




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

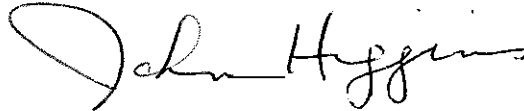
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

**ACTION MEMORANDUM RVI**


**DATE:** MAR 12 2009

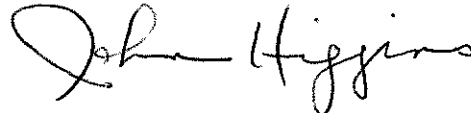
**SUBJECT:** Confirmation of Verbal Authorizations and a Request for a Ceiling Increase for the CERCLA Removal Action at the Abrachem Chemical Site, Clifton, Passaic County, New Jersey, 07014

**FROM:**  Paul L. Kahn, On-Scene Coordinator  
Response and Prevention Branch



**TO:** Walter E. Mugdan, Director  
Emergency and Remedial Response Division

**THRU:**  Eric J. Mosher, Chief  
Response & Prevention Branch



**Site ID No.:** A212

**I. PURPOSE**

The purpose of this Action Memorandum is to confirm and document three verbal authorizations and to request a ceiling increase to continue to conduct a time-critical removal action described herein at the Abrachem Chemical Site ("Site") located at 2 Peekay Drive, Clifton, Passaic County, New Jersey, 07014. The first verbal authorization was granted by the Director of the Emergency and Remedial Response Division ("ERRD") on November 14, 2008. The second and third verbal authorizations were granted by the Deputy Division Director of ERRD on February 21, 2009 and March 5, 2009 respectively. The total extramural funding verbally authorized to date is \$450,000, of which \$400,000 is for mitigation contracting. The total extramural funding increase requested in this memorandum is \$810,000, of which \$570,000 is for mitigation contracting. Approval of this request would raise the current extramural site ceiling from \$450,000 to \$1,260,000 and raise the mitigation ceiling from \$400,000 to \$970,000.

This Action Memorandum would serve as approval for expenditures for the U.S. Environmental Protection Agency (“EPA”) to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the Site. The Site is a former bulk chemical storage and repackaging facility. The funds are requested to mitigate threats posed by the presence of nearly 1,000 drums, many in deteriorated condition, haphazardly stored at the Site. One of the drums burst and released phenol, a Comprehensive Environmental Response, Compensation and Liability Act (“CERCLA”) hazardous substance, and many others are suspected to contain hazardous substances. The proposed removal of hazardous substances would be taken pursuant to Section 104(a)(1) of CERCLA and 40 C.F.R. Part 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (“NCP”).

The Site is not proposed for listing on the National Priorities List (“NPL”) and there are no nationally significant or precedent-setting issues associated with this removal action.

## **II. SITE CONDITIONS AND BACKGROUND**

The Comprehensive Environmental Response, Compensation and Liability Information System ID Number for this time-critical removal action is NJR000031831.

### **A. Site Description**

#### **1. Removal site evaluation (“RSE”)**

On October 29, 2008, notification of a release on the premises of the Abrachem Chemical Site was received by the Region II Regional Response Center from the New Jersey Department of Environmental Protection (“NJDEP”), which requested EPA presence at the Site. The EPA On-Scene Coordinators (“OSCs”) responding to the request from NJDEP observed a clean-up contractor trying to remediate a leaking drum that was stored inside a 40’ Intermodal Shipping Container (“ISC”). The OSCs discovered that as many as seventeen ISCs were packed with rusted and leaking drums. On October 30, 2008 and October 31, 2008, Field Expedient Notices (“FEN”) were issued to the Site operator, Abrachem Group LLC (“Abrachem”), and the owner of the Site, Clifton 2003 LLC.

Abrachem responded to the FEN and indicated that it would perform a removal action, but it subsequently demonstrated that it was not able to fund a removal action that met the criteria that EPA believed to be adequate to prevent another release. Anticipating the need for an emergency response to the conditions at the Site, on November 14, 2008 verbal authorization to activate EPA’s Emergency Rapid Response Services (“ERRS”) contractor, and a mitigation ceiling of \$250,000 was given by the Director of the ERRD.

