newell

January 24, 1997

Mr. Pat Evangelista
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
290 Broadway, 19th Floor
New York, New York 10007-1866

RE: Request for information under CERCLA;
Diamond Alkali Superfund Site, Passaic River Study Area.

U.S. EPA letter 12-24-96 addressed to: President,
Goody Products, Inc. of Peachtree City, Georgia

Facility Location: 969 Newark Turnpike in Kearny, New Jersey.

Mr. Evangelista:

This is in response to the U.S. EPA "Request for Information" dated 12-24-96 and cited above. A blank copy of your Attachment A is attached as Exhibit A for easy reference. Response numbers correlate directly to request numbers.

1. Goody Products, Inc. operated at the facility from 1969--1994 (May); about 25 years. Operations ceased May, 1994.

2. (a) No Hazardous waste generator ID Number was NJD001340876.

   (b) Yes. Permit No. NJ0029505 Permit for discharge of treated industrial process wastewater (outfall 001A) held from June 2, 1984 until the facility was vacated in October 1994 (NJ DEP notification submitted by Killam Associates in March, 1995). See Exhibit 2B which contains a copy of the permit.

   Of course, no discharge by Goody Products, Inc. personnel from outfall 002A (treated sanitary wastewater) occurred after the property was vacated in October, 1994; we filed No Flow reports to the NJ DEP until August, 1996.

3. Answer is No to all listed substances except:

Ethylbenzene
Polyaromatic Hydrocarbons as may be present in heating fuel oil, lubricating oils and heat quench oil.

Toluene	Cadmium
Xylene	Chromium
Aluminum	Copper
Lead	Nickel
Zinc	Cyanide

4. Products manufactured were hair barrettes, and other metal hair accessories such as pins. No by-products were manufactured. Base metals (purchased) utilized were steel, stainless steel, and aluminum which would contain variable amounts of aluminum, iron and chromium.

Manufacturing processes to make final products from the base metals included:
Stamping and Forming to obtain semi-finished metal parts which were heat treated and annealed; oils were used.
Metal parts were subjected to burnishing (polishing) and scale removal using acid and caustic water mixtures.
Metallizing (coating) of certain products with aluminum metal - dry process.
Electroplating of nickel metal onto steel from acid solution of nickel ions.
Zinc plating from cyanide solutions may also have taken place.
Lacquer coating of metal parts; thinners containing ethylbenzene, toluene and xylene were used.

Hazardous wastes were generated - see response to 5 b; see also Form R Reports which will be provided in partial response to request No. 11.

5 (a). Not all persons are known. To the best of my knowledge:
Mike Krause, Vice President of Operations
Tim Lanier, Manager of Environmental Operations
Robert Anuszewski, Plant Manager
Nick Coffaro, Supervisor

(b) The primary source for this information will be the annual Hazardous Waste Reports submitted by Goody Products, Inc. (NJD001340876) to the N J DEP. This is being obtained with the assistance of Killam Associates and will be provided in the near future. Exhibit 5 b contains copies of the 1992, 1994, and 1995 reports. More information will be provided.

(c) To the best of my knowledge: There were no off-site storage activities. Raw materials for process use were stored inside; two (2) inside drum storage areas, one of these held drums designated as hazardous waste.
i. Additionally, an outside asphalt pad for collection of waste materials was used for a variety of containers. See "Base Site Map" prepared by Woodward Clyde Consultants (12-11-92) and marked Exhibit 5 (c) i.
ii. Unknown.

(d) NONE, NO WASTE TREATMENT PROCESS

6. (a) i. No. No sanitary sewer was available; sanitary wastewater was treated on-site (outfall 002A, permit NJ 0029505).

ii. Not applicable.

iii. See 2b above.

iv. Waste water process streams were analyzed as required for permit NJ 0029505; the Discharge Monitoring Reports submitted by Goody Products, Inc. to the N J DEP are the only source of this information. These reports are being obtained with the assistance of Killam Associates and will be provided in the near future.

(b) i. No
ii. Floor drains were connected to the sanitary wastewater treatment system. It is unknown when floor drains were inactivated.

(c) i. Yes. A stormwater collection pipe has always existed for the building. A wastewater discharge (sump) pit existed to handle treated process wastewater prior to final discharge via outfall 001A; actual installation date for this collection pit is unknown, probably mid-1980s. No lagoons.
ii. Lined pit.
iii. Not applicable.
iv. Since operations began until they were discontinued (app. 25 years), discharges occurred into the northern end of Dead Horse Creek. Process wastewater was treated prior to discharge to comply with permit No. NJ0029505. It is not known whether any treatment occurred prior to 1984. The chemical composition can only be provided from our response to 6 (a)(iv) above.

(d) Diagrams are being obtained with the assistance of Killam Associates and a response will be provided in the near future.

7.(a) Unknown
(b) Yes - Dead Horse Creek. See also response to 6(a)(iv) above. See also sections 1.2 and 3.4 of Exhibit 7b - the Woodward-Clyde Consultants report of June, 1993 contains the historical data. Sections 4.0, 5.0 and volume 2 of Exhibit 7(b) are not being submitted because of the updated information on the site which will be provided in response to request No. 12 (more test results of Creek sampling).

8. (a) None known
(b) Not applicable.

9. (a) None known
(b) Not applicable

10. See Exhibit 10.

11. A set of such documents pertaining to waste disposal is being provided in response to request 5b above.
Community Right to Know Survey reports provide information regarding all industrial chemical materials being utilized. The 1991 report is marked Exhibit 11. Killam Associates is assisting in locating copies of other Survey reports.

Additionally, Killam Associates will try to obtain copies of the Toxic Chemical Release Inventory Form R reports which were submitted to the EPCRA Report Center in Merrifield, VA and Trenton, NJ.

12. Yes. Under ISRA Case No. 93466 - see Exhibit 12. A compilation of pertinent information is being prepared by Killam Associates. Newell Company is making great progress implementing the workplan referred to in the NJ DEP letter of September 4, 1996.

13. (a) No - never owned by Goody Products, Inc.
(b) 1966--1995; see Exhibit 13b.
(c) Facility was operated by Goody Products Inc. from 1969--1994.

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14. (a) Goody Products, Inc.
    (b) William K. Berry, President
    Goody Products, Inc.
    600 West Park Drive
    Peach Tree City, GA 30269
    (c) Delaware. CT Corporation - Trust Agent
    (d) See Exhibit 14d.
    (e) Goody Products, Inc. is a wholly-owned subsidiary of Newell Company; by stock purchase of August 2, 1993.
    (f) None
    (g) None
    (h) Newell Co. incorporated in State of Delaware. CT Corporation - Trust Agent.
    (I) See response to 14e.

15. No former employees were contacted.
    Knowledge of response to 13 and 14: Mr. Richard H. Wolff, Corporate Secretary & Associate General Counsel, Newell Co., 4000 Auburn Street, Rockford, Illinois 61101 telephone: 815/969-6111
    All other responses: writer.

Respectfully submitted:

Dr. Peter J. Schultz

Peter J. Schultz, Ph.D.
Director, Environmental Affairs

telephone: 815/969-6151
FAX: 815/969-6106

cc: Ms. Amelia Wagner
Assistant Regional Counsel
Office of Regional Counsel
US Environmental Protection Agency
290 Broadway, 17th floor
New York, New York 10007-1866

cc:

newell

Dale L. Matschullat (letter only)
Vice President General Counsel
Newell Co.

Kevin E. Koch, P.E. (letter and Exhibit A)
Associate
Killam Associates
27 Bleeker Street, P.O. Box 1008
Milburn, N J 07041-1008

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of ILLINOIS :

County of STEPHENSON :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

PETER J. SCHULTZ
NAME (print or type)

DIRECTOR, ENVIRONMENTAL AFFAIRS
TITLE (print or type)

Peter J. Schultz
SIGNATURE

Sworn to before me this 23RD
day of JANUARY , 19 97

Janice L. Sievert
Notary Public

"OFFICIAL SEAL"
JANICE L. SIEVERT
Notary Public, State of Illinois
My Commission Expires 7/12/99

854110007

EXHIBIT A

ATTACHMENT A

REQUEST FOR INFORMATION

Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located or formerly located at 969 Newark Turnpike in Kearny, New Jersey may have been discharged into the Passaic River.

Please provide the information requested below, including copies of all available documentation that supports your answers.

1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?

2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq.? If "yes", please provide the years that your company held such a permit and its EPA Identification Number.

b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. § 1251, et seq.? If "yes", please provide the years that your company held such a permit.

3) Did your company receive, utilize, manufacture, discharge, release, store or dispose of any materials containing the following substances:

	Yes	No
2,3,7,8 tetrachlorodibenzo-p-dioxin or other dioxin compounds	___	___
Benzene	___	___
Ethyl benzene	___	___
Polyaromatic Hydrocarbons	___	___
If "yes", please list specific compounds.		
Toluene	___	___
Xylene	___	___
PCBs	___	___
Aluminum	___	___
Arsenic	___	___
Cadmium	___	___
Chromium	___	___
Copper	___	___
Gold	___	___

	Yes	No
Lead	___	___
Mercury	___	___
Nickel	___	___
Silver	___	___
Zinc	___	___
Cyanide	___	___

4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or by-product.

b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?

i) Describe the chemical composition of these hazardous substances.

ii) For each process, what amount of hazardous substances was generated per volume of finished product?

iii) Were these hazardous substances combined with wastes from other processes? If so, wastes from what processes?

5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4). Include information on the following:

a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.

b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

c) Describe <u>all</u> storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had

been paved with asphalt or concrete? Please provide a complete description of these storage areas.

ii) When drums were stored outside, were empty drums segregated from full drums?

d) What processes do you use to treat your waste? What do you do with the waste after it is treated?

6) a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):

i) Was the waste stream discharged into a sanitary sewer and if so, during what years?

ii) Were they treated before being discharged to the sanitary sewer and if so, how? Please be specific.

iii) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?

iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.

b) For floor drains or other disposal drains at the facility:

i) Did the drains connect to a sanitary sewer and if so, during what years?

ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?

c) i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?

ii) If catch basins or lagoons existed, were they lined or un-lined?

iii) What was stored in the lagoons?

iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released, and during which years?

d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.

7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.

b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in or discharged to the Passaic River or a tributary to the Passaic River, including, but not limited to, Dead Horse Creek? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.

8) a) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4), were released on the property, into the waste water or storm drainage system at the facility or to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

b) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.

9) a) Was your facility ever subject to flooding. If so, was the flooding due to:

i) overflow from sanitary or storm sewer back-up, and/or

ii) flood overflow from the Passaic River?

b) Please provide the date and duration of each flood event.

10) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.

11) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?

b) If so, please provide all other documents pertaining to the results of these analyses.

13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.

b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.

c) To the extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.

14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.

a) State the legal name of your company.

b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.

c) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.

d) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.

e) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.

f) Identify any predecessor organization and the dates that such company became part of your company.

g) Identify any other companies which were acquired by your company or merged with your company.

h) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified in the responses to items (14)(e), (f), and (g), above.

i) Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.

15) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

Exhibit 2b

Killam
Associates Consulting Engineers

27 Bleeker Street
P.O. Box 1008
Millburn, NJ 07041-1008
Telephone: 201-379-3400
Fax: 201-912-2400

March 31, 1995

Ms. Melisse Wilusz, Supervisor
State of New Jersey
Department of Environmental Protection
Division of Water Quality
Bureau of Standard Permitting
CN 029
Trenton, New Jersey 08625-0029

RE: Goody Products, Inc.
Kearny, Hudson County, New Jersey
NJPDES/DSW Permit #NJ0029505

Dear Ms. Wilusz:

Killam Associates (Killam) on behalf of the Newell Company (Newell) has reviewed your January 31, 1995 letter regarding the above referenced NJPDES Permit and is responding to same. As you have previously discussed with Dr. Peter Schultz of Newell, since the submittal of a March 23, 1994 NJPDES/DSW Renewal Application Package by Newell, the Goody facility (located at 969 Newark Turnpike in Kearny, New Jersey) has ceased operations and in turn has ceased discharging treated industrial process wastewater.

As outlined in your January 31, 1995 letter, the March 23, 1994 NJPDES/DSW Renewal Application Package must be revised due to the change in the nature of the pollutants currently and/or projected to be discharged (i.e., ceased discharge of treated industrial process wastewater). The projected discharge from the facility will be limited to treated sanitary waste (approximately 6,000 gallons per day (GPD)). As per your recent telephone conversation with this office, Newell is only required to submit the portions of the March 23, 1995 Renewal Application Package that are affected by the change in the nature of the discharge.

Based on our review of the March 23, 1995 Renewal Application Package, enclosed please find the following documents that have been revised due to the change in the projected discharge: NJPDES-1, EPA Form 3510-2C, and a flow schematic of the facility's regulated discharges.

Killam

If you have any questions, comments or require additional information, please do not hesitate to contact either Kevin E. Koch, P.E., at (201) 912-2490 or myself at (201) 912-2432 at your earliest convenience.

Very truly yours,

KILLAM ASSOCIATES

John K. Ruschke, P.E., P.P.
Project Engineer

Enclosures

cc: Dr. Peter Schultz, Newell Co. (w/enclosures)

K:\ENG\230401\NJDEP.LTR

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, attachm accompanying same application, and applicable laws and regulations. This permit is also subject to the further condit and stipulations enumerated in the supporting documents which are agreed to by the permittee upon acceptance of the pe

Permit No.	Issuance Date	Effective Date	Expiration Date
NJ0029505	June 2, 1984	August 1, 1984	July 31, 1989

Name and Address of Applicant	Location of Activity/Facility	Name and Address of Owner of Act
Goody Products, Inc. 969 Newark Turnpike Kearny, New Jersey 07032	969 Newark Turnpike Kearny, Hudson County New Jersey	Philip Goodman 969 Newark Turnpike Kearny, N.J. 07032

Issuing Division	Type of Permit	Statute(s)	Application No
[X] Water Resources [ ] Coastal Resources [ ] Environmental Quality [ ] Other	NJPDES/DSW	N.J.S.A. 58:10A-1 et seq.	NJ0029505

This permit grants permission to:

Discharge to Dead Horse Creek, classified as TW-2 Waters, in accordance with the effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, III, and IV hereof.

854110016

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

Arnold Schiffman
Administrator
~~Water Quality Management~~

6/2/84
DATE

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

(GENERAL CONDITIONS ARE ON THE REVER

Form DEP-007
2/82

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES

GENERAL CONDITIONS FOR ALL NJPDES DISCHARGE PERMITS

(a) Duty to comply.

1. The permittee shall comply with all conditions of this permit. No pollutant shall be discharged more frequently than authorized or at a level in excess of that which is authorized by the permit. The discharge of any pollutant not specifically authorized in the NJPDES permit or listed and quantified in the NJPDES application shall constitute a violation of the permit, unless the permittee can prove by clear and convincing evidence that the discharge of the unauthorized pollutant did not result from any of permittees industrial activities which contribute to the generation of its wastewaters. Any permit noncompliance constitutes a violation of the State Act or other authority of these regulations and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

2. A permittee shall not achieve any effluent concentration by dilution. Nor shall a permittee increase the use of process water or cooling water or otherwise attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve permit limitations or water quality standards.

3. The permittee shall comply with applicable effluent standards or prohibitions established under Section 307 (a) of the Federal and Section 4 of the State Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

4. The State Act provides that any person who violates a permit condition implementing the State Act is subject to a civil penalty not to exceed $10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing the State Act is subject to a fine of not less then $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than 1 year, or both.

(b) Duty to reapply. If the permittee wishes to continue an activity regulated by a NJPDES permit after the expiration date of the permit, the permittee shall apply for and obtain a new permit.

(c) Duty to halt or reduce activity.

1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

2. Upon the reduction, loss, or failure of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until the facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced or lost.

(d) Duty to mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit, including but not limited to, accelerated and/or additional types of monitoring, temporary repairs or other mitigating measures.

(e) Proper operation, maintenance, and operator licensing. The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment works, facilities, and systems of treatment and control (and related appurtenances) for collection and treatment which are installed or used by the permi tee for water pollution control and abatement to achie compliance with the terms and conditions of the permi Proper operation and maintenance includes but is n limited to effective performance based on designed fac lity removals, adequate funding, effective managemen adequate operator staffing and training and adequa laboratory and process controls including appropria quality assurance procedures as described in 40 CFR 1 and applicable State law and regulations. All permi tees who operate a treatment works, except for sanita landfills and land application of sludge or septag must satisfy the licensing requirements of t "Licensing of Superintendents or Operators of Publ Water Treatment Plants, Public Sewage Treatment Plar and Public Water Supply Systems" N.J.S.A. 58:11-18.10 seq. or other applicable law. This provision requir the operation of back-up or auxiliary facilities similar systems when necessary to achieve compliar with the conditions of the permit or where required applicable law or regulation.

(f) Permit actions. This permit may be modified, revo and reissued, or terminated for cause. The filing o request by the permittee for a permit modificati revocation and reissuance, or termination, or a noti cation of planned changes or anticipated noncomplian does not stay any permit condition.

(g) Property rights. This permit does not convey any p perty rights of any sort, or any exclusive privilege.

(h) Duty to provide information. The permittee shall f nish to the Department within a reasonable time, information which the Department may request to det mine whether cause exists for modifying, revoking reissuing, or terminating this permit, or to determ compliance with this permit. The permittee shall a furnish to the Department upon request, copies records required to be kept by this permit.

(i) Inspection and entry. The permittee shall allow Department or an authorized representative, upon presentation of credentials and other documents as be required by law to:

1. Enter upon the permittee's premises where discharge source is or might be located or in wl monitoring equipment or records required by a p mit are kept, for purposes of inspection, sampl copying or photographing. Photography shall allowed only as related to the discharge.

2. Have access to and copy, at reasonable times, records that must be kept under the condition: this permit;

3. Inspect at reasonable times any facilities, eq ment (including monitoring and control equipme practices, or operations regulated or requ under this permit; and

4. Sample or monitor at reasonable times, for the poses of assuring permit compliance or as other authorized by the State Act, any substance: parameters at any location.

(j) Monitoring and records.

1. Samples and measurements taken for the purpos monitoring shall be representative of the monit activity.

2. The State Act provides that any person falsifies, tampers with, or knowingly renders curate any monitoring device or method require be maintained under this permit, shall conviction, be punished by a fine of no more $10,000 per violation, or by imprisonment for more than 6 months per violations, or by both.

3. The applicant shall perform all analyses in accordance with the analytical test procedures approved under 40 CFR Part 136. Where no approved test procedure is available, the applicant must indicate a suitable analytical procedure and must provide the Department with literature references or a detailed description of the procedure. The Department shall consider such method as the appropriate procedure and so require in the NJPDES permit.

The laboratory performing the analyses for compliance with this regulation must be Approved and/or Certified by the Department for the analysis of those specific parameters.

Information concerning laboratory approval and/or certification may be obtained from:

New Jersey Department of Environmental Protection
Division of Administrative Operations
Central Collection and Licensing Unit
P.O. Box 1390
Trenton, N.J. 08625
(609) 292-4071

4. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 5 years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

5. Records of monitoring information shall include:

   i. The date, exact place, and time of sampling or measurements;

   ii. The individual(s) who performed the sampling or measurements;

   iii. The date(s) analyses were performed;

   iv. The individual(s) who performed the analyses;

   v. The analytical techniques or methods used; and

   vi. The results of such analyses.

6. Monitoring results shall be reported on a Discharge Monitoring Report (DMR) and/or on the Department's Monitoring Report Form (MRF).

7. If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR 136 or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or MRF.

8. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Department in the permit.

(k) Signatory requirement.

1. All permit applications, except those submitted for Class II wells for a UIC discharge (see paragraph 2) shall be signed as follows:

   i. For a corporation: by a principal executive officer of at least the level of vice president;

   ii. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or

   iii. For a municipality, State, Federal or other public agency: by either a principal executive officer or ranking elected official.

2. Reports. All reports required by permits, ot information requested by the Department and permit applications submitted for Class II we under N.J.A.C. 7:14A-5.8 shall be signed by a p son described in paragraph 1 of this section or a duly authorized representative of that person. person is a duly authorized representative only

   i. The authorization is made in writing by a p son described in paragraph 1 of this sectio

   ii. The authorization specifies either an indi dual or a position having responsibility the overall operation of the regulated fa lity or activity, such as a position of pl manager, operator of a well or well fie superintendent or person of equivalent r ponsibility; and

   iii. The written authorization is submitted to Department.

