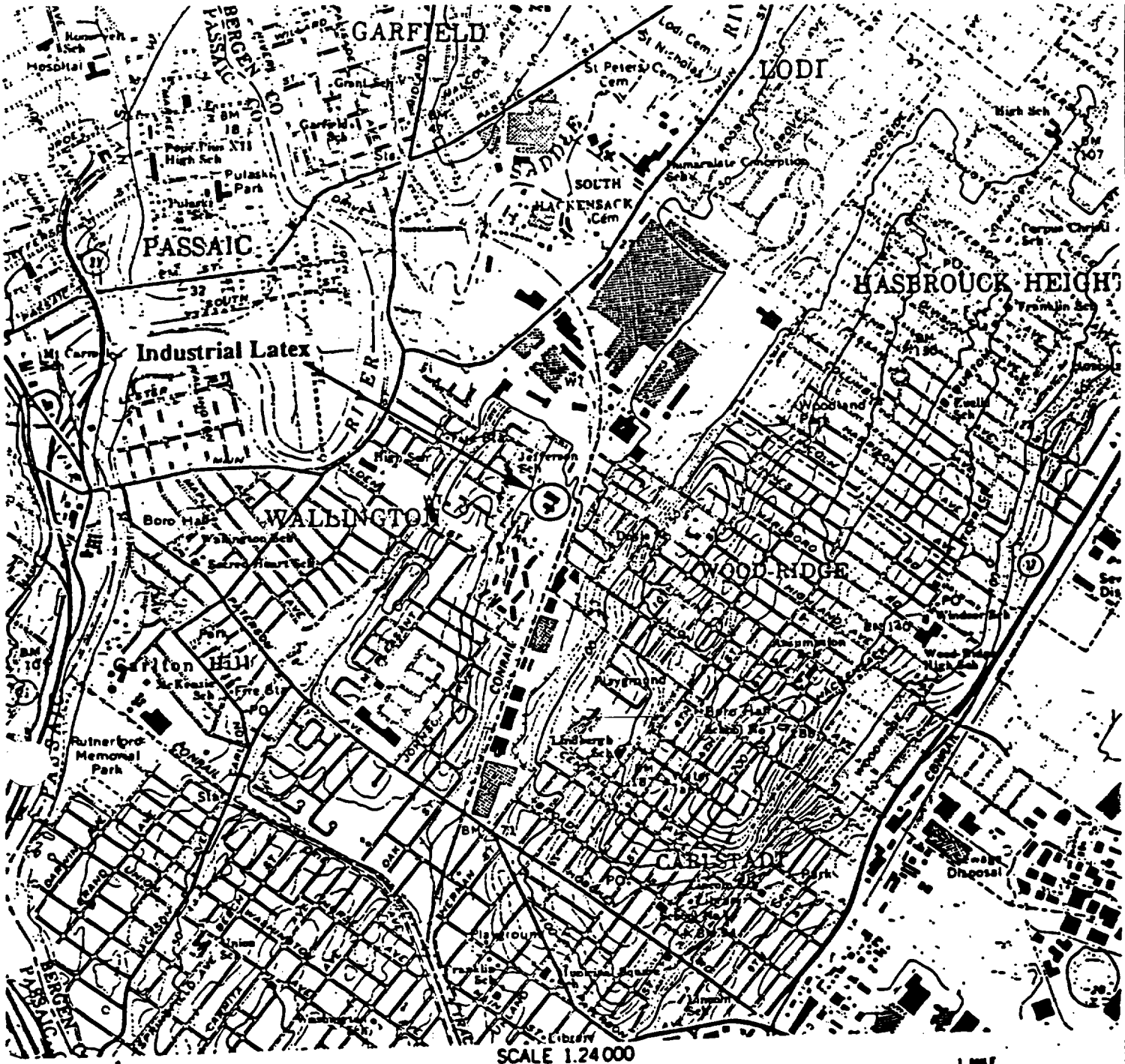
To further confirm the site poses no unacceptable risk, EPA also performed a risk-based toxicity screening for all chemicals detected in the ground water at the Industrial Latex site (Tables 5a and 5b). The risk-based toxicity screening indicated a baseline risk assessment did not need to be performed. Most chemicals detected in the ground water were either found at concentrations below risk-based screening levels or do not have toxicity information. Arsenic was detected at concentrations above its screening level, but below a level at which EPA would take action. Again, the risk-based toxicity screening confirmed that no remedial action is warranted and that the site poses no unacceptable risk to human health or the environment.

DOCUMENTATION OF SIGNIFICANT CHANGES

The Proposed Plan for OU2 of the Industrial Latex site was released for public comment on August 3, 2001. The Proposed Plan identified No Action as the preferred remedy for ground water at the site. EPA reviewed all comments received during the public comment period. It was determined that no significant changes to the no action remedy, as originally identified in the Proposed Plan, were necessary or appropriate.

APPENDIX I

FIGURES



Source: United States Geological Survey (1981)

CDM FEDERAL PROGRAMS CORPORATION

INDUSTRIAL LATEX AREA GROUNDWATER EVALUATION

Industrial Latex Site Location Map

Figure 1

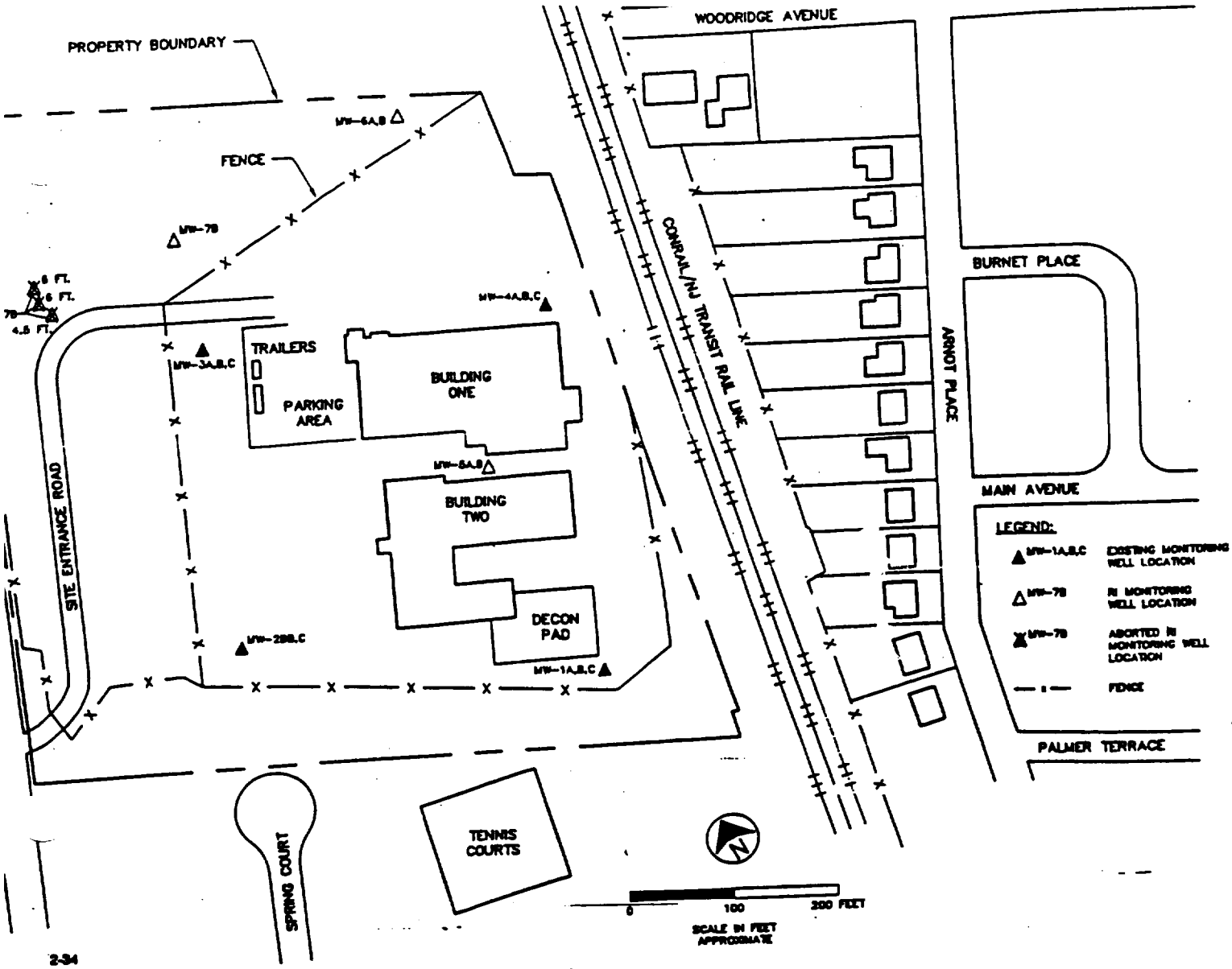
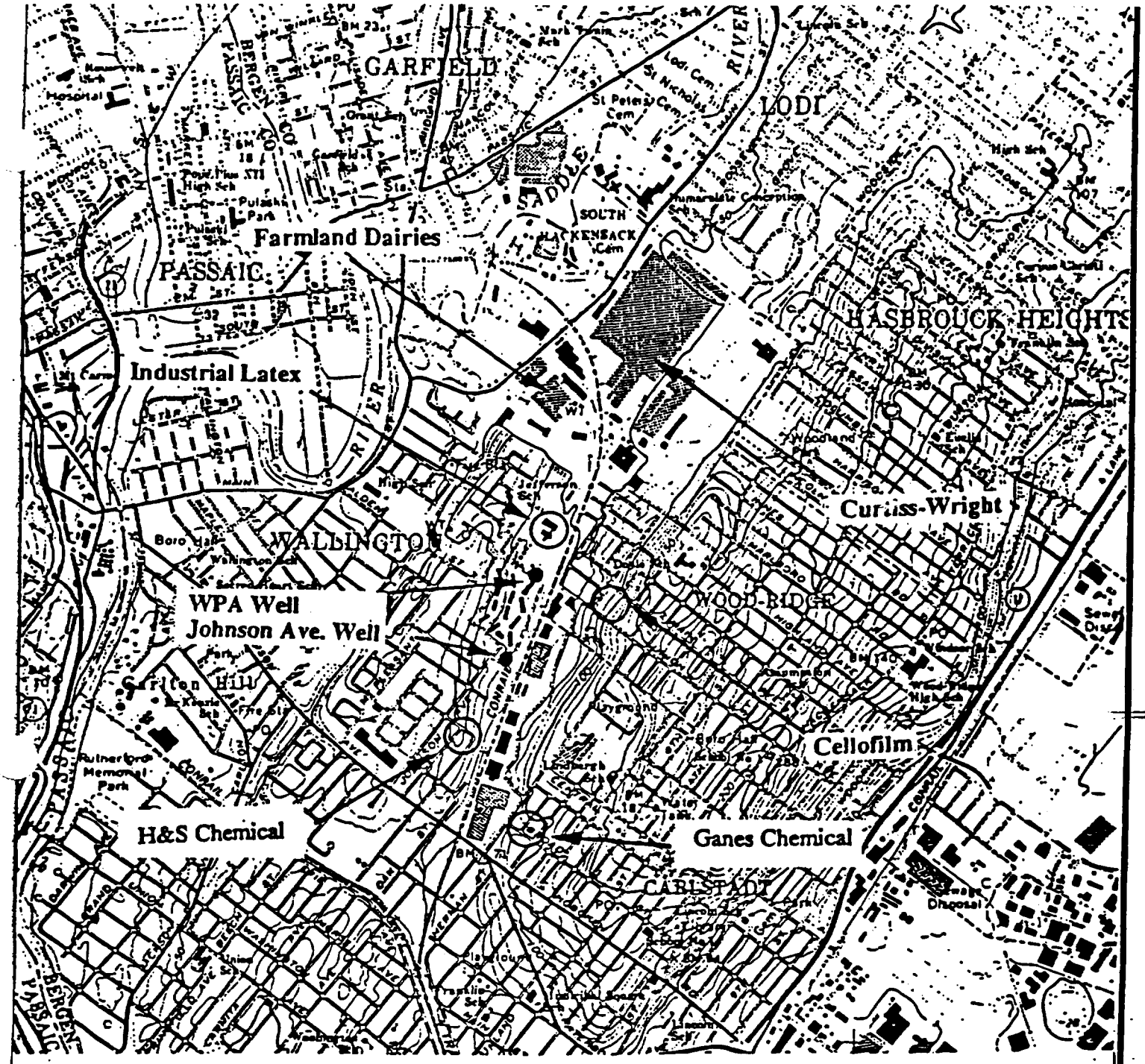


