State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029
TRENTON, NEW JERSEY 08625

JOHN W. GASTON JR., P.E.
DIRECTOR

DIRK C. HOFMAN, P.E.
DEPUTY DIRECTOR

September 27, 1985

Mr. Joseph Ronzo, Plant Engineer
Franklin Plastics Corporation
113 Passaic Avenue
Kearny, NJ 07032

Re: Compliance Evaluation Inspection
Franklin Plastics Corporation
NJPDES No. NJ 0002194
Kearny/Hudson County

Dear Mr. Ronzo:

A Compliance Evaluation Inspection of your facility was conducted by a representative of this Division on July 16, 1985. A copy of the completed inspection report form is enclosed for your information.

Your facility received a rating of "UNACCEPTABLE" due to the following deficiency:

> Sample results for temperature, chromium and zinc exceed permit limitations.

Since the deficiency cited is presently, or could, in the future, adversely affect effluent quality; you are DIRECTED to institute measures to correct the deficiency. A written report concerning specific details of remedial measures to be instituted, as well as an implementation timetable, must be submitted to this Department and USEPA, Permits Administration Branch, within thirty (30) calendar days of the date of this correspondence.

Please direct all correspondence and inquiries to Michael J. Pierdinock, the Compliance Investigator responsible for this case, who can be reached at (201) 648-2200 or by letter through this Division.

Failure to fully comply with the above will result in the initiation of enforcement action by this Department and/or the United States Environmental Protection Agency. This shall in no way be construed, however, to indicate any exemption on your part from possible penalties for violations indicated by the Compliance Evaluation Inspection, as stated above.

Very truly yours,

Thomas B. Harrington

Thomas B. Harrington
Field Operations Supervisor
Metro Bureau of
Regional Enforcement

A28:G25

cc: Dr. Richard A. Baker, USEPA
Mr. Paul Molinari, USEPA
Mr. Edward Grosvenor, H.O.

Enclosure

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029, Trenton, N.J. 08625

DISCHARGE SURVEILLANCE REPORT

PERMIT # NJ0002194 NO. OF DISCHARGES 001 CLASS MIN/IND

DISCHARGER FRANKLIN PLASTICS CORP.

OWNER FRANKLIN PLASTICS CORP.

MUNICIPALITY KEARNY COUNTY HUDSON WATERSHED CODE 1

LOCATION 113 PASSAIC AVENUE

RECEIVING WATERS PASSAIC RIVER STREAM CLASS TW-3

LICENSED OPERATOR & PLANT CLASS —

TRAINEE/ASSISTANT — OTHER INFO. 201-995-5002

DEFICIENCIES OR COMMENTS SAMPLE RESULTS FOR TEMPERATURE, CHROMIUM AND ZINC EXCEED PERMIT LIMITS.

OVERALL RATING ☐ Acceptable ☐ Conditionally Acceptable ☒ Unacceptable

EVALUATOR MICHAEL J. MCMANUS LOUISE DOUGHTON TITLE ENVIRONMENTAL ENGINEER INVESTIGATOR III

INFORMATION FURNISHED BY (Name) JOSEPH RONZO

(Title) PLANT ENGINEER (Organization) FRANKLIN PLASTICS

DATE OF INSPECTION [illegible]

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ0002194
Date: JULY 16, 1985

INDUSTRIAL TREATMENT PROCESS EVALUATION

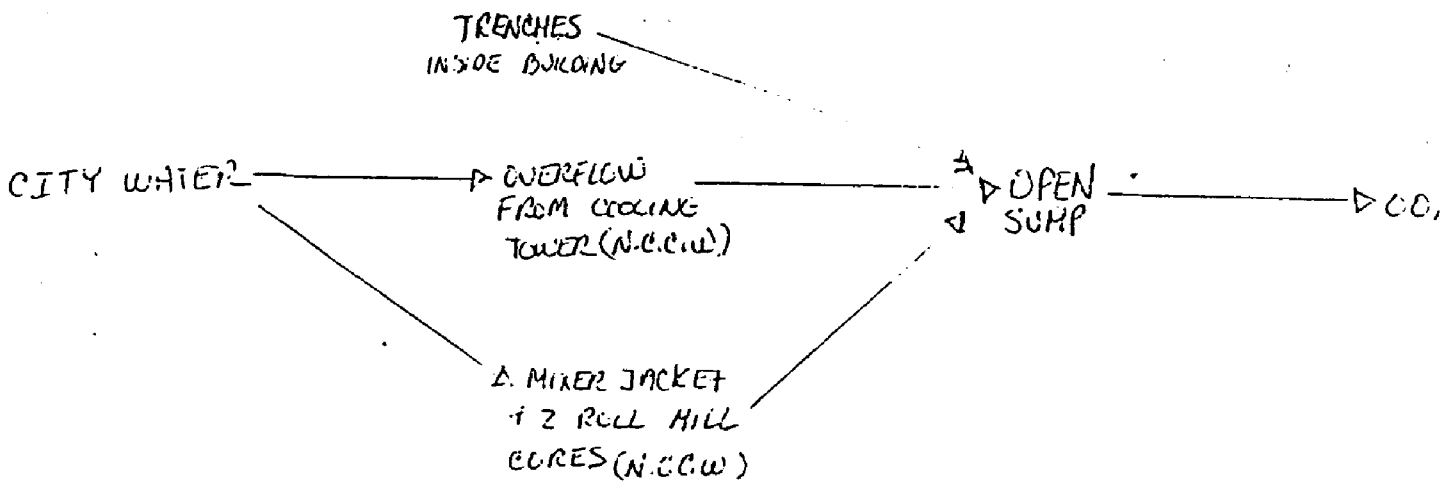
RATING CODES: S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable

		RATING	COMMENTS
GENERAL	DISCHARGE # 001	---	NON CONTACT COOLING WATER FOR LAB,
	WASTEWATER SOURCE(S)	---	MIXER JACKET + 2 ROLL MILLS
	CONTINUITY OF OPERATION	---	INTERMITTENT
	BYPASSES/OVERFLOWS	NA	
	S.P.C.C. PLAN	S	REVISED / NEFCO
	ALARM SYSTEMS	NA	
	ALTERNATE POWER SUPPLY	NA	
TREATMENT PROCESSES			
SLUDGE HANDLING			
	DISPOSAL SITE		GARBAGE DISPOSAL
			SAM MIELE / KEARNY
OTHER INFORMATION	FLOW METER & RECORDER	S	BUCKET AND STOP WATCH
	RECORDS	S	
	SAMPLING PROCEDURES	S	
	ANALYSES PERFORMED BY	S	GOLLOB ANALYTICAL SERVICE
			47 INDUSTRIAL ROAD, BERKELEY HEIGHTS
	FINAL EFFLUENT APPEARENCE	S	
	REC. WATERS APPEARENCE	S	

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ CCC 2194
Date: July 16, 1985

PLANT DIAGRAM AND FLOW SEQUENCE:



SAMPLING PERIOD: GRAB COMPOSITE INTERVAL: —

DISCHG	PARA	SAMPLE TYPE	PERMIT LIMITS	SAMPLE RESULT	DISCHG	PARA	SAMPLE TYPE	PERMIT LIMITS	SAMPLE RESULT
001	TEMP	GRAB	30°C	32°C	001	PETRO HYD.	GRAB	—	< 1 ppm
"	COD	"	40 mg/l	18 mg/l	"	CHLORIDE	"	—	19 ppm
"	pH	"	6.0-9.0	—					
"	OIL + GREASE	"	10.0 mg/l	NOT TAKEN					
"	Cr	"	0.5 mg/l	8.0 ppm					
"	Zn	"	1.0 mg/l	33 ppm					

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029
TRENTON, NEW JERSEY 08625

IN W. GASTON JR., P.E.
DIRECTOR

DIRK C. HOFMAN, P.E.
DEPUTY DIRECTOR

JUN 2 8 1985

oseph Ronzo
ranklin Plastics Corp.
13 Passaic Avenue
earny, New Jersey 07032

E: NJPDES Permit No. NJ0002194
Effective Date: August 1, 1985

ear Mr. Ronzo:

nclosed is the Final NJPDES/DSW Permit and Notice of Authorizaion to discharge pollutants to the Passaic River, issued in ccordance with the New Jersey Pollutant Discharge Elimination ystem Regulations, N.J.A.C. 7:14A-1 et seq. Violation of any ondition of this permit may subject you to significant enalties.

ithin 30 calendar days following your receipt of this permit, nder N.J.A.C. 7:14A-8.6, you may submit a request to the dministrator for an adjudicatory hearing to reconsider or ontest the conditions of this permit. Regulations regarding the ormat and requirements for requesting an adjudicatory hearing ay be found in N.J.A.C. 7:14A-8.9 through 8.13. The request hould be made to:

Administrator
Water Quality Management Element
Division of Water Resources
CN-029
Trenton, New Jersey 08625

pplications for renewal of this permit must be submitted at least 80 days prior to expiration of this permit pursuant to N.J.A.C. :14A-2.1(f)5.

f you have any questions on this action, please contact ir. Edward Post, P.E., Chief, Industrial Permits Section at (609) 92-0407.

Sincerely,

Paul C. Kurisko

Paul C. Kurisko, P.E., Chief
Bureau of Industrial Waste Management
Water Quality Management

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF AUTHORIZATION

PERMIT NO.	ISSUANCE DATE	EFFECTIVE DATE	EXPIRATION DATE
NJ0002194	June 28, 1985	August 1, 1985	July 31, 1990

ISSUED TO
Franklin Plastics Corp.
113 Plastics Avenue
Kearny, N.J. 07032

FOR ACTIVITY/FACILITY AT
Same as Applicant

OWNER
Same as Applicant

ISSUING DIVISION	TYPE OF PERMIT	STATUTE(S)	APPLICATION N
Water Resources	NJPDES/DSW	N.J.S.A. 58:10A-1 et seq.	NJ0002194

A PERMIT TO

Discharge to the Passaic River classified as TW-3 waters, in accordance with effluent limitations, monitoring requirements and other conditions as set forth in Parts I, II, and III hereof.

By the Authority of:
John W. Gaston Jr., P.E.
Director
Division of Water Resources

DEP AUTHORIZATION

EP-008
/84

THIS NOTICE MUST BE CONSPICUOUSLY DISPLAYED AT THE ACTIVITY/FACILITY SITE.

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CN 402
Trenton, N.J. 08625

PERMIT

The New Jersey Department of Environmental Protection grants this permit in accordance with your application, attachments accompanying same application, and applicable laws and regulations. This permit is also subject to the further conditions and stipulations enumerated in the supporting documents which are agreed to by the permittee upon acceptance of the permit.

Permit No.	Issuance Date	Effective Date	Expiration Date
NJ0002194	June 28, 1985	August 1, 1985	July 31, 1990

Name and Address of Applicant	Location of Activity/Facility	Name and Address of Owner
Franklin Plastics Corp. 113 Plastics Avenue Kearny, N.J. 07032	Same as Applicant	Same as Applicant

Issuing Division	Type of Permit	Statute(s)	Application No.
Water Resources	NJPDES/DSW	N.J.S.A. 58:10A-1 et seq.	NJ0002194

This permit grants permission to:

Discharge to the Passaic River classified as TW-3 waters, in accordance with effluent limitations, monitoring requirements and other conditions as set forth in Parts I, II, and III hereof.

Approved by the Department of Environmental Protection
By the Authority of:
John W. Gaston Jr., P.E.
Director
Division of Water Resources

Arnold Schiffman, Administrator
Water Quality Management

6/28/85
DATE

The word permit means "approval, certification, registration, etc."

(GENERAL CONDITIONS ARE ON THE REVERSE SIDE.)

ADDITIONAL GENERAL CONDITIONS FOR NJPDES/DSW PERMITS FROM
INDUSTRIAL/COMMERCIAL AND/OR THERMAL DISCHARGES

1. The following additional conditions applicable to specified categories of DSW permits in accordance with N.J.A.C. 7:14A-3.11, in addition to those set forth in N.J.A.C. 7:14A-2.5, 3.10 and 3.12, hereby apply to all DSW permits within the categories specified below:

Existing manufacturing, commercial, mining, and silvicultural dischargers and research facilities.

In addition to the reporting requirements under Section 7.5(a)12 and Section 3.10 of N.J.A.C. 7:14A-1 et seq., all existing manufacturing, commercial, mining, and silvicultural dischargers and research facilities must notify the Department as soon as they know or have reason to believe:

A. That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(1) One hundred micrograms per liter (100 ug/l);

(2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;

(3) Five (5) times the maximum concentration value reported for the pollutant in the permit application in accordance with N.J.A.C. 7:14A-10.3(a)9, or 10.3(a)12; or

(4) The level established by the Department in accordance with N.J.A.C. 7:14A-3.13(a)6.

B. That they (except for research facilities) have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application under N.J.A.C. 7:14A-3.2 and 10.3(a)11.

[illegible] required by this permit to monitor for oil and grease and/or Petroleum Hydrocarbons [illegible] the [illegible] and grease effluent [illegible]

[illegible] existing permit.

[illegible] monitoring results for each reporting period [illegible] Department's [illegible] report [illegible] shall be submitted [illegible] following the completed reporting period.

CHECKLIST OF PARTS AND MODULES COMPRISING THIS NJPDES PERMIT

1. Cover Page

2. Checklist ✓

3. Part I (General Conditions for All NJPDES Discharge Permits) ✓

4. Part II - Additional General Conditions for the types of NJPDES Permits checked as follows:

____ Part II - A (Municipal/Sanitary)

__X__ Part II - B/C (Industrial/Commercial/Thermal)

____ Part II - L (SIU)

____ Part II - IWMF (Industrial Waste Management Facility)

____ Part II - DGW Specify type(s):_____

_____

_____

5. Part III - Effluent Limitations and Monitoring Requirements

____ Part III - A

__X__ Part III - B/C

____ Part III - L

____ Part III - DGW Specify type(s):_____

_____

_____

6. Part IV - Special Conditions

____ Part IV - A

____ Part IV - B/C

____ Part IV - L

____ Part IV - IWMF

____ Part IV - DGW Specify type(s):_____

_____

_____

B. Within ninety (90) days from receipt of NJDEP's written approval of the Sampling Plan prepared, pursuant to N.J.A.C. 7:1-3.7(d)14 and N.J.A.C. 7:1-3.9, Franklin shall initiate, complete, and submit to NJDEP the results from any NJDEP-approved Sampling Plan including, but not limited to, complete delineation of environmental contamination on-site, and any off-site environmental contamination resulting from discharges of hazardous wastes or substances on or from the subject Industrial Establishment. NJDEP and Franklin recognize that additional sampling may be necessary during the various stages of the implementation of this Administrative Consent Order and ECRA, including during the implementation of a Cleanup Plan, at the subject Industrial Establishment to delineate fully the nature and extent of environmental contamination on-site, and any off-site environmental contamination resulting from discharges of hazardous substances or wastes on or from the subject Industrial Establishment. Therefore, Franklin agrees to submit any additional sampling plans for NJDEP review and approval required by NJDEP in writing during the various stages of the implementation of this Administrative Consent Order and ECRA, including during the implementation of a Cleanup Plan, to further delineate the nature and extent of environmental contamination on or from the subject Industrial Establishment. NJDEP and Franklin mutually agree that Franklin shall submit any additional sampling plans required to NJDEP for review and approval within thirty (30) days of the receipt of said written request. Within ninety (90) days from receipt of NJDEP's written approval of any additional sampling plans, Franklin shall initiate, complete and submit to NJDEP the results from any additional NJDEP-approved sampling plan required pursuant to this paragraph.

