

Five-Year Review Report

Pulverizing Services Site Moorestown Township, Burlington County, New Jersey



Prepared By:

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

February 2010

Executive Summary

This is the second five-year review for the Pulverizing Services site. The site is located in the Township of Moorestown, Burlington County, New Jersey.

The site is being addressed in two remedial phases or Operable Units (OUs). Operable Unit One (OU1) was a final remedy that addressed on-site and off-site pesticide-contaminated soils, based upon a July 23, 1999 Decision Document. Operable Unit Two (OU2) addressing site-wide groundwater is currently being investigated. The OU1 remedial action has been completed and no further soil-related actions are anticipated. Under the OU2 investigation, groundwater monitoring activities are ongoing and no conclusions can be made at this time.

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This five-year review found that the remedy is functioning as intended by the Decision Document, and is protecting human health and the environment.

Five-Year Review Summary Form

SITE IDENTI	ICATION		
Site name (from WasteLAN): Pulverizing Services			
EPA ID (from WasteLAN): NJD980582142	l		
Region: 2 State: NJ City/Co	inty: Moorestown/Burlington		
SITE STA	TUS		
NPL status: □ Final □ Deleted ■Other (specify) - Nor	NPL Site		
Remediation status (choose all that apply): Under Con	struction Constructed Operating		
Multiple OUs?* 🖬 YES 🗆 NO Constru	ction completion date:		
Has site been put into reuse? □ YES ■ NO □ N/A			
REVIEW ST	ATUS		
Lead agency: EPA 🗆 State 🗆 Tribe 🗆 Other Federal	Agency		
Author name: Mark Austin			
Author title: Remedial Project Manager Author	affiliation: EPA		
Review period:** 05/01/2005 to 012/29/2009			
Date(s) of site inspection: 12/2/2009	· · · · · · · · · · · · · · · · · · ·		
Type of review: □ Post-SARA □ Pre-SARA □ NPL-Removal only ■ Non-NPL Remedial Action Site □ NPL State/Tribe-lead □ Policy □ Regional Discretion			
Review number: □ 1 (first) ■ 2 (second) □ 3 (third) 🗆 Other (specify)		
Triggering action: Actual RA Onsite Construction at OU # Construction Completion Other (specify)			
Triggering action date (from WasteLAN): May 16, 200	5 (Previous Five-Year Review)		
Does the report include recommendation(s) and follow-	up action(s)? ■ yes □ no		
Is the remedy protective of the environment?	J no		
["OU" refers to operable unit.] * [Review period should correspond to the actual start and e	nd dates of the Five-Year Review in WasteLAN.]		

Five-Year Review Summary Form (continued)

Issues

- A deed notice for continued use of the property as non-residential (commercial/light industrial), identified in the Operable Unit One (OU1) Decision Document, has yet to be implemented.

Recommendations and Follow-up Actions

- The OU1 Decision Document deed notice requirement will be implemented upon transfer of property ownership.

Other Comments on Operation, Maintenance, Monitoring, and Institutional Controls

EPA will continue to conduct oversight of routine operation and maintenance (O&M) activities at the site and adjustments to these activities will be suggested on an ongoing basis as needed.

Protectiveness Statement

The remedy at OU1 currently protects human health and the environment in the short term through the removal of pesticide-contaminated soils from the site, thereby eliminating the possibility of exposure to these soils. However, in order for the remedy to be protective in the long term, a deed notice needs to be established for the site.

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I. Introduction

The purpose of the five-year review is to determine whether the remedies at a site are protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in Five-Year Review reports. In addition, Five-Year Review reports identify issues found during the review, if any, and identify recommendations to address them.

Although the site was not placed on the National Priorities List (NPL), remedial action has been taken under Section 121(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. Section 9601, et seq., and 40 C.F.R. 300.430(f)(4)(ii) and in accordance with the Comprehensive Five-Year Review Guidance, OSWER Directive 9355.7-03B-P (June 2001).

The U.S. Environmental Protection Agency (EPA), Region 2, conducted this five-year review of the remedy implemented at the Pulverizing Services site located in the Township of Moorestown, Burlington County, New Jersey. This five-year review was conducted by Mark Austin, Remedial Project Manager (RPM). This report documents the results of the review.