Figure 2
1992 Remedial Investigation
Monitoring Well Locations



Source: United States Geological Survey (1981)

CDM FEDERAL PROGRAMS CORPORATION

INDUSTRIAL LATEX AREA GROUNDWATER EVALUATION

Industrial Latex and Area Sites Location Map

Figure 3

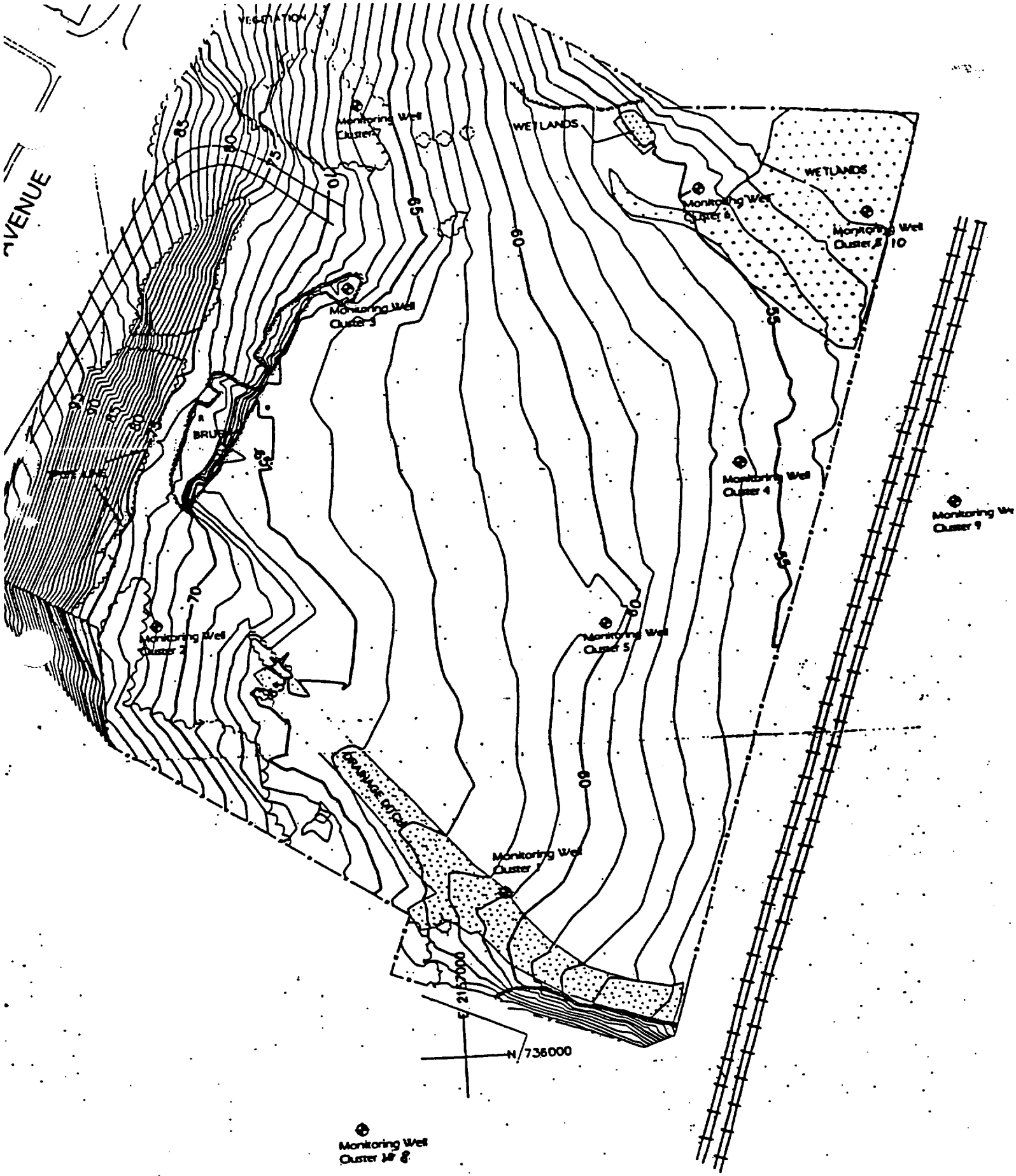


Figure 4
Monitoring Well Cluster Locations

APPENDIX II

TABLES

Table 1
Operable Unit 1
Soil Remediation Goals

Contaminant	Remediation Goal (ppm)
PCBs	1
Bis(2-ethylhexyl)phthalate	46
Arsenic	20
3,3-Dichlorobenzidine	1.4

Table 2

RESULTS OF GROUNDWATER SAMPLING AT THE INDUSTRIAL LATEX SITE
FOR NSL POLLUTANTS
AUGUST 17-19, 1987

VOLATILES

SAMPLE NUMBER	INJ07-GW1	INJ07-GW2	INJ07-GW3	INJ07-GW4	INJ07-GW5	INJ07-GW6	INJ07-GW7	INJ07-GW8	INJ07-GW8D	INJ07-GW9	INJ07-GW10	INJ07-GW11	INJ07-RINE	INJ07-TBL1	INJ07-TBL2	INJ07-TBL3
TRAFFIC REPORT NUMBER	BW103	BW104	BW105	BW106	BW107	BW108	BW109	BW110	BW111	BW112	BW113	BW114	BW119	BW122	BW123	BW124
WELL NUMBER	MW-1A	MW-1B	MW-1C	MW-2B	MW-2C	MW-3A	MW-3B	MW-3C	MW-3C DUP1	MW-4A	MW-4B	MW-4C	RIN BLK	TRP BLK	TRP BLK	TRP BLK
MATRIX	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER
UNITS	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chloromethane																
Bromomethane																
Vinyl Chloride																
Chloroethane																
Methylene Chloride	8	8	8	8	8	8	8	8	8	8	8	10				
Acetone	37 B	210 B	200 B	8			8	16 B		4	8	8	2 JB	2 J	3 JB	3 JB
Carbon Disulfide																13
1,1-Dichloroethene																
1,1-Dichloroethane																
Trans-1,2-Dichloroethene										3 J	3 J	7				
Chloroform				3 J		14		3 J	3 J	9	7					
1,2-Dichloroethane																
2-Butanone																
1,1,1-Trichloroethane																
Carbon Tetrachloride																
Vinyl Acetate																
Bromodichloromethane																
1,1,2,2-Tetrachloroethane																
1,2-Dichloropropane																
Trans-1,3-Dichloropropene										7	6					
Trichloroethene																
Dibromochloromethane																
1,1,2-Trichloroethane																
Benzene		8														
Cis-1,3-Dichloropropene										1 J						
2-Chloroethylvinylether																
Bromoform																
2-Hexanone																
4-Methyl-2-Pentanone																
Tetrachloroethene																
Toluene																
Chlorobenzene																1 J
Ethylbenzene																
Styrene																
Total Xylenes																2 J

NOTES TO ORGANICS DATA:

Blank space - compound analyzed for but not detected

B - analysis did not pass EPA QA/QC requirements

J - compound present above the instrument detection limit, but below the contract-specified detection limit.

B - compound found in laboratory blank as well as the sample, and indicates possible/probable blank contamination.