C. Franklin shall submit a Negative Declaration or Cleanup Plan within sixty (60) days from receipt of a written demand from NJDEP for a Negative Declaration or Cleanup Plan. If a Cleanup Plan is required, the Cleanup Plan shall address remediation of any contamination identified on or from the subject Industrial Establishment. Any Negative Declaration or Cleanup Plan submitted shall conform to N.J.A.C. 7:1-3. NJDEP shall notify Franklin in writing requiring Franklin to submit either a Negative Declaration or Cleanup Plan when sampling results have satisfied NJDEP's requirement to delineate fully the nature and extent of environmental contamination on or from the subject Industrial Establishment.

D. Franklin shall implement any NJDEP approved Cleanup Plan in accordance with the approved time schedule or defer implementation of all or part of the Cleanup Plan subject to NJDEP approval pursuant to N.J.A.C. 7:1-3.14.

E. Should NJDEP determine that any submittal made under Paragraph 10 of this Administrative Consent Order is inadequate or incomplete, then NJDEP shall provide Franklin with written notification of the deficiency(ies), and Franklin shall revise and resubmit the required information within a reasonable period of time not to exceed thirty (30) days from receipt of such notification.

F. All submissions requred pursuant to Paragraph 10 or any other provision of this Administrative Consent Order shall be accompanied by all appropriate fees required pursuant to the Fee Schedule for ECRA, N.J.A.C. 7:1-4.

11. Financial Assurance

A. Franklin shall obtain and provide to NJDEP financial assurance in the form of a surety bond or letter of credit in the amount of $500,000 within seven (7) days from the effective date of this Administrative Consent Order. The financial assurance must conform with the requirements of N.J.S.A. 13:1K-9(b)3, N.J.A.C. 7:1-3.10, N.J.A.C. 7:1-3.13, and this Administrative Consent Order.

B. Franklin shall establish and submit to NJDEP a standby trust fund within seven (7) days from the effective date of this Administrative Consent Order. The financial institution which issues the financial assurance shall agree to promptly and directly deposit all amounts up to the total value of the financial assurance into the standby trust fund upon demand by NJDEP.

C. Upon NJDEP approval of a Cleanup Plan, Franklin shall amend the amount of the financial assurance, described in A. above, to equal the estimated cost of implementation of the approved Cleanup Plan, or shall provide such other financial assurance as may be approved by NJDEP in an amount equal to the estimated cost of implementation of the approved Cleanup Plan.

D. In the event that NJDEP determines that Franklin has failed to perform any of its obligations under this Administrative Consent Order or ECRA, NJDEP may draw on the financial assurance provided, however, that before any such demand is made, NJDEP shall notify Franklin in writing of the obligation(s) with which it has not complied, and Franklin shall have reasonable time, not to exceed fourteen (14) calendar days, to perform such obligation(s) to NJDEP's satisfaction. Nothing in this paragraph shall prevent NJDEP from collecting stipulated penalties pursuant to the terms of this Administrative Consent Order for cause.

E. Upon NJDEP's written approval of a Negative Declaration, Franklin shall be relieved of any further obligation to maintain in full force and effect the financial assurance required by this Administrative Consent Order for the facility which is the subject of the NJDEP-approved Negative Declaration. Upon NJDEP's written approval of the completion of any cleanup required by this Administrative Consent Order, as verified by final site inspection pursuant to N.J.A.C. 7:1-3.12(e) and upon Franklin's satisfaction of all financial obligations in connection therewith, Franklin shall be relieved of any further obligation to maintain in full force and effect the financial assurance required by this Administrative Consent Order for the facility at which the approved cleanup has been completed.

12. Additional Conditions of Consent

A. Franklin shall allow NJDEP access to the subject Industrial Establishment for the purpose of undertaking all necessary monitoring and environmental cleanup activities. Prior to entry into this Administrative Consent Order, Franklin shall provide NJDEP with appropriate documentation that SFI shall allow the NJDEP access required herein.

B. Compliance with the terms of this Administrative Consent Order shall not excuse Franklin from obtaining and complying with any applicable federal, state or local permits, statutes, regulations and/or orders while carrying out the obligations imposed by ECRA through this Administrative Consent Order. The execution of this Administrative Consent Order shall not excuse Franklin from compliance with all other applicable environmental permits, statutes, regulations and/or orders and shall not preclude NJDEP from requiring that Franklin obtain and comply with any permits, and/or orders issued by NJDEP under the authority of the Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq., and the Spill Compensation and Control Act ("Spill Act") N.J.S.A. 58:10-23.11 et seq., for the matters covered herein. The terms and conditions of any such permit shall not be pre-empted by the terms and conditions of this Administrative Consent Order if the terms and conditions of any such permit are more stringent than the terms and conditions of this Administrative Consent Order. Should any of the measures to be taken by Franklin during the remediation of any ground water and surface water pollution result in a new or modified discharge as defined in the NJPDES regulations, N.J.A.C. 7:14A-1 et seq., then Franklin shall obtain a NJPDES permit or permit modification from NJDEP prior to commencement of said activity.

C. NJDEP agrees that it will not bring any action, nor will it recommend that the Attorney General's Office bring any action for failure to comply with (a) the time requirements in N.J.S.A. 13:1K-9(b)1 that NJDEP be notified within five (5) days of execution of an agreement of sale and (b) the time requirement in N.J.S.A. 13:1K-9(b)2 that a Negative Declaration or Cleanup Plan be submitted sixty (60) days prior to transfer of title. NJDEP also agrees that it will not bring any action, nor will it recommend that the Attorney General bring any action seeking monetary penalties for Franklin's failure to meet the time requirements specified in (a) and (b) of this paragraph.

D. No obligations imposed by this Administrative Consent Order (other than by paragraph "E" below) are intended to constitute a debt, claim, penalty or other civil action which could be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Administrative Consent Order shall constitute continuing regulatory obligations imposed pursuant to the police power of the State of New Jersey, intended to protect the public health, safety and welfare.

E. In the event that Franklin fails to comply with any of the provisions of this Administrative Consent Order, Franklin shall pay to NJDEP stipulated penalties in the amount of $5,000.00 for each day on which Franklin fails to comply with any obligation under this Administrative Consent Order provided, however, that no such stipulated penalty shall be payable by Franklin with respect to such period that said failure to comply results from Force Majeure.

F. The provisions of this Administrative Consent Order shall be binding upon Franklin and its officers, management officials, employees, agents, successors in interest, assigns, tenants, and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.

G. Franklin's failure to submit an approvable Negative Declaration or Cleanup Plan shall constitute grounds for the NJDEP to void the subject sale or transfer. NJDEP's right to void the subject sale or transfer shall terminate upon NJDEP's written approval of an appropriate Negative Declaration or Cleanup Plan submitted by Franklin pursuant to this Administrative Consent Order and ECRA.

H. Any submission to be made to NJDEP in accordance with this Administrative Consent Order shall be directed to:

Anthony J. McMahon, Chief
Bureau of Industrial Site Evaluation
Division of Waste Management
428 East State Street
Trenton, NJ 08608

13. Force Majeure

If any event occurs which purportedly causes or may cause delays in the achievement of any deadline contained in this Administrative Consent Order, Franklin shall notify NJDEP in writing within ten (10) days of the delay or anticipated delay, as appropriate, referencing this paragraph and describing the anticipated length, precise cause or causes, measures taken or to be taken and the time required to minimize the delay. Franklin shall adopt all necessary measures to prevent or minimize any delay. If any delay or anticipated delay had been or will be caused by fire, flood, storm, riot, strike or other circumstances alleged to be beyond the control of Franklin, then the time for performance hereunder may be extended by NJDEP for a period no longer than the delay resulting from such circumstances, provided that NJDEP may grant additional extensions for good cause. If the events causing such delay are not found by NJDEP to be beyond the control of Franklin, failure to comply with the provisions of the Administrative Consent Order shall constitute a breach of the Administrative Consent Order's requirements. The burden of proving that any delay is caused by circumstances beyond Franklin's control and the length of such delay attributable to those circumstances shall rest with Franklin. Increases in the costs or expenses incurred in fulfilling the requirements contained herein shall not be a basis for an extension of time. Similarly, delay in completing an interim requirement shall not automatically justify or excuse delay in the attainment of subsequent requirements.

14. Reservation of Rights

This Administrative Consent Order shall be fully enforceable in the New Jersey Superior Court having jurisdiction over the subject matter and signatory parties upon the filing of a summary action for compliance pursuant to ECRA. This Administrative Consent Order may be enforced in the same manner as an Administrative Order issued by NJDEP pursuant to other statutory authority and shall not preclude NJDEP from taking whatever action

it deems appropriate to enforce the environmental protection laws of the State of New Jersey in any manner not inconsistent with the terms of this Administrative Consent Order. It is expressly recognized by NJDEP and Franklin that nothing in this Administrative Consent Order shall be construed as a waiver by NJDEP of its rights with respect to enforcement of ECRA on bases other than those set forth in the ECRA Program Requirements section of this Administrative Consent Order or by Franklin of its right to seek review of any enforcement action as provided by the Administrative Procedure Act, N.J.S.A. 52:14B-1 et seq. Furthermore, nothing in this Administrative Consent Order shall constitute a waiver of any statutory right of NJDEP to require Franklin to implement additional remedial measures should NJDEP determine that such measures are necessary to protect the public health, safety and welfare.

15. Franklin hereby consents to entry of this Administrative Consent Order and waives its right to a hearing concerning the terms hereof pursuant to N.J.S.A. 52:14B-1 et seq.

16. This Administrative Consent Order shall take effect upon the signature of all parties. Upon the signature of all parties, Franklin may complete the sale or transfer of the Kearny facility subject to the Administrative Consent Order.

NEW JERSEY DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Date: February 14, 1986

By: _____
Joseph Rogalski, Assistant
Director for Enforcement &
Field Operations

FRANKLIN PLASTICS CORP.

Date: February 14, 1986

By: _____

Name: DANIEL POMERANTZ

Title: PRESIDENT

02-9002-24-SI
REV. NO. 0

FINAL DRAFT
SITE INSPECTION REPORT
FRANKLIN PLASTICS CORP.
VOLUME 1 OF 2
PREPARED UNDER

TECHNICAL DIRECTIVE DOCUMENT NO. 02-9002-24
CONTRACT NO. 68-01-7346

FOR THE

ENVIRONMENTAL SERVICES DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

SEPTEMBER 17, 1990

NUS CORPORATION
SUPERFUND DIVISION

SUBMITTED BY:

DAVE GRUPP
PROJECT MANAGER

KATHY CAMPBELL
SITE MANAGER

REVIEWED/APPROVED BY:

RONALD M. NAMAN
FIT OFFICE MANAGER

848120007

02-9002-24-SI
Rev. No. 0

LEVEL I SITE INSPECTION REPORT

PART I: SITE INFORMATION

1. Site Name/Alias Franklin Plastics Corp.
   Street 113 Passaic Avenue
   City Kearny State New Jersey Zip 07032
2. County Hudson County Code 017 Cong. Dist. 14
3. EPA ID No. NJD011121589
4. Latitude 40° 45' 16" N Longitude 74° 09' 48" W
   USGS Quad. Orange, New Jersey - New York
5. Owner Franklin Plastics Corp. Tel. No. (201) 998-8002
   Street 113 Passaic Avenue
   City Kearny State New Jersey Zip 07032
6. Operator Franklin Plastics Corp. Tel. No. (201) 998-8002
   Street 113 Passaic Avenue
   City Kearny State New Jersey Zip 07032
7. Type of Ownership
   ☒ Private ☐ Federal ☐ State
   ☐ County ☐ Municipal ☐ Unknown ☐ Other
8. Owner/Operator Notification on File
   ☐ RCRA 3001 Date ☒ CERCLA 103c Date 01/80
   ☐ None ☐ Unknown
9. Permit Information

Permit	Permit No.	Date Issued	Expiration Date	Comments
NJPDES	NJ0002194	06/28/85	07/31/90	

10. Site Status
    ☒ Active ☐ Inactive ☐ Unknown
11. Years of Operation 1976 to Present

848120008

12. Identify the types of waste units (e.g., landfill, surface impoundment, piles, stained soil, above- or below-ground tanks or containers, land treatment, etc.) on site. Initiate as many waste unit numbers as needed to identify all waste sources on site.

(a) Waste Management Areas

Waste Unit No.	Waste Unit Type	Facility Name for Unit
1	Stained Soil Area No. 1	Soil Southwest of Blower Pad
2	Stained Soil Area No. 2	Soil East of Expansion Chamber
3	Noncontact Cooling Water Discharge	NJPDES Permit No. NJ0002194
4	Tank Farm Area	Plasticizer Tank Farm
5	Abandoned Drums and Sludge Pile	Abandoned Drums and Sludge Pile

(b) Other Areas of Concern

Identify any miscellaneous spills, dumping, etc. on site; describe the materials and identify their locations on site.

The NJ Department of Environmental Protection Investigative Report of December 20, 1984, observed the premises to be clean, except for minor spills of oils in the truck unloading area and minor spills of white-powdered resins from manufacturing. The resins were reported to be cleaned up at the end of each working day. Franklin Plastics received a Notice of Violation for oily spills along the eastern wall of the main building. These spills probably were due to the release of oil-contaminated steam. On January 5, 1985, Franklin Plastics informed the NJDEP that they had removed 25-45 lbs. of material from this contaminated area and disposed of it in the garbage.

Franklin Plastics maintains one No. 6 fuel oil tank, which is located on the northern, leased portion of the site. The capacity of this aboveground tank is approximately 50,000 gallons. In June 1984, New England Pollution Control Company developed a Spill Prevention, Control, and Countermeasure (SPCC) Plan for Franklin Plastics Corp. A 6,000-gallon underground gasoline tank was removed on February 4, 1986. Upon the tank's removal, surrounding soil appeared to be contaminated from gasoline leakage.

Environment Cleanup Responsibility Act (ECRA) sampling results of July 1987 collected from a former sink discharge area indicate the presence of phthalates. The sink was used by maintenance employees and discharged directly to the surface. Analysis of a surface soil sample from this area indicated the presence of bis(2-ethylhexyl) phthalate (340 ppm), butylbenzyl phthalate (51 ppm), and di-n-octyl phthalate (14 ppm). A petroleum hydrocarbon concentration of 19,000 ppm was reported. The sink in no longer in use.

An on-site reconnaissance performed by NUS Corp. Region 2 FIT in April 1990 noted a condenser blowdown drainage path between the southwest edge of the manufacturing building and the tank farm. The liquid in this drainage ditch was golden/brown in color; its exact constituents are unknown.