This is the second five-year review for the site. The triggering action for this statutory review was the initiation of the remedial action in May 2000. A five-year review is required due to the fact that hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure.

The first five-year review for the site was conducted by EPA in May 2005. The five-year review included a site visit by EPA as well as a review of documents, data and all available information. The purpose of the first five-year review was to examine whether the remedy under Operable Unit One (OU1) for site-wide soil contamination at the site was being implemented according to the Decision Document dated July 23, 1999 and was protective of human health and the environment. Operable Unit Two (OU2) for groundwater was not initiated at that time. The 2005 five-year review determined that the remediation activities on site provided adequate protection of human health and the environment.

This five-year review found that the implemented remedy (OU1 - site-wide soils) is functioning as intended and continues to protect human health and the environment.

This site (see Figure 1) is being addressed under two Operable Units (OUs). OU1 is the final remedy addressing pesticide-contaminated soil at the site and a few specific off-site locations, based on a Decision Document issued on July 23, 1999. OU2 will be the final action at the site, which addresses site-wide groundwater.

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To date, OU1 has been completed. OU2 is currently in the investigative stage.

II. Site Chronology

Table 1, below, summarizes site-related events:

Table 1: Chronology of Site Events			
Event/Activity	Date		
International Pulverizing Co.'s manufacturing operations began.	1935		
Micronizer Company took over operations.	1946		
PPG Industries, Inc. (PPG) assumed owner-operator status.	1948		
Pulverizing Services bought out PPG.	1963		
Plant was shut down and abandoned.	1979		
New Jersey Department of Environmental Protection (NJDEP) inspected the site and sampled the soils, surface water, and air, confirming pesticide contamination in soils and surface water.	1985		
NJDEP requests EPA to assume site lead.	1987		
EPA investigates overall site, confirming NJDEP's findings and uncovered several subsurface anomalies.	1987		
Under an Administrative Order on Consent (AOC), PPG placed security fencing around property.	1988		
Under a 2nd AOC, PPG agrees to fully investigate the site for soil and groundwater contamination.	1989		
Phase I Site Investigation is performed.	1989		
Under a 3rd AOC, PPG and other responsible parties agree to remediate on- site buildings 5, 6 and 29.	1990		
Phase II Site Investigation is performed.	1994		
Spring and Fall removals from adjacent properties.	1996		
An additional removal from an adjacent property is performed in December.	1998		
Decision Document for OU1 is issued by EPA for site-related contaminated soil remediation.	1999		
Under a 4th AOC, PPG agrees to perform the 1999 Decision Document.	1999		
Response Action Project Plan for site-wide soil removal is approved by EPA.	2000		
PPG initiates performance of soil remedy with EPA oversight.	2001		

First Five-Year Review is completed.	2005
Work Plan for groundwater RI (Remedial Investigation) is approved by EPA.	2006
RI for OU2 – groundwater begins.	2006
OU1 remedy completed.	2007
OU1 Remedial Action Report is approved by EPA.	2008

III. Background

Physical Characteristics

The site consists of approximately 24 acres and is located in an industrial park in Moorestown, New Jersey. Bounded to the northeast by commercial and industrial facilities, northwest by Crider Avenue, southeast by railroad tracks, and southwest by a mix of residential, commercial, and industrial properties, the site is zoned as non-residential, (commercial/light industrial).

There are no permanent surface water bodies on the site. After heavy precipitation, the surface water runoff drains toward both the southeast and southwest corners of the site where it discharges into underground conduits connected to the township's sewer system. The residents near these drainage systems nearby the site all obtain potable water from a public water supply system.

Site Hydrogeology

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

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

Land and Resource Use

There were several owners and operators of the site from 1935 to 1979. The site was used for the formulation of pesticides. These activities, combined with poor housekeeping, led to widespread chemical contamination at the site, as well as migration of contaminants to off-site areas.