However, the operator of the Site, Abrachem Group LLC, refused to grant EPA’s request for access to initiate a response, and on November 17, 2008 a second release occurred while Abrachem personnel were moving an ISC from one location to another. The chemical released was identified as phenol, a CERCLA listed hazardous substance. The Clifton Fire Department and NJDEP responded to the release. The release resulted in the evacuation of the Abrachem premises.

Abrachem's efforts to conduct a response action were, from the onset of the EPA involvement at the Site on October 29, 2008, too inadequate to prove to EPA that Abrachem was able to perform the activities needed to prevent another release to the environment. Apparent payment problems resulted in Abrachem's clean up subcontractor, Clean Venture ("CV"), working on an intermittent basis. CV typically worked for one or two days then left the Site. Between October 29, 2008 and December 3, 2008 CV never worked for more than two consecutive days, and worked for a total of only six days, during which time it overpacked approximately 40 drums and sampled approximately 80 drums, but did not test any of them.

At the time of the initial EPA response on October 29, 2008, and from subsequent conversations with Abrachem personnel and correspondence, EPA determined that there were 15 ISCs at the Site that contained hundreds of drums of chemicals. EPA also determined that the operator of the Site had limited knowledge as to the contents of the vast majority of the deteriorated and unmarked drums in the ISCs. Most of the hundreds of drums in the ISCs were very deteriorated and had no labels or other identifying markings. Judging by the severely rusted and deteriorated condition of the drums, they appeared to have been stored in the ISCs for many years. Over a period of four weeks after the October 10, 2008 release, CV was able to unload approximately 100 drums from two ISCs, some of which were staged inside the premises, while others were staged outside under plastic. Abrachem has had CV sample approximately 80 drums (but CV has not tested any) and overpack perhaps 40 drums. This work constitutes an inadequate response to the overall problem of hundreds of drums of unknown contents improperly and haphazardly stored under conditions that do not protect the drums from potentially releasing their contents to the environment.

On November 14, 2008, EPA sent Consent for Access form to Abrachem requesting that Abrachem sign the form. The consent form requested access to monitor, investigate and perform other response activities at the Site if determined necessary by EPA. On November 14, 2008, Abrachem returned a signed consent form, but Abrachem had so heavily conditioned and limited EPA's access that EPA deemed it a denial of access. On November 25, 2008, EPA sent an access consent form again to Abrachem, which responded by sending the identical marked-up form to EPA. Clifton 2003 LLC, the property owner, also returned Consent for Access form to EPA that was inadequate for the purpose of performing a drum removal action. On December 5, 2008, EPA issued a Unilateral Administrative Order (Index No. CERCLA-02-2009-2007) ("Order") to Abrachem and to the operator individually, ordering the Respondents to grant access to EPA.

Respondent Abrachem requested to meet with EPA regarding access pursuant to the Order. After the meeting, EPA informed Abrachem it would not modify the Order. On December 15, 2008, Respondent Abrachem informed EPA in writing that it would agree to the same restrictions as before. At EPA's request, the U.S. Department of Justice ("DOJ") filed an application in Federal District Court for the District of New Jersey for an Administrative Warrant for Access to the Site. On January 8, 2008, the court issued a warrant giving EPA entry onto the Site to perform response activities including: monitoring site conditions; inspecting drum containers on the Site; taking an inventory of drums and other containers at the Site; taking samples from drums and other containers at the Site; removing any hazardous and potentially hazardous drums from the Site; and taking any other response activities deemed necessary by EPA that are not inconsistent with the NCP.

## 2. Physical location

The Site, an approximately 2-acre parcel, is located within a small industrial park located at 2 Peekay Drive, Clifton, Passaic County, New Jersey, 07014, that sits amidst a residential neighborhood of single family houses and a small commercial district. According to the U.S. Census Bureau statistics for 2000 there are between 4,700 and 5,900 people within a 1-mile radius of the Site.

The Site is bounded on the south by a residential area and on the east by Route #21 and the Passaic River and another residential area. Beyond the Passaic River, and within ½ mile of the Site, are more residential areas and further to the east is the Meadowlands Sports Complex. See Appendix for the site location map.