3. Changes to authorization. If an authorizat under paragraph 2 of this section is no lon accurate because a different individual or posit has responsibility for the overall operation of facility, a new authorization satisfying requirements of paragraph 2 of this section sh be submitted to the Department prior to or toget with any reports, information, or applications be signed by an authorized representative.

4. Certification. Any person signing any docum under paragraph 1 or 2 shall make the follow certification: "I certify under penalty of that I have personally examined and am famil with the information submitted in this document all attachments and that, based on my inquiry those individuals immediately responsible obtaining the information, I believe the submi information is true, accurate and complete. I aware that there are significant penalties for mitting false information, including the pos bility of fine and imprisonment."

5. Any person who knowingly makes a false statem representation, or certification in application, record, or other document filed required to be maintained under the State shall upon conviction, be subject to a fine of more than $10,000 or by imprisonment for not than 6 months, or by both.

(l) Reporting requirements.

1. Planned changes. The permittee shall give no to the Department as soon as possible of planned physical alterations or additions to permitted facility.

2. Anticipated noncompliance. The permittee sh give reasonable advance notice to the Departmen any planned changes in the permitted facility activity which may result in noncompliance permit requirements.

3. Transfers. This permit is not transferable to person except after notice to the Department. Department may require modification, revocation revocation and reissuance of the permit to ch the name of the permittee and incorporate other requirements as may be necessary under appropriate Act. ((See N.J.A.C. 7:14A-2.12); some cases, modification or revocation reissuance is mandatory).

4. Monitoring reports. Monitoring results shall reported at the intervals specified in the perm

5. Compliance schedules. Reports of compliance noncompliance with, or any progress reports interim and final requirements contained in compliance schedule of this permit shall be mitted no later than 14 days following each s dule date.

6. Reporting.

i. The permittee shall report any noncompliance which may endanger health or the environment. The permittee shall provide the Department with the following information:

(A) A description of the discharge;

(B) Steps being taken to determine the cause of noncompliance;

(C) Steps being taken to reduce and eliminate the noncomplying discharge;

(D) The period of noncompliance, including exact dates and times and if the noncompliance has not been corrected, and the anticipated time when the discharge will return to compliance;

(E) The cause of the noncompliance; and

(F) Steps being taken to reduce, eliminate, and prevent reoccurence of the noncomplying discharge.

ii. The permittee shall orally provide the information in i.(A) through (C) to the DEP Hotline (609) 292-7172 within 2 hours from the time the permittee becomes aware of the circumstances.

iii. The permittee shall orally provide the information in i.(D) through (E) to the DEP Hotline within 24 hours of the time the permittee becomes aware of the circumstances.

iv. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain the information in i.(A) through (F).

7. Other noncompliance. The permittee shall report all instances of noncompliance not reported under paragraphs 1., 4., 5., and 6. of this section, at the time monitoring reports are submitted. The reports shall contain the information required in the written submission listed in paragraph (1)6. of this section.

8. Other information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, the permittee shall promptly submit such facts or information.

(m) RESIDUALS MANAGEMENT

1. Collected grit and screenings, scums, sand bed sands, slurries, and sludges, and all other solids from the treatment process shall be disposed of in such a manner as to prevent such materials from entering the ground and/or surface waters of the state except in accordance with a NJPDES permit. If for any reason such materials are placed in the water or on the lands where they may cause pollutants to enter the ground and/or surface waters of the state, the following information shall be reported to the Water Resources Enforcement Element together with the monitoring data required in Section B.2 (ADDITIONAL CONDITIONS):

i. Dates of occurrence;

ii. A description of the noncomplying discharge (nature and volume);

iii. Cause of noncompliance;

iv. Steps taken to reduce and eliminate the noncomplying discharge; and

v. Steps taken to prevent recurrence of the conditions of noncompliance.

2. Permittee shall not be permitted to store sludge on-site beyond the capacity of the structural treatment and storage components of the treatment facility. Nor shall the permittee be permitted to store sludge on-site in any manner which is not in accordance with Solid Waste Management Rules, N.J.A.C. 7:26-1 et seq. Any violations must be reported by the Permittee to the Division of Water Resources Enforcement Element within twenty-four (24) hours.

3. The permittee shall comply with the Sludge Quality Assurance Regulations (N.J..A.C. 7:14-4.1 et seq.). Where quality information is required by these regulations, analyses must reflect the quality of the final sludge product of which the permittee must dispose.

4. The permittee shall dispose of sludge from this facility in compliance with the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq., which, requires conformance with Statewide and District Sludge Management Plans and prohibits the disposal of bulk liquids (including but not limited to sludge) in landfills unless the landfill is lined and an approved leachate interception, collection, and treatment system has been installed.

5. The permittee shall at all times have on file with the Department proof of proper disposal at a facility duly licensed and permitted by the state to dispose of sludge. To satisfy this requirement the permittee shall submit proof of ownership or contractual arrangement with a permitted facility for the composting, land application, thermal reduction, or landfilling of sludge.

Where such permitted sludge disposal does not extend the full term of this permit, the permittee shall submit similar proof of new permitted disposal arrangements which shall become effective no later than the expiration date of previous arrangements. All such proofs of disposal site must be submitted to the Bureau of Permits Administration in duplicate.

6. Where this permit is a reissuance of a permit held on a facility approved for operation prior to March 6, 1982, item below shall apply. Where this permit is issued to a facility approved for operation after March 6, 1982, item ii below shall apply:

i. By issuance of this permit the Department hereby gives the permittee notice that the permittee is bound by the New Jersey Pollutant Discharge Elimination System regulations regarding proper sludge disposal (section 2.5(m)). Possession of this permit in no way waives requirements under this section of the regulations for submission of information regarding termination of landfill disposal of sludge by March 15, 1985.

ii. Where the permittee files with the Department under permit condition m.5. above proof of sludge disposal at a landfill licensed for sludge disposal, the permittee shall submit to the Department a statement of the following within six (6) months of the date of issuance of this permit:

(A) Justification for the continuance of the disposal of sludge in a landfill.

(B) A description of the steps being taken to comply with the March 15, 1985 deadline for abandonment of landfilling for the disposal of sludge.

(C) The manner in which solid sludge will be disposed of until March 15, 1985.

7. The permittee shall comply with the Rules and Regulations for the Statewide Management of Septage Disposal (N.J.A.C. 7:14-5.1 et seq.).

8. The permittee shall conform with the requirements under:

i. Section 405 of the Federal Act governing the disposal of sewage sludge from publicly owned treatment works and with Section 4 and 6 of the State Act.

ii. To the extent practicable, the "Guidelines for the Utilization and Disposal of Municipal and Industrial Sludges and Septage"; and

iii. The provisions concerning the disposal of sludge in sanitary landfills which will be developed in the Statewide Sludge Management Plan promulgated pursuant to the "State Solid Waste Management Act," N.J.S.A. 13:1E-1 et seq.

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES

ADDITIONAL CONDITIONS FOR ALL NJPDES DISCHARGE PERMITS

A. DEFINITIONS

Unless otherwise stated, all terms shall be as defined in the "Regulations Concerning the New Jersey Pollutant Discharge Elimination System," N.J.A.C. 7:14A-1 et seq.

1. "Aliquot" means a sample of specified volume used to make up a total composite sample.

2. "Composite" means a combination of individual (or continuously taken) samples (aliquots) of at least 100 milliliters, collected at periodic intervals over the entire discharge day. For volatile pollutants, aliquots must be combined in the laboratory immediately before analysis. The composite must be flow proportional; either the time interval between each aliquot or the volume of each aliquot must be proportional to either the stream flow at the time of sampling or the total stream flow since the collection of the previous aliquot. Aliquots may be collected manually or automatically. For a continuous discharge, a minimum of 24 aliquots (at hourly intervals) shall be collected and combined to constitute a 24-hour composite sample. For intermittent discharges of 4 or more than 4 hours duration, aliquots shall be taken at a minimum of 30 minute intervals. For intermittent discharges of less than 4 hours duration, aliquots shall be taken at a minimum of 15 minute intervals.

3. "Grab" means an individual sample of at least 100 milliliters collected over a period not exceeding 15 minutes.

4. "Monthly" means one day each month (the same day each month) and a normal operating day (e.g., the 2nd Tuesday of each month).

5. "Weekly" means every seventh day (the same day each week) and a normal operating day.

6. "EDP" means Effective Date of Permit.

B. MONITORING AND REPORTING REQUIREMENTS

1. Monitoring and Records. See GENERAL CONDITION (j).

2. Discharge Monitoring Reports.

a. Monitoring results obtained during the previous One month(s) shall be summarized and reported on the appropriate Monitoring Report Forms, postmarked no later than the 10th day of the month following the completed reporting period. The first report is due on September 10, 1984. Signed copies of these, and all other reports required herein, shall be submitted to the following address(es):

Administrator
Water Quality Management
NJPDES Permit Administration
Division of Water Resources
CN 029
Trenton, N.J. 08625

Regional Administrator
Region II
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278
Attn: Permits Administration Branch

b. If a contract laboratory is utilized, the permittee shall submit the name and address of the laboratory and the parameters analyzed at the time it submits its discharge monitoring reports (See Section 2.a. above). Any change in the contract laboratory being used or the parameters analyzed shall be reported prior to or together with the monitoring report covering the period during which the change was made.

C. OTHER PROVISOS

1. Reopener Clause for Toxic Effluent Limitations. Notwithstanding any other condition of this permit, if any applicable toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is promulgated under Section 307(a) of the Federal Act or Sections 4 or 6 of the State Act for a toxic pollutant and that standard or prohibition is more stringent than any limitation on the pollutant in the permit (or controls a pollutant not limited in the permit), this permit shall be promptly modified or revoked and reissued to conform to the toxic effluent standard or prohibition.

2. Other Laws and Regulations. The issuance of a permit does not authorize any injury to persons or property or invasion of other private rights, or any infringement of Federal, State or local law or regulations.

3. Availability of Information.

   a. NJPDES permits, effluent data, and information required by NJPDES application forms provided by the Department under N.J.A.C. 7:14A-2.1 (including information submitted on the forms themselves and any attachments used to supply information required by the forms) shall be available for public inspection at the offices of the Department's Division of Water Resources.

   b. In addition to the information set forth in Subsection a., any other information submitted to the Department in accordance with the conditions of this permit shall be made available to the public without further notice unless a claim of business confidentiality is asserted at the time of submission in accordance with the procedures in N.J.A.C. 7:14A-11.1 et seq.

   c. If a claim of confidentiality is made for information other than that enumerated in Subsection a., the information shall be treated in accordance with the procedures in N.J.A.C. 7:14A-11.1 et seq. Only information determined to be confidential under those procedures shall not be made available by the Department for public inspection.

4. Severability. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES

ADDITIONAL CONDITIONS FOR NJPDES DSW PERMITS

A. Additional Conditions applicable to all DSW permits, N.J.A.C. 7:14A-3.10.

(a) 1. The following shall be reported to the Department in accordance with Section 2.5(1)6.

i. In the case of any discharge subject to any applicable toxic pollutant effluent standard under Section 307(a) of the Federal Act or under Section 6 of the State Act the information required by paragraph 2.5(1)6.i.(A) through (C) regarding a violation of such standard shall be provided to the Department within 2 hours from the time the permittee becomes sware of the circumstances. The information required by paragraph 2.5(1)6.i.(D) through (F) shall be provided to the Department within 24 hours from the time the permittee becomes aware of the circumstances. Where the information is providied orally a written submission covering these points must be provided within five working days of the time the permittee becomes aware of the circumstances covered by this paragraph.

ii. In the case of other discharges which would constitute a threat to human health, welfare, or the environment, including but not limited to, discharge of pollutants designated under Section 311 of the Federal Act, under Secton 6 of the State Act, under the "Spill Compensation and Control Act," N.J.S.A. 58:11-23.10 et seq., or under the "Safe Drinking Water Act," N.J.S.A. 58:12A-1 et seq., the information required by paragraph 2.5(1)6.i.(A) through (C) shall be provided with 2 hours from the time the permittee becomes awares of the circumstances. The information required by paragraphs 2.5(1)6.i.(D) through (F) shall be provided within 24 hours from the time the permittee becomes aware of the circumstances. Where the information is provided orally a written submission covering these points must be provided within five working days of the time the permittee becomes aware of the circumstances covered by this paragraph.

iii. The information required in paragraph 2.5(1)6.i.(A) through (C) shall be provided to the Department within 2 hours where a discharge described under paragraphs (a)1.i. or (a)1.ii. is located upstream of a potable water intake or well field. The information required by 2.5(1)6.i.(D) through (F) shall be provided to the Department within 24 hours. If this information is provided orally a written submission covering these points must be provided within five days of the time the permittee becomes aware of the discharge.

iv. Any bypass which violates any effluent limitation in the permit shall be reported within 24 hours unless paragraphs i. through iii. are applicable. (See Section 3.10(b) below.)

v. Any upset which violates any effluent limitation in the permit shall be reported within 24 hours unless paragraphs i. through iii. are applicable.

vi. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit shall be reported within 24 hours unless paragraphs i. through iii. are applicable. (See Section 3.13(g)).

(b) Bypass

1. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure effecient operation. These bypasses are not subject to the provisions of paragraphs (b)2. and (b)3. of this section.

2. Notice.

i. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible, at least thirty (30) days before the date of the bypass.

ii. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in paragraph (a)1.iv. of this section.

3. Prohibition of bypass.

i. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:

(A) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(B) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if the permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(C) The permittee submitted notices as required under paragraph (b)2. of this section.

ii. The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three conditions listed above in paragraph (b)3.i. of this section.

(c) Upset.

1. Effect of an upset. An upset may constitute an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of paragraph (c)2. of this section are met. Where no determination was made during administrative review of claims that noncompliance was cuased by upset, and there has been no Departmental action for noncompliance, the lack of such determination is final administrative action subject to judicial review.

2. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

i. An upset occurred and that the permittee can identify the specific cause(s) of the upset;

ii. The permitted facility was at the time being properly operated; and

iii. The permittee submitted notice of the upset as required in paragraph (a) of this section.

iv. The permittee complied with any remedial measures required under 2.5(d).

B. Additional conditions applicable to specified categories of DSW permits, N.J.A.C. 7:14A-3.11.

The following conditions, in addition to those set forth in Sections 2.5, 3.10 and 3.12, apply to all DSW permits within the categories specified below:

(a) Existing manufacturing, commercial, mining, and silvicultural dischargers and research facilities. In addition to the reporting requirements under Section 2.5(1) and Section 3.10, 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:

1. 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."

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

ii. 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;

iii. Five (5) times the maximum concentration value reported for the pollutant in the permit application in accordance with Section 10.3(a)9. or Section 10.3(a)12; or

iv. The level established by the Department in accordance with Section 3.13(f).

2. 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 Sections 3.2 and 10.3(a)11.

C. Emergency plans, N.J.A.C. 7:14A-3.12.

The permittee shall submit an emergency plan report in accordance with N.J.A.C. 7:14A-3.12 or file an exemption as provided in N.J.A.C. 7:14A-3.12(e).

D. Annual permit fee, N.J.A.C. 7:14A-1.8.

The permittee shall pay the annual NJPDES permit fee which has been assessed by the Department.

A.1. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 1, 1984 and lasting through October 31, 1984, the permittee is authorized to discharge from outfall(s) serial number(s) 001.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kgs/day (lbs/day)		other units (specified)			
	Avg. Monthly	Max. Daily	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow-m^3/Day (MGD)	NA	NA	NA	NA	Daily	Grab
Temperature	NA	NA	NA	NA	Monthly	Grab
Suspended Solids	NA	NA	NA	NA	Monthly	Grab
Chemical Oxygen Demand	NA	NA	NA	NA	Monthly	Grab
Oil and Grease	NA	NA	NA	NA	Monthly	Grab
Cyanide	NA	NA	NA	NA	Monthly	Grab
Aluminum	NA	NA	NA	NA	Twice Monthly	Grab
Cadmium	NA	NA	NA	NA	Monthly	Grab
Chromium	NA	NA	NA	NA	Monthly	Grab
Copper	NA	NA	NA	NA	Monthly	Grab
Lead	NA	NA	NA	NA	Monthly	Grab
Nickel	NA	NA	NA	NA	Twice Monthly	Grab
Silver	NA	NA	NA	NA	Monthly	Grab
Zinc	NA	NA	NA	NA	Monthly	Grab
Total Toxic Organics*	NA	NA	NA	NA	Monthly	Grab

The pH shall be monitored daily by grab sample.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): at the outfall of discharge 001.

* The permitte may request a certification alternative to total toxic organics (TTO) monitoring in accordance with 40CFR433.12.

854110028

A.2. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning November 1, 1984 and lasting through July 31, 1989, the permittee is authorized to discharge from outfall(s) serial number(s) 001.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kgs/day (lbs/day)		other units (specified)			
	Avg. Monthly	Max. Daily	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow-m^3/Day (MGD)	NA	NA	NA	0.072 MGD	Daily	Grab
Temperature	NA	NA	NA	29.4°C(85°F)	Monthly	Grab
Suspended Solids	NA	NA	NA	40 mg/l	Monthly	Grab
Chemical Oxygen Demand	NA	NA	NA	NA	Monthly	Grab
Oil and Grease	NA	NA	NA	20 mg/l	Monthly	Grab
Cyanide	NA	NA	NA	0.1 mg/l	Monthly	Grab
Aluminum** ?	NA	NA	NA	N A	Twice Monthly	Grab
Cadmium	NA	NA	NA	0.02 mg/l	Monthly	Grab
Chromium	NA	NA	NA	0.1 mg/l	Monthly	Grab
Copper	NA	NA	NA	0.1 mg/l	Monthly	Grab
Lead	NA	NA	NA	0.1 mg/l	Monthly	Grab
Nickel ?	NA	NA	NA	1.0 mg/l	Twice Monthly	Grab
Silver	NA	NA	NA	0.1 mg/l	Monthly	Grab
Zinc	NA	NA	NA	0.1 mg/l	Monthly	Grab
Total Toxic Organics*	NA	NA	NA	2.13 mg/l	Monthly	Grab
Toxicity-Bioassay	NA	NA	NA	96 hour $LC_{50} \geq 50\%$ (by volume)	Quarterly	Flow through or static renewal

The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored daily by grab sample.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): at the outfall of discharge 001.

* The permittee may request a certification alternative to total toxic organics (TTO) monitoring in accordance with 40CFR433.12.

**Limitations may be imposed after review of monitoring data for one year.

854110029

A. 3. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning August 1, 1984 and lasting through July 31, 1989, the permittee is authorized to discharge from outfall(s) serial number(s) 002.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kgs/day (lbs/day)		other units (specified)			
	Avg. Monthly	Max. Daily	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow-m^3/Day (MGD)	NA	NA	NA	0.050 MGD	Monthly	Grab
BOD_5	NA	NA	NA	25 mg/l	Monthly	Grab
BOD_5 - % Removal	NA	NA	NA	85% minimum	Monthly	NA
Fecal Coliform Bacteria	NA	NA	NA	1500/100 ml	Monthly	Grab
Nitrogen (Total)	NA	NA	NA	30 mg/l	Monthly	Grab
Suspended Solids	NA	NA	NA	40 mg/l	Monthly	Grab

854110030

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored daily by grab sample.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): at the outfall of discharge 002.

B. OTHER REQUIREMENTS

The permittee shall comply with all applicable environmental regulations and specifications of the Hackensack Meadowlands Development Commission as detailed in the Commission's "Master Plan", pursuant to N.J.A.C. 19:14-6.14(g), including but not limited to the following:

The flow from any pipe, conduit, or any other source discharging into the river or its tributaries shall meet the following:

a. Such items as heavy metals, phenolic compounds, toxic substances and sodium alkyl benzene sulfonate (ABS) shall be kept to as low a value as is consistent with current technological practice representing the highest state of the art and levels consistent with recreational and primary contact water.

b. The discharge of oil or other petroleum products causing a detectable odor, a visible slick or in such quantities to injure and/or kill wildlife or marine animals in not permitted.

c. Biomonitoring Requirements

Acute Toxicity

The permittee shall conduct 96-hour definitive flow-through or definitive modified static renewal bioassay tests, conducted in replicate, of its wastewater discharge at a frequency of one test every three months. If the first four tests show no measurable acute toxicity, the permittee could petition the Department for modification of the compliance biomonitoring requirements. The first bioassay test shall be initiated no later than three (3) months from the Effective Date of Permit, unless otherwise specified by the NJDEP.