The site is currently zoned for light industrial use and is expected to remain so into the future. The site is currently surrounded by industrial, commercial and residential land uses. In evaluating potential risks posed by the site, EPA considered the possibility of future lightindustrial/ recreational development. Since the completion of the OU1 remedy, there have been several inquiries regarding the reuse of this property; however, no progress has been made.

The groundwater aquifer underlying the site is classified as a Class IIA groundwater aquifer (potable water source) by the State of New Jersey; however, it is not used for potable purposes in the vicinity of the site.

History of Contamination

A summary of site ownership is presented below:

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

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

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

During the 1950s and early 1960s, waste material was reportedly disposed of in several trenches north of the main production buildings.

In 1979, operations at the plant ceased. In 1983, the former plant production facilities were decommissioned and boarded shut.

Initial Response

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

In October 1987, after NJDEP requested EPA to assume the lead agency role for the site, EPA conducted a follow-up investigation. Samples were collected from soil, sediment, surface water, former plant structures and air. The investigation confirmed the findings of the previous NJDEP investigation and further determined that the contamination was not limited to the trench areas, but was also be found throughout the property. Under the terms of an Administrative Order on Consent (AOC) with EPA in May 1988, PPG, a former owner/operator of the facility, installed security fencing around the property.

In 1989, another AOC was issued whereby PPG agreed to perform the necessary soil and groundwater investigations at the site. In an additional 1990 AOC, other identified responsible parties agreed to perform a removal action to clean up the material in and around the site production buildings. These potential responsible parties (PRPs) included companies that sent pesticides to the facility for formulation, previous owner/operators, and the current owner of the site.

Basis for Taking Action

During 1990 and 1994/1995, Phase I and Phase II Site Investigations were conducted by PPG. These investigations revealed that the main source of environmental concern at the site were the pesticide-contaminated surface and subsurface soils. The highest concentrations of pesticides were within the vicinity of the former disposal trench. Based upon these results, a baseline Human Health Risk Assessment was conducted. The Assessment concluded that exposure at the site posed an unacceptable total cancer risk to future Site Workers through ingestion and inhalation to surface soil and subsurface soils. And if not addressed by a response measure, may present a current or potential threat to public health. The Assessment further determined that the following Chemicals of Concern and Cleanup Goals based on the 10⁻⁶ Site Worker exposure should be used:

Parameter	Site Worker Exposure		
Aldrin	, 0.34 ppm		
Dieldrin	0.36 ppm		
4, 4'-DDT	17.0 ppm		

In September 1990, building cleanup pursuant to the 1990 AOC began under the direction of EPA. Approximately 600 drums and 580 cubic yards of waste materials were shipped off site. The interiors of the buildings were also power-washed and secured.

Although groundwater contamination was detected in several monitoring wells, EPA elected to complete the groundwater site investigation after first completing the soil remedy. During both Phase I and II investigations, the shallow unconfined groundwater aquifer appeared to be the only groundwater aquifer that contains site-related chemicals of concern. Sample analysis of the deep confined aquifer indicated the site-related contamination has not migrated to this unit.

In the Spring and Fall of 1996 as well as December 1998, three corrective actions were performed to remove contaminated surface soils from three adjacent properties. This work was completed and the resulting contaminated soils were staged on-site in Building 29 for eventual disposal.

IV. Remedial Action

Remedy Selection and Implementation

On July 23, 1999, EPA issued a Decision Document addressing all contaminated surface and subsurface soils for the site. To protect human health and the environment based on available information, applicable or relevant and appropriate requirements (ARARs), and risk-based levels established in the Risk Assessment, the following objectives were established for the site:

- Mitigate potential routes of human health and environmental exposure to contaminated soils;
- Restore the soil at the site to levels which would allow for commercial reuse of the property;
- Treat and/or dispose of soils excavated from off-site properties, and stockpiled in Building 29;
- Remediate all on-site soils above the Site Worker Cleanup Goals identified in the risk assessment;
- Treat soils above 1,000 parts per million (ppm) total chlorinated pesticides (treatment level).
- Comply with ARARs, or provide grounds for invoking a waiver.