## 3. Site characteristics

Situated in the approximate center of the Site is a 1-story concrete block building occupying approximately 100,000 sq. ft. It is the only building on the Site. The ISCs are located on the east side of the building and are stacked directly on the soil. The Site is owned by a holding company, Clifton 2003 LLC, which leases the premises to Abrachem. Abrachem is engaged in the business of repackaging and warehousing bulk chemicals. Although there is some residual waste generated from repackaging operations, the majority of the approximately 100 drums that are accessible at the Site are unlabeled and contain aged chemicals. Some containers, however, are labeled and based on their label information they contain sodium hydroxide, phenol, orthocresol, naphthalene paraformaldehyde, or methylethylketone, all of which are CERCLA listed Hazardous Substances. Including these approximately 100 drums and those still in the ISCs, EPA estimates that there are nearly 1,000 drums at the Site. This is the first EPA removal action taken at this facility.

## 4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

Based on visual observations, label information, generator knowledge, and limited inventory lists, hazardous substances have been identified at the Site. The following table provides a list of chemicals and materials found on-site and the appropriate hazardous substance designation under CERCLA.

Description of Material	EPA Designation as a Hazardous Substance Under CERCLA
Ortho-cresol	3
Phenol	1,2,3,4
Paraformaldehyde	1
Methylethylketone	3,4

### Legend:

- 1 = Clean Water Act, Section 311(b)(2)
- 2 = Clean Water Act, Section 307(a)
- 3 = Clean Air Act, Section 112
- 4 = Resource Conservation and Recovery Act, Section 3001

On November 17, 2008, a release of phenol, a CERCLA listed hazardous substance, occurred when an Abrachem employee moved the ISC that contained, among other chemicals, drums of waste phenol. The threat of additional releases exists by virtue of the presence of hundreds of drums of unknown chemicals stored haphazardly, without regard to possible chemical incompatibility, in shipping containers not intended for long-term storage of chemicals in drums, and without any means of preventing or containing a spill.

**5. NPL status**

The Site is not on the NPL and there are no plans for its inclusion.

**6. Maps and pictures depicting site location and conditions:**

A map and plot plan of the Site is located in the Appendix.

**B. Other Actions to Date**

**1. Previous actions**

EPA performed an inspection of the Site in September 2006, in response to chemical odor complaints from the Clifton Fire Department. The unannounced inspection did not reveal any obvious problems or violations, and no odors were detected. However, in reviewing notes made at the time of the 2006 inspection it was clear that the Abrachem employee who escorted EPA on the property failed to point out the presence of the ISCs, nor did the escort point out that the ISCs on the Site contained drums of chemicals. There were no previous actions by EPA at this Site, but various departments with the City of Clifton and the NJDEP tried repeatedly to enforce environmental, fire, and building code regulations. For example, the Clifton Fire Department issued 82 pages of fire code violation to Abrachem over an eight year period, most of which the Fire Department stated were never resolved or adequately addressed.

**2. Current actions**

EPA responded to the scene at the request of the NJDEP on October 29, 2008. After learning that there was at least one responsible party that had hired a clean up contractor, EPA observed the response activities. When it was discovered the following day that the clean up contractor had departed the Site without addressing the remaining deteriorated drums inside the ISC, EPA issued FENs to both the owner and the operator of the Site.

On November 4, 2008, Abrachem informed EPA in writing that its contractor, GTI, was going to subcontract with CV to do the necessary removal action. Abrachem also stated that by November 15, 2008 it would have removed 50% of the "chemicals". Since that time, CV has been on-site on an intermittent basis to overpack, sample and test the drums there. EPA, or its Response Services Contractor, Weston Solutions, Inc., has been at the Site on the few days CV was working so it could monitor response activities. Aside from the minimal activities described above, Abrachem has not fulfilled any of the response tasks necessary to protect human health and environment. Based upon

the hazardous and unsafe conditions that continued to exist on-site, the lack of timely and appropriate actions by the potentially responsible party ("PRP") and after several attempts to obtain compliance consensually on January 8, 2008, the court issued a warrant giving EPA entry onto the Site to perform response activities. Since the ERRS contractor was already activated prior to the warrant for passive monitoring purposes, the transition into the removal action took place the same day. These actions are currently funded by verbal authorizations given by the ERRD Division Director on November 14, 2008 for \$250,000 and by the Deputy Division Director on February 21, 2009 and again on March 5, 2009 for \$50,000 and \$100,000 respectively. To date, EPA has expended over \$300,000, of the \$400,000 mitigation ceiling to conduct site stabilization activities that include: monitoring site conditions; inspecting drums and other containers; performing a complete inventory of all hazardous substances found in drums and other containers; sampling drums and other containers; repacking any hazardous and potentially hazardous drums on-site; recycling and or disposal of all hazardous substances or any other response activities deemed necessary by EPA.