1. All bioassays shall be conducted in accordance with the following procedures:

   a. Bioassay procedure shall conform to the "Regulations Governing Laboratory Certification and Standards of Performance" (N.J.A.C. 7:18). Subchapter 6 of the regulations contains the criteria and procedures for bioassay testing and analysis. The laboratory performing your bioassay testing will have to be within the laboratory certification program.

   b. The bioassay shall provide a measure of acute toxicity as determined by the wastewater concentration which causes 50% mortality of the appropriate test organisms over a 96-hour period. Test results shall be expressed in terms of Lethal Concentration (LC) and reported as 96-hour LC-50.

   c. For receiving waters having a salinity of less than or equal to 1 part per thousand (ppt), it is recommended that the fathead minnow (*Pimephales promelas*) be used as the test organism. With receiving waters having a salinity greater than 1 ppt, the mysid shrimp (*Mysidopsis bahia*) is recommended. The test temperature shall be $22^{o}C \pm 2^{o}C$.

   Refer to N.J.A.C. 7:18-6.6 (Alternate species option).

2. The following information shall be submitted within two months from the Date of Permit:

   a. An identification of the certified bioassay laboratory responsible for the conduct of the bioassay tests.

   b. A detailed description of the methodology to be utilized in the conduct of the tests, including equipment, retention time of the wastewater in the treatment plant, collection method of a representative effluent sample, and name and source of test organisms.

   c. A schematic diagram which depicts the location that the effluent samples will be taken; the diagram shall indicate the location of effluent sampling in relation to any wastewater treatment facilities and Discharge Serial No.

3. If the results of the 96-hour bioassay indicate greater than 10% mortality in the control, the permittee shall conduct an additional 96-hour, in replicate, bioassay no later than 10 days after completion of the above-referenced test.

4. Bioassay results shall be reported on a form provided and shall be submitted within 60 days after completion of the test.

5. The information requested (2a through 2c) and the bioassay test results (4) shall be submitted to:

Bureau of Permits Administration
Water Quality Management
Division of Water Resources
CN-029
Trenton, New Jersey 08625

Bureau of Systems Analysis and
Wasteload Allocation
Division of Water Resources
CN-029
Trenton, New Jersey 08625

D. SURFACE WATER QUALITY REQUIREMENTS

The permittee shall discharge so as not to violate Surface Water Quality Standards for Dead Horse Creek classified as TW-2 Waters pursuant to N.J.A.C. 7:9-4.1 et seq., including, but not limited to, the following:

a. Floating, Colloidal and Settleable and Suspended Solids (Nonfilterable Residue); Color; Petroleum Hydrocarbons and Other Oils and Grease

1. None noticeable in the water or deposited along the shore or on the aquatic substrata in quantities detrimental to the natural biota. None which would render the waters unsuitable for the designated uses.

2. For "Petroleum Hydrocarbons", the goal is none detectable utilizing the federal EPA - Environmental Monitoring and Support Laboratory Method (Freon Extractable-Silica Gel Adsorption-Infrared Measurement); the present criteria, however, are those of Paragraph 1 above.

b. Turbidity (Nephelometric Turbidity Unit - NTU)

Maximum 30-day average of 10 NTU, a maximum of 30 NTU at any time

c. pH (Standard Units)

6.5 to 8.5

d. Temperature and Heat Dissipation Areas

No heat shall be added which would cause temperatures to deviate from ambient stream temperatures by more than 2.2°C (4°F) during September through May, nor more than 0.8°C (1.5°F) during June through August, nor shall temperatures exceed 29.4°C (85°F).

e. Toxic or Hazardous Substances

None, either alone or in combination of other substances; in such concentrations as to affect humans or be detrimental to the natural aquatic biota, produce undesirable aquatic life, or which would render the waters unsuitable for the designated uses.

E. COMPLIANCE SCHEDULE

The permittee shall achieve compliance with the effluent limitations specified in Table A.2. for discharge 001 in accordance with the following schedule:

a. The permittee shall begin installation of its industrial wastewater treatment system by two month from EDP and shall submit written notification to the New Jersey Department of Environmental Protection (NJDEP) and the U.S. Environmental Protection Agency (USEPA).

b. The permittee shall complete installation of its industrial wastewater treatment system by four months from EDP and shall submit written notification to NJDEP and USEPA.

c. The permittee shall attain operational levels of its industrial wastewater treatment system and compliance with the final effluent limitations as set forth in Table A.2. on Page 14 of this permit by five months from EDP.

F. CONTINUATION OF EXPIRING PERMITS

(a) The conditions of an expired permit are continued in force pursuant to the "Administrative Procedure Act," N.J.S.A. 52:14B-11, until the effective date of a new permit if:

1. The permittee has submitted a timely and complete application for renewal as provided in Sections 2.1 and (3.2 DSW) (4.4 IWMF) (5.8 UIC) and Subchapter 10; and

2. The Department through no fault of the permittee, does not issue a new permit with an effective date under Section 8.6 on or before the expiration date of the previous permit (e.g., when issuance is impracticable due to time or resource constraints).

(b) Permits continued under this section remain fully effective and enforceable.

(c) Enforcement. When the permittee is not in compliance with the conditions of the expiring or expired permit the Department may choose to do any or all of the following:

1. Initiate enforcement action based upon the permit which has been continued;

2. Issue a notice of intent to deny the new permit under Section 8.1. If the permit is denied, the owner or operator would then be required to cease the activities authorized by the continued permit or be subject to enforcement action for operating without a permit;

3. Issue a new permit under Subchapters 7 and 8 with appropriate conditions; or

4. Take other actions authorized by these regulations or the State Act.

Exhibit 5b

BEFORE COPYING FORM, ENTER:

SITE NAME Goody Products, Inc.
Kearny, New Jersey

EPA ID NO. NJD 001 340 816

1992 Hazardous Waste Report

FORM **IC**

IDENTIFICATION AND CERTIFICATION

1992

INSTRUCTIONS: Read the detailed instructions beginning on page 6 of the 1992 Hazardous Waste Report booklet before completing this form.

SEC. I Site name and location address. Complete items A through H. Check the box ☒ in items A, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 6

A. EPA ID No. — Same as label ☐ or → NJD 001 340 816

B. County: Hudson

C. Site/company name — Same as label ☐ or → Goody Products, Inc.

D. Has the site name associated with this EPA ID changed since 1989? ☐ 1 Yes ☒ 2 No

E. Street name and number. If not applicable, enter industrial park, building name or other physical location description. — Same as label ☐ → 969 Newark Turnpike

F. City, town, village, etc. — Same as label ☐ → Kearny

G. State — Same as label ☐: NJ

H. Zip Code — Same as label ☐: 07032 –

SEC. II Mailing address of site. Instruction page 6

Is the mailing address the same as the location address? ☒ 1 Yes (SKIP TO SEC. III) ☐ 2 No (GO TO BOX B)

A. Number and street name of mailing address

B. City, town, village, etc.

C. State

D. Zip Code –

SEC. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 6

Please print: Last name: Lanier; First name: Tim; M.I.: S.

B. Title: Manager of Environmental Operations

C. Telephone: 706 846 – 8481; Extension: 251

SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 7

A. 3965 B. C. D.

SEC. V "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Please print: Last name: Krause; First name: Mike; M.I.:

B. Title: Senior Vice President of Operations

Signature: [signature]

D. Date of signature: 06 06 93 (MO. DAY YR.)

854110037

OVER →

BEFORE COPYING FORM, ENTER:

SITE NAME: Goody Products, Inc.
Kearny, New Jersey

EPA ID NO. NJD 001 340 876

854110038

1992 Hazardous Waste Report

FORM **GM**

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1992 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description, Instruction Page 15: Caustic, rinse waters from electroplating, high pH.

B. EPA hazardous waste code, Page 15: D002

C. State hazardous waste code, Page 15: D002

D. SIC code, Page 18: 3965

E. Origin code, Page 18: 1 — System type: M

F. Source code, Page 17: A03

G. Point of measurement, Page 17: 1

H. Form code, Page 17: B1096

I. RCRA-radioactive mixed, Page 17: 2

J. Reported TRI constituent, Page 18: 3

K. CAS numbers, Page 18: Nickel Compounds, N.O.S.
1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in 1991, Instruction Page 18: 115000.

B. Quantity generated in 1992, Page 18: 92000.

C. UOM, Page 19: 5 — Density: Don't know — ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19
☒ 1 Yes (CONTINUE TO SYSTEM 1)
☐ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1
On-site system type, Page 19: M07
Quantity treated, disposed or recycled on site in 1992: 92000.

ON-SITE SYSTEM 2
On-site system type, Page 19: M
Quantity treated, disposed or recycled on site in 1992:

Sec. III

A. Was any of this waste shipped off site in 1992? Instruction Page 20
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to, Page 20	C. System type shipped to, Page 20	D. Off-site availability code, Page 21	E. Total quantity shipped in 1992, Page 21
Site 1		M		
Site 2		M		

Sec. IV

A. Did new activities in 1992 result in minimization of this waste? Instruction Page 22
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity, Page 22	C. Other effects, Page 22	D. Quantity recycled in 1992 due to new activities, Page 23	E. Activity/production index, Page 23	F. 1992 Source reduction quantity, Page 24
W W W W	☐ 1 Yes ☐ 2 No		0.8	

Comments:

BEFORE COPYING FORM, ENTER:

SITE NAME: Goody Products, Inc.
Kearny, New Jersey

EPA ID NO. NJ D 001 3 4 0 8 76

854110039

1992 Hazardous Waste Report

FORM **GM**

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1992 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description, Instruction Page 15: Caustic rinse water from coating stripping operations, high pH, Glycol Ethers.

B. EPA hazardous waste code, Page 15: D002

C. State hazardous waste code, Page 15: D002

D. SIC code, Page 16: 3965

E. Origin code, Page 16: 1 — System type: M

F. Source code, Page 17: A01

G. Point of measurement, Page 17: 1

H. Form code, Page 17: B196

I. RCRA-radioactive mixed, Page 17: 2

J. Reported TRI constituent, Page 18: 3

K. CAS numbers, Page 18: Glycol Ethers, N.O.S.
1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in 1991, Instruction Page 18: 1610000.

B. Quantity generated in 1992, Page 18: 1880000.

C. UOM, Page 19: 5 — Density: Don't know — ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19
☒ 1 Yes (CONTINUE TO SYSTEM 1)
☐ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1
On-site system type, Page 19: M07
Quantity treated, disposed or recycled on site in 1992: 1880000.

ON-SITE SYSTEM 2
On-site system type, Page 19: M
Quantity treated, disposed or recycled on site in 1992:

Sec. III

A. Was any of this waste shipped off site in 1992? Instruction Page 20
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to, Page 20	C. System type shipped to, Page 20	D. Off-site availability code, Page 21	E. Total quantity shipped in 1992, Page 21
Site 1		M		
Site 2		M		

Sec. IV

A. Did new activities in 1992 result in minimization of this waste? Instruction Page 22
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity, Page 22	C. Other effects, Page 22	D. Quantity recycled in 1992 due to new activities, Page 23	E. Activity/production index, Page 23	F. 1992 Source reduction quantity, Page 24
W W W W	☐ 1 Yes ☐ 2 No		.8	

Comments:

BEFORE COPYING FORM, ENTER: *

SITE NAME Goody Products, Inc.
Kearny, New Jersey

EPA ID NO. NJD 001 340 876

854110040

1992 Hazardous Waste Report

FORM **GM**

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1992 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description Instruction Page 15: Acidic, metal bearing, rinse water from electroplating line, low pH (Nickel).

B. EPA hazardous waste code Page 15: D002

C. State hazardous waste code Page 15: D002

D. SIC code Page 18: 3965

E. Origin code Page 16: 1
System type: M

F. Source code Page 17: A22

G. Point of measurement Page 17: 1

H. Form code Page 17: B703

I. RCRA-radioactive mixed Page 17: 2

J. Reported TRI constituent Page 18: 3

K. CAS numbers Page 18: Nickel Compounds, N.O.S.
1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in 1991 Instruction Page 18: 2300000.

B. Quantity generated in 1992 Page 18: 1840000.

C. UOM Page 19: 5 Density: Don't know
☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19
☒ 1 Yes (CONTINUE TO SYSTEM 1)
☐ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1
On-site system type Page 19: M077
Quantity treated, disposed or recycled on site in 1992: 1840000.

ON-SITE SYSTEM 2
On-site system type Page 19: M
Quantity treated, disposed or recycled on site in 1992:

Sec. III

A. Was any of this waste shipped off site in 1992? Instruction Page 20
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 20	C. System type shipped to Page 20	D. Off-site availability code Page 21	E. Total quantity shipped in 1992 Page 21
Site 1		M		
Site 2		M		

Sec. IV

A. Did new activities in 1992 result in minimization of this waste? Instruction Page 22
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 22	C. Other effects Page 22	D. Quantity recycled in 1992 due to new activities Page 23	E. Activity/production index Page 23	F. 1992 Source reduction quantity Page 24
W W W W	☐ 1 Yes ☐ 2 No		0.8	

Comments:

854110041

BEFORE COPYING FORM, ENTER:

SITE NAME: Goody Products, Inc.

Kearny, New Jersey

EPA ID NO. NJD001340876

1992 Hazardous Waste Report

FORM **GM**

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1992 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 15): Caustic rinse waters from metal burnishing (Nickel, Lead, Copper, Zinc) high pH.

B. EPA hazardous waste code (Page 15): D002

C. State hazardous waste code (Page 15): D002

D. SIC code (Page 16): 3965

E. Origin code (Page 16): 1

System type: M

F. Source code (Page 17): A03

G. Point of measurement (Page 17): 1

H. Form code (Page 17): B196

I. RCRA-radioactive mixed (Page 17): 2

J. Reported TRI constituent (Page 18): 3

K. CAS numbers (Page 18): Nickel Compounds, N.O.S.

1. ____-__-__ 2. ____-__-__ 3. ____-__-__ 4. ____-__-__ 5. ____-__-__

Sec. II

A. Quantity generated in 1991 (Instruction Page 18): 70,000.0

B. Quantity generated in 1992 (Page 18): 56,000.0

C. UOM (Page 19): 5 Density: Don't know ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (Page 19)
☒ 1 Yes (CONTINUE TO SYSTEM 1)
☐ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1

On-site system type (Page 19): M017

Quantity treated, disposed or recycled on site in 1992: 56,000.0

ON-SITE SYSTEM 2

On-site system type (Page 19): M

Quantity treated, disposed or recycled on site in 1992:

Sec. III

A. Was any of this waste shipped off site in 1992? (Instruction Page 20)
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to (Page 20)	C. System type shipped to (Page 20)	D. Off-site availability code (Page 21)	E. Total quantity shipped in 1992 (Page 21)
Site 1		M		
Site 2		M		

Sec. IV

A. Did new activities in 1992 result in minimization of this waste? (Instruction Page 22)
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 22)	C. Other effects (Page 22)	D. Quantity recycled in 1992 due to new activities (Page 23)	E. Activity/production index (Page 23)	F. 1992 Source reduction quantity (Page 24)
W W W W	☐ 1 Yes ☐ 2 No		.8	

Comments:

BEFORE COPYING FORM, ENTER:

SITE NAME: Goody Products, Inc.

Kearny, New Jersey

EPA ID NO.: NJP 001 340 876

854110042

1992 Hazardous Waste Report

FORM **GM**

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1992 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description Instruction Page 15: Toxic, solid, filter cake generated from chemical precipitation of electroplating operations (Nickel).

B. EPA hazardous waste code Page 15: F006 D006

C. State hazardous waste code Page 15:

D. SIC code Page 16: 3965

E. Origin code Page 16: 5 System type: M077

F. Source code Page 17: A75

G. Point of measurement Page 17: 2

H. Form code Page 17: B502

I. RCRA-radioactive mixed Page 17: 2

J. Reported TRI constituent Page 18: 3

K. CAS numbers Page 18: Glycol Ethers, N.O.S., Nickel Compounds, N.O.S.
1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in 1991 Instruction Page 18: 139000.

B. Quantity generated in 1992 Page 18: 59980.

C. UOM Page 19: 1 Density: . ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19
☒ 1 Yes (CONTINUE TO SYSTEM 1)
☐ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1
On-site system type Page 19: M
Quantity treated, disposed or recycled on site in 1992: .

ON-SITE SYSTEM 2
On-site system type Page 19: M
Quantity treated, disposed or recycled on site in 1992: .

Sec. III

A. Was any of this waste shipped off site in 1992? Instruction Page 20
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

Site	B. EPA ID No. of facility waste was shipped to Page 20	C. System type shipped to Page 20	D. Off-site availability code Page 21	E. Total quantity shipped in 1992 Page 21
1	PAD 981 098 227	M013	1	59980.
2		M		.

Sec. IV

A. Did new activities in 1992 result in minimization of this waste? Instruction Page 22
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 22	C. Other effects Page 22	D. Quantity recycled in 1992 due to new activities Page 23	E. Activity/production index Page 23	F. 1992 Source reduction quantity Page 24
W13 W14 W19 W	☐ 1 Yes ☐ 2 No	NA.	0.78	51220.

Comments: IV.B. W19. Reduced plating drag-out. Reduced coagulant in treatment. Worked fewer hours.

BEFORE COPYING FORM, ENTER:

SITE NAME: Goody Products, Inc.
Kearny, New Jersey

EPA ID NO. NJD 001 3410 8716

854110043

1992 Hazardous Waste Report

FORM **GM**

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1992 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description, Instruction Page 15: Flammable waste paint related lacquers and solvents from coating operations (alcohols, glycols).

B. EPA hazardous waste code, Page 15: F003

C. State hazardous waste code, Page 15:

D. SIC code, Page 16: 3965

E. Origin code, Page 16: 1 — System type: M

F. Source code, Page 17: A21

G. Point of measurement, Page 17: 2

H. Form code, Page 17: B2019

I. RCRA-radioactive mixed, Page 17: 2

J. Reported TRI constituent, Page 18: 2

K. CAS numbers, Page 18: 1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in 1991, Instruction Page 18: 7800.

B. Quantity generated in 1992, Page 18: 10197.

C. UOM, Page 19: 1 — Density: . ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19
☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1
On-site system type, Page 19: M
Quantity treated, disposed or recycled on site in 1992:

ON-SITE SYSTEM 2
On-site system type, Page 19: M
Quantity treated, disposed or recycled on site in 1992:

Sec. III

A. Was any of this waste shipped off site in 1992? Instruction Page 20
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to, Page 20	C. System type shipped to, Page 20	D. Off-site availability code, Page 21	E. Total quantity shipped in 1992, Page 21
Site 1	NJD 002 182 897	M041	1	10197.
Site 2		M		

Sec. IV

A. Did new activities in 1992 result in minimization of this waste? Instruction Page 22
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity, Page 22	C. Other effects, Page 22	D. Quantity recycled in 1992 due to new activities, Page 23	E. Activity/production index, Page 23	F. 1992 Source reduction quantity, Page 24
W W W W	☐ 1 Yes ☐ 2 No	0.	0.81	NA

Comments:

854110044

BEFORE COPYING FORM, ENTER:

SITE NAME: Goody Products, Inc.

Kearny, New Jersey

EPA ID NO. NJD 001 340 876

1992 Hazardous Waste Report

FORM **GM**

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1992 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 15): Combustible liquid generated from parts cleaning or oil/water seperator (oil/mineral spirits).

B. EPA hazardous waste code (Page 15): D001, D018, D039

C. State hazardous waste code (Page 15):

D. SIC code (Page 16): 3965

E. Origin code (Page 16): 1; System type: M

F. Source code (Page 17): A08

G. Point of measurement (Page 17): 2

H. Form code (Page 17): B211

I. RCRA-radioactive mixed (Page 17): 2

J. Reported TRI constituent (Page 18): 2

K. CAS numbers (Page 18): 1. ___ 2. ___ 3. ___ 4. ___ 5. ___

Sec. II

A. Quantity generated in 1991 (Instruction Page 18): 3570.

B. Quantity generated in 1992 (Page 18): 1433.

C. UOM (Page 19): 1; Density: ___ ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (Page 19)
☐ 1 Yes (CONTINUE TO SYSTEM I)
☒ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1
On-site system type (Page 19): M
Quantity treated, disposed or recycled on site in 1992: ___

ON-SITE SYSTEM 2
On-site system type (Page 19): M
Quantity treated, disposed or recycled on site in 1992: ___

Sec. III

A. Was any of this waste shipped off site in 1992? (Instruction Page 20)
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to (Page 20)	C. System type shipped to (Page 20)	D. Off-site availability code (Page 21)	E. Total quantity shipped in 1992 (Page 21)
Site 1	NJD 092 182 897	M041	1	1433.
Site 2		M		

Sec. IV

A. Did new activities in 1992 result in minimization of this waste? (Instruction Page 22)
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 22)	C. Other effects (Page 22)	D. Quantity recycled in 1992 due to new activities (Page 23)	E. Activity/production index (Page 23)	F. 1992 Source reduction quantity (Page 24)
W W W W	☐ 1 Yes ☐ 2 No	0.	9.8	NA

Comments:

BEFORE COPYING FORM, ENTER:

SITE NAME Goody Products, Inc.