The major components of the selected response measure included:

- Excavation and transportation to an off-site disposal facility of approximately 13,100 cubic yards of contaminated soils determined to be above 0.34 parts per million (ppm) of aldrin, 0.36 ppm of dieldrin, or 17.0 ppm of 4,4'-DDT;
- Disposal of the excavated soils that are below the treatment level of 1,000 ppm of chlorinated pesticides, and are not hazardous waste pursuant to the Resource

Conservation and Recovery Act (RCRA), at an appropriate off-site landfill;

- Treatment, by off-site thermal desorption, of all contaminated soil above the 1,000 ppm treatment level, that is determined to be treatable by thermal desorption (any contaminated soil above the treatment level that cannot be treated by thermal desorption, and any soils that are deemed RCRA hazardous waste, will be sent to an off-site permitted incinerator for treatment); and
- Backfilling of the excavated areas with clean fill from an off-site location, covering these areas with topsoil, and seeding.

The preferred remedy would allow for future commercial use of the site. The response measure contemplated institutional controls, such as a deed restriction, to ensure that the future land use remains commercial.

Under the fourth and final AOC, PPG agreed to perform the OU1 Decision Document in September 1999. Field activities for the OU1 remedy activities began in April 2000. By May 2007, approximately 113,492 cubic yards of contaminated soil had been removed and transported off site. The OU1 remedy addressed contaminated soils found on all areas of the site; in addition, the remedy removed soils, believed to be contaminated as a result of site operations, on portions of the neighboring Coca-cola, Genuine Parts Company, and Whitesell properties as well as a portion of work along the New Jerséy Transit Railroad right-of-way. To address the remedial objectives, the depths of excavation varied from the first two feet of soils to as deep as approximately 14 feet below ground surface. The deeper excavations removed some soils considered to be sources of groundwater contamination. After completion of the soil excavation, the site was backfilled to grade with clean soil and restored with natural vegetation.

The implementation of the OU1 Decision Document institutional controls requirement (placement of a deed notice on the site) has not been completed. Since the owner of the site is bankrupt and is in arrears on property taxes, the deed notice requirement will be implemented when there is a transfer of property ownership.

V. Progress since the last review

The first five-year review for the site, completed in May of 2005, noted that the remedy for OU1 as being implemented in accordance with the 1999 Decision Document, was protective of human health and the environment.

Since the first five-year review, the OU1 remedy has been completed and the site has remained secure. A final remedial action report was completed and approved by EPA in April 2008. The cleanup of OU1 is protective and has restored the area to light industrial/recreational use. In addition, the OU2 groundwater remedial investigation commenced in December 2006 and is being implemented according to an August 2006 EPA-approved work plan. Initial work efforts for OU2 are focusing on sampling groundwater from the on-site monitoring wells and reviewing

all previous existing information from the site and surrounding properties. Since the 1985 NJDEP sampling results confirmed that the surface water was contaminated, a review of these results and subsequent investigation of this media will also be conducted as part of OU2.

VI. Five-Year Review Process

Administrative Components

The first five-year review, dated May 2005, determined that the site remained protective of human health and the environment while the remedy was being implemented according to the OU1 Decision Document.

For this second five-year review, the review team consisted of Mark Austin (EPA - RPM), Marc Yalom (EPA - Hydrogeologist), Charles Nace (EPA – Human Health Risk Assessor), Michael Clemetson (EPA – Ecological Risk Assessor), and Jeff Pytlak - Cummings-Riter on behalf of PPG.

Community Notification and Involvement

EPA published a notice in the Burlington County Times, a local newspaper, on December 17, 2009, notifying the community of the five-year review process. The notice indicated that EPA was in the process of conducting a five-year review of the remedy for the site to ensure that the implemented remedy remains protective of public health and the environment and is functioning as designed. It also indicated that upon completion of the five-year review, results of the review would be made available at the designated site repositories. In addition, the notice included the RPM's address and telephone number for questions related to the five-year review process or the Pulverizing Services site. The EPA RPM was not called by any members of the community regarding this five-year review.

EPA has made all site-related documents available to the public in the administrative record repositories maintained at the EPA Region II office (290 Broadway, New York, New York 10007) and the Burlington County Library, 5 Pioneer Blvd., Westampton, New Jersey 08060.