### **C. State and Local Authorities' Roles**

#### **1. State and local actions to date**

The Site was verbally referred to the EPA by the NJDEP on October 29, 2008. The City of Clifton continues to provide logistical support to the on-going EPA removal action. The NJDEP, Passaic County Health Department, and Clifton Fire Department have cooperated with EPA and with each other, to monitor activities at the Site and to issue notices of violation in instances where violations were observed. The Clifton Fire Department continues to perform frequent drive-bys at the Site and conducts fire prevention inspections.

#### **2. Potential for continued State/local response**

The City of Clifton and NJDEP will continue to act in an advisory/supporting role throughout the removal action. The City will maintain a police presence in the form of frequent drive-bys and will alert EPA of any suspicious conditions. NJDEP will be able to provide guidance on clean-up levels and applicable, relevant, and appropriate requirements.

### **III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

#### **A. Threats to Public Health or Welfare**

The conditions at the Site continue to meet the criteria for a CERCLA removal action as described in the National Contingency Plan ("NCP"), Part 40 CFR 300.415(b)(2). The presence of numerous hazardous substances at the Site poses a threat to public health and the environment. These substances include orthoeresol, methylethyleketone, paraformaldehyde, and phenol which are listed at Table 302.4 of the NCP at 40 CFR Part 302.4. The likelihood of direct human exposure via inhalation of hazardous substances, direct dermal contact and migration to the soil by the threat of future releases of those substances pose an imminent and substantial endangerment to the public

health or welfare based on factors set forth in the NCP at 40 CFR §300.415(b)(2). The following criteria are directly applicable to the threats which exist at the Site:

**(i) Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances, or pollutants, or contaminants;**

The presence of hundreds of drums of mostly unknown chemicals, some of which have already been released into the environment, in an uncontrolled storage area, has a potential for a fire due to mixing of incompatible chemicals, spontaneous combustion, or vandalism. Smoke and fumes from such a fire would expose nearby residents who live close proximity to the Site.

**(iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of a release;**

In addition to the potential threat of a release posed by the presence of hundreds of drums of unknown chemicals at the Site, since October 29, 2008, there have been two actual releases of chemicals from deteriorated drums (see Section III(i), above. The spill that occurred on October 29, 2008 was never definitively identified because the drum that leaked was not marked and EPA was not provided with any inventory information regarding that particular drum. However, a second release from a deteriorated drum occurred on November 17, 2008, when one or more deteriorated drums of phenol, a CERCLA listed hazardous waste, burst and the contents were released to the environment. The strong chemical odors that emanated from the interior of the ISCs is indicative of leaks or spills having occurred inside the ISCs, and these spills could easily leak from the ISCs into the environment.

**(v) Weather conditions that may cause hazardous substances, or pollutants, or contaminants to migrate or be released;**

The Responsible Party has staged dozens of rusted drums of unknown chemicals on the ground outside the main building, and the storage of hundreds of deteriorated drums, most of which are not marked or otherwise identified, inside ISCs containers that are not climate controlled, has resulted in the severe deterioration of the containers to the point where additional releases from burst or perforated drums is imminent.

**(vi) Threat of fire or explosion;**

The warehouse and ISCs at the Site contain improperly stored and incompatible chemicals such as acids, bases and oxidizers together with combustible material. If incompatible materials were accidentally mixed in the presence of combustible material, the result could be a vigorous exothermic reaction. Runoff from potential firefighting effort will also contribute to the off-site release of hazardous substances or pollutants or contaminants. The total amount of material classification as hazardous substances has not been fully determined because many of the drums and smaller containers currently stored inside the ISCs are unlabeled, unreadable and based on a partial inventory provided by the PRP incorrect. Also, many containers are being found with little or no regard to compatibility. Improper storage of unknown reactive and or ignitable substances only

increases the potential of incompatible hazardous substances reacting that could create an exothermal reaction and fire. If a fire were to occur the smoke plume generated could result in the release of a large airborne plume of smoke containing organic compounds. This plume could easily migrate off-site into neighboring residential communities causing widespread exposure to airborne contaminants. On February 20, 2009 EPA and the ERRS contractors working on site discovered the presence of 6-55 gallon steel drums that were later identified to contain peroxide forming, potentially shock sensitive, substances located in the main warehouse. The discovery of these materials required additional verbally authorized funding providing for the use of specialized contracted resources, familiar with handling and treating these sensitive materials on-site.