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TABLE 2, CONTINUED

RESULTS OF GROUNDWATER SAMPLING AT INDUSTRIAL LATEX SITE
FOR HSL PRIORITY POLLUTANTS
AUGUST 17-19, 1987

PARAMETER																			
SAMPLE NUMBER	IN387-GW1	IN387-GW2	IN387-GW3	IN387-GW4	IN387-GW5	IN387-GW6	IN387-GW7	IN387-GW8	IN387-GW9	IN387-GW10	IN387-GW11	IN387-GW12	IN387-GW13	IN387-GW14	IN387-RI-1	IN387-TBL1	IN387-TBL2	IN387-TBL3
EPA REPORT NUMBER	PW103	PW104	PW105	PW106	PW107	PW108	PW109	PW110	PW111	PW112	PW113	PW114	PW119	PW122	PW123	PW124		
LABORATORY NUMBER	MW-1A	MW-1B	MW-1C	MW-2B	MW-2C	MW-3A	MW-3B	MW-3C	MW-3C DUP	MW-4A	MW-4B	MW-4C	RIN BLK	TRP BLK	TRP BLK	TRP BLK		
MATRIX	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER
UNITS	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
-Chloroethyl)Ether																		
rophenol																		
ichlorobenzene																		
ichlorobenzene																		
l Alcohol																		
)ichlorobenzene																		
thylphenol																		
2-Chloroisopropyl)Ether																		
thylphenol																		
troso-Di-n-Propylamine																		
chloroethane																		
obenzene																		
phorone																		
itrophenol																		
-Dimethylphenol																		
zoic Acid																		
(2-Chloroethoxy)Methane																		
-Dichlorophenol																		
,4-Trichlorobenzene																		
phthalene																		
Chloroaniline																		
xachlorobutadiene																		
Chloro-3-Methylphenol																		
Methylnaphthalene																		
xachlorocyclopentadiene																		
4,6-Trichlorophenol																		
4,5-Trichlorophenol																		
-Chloronaphthalene																		
-Nitroaniline																		
imethyl Phthalate																		
cenaphthylene																		
-Nitroaniline																		
cenaphthene																		
,4-Dinitrophenol																		
-Nitrophenol																		
)ibenzofuran																		
,4-Dinitrotoluene																		
,6-Dinitrotoluene																		
Diethylphthalate																		
4-Chlorophenylphenyl ether																		
Fluorene																		
4-Nitroaniline																		

Table 2, Continued

RESULTS OF GROUNDWATER SAMPLING AT THE INDUSTRIAL LAKE SITE
FOR HSL POLLUTANTS
AUGUST 17-19, 1987

SEMI VOLATILES																		
SAMPLE NUMBER	INJ07-GW1	INJ07-GW2	INJ07-GW3	INJ07-GW4	INJ07-GW5	INJ07-GW6	INJ07-GW7	INJ07-GW8	INJ07-GW8D	INJ07-GW9	INJ07-GW10	INJ07-GW11	INJ07-RIN1	INJ07-TBL1	INJ07-TBL2	INJ07-TBL3
TRAFFIC REPORT NUMBER	BW103	BW104	BW105	BW106	BW107	BW108	BW109	BW110	BW111	BW112	BW113	BW114	BW119	BW122	BW123	BW124
WELL NUMBER	MW-1A	MW-1B	MW-1C	MW-2BR	MW-2C	MW-3A	MW-3B	MW-3C	MW-3C DUP1	MW-4A	MW-4B	MW-4C	RIN BLK	TRP BLK	TRP BLK	TRP BLK
MATRIX	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER
UNITS	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
4,6-Dinitro-2-Methylphenol																
N-Nitrosodiphenylamine																
4-Bromophenylphenyl ether																
Hexachlorobenzene																
Pentachlorophenol																
Phenanthrene																
Anthracene																
Di-n-Butylphthalate																
Fluoranthene																
Pyrene																
Butylbenzylphthalate																
3,3'-Dichlorobenzidine																
Benzo(a)Anthracene																
Bis(2-Ethylhexyl)Phthalate		10 J														
Carysene																
Di-n-Octyl Phthalate																
Benzo(b)Fluoranthene																
Benzo(k)Fluoranthene																
Benzo(a)Pyrene																
Indeno(1,2,3-cd)Pyrene																
Dibenzo(a,h)Anthracene																
Benzo(ghi)Perylene																

NOTES TO ORGANICS DATA:

Blank space - compound analyzed for but not detected
B - analysis did not pass EPA QA/QC requirements
J - compound present above the instrument detection limit, but below the contract-specified detection limit.
B - compound found in laboratory blank as well as the sample, and indicates possible/probable blank contamination
NR - analysis not required

Table 2, Continued

RESULTS OF GROUNDWATER SAMPLING AT THE INDUSTRIAL LATEX SITE
FOR HSL POLLUTANTS
AUGUST 17-19, 1987

PESTICIDES/PCBs																		
SAMPLE NUMBER	INJ07-GW1	INJ07-GW2	INJ07-GW3	INJ07-GW4	INJ07-GW5	INJ07-GW6	INJ07-GW7	INJ07-GW8	INJ07-GW8DUP	INJ07-GW9	INJ07-GW10	INJ07-GW11	INJ07-RIN1	INJ07-TBL1	INJ07-TBL2	INJ07-TBL3
TRAFFIC REPORT NUMBER	BW103	BW104	BW105	BW106	BW107	BW108	BW109	BW110	BW111	BW112	BW113	BW114	BW119	BW122	BW123	BW124
WELL NUMBER	MW-1A	MW-1B	MW-1C	MW-2BR	MW-2C	MW-3A	MW-3B	MW-3C	MW-3C DUP1	MW-4A	MW-4B	MW-4C	RIN BLK	TRP BLK	TRP BLK	TRP BLK
MATRIX	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER
UNITS	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Alpha-BHC																
Beta-BHC																
Delta-BHC																
Gamma-BHC (Lindane)																
Heptachlor																
Aldrin																
Heptachlor Epoxide																
Endosulfan I																
Dieldrin																
4,4'-DDE																
Endrin																
Endosulfan II																
4,4'-DDD																
Endosulfan sulfate																
Endrin Aldehyde																
4,4'-DDT																
Methoxychlor																
Endrin Ketone																
Chlordane																
Toxaphene																
Aroclor-1016																
Aroclor-1221																
Aroclor-1232																
Aroclor-1242																
Aroclor-1248																
Aroclor-1254																
Aroclor-1260																

NOTES TO ORGANICS DATA:

Blank space - compound analyzed for but not detected
B - analysis did not pass EPA QA/QC requirements
J - compound present above the instrument detection limit, but below the contract-specified detection limit.
B - compound found in laboratory blank as well as the sample, and indicates possible/probable blank contamination.
NR - analysis not required

Table 2, continued

OF GROUNDWATER SAMPLING AT THE INDUSTRIAL LATEX SITE
FOR HSL POLLUTANTS
AUGUST 17-19, 1987

INORGANICS													
SAMPLE NUMBER	INJ07-GW1	INJ07-GW2	INJ07-GW3	INJ07-GW4	INJ07-GW5	INJ07-GW6	INJ07-GW7	INJ07-GW8	INJ07-GW9	INJ07-GW10	INJ07-GW11	INJ07-RIN1
TRAFFIC REPORT NUMBER	MBL 897	MBL 898	MBL 899	MBL 900	MBL 901	MBL 902	MBL 903	MBL 904	MBL 905	MBL 906	MBL 907	MBL 913
WELL NUMBER	MW-1A	MW-1B	MW-1C	MW-2B	MW-2C	MW-3A	MW-3B	MW-3C	MW-4A	MW-4B	MW-4C	RIN BLK
MATRIX	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER
UNITS	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Aluminum	1520	12200	7550	19300	1280	14800	3220	41400	1280	1300	10000	
Antimony					(47)							
Arsenic	(6.8)		(6.8)	10.1		(7.4)		29.5				
Barium	537	401	1020	384	257	310	(191)	443	274	400	959	
Beryllium												
Cadmium		7.1			(4)	5.9		8.3			(4.3)	
Calcium	74400	54400	142000	106000	74300	64600	29700	58600	88300	96800	109000	
Chromium	10.6	120	45.2	57.3	21.6	42.5	18.6	73.7		22.4	17	
Cobalt		(9.3)	(9.4)	(11)		(10)		(19.6)		(8.5)		
Copper	37.6	35.4	36	56.7	38.1	97	104	286	(23.4)	29.5	72.1	(10.3)
Iron	2300	16900	10400	23100	1880	20300	3620	45600	5130	1950	15900	
Lead	22.6	64	22.8	26.4	13.3	42.7	19.8	64.5	10.7	9.65	22	
Magnesium	15100	8470	18100	15600	8930	12600	5920	14200	17300	20000	26900	
Manganese	1450	1670	2010	453	59.1	516	65.3	1730	2770	2900	1170	
Mercury												
Nickel	(6)	69	(18.7)	(39.3)		(21.7)	(7.3)	58.9		(19)	(33.1)	
Potassium	(1910)	5040	21700	7240	(832)	6790		8350			13300	
Selenium	0	0	0	0	0	0		0	0	0		0
Silver												
Sodium	18700	7220	35300	21500	14000	62000	7390	123000	20900	35600	38000	10450
Thallium												
Tin												
Vanadium		(14)		(32.6)		(23)		66.5			(23)	
Zinc	105 E	201 E	87.1 E	332 E	114 E	291 E	94.2	640 E	136 E	189 E	147	20.4 E
Cyanide												

NOTES TO INORGANICS DATA:
Blank space - compound analyzed for but not detected
0 - analysis did not pass EPA QA/QC requirements
()- compound present above the instrument detection limit,
but below the contract-specified detection limit.
B - compound found in laboratory blank as well as the sample and
indicates possible/probable blank contamination
E - value estimated due to interference
NR- analysis not required

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INDUSTRIAL LATEX RI REPORT
SHALLOW WELL GROUNDWATER SAMPLES THAT EXCEED ARARS

COMPOUNDS	ARAR* (ug/l)	MW-1A (ROUND 1)	MW-1A (ROUND 3)	MW-2SS (ROUND 1)	MW-2SS (ROUND 3)	MW-3A (ROUND 1)	MW-3A (ROUND 3)	MW-4A (ROUND 1)	MW 4A (ROUND 3)	MW-5A (ROUND 1)	MW-5A (ROUND 3)	MW-6A (ROUND 1)	MW-6A (ROUND 3)
Benzene	1 (1)												
Trichloro-ethene	1 (1)							1.9 J	1.8				
Tetrachloro-ethene	1 (1)							1.9 J					
Total Xylenes	44 (40)									78			
1,1-Dichloro-ethene	2 (2)							3.5 J					
Bis(2-ethyl-hexyl) phthalate	(30)									52			
Aroclor 1260	0.5 (0.5)									4.2	0.7 J		
Arsenic	50 (8)	24.3						20.2		23.3			
Barium	1000 (2000)									1070			
Cadmium	10 (4)									10.0			
Chromium	50 (100)				634					153		64.0 J	
Lead	50 (10)			17.6 J		20.9 J		132 J		338	47.1 S	14.5 SJ	
Nickel	(100)									211		188 J	
1,2-Dichloro-propane	(1)							1.0 J					

All concentrations reported in ug/L.
J = Estimated value.
Duplicate concentrations have been reported as an average of the two samples
* = The other ARARs are state or federal maximum contaminant levels.
Concentrations in parentheses are the proposed NJDEPE groundwater cleanup standards which are State To Be Considered criteria (TBCs)

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Table 3, Continued

INDUSTRIAL LATEX RI REPORT
INTERMEDIATE WELL GROUNDWATER SAMPLES THAT EXCEED ARARs

COMPOUNDS	ARAR* (ug/l)	MW-1B (Round 1)	MW-1B (Round 3)	MW-3C (Round 1)	MW-3C (Round 3)	MW-4B (Round 1)	MW-4B (Round 3)	MW-5B (Round 1)	MW-5B (Round 3)	MW-6B (Round 1)	MW-6B (Round 3)	MW-7B (Round 1)	MW-7B (Round 3)
Benzene	1 (1)		3.0					2.7	3.3				
Trichloro-ethene	1 (1)					1.5 J							
Tetrachloro-ethene	1 (1)					1.0 J							
Aroclor 1260	0.5 (0.5)							50.0					
Arsenic	50 (8)					20.7		11.6 J					
Barium	1000 (2000)							1720	1340				
Lead	50 (10)	26.7 J	15.8	22.1 J				45.6 J			11.8	16.7 J	

All compounds reported in ug/l.
J = Estimated value.
Duplicate concentrations have been reported as an average of the two samples.
*= Concentrations in parentheses are the proposed NJDEPE groundwater cleanup standards which are State To ı Considered criteria (TBCs).
The other ARARs are state or federal maximum contaminant levels.