Document Review

This five-year review utilized a review of various site-related documents (See Attachment B for a list of these documents).

Data Review

Since OU1 is completed, no new data exists for this five-year review.

Site Inspection

An inspection of the Pulverizing Services site was conducted on December 2, 2009. The following parties were in attendance: Mark Austin, EPA Region II RPM; Marc Yalom, EPA Region II Hydrogeologist; Charles Nace, EPA Region II Human Health Risk Assessor; Michael Clemetson, EPA Region II Ecological Risk Assessor; and, Jeffrey Pytlak, PPG's representative (Cummings/Riter Consultants, Inc.).

The site inspection consisted of a physical inspection of the entire remediated property, security fencing, monitoring wells, on-site drainage systems, and surrounding off-site areas.

The following sections present the results of the site inspection, separated into each inspected element.

<u>Security Fencing</u> - Upon inspection, no deficiencies were noted regarding the site security fencing.

<u>Groundwater Monitoring Wells</u> - There are a number of wells on the site that are part of the OU2 sampling plan. No damages were observed. All wells were determined to be in good working order and locked. These wells will continue to be inspected throughout the investigative process, as needed. If there is a need to decommission any wells in the future, the appropriate actions will be taken.

<u>Surrounding Areas</u> - Nothing out of the ordinary was noted. No new construction on neighboring properties or other factors that might change exposure scenarios were identified.

<u>On-site Drainage System</u> - The drainage systems were inspected. No blockages or debris were noted and water was flowing through the system. New vegetative growth was observed in all areas.

Interviews

During the site inspection, EPA met with PPG's representative (Cummings/Riter) who has been tasked with completing the wetlands O&M program and the OU2 groundwater investigation. Cummings/Riter indicated that they did not have any specific concerns regarding the existing wetlands program or the groundwater investigation nor have they received any public inquiries.

VII. Technical Assessment

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

The remedy for the site consisted of excavation with off-site transportation of contaminated soil on the site proper and excavation with off-site transportation of contaminated soil/sediment in the drainage areas off-site. The off-site remedial action occurred after the completion of the previous five-year review. Since the contaminated soil was removed from the site and off-site drainage areas, the remedy is functioning as intended by the Decision Document.

Although the institutional controls requirement (placing a deed notice on the property to ensure continued use as non-residential) has yet to be implemented, no activities on site have been observed, nor has EPA been alerted to any transfer of ownership that would need to precede reuse of the property.

Since there has been limited investigation of the groundwater, there has been no decision regarding the need for a remedy.

In addition, the remedy has eliminated exposure to ecological receptors by the removal and treatment of contaminated surface soil. Therefore, the remedial action is functioning as intended for the ecological interests at the site.

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

The previous five-year review evaluated the exposure assumptions and toxicity values that were used to evaluate the site during the remedial investigation. The findings from the previous five-year review were that the exposure assumptions and toxicity values were still valid. During this five-year review, the exposure assumptions and toxicity values were reevaluated, and they are still valid. In addition, the cleanup values that were used and the remedial action objectives still remain valid. In summary, the potential exposure pathways for contaminated soil and sediment for on-site and off-site areas have been effectively eliminated through the removal of the contaminated media.

The groundwater associated with the site is still under investigation; therefore, vapor intrusion has not been evaluated for the site. This pathway will be evaluated as the groundwater investigation progresses.

Ecologically, the 1999 Decision Document assessed ecological risks and determined appropriate cleanup levels for surface soil. Contaminated surface soil was excavated and clean backfill was used to cover these areas. In addition, all associated wetland restoration was completed. As a result, the potential for exposure to ecological receptors has been eliminated; and the remedial action objectives used at the time of the remedy are still valid.

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

There has not been any other information that has come to light that could call into question the protectiveness of the remedy that has been selected to date.

Technical Assessment Summary

According to the reviewed data, and the site inspection, the OU1 remedy is functioning as intended by the Decision Document.