Ref. Nos. 2,4, 5,6,13,24,29

13. Information available from

Contact Amy Brochu Agency U.S. EPA Tel. No. (201) 906-6802

Preparer K. Campbell Agency NUS Corp. Region 2 FIT Date Sept. 17, 1990

848120009

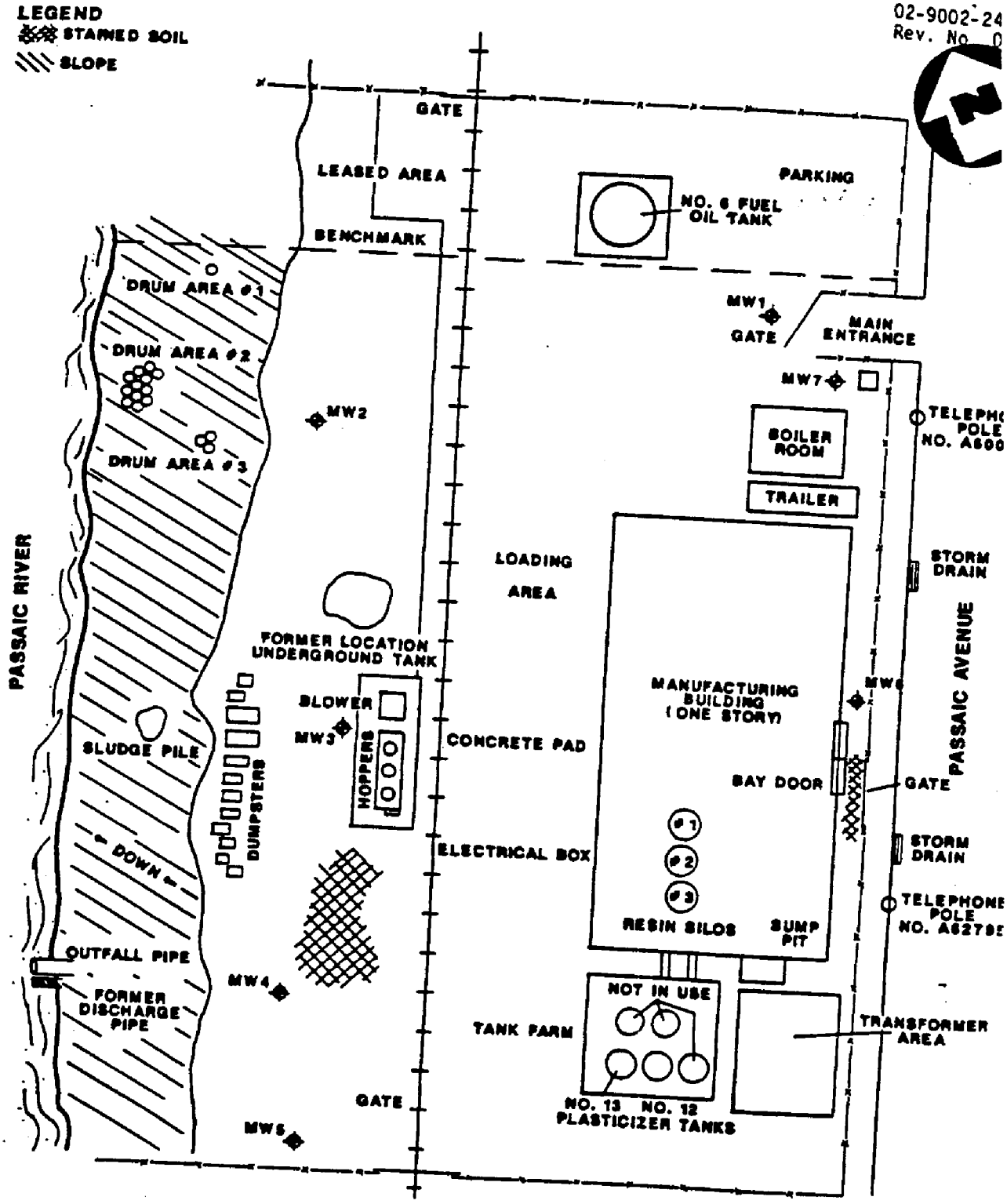
PART II: WASTE SOURCE INFORMATION

Franklin Plastics Corp. is located in Kearny, Hudson County, New Jersey. The facility is a compounder of polyvinyl chloride (PVC) pellets. Figures 1 and 2 provides a site location map and a site map, respectively.

[redacted] Area No. 1 is located off the southwest corner of the manufacturing building, approximately 10 feet west of the railroad tracks. The darkly stained soil occupies approximately 50 square yards; the specific hazardous chemical constituents, if any, are unknown. The area is unlined with no cover. Shallow groundwater exists at approximately 5 feet. The property is entirely fenced except along the Passaic River boundary, limiting the potential for direct contact.

[redacted] Area No. 2 is located along the eastern face of the manufacturing building, near the facility's bay door. The patches of dark soil encompass approximately 10 square yards and may be attributable to oil-contaminated steam discharged from the facility. The exact contaminants, if any, are unknown at present. The area is unlined with no cover. During an on-site reconnaissance performed by NUS Corp. Region 2 FIT on April 30, 1990, a drainage pathway was observed from this stained soil area across a public access area to Passaic Avenue, approximately 20 feet north of a storm drain maintained by the City of Kearny (Ref. No. 24).

Franklin Plastics Corp. is permitted to discharge noncontact cooling water under New Jersey Pollutant Discharge Elimination System (NJPDES) Permit No. NJ0002194. Franklin Plastics Corp.'s NJPDES Permit allows for a maximum discharge of 15,000 gallons per day (gpd) into the Passaic River via one outfall pipe (DSN001) located at the southwest corner of the property. Noncontact cooling water from the mixer jacket and roller mills, overflow from the cooling tower, and indoor trenches from the facility drain into a common open sump pit (Ref. No. 23). The sump pit is divided into two sections; the first section is used for settling, while the second section is discharged into the Passaic River via DSN001. The sump pit is reportedly emptied and cleaned out annually. Analytical data of NUS Corporation Region 2 FIT site inspection samples collected from the sump pit indicate the presence of high concentrations of inorganic contaminants and volatile organics, including chloroform, bromodichloromethane, ethylbenzene, and xylenes. The open sump pit is concrete-lined and is directly connected to the discharge pipe into the Passaic River (Ref. No. 24). Sample results from a Compliance Evaluation Inspection conducted on July 16, 1985 indicated that Franklin Plastics Corp. violated its NJPDES permit by exceeding limitations on temperature, chromium, and zinc (Ref. No. 32). A Compliance Evaluation Inspection conducted on July 13, 1989 found Franklin to be in violation of its NJPDES permit for not having reported maximum values on the discharge monitoring reports for the period May 1, 1988 to April 30, 1989 (Ref. No. 1). Franklin Plastics Corp. violated its NJPDES permit for the period ending in October 1988 for failure to submit a discharge monitoring report (Ref. No. 25).



SITE MAP

FRANKLIN PLASTICS CORP., KEARNY, N.J.

NOT TO SCALE

FIGURE 2

NUS CORPORATION

848120011

The tank farm area is located along the southern face of the manufacturing building. Two of the five plasticizer tanks are currently being utilized; each has a capacity of approximately 20,000 gallons. Tank No. 12 contains di-n-octyl phthalate; Tank No. 13 contains Jayflex 251. Both compounds are used as plasticizers as part of the manufacturing process. The storage tanks being used appear to be in fair condition; the three tanks not being used appear to be in poor condition. It is unknown whether they are completely empty (Ref. No. 24). Analytical results indicate soil contamination within the tank farm area (Ref. No. 13). The tank farm is surrounded by a concrete block wall and is unlined (Ref. No 24).

A Preliminary Assessment performed by the U.S. Environmental Protection Agency in January 1980 noted the presence of leaking and/or overflowing drums, the location of which was unspecified (Ref. No. 7). An NUS Corp. Region 2 FIT on-site reconnaissance in April 1990 discovered three areas of abandoned drums along the Passaic River, or western portion of the property. The drums were in poor condition; some drums were partially buried. Their contents appeared to be crumbled pieces of tile. The former operator of the property, Congoleum Corporation/Floor Covering Division, manufactured asphalt and/or vinyl tile on site from 1946 to 1974. Solidified sludge from the vinyl tile manufacturing process was found approximately 200 feet south of Drum Area No. 3 (Ref. No. 24).

PART III: PRE-EXISTENT ANALYTICAL DATA

Hart Associates collected four surface soil samples at Franklin Plastics Corp. on June 27, 1984, including one composite sample from the dust collector area and three discrete samples from the tank farm area. Samples were analyzed by Environmental Testing and Certification (ETC); each sample was found to contain very high levels of plasticizers, metals, and coal tar derivatives. Plasticizers, or phthalates, found include: bis(2-ethylhexyl) phthalate, butylbenzyl phthalate, dimethyl phthalate, and di-n-octyl phthalate. Priority Pollutant metals detected include: antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, thallium, and zinc. Certain coal tar derivatives, such as fluoranthene, phenanthrene, pyrene, and cyanide, were also reported at high concentrations in the four samples (Ref. No. 21, Table 1).

To allow Franklin to sell all capital stock to Spartech-Franklin, Inc., before completion of an Enviroment Clean-up Resposibility Act (ECRA) investigation, Franklin Plastics Corp. entered into an Administrative Consent Order (ACO) with the ECRA Enforcement Branch of the New Jersey Department of Environmental Protection (NJDEP) on February 14, 1986 (Ref. Nos. 13, 30). The ACO specified a timetable for completion of all ECRA requirements and provided for financial assurances prior to completion of the transaction. As part of the ECRA investigation, seven monitoring wells

were installed on site; core samples were collected by split spoon at a depth of 6 to 12 inches below ground surface and at a depth of 6 inches above groundwater. Six of the monitoring wells were placed downgradient of possible waste sources. The seventh well, monitoring well No. 1 (MW-1) was intended to provide background or upgradient data. All monitoring well core samples were analyzed for priority pollutants and petroleum hydrocarbons. The groundwater table was found to be perched above a less permeable layer of clayey alluvium (Ref. No. 13, pp. 2, 3).

A total of 33 soil borings were collected on site at varying depths, ranging from 6 to 74 inches. Most samples were analyzed for full priority pollutants, except for areas with compound-specific concerns. For example, the samples collected in the transformer area were analyzed for polychlorinated biphenyls (PCBs) and petroleum hydrocarbons only. Laboratory and field quality assurance/quality control procedures were submitted to the NJDEP with the original documents (Ref. No. 13, p. 2).

Franklin Plastics Corp. is currently in the process of implementing a second phase of sampling that has been required by the NJDEP (Ref. No. 14).

Groundwater Data

On June 24 and 25, 1987, Recon Systems, Inc. collected groundwater samples from the seven on-site monitoring wells. Analytical results of monitoring well sampling are summarized in Table 1. All groundwater samples were analyzed by ERCO Laboratories, Cambridge, Massachusetts. Bis(2-ethylhexyl) phthalate was detected in the field blank and laboratory method blank at 22 parts per billion (ppb) and 65 ppb, respectively. Di-butyl phthalate was detected in the laboratory method blank at 3.8 ppb. Concentrations of petroleum hydrocarbons detected in groundwater range from 0.8 ppm to 7.4 ppm, the highest concentration being detected in the sample collected from monitoring well MW-1. MW-1 was originally intended to serve as an upgradient sample location; however, detection of bis(2-ethylhexyl) phthalate, lead, and petroleum hydrocarbons in the MW-1 sample suggests the possibility that contamination may originate off site or the location may not be truly upgradient of all source areas (Ref. No. 13, p. 18).

Recon Systems, Inc. also collected a sample on September 24, 1987 from Franklin Plastic Corp.'s deep production well. No base neutrals were detected. A library search indicated the presence of four unknown phthalates at concentrations ranging from 0.008 to 0.017 mg/L. Petroleum hydrocarbons were found to be <0.5 mg/L in the sample (Ref. No. 31).

Soil Data

In July 1987, Recon Systems, Inc. collected 33 soil borings as part of ECRA-required sampling. Approximate soil sample locations are shown in Figure 3. Analytical results indicate that the soil

TABLE 1: COMPOUNDS DETECTED IN GROUNDWATER - JUNE 1987

Compounds	MW1	MW2	MW3	MW4	MW5	MW6	MW7
Acenaphthene	---	---	---	BLRL	---	---	---
Aroclor-1242	---	---	15	---	---	---	---
Bis(2-ethylhexyl) phthalate	21	BLRL	20	130	32	BLRL	BLRL
BenzoFluoranthene	BLRL	---	---	---	---	---	---
Chloroethane	---	---	---	---	13	---	---
Chrysene	BLRL	---	---	---	---	---	---
Di-n-butyl phthalate	---	---	---	---	BLRL	---	---
Fluorene	---	---	---	BLRL	---	---	---
2-Methylnaphthalene	BLRL	---	---	---	---	---	---
Naphthalene	BLRL	---	---	---	---	---	---
Pentachlorophenol	---	---	BLRL	BLRL	---	---	---
Arsenic	---	---	---	---	12	---	5.3
Copper	---	---	---	---	360	---	---
Lead	21	13	34	---	83	---	16
Mercury	---	---	0.3	---	---	---	---
Zinc	120	---	---	---	280	---	---

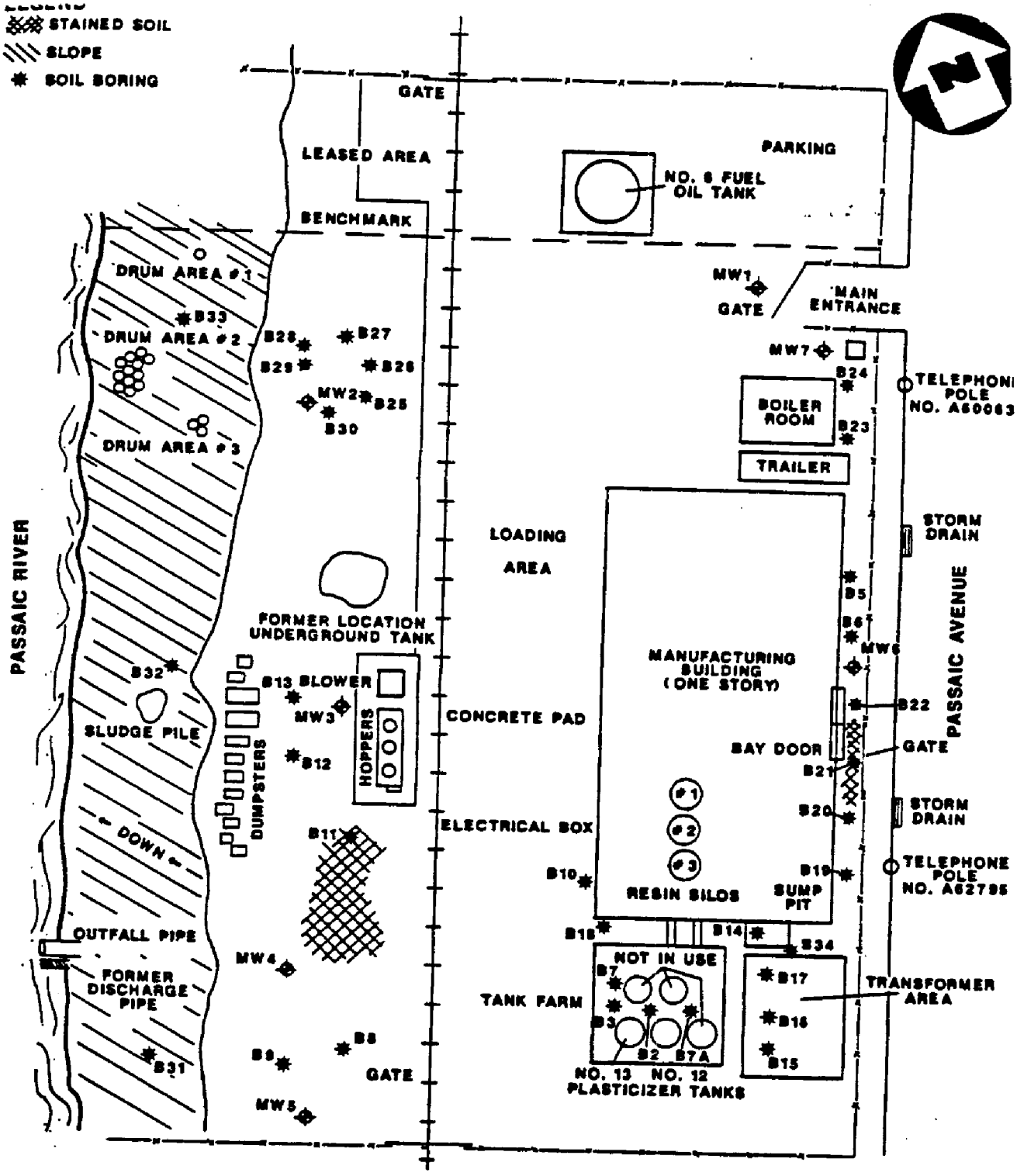
Note:

All data are reported in micrograms per liter (ug/L).
--- - Denotes not detected.
MW - Monitoring Well
BLRL - Detected below laboratory reporting limit.