Table 3, Continued

INDUSTRIAL LATEX RI REPORT
DEEP WELL GROUNDWATER SAMPLES THAT EXCEED ARARs

COMPOUNDS	ARAR (ug/l)*	MW-1C (Round 1)	MW-1C (Round 3)	MW-3C (Round 1)	MW-3C (Round 3)	MW-3B (Round 1)	MW-3B (Round 3)	MW-4C (Round 1)	MW-4C (Round 3)
Benzene	1 (1)	2.2						4.4 J	16.0
Trichloroethene	1 (1)	1.1							3.8
1,2-Dichloro-propane	(1)								1.9
Lead	50 (10)	28.0 J		12.0 J				12.7 J	
Chromium	50 (100)			815		88.5			
Barium	1000 (2000)							1260	

All compounds reported in ug/l.
J = Estimated value.
Duplicate concentrations have been reported as an average of the two samples.
* = Concentrations in parentheses are the proposed NJDEPE groundwater cleanup standards which are State To Be Considered criteria (TBCs). The other ARARs are state or federal maximum contaminant levels.

Table 4 - Summary of Results
Spring 2000 Sampling Events

	Federal MCL ppb	State MCL and/or (State Ground Water Quality Criteria) ppb	Maximum Conc. Detected ppb	Frequency of Detection
VOCs				
Acetone	-	(700)	13	1/23
Chloroform	80	(6)	6	1/23
1,1-DCA	-	50 (70)	25	8/23
cis-1,2-DCE	70	70 (10)	10	7/23
PCE	5	1 (1)	6	5/23
Toluene	1000	1000 (1000)	0.5	3/23
1,1,1-TCA	200	30 (30)	2	3/23
TCE	5	1 (1)	5	9/23
Vinyl Chloride	2	2 (5)	2	3/23
SVOCs				
Acetophenone	-	-	1	1/23
Benzaldehyde	-	-	1	1/23
Caprolactam	-	-	2	2/23
Pesticides/PCBs				
Dieldrin	-	(0.03)	0.0083	2/23
Endrin Aldehyde	-	-	0.011	1/23
Delta-BHC	-	-	0.0061	1/23
Lindane	0.2	0.2 (0.2)	0.0026	1/23
PCBs	0.5	0.5 (0.5)	not detected	0/23

Table 4 - Summary of Results
Spring 2000 Sampling Events

	Federal MCL ppb	State MCL and/or (State Ground Water Quality Criteria) ppb	Maximum Conc. Detected ppb	Frequency of Detection
Metals				
Aluminum	-	(200)	2,080	9/23
Antimony	6	6 (20)	5.8	4/23
Arsenic	50	50 (8)	6.4	7/23
Barium	2000	2000 (2000)	1,240	23/23
Beryllium	4	4 (20)	0.4	4/23
Cadmium	5	5 (4)	4.5	2/23
Calcium	-	-	536,000	23/23
Chromium	100	100 (100)	631	12/23
Cobalt	-	-	55.4	16/23
Copper[1]	1300	1300 (1000)	21.2	2/23
Iron	-	(300)	5,570	13/23
Lead[1]	15	15 (10)	2.5	2/23
Magnesium	-	-	50,500	23/23
Manganese	-	(50)	9,150	23/23
Nickel	-	(100)	906	9/23
Potassium	-	-	11,800	23/23
Selenium	50	50 (50)	2.5	1/23
Silver	-	-	1.2	2/23
Sodium	-	(50000)	93,000	23/23
Vanadium	-	-	5	16/23
Zinc	-	(5000)	152	3/23

[1]These are action levels, not MCLs.

TABLE 5a
OCCURRENCE, DISTRIBUTION AND SELECTION OF CHEMICALS OF POTENTIAL CONCERN
Industrial Latex
Organics

Scenario Timeframe:	Current
Medium:	Ground Water
Exposure Medium:	Ground Water
Exposure Point:	Tap Water

CAS Number	Chemical	Minimum Concentration (1)	Minimum Qualifier	Maximum Concentration (1)	Maximum Qualifier	Units	Location of Maximum Concentration	Detection Frequency	Concentration Used for Screening	Screening Toxicity Value (2)		Potential ARAR/TBC Value	Potential ARAR/TBC Source	COPC Flag	Rationale for Contaminant Deletion or Selection (3)
67641	Acetone	13	J	13	J	ug/l	7b	1/23	13	610	N	N/A	N/A	NO	BSL
67663	Chloroform	6		6		ug/l	8c	1/23	6	0.15	C	80	MCL	NO	NSR
75343	1,1-Dichloroethane	0.6	J	25	E	ug/l	6b	8/23	25	800	N	N/A	N/A	NO	BSL
156592	cis-1,2-Dichloroethene	0.7	J	10		ug/l	4c	7/23	10	61	N	70	MCL	NO	BSL
127184	Tetrachloroethene	0.4	J	6		ug/l	4b	5/23	6	1.1	C	1	NJMCL	NO	NSR
108883	Toluene	0.3	J	0.5	J	ug/l	6b	3/23	0.5	750	N	1000	MCL	NO	BSL
71556	1,1,1-Trichloroethane	0.7	J	2		ug/l	10b	3/23	2	3200	N	200	MCL	NO	BSL
79016	Trichloroethene	0.4	J	5		ug/l	4c	9/23	5	1.6	C	1	NJMCL	NO	NSR
75014	Vinyl Chloride	0.7	J	2		ug/l	4c	3/23	2	0.015	C	2	MCL	NO	NSR
98862	Acetophenone	1	J	1	J	ug/l	3c	1/23	1	0.042	N	N/A	N/A	NO	NSR
100527	Benzaldehyde	1	J	1	J	ug/l	3c	1/23	1	3700	N	N/A	N/A	NO	BSL
105602	Caprolactam	1	J	2	J	ug/l	10a	2/23	2	18000	N	N/A	N/A	NO	BSL
60571	Dieldrin	0.004	J	0.0083	J	ug/l	8a	2/23	0.0083	0.0042	C	N/A	N/A	NO	NSR
	Endrin Aldehyde	0.011	J	0.011	J	ug/l	8a	1/23	0.011	N/A		N/A	N/A	NO	NTX
	Delta-BHC	0.0061	J	0.0061	J	ug/l	9b	1/23	0.0061	N/A		N/A	N/A	NO	NTX
58899	Lindane	0.0026	J	0.0026	J	ug/l	10c	1/23	0.0026	0.052		0.2	MCL	NO	BSL

(1) Minimum/maximum detected concentration.

(2) EPA Region III Risk-Based Concentration Table, May 8, 2001

(3) Rationale Codes:
- No Toxicity Information (NTX)
- Below Screening Level (BSL)
- Not Site Related (NSR)

Definitions:
- N/A = Not Applicable
- COPC = Chemical of Potential Concern
- ARAR/TBC = Applicable or Relevant and Appropriate Requirement/To Be Consider
- MCL = Federal Maximum Contaminant Level
- NJMCL = New Jersey MCL
- J, E = Estimated Value
- C = Carcinogenic
- N = Non-Carcinogenic

TABLE 5b
OCCURRENCE, DISTRIBUTION AND SELECTION OF CHEMICALS OF POTENTIAL CONCERN
Industrial Latex
Inorganics

Scenario Timeframe:	Current
Medium:	Ground Water
Exposure Medium:	Ground Water
Exposure Point:	Tap Water

CAS Number	Chemical	Minimum (1) Concentration	Minimum Qualifier	Maximum (1) Concentration	Maximum Qualifier	Units	Location of Maximum Concentration	Detection Frequency	Concentration Used for Screening	Screening (2) Toxicity Value		Potential ARAR/TBC Value	Potential ARAR/TBC Source	COPC Flag	Rationale for (3) Contaminant Deletion or Selection
7429905	Aluminum	43.7	B	2080	J	ug/l	10a	9/23	2080	37000	N	N/A	N/A	NO	BSL
7440360	Antimony	2.7	B	5.8	B	ug/l	1a	4/23	5.8	15	N	6	MCL	NO	BSL
7440382	Arsenic	1.8	B	6.4	B	ug/l	5b	7/23	6.4	0.045	C	50	MCL	NO	BMCL
7440393	Barium	123	B	1240		ug/l	5b	23/23	1240	2600	N	2000	MCL	NO	BSL
7440417	Beryllium	0.1	B	0.4	B	ug/l	1a	4/23	0.4	73	N	4	MCL	NO	BSL
7440439	Cadmium	1.1	B	4.5	B	ug/l	1a	2/23	4.5	18	N	5	MCL	NO	BSL
	Calcium	58,200		536000		ug/l	1a	23/23	536000	N/A		N/A	N/A	NO	NTX
1.8E+007	Chromium	8.9	B	631		ug/l	3c	12/23	631	55000	N	100	MCL	NO	BSL
7440484	Cobalt	0.79	B	55.4		ug/l	1a	16/23	55.4	730	N	N/A	N/A	NO	BSL
7440508	Copper	16.2	B	21.2	B	ug/l	9b	2/23	21.2	1500	N	1300	MCL	NO	BSL
7439896	Iron	380		5570	J	ug/l	9c	13/23	5570	11000	N	N/A	N/A	NO	BSL
	Lead	2.3	B	2.5	BJ	ug/l	10b	2/23	2.5	N/A		15	MCL	NO	BSL
	Magnesium	8700		50500		ug/l	1a	23/23	50500	N/A		N/A	N/A	NO	NTX
7439965	Manganese	2.2	B	9150		ug/l	1a	23/23	9150	5100	N	N/A	N/A	NO	NSR
7440020	Nickel	27.1	B	908		ug/l	3c	9/23	908	730	N	N/A	N/A	NO	NSR
	Potassium	676	B	11800	J	ug/l	1a	23/23	11800	N/A		N/A	N/A	NO	NTX
7782492	Selenium	2.5	B	2.5	B	ug/l	1b	1/23	2.5	180	N	50	MCL	NO	BSL
7440224	Silver	0.79	B	1.2	B	ug/l	10a	2/23	1.2	180	N	N/A	N/A	NO	BSL
	Sodium	8780		93000		ug/l	1a	23/23	93000	N/A		N/A	N/A	NO	NTX
7440622	Vanadium	0.51	B	5	B	ug/l	10a	16/23	5	260	N	N/A	N/A	NO	BSL
7440666	Zinc	45.2	J	152		ug/l	1a	3/23	152	11000	N	N/A	N/A	NO	BSL

(1) Minimum/maximum detected concentration.