VIII. Issues, Recommendations and Follow-up Actions

Table 2, below, summarizes site-related issues, recommendations and proposed follow-up actions.

Table 2						
Issue	Recommendations & Follow-up Actions	Party Responsible	Oversight Agency	Milestone Date	Affe Protecti (Y/	ects veness? N)
	· · · · · · · · · · · · · · · · · · ·				Current	Future
A deed notice for continued use of the property as non-	The OU1 Decision Document deed notice requirement will be	Prospective property owner.	EPA	Jan. 1, 2015	N	Y
residential (commercial/light	implemented upon transfer of property			1	· · ·	· ·
industrial), identified in the OU1 Decision	ownership.					
Document, has yet to be implemented.						

IX. Protectiveness Statement

The remedy at OU1 currently protects human health and the environment in the short term through the removal of pesticide-contaminated soils from the site, thereby eliminating the possibility of exposure to these soils. However, in order for the remedy to be protective in the long term, a deed notice needs to be established for the site.

X. Next Review

The next Five-Year Review for the Pulverizing Services site should be completed by February 2015.

Approved

2/3/2010

Walter E. Mugdan, Director Emergency and Remedial Response Division

Date

ATTACHMENT A - LIST OF ACRONYMS

	ACO	Administrative Consent Order
	ARARs	Applicable or Relevant and Appropriate Requirements
	BHC	Benzene Hexachloride
	CEA	Classification Exception Area
	CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
	ĊÒC	Contaminant of Concern
	DD	Decision Document
	DDT	dichlorodiphenyltrichloroethylene
	EPA	(United States) Environmental Protection Agency
	ESD	Explanation of Significant Differences
	FS	Feasibility Study
	GWQS	Groundwater Quality Standard
·	IRIS	Integrated Risk Information System
	LTM	Long-Term Monitoring
	MCL	Maximum Contaminant Level
•••	NJDEP	New Jersey Department of Environmental Protection
	NJGWQS	New Jersey Groundwater Quality Standard
	NPL	National Priorities list
	O&M	Operation & Maintenance
	OUs	Operable Units
•	OU1	Operable Unit One
	OU2	Operable Unit Two
	ppb	Parts Per Billion
	ppm	Parts Per Million
	PRGs	Preliminary Remediation Goals
	PRP	Potentially Responsible Party
	RA	Remedial Action
	RAO	Remedial Action Objective
	RCRA	Resource Conservation and Recovery Act
	RD	Remedial Design
	RI	Remedial Investigation
	RME	Response Measures Evaluation report
	RPM	Remedial Project Manager
	SVOC	Semi-volatile Organic Compound
	VOCs	Volatile Organic Compounds

ATTACHMENT B - DOCUMENTS REVIEWED

- U.S. Environmental Protection Agency, "Decision Document, Pulverizing Services Site, Moorestown, Burlington County, NJ," Region 2, New York, New York, July 1999.
- U.S. Environmental Protection Agency, "EPA Five-Year Review Report: Pulverizng Services Site, Moorestown Township, Burlington County, NJ," Region 2, New York, New York, May 2005.
- Cummings Riter Consultants, Inc, "Final Remedial Action Report: Areas A and C, Operable Unit 1, Removal of Contaminated Soil, Pulverizing Services Site, Moorestown, NJ," March 2008.
- Cummings Riter Consultants, Inc, "Final Remedial Action Report: Area B, Operable Unit 1, Removal of Contaminated Soil, Pulverizing Services Site, Moorestown, NJ," March 2008.
- Cummings Riter Consultants, Inc, "Groundwater/Surface Water Monitoring Plan, Pulverizing Services Site, Moorestown, NJ," August 2006.
- Cummings Riter Consultants, Inc, "Data Summary Report, Groundwater/Surface Water Monitoring, Pulverizing Services Site, Moorestown, NJ," March 2007.
- McLaren Hart Environmental Engineering Company, "Phase II Site Evaluation Report,
- Pulverizing Services Site, Moorestown, NJ", May 1995
- ICF Kaiser Engineers, "Response Measures Evaluation Report, Pulverizing Services Site, Moorestown, Burlington County, NJ", December 1997