(Ref. No 13)

84812014

02-9002-24-SI
Rev. No. 0



SAMPLE LOCATION MAP – JULY 1987

FRANKLIN PLASTICS CORP., KEARNY, N.J.

NOT TO SCALE

FIGURE 3

NUS CORPORATION

848120015

contains elevated levels of heavy metals, and volatile and semivolatile organic compounds. Tables 2and 3 summarize the substances detected in the soil samples. Concentrations of petroleum hydrocarbons found in the soil range from 105 ppm to 20,100 ppm, the highest concentration being detected in both B-8 and MW-4 samples. Soil samples B-1, B-2, and B-3 were analyzed by Accutest Laboratories, North Brunswick, New Jersey. The remaining soil samples were analyzed by ERCO Laboratories, Cambridge, Massachusetts (Ref. Nos. 13, pp. 18 and 22).

PART IV: SITE INSPECTION SAMPLE RESULTS

NUS Corporation Region 2 FIT conducted sampling at the Franklin Plastics Corp. site on June 5, 1990. A total of 16 environmental samples were collected and included three surface water, four sediment, and nine surface soil samples. Table 4 presents a summary of the analytical data. Figure 4 provides a Sample Location Map. Samples were analyzed under the Contract Laboratory Program (CLP) for Target Compound List (TCL) contaminants excluding cyanide. A complete presentation of the analytical results can be found in Reference Number 3.

Surface water and sediment samples were collected to determine whether a release of contaminants attributable to the facility to surface water has occurred. Surface soil and sediment samples were collected to determine whether a potential exists for direct contact with contaminants in the soil that are attributable to the facility or whether a potential exists for a release to the air via particulates attributable to the facility. Soil samples were collected at 0 to 6 inches to document these potential routes of contamination.

Sediment samples NJEP-SED3 and NJEP-SED4 were collected from two storm drains bordering Franklin Plastics Corp. on Passaic Avenue to determine whether storm drain contamination attributable to the facility has occurred. Surface soil samples NJEP-S1, NJEP-S2, and NJEP-S3 were collected to characterize the material in abandoned drums found on site along the flood area of the Passaic River; sample NJEP-S2 was a composite waste source sample collected from two of approximately 12 drums in Drum Area Number 2. Surface soil sample NJEP-S4 was collected near a solidified sludge pile near the Passaic River to characterize the waste source.

Seven monitoring wells are located on site; groundwater samples were not collected due to sufficient data available from previous sampling.

TABLE 2: SUMMARY OF ORGANIC COMPOUNDS DETECTED IN SOILS - JULY 1987

Compounds	Sample Location(s) Where Compounds Detected	Sample(s) With Highest Concentration	Highest Concentration (ug/kg
Acetone	MW3, MW7, B5, B31	MW7	4,000††
Benzene	MW3, MW4, MW5, B9 B11, B31, B32	MW3	130
Benzo Fluoranthene	B31	B31	990
Bis(2-ethylhexyl) phthalate	MW3, MW4, MW5, B1, B2† B3†, B7, B8, B9, B10, B11, B12, B13, B31, B32, B33	B10	26,000,000
Butylbenzyl phthalate	MW3, MW4, B8, B10 B31, B32, B33	MW3	220,000
Di-n-butyl phthalate	B2†, B3†	B3	301,000
1,1-Dichloroethene	MW1, MW3, B5, B11, B31, B32	MW3 B32	140
Di-n-octyl phthalate	MW3, MW4, B2, B3 B8, B9, B10, B13	B8	1,000,000
Fluoranthene	MW5, B9, B10, B31, B32, B33	MW5	29,000
Methylene Chloride	MW1, MW3, MW7, B5†, B31, B32†, B33†	MW7	4,600
N-Nitrosodiphenylamine	B12	B12	10,000
Phenanthrene	MW5, B9, B10, B11, B12 B13, B31, B32, B33	B10	19,000
Tetrachloroethane	MW1	MW1	140
Toluene	MW4, MW5 B8, B9	B8	290
1,1,1-Trichloroethane	MW5, B8, B9	MW5	450
Xylenes	MW4, MW5, B8	MW4	550

Notes:

All data are reported in micrograms per kilogram(ug/kg).
B - Soil boring
MW - Core soil sample collected during installation of monitoring well.
† - Analyte found in method blank.
†† - Detected below laboratory reporting limit.
(Ref. No. 13)

848120017

Table 3: INORGANIC SUBSTANCES DETECTED IN SOILS - JULY 1987

Substances	Sample Location(s) Where Substances Detected	Sample(s) With Highest Concentration	Highest Concentration (ug/kg)
Antimony	MW1, MW3, MW4, MW5, MW6 B6, B12, B31, B32, B33	B31	2,350,000
Arsenic	B6, B7	B7	1,300,000
Beryllium	MW6, B6, B32, B33	B32, B33	1,700
Cadmium	MW1, MW3, MW4, MW5, MW6, MW7, B3, B5, B6, B7, B8, B10, B11, B12, B31, B32, B33	B12	563,000
Chromium	B7, B33	B33	145,000
Copper	MW1, MW4, MW7, B10, B33	B33	2,070,000
Lead	MW1, MW4, MW6, MW7, B2 B5,B6, B7, B8, B9, B10, B31, B32, B33	B10	2,150,000
Mercury	B7, B10, B32	B10	4,800
Silver	B7	B7	7,300
Thallium	B5, B8, B12	B5	27,000
Zinc	MW1, MW7, B5, B7, B8, B12, B32, B33	B7	3,020,000

Notes:

All data are reported in micrograms per kilogram (ug/kg).
B - Soil boring
MW - Core soil sample collected during installation of monitoring well.

(Ref. No. 13)

848120018

SITE N) WELCH PLASTICS CORPORATION
TDD#: ... 24
SAMPLING DATE: 4/3/90
EPA CASE NO.: 04264 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA

VOLATILES	WJEP-SW1(MS/MSD)	WJEP-SW2	WJEP-SW3(DUP)	WJEP-SED1	WJEP-SED2	WJEP-SED3	WJEP-SED4	WJEP-S5	WJEP-S7	WJEP-S3	WJEP-S4
Sample ID No.	BDP54	BDP55	BDP56	BDP57	BDP58	BDP59	BDP60	BDP61	BDP62	BDP63	BDP64
Traffic Report No.	WATER	WATER	WATER	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SOIL	SOIL	SOIL	SOIL
Matrix	ug/L	ug/L	ug/L	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
Units	1	1	1	1	1	1	1	1	1	1	1
Dilution Factor	--	--	--	33	58	19	20	9	8	27	3
Percent Moisture											
Chloromethane											
Bromomethane											
Vinyl Chloride											
Chloroethane											
Methylene Chloride	J										
Acetone	J										
Carbon Disulfide											
1,1-Dichloroethene											
1,1-Dichloroethane											
Trans-1,2-Dichloroethene (total)											
Chloroform											
1,2-Dichloroethane	14	14	13								
2-Butanone											
1,1,1-Trichloroethane				29							
Carbon Tetrachloride											
Vinyl Acetate											
Bromodichloromethane											
1,2-Dichloropropane	J	J	J								
cis-1,3-Dichloropropene											
Trichloroethene											
Dibromochloromethane											
1,1,2-Trichloroethane											
Benzene											
trans-1,3-Dichloropropene											
Bromoform											
4-Methyl-2-Pentanone											
2-Hexanone				30							
Tetrachloroethene											
Toluene											
1,1,2,2-Tetrachloroethane											
Chlorobenzene											
Ethylbenzene						J					
Styrene											
Xylenes (total)						34					

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
I - estimated value
J - estimated value, compound present below CRDL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if Dilution Factor >1 and/or percent moisture >0%

84812001 9

SCC-3002-24-5.
Rev. No. 0

SITE NAME: FRANKLIN PLASTICS CORPORATION
FDD: 02-9002-24
SAMPLING DATE: 6/5/90
EPA CASE NO.: 14284 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

VOLATILES	NJEP-55	NJEP-56(MS/MSD)	NJEP-57	NJEP-58	NJEP-59(DUP)	NJEP-RIN1	NJEP-RIN2	NJEP-RIN3	NJEP-RIN4	NJEP-RIN5	NJEP-TRIP1
Sample ID No.	BDP65	BDP66	BDP67	BDP68	BDP69	BDP70	BDP71	BDP72	BDP73	BDP75	BDP74
Traffic Report No.	SOIL	SOIL	SOIL	SOIL	SOIL	WATER	WATER	WATER	WATER	WATER	WATER
Matrix	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/L	ug/L	ug/L	ug/L	ug.L	ug/L
Units	1	1	1	1	1	1	1	1	1	1	1
Dilution Factor	7	20	20	9	6	--	--	--	--	--	--
Percent Moisture											
Chloromethane											
Bromomethane											
Vinyl Chloride						J	J		J	J	
Chloroethane											
Methylene Chloride											
Acetone											
Carbon Disulfide		J								J	
1,1-Dichloroethene											
1,1-Dichloroethane											
Trans-1,2-Dichloroethene (total)											
Chloroform											
1,2-Dichloroethane											
2-Butanone						J	J	J	J	J	J
1,1,1-Trichloroethane											
Carbon Tetrachloride											
Vinyl Acetate											
Bromodichloromethane											
1,2-Dichloropropane											
cis-1,3-Dichloropropene											
Trichloroethene											
Dibromochloromethane											
1,1,2-Trichloroethane											
Benzene											
Trans-1,3-Dichloropropene											
Bromoform											
4-Methyl-2-Pentanone											
2-Hexanone											
Tetrachloroethene											
Toluene											
1,1,2,2-Tetrachloroethane								J			
Chlorobenzene											
Ethylbenzene											
Styrene											
Xylenes (total)											

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if dilution factor >1 and/or percent moisture >0%

Rev. No.

SITE NAME: FRANKLIN PLASTICS CORPORATION
TDD#: 02-9002-26
SAMPLING DATE: 4/5/90
EPA CASE NO.: 14264 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

SEMI-VOLATILES	RJEP-SW1(MS/MSD)	RJEP-SW2	RJEP-SW3(DUP)	RJEP-SED1	RJEP-SED2	RJEP-SED3	RJEP-SED4	RJEP-S1	RJEP-S2	RJEP-S3	RJEP-S4
Sample ID No.	BDP54	BDP55	BDP56	BDP57	BDP58	BDP59	BDP60	BDP61	BDP62	BDP63	BDP64
Traffic Report No.											
Matrix	WATER	WATER	WATER	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SOIL	SOIL	SOIL	SOIL
Units	ug/l	ug/L	ug/L	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
Dilution Factor/GPC Cleanup (Y)	1	1	1	1(MED)	33	1.2	7.2	1	1(MED)	1(MED)	50(MED)
Percent Moisture	--	--	--	33	50	19	20	9	8	27	7
Phenol											
bis(2-Chloroethyl)ether											
2-Chlorophenol											
1,3-Dichlorobenzene											
1,4-Dichlorobenzene											
Benzyl alcohol											
1,2-Dichlorobenzene											
2-Methylphenol											
bis(2-Chloroisopropyl)ether											
4-Methylphenol											
N-Nitroso-di-n-dipropylamine											
Hexachloroethane											
Nitrobenzene											
Isophorone											
2-Nitrophenol											
2,4-Dimethylphenol											
Benzoic acid											
bis(2-Chloroethoxy)methane											
2,4-Dichlorophenol											
1,2,4-Trichlorobenzene											
Naphthalene											
4-Chloroaniline											
Hexachlorobutadiene											
4-Chloro-3-Methylphenol											
2-Methylnaphthalene											
Hexachlorocyclopentadiene											
2,4,6-Trichlorophenol											
2,4,5-Trichlorophenol											
2-Chloronaphthalene											
2-Nitroaniline											
Dimethylphthalate											
Acenaphthylene											
2,6-Dinitrotoluene											
3-Nitroaniline											
Acenaphthene											
2,4-Dinitrophenol											
4-Nitrophenol											
Dibenzofuran											
2,4-Dinitrotoluene											
Diethylphthalate											
4-Chlorophenyl-phenyl ether											
Fluorene											
4-Nitroaniline											
4,6-Dinitro-2-methylphenol											
N-nitrosodiphenylamine											
4-Bromophenyl-phenyl ether											
Hexachlorobenzene											

NAME: FRANKLIN PLASTICS CORPORATION
02-9002-24
SAMPLING DATE: 6/5/90
EPA CASE #0.: 18204 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