(2) EPA Region III Risk-Based Concentration Table, May 8, 2001

(3) *Rationale Codes:* *No Toxicity Information (NTX)*
Below Screening Level (BSL)
Not Site Related (NSR)
Below MCL (BMCL)

Definitions: N/A = Not Applicable
COPC = Chemical of Potential Concern
ARAR/TBC = Applicable or Relevent and Appropriate Requirement/To Be Consider
MCL = Federal Maximum Contaminant Level
C = Carcinogenic
N = Non-Carcinogenic
J = Estimated Value
B = Value between Instrument Detection Limit and Control Detection Limit

APPENDIX III

ADMINISTRATIVE RECORD INDEX

INDUSTRIAL LATEX SITE
OPERABLE UNIT 2
ADMINISTRATIVE RECORD FILE
INDEX OF DOCUMENTS

3.0 REMEDIAL INVESTIGATION

3.4 Remedial Investigation Reports

P. 300001-300113 Report: Revised Draft, Industrial Latex, Area Groundwater Evaluation, Industrial Latex Site, Borough of Wallington, Bergen County, NJ, prepared by CDM Federal Programs Corporation, prepared for U.S. EPA, Region II, April 4, 1995.

P. 300114-300423 Report: Ground Water Remedial Investigation, Industrial Latex Superfund Site, Wallington, New Jersey, prepared by U.S. EPA, Region II, Emergency and Remedial Response Division, New Jersey Remediation Branch, July 2001.

10.0 PUBLIC PARTICIPATION

10.9 Proposed Plan

P. 10.0001-10.0004 Plan: Superfund Proposed Plan, Industrial Latex Superfund Site, Wallington, Bergen County, New Jersey, prepared by U.S. EPA, Region II, August 2001.

INDUSTRIAL LATEX SITE
OPERABLE UNIT 1
ADMINISTRATIVE RECORD FILE UPDATE
INDEX OF DOCUMENTS

5.0 RECORD OF DECISION

5.3 Explanations of Significant Differences

P. 500001-500007 Explanation of Significant Differences, Industrial Latex, Wallington, Bergen County, New Jersey, April 26, 1996.

APPENDIX IV

STATE LETTER OF CONCURRENCE

State of New Jersey

DONALD T. DIFRANCESCO
Acting Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

SEP 2 8 2001

Mr. William Muszynski, P. E.
Acting Regional Administrator
USEPA - Region II
290 Broadway
New York, NY 10007 - 1866

Dear Mr. Muszynski:

The Department of Environmental Protection (DEP) has evaluated and concurs with the selected remedy for the second of two operable units for the Industrial Latex Superfund site.

The remedy as stated in the Declaration Statement of the Record of Decision is "...that no site-related contaminants are present at elevated levels in the ground water and, therefore, no action is warranted because the site poses no unacceptable risk to human health or the environment".

The State of New Jersey appreciates the opportunity to participate in the decision making process and looks forward to future cooperation with the USEPA.

Sincerely,

Robert C. Shinn, Jr.
Commissioner

APPENDIX V

RESPONSIVENESS SUMMARY

RESPONSIVENESS SUMMARY
FOR THE
INDUSTRIAL LATEX SITE
WALLINGTON
BERGEN COUNTY, NEW JERSEY

I. INTRODUCTION

This Responsiveness Summary provides a summary of public comments and concerns and the U.S. Environmental Protection Agency's (EPA's) responses to those comments regarding the Proposed Plan to address ground water at the Industrial Latex site. EPA has selected a no action remedy for the ground water after reviewing and considering all public comments received during the public comment period.

EPA held a public comment period from August 3, 2001 through September 3, 2001 to provide interested parties with the opportunity to comment on the Proposed Plan.

EPA held a public information meeting to present and discuss EPA's preferred no action alternative for the ground water at the site. The meeting was held at the Wallington Council Chambers located at 54 Union Boulevard, Wallington, New Jersey on August 15, 2001 at 7:00 p.m.

In general, the community responded positively to EPA's Proposed Plan.

The rest of this Responsiveness Summary is organized as follows:

COMPREHENSIVE SUMMARY OF MAJOR QUESTIONS, COMMENTS, CONCERNS, AND RESPONSES: This section summarizes oral comments raised at the public meeting and EPA's responses. No written comments were submitted during the public comment period.

Appendices: There are three appendices attached to this Responsiveness Summary. They are as follows:

Appendix A: This appendix contains the Proposed Plan that was distributed to the public for review and comment;

Appendix B: This appendix contains the public notice which appeared in The Bergen Record; and

Appendix C: This appendix contains the public meeting transcript.

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

This section summarizes oral comments raised at the public meeting and EPA's responses. No written comments were received during the comment period. The comments and corresponding responses are presented in the following categories:

1.0 Ground Water Remedial Investigation
2.0 EPA's Proposed Plan
3.0 Soil Cleanup
4.0 General Health Concerns

1.0 Ground Water Remedial Investigation

1.1 Comment: An interested citizen asked whether contamination would remain on the site and, if not, which direction it would go.

Response: All known contamination sources (e.g., buildings, vats, buried drums, and soil) were cleaned up by EPA through earlier remedial actions. No contamination related to the Industrial Latex site is present in the ground water. Ground water flows generally northward in the area, in the opposite direction of the adjacent recreational field. It is possible that, in the past, the site contributed somewhat to the area's general ground water contamination. However, the primary contaminants of concern at Industrial Latex were polychlorinated biphenyls, or PCBs, which bind strongly to soil and do not dissolve in water. Therefore, it is unlikely that PCBs have entered the ground water, and this is consistent with our investigation, which did not find PCBs in the ground water at any level of concern.

1.2 Comment: A citizen asked how EPA determined that ground water flows northward.

Response: By installing a series of monitoring wells and measuring ground water elevations, one can determine the direction the ground water is flowing at each well, and thus, the overall ground water flow pathways.

1.3 Comment: A concerned citizen asked if a survey of other industries in the area was conducted.

Response: Yes, EPA looked at information that is available about other industries in the area, at what the New Jersey Department of Environmental Protection (NJDEP) has done or is doing in the area, and what other parties may be doing to address ground water

contamination in the area. EPA found that the presence of contamination in the ground water appears to be common in the area and may not be attributable to any one source. The levels of contamination at Industrial Latex are generally consistent with background conditions in the area. This information is presented in the Remedial Investigation report which is available at the John F. Kennedy Memorial Library, 92 Hathaway Street, Wallington, New Jersey; the Wood-Ridge Memorial Library, 231 Hackensack Street, Wood-Ridge, New Jersey; and at EPA's regional offices at 290 Broadway, New York, New York.

1.4 Comment: An interested citizen asked whether any contamination found in the ground water will dissipate, or disappear, over time.

Response: No site-related contamination was found in the ground water. The low levels of contamination that were found in the ground-water are likely moving with the ground water and not remaining at the site. Also, these low levels of contamination found are typical of an area containing many potential sources.

1.5 Comment: An interested citizen asked how the Industrial Latex site was originally discovered.

Response: Reports were made to local officials by residents who were concerned with the appearance of the site. NJDEP inspected the site and noted that environmental problems were clearly present. EPA became involved shortly thereafter.

2.0 EPA's Proposed Plan

2.1 Comment: A citizen asked if the no action remedy means that, as far as EPA is concerned, the site poses no danger to human beings if the property is developed.

Response: That is correct. The soil has been cleaned up to allow for unrestricted use and no site-related contamination has been found to be present in the ground water. However, because ground water in the area has been found to contain sporadic contamination that appears to be regional in nature, EPA recommends that the ground water not be used for potable water supply purposes without appropriate treatment.

2.2 Comment: A citizen asked if the contamination in the ground water could become airborne.

Response: At this site, ground water refers to water approximately 15 feet below the ground surface. The levels of contamination found in the ground water were generally very low. Therefore, any contamination in the water is not going to reach the air. In addition, a public water company supplies water to residents in the area and private wells are not used. There is no exposure pathway to the ground water.

2.3 Comment: The Mayor of Wallington asked whether the no action remedy will affect the residential cleanup standard used to address the site soils. In other words, he asked if the site would still be suitable for residential use.

Response: The no action remedy will have no impact on the completed soil cleanup. The site is suitable for unrestricted uses, including residential development. However, because ground water in the area has been found to contain sporadic contamination that appears to be regional in nature, EPA recommends that the ground water not be used for potable water supply purposes without appropriate treatment.

2.4 Comment: A citizen asked if in-ground pools would reach the ground water and thus be affected by any contamination.

Response: In-ground pools do not go deeply enough to be affected.

2.5 Comment: A citizen asked whether the site would be monitored in the future.

Response: EPA plans to perform no future monitoring. However, NJDEP has indicated that it intends to monitor the ground water in the area for the low-level VOCs that were detected on-site.

3.0 Soil Cleanup

3.1 Comment: The Mayor of Wallington asked whether it was correct that the site soils were cleaned up to a residential standard.

Response: The site was cleaned up to a level that allows for unrestricted use, including residential development.

3.2 Comment: A citizen asked if any contamination remained in the site soil that was not addressed during the soil cleanup.

Response: All known soil contamination was cleaned up to allow for unrestricted use of the property.

4.0 General Health Concerns

4.1 Comment: A concerned citizen asked what danger PCBs pose to humans.

Response: Long-term exposure (i.e., a period of 30 or more years) to PCBs is suspected to cause cancer, while short-term exposure directly to high concentrations of PCBs could cause skin irritation and liver damage. However, PCBs were not found to be present in the ground water, and PCBs in the soil were cleaned up by EPA under earlier remedial actions.

4.2 Comment: A citizen asked whether there was an increased cancer rate among residents of the area.

Response: Comprehensive studies of that sort are difficult to conduct. However, a limited study was performed in 1989 by the New Jersey Department of Health. The study did not find any higher prevalence of cancer in the area.

4.3 Comment: The mayor asked EPA to explain what testing was performed on the field adjacent to the site. This field was developed by the Borough of Wallington for recreational use.