**(vii) The availability of other appropriate federal or State response mechanisms to respond to the release; and**

No other federal or State response mechanism is available to respond in a timely manner to the significant threat presented by the Site. The local and State authorities have already indicated that they do not have the funds or expertise to respond to the threat of continued releases at this Site.

**(vii) Other situations or factors that may pose threats to public health, or welfare, of the United States or the environment.**

Abrachem is under a New Jersey Superior Court judgment to vacate the Site by December 31, 2008, pursuant to a negotiated settlement with the owner of the Site. The owner has since agreed to a short extension for Abrachem to remove its business inventory, however, inasmuch as there are hundreds of deteriorated drums of unknown and some known chemicals that are not currently capable of being transported as is, they will apparently be left behind when the Abrachem vacates the premises.

**B. Threats to the Environment**

The Site is located in a predominantly residential area. A release may result in hazardous substances being transported off-site via surface water runoff or by entering the groundwater. The presence of hundreds of drums of severely deteriorated drums of unknown chemicals stored haphazardly and unmonitored in an uncontrolled environment presents a potential for additional releases into the environment via direct contact with the ground or from a chemical fire resulting from the interaction of incompatible chemicals.

**IV. ENDANGERMENT DETERMINATION**

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.



## **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

### **A. Proposed Actions**

#### **1. Proposed action description**

The removal action envisioned may consist, but not be limited to the following actions:

- Providing site security;
- Erecting fencing and/or warning signs;
- Removing drums of chemicals from the Intermodal Shipping Containers and overpacking the drums to prevent a release;
- Sampling (QA/QC);
- Segregating drums and other containers by compatible chemical characteristics;
- Bulking compatible chemicals as deemed feasible;
- Transporting all wastes to off-site disposal facilities that are in compliance with EPA off-site disposal regulations;
- Soils will be tested to determine if residual contamination is present in concentrations that would require further removal consideration;
- Post removal site controls.

#### **2. Contribution to remedial performance**

The Site is not on the NPL. The response measures proposed in this Action Memorandum will address the threats posed to public health through removal of hazardous substances and wastes. The proposed action will contribute to any long term action with respect to the release or threatened release of hazardous substances at the Site.

#### **3. Description of alternative technologies**

On-site treatment or incineration is not appropriate for the types of hazardous substances and/or wastes at the Site. The selected removal action includes the characterization of hazardous substances found at the Site and the transportation of all hazardous substances off-site for treatment and/or disposal. On-site treatment or incineration is not appropriate for the types of hazardous substances and/or wastes at the Site. The selected removal action has been determined to be the appropriate response action for the Site based on the criteria of effectiveness, ability to implement, and cost.

#### **4. Engineering evaluation/cost analysis (EE/CA)**

Due to the time-critical nature of this removal action, an EE/CA was not prepared.

**5. Applicable or relevant and appropriate requirements (ARARs)**

ARARs identified for this project, including CERCLA, RCRA and the Department of Transportation regulations that pertain to the transportation and disposal of material from the Site will be complied with to the fullest extent practicable.

**6. Project schedule**

The removal action will continue upon approval of this Action Memorandum and can be completed within 12-months of the start of field activities.

**B. Estimated Costs**

The estimated costs for the completion of this project are summarized below.

<b>DIRECT EXRAMURAL COSTS</b>	<b>VERBALLY APPROVED CEILINGS</b>	<b>PROPOSED CEILING INCREASES</b>	<b>PROPOSED NEW SITE CEILINGS</b>
<b>Total Cleanup Contractor Cost (Includes 20% Contingency)</b>	\$400,000	\$570,000	\$970,000
<b>Removal Support Team, Extramural Costs</b>	\$0	\$80,000	\$80,000
<b>Subtotal, Extramural Costs</b>	\$400,000	\$650,000	\$1,050,000
<b>Extramural Cost Contingency</b>	\$50,000	\$160,000	\$210,000
<b>TOTAL DIRECT EXTRAMURAL COSTS</b>	\$450,000	\$810,000	\$1,260,000

## **VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

If this removal action is not taken or is delayed, the potential threat of additional releases of hazardous substances to the environment will increase.