Kearny, New Jersey

EPA ID NO. N J D 0 0 1 3 4 0 8 7 6

1992 Hazardous Waste Report

FORM **01**

OFF-SITE IDENTIFICATION

INSTRUCTIONS: Read the detailed instructions on the back of this page before completing this form.

A. EPA ID No. of off-site installation or transporter	B. Name of off-site installation or transporter
PA D 9 8 1 0 9 8 2 2 7	World Resources, Inc.
handler type (CHECK ALL THAT APPLY): ☐ Generator ☐ Transporter ☒ TSDR	C. Address of off-site installation: Street Walnut Lane; City Pottsville; State PA; Zip Code 1 7 9 0 1 –

A. EPA ID No. of off-site installation or transporter	B. Name of off-site installation or transporter
P A D 0 0 9 3 3 2 7 4 5	BES Environmental Specialists
handler type (CHECK ALL THAT APPLY): ☐ Generator ☒ Transporter ☐ TSDR	C. Address of off-site installation: Street Don't know; City ; State ; Zip Code –

A. EPA ID No. of off-site installation or transporter	B. Name of off-site installation or transporter
N J D 0 0 2 1 8 2 8 9 7	Safety Kleen
handler type (CHECK ALL THAT APPLY): ☐ Generator ☒ Transporter ☒ TSDR	C. Address of off-site installation: Street 1200 Sylvan Street; City Linden; State N J; Zip Code 0 7 0 3 6 –

A. EPA ID No. of off-site installation or transporter	B. Name of off-site installation or transporter
handler type (CHECK ALL THAT APPLY): ☐ Generator ☐ Transporter ☐ TSDR	C. Address of off-site installation: Street ; City ; State ; Zip Code –

A. EPA ID No. of off-site installation or transporter	B. Name of off-site installation or transporter
handler type (CHECK ALL THAT APPLY): ☐ Generator ☐ Transporter ☐ TSDR	C. Address of off-site installation: Street ; City ; State ; Zip Code –

Comments:

854110045

BEFORE COPYING FORM, ENTER:

SITE NAME: Goody Products, Inc.
Kearny, New Jersey

EPA ID NO. NJD 001 340 816

1992 Hazardous Waste Report

FORM PS

WASTE TREATMENT, DISPOSAL, OR RECYCLING PROCESS SYSTEMS

INSTRUCTIONS: Read the detailed instructions beginning on page 32 of the 1992 Hazardous Waste Report booklet before completing this form.

A. Waste treatment, disposal or recycling system description
Instruction Page 38
Chemical precipitation and neutralization of metal-bearing waste water.

B. System type Page 38	C. Regulatory status Page 38	D. Operational status Page 39	E. Unit types Page 39
M07 7	02	01	01

A. 1992 influent quantity
Instruction Page 40

		UOM	Density
Total	5200000.	5	Don't know
RCRA		☐ 1 lbs/gal ☐ 2 sg	
State			

B. Maximum operational capacity
Page 41

Total	1700000.
RCRA	
State	

C. 1992 liquid effluent quantity
Page 42

		UOM	Density
Total	52000000.	5	Don't know
RCRA		☐ 1 lbs/gal ☐ 2 sg	
State			

D. 1992 solid/sludge residual quantity
Page 43

		UOM	Density
Total	5998 0.	1	.
RCRA		☐ 1 lbs/gal 2 ☐ sg	
State			

Limitations on maximum operational capacity Page 44	F. Commercial capacity availability code Page 44	G. Percent capacity commercially available Page 45
1. 09 2. 3.	1	0 %

A. Planned change in maximum operational capacity
Instruction Page 45

☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. New maximum operational capacity
Page 45

		UOM
Total		
RCRA		
State		

Planned year of change Page 46	D. Future commercial capacity availability code Page 46	E. Percent future capacity commercially available Page 46
19		%

Comments: II.C. Estimated.

854110046

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1994 Hazardous Waste Report

FORM IC

IDENTIFICATION AND CERTIFICATION

1994

INSTRUCTIONS: Read the detailed instructions beginning on page 9 of the 1994 Hazardous Waste Report booklet before completing this form

Sec. I Site name and location address. Complete A through H. Instruction page 10.

A. EPA ID No. NJD 001 340 876

B. County Hudson

C. Site/company name Goody Products, Inc.

D. Has the site name associated with this EPA ID changed since 1993?
☐ 1 Yes
☒ 2 No

E. Street name and number. If not applicable, enter industrial park, building name, or other physical location description.
969 Newark Turnpike

F. City, town, village, etc. Kearny

G. State NJ

H. Zip Code 07032

Sec. II Mailing address of site. Instruction page 10.

A. Is the mailing address the same as the location address?
☒ 1 Yes (SKIP TO SEC. III)
☐ 2 No (GO TO BOX B)

B. Number and street name of mailing address

C. City, town, village, etc.

D. State

E. Zip Code

Sec. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page

A. Please print: Last Name Schultz First Name Peter M.I. J.

B. Title Director

C. Telephone 815 969 6151
Extension

Sec. IV I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordai with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information including the possibility of fine and imprisonment for knowing violations."

A. Please print: Last Name Schultz First Name Peter M.I. J.

B. Title Director, Environmental

C. Signature Peter J. Schultz

D. Date of signature 01 24 95
MO. DAY YR.

854110047

Sec.V - Generator Status

EPA ID NO. NJD001340876

A. 1993 RCRA generator status Instruction page 10. (CHECK ONE BOX BELOW)	B. Reason for not generating Page 12. (CHECK ALL THAT APPLY)	
☒ 1 USLQG ☐ 2 USSQG or NJLQG ☐ 3 USCESQG or NJSQG ☐ 4 Non generator (Continue to Box B)	☐ 1 Never generated ☐ 2 Out of business ☐ 3 Only excluded or delisted waste ☐ 4 Only non-hazardous waste	☐ 5 Periodic or occasional generator ☐ 6 Waste minimization activity ☐ 7 Other (SPECIFY COMMENTS IN BOX BELOW)

Sec.VI - On-Site Waste Management Status

A. Storage subject to hazardous waste permitting beyond 90 days requirements Page 13.	B. Treatment, disposal, or recycling subject to hazardous waste permitting requirements Page 13.	C. Hazardous waste-exempt treatment, disposal, or recycling Page 13.
1	1	3

Sec.VII - Waste Minimization Activity during 1993 or 1994

A. Did this site begin or expand a source reduction activity during 1993 or 1994? Page 14.	B. Did this site begin or expand a recycling activity during 1993 or 1994? Page 15.	C. Did this site systematically investigate opportunities for source reduction or recycling during 1993 or 1994? Page 15.
☐ 1 Yes ☒ 2 No	☐ 1 Yes ☒ 2 No	☐ 1 Yes ☒ 2 No

D. Did this site have a successful waste minimization program during 1993 or 1994? Page 15

☐ 1 Yes (Must continue to Box E)
☒ 2 No

E. Can this site quantitatively document its success for 1993 or 1994? Page 15

☐ 1 Yes
☐ 2 No

Comments: Manufacturing operations ceased May 13, 1994

854110048

854110049

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Grady Products, INC.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1994 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: **Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.**

Sec. I A. Waste description Instruction page 18. Filter cake from metals treatment of waste water.

B. EPA hazardous waste code Page 19. F006

C. State hazardous waste code Page 19. F006

D. SIC code Page 19.	E. Origin code Page 19.	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 System type M	A 75	2	B 502	2

Sec. II

A. Quantity generated in 1993 Instruction Page 21.	B. Quantity generated in 1994 Page 21.	C. UOM Page 21.	D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
52920	29860	1 DON'T KNOW ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994	On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994
M		M	

Sec. III A. Was any of this waste shipped off-site in 1994 Instruction Page 23. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1994
Site 1	PAD 981 038 227	M 013	1	29160
Site 2	NCD 980 842 132	M 019	1	700

Sec. IV A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23. ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94

NJA1881814	03/02/94
PAE 0417185	02/15/94
PAE 0417163	05/23/94
PAC 4013586	07/06/94

854110050

854110051

FORM GM

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, INC.

EPA ID NO: NJD 001 340 876

FORM GM

1994 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: **Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.**

Sec. I A. Waste description - instruction page 18. Oil soaked corn cob sorbant.

B. EPA hazardous waste code Page 19. D018

C. State hazardous waste code Page 19. X726

D. SIC code Page 19.	E. Origin code Page 19.	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 System type M	A 51	1	B 409	2

Sec. II A. Quantity generated in 1993 Instruction Page 21. 418

B. Quantity generated in 1994 Page 21. 780

C. UOM Page 21. 1 Density DON'T KNOW ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site system type Page 22. M

Quantity treated, disposed or recycled on site in 1994

ON-SITE PROCESS SYSTEM 2

On-site system type Page 22. M

Quantity treated, disposed or recycled on site in 1994

Sec. III A. Was any of this waste shipped off-site in 1994 Instruction Page 23.
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1994
Site 1	KYD 053 348 108	M 041	1	780
Site 2		M		

Sec. IV A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23.
☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94
NJA1954199	12/20/94

854110052

854110053

FORM GM

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

FORM GM

1994 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.

Sec. I A. Waste description - Instruction page 18. Waste paint related material. ERG #26.

B. EPA hazardous waste code Page 19. F003 D001

C. State hazardous waste code Page 19. NA

D. SIC code Page 19.	E. Origin code Page 19. System type	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 M	A 21	2	B 203	2

Sec. II A. Quantity generated in 1993 Instruction Page 21. 9999

B. Quantity generated in 1994 Page 21. 5629

C. UOM Page 21. 1 Density DON'T KNOW ☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site system type Page 22. M

Quantity treated, disposed or recycled on site in 1994

ON-SITE PROCESS SYSTEM 2

On-site system type Page 22. M

Quantity treated, disposed or recycled on site in 1994

Sec. III A. Was any of this waste shipped off-site in 1994 Instruction Page 23.
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1994
Site 1	KYD 053 348 108	M 041	1	650
Site 2	NJD 002 182 897	M 041	1	4979

Sec. IV A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23.
☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94
NJA 1820014	04/12/94
NJA 1641192	01/06/94
NJA 1843217	05/25/94
NJA 1917686	10/03/94

854110054

854110055

FORM GM

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

FORM GM

1994 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18. Naphtha based degreaser. ERG #27

B. EPA hazardous waste code Page 19. D001

C. State hazardous waste code Page 19. NA

D. SIC code Page 19.	E. Origin code Page 19.	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 System type M	A 09	2	B 203	2

Sec. II

A. Quantity generated in 1993 Instruction Page 21.	B. Quantity generated in 1994 Page 21.	C. UOM Density Page 21.	D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
2257.5	1983.	1 7.50 ☒ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site system type Page 22. M

Quantity treated, disposed or recycled on site in 1994

ON-SITE PROCESS SYSTEM 2

On-site system type Page 22. M

Quantity treated, disposed or recycled on site in 1994

Sec. III

A. Was any of this waste shipped off-site in 1994 Instruction Page 23. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1994
Site 1	KYD 053 348 108	M041	1	1780.
Site 2	NJD 002 182 897	M041	1	9785.

Sec. IV

A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23. ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Site 3. NJD000768093 M041 1 418.

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94

NJA 1820014	04/12/94
NJA 1954199	12/20/94
NJA 1821024	08/11/94
NJA 1843217	05/25/94
NJA 1917686	10/03/94
NJA 1943621	08/02/94
NJA 1840022	02/23/94
NJA 1923628	05/19/94

854110056

854110057

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody PRODUCTS, INC.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1994 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: **Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.**

Sec. I A. Waste description - Instruction page 18. Waste Paint.

B. EPA hazardous waste code Page 19. D001

C. State hazardous waste code Page 19. NA

D. SIC code Page 19.	E. Origin code Page 19.	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 System type M	A 21	1	B 209	2

Sec. II

A. Quantity generated in 1993 Instruction Page 21.	B. Quantity generated in 1994 Page 21.	C. UOM Page 21. Density	D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
0	1200	1 DON'T KNOW ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994	On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994
M		M	

Sec. III A. Was any of this waste shipped off-site in 1994 Instruction Page 23. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 199
Site 1	NCD 980 842 132	M 041	1	1200
Site 2		M		

Sec. IV A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23. ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94
NJA1881814	03/02/94

854110058

854110059

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1994 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.

Sec. I A. Waste description - Instruction page 18. Oily materials such as rags.

B. EPA hazardous waste code Page 19. NA

C. State hazardous waste code Page 19. X722

D. SIC code Page 19.	E. Origin code Page 19. System type	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 / M	A 92	1	B 409	2

Sec. II

A. Quantity generated in 1993 Instruction Page 21.	B. Quantity generated in 1994 Page 21.	C. UOM Page 21. Density	D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
1516.	400.	1 / DON'T KNOW ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994	On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994
M		M	

Sec. III A. Was any of this waste shipped off-site in 1994 Instruction Page 23. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 19
Site 1	NCD 980 842 132	M	1	400.
Site 2		M		

Sec. IV A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23. ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments: Floor sweepings, etc.

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94
NJA 1881814	03/02/94

854110060

854110061

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1994 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.
Waste alkaline tank solution.

B. EPA hazardous waste code Page 19.
D002

C. State hazardous waste code Page 19.
NA

D. SIC code Page 19.	E. Origin code Page 19.	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 System type M	A 57	1	B 109	2

Sec. II

A. Quantity generated in 1993 Instruction Page 21.	B. Quantity generated in 1994 Page 21.	C. UOM Page 21. Density	D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
0	6747	1 DON'T KNOW ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994	On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994
M		M	

Sec. III

A. Was any of this waste shipped off-site in 1994 Instruction Page 23. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 199
Site 1	NJD 002 182 897	M 121	1	6747
Site 2		M		

Sec. IV

A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23. ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94
NJA 1954105	10/26/94

854110062

854110063

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1994 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1994 Hazardous Waste Report Booklet before completing this form.

Sec. I A. Waste description - Instruction page 18. Rinse & wash waste water from electroplating.

B. EPA hazardous waste code Page 19. D002

C. State hazardous waste code Page 19. NA

D. SIC code Page 19.	E. Origin code Page 19.	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA-radioactive mixed Page 20.
3965	1 System type M	A 22	1	B 103	2

Sec. II

A. Quantity generated in 1993 Instruction Page 21.	B. Quantity generated in 1994 Page 21.	C. UOM Density Page 21.	D. Did this site do any of the following to the waste; treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
4222000.	1950000.	5 8.4 ☒ 1 lbs/gal ☐ 2 sg	☒ 1 Yes (CONTINUE TO SYSTEM 1) ☐ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994	On-site system type Page 22.	Quantity treated, disposed or recycled on site in 1994
M		M	

Sec. III A. Was any of this waste shipped off-site in 1994 Instruction Page 23. ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to. Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 19
Site 1		M		
Site 2		M		

Sec. IV A. Did new activities in 1994 result in minimization of this waste: Instruction Page 23. ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 24.	D. Quantity recycled in 1994 due to new activities Page 25.	E. Activity/ production index Page 24.	F. 1994 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Attachment

Attach a list of hazardous waste manifests for this form. The list must include the uniform hazardous waste manifest document number and the date of the shipment. The back of Form GM may be used for this purpose.

Example:

Document Number	Date Shipped
NJA123456	01/01/94
NJA123457	12/31/94

854110064

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

FORM PS

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1994 Hazardous Waste Report

WASTE TREATMENT, DISPOSAL, OR RECYCLING PROCESS SYSTEMS

INSTRUCTIONS: **Read the detailed instructions beginning on page 33 of the 1994 Hazardous Waste Report booklet before completing this form.**

Sec. I A. Waste treatment, disposal, or recycling system description Instruction Page 38.

B. System type Page 38.	C. Regulatory status Page 39.	D. Operational status Page 39.	E. Unit types Page 39.
M 077	02	01	01

Sec. II

A. 1994 influent quantity Instruction Page 40.

		UOM	Density
Total	1950000	5	8.4
RCRA		☒ 1 lbs/gal ☐ 2 sg	
State			

B. Maximum operational capacity Page 41.

Total	17020000
RCRA	
State	

C. 1994 liquid effluent quantity Instruction Page 42.

		UOM	Density
Total	1950000	5	8.4
RCRA		☒ 1 lbs/gal ☐ 2 sg	
State			

D. 1994 solid/sludge residual quantity Page 42. DON'T KNO

		UOM	Density
Total		1	
RCRA		☐ 1 lbs/gal ☐ 2 sg	
State			

E. Limitation on maximum operational capacity Page 43.	F. Commercial capacity availability code Page 43.	G. Percent capacity commercially available Page 43.
1. 01 2. 02 3.	1	0 %

854110065

1995

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

FORM IC

IDENTIFICATION AND CERTIFICATION

1995

INSTRUCTIONS: Read the detailed instructions beginning on page 9 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I Site name and location address. Complete A through H. Check the box ☐ in items A, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 10.

A. EPA ID No. Same as label ☐ or → NJD 001 340 876	B. County Hudson
C. Site/company name Same as label ☐ or → Goody Products, Inc.	D. Has the site name associated with this EPA ID changed since 1993? ☐ 1 Yes ☒ 2 No
E. Street name and number. If not applicable, enter industrial park, building name, or other physical location description. Same as label ☐ or → 969 Newark Turnpike	
F. City, town, village, etc. Same as label ☐ or → Kearny	G. State Same as label NJ / H. Zip Code Same as label 07032

Sec. II Mailing address of site. Instruction page 10.

A. Is the mailing address the same as the location address? ☒ 1 Yes (SKIP TO SEC. III) ☐ 2 No (GO TO BOX B)

B. Number and street name of mailing address

C. City, town, village, etc. / D. State / E. Zip Code

Sec. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 10.

A. Please print: Last Name	First name	M.I.	B. Title	C. Telephone
Schultz	Peter	J.	Director	875 969-6151 Extension

Sec. IV "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."

A. Please print: Last Name	First name	M.I.	B. Title
Schultz	Peter	J.	Director, Environmental Affairs

C. Signature: Peter J. Schultz

D. Date of signature: 03 26 96 (MO. DAY YR.)

Over →

854110066

EPA ID NO: NJD 001 340 876

Sec.V - Generator Status. Instruction pages 10, 12.

A. 1995 generator status (CHECK ONE BELOW)	B. Reason for not generating (CHECK ALL THAT APPLY)	
X 1 USLQG	☐ 1 Never generated	☐ 5 Periodic or occasional generator
☐ 2 USSQG/NJLQG — SKIP to SEC. VI	☐ 2 Out of business	☐ 6 Waste minimization activity
☐ 3 USCESQG/NJSQG	☐ 3 Only excluded or delisted waste	☐ 7 Other (SPECIFY COMMENTS IN BOX BELOW)
☐ 4 Non generator (Continue to Box B)	☐ 4 Only non-hazardous waste	

Sec.VI - On-Site Waste Management Status. Instruction pages 13, 14.

A. Storage subject to permitting requirements	B. Treatment, disposal, or recycling subject to permitting requirements	C. Exempt treatment, disposal, or recycling
1	1	1

Sec.VII - Waste Minimization Activity during 1994 or 1995. Instruction pages 14, 15.