Response: EPA performed a series of investigations at the field. During the original investigation at the Industrial Latex site in the early 1990s, EPA took four surface soil samples and approximately seven soil samples from a depth of about ten feet. This testing did not reveal the presence of any site-related contamination on the field and found other constituents, including metals and polycyclic aromatic hydrocarbons (PAHs), to be present at levels typical for this area of New Jersey. Metals and PAHs are found in soils in this area because metals are a natural component of soil and PAHs are associated with the historical use of coal in highly populated, industrial areas. In 1995, EPA performed some additional sampling at the field that confirmed the earlier results. Finally, sampling of the sides and bottom of the excavation areas during the recent soil cleanup indicated that the contamination did not extend to the field.

Industrial Latex Site
Responsiveness Summary
Operable Unit 2

APPENDIX A
PROPOSED PLAN DATED AUGUST 2001

Industrial Latex Superfund Site

Wallington, Bergen County, New Jersey

August 2001

EPA ANNOUNCES PROPOSED PLAN

This Proposed Plan identifies the preferred No Action remedy being considered to address ground water at the Industrial Latex site. This Proposed Plan is issued by the United States Environmental Protection Agency (EPA) as the lead agency, with support from the New Jersey Department of Environmental Protection (NJDEP).

The No Action remedy described here is the preferred remedy for Operable Unit 2 (OU2), which addresses ground water at the Industrial Latex site. Changes to this preferred remedy may be made if public comments or additional data indicate that such a change will result in a more appropriate remedy. The final decision regarding the selected remedy will be made after EPA has taken into consideration all public comments received during the public comment period.

EPA is issuing this Proposed Plan as part of its community relations program under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund). This Proposed Plan summarizes information that can be found in greater detail in the Final Expanded Site Inspection (ESI) Report (January 1988), the Final Remedial Investigation Report (June 1992), the Area Ground Water Study Report (April 1995), and the Ground Water Remedial Investigation Report (June 2001), as well as other site-related documents. .

EPA relies on public input to ensure that the concerns of the community are considered in selecting an effective remedy for each Superfund site. EPA will select a final remedy for OU2 only after the public comment period has ended and the information submitted during this period has been reviewed and considered. A responsiveness summary addressing the public comments will be issued as part of the Record of Decision (ROD), the document which formalizes the selection of the remedy.

Dates to remember:
MARK YOUR CALENDER

Public Comment Period:
August 3, 2001 - September 3, 2001
EPA will accept written comments on the Proposed Plan during the public comment period.

Public Meeting:
August 15, 2001
EPA will hold a public meeting to explain the Proposed Plan. Oral and written comments will also be accepted at the meeting. The meeting will be held at the Wallington Council Chambers, 54 Union Boulevard, Wallington, New Jersey at 7:00 p.m. Prior to the start of the meeting, EPA will be available from 6:00 p.m. to 7:00 p.m. to informally answer questions.

For further information, see the Administrative Record at the following locations:

John F. Kennedy Memorial Library
92 Hathaway Street
Wallington, New Jersey
(973) 471-1692
Hours: Monday and Tuesday - 10:00 a.m. to 6:00 p.m.; Wednesday - 4:00 p.m. to 8:00 p.m.
Thursday - noon to 8:00 p.m.
Friday - 10:00 a.m. to 5:00 p.m.

Wood-Ridge Memorial Library
231 Hackensack Street
Wood-Ridge, New Jersey 07075
(201) 438-2455
Hours: Monday to Thursday - 10:00 a.m. to 9:00 p.m.
Friday - 10:00 a.m. to 7:00 p.m.

U.S. EPA Records Center, Region II
290 Broadway, 18th Floor
New York, New York 10007-1866
(212) 637-3261
Hours: Monday to Friday - 9:00 a.m. to 5:00 p.m.

SITE HISTORY

The Industrial Latex site is located at 350 Mount Pleasant Avenue in Wallington, Bergen County, New Jersey. The 9.67-acre site is located in a mixed residential/industrial area. An elementary school is located directly across the street. An outdoor recreation field forms the southern border of the site and an active railway forms the eastern border. Directly across the railroad tracks is the Borough of Wood-Ridge, New Jersey. Approximately 11,600 people live in Wallington and approximately 7,600 people live in Wood-Ridge.

The Industrial Latex Corporation manufactured natural and synthetic rubber compounds, and chemical adhesives from 1951 to 1983. The company used solvents in the manufacturing process and introduced polychlorinated biphenyls (PCBs) as a fire retardant. Poor operational procedures and on-site waste dumping resulted in widespread surface and subsurface soil contamination. When operations ceased in 1983, about 1,600 open or leaking drums remained on the property.

In 1986, EPA removed and disposed of open drums, liquids, and other immediate threats. The site was proposed for inclusion on the National Priorities List of Superfund Sites in May 1988 and finalized in March 1989. EPA then initiated a Remedial Investigation and Feasibility Study (RI/FS) to determine the nature and extent of contamination at the Industrial Latex site, and to develop and evaluate alternatives to address the contamination.

Based on the RI/FS and after receiving public input, EPA issued a ROD in September 1992, which outlined the cleanup plan for the site. The plan included:

(1) Excavation of contaminated soil and on-site treatment by low temperature thermal desorption, followed by backfilling on the site;

(2) excavation and off-site disposal of buried drums;

(3) dismantling and off-site disposal of vats; and

(4) demolition and off-site disposal of two buildings on the site.

On April 10, 1996, EPA issued an Explanation of Significant Differences changing or eliminating a number of remediation goals specified in the ROD. These changes were based on sampling conducted after the ROD was signed. Specifically, remediation goals for beryllium, lead, heptachlor epoxide, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(ghi)perylene, chrysene, and indeno(1,2,3-cd)perylene were eliminated because these contaminants were not related to activities at the site and, further, were present at concentrations consistent with background levels. In addition, the remediation goal for arsenic was changed to be consistent with New Jersey background concentrations. The four remaining site-related contaminants of concern at the Industrial Latex site were PCBs, bis(2-ethylhexyl)phthalate, 3,3'-dichlorobenzidine, and arsenic.

Because the results of the ground water investigation were inconclusive, the 1992 ROD called for a subsequent investigation.

Remedial Actions Implemented to Date

Thus far, the cleanup of the site has involved two phases. The first phase, involving the demolition of the buildings and removal of the vats, started in July 1995 and was completed in November 1995. Field work for the second phase, addressing the soil and buried drums, began in December 1998 and was completed in August 2000.

During the soil remediation, approximately 53,600 cubic yards of material were excavated, treated on-site via low temperature thermal desorption, and then backfilled on the site. The site has been cleaned up to an unrestricted, residential use standard. Thus, all potential sources of ground water contamination have been removed from the site.

SITE CHARACTERISTICS

Ground water is present in both the unconsolidated and consolidated subsurface material at the Industrial Latex site. The Brunswick bedrock aquifer is the primary water-bearing unit in the area. The depth to water at the site ranges from 10 feet below ground surface in the eastern portion to approximately 20 feet below ground surface in the western portion of the site. The difference in depth to ground water corresponds to the change in topography between the eastern and western portions of the site.

Results of Previous Ground Water Investigations

Investigation of the site ground water has been ongoing since the 1980s. Eleven monitoring wells were installed as part of the ESI performed at the site in 1987. As part of the 1992 RI/FS, an additional five wells were installed at specific locations throughout the site to supplement the existing monitoring well network.

During the 1992 RI/FS, water from the 16 on-site wells was sampled for volatile and semi-volatile organic compounds (VOCs and SVOCs), pesticides, PCBs, and metals. The investigation found that low concentrations of VOCs, PCBs, bis(2-ethylhexyl)phthalate, and metals were present in the ground water, however, the results from two rounds of sampling were not consistent. While PCBs were detected during both sampling rounds, the results ranged from 50 parts per billion (ppb) to 0.18 ppb in the same well. In addition, the data generated was not sufficient to determine whether the low concentrations of VOCs and metals found in the ground water were the result of activities at the site or migration from off-site sources.

Therefore, in 1995, EPA initiated another ground water study. The purpose of that study was twofold. The first involved a comparison of the contaminants found in the potential on-site sources of ground water contamination at Industrial Latex to the contaminants found in the ground water. The potential on-site sources included drums, underground storage tanks, a septic system, and the soil. The second purpose of the study was to identify ground water contamination associated with other facilities in the area of Industrial Latex and compare this with the contamination found at Industrial Latex.

The Area Ground Water Evaluation Report showed that many of the contaminants found in the ground water at Industrial Latex were not present in any of the potential Industrial Latex site sources. The report also showed that the presence of contamination in the ground water appears to be common in the area and may not be attributable to any one source. The levels of contamination at Industrial Latex are generally consistent with background conditions in the area.

Results of Current Investigation

In Spring 2000, EPA conducted a final ground water sampling effort at the site to clarify its understanding of the site ground water. In addition to 14 of the original wells sampled during the 1992 RI, EPA sampled seven new wells installed to more accurately detect any potential contamination. Again, water from these wells was tested for VOCs, SVOCs, pesticides, PCBs, and metals.

Low levels of VOCs and metals were detected in the wells. However, of the four site-related chemicals of concern at Industrial Latex, only arsenic was found to be present in the ground water, and at concentrations below federal and state drinking water standards. The concentration of arsenic was measured at a maximum of 6.4 ppb, compared to the drinking water standard of 50 ppb and the New Jersey ground water quality standard of 8 ppb.

SCOPE AND ROLE OF ACTION

This is the second of two operable units, or phases, at the site. OU1 addressed contaminated soil, vats, drums, and buildings at the site. All known site sources were removed during the OU1 cleanup activities.

This Proposed Plan addresses OU2, the ground water at the Industrial Latex site. Based on the results of the additional ground water investigations and evaluation performed as part of OU2, a No Action remedy is being proposed for the ground

water at the site. No further activities are planned for the site. However, NJDEP has indicated that they will continue to monitor the ground water in the area for the low level VOCs that were detected on-site.

SUMMARY OF SITE RISKS

The contaminants of concern during the soil cleanup at the Industrial Latex site were PCBs, bis(2-ethylhexyl)phthalate, 3,3'-dichlorobenzidine, and arsenic. All site-related contamination that could have been a potential source of ground water contamination has been removed. During the most recent ground water sampling events, no site-related contaminants of concern (i.e., PCBs, bis(2-ethylhexyl)phthalate, 3,3'-dichlorobenzidine, and arsenic) were present at levels above New Jersey or federal drinking water standards. Therefore, no remedial action is warranted for the ground water at the site, and the site poses no unacceptable risk to human health or the environment.