## **VII. OUTSTANDING POLICY ISSUES**

None.

## **VIII. ENFORCEMENT**

As described above, EPA issued an access order to Abrachem and subsequently obtained an administrative warrant from the federal district court in New Jersey authorizing EPA's access at the Site to perform CERCLA response activities. EPA sent letters notifying Abrachem and Clifton 2003 LLC of their potential liability under CERCLA for the Site on December 23, 2008.

Abrachem Group LLC, filed for Chapter 11 (reorganization) bankruptcy in the U.S. Bankruptcy Court (D.N.J.) on January 12, 2009. This proceeding was later converted into a Chapter 7 (liquidation) proceeding on March 10, 2009. The Office of Regional Counsel is currently preparing a proof of claim for referral to the U.S. Department of Justice to file in the Abrachem Group LLC proceeding. Although neither has been named as a PRP by EPA, Mr. Tilghman Frey (who was apparently the highest level Abrachem official at the site) and his wife, Ms. Beverly Maleta Frey (who may have had a financial interest in Abrachem Group LLC), both recently filed as individuals for bankruptcy as well. In addition to the site operator, Abrachem Group LLC, the current owner of the site, Clifton 2003 LLC, is also potentially liable for EPA response costs at the Site. Additional PRP search efforts will be undertaken to determine if any other responsible parties exist from whom EPA costs may be recovered.

### **Total Estimated Costs**

<b>Cost</b>	<b>Funding Requested</b>
<b>Direct Extramural Costs</b>	\$1,260,000
<b>Direct Intramural Costs</b>	\$126,000
<b>Subtotal, Direct Costs</b>	\$1,386,000
<b>Indirect Costs (Regional Indirect Cost Rate 31.0%)</b>	\$429,660
<b>Estimated EPA Costs</b>	\$1,815,660

Note: Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the right of the United States to seek cost-recovery.

## IX. RECOMMENDATION

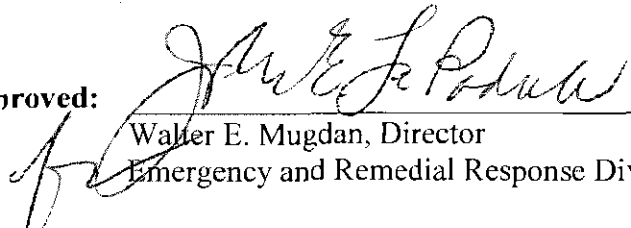
This decision document represents the selected removal action for the Abrachem Site, located in Clifton, Passaic County, New Jersey. This document was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site continue to meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of this Request for Authorization to complete the removal action and the request for a ceiling increase for the Abrachem Site. The total extramural funding increase requested in this memorandum is \$810,000, of which \$570,000 is for mitigation contracting.

Approval of this request would raise the verbally authorized extramural site ceiling from \$450,000 to \$1,260,000 and raise the mitigation contracting ceiling from \$400,000 to \$970,000.

Please indicate your approval and authorization for the Abrachem Site as per current Delegation of Authority, by signing below.

Approved: \_\_\_\_\_

  
Walter E. Mugdan, Director  
Emergency and Remedial Response Division

Date: \_\_\_\_\_

3/12/09

Disapproved: \_\_\_\_\_

Walter E. Mugdan, Director  
Emergency and Remedial Response Division

Date: \_\_\_\_\_

cc: after approval

W. Mugden, ERRD-D  
J. LaPadula, ERRD-DD  
E. Mosher, ERRD-RPB  
J. Daloia, ERRD-RPB  
J. Rotola, ERRD-RAB  
J. Higgins, ERRD-RPB  
B. Grealish, ERRD-RAB  
C. Peterson, ERRD-NJRB  
R. Basso, ERRD  
D. Karlen, ORC-NJSFB

D. Schwenk, ORC-NJSFB  
P. Brandt, PAD  
R. Manna, OPM-FMB  
T. Riverso, OPM-GCMB  
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P. McKechnie, OIG  
I. Kropp, NJDEP  
A. Raddant, USDOL  
L. Rosman, NOAA  
C. Kelley, RST

## APPENDIX