A. Did this site begin or expand a source reduction activity during 1994 or 1995?	B. Did this site begin or expand a recycling activity during 1994 or 1995?	C. Did this site systematically investigate opportunities for source reduction or recycling during 1994 or 1995?
☐ 1 Yes	☐ 1 Yes	☐ 1 Yes
X 2 No	X 2 No	X 2 No

D. Did any of the factors listed below delay or limit this site's ability to initiate new or additional source reduction activities in 1994 or 1995? (CHECK YES OR NO FOR EACH ITEM)

Yes	No		
☐ 1	X 2	a.	Insufficient capital to install new source reduction equipment or implement new source reduction practices
☐ 1	X 2	b.	Lack of technical information on source reduction techniques applicable to the specific production processes
☐ 1	X 2	c.	Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment
☐ 1	X 2	d.	Concern that product quality may decline as a result of source reduction
☐ 1	X 2	e.	Technical limitations of the production processes
☐ 1	X 2	f.	Permitting burdens
☐ 1	X 2	g.	Source reduction previously implemented - additional reduction does not appear to be technically feasible
☐ 1	X 2	h.	Source reduction previously implemented - additional reduction does not appear to be economically feasible
☐ 1	X 2	i.	Source reduction previously implemented - additional reduction does not appear to be feasible due to permitting requirements
X 1	☐ 2	j.	Other (SPECIFY COMMENTS IN BOX BELOW)

E. Did any of the factors listed below delay or limit the site's ability to initiate new or additional on-site or off-site recycling activities during 1994 or 1995? (CHECK YES OR NO FOR EACH ITEM)

Yes	No		
☐ 1	X 2	a.	Insufficient capital to install new recycling equipment or implement new recycling practice
☐ 1	X 2	b.	Lack of technical information on recycling techniques applicable to this site's specific production process
☐ 1	X 2	c.	Recycling is not economically feasible: cost savings in waste management will not recover the capital investment
☐ 1	X 2	d.	Concern that product quality may decline as a result of recycling
☐ 1	X 2	e.	Requirements to manifest wastes inhibit shipments of off-site for recycling
☐ 1	X 2	f.	Financial liability provisions inhibit shipments off-site for recycling
☐ 1	X 2	g.	Technical limitations of production processes inhibit shipments off-site for recycling
☐ 1	X 2	h.	Technical limitations of production processes inhibit on-site recycling
☐ 1	X 2	i.	Permitting burdens inhibit recycling
☐ 1	X 2	j.	Lack of permitted off-site recycling facilities
☐ 1	X 2	k.	Unable to identify a market for recycled materials
☐ 1	X 2	l.	Recycling previously implemented - additional recycling does not appear to be technically feasible
☐ 1	X 2	m.	Recycling previously implemented - additional recycling does not appear to be economically feasible
☐ 1	X 2	n.	Recycling previously implemented - additional recycling does not appear to be feasible due to permitting requirements
X 1	☐ 2	o.	Other (SPECIFY COMMENTS IN BOX BELOW)

Comments: D + E Manufacturing operations ceased May 13, 1994.

854110067

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.
Waste - unused solutions.

B. EPA hazardous waste code Page 19.
D003 P106
P104 D001

C. State hazardous waste code Page 19.
NA

D. SIC code Page 19.	E. Origin code Page 19	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA - radioactive mixed Page 20.
3965	1 System Type M	A 57	1	B 119	2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.	B. Quantity generated in 1995 Page 21.	C. UOM Page 21.	Density	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
0.0	51.0	1	NA ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995	On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995
M		M	

Sec. III

A. Was any of this waste shipped off-site in 1995 Instruction page 22. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
Site 1	NJD 991 291 105	M 141	8	51.0
Site 2		M		

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? Instruction page 24. ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 25.	D. Quantity recycled in 1995 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1995 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:
B119: Isocyanate & Cyanide liquid solutions

854110068

NTA 2103979 8-14-95

11p
15p
25p

51p

854110069

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: *Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.*

Sec. I

A. Waste description - Instruction page 18.
Solvent

B. EPA hazardous waste code Page 19.
U228

C. State hazardous waste code Page 19.
NA

D. SIC code Page 19.	E. Origin code Page 19	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20	I. RCRA - radioactive mixed Page 20.
3965	1 System Type M	A 57	1	B 202	2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.	B. Quantity generated in 1995 Page 21.	C. UOM Page 21.	Density	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
0.0	201.0	1	NA ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995	On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995
M		M	

Sec.III

A. Was any of this waste shipped off-site in 1995 Instruction page 22. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
Site 1	NJD 991 291 105	M 141	B	201.0
Site 2		M		

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? Instruction page 24. ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 25.	D. Quantity recycled in 1995 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1995 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

854110070

NJA 2103979 8-14-95 201 pounds

854110071

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.
Naphtha degreaser

B. EPA hazardous waste code Page 19.
D001

C. State hazardous waste code Page 19.
NA

D. SIC code Page 19.	E. Origin code Page 19	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA - radioactive mixed Page 20.
3965	1 System Type M	A 57	1	B 203	2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.	B. Quantity generated in 1995 Page 21.	C. UOM Page 21.	Density	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
1963.0	721.0	1	NA ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995	On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995
M	.	M	.

Sec. III

A. Was any of this waste shipped off-site in 1995 Instruction page 22. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
Site 1	NJD 991 291 105	M 141	B	721.0
Site 2		M		.

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? Instruction page 24. ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 25.	D. Quantity recycled in 1995 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1995 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No	.	.	.

Comments:

854110072

NTA 2103979 8-14-15 721 pounds

854110073

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Grady Products, Inc.

EPA ID NO: NJD 001 340 876

FORM GM

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: *Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.*

Sec. I

A. Waste description - Instruction page 18.
Waste Corrosive Liquid - Water Treatment

B. EPA hazardous waste code Page 19.
D002

C. State hazardous waste code Page 19.
NA

D. SIC code Page 19.	E. Origin code Page 19	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA - radioactive mixed Page 20.
3965	1 System Type [M]	[A] 57	1	[B] 709	2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.	B. Quantity generated in 1995 Page 21.	C. UOM Page 21.	Density	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
6747.0	1568.0	1	NA ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995	On-site process system type Page 22.	Quantity treated, disposed, or recycled on site in 1995
[M]		[M]	

Sec. III

A. Was any of this waste shipped off-site in 1995 Instruction page 22.
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
Site 1	NJD 991 291 105	[M] 141	B	1568.0
Site 2		[M]		

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? Instruction page 24.
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 25.	D. Quantity recycled in 1995 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1995 source reduction quantity Page 26.
[W] [W] [W] [W]	☐ 1 Yes ☐ 2 No			

Comments:

854110074

NJA 2022705	2-7-95	110 gallons 110 gallons } x 8.47	932
NJA 2103979	8-14-95	477 pounds	
NJA 2103965	8-14-95	159 pounds	
			1568

854110075

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.
Waste formaldehyde solution.

B. EPA hazardous waste code Page 19.
U122

C. State hazardous waste code Page 19.
NA

D. SIC code Page 19.	E. Origin code Page 19 / System Type	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA - radioactive mixed Page 20.
3965	1 / M	A 57	1	B 119	2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.	B. Quantity generated in 1995 Page 21.	C. UOM Page 21. / Density	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
0.	60.0	5 / 8.47 ☒ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type Page 22. M

Quantity treated, disposed, or recycled on site in 1995

ON-SITE PROCESS SYSTEM 2

On-site process system type Page 22. M

Quantity treated, disposed, or recycled on site in 1995

Sec. III

A. Was any of this waste shipped off-site in 1995 Instruction page 22. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
Site 1	NJD 991 291 105	M 141	8	60.0
Site 2		M		

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? Instruction page 24. ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 25.	D. Quantity recycled in 1995 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1995 source reduction quantity Page 26.
W W / W W	☐ 1 Yes ☐ 2 No			

Comments:
B119: Waste formaldehyde solution.

854110076

NTA 2022705 2-7-95 60 gallons
508 pounds

854110077

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goody Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.
Lubricating oil

B. EPA hazardous waste code Page 19.
NA D008

C. State hazardous waste code Page 19.
X726

D. SIC code Page 19.	E. Origin code Page 19	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20.	I. RCRA - radioactive mixed Page 20.
3965	1 System Type M	A 57	1	B 206	2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.	B. Quantity generated in 1995 Page 21.	C. UOM Page 21.	Density	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
0.	215.0	5	8.34	☐ 1 Yes (CONTINUE TO SYSTEM 1)
			X 1 lbs/gal ☐ 2 sg	X 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type Page 22. M

Quantity treated, disposed, or recycled on site in 1995

ON-SITE PROCESS SYSTEM 2

On-site process system type Page 22. M

Quantity treated, disposed, or recycled on site in 1995

Sec.III

A. Was any of this waste shipped off-site in 1995 Instruction page 22. X 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
Site 1	NJD 991 291 105	M 141	B	215.0
Site 2	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
		M		

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? Instruction page 24. ☐ 1 Yes (CONTINUE TO BOX B) X 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 25.	D. Quantity recycled in 1995 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1995 source reduction quantity Page 26.
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

854110078

NJA 2022705	2-7-95	20 gallons
NJA 2182127	8-14-95	195 gallons
		215 "
		× 8.34
		1793 pounds

854110079

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Goodly Products, Inc.

EPA ID NO: NJD 001 340 876

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

1995 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.
Waste Oxidizing Substance

B. EPA hazardous waste code Page 19.
D001 D007
D011

C. State hazardous waste code Page 19.
NA

D. SIC code Page 19.	E. Origin code 1 Page 19 System Type	F. Source code Page 20.	G. Point of measurement Page 20.	H. Form code Page 20	I. RCRA - radioactive mixed Page 20.
3965		57	1	316	2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.	B. Quantity generated in 1995 Page 21.	C. UOM Page 21.	Density	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
0.	313.0	1	NA ☐ 1 lbs/gal ☐ 2 sg	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type Page 22.

Quantity treated, disposed, or recycled on site in 1995

ON-SITE PROCESS SYSTEM 2

On-site process system type Page 22.

Quantity treated, disposed, or recycled on site in 1995

Sec. III

A. Was any of this waste shipped off-site in 1995 Instruction page 22. ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC IV)

	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23.	D. Off-site availability code Page 23.	E. Total quantity shipped in 1995 Page 23.
Site 1	NJD 991 291 105	H	8	313.0
Site 2				

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? Instruction page 24. ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.	C. Other effects Page 25.	D. Quantity recycled in 1995 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1995 source reduction quantity Page 26.
	☐ 1 Yes ☐ 2 No			

Comments:

854110080

NJA	2022705	2-7-95	200 pounds
NJA	2103979	8-14-95	113 pounds
			313

854110081

THIS MAP CAN BE FOUND IN THE SITE FILE LOCATED AT: U.S. EPA SUPERFUND RECORDS CENTER, 290 BROADWAY, 18TH FLOOR, NY,NY 10007

BASE SITE MAP
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

WOODWARD-CLYDE CONSULTANTS

CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS
WAYNE, NEW JERSEY

DR.BY	MG	SCALE	AS SHOWN	PROJ.	92C4246
CK'D.BY		DATE	DEC 11 1992	FIG.NO.	

854110082

Results of Field Investigation and Review of Remedial Options

Exhibit 7b.

Goody Products, Inc.
969 Kearny Turnpike
Kearny, New Jersey

Prepared For:

Goody Products, Inc.
969 Newark Turnpike
Kearny, New Jersey 07032

Prepared By:

Woodward-Clyde Consultants
201 Willowbrook Blvd.
Wayne, New Jersey 07470

June, 1993

92C4246

Volume 1 of 2

854110083

THIS MAP CAN BE FOUND IN THE SITE FILE LOCATED AT: U.S. EPA SUPERFUND RECORDS CENTER, 290 BROADWAY, 18TH FLOOR, NY,NY 10007

SEDIMENT SAMPLING LOCATIONS AND RESULTS
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

WOODWARD-CLYDE CONSULTANTS

CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS
WAYNE, NEW JERSEY

DR.BY	MG	SCALE	AS SHOWN	PROJ.	92C4246
CK'D.BY		DATE	DEC 11 1992	FIG.NO.	3-8

854110084

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1.0
INTRODUCTION

1.1 BACKGROUND

Woodward-Clyde Consultants (WCC) was retained by Goody Products, Inc. (Goody) to evaluate the need for and to investigate and develop remedial alternatives, if necessary, for a potential corrective action at Goody's Kearny, New Jersey facility.

This document describes this investigation and its results, which was used to evaluate and estimate costs for the remedial options. A discussion of the feasibility of these alternatives is also presented in this report.

The scope of work for this project included:

- a review of existing Goody files;
- a review of regulatory files and other background information;
- groundwater sampling from existing monitoring wells;
- groundwater recovery tests;
- groundwater sampling from HydroPunch borings;
- installation of piezometers in the upper water bearing zone;
- water level monitoring of the groundwater and stream;
- soil sampling in areas of elevated metal concentrations;
- sediment sampling of Dead Horse Creek; and
- preparation of a Health and Safety Plan.

Section 1 provides background about the project including the site history and operations, neighboring land use, previous site investigations, and the scope of work for this investigation. Section 2 discusses the methods and procedures for the field investigations, including well sampling, slug testing, HydroPunch sampling, water and stream level monitoring, and soil and sediment sampling. Section 3 discusses the results of these investigations. Section 4 discusses the feasibility and costs of the remedial options of soils. Section 5 discusses the feasibility and costs of the remedial options of

groundwater. Section 6 presents conclusions and recommendations. Section 7 outlines the limitations of these investigations, conclusions, and recommendations.

1.1.1 Site History and Operations

The site is located at 969 Newark Turnpike, immediately west of the intersection of Newark and Belleville Turnpikes in Kearny, New Jersey. The site is in a predominantly industrial area within the Meadowlands of Hudson County. Figure 1-1 shows the site location. Figure 1-2 shows the site plan.

The site is bordered by the Newark Turnpike to the south and east, the Belleville Turnpike to the east and northeast, a railroad right of way to the north, and Dead Horse Creek to the west. The site was undeveloped before 1966. The history of the site and neighboring properties is discussed in more detail later. Most of the surrounding land has been reclaimed from wetlands by importing manmade fill which includes demolition debris. Much of the surrounding property is owned by the same owner as this site and a review of the records of surrounding sites indicates very similar demolition debris over much of the area.

1.1.2 External File Search

An external search was completed to identify companies in the Kearny area that are undergoing environmental investigations or have discharge permit applications. Searches were obtained from Environmental Risk Information and Imaging Services, Vista Search, Environmental Data Resources Toxicheck and NJDEPE computer radius of 100,000 gpd water withdrawal points. The external searches provided a list of company names, addresses, and limited information of operations on the site. Information received with the above search provided a starting point for investigating background contaminant concentrations in the soil and groundwater in the Goody site area and helped define the levels and types of cleanup that are applicable and appropriate to sites located in the Meadowlands. Table 1-1 lists the companies within one mile that were listed in the searches. A summary of a one mile radius well search is provided in Table 1-2.

TABLE 1 - 1

ONE MILE RADIUS FILE SEARCH SUMMARY
GOODY PRODUCTS, INC.
KEARNY ,NJ

Site Name	Address	Municipality	County
Acme Tool and Machine	580 Davis Ave	Kearny	Hudson
Alpha Metals	590 Belleville Trpk	Kearny	Hudson
American Modern Metals	25 Bellgrove Dr.	Kearny	Hudson
Amtrack	Kearny	Kearny	Hudson
Anchak Service Station Inc.	815 Harrison Ave	Kearny	Hudson
Arlington Diner	941 Passaic Ave	Kearny	Hudson
Army Reserve Site	Hackensack Ave	Kearny	Hudson
B & L Oil Company	1215 Harrison Ave	Kearny	Hudson
Barczewski St. Drum Dump	Barczewski St.	Kearny	Hudson
BASF Corporation	50 Central Ave	Kearny	Hudson
Belleville Pike Site	Belleville Trpk	Kearny	Hudson
Browning - Ferris Industries	Belleville Trpk	Kearny	Hudson
Conrail - Meadows Yard	Pennsylvania Ave	Kearny	Hudson
Cylinder Maintenance Corp	590 Belleville Trpk	Kearny	Hudson
Capital City Products	Foot of Sanford Ave	Kearny	Hudson
Chester Jackson Tank Lines	470 Stover Ave	Kearny	Hudson
Cloroben Chemical Corporation	1035 Belleville Trpk	Kearny	Hudson
Diamond Alkali	80 Lister Ave	Newark	Essex
Diamond Heat Oil Refinery	1401 Harrison Trpk	Kearny	Hudson
Diamond Shamrock Corporation	Belleville Trpk	Kearny	Hudson
Dompel Textile	590 Belleville Trpk	Kearny	Hudson
Dower Finishing and Research	53 - 61 2nd Ave	Kearny	Hudson
Franklin Plastics	113 Passiac Ave	Kearny	Hudson
G & S Motor Equipment, Inc.	1800 Harrison Ave	Kearny	Hudson
HMDC Kearny 1A SLF	Block 33 Lot 286	Kearny	Hudson
HMDC 1C	Belleville Trpk	Kearny	Hudson
Hudson County Ash Residue SLF	Jersey City & Newark Trpk	Kearny	Hudson
Interstate Metals Separating	241 Dukes St	Kearny	Hudson
Janatex Road Site	993 Belleville Trpk	Kearny	Hudson
Kearny - 3rd & Adams	3rd St	Kearny	Hudson
Kearny Drum Disposal Area	Belleville Trpk	Kearny	Hudson
Kearny Drum Dump #1	Belleville Trpk	Kearny	Hudson
Kearny Drum Dump #2	Harrison Ave	Kearny	Hudson
Kearny Drum Dump #3	Belleville Trpk	Kearny	Hudson
Kearny Drum Dump #4	Belleville Trpk	Kearny	Hudson
Kearny Drum Dump #5	Belleville Trpk	Kearny	Hudson
Kearny Pallet Repair Co	936 Harrison Ave	Kearny	Hudson
Kearny Power & Light	Hackensack Ave	Kearny	Hudson
Kearny Smelting & Refining Co.	936 Harrison Ave	Kearny	Hudson
Keegan Landfill	Bergen Ave	Kearny	Hudson
Koppers Coke	Fish house Rd.	Kearny	Hudson
L&J Drums Co.	1810 Harrison Ave	Kearny	Hudson
Lawter Chemical, Inc.	24 Jacobus Ave	Kearny	Hudson
Maxus Corporation, Co.	996 Belleville Ave	Kearny	Hudson

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TABLE 1 - 1

ONE MILE RADIUS FILE SEARCH SUMMARY
GOODY PRODUCTS, INC.
KEARNY ,NJ

Maxus Corporation, Co.	Newark Trpk	Kearny	Hudson
Maxus Corporation, Co.	1010 Belleville Trpk	Kearny	Hudson
Modern Transportation Co.	75 Jacobus Ave	Kearny	Hudson
MSLA 1-A Landfill	Belleville Trpk	Kearny	Hudson
MSLA 1-C Landfill	600 Belleville Trpk	Kearny	Hudson
MSLA 1-D Landfill	1500 Harrison Ave	Kearny	Hudson
New Jersey Transit - Meadows Yard	Belleville & Newark Trpks	Kearny	Hudson
Pacquet Corporation	590 Belleville Trpk	Kearny	Hudson
Pantasote Inc. - Wall Covering Div.	85 Lincoln Highway	Kearny	Hudson
PSE&G - Kearny Generation Station	Foot of Hackensack Ave	Kearny	Hudson
S & W Waste	115 Jacobus Ave	Kearny	Hudson
S & W Waste Inc.	53 Pennsylvania Ave	Kearny	Hudson
Second St & Central Ave Site	Second St	Kearny	Hudson
St Johnsbury Trucking	O'Brien St	Kearny	Hudson
Standard Chloride Chem. Co., Inc.	1015 - 1035 Belleville Trpk	Kearny	Hudson
Syncon Resins	77 Jacobus Ave	Kearny	Hudson
TP Industrial, Inc.	49 Central St.	Kearny	Hudson
Tress Chemical Co.	Harrison Ave	Kearny	Hudson
Turco Industrial Park	590 Belleville Trpk	Kearny	Hudson
Veckridge Chemical Co.	60 Central Ave	Kearny	Hudson
Warner Manufacturing	100 Third Ave	Kearny	Hudson
Western Electric Kearny	100 Central Ave	Kearny	Hudson