To further confirm this finding, a toxicity screening was also performed with regard to all chemicals detected in the ground water at the Industrial Latex site. The toxicity screening does not indicate the need to perform a baseline risk assessment. Most chemicals detected in the ground water were either found at concentrations below screening levels or do not have toxicity information. Arsenic was detected at concentrations above its screening level, but below levels at which EPA would take action. The remaining chemicals detected in the ground water were not site related. Again, the toxicity screening confirms that no remedial action is warranted and that the site poses no unacceptable risk to human health or the environment.

STATE/SUPPORT AGENCY ACCEPTANCE

The State of New Jersey agrees with the preferred remedy described in this Proposed Plan.

COMMUNITY PARTICIPATION

EPA and NJDEP provide information regarding the cleanup of the Industrial Latex site to the public through public meetings, the Administrative Record file for the site, and announcements published in the local newspaper. EPA and the State encourage the public to gain a more comprehensive understanding of the site and the Superfund activities that have been conducted at the site.

The dates for the public comment period , the date, location, and time of the public meeting, and the locations of the Administrative Record files, are provided on the front page of this Proposed Plan.

For further information on the Industrial Latex site, please contact:

Stephanie Vaughn Remedial Project Manager (212) 637-3914	Natalie Loney Community Relations Coordinator (212)637-3639

U.S. EPA
290 Broadway
New York, New York 10007-1866

Industrial Latex Site
Responsiveness Summary
Operable Unit 2

APPENDIX B
PUBLIC NOTICES

EPA invites you to attend a Public Meeting to discuss the proposed plan for the Industrial Latex Superfund Site

The U.S. Environmental Protection Agency (EPA) has completed its investigation of the ground water at the industrial Latex Superfund site in Wallington, New Jersey. The purpose of the investigation was to determine if the site posses an unacceptable risk to human health or the environment.

Based on the investigation, EPA did not identify an unacceptable risk and is proposing that no action be taken. EPA will present its findings and the basis for the proposed No Action remedy at a public meeting on:

Wednesday, August 15, 2001
7:00 PM
Wallington Council Chambers
54 Union Boulevard
Wallington, New Jersey

Prior to the start of the meeting, representatives of EPA will be available from 6:00 p.m. to 7:00 p.m. to informally answer questions.

Before selecting a final remedy, EPA will consider written and oral comments on the proposed No Action Remedy. The thirty-day comment period for the proposed plan begins on **August 3, 2001 and ends on September 3, 2001**. Interested parties are invited to submit written comments to EPA, oral comments will be taken at the public meeting on August 15, 2001. **All written comments must be received on or before September 3, 2001.** The final decision document will include a summary of public comments and EPA responses.

Copies of the remedial investigation report, Proposed Plan and other site-related documents have been placed in the following record centers:

John F. Kennedy Memorial Library
92 Hathaway Street
Wallington, New Jersey

Wood-Ridge Memorial Library
231 Hackensack Street
Wood-Ridge, New Jersey

Written comments on the proposed No Action remedy should be sent to:

Stephanie Vaughn, Remedial Project Manager
U.S. Environmental Protection Agency
290 Broadway
New York, New York 10007-1866

For more information,
U.S. EPA Community
(212) 637-3639 or toll-free at

Contact Natalie Loney,
Involvement Coordinator at
1-800-346-5009

CORRECTED + RELEASED B.H.

Industrial Latex Site
Responsiveness Summary
Operable Unit 2

APPENDIX C
PUBLIC MEETING TRANSCRIPT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter :

of :

INDUSTRIAL LATEX SUPERFUND SITE :

Wallington Council Chambers
54 Union Boulevard
Wallington, New Jersey

August 15, 2001
7:00 o'clock p.m.

FINK & CARNEY
REPORTING AND VIDEO SERVICES
39 West 37th Street, 6th Floor, New York, N.Y. 10018 (212) 869-1500

APPEARING FOR THE U.S. EPA

STEPHANIE M. VAUGHN,
Remedial Project Manager

ROBERT J. McNIGHT,
Chief, NNJRS

ANDY CROSSLAND,
Geologist

NATALIE LONEY,
Community Involvement Coordinator

Tina DeRosa,
Reporter

MAYOR WARGACKI: Good evening everybody. I would like to introduce you to the people from the EPA and the one I know the most and had the most questions of during the cleanup site is Stephanie M. Vaughn. She was the project engineer on the cleanup site.

It was a site cited 15 years ago and I want to thank you for all the work that you have done and the Federal Government has done to clean this site up to residential standards.

I understand this meeting is to give an overview on the cleanup and also to address the ground water remediation or non remediation, whatever you decide to do.

We have Natalie Loney here and we have Bob MCKnight and Andy Crossland from the EPA. Natalie is going to start and Stephanie will give an overview and if anybody has any questions they would be happen to answer them.

MS. LONEY: Thank you for coming. Before I get started I want to make sure that all of you took advantage of the information we have on the table outside. We have a copy of the proposed plan and a copy of some facts we wrote up on the site which kind of gives a general hopefully easy to read and understand some of the work we are doing.

Before Stephanie starts with her presentation I just wanted to give you kind of a brief overview of why we are here and what stage we are in in terms of the cleanup of the Latex Superfund site.

Generally when the EPA is dealing with a Superfund site there are several milestones that we come up to and we are nearing the end of those milestones. Initially when a site is listed on the NPL, which is the national priority list which is the a list of all the Superfund sites in the

country, there are certain steps that are taken in that. We go through the remedial investigation and feasibility study stage where we actually go out to the site and do an investigation of how much contamination is there, what is the nature of the contamination, what is the extent of the contamination.

Then we do a feasibility study of what is the best way to approach cleaning up this particular site based on the information that we have collected. We have already done that at Industrial Lake.

From there we go to something called the Proposed Remedial Action Plan. I know the Federal Government likes to use a lot of acronyms. The Proposed Remedial Action Plan is the document that we have outside and it pretty much lists what the EPA has determined to be the preferred remedy for addressing contamination at the

site.

When we come up with a proposed plan we make it public. There is an comment period. Some of you may have received copies of the proposed plan in the mail. There are also copies of it in the local libraries and there is a copy of it in our offices in New York City.

You can get a copy of the proposed plan. You can look at it and review it. We then have a public meeting where the EPA presents again our proposed plan. You can make comments to us verbally tonight.

We have a stenographer here who will be recording all of the comments and all of the questions that will be coming in and you also have an opportunity to submit to us written comments. The comment period for this particular site opened on August 3rd and it closes on September 3rd, so you have 30 days in which to submit

comments to us.

Once all of those comments come in we compile them and respond to all of them in a document called the Responsiveness Summary. That Responsiveness Summary is part of a larger document called the Record of Decision. The Record of Decision is what the EPA has come up with. It is the decision that we have made in terms of how we are going to address contamination at the site.

Right now we are presenting to you what we believe to be the preferred remedy for addressing contamination at the site. Following the closing of the comment period we will then have a document, the Record of Decision that is the final decision on EPA and how we are going to address contamination.

I am going to turn over the program to Stephanie and she is going to talk to you about the history of

the site and a lot of technical information we have been discussing a little bit prior to this meeting.

Thank you for your attention. Thank you for time. Before you leave please make sure you sign the list outside and you will be added to our mailing list so if there is any other information you will receive it in the mail. Thank you very much.

MS. VAUGHN: Thank you Natalie and thank you Mayor and the other borough officials that during this clean up they helped move things along.

I will be brief in the site history since many have you have already heard this probably. If you have any questions I will be happy to elaborate.

The Industrial Latex Site operated from 1951 to 1984 as a latex manufacturing facility. At some point during the operations they started

using PCB's or poll Polychlorinated Biphenyls, a fire retardant. PCB's are an oily substance which was commonly used at the time. The company had poor waste disposal practices and in the 1980s the site was basically discovered and it was found with hundreds of leaking vats of chemicals and so in 1987, I believe around there, the EPA came in and did what we call a Remove Action.

That means we came and removed the leaking vats of chemicals and the drums and fenced in the site so we could restrict access so that people couldn't get in. At that point we began investigation. The purpose of the investigation is to determine the nature and extent of contamination, meaning what is out there, what kind of contamination it is and also where it is, how far it goes, if it covers the whole site, if it goes off site.

That investigation was

completed in 1992 at which point we issued a Record of Decision. That Record of Decision addressed the soil and remaining buried drums at the site and it called for four things basically. The removal of two buildings on the site. It called for the demolition and removal of those buildings. The removal of vats from the site. The cleanup of the contaminated soil. The low temperature thermal desorption which is basically a thermal desorption which is basically a process that used heat to remove the contamination from the soil and it also called for the removal of the buried drums.

We divided that part of the cleanup, the soil and buildings into two phases. The first phase of the cleanup addressed the buildings and the vats and that was completed in 1995 and that was a relatively small operation. Then more recently in 1998

we began mobilization for the final phase of the soil cleanup which many of you probably saw.

That is when we brought the large unit down to the site and basically our operations consisted of excavating contaminated soil, running it through the treatment system. The clean soil came out on one end and then the contaminants went through another series of processes where they were basically compressed into a sludge like substance.

The remaining wastes were then sent off site for disposal and the clean soil was tested to make sure it was clean and backfilled on to the site. That operation was completed in June. Well, the soil treatment was completed in June of 2,000, about a year ago now, a little over a year ago at which point we dismantled the units and began site restoration and site restoration was basically completed in

August of 2,000.

The only remaining issue at the site that was not addressed in the 1992 decision was the groundwater and that is the purpose that is we are here tonight for to discuss the EPA's proposed no action decision for the groundwater.

So just let me back up and go through the studies that we have done on the groundwater. Back in 1998 when we started visiting the site we installed seven wells and monitored those wells for contamination and found low levels of various PAH's in it.

Then in 1992 during the Remedial Investigation Report that came out in 1992 we placed another, I think, five wells and did more monitoring. At that point we had a lot of data, but it was not clear. It was not clear whether the groundwater contamination we were seeing, whether

it was site related or whether it was from some other source. We felt we wanted more information so we delayed on making a decision on the groundwater and decided to do the further investigation.

In 1995 we came out with a report which was a general evaluation of the area groundwater. We looked at the surrounding facilities in the area. There are a lot of industrial facilities that are in the proximity of this site. We looked at the type of contaminants that were used at those facilities and the groundwater at those facilities and we also looked at the type of contaminants that were used on Industrial Latex and kind of compared all of this to what we were seeing in the groundwater and what we were seeing is that the while there maybe some groundwater contamination it was not related to Industrial Latex.

The source of the groundwater contamination was not Industrial Latex. Then most recently in 2,000 last year we installed five additional wells. There is also some concern that maybe we were missing some of this contamination, that we weren't seeing it in the wells so we installed five additional wells and monitored those and took samples from those and really that is the final basis for our proposed plan.