SEMI-VOLATILES	RJEP-SB1(MS/MSD)	RJEP-SW2	RJEP-SW3(DUP)	RJEP-SED1	RJEP-SED2	RJEP-SED3	RJEP-SED4	RJEP-S1	RJEP-S2	RJEP-S3	RJEP-S4
Sample ID No.	BDP56	BDP55	BDP56	BDP57	BDP58	BDP59	BDP60	BDP61	BDP62	BDP63	BDP64
Traffic Report No.	WATER	WATER	WATER	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SOIL	SOIL	SOIL	SOIL
Matrix	ug/L	ug/L	ug/L	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
Units	1	1	1	1(MED)	13	7.2	7.2	1	E(MED)	(MED)	10(MED)
Dilution Factor/GPC Cleanup (Y)	--	--	--	33	58	19	29	9	8	27	7
Percent Moisture											
Pentachlorophenol				J	J	15000	4100	J			
Phenanthrene					J	2900	J	J			
Anthracene					J	J	J				
Di-n-butylphthalate				J	27000	19000	5600	500	31000	J	J
Fluoranthene				J	25000	18000	7000	J			
Pyrene				38000	470000 E	370000	710000	J			
Butylbenzylphthalate								2E000	11000000	610000	16000000
3,3'-Dichlorobenzidine				J	J	8000	J	J			
Benzo(a)anthracene				J	17000	13000	3500	J			
Chrysene				190000	13000000	1500000	1000000	1700	110000	J	J
bis(2-Ethylhexyl)phthalate				J	800000	37000	4E000	J			
Di-n-octylphthalate				JN	16000 ER	9500	4000 ER	JN			
Benzo(b)fluoranthene						8500 E					
Benzo(k)fluoranthene				J	J	7500	J	J			
Benzo(a)pyrene				J	J	4000	J	J			
Indeno(1,2,3-cd)pyrene					J	J	J				
Dibenz(a,h)anthracene				J	J	3600	J	J			
Benzo(g,h,i)perylene											

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRDL but above IDL
N - analysis did not meet EPA QA/QC
N - Presumptive evidence of the presence of the material
NA - analysis not required
Detection limits elevated if dilution factor >1 and/or percent moisture >0%

SITE NAME: FRANKLIN PLASTICS CORPORATION
TDD#: 02-9002-24
SAMPLING DATE: 6/5/90
EPA CASE NO.: 14204 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

SEMI-VOLATILES	RJEP-S5	RJEP-S6(MS/MSD)	RJEP-S7	RJEP-S8	RJEP-S9(DUP)	RJEP-RIN1	RJEP-RIN2	RJEP-RIN3	RJEP-RIN4	RJEP-RIN5	RJEP-TRIP1
Sample ID No.	BDP65	BDP66	BDP67	BDP68	BDP69	BDP7C	BDP71	BDP72	BDP73	BDP75	BDP76
Traffic Report No.	SOIL	SOIL	SOIL	SOIL	SOIL	WATER	WATER	WATER	WATER	WATER	WATER
Matrix	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Units	10(MED)	7.8	3(MED)	1	1	1	1	1	1	1	N/A
Dilution Factor/GPC Cleanup (Y)	7	20	20	9	6	--	--	--	--	--	N/A
Percent Moisture											
Phenol											
bis(2-Chloroethyl)ether											
2-Chlorophenol											
1,3-Dichlorobenzene											
1,4-Dichlorobenzene											
Benzyl alcohol											
1,2-Dichlorobenzene											
2-Methylphenol											
bis(2-Chloroisopropyl)ether											
4-Methylphenol											
N-Nitroso-di-n-dipropylamine											
Hexachloroethane											
Nitrobenzene											
Isophorone											
2-Nitrophenol											
2,4-Dimethylphenol											
Benzoic acid											
bis(2-Chloroethoxy)methane											
2,4-Dichlorophenol											
1,2,4-Trichlorobenzene											
Naphthalene											
4-Chloroaniline		J		560	J						
Hexachlorobutadiene											
4-Chloro-3-Methylphenol											
2-Methylnaphthalene											
Hexachlorocyclopentadiene				J	J						
2,4,6-Trichlorophenol											
2,4,5-Trichlorophenol											
2-Chloronaphthalene											
2-Nitroaniline											
Dimethylphthalate											
Acenaphthylene											
2,6-Dinitrotoluene				J							
3-Nitroaniline											
Acenaphthene											
2,4-Dinitrophenol		J		520	J						
4-Nitrophenol											
Dibenzofuran											
2,4-Dinitrotoluene		J		433	J						
Diethylphthalate											
4-Chlorophenyl-phenyl ether											
Fluorene											
4-Nitroaniline		J		556	J						
4,6-Dinitro-2-methylphenol											
N-nitrosodiphenylamine											
4-Bromophenyl-phenyl ether											
Hexachlorobenzene											

SITE: PHOENIX PLASTICS CORPORATION
TDD#: 02-9002-26
SAMPLING DATE: 6/5/90
EPA CASE NO.: 16204 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

SEMI-VOLATILES	RJEP-S5	RJEP-S6(MS/MSD)	RJEP-S7	RJEP-S8	RJEP-S9(DUP)	RJEP-RIN1	RJEP-RIN2	RJEP-RIN3	RJEP-RIN4	RJEP-RIN5	RJEP-TBLK1
Sample ID No.	BDP65	BDP66	BDP67	BDP68	BDP69	BDP70	BDP71	BDP72	BDP73	BDP75	BDP74
Traffic Report No.											
Matrix	SOIL	SOIL	SOIL	SOIL	SOIL	WATER	WATER	WATER	WATER	WATER	WATER
Units	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor/GPC Cleanup (Y)	10(MED)	7.8	3(MED)	1	1	1	1	1	1	1	N/A
Percent Moisture	7	20	20	9	6	--	--	--	--	--	N/A
Pentachlorophenol											BP
Phenanthrene		5000		4600	1300						PH
Anthracene		J		810	J						AN
Di-n-butylphthalate		J		J	J						DB
Fluoranthene		8000	J	4900	1900						FR
Pyrene		6700	J	3500	1400						PY
Butylbenzylphthalate	J	690000	170000	19000	14000						BB
3,3'-Dichlorobenzidine											DC
Benzo(a)anthracene		J		2000	830						BA
Chrysene		J	J	2600	1200						CH
bis(2-Ethylhexyl)phthalate	J	840000	1600000	240000	190000						BE
Di-n-octylphthalate		78000	J	3600	4100						DO
Benzo(b)fluoranthene		5300 ER	JN	3600 ER	1600 ER						BF
Benzo(k)fluoranthene											BK
Benzo(a)pyrene		J		1500	610						BP
Indeno(1,2,3-cd)pyrene		J		960	450						IP
Dibenz(a,h)anthracene		J		440	J						DA
Benzo(g,h,i)perylene		J		810	380						BP

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if Dilution Factor >1 and/or percent moisture >0%

SITE NAME: PHARMICO PLASTICS CORPORATION
TODO: 02-9002-24
SAMPLING DATE: 6/5/90
EPA CASE NO.: 14264 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

PESTICIDES	RJEP-S5	RJEP-S6(MS/MSD)	RJEP-S7	RJEP-S8	RJEP-S9(DUP)	RJEP-RIN1	RJEP-RIN2	RJEP-RIN3	RJEP-RIN4	RJEP-RIN5	RJEP-TBLK1
Sample ID No.	00P45	00P46	00P47	00P48	00P49	00P70	00P71	00P72	00P73	00P75	00P74
Traffic Report No.	SOIL	SOIL	SOIL	SOIL	SOIL	WATER	WATER	WATER	WATER	WATER	WATER
Matrix	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Units	100(MED)	200	1(MED)	5	5	1	1	1	1	1	N/A
Dilution Factor/GPC Cleanup (Y)	7	20	20	9	6	--	--	--	--	--	N/A
Percent Moisture											
alpha-BHC											NR
beta-BHC											NR
delta-BHC											NR
gamma-BHC (Lindane)											NR
Heptachlor											NR
Aldrin											NR
Heptachlor epoxide											NR
Endosulfan I											NR
Dieldrin											NR
4,4'-DDE											NR
Endrin											NR
Endosulfan II											NR
4,4'-DDD											NR
Endosulfan sulfate											NR
4,4'-DDT											NR
Methoxychlor											NR
Endrin ketone											NR
alpha-Chlordane											NR
gamma-Chlordane											NR
Toxaphene											NR
Aroclor-1016											NR
Aroclor-1221											NR
Aroclor-1232											NR
Aroclor-1242											NR
Aroclor-1248											NR
Aroclor-1254											NR
Aroclor-1260											NR

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if dilution factor >1 and/or percent moisture >0%

SITE Name: FRANKLIN PLASTICS CORPORATION
Proj: 07-9002-24
Sampling Date: 6/5/90
EPA Case No.: 14204 Lab: CONPHOENIX

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

PESTICIDES

Sample ID No.	RJEP-SB1(MS/MSD)	RJEP-SW2	RJEP-SW3(DUP)	RJEP-SED1	RJEP-SED2	RJEP-SED3	RJEP-SED4	RJEP-S1	RJEP-S2	RJEP-S3	RJEP-S4
Traffic Report No.	BDP54	BDP55	BDP56	BDP57	BDP58	BDP59	BDP60	BDP61	BDP62	BDP63	BDP64
Matrix	WATER	WATER	WATER	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SOIL	SOIL	SOIL	SOIL
Units	ug/L	ug/L	ug/L	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
Dilution Factor/GPC Cleanup (Y)	1	1	1	1(MED)	20	50	100	5	1(MED)	1(MED)	50(MED)
Percent Moisture	--	--	--	33	58	19	28	9	8	27	7
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											
4,4'-DDT											
Methoxychlor											
Endrin ketone											
Alpha-Chlordane											
Gamma-Chlordane											
Toxaphene											
Aroclor-1016											
Aroclor-1221											
Aroclor-1232											
Aroclor-1242											
Aroclor-1248											
Aroclor-1254											
Aroclor-1260											

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in lab blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
N - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if dilution factor >1 and/or percent moisture >0%

SITE NAME: FRANKLIN PLASTICS CORPORATION
EPA: 02-9002-24
SAMPLING DATE: 6/5/90
EPA CASE NO.: 14204
LAB NAME: VEGAS ANALYTICAL

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

INORGANICS Sample ID No. Traffic Report No. Matrix Units	NJEP-SW1(MS/MSD) MBCW75 WATER ug/L	NJEP-SW2 MBCW76 WATER ug/L	NJEP-SW3(DUP) MBCW77 WATER ug/L	NJEP-SED1 MBCW78 SEDIMENT mg/kg	NJEP-SED2 MBCW79 SEDIMENT mg/kg	NJEP-SED3 MBCW80 SEDIMENT mg/kg	NJEP-SED4 MBCW81 SEDIMENT mg/kg	NJEP-S1 MBCW82 SOIL mg/kg	NJEP-S2 MBCW83 SOIL mg/kg	NJEP-S3 MBCW84 SOIL mg/kg	NJEP-S4 MBCW85 SOIL mg/kg
Aluminum				5610	4040 E	5100	4640	9690	624	5970	1150
Antimony				21.2 E	49 E	J	J				J
Arsenic	J	J		J	60 E	B	26.7 E	12.5	J	3.2	J
Barium	J	J	J	338	1010 E	143	130	108	133	350	59.3
Beryllium					17.5 E						
Cadmium	12.2	12	13.1	29.2	202 E	5	5.7	1.8	29.2	2.5	2.9
Calcium	15500	15100	15000	9090	22600 E	14200	20500	4080	201000	59500	107000
Chromium				79.1	55.6 E	71.3	48.9	41.3	76.5	51.2	44
Cobalt			J	J	J	J	J	27.3	J	J	J
Copper	20.8	38.7	41.9	327	3200 E	227	103	162	23.5	81.8	21.8
Iron	171	176	175	9060	217000 E	41000	17400	140000	15200	15000	5080
Lead	3.4	4.4 E	10.7 E	200	810 E	596	644 E	70	299	191	133
Magnesium	J	J	J	2350	4090 E	6190	4430	6220	15100	9910	32500
Manganese	23.9	29.2	25	76.8	3900 E	273	160	798	150	244	85.6
Mercury				0.31	0.25 E	0.44	0.53	0.17	0.16	0.25	0.1
Nickel				36 E	39.8 E	30.9 E	33.6 E	58.7	45.7	92.5	40.5
Potassium	J	J	J	J	J	J	J	3090	J	J	J
Selenium					5.1 E	J	J				
Silver						J			36.9		
Sodium	9670	9490	9510	B	B	B	B	B	B	B	B
Thallium											
Vanadium				20.7	2000 E	33.7 E	30.6 E	34.4 E	21.7	32.9 E	J
Zinc	22.5	24.2	35	747	759 E	131	213	123	78.8	185	69.7

NOTES:
Blank space - compound analyzed for but not detected
E - estimated value
J - estimated value, compound present below CRDL but above IDL
B - analysis did not pass EPA QA/QC
NR - analysis not required

SITE NAME: [redacted] PLASTICS CORPORATION
SDG: 02-9002-24
SHIPPING DATE: 6/5/90
EPA REGION NO.: 10204
LAB NAME: VEGAS ANALYTICAL

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

INORGANICS	BJEP-55	BJEP-56(MS/MSD)	BJEP-57	BJEP-58	BJEP-59(DUP)	BJEP-RIN1	BJEP-RIN2	BJEP-RIN3	BJEP-RIN4	BJEP-RIN5	BJEP-TRIP1
Sample ID No.	MBCW86	MBCW87	MBCW88	MBCW89	MBCW90	MBCW91	MBCW92	MBCW93	MBCW94	MBCW95	N/A
Traffic Report No.	SOIL	SOIL	SOIL	SOIL	SOIL	WATER	WATER	WATER	WATER	WATER	N/A
Matrix	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Units											
Aluminum	1070	7450	1710	7410	6200						NR
Antimony	J	87.7 E	J								NR
Arsenic	2.6	14	5.8	6.6	12						NR
Barium	144	1990	106	140	116						NR
Beryllium											NR
Cadmium	55.5	70.2	5.3	1.4	1.1						NR
Calcium	109000	39400	140000	2550	3830	J	J			J	NR
Chromium	55.9	38.4	279	15.8	14.5			19.5			NR
Cobalt	J	J	J	J	J						NR
Copper	23.4	112	103	56.3	50.4						NR
Iron	4960	14700	8210	12900	10000			J		J	NR
Lead	148	2520 E	1430 E	204	90.8						NR
Magnesium	9080	3970	27300	2340	2250			J		J	NR
Manganese	383	292	140	337	340						NR
Mercury	0.2	0.12		0.16	0.11					0.2	NR
Nickel	16.3 E	20.4 E	134	13.4 E	12 E						NR
Potassium	J	J	J	J	J						NR
Selenium			J								NR
Silver											NR
Sodium	R	R	R	R	R	J	J	J	J	R	NR
Thallium											NR
Vanadium	13.3	41.4 E	31.3 E	23.8 E	21.3 E						NR
Zinc	115	870	1010	259	301	J			J	J	NR

NOTES:
Blank space - compound analyzed for but not detected
E - estimated value
J - estimated value, compound present below CRDL but above IDL
R - analysis did not pass EPA QA/QC
NR - analysis not required

848120028

08/14/90

SITE NAME: FRANKLIN PLASTICS CORPORATION
FDDH: 02-9002-24
SAMPLING DATE: 6/5/90
EPA CASE NO.: 14204 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

SEMI-VOLATILES											
Sample ID No.	NJEP-S5	NJEP-S6(MS/MSD)	NJEP-S7	NJEP-S8	NJEP-S9(DUP)	NJEP-RIN1	NJEP-RIN2	NJEP-RIN3	NJEP-RIN4	NJEP-RIN5	NJEP-TBLK1
Traffic Report No.	BDP65	BDP66	BDP67	BDP68	BDP69	BDP70	BDP71	BDP72	BDP73	BDP75	BDP74
Matrix	SOIL	SOIL	SOIL	SOIL	SOIL	WATER	WATER	WATER	WATER	WATER	WATER
Units	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor/GPC Cleanup (Y)	10(MED)	1.0	1(MED)	1	1	1	1	1	1	1	N/A
Percent Moisture	7	20	20	9	6	--	--	--	--	--	N/A
Phenol											
bis(2-Chloroethyl)ether											
2-Chlorophenol											
1,3-Dichlorobenzene											
1,4-Dichlorobenzene											
Benzyl alcohol											
1,2-Dichlorobenzene											
2-Methylphenol											
bis(2-Chloroisopropyl)ether											
4-Methylphenol											
N-Nitroso-di-n-dipropylamine											
Hexachloroethane											
Nitrobenzene											
Isophorone											
2-Nitrophenol											
2,4-Dimethylphenol											
Benzoic acid											
bis(2-Chloroethoxy)methane											
2,4-Dichlorophenol											
1,2,4-Trichlorobenzene											
Naphthalene											
4-Chloroaniline		J		550	J						
Hexachlorobutadiene											
4-Chloro-3-Methylphenol											
2-Methylnaphthalene											
Hexachlorocyclopentadiene				J	J						
2,4,6-Trichlorophenol											
2,4,5-Trichlorophenol											
2-Chloronaphthalene											
2-Nitroaniline											
Dimethylphthalate											
Acenaphthylene											
2,6-Dinitrotoluene				J							
3-Nitroaniline											
Acenaphthene											
2,4-Dinitrophenol		J		570	J						
4-Nitrophenol											
Dibenzofuran											
2,4-Dinitrotoluene		J		450	J						
Diethylphthalate											
4-Chlorophenyl-phenyl ether											
Fluorene											
4-Nitroaniline		J		550	J						
4,6-Dinitro-2-methylphenol											
N-nitrosodiphenylamine											
4-Bromophenyl phenyl ether											
Hexachlorobenzene											

848120029

Rev. No.