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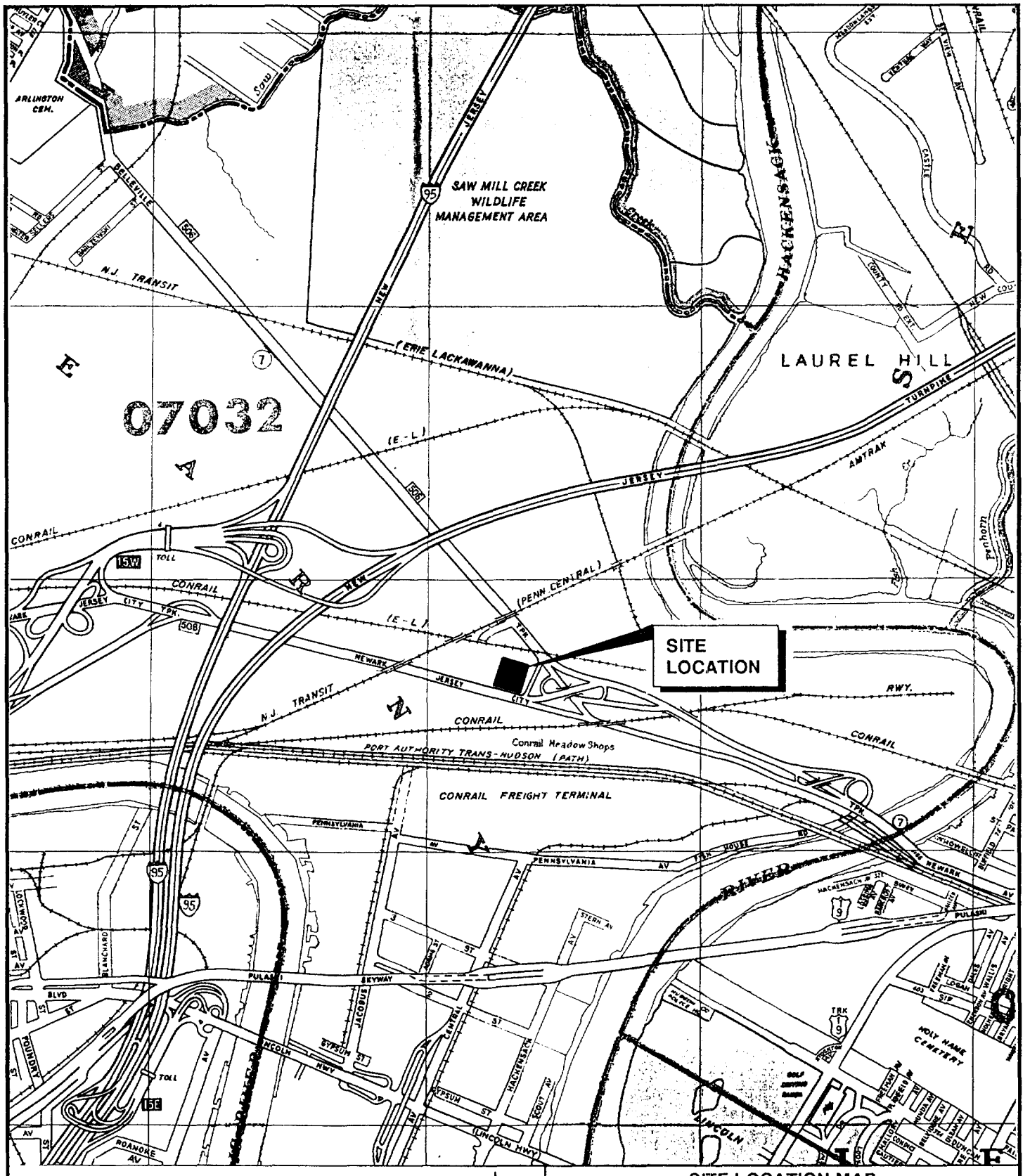

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SCALE

MAP SOURCE:
BASE MAP OBTAINED FROM HAGSTROM MAP COMPANY, INC., TITLED 'HUDSON COUNTY, NEW JERSEY, DATED 1990.

SITE LOCATION MAP
GOODY PRODUCTS
KEARNY, NEW JERSEY

WOODWARD-CLYDE CONSULTANTS
CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS
WAYNE, NEW JERSEY

DR. BY:	BAS	SCALE:	AS SHOWN	PROJ. NO.:	92C4246
CK'D. BY:	ES	DATE:	19 MAR 1993	FIG. NO:	1 – 1

TABLE 1 -2

100,000 GPD WATER WITHDRAWAL POINTS WITHIN ONE MILE
GOODY PRODUCTS, INC.
KEARNY, NJ

Site Name	Address	Municipality	County	Distance from Goody (miles)
Standard Chlorine Chemical Company Inc.	1015 - 1035 Belleville Trpk	Kearny	Hudson	0.6
Diamond Shamrock Corporation	Belleville Trpk	Kearny	Hudson	0.3
Monsanto Company	Pennsylvania Ave.	Kearny	Hudson	0.8
G & S Motor Equipment	1800 Harrison Ave.	Kearny	Hudson	0.5
Modern Transportation	75 Jacobus Ave.	Kearny	Hudson	0.9
Syncon Resins	77 Jacobus Ave.	Kearny	Hudson	0.9
S & W Waste Incorporated	53 Pennsylvania	Kearny	Hudson	0.7
Kearny Drum Disposal Area	Belleville Trpk	Kearny	Hudson	0.7
Belleville Pike Site	Belleville Trpk	Kearny	Hudson	1
Kearny Drum Dump #1	Belleville Trpk	Kearny	Hudson	1
Kearny Drum Dump #3	Belleville Trpk	Kearny	Hudson	0.5
Kearny Drum Dump #4	Belleville Trpk	Kearny	Hudson	1
Kearny Drum Dump #5	Harrison Ave.	Kearny	Hudson	0.6
Kearny - 3rd & Adams	3 rd St.	Kearny	Hudson	0.8
Kearny Power and Light	Hackensack Ave.	Kearny	Hudson	0.8
Subox Carboline	40 Burlews Ct.	Hackensack	Bergen	0.7
Janatex Enterance Road Site	993 Belleville Trpk	Kearny	Hudson	0.5
Second Street & Central Avenue Site	2 nd St. & Central Ave.	Kearny	Hudson	0.9
MSLA 1 - A Landfill	Belleville Trpk	Kearny	Hudson	0.2
S & W Waste Incorporated	115 Jacobus Ave.	Kearny	Hudson	0.8
L & J Drums Company	1810 Harrison Ave.	Kearny	Hudson	0.5
Hudson County Chromate 42	90 - 94 & 98 - 102 Jacobus Ave.	Kearny	Hudson	0.8
Hudson County Chromate 47	1010 Belleville Trpk	Jersey City	Hudson	0.1
Hudson County Chromate 48	1000 Belleville Trpk	Kearny	Hudson	0.1
Hudson County Chromate 49	100 Hackensack Ave.	Kearny	Hudson	0.8
Hudson County Chromate 50	933 Belleville Trpk	Kearny	Hudson	0.3
Hudson County Chromate 51	Belleville Trpk	Kearny	Hudson	0.5
Hudson County Chromate 56	Belleville Trpk & Old Newark Rd	Kearny	Hudson	0.5
Hudson County Chromate 58	996 Belleville Trpk	Kearny	Hudson	0.2
Hudson County Chromate 59	Newark Trpk	Kearny	Hudson	0.9
Hudson County Chromate 103	Belleville Trpk	Jersey City	Hudson	0.4
Hudson County Chromate 109	Foot of Pennsylvania Ave	Kearny	Hudson	0.7
Hudson County Chromate 126	96 Hackensack Ave.	Kearny	Hudson	1
Hudson County Chromate 145	2 Fishouse Rd	Kearny	Hudson	0.3
Hudson County Chromate 167	Central Ave & 3rd St	Kearny	Hudson	0.8
Hudson County Chromate 168	80 Park Place	Kearny	Hudson	0.8
Hudson County Chromate 169	Central Ave	Kearny	Hudson	0.8
Hudson County Chromate 171	Central Ave	Kearny	Hudson	0.6
Route 508 Expansion	Rte 508 & NJ Trpk Exit 15W	Kearny	Hudson	0.4
Gardner Asphalt Corporation	80 Jacobus Ave.	Kearny	Hudson	0.9

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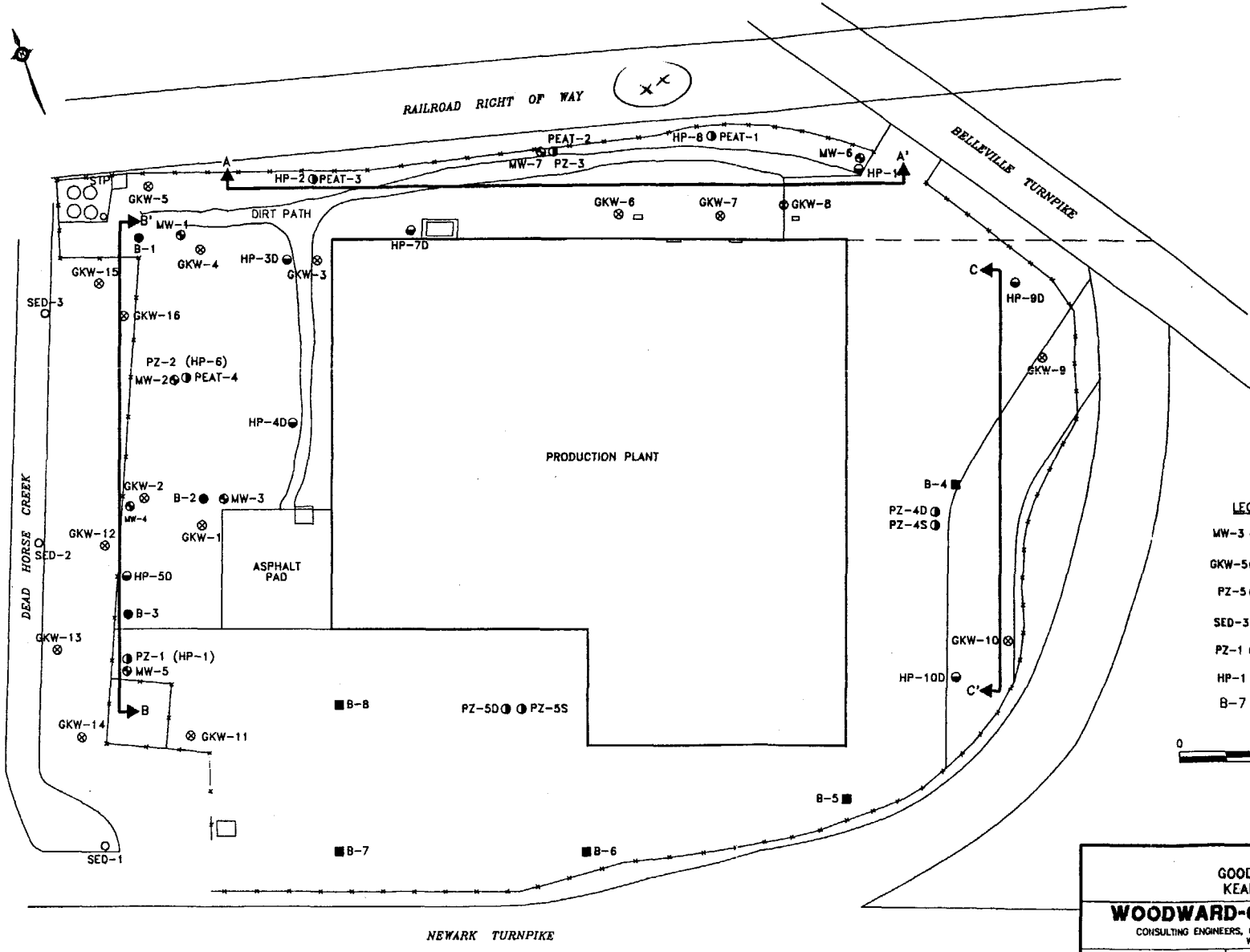

SITE MAP
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

WOODWARD-CLYDE CONSULTANTS

CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS
WAYNE, NEW JERSEY

DR.BY	MG	SCALE	AS SHOWN	PROJ.	92C4246
CK'D.BY	EJS	DATE	FEB 5 1993	FIG.NO.	1-2

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1.1.3 NJDEPE File Review

Based on the results of the external file search, a records search with state and local agencies was conducted to help define the levels and types of cleanup appropriate to sites in the Meadowlands and to assess other possible contributors to on-site contaminants.

Sites on the list (Table 1-1) which 1) were within one mile of the Goody site and 2) may have had similar industrial activities were compiled in a second list which was submitted to the NJDEPE ECRA Records Custodian.

Two sites were listed with ECRA - BASF and Alpha Metals. WCC obtained an appointment to review the files of both sites. The BASF site files provided little new or useful information because the contaminants and geologic conditions were not similar to those at the Goody site. The Alpha Metals site files provided useful information about background levels and cleanup standards in the area. Alpha Metals has similar geological conditions (fill material with brick and concrete), similar ownership/tenant relationship, and similar soil contamination above NJDEPE cleanup standards (volatile organics, base neutrals, heavy metals, and total petroleum hydrocarbons). Alpha Metals had proposed to clean up the soils for volatile organics but had proposed no further action for heavy metals and base-neutrals (based on the contention that this contamination was a result of the fill used on-site and not the activities of Alpha Metals). To support this proposal, they urged that 1) the fill had been from an unknown source in 1965, 2) the base neutrals and heavy metals were randomly distributed across the site, 3) background samples had elevated contaminant concentrations, and 4) the majority of metals detected had not been used in Alpha Metal's operations. Alpha Metals argues that the contamination was related to the fill and therefore, required no further actions. The NJDEPE did not accept this proposal because the levels of heavy metal and base neutral contamination detected were above the proposed NJDEPE cleanup standards for non-residential soils. The NJDEPE did not believe the background concentrations truly represented actual background conditions and would require excavation of the soils to remediate the site to levels below the appropriate NJDEPE proposed cleanup standards (residential or non-residential depending on future land use restrictions). The NJDEPE generally will allow cleanup

to only non-residential standards if property access and deed restrictions can be guaranteed. In addition, some latitude to levels higher than non-residential can be granted on a case-to-case basis.

Residential surface soil standards are, in general, meant to be protective of small children who may ingest soil. Non-residential standards are meant to be protective of construction workers outside who may come in contact with soils during excavations or other intrusive activities.

Additional information was obtained from the Kearny Tax Assessors Department and Kearny Health Department to assess other possible contributors to on-site contamination. The Tax Assessors Department provided WCC with the names of companies located near the Goody site. The Health Department provided information about environmental investigations currently underway at three facilities in the immediate area around the Goody site: Koppers Coke Inc., Diamond Shamrock Corporation, and the Standard Chlorine Chemical Company. The three sites are located northeast of the Goody site on Belleville Turnpike. Detailed site-specific information about operations and contaminations for these three sites, including the possibility of contaminant contributions to the Goody site, was collected from the NJDEPE and the Vista Environmental Information Hazardous Waste Report.

Koppers Coke manufactured coke, coal tar, coal gas, sulfuric acid, cyanide compounds and light oils. The facility ceased operations in the early 1970s and by 1979 all structures (except for one tank and two buildings) had been demolished. In 1980, the NJDEPE conducted a site inspection and found soil samples with elevated levels of petroleum hydrocarbons and volatile organics. By 1990, remediation of the central portion of the site was underway using a cap over the site and a groundwater monitoring program. Off-site areas including the Hackensack River are still under investigation. The Hudson County Improvement Authority has entered into an agreement to purchase the property and plans to locate a resource recovery facility and residue ash landfill on the site. However, Koppers Coke remains responsible for the overall site remediation.

Diamond Shamrock Corporation was a chromate manufacturing business operating between 1948 and 1976. The plant was demolished in 1978. It has been estimated that

390,000 tons of chromate residue was landfilled on the property. Another 380,000 tons were transported off-site and used as fill material in what is now commercial, industrial and residential areas of Hudson County. In 1990, Occidental Chemical Corporation (the successor to Diamond Shamrock) signed an Administrative Consent Order to conduct a detailed investigation and remediate the former Diamond Shamrock site as well as all the other sites identified as having received the site's chromate residue as fill. Many of these properties are adjacent to the Goody site. A Draft Remedial Investigation Work Plan has been submitted to the NJDEPE to investigate of chromium contamination of the groundwater, surface water, and soil in the vicinity of the Diamond Shamrock site.

The Standard Chlorine Chemical Company site is bounded by the Hackensack River to the east, Belleville Turnpike to the west, Diamond Shamrock to the north, and Koppers Coke to the South. Operations at the Standard Chlorine included manufacturing moth crystals and flakes from dichlorobenzene. Standard Chlorine separated dichlorobenzenes at the site from 1963 until 1982; the company also separated and stored 1, 2, 4-trichlorobenzene and processed liquid petroleum naphthalene.

Standard Chlorine is currently investigating the soil and groundwater for various contaminants. Chromium-contaminated fill materials were reported on-site and are thought by NJDEPE to exist throughout Hudson County and to have originated from Diamond Shamrock (MAXUS) who would be responsible for the cleanup. Volatile and semi-volatile compounds were found in groundwater beneath the site and in some soil samples. Groundwater samples collected from property adjacent to Standard Chlorine's boundary contained naphthalene, dichlorobenzenes, and trichlorobenzenes; these contaminants were suspected to originate from Standard Chlorine because they had been processed at the site. In addition, dioxins were found in a waste lagoon adjacent to the former dichlorobenzene process building. An Interim Remedial Measure for the containment of chromium and other contaminants has been completed. It included paving the site, fencing the property, installing signs, and grading the property to control storm water overflow of lagoons. Investigations continue at the site and no conclusions or additional reports are available as of this date.

1.1.4 Review of Aerial Photographs

Aerial photographs of the area surrounding the Goody Products site were obtained from National Aerial Resources for the years 1940, 1951, 1961, 1966, 1969, 1980 and 1986. The following presents a review of the photographs.

1940 - The earliest photograph showed that the site was an undeveloped marsh surrounded by a few industrial sites and undeveloped areas. The Conrail Freight Terminal and Port Authority Railroad tracks, which are still present, were under construction to the south of the site. Koppers Coke and Diamond Shamrock properties contain several industrial structures to the northeast of the Goody site.

1951 - The photo showed that the site remained undeveloped and had not changed since 1940. The construction of the Conrail Freight Terminal and the Port Authority railroad track had been completed. The sites to the northeast remained unchanged except for two small structures near the Hackensack River on the Koppers Coke property. The New Jersey Turnpike was under construction to the north and the other surrounding areas remained undeveloped.

1961 - The photograph showed that the site remained undeveloped. New landfilling was beginning at the Conrail Freight Terminal and Port Authority track to the south. No changes are evident at the industrial sites to the northeast except for construction activity to the north of Diamond Shamrock. The New Jersey Turnpike had been completed and the other areas remained unchanged.

1966 - Photographs show some landfilling activities on the Goody site but no construction is evident. The landfilled area to the south of the site at Conrail had been completed but no structures appear. The industrial sites to the northeast remain unchanged. The construction activity to the north of Diamond Shamrock was completed with one large and several small industrial structures. The other adjacent areas were beginning to change - two structures were built to the northwest of the site and landfilling activity is evident to the west.

1969 - The photos show a number of changes throughout the area. The Goody Products building had been completed with one access road passing through the eastern area of the site. Directly to the west, a large industrial structure is evident. The landfilled area to the south on the Conrail property was undergoing construction. A third structure had been added to the two existing structures first seen in the 1966 photo to the northwest of the site. The industrial sites to the northeast remained unchanged.

1980 - The area remained relatively unchanged except in a few places. The construction on the Conrail property was completed with a large structure. To the east of the Goody site, new access ramps had been constructed for Belleville Turnpike and Newark Turnpike. All structures on the Diamond Shamrock property had been demolished and the building north of Diamond Shamrock had been expanded.

1986 - The photos showed few changes to the structures on the site and to the area surrounding the site.

1.2 PREVIOUS INVESTIGATIONS

An environmental site investigation was conducted at the Goody Products facility by Converse Environmental East (Converse) in May, June, and September, 1988, in response to a letter from the NJDEPE dated November 24, 1987. Phase I included soil sampling from 54 test pits (Appendix A, Figure A-1) excavated mainly in the western portion of the site to characterize the extent of contamination. Phase II, which was conducted in September 1988, included additional soil sampling to further delineate the horizontal and vertical extent of contamination identified in Phase I, as well as the installation and sampling of seven overburden monitoring wells, finished below the peat layer (in a sand unit).

1.2.1 Converse Soil Sample Results

During Phase I soil sampling, two areas of concern were sampled: the Waste Water Treatment Plant (WWTP) Discharge Pit at the northwest corner of the site and the west yard. The Phase II sampling program was focused on three areas of the site: the north yard, the yard area between the west fence and Dead Horse Creek, and portions of the

parking lot south of the hazardous waste storage area (HWSA) on the west side of the building. Background soil samples also were collected in the northeast and southeast portions of the property.

The Phase II investigation included seven shallow soil borings completed to the water table (4.0 to 4.5 feet) in the parking lot and at two background locations, 24 additional test pits (Appendix A, Figure A-1), and soil sampling of three of the well borings.