Of the four contaminants we were looking for primarily it was PCB's. The other three contaminants that were there were arsenic, bis(2-ethylhexyl)phthalate and 33-Dichlorobazidine. When we sampled the groundwater for those four contaminants we did not find PCB's in the groundwater and we did not find the other two.

We did find low levels arsenic, but we found those at levels

below drinking water standards and below levels of health concern. So, therefore, there is no evidence that there is site related contamination at Industrial Latex and that is the basis of our recommendation.

Probably at this point instead of me going into lots of detail it would be best if we opened it up to questions.

Let me just say thanks and introduce Andy Crossland. He is the hydrogeologist for the site. This is Bob McKnight. He is the head of the Northern New Jersey mediation and this is Natalie Loney.

MR. McKNIGHT: If you could state your name for the record.

MS. DETOREI: Jan Detorei. I have two questions that are related. I wanted to know how the site was discovered, originally discovered and did the contamination from the site remain on site or not and which

direction did that go. I am not sure who should answer those questions.

MS. VAUGHN: The site was basically, I am not clear on every detail, but it was basically discovered by the New Jersey Department of Environmental Protection.

MS. DETOREI: Just because of a internal investigation?

MS. VAUGHN: I think there were some reports from locals who were concerned. They saw the site and it just did not look right and they called up the EPA and at that point the DEP came to investigate and saw there was indeed a problem and the EPA became involved shortly thereafter.

As far as the second question, the direction if groundwater contamination could be moving off site and what direction it would go, the direction of groundwater flow is in general in the area is north, away

from the recreational fields, in the opposite direction of that.

Is it possible that something from the site got into the groundwater and is moving. Yes, it is possible. The reason is the primary contaminant at the site is PCB's and the reason we feel pretty confident that that is not a problem in the groundwater is that the nature of that contaminant. It binds very strongly to soil and it does not like water and it does not dissolve in water so it is not -- it would not move into the water. It is just not how it works. It does not dissolve.

MS. DETORIE: But as far as the other contaminants generally it s going to go north.

MR. PETRICKO: It couldn't go airborne, could it?

MS. VAUGHN: That is something else I should go into. When we say groundwater in this case that is water

at least 15 feet below the ground surface. So there is a lot of ground above this so it is not going to get into the air and has no exposure pathway.

The town, all the residents are supplied by public water so there are not any private wells with people using this water. Without that there is no way of getting into contact with this water or ingesting this water.

MR. McKNIGHT: And the levels that were found were generally very low.

MR. PETRICKO: How do you know it goes north?

MR. CROSSLAND: By putting in a series of wells you are able to find out what direction the water is flowing and from that you can determine what the pathways are.

MR. PETRICKO: So it is heading towards Curtis, right?

MR. HARTMAN: Does the no

action remedy mean in effect simply that as far as the EPA is concerned there is no danger to human beings with the development of that property?

MR. McKNIGHT: That is correct.

MS. DETORIE: If there was danger to humans what is the danger, is there a health risk. What do PCP's cause.

MS. VAUGHN: Long term exposure to PCB's do cause cancer. When I say long term exposure when we conduct a risk assessment that assumes a 30 year exposure, but as far as the groundwater the PCB's were not found.

MR. McKNIGHT: The treatment of the PCB's was a real threat that is gone.

MS. DETROIE: Is there any statistics as far as an increased cancer rate for residents of the area or hasn't it been studied or is it too short of a time.

MS. VAUGHN: First off those kinds of studies are a lot more difficult to do than people think for several reasons. It is hard to figure out where people are born, they use different hospitals. There are lots of reasons it is very difficult to do those studies, but a study was done, a limited study was done, I should say, and it did not indicate any higher prevalence of cancer in the area.

MAYOR WARGACKI: Stephanie, one question that I have is the present 10 acre site was cleaned up and you didn't say this but to residential standards, right?

MS. VAUGHN: Yes.

MAYOR WARGACKI: Initially it was an industrial site and the EPA wanted it cleaned up to industrial standards and we fought very hard and made it a residential cleanup because we felt it was adjacent to an elementary school and homes on other

side of the track and I think you did a good job in doing that. The question Mr. Hartman alluded to, is the groundwater at this point going to affect the residential cleanup standard or is it so minute that is why you are saying no further action is necessary?

MS. VAUGHN: We are saying no further action is necessary for two reasons. First because of the site no further action is necessary because we did not find any site related contamination. But as far as your concern goes there is no exposure because there are no people in the area that use this water for their drinking water.

MR. McKNIGHT: It is supplied by a private company. So it has to be treated to drinking water standards. Even if they were pulling water that had contamination in it they would be treating it before they supplied it to

you.

It would be the same if the property were developed and homes were put out there, they would run water supply pipes in.

MS. DETORIE: Underground swimming pools, they don't go that deep?

MS. VAUGHN: No.

MR. McKNIGHT: The levels are very low. They are probably typical of what you will find throughout the entire area, not just the immediate area around the site. If you travel a mile in that direction or a mile in that direction you are going to find it very, very similar to what you find out here.

MR. PETRICKO: If you found any contaminants, which kind of says there is an opening that could be something else, is there any other chance there is other contaminants in the ground from anywhere else?

MR. McKNIGHT: No.

MR. McKNIGHT: No. This thermal process addressed all of that. As far as the groundwater yes, we did find contaminants.

MR. PETRICKO: When you say site related contaminants, that means only Latex. Is there a possibility that there were other contaminants that weren't represented.

MS. VAUGHN: The soil was cleaned up to residential.

MR. McKNIGHT: If it there were TCE's it would have been treated through that process.

MAYOR WARGACKI: The other concern the residents have is that we built a football, baseball, socer field adjacent to the site. Before we did any work on that you did testing of the soil that was there.

Could you just explain what you did and reassure everybody that the testing was done properly and it

was all found to be not contaminated at all.

MS. VAUGHN: Sure. We did a series of tests at the field adjacent to the site. During the original investigation in the early 1990's we took four surface soil samples and I believe seven or so borings going 10 feet deep into the field and the results of those samples showed no site related contamination and regional levels were normal for the region, for this area of New Jersey.

We did additional sampling during in 1995 when we were installing another fence and we found consistent results and again during the cleanup. Recently in the past couple of years we took some more samples and did not find any contamination and also while we were doing the soil cleanup on Industrial Latex as we excavated, when we dug a hole and then when you think you are done we would take samples

from the side of that whole and the bottom of the whole to make sure that we had indeed removed all the contamination. If we had to go further we could excavate more and treat more and none of that contamination went on to the recreational field.

So we have not found anything to indicate that the field is contaminated.

MS. SZPYT: Will the site be monitored any further from this point on. Will it be monitored for years to come or is it going to be tested yearly or what is done after this?

MS. VAUGHN: As far as EPA is concerned it will be done after this if we go forward with the no action decision. The state may decide to monitor it further.

MR. SORI: I don't know, did the EPA make a survey of other industries in the area?

MR. McKNIGHT: We looked at information that was already available. We looked at what the State had done, what other parties had done.

MR. SORI: There was an industry there called Tube Reducing. They had to poor a lot of oil and I don't know what happened to that oil.

MS. VAUGHN: That one we looked at.

MR. SORI: You explained to me one time the contaminants, does it dissipate with time or follow the water table?

MR. CROSSLAND: Which contaminant?

MR. SORI: Eventually with time is it going to eventually dissipate or disappear?

MR. CROSSLAND: Just to be clear we have not found any site related contaminates in the ground. The low levels are likely moving with

the groundwater and it is not being picked up from the site. That, as Bob was saying, is probably typical of an industrial area like this.

MR. SORI: Because we had a big industry and we have a lot of pollution that came from there.

MS. VAUGHN: And there is as far as I know active work going on there to help remedy that situation.

MR. McKNIGHT: Does anyone else have any other questions?

MAYOR WARGACKI: How many sites are in New Jersey?

MR. McKNIGHT: It is over a hundred.

MR. CROSSLAND: Superfund sites is 150.

MS. DETORIE: Is that considered high or normal for the size of New Jersey?

MR. McKNIGHT: New Jersey was very aggressive in identifying these sites. Some of the other states, but

not generally in this part of the country, were not as aggressive.

It is entirely possible we have bad sites out there. New Jersey has a lot. New York has a lot. But they have good state environmental programs that are able to do that.

MAYOR WARGACKI: How many sites in the State of New Jersey were cleaned up?

MS. VAUGHN: A great source for this kind of information is if you have access to WWW.EPA.GOV. All this information is on there, the number of sites per state, country wide, how many have been cleaned up and it is very interesting.

MR. PETRICKO: If we build houses there would you people buy one there?

MR. McKNIGHT: Well, I live in Hunterdon County, but as far as the site goes, sure,

MR. WINKI: I live in the

cul-de-sac that is adjacent to the fence. In other words I live 200 feet from the fence.

MS. VAUGHN: Right.

MR. WINKI: My experience has been that the wildlife is teeming. I was surprised to find dozens of gray squirrels, two black squirrels. Over the winter I fed them. I have seen all kind of birds. I have muskrats, possum, two groundhogs which live in holes. If you know groundhogs they have five entrances. They live in groundwater. The former owner had a trough on the deck. I left it. The groundhog never comes to drink water. They have a water trap. One night I was sitting on the deck and I give out bread just the way the former owner did and I had a flashlight and out of the dark I saw a pair of eyes coming to the deck. I had water on the deck. It was warm. The eyes went into the water, splashed around. So I called

my wife.

By the time my wife came there were two raccoons splashing around in the water. I threw bread at my feet on the deck. I worked on a farm so I am not afraid of animals and they came to about eight feet, the mother and father first. I went to get the camera.

When I came back with the camera there was a third raccoon coming, a fourth and a fifth. Three babies. I took pictures of them. That is an indication of something and I am right adjacent to the property.

(Continued on next page.)

MR. McKNIGHT: Thank you all for coming out tonight. The comment period ends September 3rd so if you think of something in the next few weeks feel free to write in to us or call us. The mailing address is on the facts sheets and copies of the proposed plan.

(Whereupon, at 7:30 o'clock p.m. the proceedings was concluded.)

C E R T I F I C A T E

STATE OF NEW JERSEY)
) ss.
COUNTY OF BERGEN)

I, TINA DEROSA, a Shorthand (Stenotype) Reporter and Notary Public of the State of New York, do hereby certify that the foregoing Hearing, taken at the time and place aforesaid, is a true and correct transcription of my shorthand notes.

I further certify that I am neither counsel for nor related to any party to said action, nor in any wise interested in the result or outcome thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this 20th day of August, 2001.

Tina DeRosa

TINA DEROSA