TIERRA-B-001001

SITE: RAMSEUR PLASTICS CORPORATION
TDD#: 04-9002-24
SAMPLING DATE: 6/5/90
EPA CASE NO.: 14204 LAB: COMPUCHEM

TABLE 4
SUMMARY OF SITE INSPECTION ANALYTICAL DATA
(cont'd)

SEMI-VOLATILES	RJEP-S5	RJEP-S6(MS/MSD)	RJEP-S7	RJEP-S8	RJEP-S9(DUP)	RJEP-RIN1	RJEP-RIN2	RJEP-RIN3	RJEP-RIN4	RJEP-RIN5	RJEP-TBLK1
Sample ID No.	BDP65	BDP66	BDP67	BDP68	BDP69	BDP70	BDP71	BDP72	BDP73	BDP75	BDP74
Traffic Report No.	SOIL	SOIL	SOIL	SOIL	SOIL	WATER	WATER	WATER	WATER	WATER	WATER
Matrix	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
Units	10(MED)	7.8	3(MED)	1	1	1	1	1	1	1	N/A
Dilution Factor/GPC Cleanup (Y)	7	20	20	9	6	--	--	--	--	--	N/A
Percent Moisture											
Pentachlorophenol											UR
Phenanthrene		5000		4600	1300						UR
Anthracene		J		810	J						UR
Di-n-butylphthalate		J		J	J						UR
Fluoranthene		8000	J	6900	8900						UR
Pyrene		4700	J	3500	1400						UR
Butylbenzylphthalate	J	690000	170000	19000	14000						UR
3,3'-Dichlorobenzidine										P	UR
Benzo(a)anthracene		J		2000	830						UR
Chrysene		J	J	7600	1200						UR
Bis(2-Ethylhexyl)phthalate	J	840000	1600000	240000	190000						UR
Di-n-octylphthalate		78000	J	3600	4100						UR
Benzo(b)fluoranthene		5100 EM	JM	3600 EM	3600 EM						UR
Benzo(k)fluoranthene											UR
Benzo(a)pyrene		J		1500	610						UR
Indeno(1,2,3-cd)pyrene		J		960	450						UR
Dibenz(a,h)anthracene		J		440	J						UR
Benzo(g,h,i)perylene		J		870	380						UR

NOTES:
Blank space - compound analyzed for but not detected
B - compound found in Lab Blank as well as sample, indicates possible/probable blank contamination
E - estimated value
J - estimated value, compound present below CRQL but above IDL
R - analysis did not pass EPA QA/QC
P - Presumptive evidence of the presence of the material
NR - analysis not required
Detection limits elevated if Dilution Factor >1 and/or percent moisture >90

PART V: HAZARD ASSESSMENT

GROUNDWATER ROUTE

1. **Describe the likelihood of a release of contaminant(s) to the groundwater as follows: observed, alleged, potential, or none. Identify the contaminant(s) detected or suspected, and provide a rationale for attributing the contaminant(s) to the facility.**

Analytical results from groundwater samples collected in June 1987 indicate a potential release of contaminants to the groundwater. Groundwater flow is reportedly westerly toward the Passaic River. Compounds detected in on-site monitoring wells downgradient of potential waste sources include: bis(2-ethylhexyl) phthalate (130 ppb), chloroethane (13 ppb), Aroclor-1242 (15 ppb), arsenic (12 ppb), copper (360 ppb), lead (83 ppb), and zinc (280 ppb). Franklin Plastics Corp. utilizes bis(2-ethylhexyl) phthalate as a plasticizer in its manufacturing process. Bis (2-ethylhexyl) phthalate, arsenic, copper, lead, and zinc were also among compounds detected in soil samples collected in July 1987 by Recon Systems, Inc.

Monitoring Well No. 1 (MW1) was originally intended to provide upgradient data; however, bis(2-ethylhexyl) phthalate, lead, and petroleum hydrocarbons were detected in the MW1 sample, suggesting that MW1 may not be truly upgradient to all waste source areas. Therefore, a release of contaminants to groundwater cannot be definitely concluded. Monitoring Well No. 6, located east of the manufacturing building and north of the stained soil area, may be a truer background or upgradient monitoring well.

Ref. Nos. 13, 24

2. **Describe the aquifer of concern; include information such as depth, thickness, geologic composition, permeability, overlying strata, confining layers, interconnections, discontinuities, depth to water table, groundwater flow direction.**

The aquifer of concern is the Brunswick Formation of the Newark Group which underlies the Newark area, including the City of Kearny. This formation consists of soft, reddish shale and red sandstone. In the vicinity of the site the Brunswick Formation is found at 50 feet below grade. The strata have generally been tilted northwestward, with the ridges trending northeastward. In the Newark area, the total thickness of these Triassic age rocks is estimated to be between 6,000 and 7,000 feet.

Groundwater movement and storage in the Brunswick Formation is primarily due to the extensive fracturing of the rocks of which it is composed. Though the cracks intersect so as to allow freedom of movement in all directions, water may be inhibited in traveling along certain paths by the size and capacity of the fractures.

In the vicinity of the site, the bedrock is found at approximately 50 feet below ground surface and is overlain by an estimated 30 feet of sand/silt, 10 feet of dense sand and gravel, and 5 feet of clayey silt, topped by 5 feet of urban fill. Sand and gravel are the most permeable of these geologic materials; the permeability associated with this soil type is 10^{-3} to 10^{-5} cm/sec. The water table is estimated to be at approximately 5 feet. Due to the close proximity of the Passaic River, which is tidal for its last 17 miles from Dundee Dam to Newark Bay, the possibility of salt water intrusion is increased. Groundwater flow is believed to be in a westerly direction toward the Passaic River.

Ref. Nos. 9, 12, 20, 21, 22, 33, 34

3. **Is a designated sole source aquifer within 3 miles of the site?**

Franklin Plastics Corp. is located in Kearny, Hudson County, New Jersey. There are no designated sole source aquifers within 3 miles of the site. The nearest sole source aquifer is the Buried Valley Aquifer System which is located more than 3 miles from the site.

Ref. Nos. 10, 11, 15

4. What is the depth from the lowest point of waste disposal/storage to the highest seasonal level of the saturated zone of the aquifer of concern?

The depth to the water table on site ranges between 3 and 8 feet. This water level may be tidally influenced due to its proximity to a tidal portion of the Passaic River. Based on analytical results of soil samples collected in July 1987 by Recon Systems, Inc., the lowest known point of waste disposal is at 6 feet, 2 inches below ground surface. Petroleum hydrocarbons were detected at a concentration of 123 ppm in a boring collected at this depth east of the facility's boiler room. Analytical data also indicate the presence of contaminants at 6 inches above groundwater at various sampling locations; therefore the difference between depth of waste disposal and the depth to water table is less than 6 inches.

Ref. Nos. 2, 4, 9, 13, 15

5. What is the permeability value of the least permeable continuous intervening stratum between the ground surface and the aquifer of concern?

Water table conditions exist in the layer of urban fill, which is approximately 5 feet below grade. The permeability associated with these deposits is 10^{-3} to 10^{-5} cm/sec.

Ref. Nos. 9, 12, 33, 34

6. What is the net precipitation for the area?

Normal annual precipitation for the area is approximately 44 inches. The mean annual lake evaporation for the area is 32 inches. Therefore, the net precipitation for the area is estimated to be 12 inches.

Ref. No. 12

7. Identify uses of groundwater within 3 miles of the site (i.e., private drinking source, municipal source, commercial, industrial, irrigation, unusable).

Groundwater within a 3-mile radius of the site is not used as a drinking water source. Portions of the Towns of Belleville, Bloomfield, East Orange, Harrison, Newark, and North Arlington are included within the 3-mile vicinity of Franklin Plastics Corporation in Kearny, New Jersey. All of these towns are served by the Wanaque Reservoir in Passaic County, New Jersey.

Kearny does not authorize drinking water wells; however, industrial wells are present and are permitted by the New Jersey Department of Environmental Protection (NJDEP). The NJDEP monitors these wells. Cross-connections prevent the industrial well water from entering the Kearny drinking water supply system.

Ref. Nos. 15, 16, 17, 18

8. What is the distance to and depth of the nearest well that is currently used for drinking or irrigation purposes?

Groundwater is not used for potable or irrigational purposes within a 3-mile radius of the site.

Ref. Nos. 15, 16, 17, 18

9. Identify the population served by the aquifer of concern within a 3-mile radius of the site.

No one is served by the aquifer of concern within a 3-mile radius of the site. The site is located in Kearny, New Jersey, which receives its potable water from the Wanaque Reservoir located in Passaic County, New Jersey.

Ref. Nos. 10, 15, 16, 17

SURFACE WATER ROUTE

10. Describe the likelihood of a release of contaminant(s) to surface water as follows: observed, alleged, potential, or none. Identify the contaminant(s) detected or suspected, and provide a rationale for attributing the contaminants to the facility.

There is potential for a release of contaminants from the site to surface water. Franklin Plastics Corp. retains a New Jersey Pollutant Discharge Elimination System (NJPDES) Permit for one thermal noncontact cooling water discharge into the Passaic River. The facility's open sump pit collects noncontact cooling water from the mixer jacket and roller mills, overflow from the cooling tower, and drainage from indoor trenches. The sump pit is connected to the outfall pipe discharging into the Passaic River.

Analysis of samples obtained by NUS Corp. Region 2 FIT on June 5, 1990 indicated the presence of fluoranthene (27,000 ug/kg), pyrene (25,000 ug/kg), butylbenzyl phthalate (estimated-470,000 ug/kg), bis(2-ethylhexyl) phthalate (13,000,000 ug/kg), chrysene (17,000 ug/kg), and di-n-octyl phthalate (800,000 ug/kg) in sediment sample number NJEP-SED2 collected from the facility's sump pit. These compounds were not detected in surface water samples NJEP-SW1, -SW2, and -SW3. Surface water sample NJEP-SW1 was collected directly from the facility's discharge pipe while NJEP-SW2 and -SW3 were collected from the sump pit.

Metals that may be of concern that were detected in sample numbers NJEP-SW1, -SW2, and -SW3 include: cadmuim (12.2 ug/L), copper (28.8 ug/L), lead (3.4 ug/L), manganese (23.9 ug/L), and zinc (22.5 ug/L). Values stated are for concentrations of contaminant at the discharge point. These metals were also detected in the sediment sample collected from the sump pit at estimated concentrations of: cadmium (202 mg/kg), copper (3,280 mg/kg), lead (818 mg/kg), manganese (3,980 mg/kg), and zinc (759 mg/kg). This suggests a possible release of these contaminants to the Passaic River via the discharge outfall; however, since the chemical constituents of the noncontact cooling water prior to entering the manufacturing plant are unknown, a release cannot be postively concluded.

A portion of the property is occasionally flooded by high tides from the Passaic River. An NUS Corp. Region 2 FIT on-site reconnaissance performed on April 30, 1990 noted the presence of a solidified sludge pile and abandoned drums containing tile-like pieces along the tidal portion of the property. There is a potential for any contaminants present in these areas to be released directly to surface water during high tides. Analytical results from samples collected from the sludge pile and three drum areas on June 5, 1990 indicate the presence of di-n-butyl phthalate (31,000 ug/kg), butylbenzyl phthalate (16,000,000 ug/kg), and bis (2-ethylhexyl) phthalate (110,000 ug/kg).

Ref. Nos. 3, 20, 23, 24

11. Identify and locate the nearest downslope surface water. If possible, include a description of possible surface drainage patterns from the site.

The Passaic River is the nearest downslope surface water; it is located approximately 400 feet west of Franklin's manufacturing building and forms the western border of the site. During an NUS Corp. Region 2 FIT on-site reconnaissance performed on April 30, 1990, no obvious drainage patterns were observed; however, drums and the sludge pile are located approximately 30 to 60 feet from the Passaic River in an area that is occasionally flooded.

Ref. Nos. 15; 24, p 12

12. What is the facility slope in percent? (Facility slope is measured from the highest point of deposited hazardous waste to the most downhill point of the waste area or to where contamination is detected.)

The facility slope is estimated to be less than 3 percent.

Ref. Nos. 15, 24

13. What is the slope of the intervening terrain in percent? (Intervening terrain slope is measured from the most downhill point of the waste area to the probable point of entry to surface water.)

The intervening terrain average slope is estimated to be less than 3 percent.

Ref. Nos. 15, 24

14. What is the 1-year 24-hour rainfall?

The 1-year 24-hour rainfall in the area of the site is 3 inches.

Ref. No. 12

15. What is the distance to the nearest downslope surface water? Measure the distance along a course that runoff can be expected to follow.

The Passaic River is the nearest downslope surface water, which is approximately 30 feet from the nearest waste source area, the abandoned drums. Occasionally during high tides, the drum areas are flooded. The sludge pile is approximately 50 feet from the Passaic river, also in the area that is occassionally flooded. Both the drum areas and sludge pile have no containment structures.

Ref. Nos. 15; 24, p. 12

16. Identify uses of surface waters within 3 miles downstream of the site (i.e., drinking, irrigation, recreation, commercial, industrial, not used).