The Phase I soil samples were analyzed for aluminum, arsenic, cadmium, chromium, copper, lead, nickel, silver, zinc and total petroleum hydrocarbons (TPHC) because these parameters are on Goody's WWTP NJPDES permit, and quench oil had been stored at the HWSA. The Phase II analyte list was reduced based on the Phase I results, and included cadmium, chromium, lead, nickel, zinc, and TPHC. The soil sample results (Tables 1-3 and 1-4) have been compared to the current NJDEPE proposed cleanup standards for residential surface soils. Tables 1-5 and 1-6 compare the same soil sample results to the current NJDEPE proposed non-residential cleanup standards. The contaminants detected at levels above cleanup standards are cadmium, lead, nickel, and TPHC. Concentrations of chromium also were detected; however, the levels could not be compared to a cleanup standard because none is available. (The levels detected range from 4.7 to 12,100 ppm in the surface soils.) The highest levels of metals occurred in samples collected near the WWTP Discharge Pit, the yard area northwest of the HWSA, and adjacent to the north side of the building. These areas were previously delineated as A, B, and C (respectively) by Converse in their report dated April 14, 1989. Only the surface soils (0 to 2 feet) were compared to the relevant NJDEPE metals cleanup standards, because no standards have been established for subsurface (greater than 2 feet in depth) soils. The metal concentrations above both the residential and non-residential cleanup standards for cadmium, lead, nickel, zinc, copper, and TPHC are shown in Appendix A. Total concentrations of chromium above 100 ppm are also shown in Appendix A; a standard of 100 ppm was selected because this standard was previously used by NJDEPE before the proposed cleanup standards were developed.

TABLE 1-3

CONVERSE PHASE I SOIL SAMPLING RESULTS VS PROPOSED NJDEPE RESIDENTIAL STANDARDS

ALL RESULTS IN (mg/kg)

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-1 S-1	TP-1 S-2	TP-2 S-1	TP-3 S-1	TP-3 S-2	TP-4 S-1	TP-5 S-1	TP-5 S-2	TP-6 S-1	TP-6 S-2	TP-7 S-1	TP-8 S-1	TP-8 S-2
Sample Depth (ft)		0-0.5	1.3-1.8	0-0.5	0-0.5	1.3-1.8	0-0.5	0-0.5	1.4-1.9	0-0.5	1.0-1.5	0-0.5	0-0.5	1.5-2.0
Sample Date		5/31/88	6/3/88	5/31/88	5/31/88	6/3/88	5/31/88	5/31/88	6/8/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88
Parameter														
Aluminum	--	9895	7307	7984	12090	10297	10457	9296	4778	29650	5150	9122	7417	4624
Arsenic	20	<5.00	4.4	5.32	7.02	<5.00	5.98	6.77	<5.00	8.75	<5.00	5.61	6.27	<5.00
Cadmium	1	97.1	7.86	10.95	12.69	2.93	13.1	<2.50	<2.50	301.1	10.6	37.87	<2.50	2.46
Chromium	--	68.67	63.77	123.7	56.32	17.94	168.2	69.38	11.76	112.2	35.72	53.07	30.51	26.09
Copper	600	30.28	154	28.82	63.64	20.77	57.77	58.06	27.24	45.34	52.51	47.46	41.31	79.65
Lead	100	428.9	705.6	598.7	344.6	177.9	473.3	821.3	179	250.3	668.9	990.9	442.3	907.7
Nickel	250	5456	526.2	1309	2530	15.75	2919	107.5	129.8	23585	709.8	7293	39.53	114.3
Silver	40	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	0.57	<3.64	1.33	<2.50	<2.50	1.12
Zinc	1500	373.5	390	448.5	336.1	83.13	581.5	471.3	108.9	277.3	453.7	427.3	306.2	411.6
TPHC	10000	1856	217.2	214	156	24.4	157	338	96.7	3638	258.9	247	121	454.5

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-9 S-1	TP-10 S-1	TP-10 S-2	TP-11 S-1	TP-11 S-2	TP-12 S-1	TP-13 S-1	TP-13 S-2	TP-14 S-1	TP-15 S-1	TP-15 S-2	TP-16 S-1	TP-16 S-2
Sample Depth (ft)		0-0.5	0-0.5	1.4-1.9	0-0.5	0.9-1.4	0-0.5	0-0.5	0.8-1.3	0-0.5	0-0.5	0.7-1.2	0-0.5	0.9-1.4
Sample Date		5/31/88	5/31/88	6/3/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88	5/31/88	6/8/88
Parameter														
Aluminum	--	9934	6753	5981	15787	7133	7268	8594	3706	12910	12551	5219	11546	8402
Arsenic	20	8.55	<5.00	5.23	5.65	<5.00	<5.00	6.05	<5.00	6.94	<7.10	<5.00	<5.00	<5.00
Cadmium	1	4.01	37.93	3.54	29.03	19.66	21.2	<2.50	3.08	20.3	124	8.59	<2.50	160.9
Chromium	--	96.97	50.97	46.72	86.08	73.53	54.23	30.31	22.62	43.84	92.55	28.98	43.49	83.44
Copper	600	78.61	43	41.78	45.53	39.94	35.42	48.08	95.82	44.82	54.38	34.94	34.22	67.39
Lead	100	514.1	1060	852.6	628.1	651	563.8	550	1157	568.4	436.7	236.3	266.1	173.8
Nickel	250	1452	4808	99.36	4607	2437	3449	73.39	166.3	2695	13509	769.7	1389	17652
Silver	40	<2.50	<2.50	<2.50	<2.50	0.69	<2.50	<2.50	0.48	<2.50	<2.50	0.37	<2.50	0.32
Zinc	1500	527.5	492.7	409.7	569.6	942.7	786.6	552.8	913.3	1108	336.2	171.01	189.9	150.8
TPHC	10000	52	188	309	400	130.9	564	90	1707.8	1891	3142	64	107	5986.8

Notes: Shaded cells indicate exceedances of the proposed NJDEPE residential surface soil cleanup standards

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TABLE 1-3

CONVERSE PHASE I SOIL SAMPLING RESULTS VS PROPOSED NJDEPE RESIDENTIAL STANDARDS

ALL RESULTS IN (mg/kg)

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-17	TP-18	TP-18	TP-19	TP-20	TP-20	TP-21	TP-21	TP-22	TP-22	TP-23	TP-23	TP-24
		S-1	S-1	S-2	S-1	S-1	S-2	S-1	S-2	S-1	S-2	S-1	S-2	S-1
Sample Depth (ft)		0-0.5	0-0.5	1.6-2.1	0-0.5	0-0.5	1.6-2.1	0-0.5	2.7-3.2	0.0-0.5	2.6-3.1	0.0-0.5	3.3-3.8	0.0-0.5
Sample Date		5/31/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88
Parameter														
Aluminum	--	8165	11006	13094	17169	5476	6783	12918	8442	8979	9050	8926	6888	7263
Arsenic	20	<5.00	6.7	<5.00	7.93	<5.00	6.48	6.53	6.44	5.64	7.64	6.04	7.8	<5.00
Cadmium	1	<2.50	5.3	3.04	<2.50	5.73	2.89	3.55	<2.50	2.17	2.72	2.85	3.46	2.6
Chromium	--	57.64	243.1	26.54	58.38	224.4	30.2	77.86	211.3	35.35	34.06	146.1	33.29	78.68
Copper	600	43.35	49.91	29.53	37.04	39.37	50.65	45.79	40.69	35.44	37.5	55.09	84.12	70.04
Lead	100	282.5	625.8	188.2	374.9	409.2	1131	212	358	120.2	325.7	479.5	353.15	314.6
Nickel	250	308.7	1069	22.45	983	576.9	30.07	23.56	19.11	17.05	15.86	22.5	24.17	50.49
Silver	40	<2.50	<2.50	0.39	<2.50	<2.50	0.54	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Zinc	1500	211.9	1691	110.9	286.6	410.8	563.3	357.4	152.7	95.22	132.7	245.4	189.1	292.3
TPHC	10000	399	411	158	131	215	387.4	37.2	49.3	175.4	70.9	200	456.7	170.1

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-24	TP-25	TP-25	TP-26	TP-26	TP-27	TP-27	TP-28	TP-28	TP-29	TP-29	TP-30	TP-30
		S-2	S-1	S-2	S-1	S-2	S-1	S-2	S-1	S-2	S-1	S-2	S-1	S-2
Sample Depth (ft)		3.5-4.0	0.0-0.5	3.4-3.9	0.0-0.5	2.0-2.5	0-0.5	3.5-4.0	0.0-0.5	1.4-1.9	0.0-0.5	1.9-2.4	0.0-0.5	1.7-2.3
Sample Date		6/6/88	6/3/88	6/3/88	6/6/88	6/6/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88
Parameter														
Aluminum	--	8872	12559	9506	7855	6461	15805	6124	7539	5488	8331	6425	5968	4574
Arsenic	20	12.15	6.69	<5.00	<5.00	6.01	6.94	<5.00	<5.00	<5.00	6.04	<5.00	<5.00	<5.00
Cadmium	1	2.82	3.04	2.52	<2.50	<2.50	5.27	<2.50	3.81	<2.50	<2.50	<2.50	<2.50	<2.50
Chromium	--	40.15	44.79	19.35	39.15	49.78	102.1	8.78	38.12	11.82	116.2	21.47	57.39	9.77
Copper	600	53.28	45.15	36.85	91.26	73.21	757.1	16.89	61.38	16.95	65.93	28.27	44.97	42.2
Lead	100	405.6	515.3	620.4	580.2	462.7	188.2	70.12	1079	90.35	424.7	83.46	561.9	98.96
Nickel	250	24.79	25.33	18.14	34.03	16.74	37.92	10.22	478.09	125.4	29.02	12.89	17.48	6.92
Silver	40	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Zinc	1500	349.4	204	165.1	397.4	339.4	188.2	54.22	309.8	116.5	255.6	74.98	167	99.46
TPHC	10000	212.8	62.7	249.4	38.3	286.3	73.9	145.1	257.1	49.2	757.6	23.3	129.5	242

Notes: Shaded cells indicate exceedances of the proposed NJDEPE residential surface soil cleanup standards

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TABLE 1-3

CONVERSE PHASE I SOIL SAMPLING RESULTS VS PROPOSED NJDEPE RESIDENTIAL STANDARDS

ALL RESULTS IN (mg/kg)

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-31 S-1	TP-31 S-2	TP-32 S-1	TP-32 S-2	TP-33 S-1	TP-33 S-2	TP-34 S-1	TP-34 S-2	TP-35 S-1	TP-35 S-2	TP-36 S-1	TP-36 S-2	TP-37 S-1
Sample Depth (ft)		0.0-0.5	2.4-2.9	0.0-0.5	3.1-3.6	0.0-0.5	2.3-2.8	0.0-0.5	2.3-2.8	0.0-0.5	1.9-2.4	0.0-0.5	1.7-2.2	0.0-0.5
Sample Date		6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88
Parameter														
Aluminum	--	9205	5957	4228	5631	5636	5701	5921	6100	3611	7857	891.5	4065	7802
Arsenic	20	<5.00	<5.00	<5.00	5.76	<5.00	5.19	5.29	6.47	<5.00	<5.00	<7.26	8.82	<5.00
Cadmium	1	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	163.4	3.16	23.4
Chromium	--	23.18	9.08	45.79	127.9	22.89	13.17	67.75	11.21	28.66	11.15	170	13.55	81.37
Copper	600	1121	24.28	61.84	66.17	44.77	46.5	42.33	69.34	98.7	22.86	64.4	275.9	60.05
Lead	100	70.89	90.22	501.1	243.8	161.7	163.8	180.5	281.18	61.2	70.53	184.3	590.6	196.2
Nickel	250	26	11.08	21.11	28.5	15.48	10.91	373.1	22.86	67.06	12.05	34193	103.8	3668
Silver	40	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<3.63	<2.50	<2.50
Zinc	1500	148.6	72.54	244.8	124.7	105.1	141.8	131.5	183.9	143.9	126.9	170.3	350.2	432.2
TPHC	10000	45.5	34.5	86.8	217.4	233.6	23.8	57994	616.4	34.5	46.2	81250	332.5	37527

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-37 S-2	TP-38 S-1	TP-38 S-2	TP-39 S-1	TP-39 S-2	TP-40 S-1	TP-40 S-2	TP-41 S-1	TP-41 S-2	TP-42 S-1	TP-42 S-2	TP-43 S-1	TP-43 S-2
Sample Depth (ft)		2.2-2.7	0.0-0.5	3.3-3.8	0.0-0.5	2.8-3.3	0.0-0.5	3.3-3.8	0.0-0.5	2.3-2.8	0.0-0.5	2.2-2.7	0.0-0.5	2.6-3.1
Sample Date		6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/6/88	6/6/88	6/6/88	6/6/88
Parameter														
Aluminum	--	4434	13457	9041	15563	6707	8422	4350	4934	3526	5658	6802	6779	4874
Arsenic	20	<5.00	<5.00	<5.00	7.01	5.11	<5.00	6.26	<5.00	6.03	<5.00	7.93	<5.00	5.4
Cadmium	1	<2.50	3.77	<2.50	2.98	<2.50	3.92	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Chromium	--	11.46	28.99	9.01	21.91	11.81	34.42	8.94	62.73	11.75	83.23	18.78	59.36	11.7
Copper	600	34.98	38.69	18.31	149.5	68.81	72.85	51.07	50.86	95.27	57.8	176	84.12	28.66
Lead	100	601	79.44	28.74	117.4	344.9	67.59	198.7	149.2	1932	213.1	664.4	198.6	535.1
Nickel	250	37.13	430.91	30.3	18.27	21.44	6032	31.5	949.2	30.68	1943	266.4	20.99	11.11
Silver	40	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Zinc	1500	339.3	96.72	67.7	92.64	360.6	175.8	145.2	209.3	195.7	228.2	428.1	169.3	230.7
TPHC	10000	652.7	49233	455.1	109.6	48.1	341.2	48.8	34207	3595	333.3	557.4	687.6	2476

Notes: Shaded cells indicate exceedances of the proposed NJDEPE residential surface soil cleanup standards

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TABLE 1-3

CONVERSE PHASE I SOIL SAMPLING RESULTS VS PROPOSED NJDEPE RESIDENTIAL STANDARDS

ALL RESULTS IN (mg/kg)

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-44 S-1	TP-44 S-2	TP-45 S-1	TP-45 S-2	TP-46 S-1	TP-46 S-2	TP-47 S-1	TP-47 S-2
Sample Depth (ft)		0.0-0.5	3.2-3.7	0.0-0.5	3.7-4.2	0.0-0.5	3.4-3.9	0.0-0.5	0.8-1.3
Sample Date		6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/8/88	6/8/88
Parameter									
Aluminum	--	4095	5770	5581	7744	6976	4994	3998	7539
Arsenic	20	<5.00	5.8	<5.00	7.47	<5.00	6.36	<5.00	8.8
Cadmium	1	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	143.3	9.4
Chromium	--	41.9	9.24	12.33	16.83	28.95	15.4	101.6	38.81
Copper	600	31.64	59.43	31.02	70.97	34.67	49.13	77.21	42.62
Lead	100	101.3	858	96.71	897.9	174.4	605	323.4	573.3
Nickel	250	13.23	10.08	12.2	25.75	88.29	20.92	18492	757.1
Silver	40	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	0.59	0.58
Zinc	1500	115.2	438.5	87.97	173.3	179	253.3	304.7	255
TPHC	10000	1331	22063	124.4	351.6	767.8	528.9	125.5	191

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TP-48 S-1	TP-48 S-2	TP-52 S-1	TP-52 S-2	TP-53 S-1	TP-53 S-2	TP-54 S-1	TP-54 S-2	FIELD BLANK
Sample Depth (ft)		0.0-0.5	0.9-1.4	0.0-0.5	0.7-1.2	0.0-0.5	0.6-1.1	0.0-0.5	1.1-1.6	
Sample Date		6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88
Parameter										
Aluminum	--	6819	4964	13244	3024	1950	3027	4378	5166	<0.025
Arsenic	20	<5.00	<5.00	14.1	<5.00	<5.00	<5.00	<5.00	<5.00	<0.010
Cadmium	1	48.35	37.3	138.2	7.35	101.8	<2.50	<2.50	1.84	<0.050
Chromium	--	61.19	55.66	12100	560	30.63	11.36	24.11	34.91	<0.050
Copper	600	46.34	39.9	468.4	65.37	59.37	70.75	37.99	40.24	<0.050
Lead	100	13572	172.4	688.7	383.3	130.1	751.7	256.3	365.9	<0.100
Nickel	250	6619	4029	39929	1003	6076	91.31	11.78	28.39	0.093
Silver	40	0.35	1.2	1	0.55	0.73	0.5	0.42	0.71	<0.001
Zinc	1500	177.4	140.4	1302	156.6	159.8	261.2	96.76	166.7	0.078
TPHC	10000	444.4	347.2	197.4	387.2	177.8	225.1	31.8	85.5	1

Notes: Shaded cells indicate exceedances of the proposed NJDEPE residential surface soil cleanup standards

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TABLE 1-4

CONVERSE PHASE II SOIL SAMPLING RESULTS VS NJDEPE PROPOSED RESIDENTIAL STANDARDS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN MG/KG

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	TB-5S	TB-5D	TB-6S*	TB-6D*	TB-7S	TB-7D	SB-1S	SB-1D	SB-2S	SB-2D	SB-3S	SB-3D	SB-4S
Sample Depth (ft)		0.0-0.5	4.0-4.5	0.0-0.5	3.5-4.0	0.0-0.5	3.5-4.0	0.0-0.5	4.0-4.5	0.0-0.5	4.0-4.5	0.0-0.5	3.5-4.0	0.0-0.5
Sample Date		9/21/88	9/21/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88
Parameter														
cadmium	1	ND	ND	ND	ND	4.7	5.4	3.1	ND	2.7	ND	ND	ND	3.1
chromium	--	18	15.2	30.1	14.4	210.6	131.2	19.8	15	18	12.9	13	15.3	16.4
lead	100	518.4	278.1	24	95.9	82.1	67.3	166	26.2	283.4	25.7	58.5	34.5	648.4
nickel	250	20.2	24.1	30.8	10.2	517.6	603.7	14.8	10.2	15.3	16.1	11.7	18.7	17.8
zinc	1500	400.2	119.3	51.3	141.2	107.3	106.2	130.4	73.9	150.2	42.2	74.7	57.9	319.6
TPHC	10000	4800	310	1100	310	600	88	360	1300	570	400	3100	7900	69

Sample No.	NJDEPE Proposed Cleanup Standards Residential Surface Soil	SB-4D	SB-5S	SB-5D	SB-6S*	SB-6D*	SB-7S	SB-7D	TP-55S	TP-55D	TP-56S	TP-56D	TP-57S	TP-57D
Sample Depth (ft)		2.5-3.0	0.0-0.5	3.0-3.5	0.0-0.5	4.0-4.5	0.0-0.5	4.0-4.5	0.0-0.5	0.5-1.0	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0
Sample Date		9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88
Parameter														
cadmium	1	ND	2.7	ND	ND	ND	ND	ND	9.1	2.4	ND	ND	ND	ND
chromium	--	14.7	22.4	40.5	4.7	8.2	15.7	13.6	533.8	25.1	26.2	31.6	636.9	453.7
lead	100	222.9	565.5	3459	9.9	16.6	315.4	359.3	369.4	185.4	354.8	459.7	175.6	353.7
nickel	250	18.8	22.6	16.2	5.6	10.1	27.6	10.6	1172	31.6	44	84.5	21.6	244.1
zinc	1500	200.1	238.6	334.1	27.2	27	186.9	184.4	296.8	135.6	224.7	401.4	161.2	441.2
TPHC	10000	460	1800	4200	2100	2100	1100	600	61	32	32	72	22	11

Notes: ND - Not Detected
Shaded cells indicate exceedances of the NJDEPE proposed residential surface cleanup standards

by: es
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TABLE 1-4

CONVERSE PHASE II SOIL SAMPLING RESULTS VS NJDEPE PROPOSED RESIDENTIAL STANDARDS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN MG/KG