Surface waters within 3 miles downstream of the site are designated for secondary recreational purposes, maintenance and migration of fish populations, migration of diadromous fish, and maintenance of wildlife.

Ref. Nos. 15, 19

17. Describe any wetlands, greater than 5 acres in area, within 2 miles downstream of the site. Include whether it is a freshwater or coastal wetland.

There are no wetlands greater than 5 acres in area within 2 miles downstream of the site.

Ref. Nos. 15, 26

18. Describe any critical habitats of federally listed endangered species within 2 miles of the site along the migration path.

Except for occasional transient species, such as the peregrine falcon (Falco peregrinus), no federally listed endangered species are known to exist within 2 miles of the site along the migration path.

Ref. Nos. 15, 27

19. What is the distance to the nearest sensitive environment along or contiguous to the migration path (if any exist within 2 miles)?

There are no wetlands or critical habitats of federally listed endangered species along or contiguous to the migration path.

Ref. Nos. 15, 26, 27

20. Identify the population served or acres of food crops irrigated by surface water intakes within 3 miles downstream of the site and the distance to the intake(s).

The site is located in a mixed industrial/residential section of Kearny, New Jersey. The Passaic River is the nearest surface water body and forms the western border of the site. The Passaic River is not used for potable or irrigational purposes within 3 miles downstream of the probable point of entry.

Ref. Nos. 15, 18, 19, 24

21. What is the state water quality classification of the water body of concern?

The state water quality classification of the Newark portion of the Passaic River is SE3. This classification indicates that its designated uses are: secondary contact recreation, maintenance and migration of fish populations, migration of diadromous fish, maintenance of wildlife, and any other reasonable uses.

In Franklin Plastics Corp's New Jersey Pollutant Discharge Elimination System (NJPDES) Permit, this portion of the Passaic River is classified as TW-3, which designates the waters as used primarily for navigational, not recreational, purposes.

Ref. Nos. 19, 20, 23

22. Describe any apparent biota contamination that is attributable to the site.

A Preliminary Assessment performed by Hart Associates in June 1984 identified an area of stressed vegetation near the air pollution control units. An area devoid of vegetation also exists near the facility's east bay door on Passaic Avenue.

Ref. Nos. 21, 24

AIR ROUTE

23. Describe the likelihood of a release of contaminant(s) to the air as follows: observed, alleged, potential, none. Identify the contaminant(s) detected or suspected, and provide a rationale for attributing the contaminant(s) to the facility.

Based on analytical results from surface soil samples collected during the NUS FIT 2 site inspection on June 5, 1990, there is a potential for release of airborne particulates from the site. These samples were collected at depths of 0-6 inches below ground surface. The compounds detected are known to be major ingredients in the facility's manufacturing process. High concentrations of di-n-butyl phthalate (31,000 ug/kg), butylbenzyl phthalate (16,000,000 ug/kg), bis(2-ethylhexyl) phthalate (1,600,000 ug/kg), and di-n-octyl phthalate (78,000 ug/kg) were detected in these surface soil samples.

Ref. No. 3

24. What is the population within a 4-mile radius of the site?

Approximately 569,000 people reside within a 4-mile radius of the site.

Ref. No. 28

FIRE AND EXPLOSION

25. Describe the potential for a fire or explosion to occur with respect to the hazardous substance(s) known or suspected to be present on site. Identify the hazardous substance(s) and the method of storage or containment associated with each.

There is little potential for a fire or explosion to occur with respect to the known hazardous substances on site. The phthalates detected on site are not highly flammable.

Ref. No. 13

26. What is the population within a 2-mile radius of the hazardous substance(s) at the facility?

Approximately 196,200 people reside within a 2-mile radius of the hazardous substance(s) at the facility.

Ref. No. 28

DIRECT CONTACT/ON-SITE EXPOSURE

27. Describe the potential for direct contact with hazardous substance(s) stored in any of the waste units on site or deposited in on-site soils. Identify the hazardous substance(s) and the accessibility of the waste unit.

There is potential for direct contact with hazardous substances that remain on site. Franklin Plastic Corp.'s premises occupy approximately 8 acres between the Passaic River and Passaic Avenue. The property is fenced from its gate entrance to its boundary on the Passaic River; however, an NUS Corp. Region 2 FIT on-site reconnaissance of April 30, 1990 observed soil run-off from a stained soil area east of the manufacturing building. The stained soil area is located along Passiac Avenue. The surface run-off pattern was observed to extend from the stained soil area, across an obvious public access area, to Passaic Avenue and two storm drains. Surface soil samples were collected by NUS Corp. Region 2 FIT on June 5, 1990 from the stained soil area, from the run-off pathway outside the fence, and from two storm drains on Passaic Ave. Butylbenzyl phthalate (170,000 ug/kg) and bis(2-ethylhexyl) phthalate (1,600,000 ug/kg) were detected in the surface soil sample collected from the stained soil area. These same two contaminants were detected in the sample collected in the run-off pathway (19,000 ug/kg and 240,000 ug/kg, respectively) and in the samples collected from the storm drains.

Franklin Plastics Corp. is an active facility. The detection of high concentrations of phthalates in surface soil samples indicates that there is the potential for direct contact by on-site workers. There is also a potential for soil contamination on adjacent properties.

Ref. Nos. 3, 7, 24

28. How many residents live on a property whose boundaries encompass any part of an area contaminated by the site?

Franklin Plastics Corp. is located in an industrial/commercial portion of Kearny, New Jersey. No residents live on a property whose boundaries encompass any part of areas known to be contaminated by the site.

Ref. No. 24

29. What is the population within a 1-mile radius of the site?

Approximately 63,500 people reside within a 1-mile radius of the site.

Ref. No. 28

PART VI: ACTUAL HAZARDOUS CONDITIONS

Analyses of soil samples collected from the Franklin Plastics Corp. site indicate above-background contamination that is attributable to the facility (Ref. No. 3). Franklin Plastics Corp. utilizes phthalates such as bis(2-ethylhexyl) phthalate, butylbenzyl phthalate, di-n-butyl phthalate, and di-n-octyl phthalate as plasticizers in its manufacturing processes. High concentrations of these four phthalates were detected in soil samples collected by Recon Systems, Inc. in July 1987 and in samples collected during the June 5, 1990 NUS Corp. Region 2 FIT site inspection (Ref. Nos. 3, 13). Tables 2 and 3 summarize the compounds detected during the July 1987 sampling event. Table 4 summarizes compounds detected during the June 1990 sampling event.

There is evidence suggesting a release of a substance of concern from the facility to the groundwater. Table 1 presents the organic and inorganic compounds detected in groundwater from the sampling analyses report submitted by Recon Systems, Inc. in October 1987. Bis (2-ethylhexyl) phthalate was detected in all groundwater samples; the highest concentration being 130 ug/L detected in Monitoring Well No. 4. Bis(2-ethylhexyl) phthalate was also detected in the trip blank and the laboratory method blank; therefore, a release of this compound cannot be definitely concluded. Di-n-butyl phthalate was present in Monitoring Well No. 5 at a concentration of 2.1 ug/L. Groundwater is not used for potable or irrigational purposes within a 3-mile radius of the site (Ref. No. 13).

A Preliminary Assessment performed by Hart Associates in September 1984 noted an area of stressed vegetation east of the manufacturing building (Ref. No.21). An NUS Corp. Region 2 FIT on-site reconnaissance on April 30, 1990 also observed this area of stressed vegetation in addition to another area of stressed vegetation west of the facility's air pollution control unit (Ref. No. 24). A surface soil sample collected on June 5, 1990 from the area near the air pollution control unit indicated elevated levels of butylbenzyl phthalate, bis(2-ethylhexyl) phthalate, and di-n-octyl phthalate (Ref. No. 3).

There is documented contamination of a storm drain. Sediment samples collected on June 5, 1990 from two storm drains on Passaic Ave. adjacent to Franklin Plastics Corp. indicate the presence of elevated levels of butylbenzyl phthalate, bis(2-ethylhexyl)phthalate, and di-n-octyl phthalate. Phthalates are utilized as plasticizers in the facility's manufacturing process. Surface soil samples collected from the stained soil on the east side of the manufacturing building (NJEP-S7) and from the surface run-off (NJEP-S8 and -S9) also indicate the presence of butylbenzyl phthalate and bis (2-ethylhexyl) phthalate. In all likelihood, surface soil from Franklin Plastics Corp. leaves the site via the observed run-off pathway and ultimately enters the two adjacent storm drains on Passaic Avenue.

PART VII: SITE SUMMARY AND RECOMMENDATIONS

Franklin Plastics Corp. (Franklin), is located along the Passaic River in Kearny, New Jersey. In February 1986, an Administrative Consent Order from the New Jersey Department of Environmental Protection (NJDEP) allowed the transfer of company stock to Spartech-Franklin, Inc., prior to the completion of an Environmental Clean-up Responsibility Act (ECRA) study. Franklin Plastics Corp. is a compounder of polyvinyl chloride (PVC) pellets. The site occupies approximately 8 acres in a mixed industrial/commercial portion of Kearny; 1 acre of the property is leased to Franklin. The site is bounded on the west by the Passaic River, to the east by Passaic Avenue, and the north and south by industrial/commercial businesses. The property is fenced where it is not bordered by the Passaic River. Approximately 1,300 people reside within 0.25 mile of the site.

Franklin has been a privately owned, active manufacturing facility under this name from 1976 to the present. Congoleum Corporation/Floor Covering Division owned the property from 1946 to 1974; Congoleum manufactured asphalt and/or vinyl tile on the premises. Franklin receives plastic resin as a solid or powder, then adds pigment and varying amounts of plasticizer to the customer's specifications. The final product is PVC pellets, which are sold to individual customers for conversion into end products. A dust collector and a combined ventilation/exhaust system operate continuously. The free dust is removed to outdoor bins and is recycled back into the process.

In August 1985, NJDEP issued Franklin a New Jersey Pollutant Discharge Elimination System (NJPDES) permit for one surface water discharge of noncontact cooling water. Overflow from the cooling tower, cooling water from the mixer jacket and roller mills, and drainage from indoor trenches are collected in a concrete-lined open sump pit along the south wall of the manufacturing building. The sump pit is divided into two sections; the first section is for settling while the second section discharges to the Passaic River under NJPDES Permit No. NJ0002194. The sump pit is reported to be cleaned annually. In September 1985, NJDEP, Division of Water Resources inspected Franklin and found samples of the facility's effluent to exceed permit limitations for temperature, chromium, and zinc. In September 1989, NJDEP cited Franklin in a Discharge Surveillance Report for failure to report maximum values on its Discharge Monitoring Reports for the period May 1, 1988 to April 30, 1989.

In 1987, Franklin underwent groundwater and soil sampling required under the ECRA. Franklin's sampling results reported by Recon Systems, Inc. indicated the widespread presence of phthalates, polynuclear aromatic hydrocarbons (PAHs), and metals such as lead and cadmium. Throughout the fill, coal cinders and ash were found; these materials are indicated as a possible source for the detected PAHs. Phthalates were most often detected in areas associated with storage and loading of plasticizer oils and in areas in which fugitive dust is likely to settle. Phthalates detected above ECRA Cleanup Guidelines include: bis(2-ethylhexyl) phthalate, di-n-butyl phthalate, di-n-octyl phthalate, and butylbenzyl phthalate. Metals present in soil and/or groundwater include: antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, silver, thallium, and zinc.

PART VII: SITE SUMMARY AND RECOMMENDATIONS (CONT'D)

Franklin is currently in the process of implementing a second phase of ECRA sampling. Recon Systems, Inc. is performing the installation of three deep production wells and approximately six additional soil borings. Data from this sampling were to be presented to the NJDEP by August 22, 1990. A Clean-up Plan is also to be submitted at this time, provided that it is determined that no further sampling is required.

Groundwater analytical data from the ECRA study suggest a release of contaminants to the groundwater. The potential for a surface water release is also possible via the facility's discharge pipe and flooding of waste areas along the Passaic River. Franklin Plastics Corp. is situated along a tidal portion of the Passaic River; the river's uses include secondary contact recreation and maintenance of fish and wildlife populations. Due to the saline content of this portion of the Passaic River, surface water is not used for potable or irrigational purposes with 3 miles downstream of the site. Groundwater is not used for potable purposes, nor are there any sole source aquifers, within 3 miles of the site. The City of Kearny receives its water from the Wanaque Reservoir in Passaic County, New Jersey. No wetlands or critical habitats of federally listed endangered species exist along the migration pathway.

Due to high concentrations of contaminants detected in surface soil samples, the potential exists for a release of contaminants to air via particulates. Approximately 1,300 people reside within 0.25 mile of the site. The potential also exists for contamination to extend to adjacent properties. The possibility of both on-site worker exposure and direct contact exists due to the detection of high concentrations of contaminants in surface soil samples. Based on the potential for a contaminant release to the air and for contamination extending beyond the site boundaries, Franklin Plastics Corp. site is recommended for a **LISTING SITE INSPECTION (LSI)**. It is suggested that the LSI include: sampling of adjacent properties to determine if soil contamination extends to neighboring facilities, and particulate sampling to determine if a release to air has occurred.

Three abandoned drum areas and an area near a solidified sludge pile along the Passaic River were sampled on June 5, 1990; this area is occasionally flooded by high tides (Ref. No. 24, p. 12). Di-n-butyl phthalate, butylbenzyl phthalate, and bis(2-ethylhexyl) phthalate were detected at elevated levels in these samples (Ref. No. 3).

A condenser blowdown drainage pathway was observed running parallel to the southwest corner of the manufacturing building and the tank farm. Analytical results from samples collected from the drainage pathway by NUS Corp. Region 2 FIT in June 1990 indicate elevated levels of butylbenzyl phthalate and bis(2-ethylhexyl) phthalate.

No other actual hazardous conditions pertaining to human or environmental contamination have been documented. Specifically:

- Contamination has not been documented either in organisms in a food chain leading to humans or in organisms directly consumed by humans.
- There have been no documented observed incidents of direct physical contact with hazardous substances at the facility involving a human being (not including occupational exposure) or a domestic animal.
- There have been no documented incidents of damage to fauna (e.g., fish kill) that can be attributed to the hazardous material at the facility.
- A fire marshall has not indicated that the facility presents a significant threat, nor is there a demonstrated threat based on field observation.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 15 2003

GENERAL NOTICE LETTER
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Bradley Buechler, President
Franklin-Burlington Plastics Inc.
113 Passaic Ave.
Kearny, New Jersey 07032

RE: Diamond Alkali Superfund Site
Notice of Potential Liability for
Response Actions in the Lower Passaic River, New Jersey

Dear Mr. Buechler:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release and/or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9601 et seq. Accordingly, EPA is seeking your cooperation in an innovative approach to environmental remediation and restoration activities for the Lower Passaic River.

EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the six-mile stretch of the river, known as the Passaic River Study Area, which is part of the Diamond Alkali Superfund Site ("Site") located in Newark, New Jersey. Based on the results of previous CERCLA remedial investigation activities and other environmental studies, including a reconnaissance study of the Passaic River conducted by the United States Army Corps of Engineers ("USACE"), EPA has further determined that contaminated sediments and other potential sources of hazardous substances exist along the entire 17-mile tidal reach of the Lower Passaic River. Thus, EPA has decided to expand the Study to include the areal extent of contamination to which hazardous substances from the six-mile stretch were transported; and those sources from which hazardous substances outside the six-mile stretch have come to be located within the expanded Study Area.

By this letter, EPA is notifying Franklin-Burlington Plastics Inc. ("Franklin-Burlington") of its potential liability relating to the Site pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a). Under CERCLA, potentially responsible parties ("PRPs") include current and past owners of a facility, as well as persons who arranged for the disposal or treatment of hazardous substances at the Site, or the transport of hazardous substances to the Site.

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In recognition of our complementary roles, EPA has formed a partnership with USACE and the New Jersey Department of Transportation-Office of Maritime Resources ("OMR") ["the governmental partnership"] to identify and to address water quality improvement, remediation, and restoration opportunities in the 17-mile Lower Passaic River. This governmental partnership is consistent with a national Memorandum of Understanding ("MOU") executed on July 2, 2002 between EPA and USACE. This MOU calls for the two agencies to cooperate, where appropriate, on environmental remediation and restoration of degraded urban rivers and related resources. In agreeing to implement the MOU, the EPA and USACE will use their existing statutory and regulatory authorities in a coordinated manner. These authorities for EPA include CERCLA, the Clean Water Act, and the Resource Conservation and Recovery Act. The USACE's authority stems from the Water Resources Development Act ("WRDA"). WRDA allows for the use of some federal funds to pay for a portion of the USACE's approved projects related to ecosystem restoration.

For the first phase of the Lower Passaic River Project, the governmental partners are proceeding with an integrated five- to seven-year study to determine an appropriate remediation and restoration plan for the river. The study will involve investigation of environmental impacts and pollution sources, as well as evaluation of alternative actions, leading to recommendations of environmental remediation and restoration activities. This study is being conducted by EPA under the authority of CERCLA and by USACE and OMR, as local sponsor, under WRDA. EPA, USACE, and OMR are coordinating with the New Jersey Department of Environmental Protection and the Federal and State Natural Resource Trustee agencies. EPA, USACE, and OMR estimate that the study will cost approximately $20 million, with the WRDA and CERCLA shares being about $10 million each. EPA will be seeking its share of the costs of the study from PRPs.

Based on information that EPA evaluated during the course of its investigation of the Site, EPA believes that hazardous substances were being released from Franklin-Burlington's facility located at 113 Passaic Avenue in Kearny, New Jersey, into the Lower Passaic River. Hazardous substances, pollutants and contaminants released from the facility into the river present a risk to the environment and the humans who may ingest contaminated fish and shellfish. Therefore, Franklin-Burlington may be potentially liable for response costs which the government may incur relating to the study of the Lower Passaic River. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

Enclosed is a list of the other PRPs who have received Notice letters. This list represents EPA's findings on the identities of PRPs to date. We are continuing efforts to locate additional PRPs who have released hazardous substances, directly or indirectly, into the Passaic River. Inclusion on, or exclusion from, the list does not constitute a final determination by EPA concerning the liability of any party for the release or threat of release of hazardous substances at the Site. Be advised that notice of your potential liability at the Site is being forwarded to all parties on this list.

We request that you consider becoming a "cooperating party" for the Lower Passaic River

Project. As a cooperating party, you, along with many other such parties, will be expected to fund EPA's share of the study costs. Upon completion of the study, it is expected that CERCLA and WRDA processes will be used to identify the required remediation and restoration programs, as well as the assignment of remediation and restoration costs. At this time, the commitments of the cooperating parties will apply only to the study. For those who choose not to cooperate, EPA may apply the CERCLA enforcement process, pursuant to Sections 106 (a) and 107(a) of CERCLA, 42 U.S.C. §9606(a) and §9607(a) and other laws.

Pursuant to CERCLA Section 113(k), EPA must establish an administrative record that contains documents that form the basis of EPA's decision on the selection of a response action for a site. The administrative record files, which contain the documents related to the response action selected for this Site are located at EPA's Region 2 office (290 Broadway, New York) on the 18th floor. You may call the Records Center at (212) 637-4308 to make an appointment to view the administrative record for the Lower Passaic River Project.

EPA will be holding a meeting with all PRPs on October 29, 2003 at 10:00 AM in Conference Room 27A at the Region 2 office. At that meeting, EPA will provide information about the actions taken to date in the Lower Passaic River, as well as plans for future activities. After the presentation, PRPs will be given the opportunity to caucus, and EPA will return to answer any questions that might be generated during the private session. Please be advised that due to increased security measures, all visitors need to be registered with the security desk in the lobby in order to gain entry to the office. In order to ensure a smooth arrival, you will need to provide EPA with a list of attendees no later than October 15, 2003.

EPA recommends that the cooperating parties select a steering committee to represent the group's interest as soon as possible, since EPA expects a funding commitment for the financing of the CERCLA share of the $20 million study by mid-November 2003. If you wish to discuss this further, please contact Ms. Alice Yeh, Remedial Project Manager, at (212) 637-4427 or Ms. Kedari Reddy, Assistant Regional Counsel, at (212) 637-3106. Please note that all communications from attorneys should be directed to Ms. Reddy.

Sincerely yours,

George Pavlou, Director
Emergency and Remedial Response Division

Enclosure

cc: Robert M. Becker, Esq.
Kraemer, Burns, Mytelka & Lovell, P.A

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PRPs in Receipt of Notice Letters:

PRP	Legal Counsel
J. Roger Hirl President and Chairman of the Board Occidental Chemical Co. Occidental Tower 5005 LBJ Freeway Dallas, Texas 75244	Paul W. Herring, Esq. Andrews & Kurth L.L.P. 1717 Main Street, Suite 3700 Dallas, Texas 75201
Joseph Gabriel Vice President of Operations 360 North Pastoria Environmental Corp. 1100 Ridgeway Avenue Rochester, New York 14652-6280	Philip Sellinger, Esq. Sills Cummis Zuckerman One Riverfront Plaza Newark, NJ 07102
Robert Ball, President Alcan Aluminum Corporation 100 Erieview Plaza, 29th Floor Cleveland, Ohio 44114	Lawrence Salibra, Esq. Alcan Aluminum Corporation 6060 Parkland Blvd. Mayfield Hts., OH 44124
Mark Epstein, President Alden Leeds Inc. 55 Jacobus Ave. Kearny, New Jersey 07032	Eric Aronson, Esq. Whitman Breed Abbott & Morgan One Gateway Center Newark, NJ 07102
Alan Bendelius, President Alliance Chemical, Inc. Linden Avenue Ridgefield, New Jersey 07657	Fredi L. Pearlmutter, Esq. Cooper, Rose & English, LLP 480 Morris Avenue Summit, New Jersey 07901-1527
William Gentner, President The Andrew Jergens Co. 2535 Spring Grove Ave. Cincinnati, Ohio 45214	A. Christian Worrell III, Esq. Head & Ritchey, LLP 1900 Fifth Third Center 511 Walnut Street Cincinnati, OH 45202
Gary Cappeline, President Ashland Specialty Chemical Co. 5200 Blazer Parkway Dublin, Ohio 43017	Stephen Leermakers, Esq. Ashland Specialty Chemical Co. 5200 Blazer Parkway Dublin, OH 43017
Klaus Peter Loebbe, President BASF Corporation 3000 Continental Drive North Mount Olive, New Jersey 07828	Nan Bernardo, Esq. and Nancy Lake Martin, Esq. BASF Corporation 3000 Continental Drive North Mount Olive, NJ 07828

Joseph Akers, Vice President Bayer Corporation 100 Bayer Road Pittsburgh, Pennsylvania 15205-9741	Gerard Hickel, Esq. Bayer Corporation 100 Bayer Road Pittsburgh, PA 15205-9741
Yvan Dupay, President Benjamin Moore & Co. 51 Chestnut Ridge Road Montvale, New Jersey 07645	Arthur Schulz, Esq. Environmental Counsel 4910 Massachusetts Ave., N.W. Suite 221 Washington, DC 20016
Alberto Celleri, President Chemical Compounds Inc. 10 Baldwin Court Roseland, New Jersey 07086	Jim Giannotti Chemical Compounds Inc. 29-75 Riverside Avenue Newark, NJ 07104
President Chris-Craft Industries, Inc. 767 Fifth Avenue, 46th Floor New York, New York 10153	Brian Kelly, Esq. Chris-Craft Industries, Inc. 767 Fifth Avenue, 46th Floor New York, NY 10153
John Guffey, President Coltec Industries, Inc. 3 Coliseum Centre 2550 West Tyvola Road Charlotte, North Carolina 28217	John R. Mayo, Esq. Coltec Industries, Inc. 430 Park Avenue New York, NY 10022
Roger Marcus, President Congoleum Corporation 3705 Quakerbridge Road Mercerville, New Jersey 08619	Russell Hewit, Esq. Dughi & Hewit 340 North Avenue Cranford, NJ 07016
Martin Benante, Chairman Curtiss-Wright Corp. 4 Becker Farm Road Roseland, New Jersey 07068	James Maher, Esq. Curtiss-Wright Corp. 4 Becker Farm Road Roseland, NJ 07068
Antonio Perez, President Eastman Kodak Company 343 State Street Rochester, New York 14650	Elliot Stern, Esq. Eastman Kodak Company 343 State Street Rochester, NY 14650
Edgar Woolard, Chairman E.I. du Pont de Nemours & Co. 1007 Market Street Wilmington, Delaware 19898	Bernard J. Reilly, Esq. Corporate Counsel E.I. du Pont de Nemours & Co. 1007 Market Street Wilmington, DE 19898

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David Weisman, CEO Elan Chemical Company 268 Doremus Ave. Newark, New Jersey 07105	Jeffrey Schwartz, Esq. Sarber Schlesinger Satz & Goldstein One Gateway Center Newark, NJ 07102
Al Reisch, President E M Sergeant Pulp & Chemical Co. Inc. 6 Chelsea Road Clifton, New Jersey 07102	None
Mark Tucker, Esq. Essex Chemical Corp. 2030 WMDC Midland, Michigan 48674	Kenneth Mack, Esq. Fox, Rothschild, O'Brien & Frankel Princeton Pike Corp.Center 997 Lenox Drive, Building 3 Lawrenceville, NJ 08648
Todd Walker, President Fairmount Chemical Co. Inc. 117 Blanchard St. Newark, New Jersey 07105	John Ix, Esq. Porzio Bromberg & Newman 163 Madison Ave. Morristown, NJ 07962
Bradley Buechler, President Franklin-Burlington Plastics Inc. 113 Passaic Ave. Kearny, New Jersey 07032	Robert M. Becker, Esq. Kraemer, Burns, Mytelka & Lovell, P.A. 675 Morris Ave. Springfield, NJ 07081
Henry Benz, President Hoescht Celanese Chemicals, Inc. Route 202-206 P.O.Box 2500 Somerville, New Jersey 08876	Anne Conley-Pitchell, Esq. Hoescht Celanese Corp. Route 202-206 P.O.Box 2500 Somerville, NJ 08876
Francine Rothschild, President Kearny Smelting & Refining 936 Harrison Ave #5 Kearny, New Jersey 07032	None
Henry Schact, CEO Lucent Technologies, Inc. 600 Mountain Avenue Murray Hill, New Jersey 07974	Ralph McMurry, Esq. Hill, Betts & Nash LLP 1 Riverfront Plaza, Suite 327 Newark, NJ 07102-5401
Richard Meelia, President Mallinckrodt, Inc. 675 McDonnell Blvd. Hazelwood, Missouri 63042	Patricia Duft, Esq. Mallinckrodt, Inc. 675 McDonnell Blvd. Hazelwood, MO 63042

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Richard Mahoney, CEO Monsanto Company 800 N. Lindbergh Blvd. St. Louis, Missouri 63167	L. William Higley, Esq. Monsanto Company 800 N. Lindbergh Blvd. St. Louis, MO 63167
Joseph Galli, President Newell Rubbermaid, Inc. 29 E. Stephenson St. Freeport, Illinois 61032	Peter Schultz, Director Environmental Affairs Newell Co. 4000 Auburn St. Rockford, IL 61101
Jean-Pierre van Rooy, President Otis Elevator Company North American Operations 10 Farm Springs Road Farmington, Connecticut 06032	Sarah Hurley, Esq. Robinson & Cole LLP 695 East Main Street Stamford, CT 06904-2305
Richard Ablon, President Ogden Corporation Two Pennsylvania Plaza, 25th Floor New York, New York 10121	J.L. Effinger, Esq. Ogden Corporation Two Pennsylvania Plaza, 25th Floor New York, NY 10121
Henry McKinnell, Chairman Pfizer Inc. 235 E. 42nd St. New York, New York 10017	Michael McThomas, Esq. Pfizer Inc. 235 E. 42nd St. New York, NY 10017
Raymond LeBoeuf, President PPG Industries, Inc. One PPG Place Pittsburgh, Pennsylvania 15272	Joseph Karas, Esq. PPG Industries, Inc. One PPG Place Pittsburgh, PA 15272
Lawrence Codey, President PSE&G Co. P.O. Box 570 Newark, New Jersey 07101-0570	Hugh Mahoney, Esq. PSE&G Co. P.O. Box 570 Newark, NJ 07101
Phillip D. Ashkettle, President Reichhold Chemicals, Inc. P.O. Box 13582 Research Triangle Park, North Carolina 27709	Adam S. Walters, Esq. Phillips, Lytle, Hitchcock, Blaine & Huber 3400 Marine Midland Center Buffalo, NY 14203
Robert McNeeley, President Reilly Industries, Inc. 1510 Market Square Center 151 North Delaware Street Indianapolis, Indiana 46204	Paul Rivers, Director Corporate Environmental Affairs Reilly Industries, Inc. 1500 S. Tibbs Avenue Indianapolis, IN 46242

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Robert Finn, President RSR Corporation 2777 Stemmons Freeway, Suite 1800 Dallas, Texas 75207	Howard Myers, Esq. RSR Corporation 2777 Stemmons Freeway, Suite 1800 Dallas, TX 75207
Christopher Connor, CEO The Sherwin-Williams Company 101 Prospect Avenue, N.W. Cleveland, Ohio 44115-1075	Donald McConnell, Esq. The Sherwin-Williams Co. 101 Prospect Ave., N.W. Cleveland, OH 44115
George Barrett, President Teva Pharmaceuticals USA Inc. 1090 Horsham Road North Wales, Pennsylvania 19454	Kirsten E. Bauer, Esq. Teva North America 1090 Horsham Road North Wales, PA 19454
Robert Senior, President Three County Volkswagen 701 Riverside Ave. Lyndhurst, New Jersey 07071	Robert DiLascio, Esq. 30 Park Avenue, Suite 101 Lyndhurst, NJ 07071
Michael Jordan, President Westinghouse Electric Corp. 11 Stanwix Street Pittsburgh, Pennsylvania 15222	Roger Willis, Esq. Westinghouse Electric Corp. 11 Stanwix Street Pittsburgh, PA 15222
Isaac Weinberger, President Wiggins Plastics Inc. 547 Maitland Ave. Teaneck, New Jersey 07666	None

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