Sample No.	NJDEPE Proposed Cleanup Standards	TP-58S	TP-58D	TP-59S	TP-59D	TP-60S	TP-60D	TP-61S	TP-61D	TP-62S	TP-62D	TP-63S	TP-63D	TP-64S
Sample Depth (ft)	Residential	0.0-0.5	1.5-2.0	0.0-0.5	1.5-2.0	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0	0.0-0.5	1.5-2.0	0.0-0.5	2.5-3.0	0.0-0.5
Sample Date	Surface Soil	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88
Parameter														
cadmium	1	2.6	ND	4.7	ND	2.7	3.2	3	ND	3.9	2.9	ND	2.5	3.1
chromium	--	44.01	16	520.3	20.3	45	32.8	100.1	9.7	1296	117.9	62.2	20	2488
lead	100	793.4	461.3	332	513.1	71	363.1	171.5	521.8	233.2	405.5	241.8	227.3	180.4
nickel	250	132.7	35.4	1135	30.6	26.1	45.9	33.1	11.7	536.3	87.5	24.7	30.2	373.7
zinc	1500	372.6	279.1	190.3	324	76.2	303.5	148	300.1	207	246.5	196.6	123.3	243.2
TPHC	10000	28	51	13000	59	5800	51	64	32	83	11	150	110	30

Sample No.	NJDEPE Proposed Cleanup Standards	TP-64D	TP-65S	TP-65D	TP-66S	TP-66D	TP-67S	TP-67D	TP-68S	TP-68D	TP-69S	TP-69D	TP-70S	TP-70D
Sample Depth (ft)	Residential	1.5-2.0	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0	0.0-0.5	2.0-2.5	0.0-0.5	4.0-4.5	0.0-0.5	3.0-3.5	0.0-0.5	4.0-4.5
Sample Date	Surface Soil	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88
Parameter														
cadmium	1	ND	4	ND	34.6	ND	ND	3.6	3.7	ND	5.1	ND	5.3	ND
chromium	--	63.4	337.5	13.1	2292	11.8	33.9	58	152.6	85.1	156.8	8	158.2	45.3
lead	100	28.7	260.2	258.6	497.3	404	1081	2106	480.9	317.4	375.9	143.9	223.2	168
nickel	250	28.5	720.8	27.1	7501	27.5	28.7	43.6	25.1	15.7	447.7	10.9	672.8	20.8
zinc	1500	53.8	210.9	93.3	697.5	85.7	225.4	215.5	834.3	134.1	267.4	80.7	162	91.4
TPHC	10000	6	230	470	110	96	26	78	340	220	280	310	1600	160

Notes: ND - Not Detected
Shaded cells indicate exceedances of the NJDEPE proposed residential surface cleanup standards

by: es
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TABLE 1-4

CONVERSE PHASE II SOIL SAMPLING RESULTS VS NJDEPE PROPOSED RESIDENTIAL STANDARDS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN MG/KG

Sample No.	NJDEPE Proposed Cleanup Standards	TP-71S	TP-71D	TP-72S	TP-72D	TP-73S	TP-73D	TP-74S	TP-74D
Sample Depth (ft)	Residential	0.0-0.5	4.0-4.5	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0	0.0-0.5	2.5-3.0
Sample Date	Surface Soil	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88
Parameter									
cadmium	1	8.1	ND	56.2	5.1	23.9	ND	2.2	ND
chromium	–	63.4	11.2	403.9	31.7	439.7	100.8	295.6	71.3
lead	100	265.9	100.8	304.2	94.6	116	103.6	153.5	169.7
nickel	250	2366	12.4	14650	582.9	2384	14.6	54.4	14
zinc	1500	150.8	81.8	2943	114.7	253.6	63.8	120.2	145.1
TPHC	10000	2300	18	620	220	57	7	130	13

Sample No.	NJDEPE Proposed Cleanup Standards	TP-75S	TP-75D	TP-76S	TP-76D	TP-77S	TP-77D	TP-78S
Sample Depth (ft)	Residential	0.0-0.5	0.5-1.0	0.0-0.5	2.0-2.5	0.0-0.5	3.0-3.5	0.0-0.5
Sample Date	Surface Soil	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88
Parameter								
cadmium	1	3.6	16.4	17.8	2.8	3.3	3.1	11.8
chromium	–	159.6	19.4	373.4	262.6	219.5	1708	139.3
lead	100	65.8	42.7	150.7	88.5	184	109.5	213.1
nickel	250	281	3345	52.1	55.1	78.2	103.1	2569
zinc	1500	129.6	160.2	87.8	119.3	179.1	178.8	314.8
TPHC	10000	1300	6100	100	3300	81	65	3100

Notes: ND - Not Detected
Shaded cells indicate exceedances of the NJDEPE proposed residential surface cleanup standards

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TABLE 1-5

CONVERSE PHASE I SOIL SAMPLING RESULTS VS NJDEPE PROPOSED NON-RESIDENTIAL STANDARDS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN (mg/kg)

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-1 S-1	TP-1 S-2	TP-2 S-1	TP-3 S-1	TP-3 S-2	TP-4 S-1	TP-5 S-1	TP-5 S-2	TP-6 S-1	TP-6 S-2	TP-7 S-1	TP-8 S-1	TP-8 S-2
Sample Depth (ft)		0-0.5	1.3-1.8	0-0.5	0-0.5	1.3-1.8	0-0.5	0-0.5	1.4-1.9	0-0.5	1.0-1.5	0-0.5	0-0.5	1.5-2.0
Sample Date		5/31/88	6/3/88	5/31/88	5/31/88	6/3/88	5/31/88	5/31/88	6/8/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88
Parameter														
Aluminum	--	9895	7307	7984	12090	10297	10457	9296	4778	29650	5150	9122	7417	4624
Arsenic	20	<5.00	4.4	5.32	7.02	<5.00	5.98	6.77	<5.00	8.75	<5.00	5.61	6.27	<5.00
Cadmium	100	97.1	7.86	10.95	12.69	2.93	13.1	<2.50	<2.50	301.1	10.6	37.87	<2.50	2.46
Chromium	--	68.67	63.77	123.7	56.32	17.94	168.2	69.38	11.76	112.2	35.72	53.07	30.51	26.09
Copper	600	30.28	154	28.82	63.64	20.77	57.77	58.06	27.24	45.34	52.51	47.46	41.31	79.65
Lead	600	428.9	705.6	598.7	344.6	177.9	473.3	821.3	179	250.3	688.9	990.9	442.3	907.7
Nickel	2400	5456	526.2	1309	2530	15.75	2919	107.5	129.8	23585	709.8	7293	39.53	114.3
Silver	2000	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	0.57	<3.64	1.33	<2.50	<2.50	1.12
Zinc	1500	373.5	390	448.5	336.1	83.13	581.5	471.3	108.9	277.3	453.7	427.3	306.2	411.6
TPHC	10000	1856	217.2	214	156	24.4	157	338	96.7	3638	258.9	247	121	454.5

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-9 S-1	TP-10 S-1	TP-10 S-2	TP-11 S-1	TP-11 S-2	TP-12 S-1	TP-13 S-1	TP-13 S-2	TP-14 S-1	TP-15 S-1	TP-15 S-2	TP-16 S-1	TP-16 S-2
Sample Depth (ft)		0-0.5	0-0.5	1.4-1.9	0-0.5	0.9-1.4	0-0.5	0-0.5	0.8-1.3	0-0.5	0-0.5	0.7-1.2	0-0.5	0.9-1.4
Sample Date		5/31/88	5/31/88	6/3/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88	5/31/88	6/8/88
Parameter														
Aluminum	--	9934	6753	5981	15787	7133	7268	8594	3706	12910	12551	5219	11546	8402
Arsenic	20	8.55	<5.00	5.23	5.65	<5.00	<5.00	6.05	<5.00	6.94	<7.10	<5.00	<5.00	<5.00
Cadmium	100	4.01	37.93	3.54	29.03	19.66	21.2	<2.50	3.08	20.3	124	8.59	<2.50	160.9
Chromium	--	96.97	50.97	46.72	86.08	73.53	54.23	30.31	22.62	43.84	92.55	28.98	43.49	83.44
Copper	600	78.61	43	41.78	45.53	39.94	35.42	48.08	95.82	44.82	54.38	34.94	34.22	67.39
Lead	600	514.1	1060	852.6	628.1	651	563.8	550	1157	568.4	436.7	236.8	266.1	173.8
Nickel	2400	1452	4608	99.36	4607	2437	3449	73.39	166.3	2695	13509	769.7	1389	17652
Silver	2000	<2.50	<2.50	<2.50	<2.50	0.69	<2.50	<2.50	0.48	<2.50	<2.50	0.37	<2.50	0.32
Zinc	1500	527.5	492.7	409.7	569.6	942.7	786.6	552.8	913.3	1108	336.2	171.01	189.9	150.8
TPHC	10000	52	188	309	400	130.9	564	90	1707.8	1891	3142	64	107	5986.8

by: es

Notes: Shaded cells indicate exceedances of the proposed NJDEPE cleanup standards

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TABLE 1-5

CONVERSE PHASE I SOIL SAMPLING RESULTS VS NJDEPE PROPOSED NON-RESIDENTIAL STANDARDS

ALL RESULTS IN (mg/kg)

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-17 S-1	TP-18 S-1	TP-18 S-2	TP-19 S-1	TP-20 S-1	TP-20 S-2	TP-21 S-1	TP-21 S-2	TP-22 S-1	TP-22 S-2	TP-23 S-1	TP-23 S-2	TP-24 S-1
Sample Depth (ft)		0-0.5	0-0.5	1.6-2.1	0-0.5	0-0.5	1.6-2.1	0-0.5	2.7-3.2	0.0-0.5	2.6-3.1	0.0-0.5	3.3-3.8	0.0-0.5
Sample Date		5/31/88	5/31/88	6/8/88	5/31/88	5/31/88	6/8/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88
Parameter														
Aluminum	--	8165	11006	13094	17169	5476	6783	12918	8442	8979	9050	8926	6888	7263
Arsenic	20	<5.00	6.7	<5.00	7.93	<5.00	6.48	6.53	6.44	5.64	7.64	6.04	7.8	<5.00
Cadmium	100	<2.50	5.3	3.04	<2.50	5.73	2.89	3.55	<2.50	2.17	2.72	2.85	3.46	2.6
Chromium	--	57.64	243.1	26.54	58.38	224.4	30.2	77.86	211.3	35.35	34.06	146.1	33.29	78.68
Copper	600	43.35	49.91	29.53	37.04	39.37	50.65	45.79	40.69	35.44	37.5	55.09	84.12	70.04
Lead	600	282.5	625.8	188.2	374.9	409.2	1131	212	358	120.2	325.7	479.5	353.15	314.6
Nickel	2400	308.7	1069	22.45	983	576.9	30.07	23.56	19.11	17.05	15.86	22.5	24.17	50.49
Silver	2000	<2.50	<2.50	0.39	<2.50	<2.50	0.54	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Zinc	1500	211.9	1691	110.9	286.6	410.8	563.3	357.4	152.7	95.22	132.7	245.4	189.1	292.3
TPHC	10000	399	411	158	131	215	387.4	37.2	49.3	175.4	70.9	200	456.7	170.1

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-24 S-2	TP-25 S-1	TP-25 S-2	TP-26 S-1	TP-26 S-2	TP-27 S-1	TP-27 S-2	TP-28 S-1	TP-28 S-2	TP-29 S-1	TP-29 S-2	TP-30 S-1	TP-30 S-2
Sample Depth (ft)		3.5-4.0	0.0-0.5	3.4-3.9	0.0-0.5	2.0-2.5	0-0.5	3.5-4.0	0.0-0.5	1.4-1.9	0.0-0.5	1.9-2.4	0.0-0.5	1.7-2.3
Sample Date		6/6/88	6/3/88	6/3/88	6/6/88	6/6/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88
Parameter														
Aluminum	--	8872	12559	9506	7855	6461	15805	6124	7539	5488	8331	6425	5968	4574
Arsenic	20	12.15	6.69	<5.00	<5.00	6.01	6.94	<5.00	<5.00	<5.00	6.04	<5.00	<5.00	<5.00
Cadmium	100	2.82	3.04	2.52	<2.50	<2.50	5.27	<2.50	3.81	<2.50	<2.50	<2.50	<2.50	<2.50
Chromium	--	40.15	44.79	19.35	39.15	49.78	102.1	8.78	38.12	11.82	116.2	21.47	57.39	9.77
Copper	600	53.28	45.15	36.85	91.26	73.21	757.1	16.89	61.38	16.95	65.93	28.27	44.97	42.2
Lead	600	405.6	515.3	620.4	580.2	462.7	188.2	70.12	1079	90.35	424.7	83.46	561.9	98.96
Nickel	2400	24.79	25.33	18.14	34.03	16.74	37.92	10.22	478.09	125.4	29.02	12.89	17.48	6.92
Silver	2000	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Zinc	1500	349.4	204	165.1	397.4	339.4	188.2	54.22	309.8	116.5	255.6	74.98	167	99.46
TPHC	10000	212.8	62.7	249.4	38.3	286.3	73.9	145.1	257.1	49.2	757.6	23.3	129.5	242

by: es

Notes: Shaded cells indicate exceedances of the proposed NJDEPE cleanup standards

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TABLE 1-5

CONVERSE PHASE I SOIL SAMPLING RESULTS VS NJDEPE PROPOSED NON-RESIDENTIAL STANDARDS

ALL RESULTS IN (mg/kg)

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-31 S-1	TP-31 S-2	TP-32 S-1	TP-32 S-2	TP-33 S-1	TP-33 S-2	TP-34 S-1	TP-34 S-2	TP-35 S-1	TP-35 S-2	TP-36 S-1	TP-36 S-2	TP-37 S-1
Sample Depth (ft)		0.0-0.5	2.4-2.9	0.0-0.5	3.1-3.6	0.0-0.5	2.3-2.8	0.0-0.5	2.3-2.8	0.0-0.5	1.9-2.4	0.0-0.5	1.7-2.2	0.0-0.5
Sample Date		6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88
Parameter														
Aluminum	--	9205	5957	4228	5631	5636	5701	5921	6100	3611	7857	891.5	4065	7802
Arsenic	20	<5.00	<5.00	<5.00	5.76	<5.00	5.19	5.29	6.47	<5.00	<5.00	<7.26	8.82	<5.00
Cadmium	100	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	163.4	3.16	23.4
Chromium	--	23.18	9.08	45.79	127.9	22.89	13.17	67.75	11.21	28.66	11.15	170	13.55	81.37
Copper	600	1121	24.28	61.84	66.17	44.77	46.5	42.33	69.34	98.7	22.86	64.4	275.9	60.05
Lead	600	70.89	90.22	501.1	243.8	161.7	163.8	180.5	281.18	61.2	70.53	184.3	590.6	196.2
Nickel	2400	26	11.08	21.11	28.5	15.48	10.91	373.1	22.86	67.06	12.05	34193	103.8	3668
Silver	2000	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<3.63	<2.50	<2.50
Zinc	1500	148.6	72.54	244.8	124.7	105.1	141.8	131.5	183.9	143.9	126.9	170.3	350.2	432.2
TPHC	10000	45.5	34.5	86.8	217.4	233.6	23.8	57994	616.4	34.5	46.2	81250	332.5	37527

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-37 S-2	TP-38 S-1	TP-38 S-2	TP-39 S-1	TP-39 S-2	TP-40 S-1	TP-40 S-2	TP-41 S-1	TP-41 S-2	TP-42 S-1	TP-42 S-2	TP-43 S-1	TP-43 S-2
Sample Depth (ft)		2.2-2.7	0.0-0.5	3.3-3.8	0.0-0.5	2.8-3.3	0.0-0.5	3.3-3.8	0.0-0.5	2.3-2.8	0.0-0.5	2.2-2.7	0.0-0.5	2.6-3.1
Sample Date		6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/3/88	6/6/88	6/6/88	6/6/88	6/6/88
Parameter														
Aluminum	--	4434	13457	9041	15563	6707	8422	4350	4934	3526	5658	6802	6779	4874
Arsenic	20	<5.00	<5.00	<5.00	7.01	5.11	<5.00	6.26	<5.00	6.03	<5.00	7.93	<5.00	5.4
Cadmium	100	<2.50	3.77	<2.50	2.98	<2.50	3.92	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Chromium	--	11.46	28.99	9.01	21.91	11.81	34.42	8.94	62.73	11.75	83.23	18.78	59.36	11.7
Copper	600	34.98	38.69	18.31	149.5	68.81	72.85	51.07	50.86	95.27	57.8	176	84.12	28.66
Lead	600	601	79.44	28.74	117.4	344.9	67.59	198.7	149.2	1932	213.1	664.4	198.6	635.1
Nickel	2400	37.13	430.91	30.3	18.27	21.44	6032	31.5	949.2	30.68	1943	266.4	20.99	11.11
Silver	2000	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50
Zinc	1500	339.3	96.72	67.7	92.64	360.6	175.8	145.2	209.3	195.7	228.2	428.1	169.3	230.7
TPHC	10000	652.7	49233	455.1	109.6	48.1	341.2	48.8	34207	3595	333.3	557.4	687.6	2476

by: es

Notes: Shaded cells indicate exceedances of the proposed NJDEPE cleanup standards

filename: B:\goody\tpsoils.xls

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TABLE 1-5

CONVERSE PHASE I SOIL SAMPLING RESULTS VS NJDEPE PROPOSED NON-RESIDENTIAL STANDARDS

ALL RESULTS IN (mg/kg)

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-44 S-1	TP-44 S-2	TP-45 S-1	TP-45 S-2	TP-46 S-1	TP-46 S-2	TP-47 S-1	TP-47 S-2
Sample Depth (ft)		0.0-0.5	3.2-3.7	0.0-0.5	3.7-4.2	0.0-0.5	3.4-3.9	0.0-0.5	0.8-1.3
Sample Date		6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/6/88	6/8/88	6/8/88
Parameter									
Aluminum	--	4095	5770	5581	7744	6976	4994	3998	7539
Arsenic	20	<5.00	5.8	<5.00	7.47	<5.00	6.36	<5.00	8.8
Cadmium	100	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	143.3	9.4
Chromium	--	41.9	9.24	12.33	16.83	28.95	15.4	101.6	38.81
Copper	600	31.64	59.43	31.02	70.97	34.67	49.13	77.21	42.62
Lead	600	101.3	858	96.71	897.9	174.4	605	323.4	573.3
Nickel	2400	13.23	10.08	12.2	25.75	88.29	20.92	18492	757.1
Silver	2000	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	0.59	0.58
Zinc	1500	115.2	438.5	87.97	173.3	179	253.3	304.7	255
TPHC	10000	1331	22063	124.4	351.6	767.8	528.9	125.5	191

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-48 S-1	TP-48 S-2	TP-52 S-1	TP-52 S-2	TP-53 S-1	TP-53 S-2	TP-54 S-1	TP-54 S-2	FIELD BLANK
Sample Depth (ft)		0.0-0.5	0.9-1.4	0.0-0.5	0.7-1.2	0.0-0.5	0.6-1.1	0.0-0.5	1.1-1.6	
Sample Date		6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88	6/8/88
Parameter										
Aluminum	--	6819	4964	13244	3024	1950	3027	4378	5166	<0.025
Arsenic	20	<5.00	<5.00	14.1	<5.00	<5.00	<5.00	<5.00	<5.00	<0.010
Cadmium	100	48.35	37.3	138.2	7.35	101.8	<2.50	<2.50	1.84	<0.050
Chromium	--	61.19	55.66	12100	560	30.63	11.36	24.11	34.91	<0.050
Copper	600	46.34	39.9	468.4	65.37	59.37	70.75	37.99	40.24	<0.050
Lead	600	13572	172.4	688.7	383.3	130.1	751.7	256.3	365.9	<0.100
Nickel	2400	6619	4029	39929	1003	6076	91.31	11.78	28.39	0.093
Silver	2000	0.35	1.2	1	0.55	0.73	0.5	0.42	0.71	<0.001
Zinc	1500	177.4	140.4	1302	156.6	159.8	261.2	96.76	166.7	0.078
TPHC	10000	444.4	347.2	197.4	387.2	177.8	225.1	31.8	85.5	1

by: es

Notes: Shaded cells indicate exceedances of the proposed NJDEPE cleanup standards

filename: B:\goody\tpsoils.xls

TABLE 1-6

CONVERSE PHASE II SOIL SAMPLING RESULTS VS NJDEPE PROPOSED NON-RESIDENTIAL STANDARDS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN MG/KG

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TB-5S	TB-5D	TB-6S*	TB-6D*	TB-7S	TB-7D	SB-1S	SB-1D	SB-2S	SB-2D	SB-3S	SB-3D	SB-4S
Sample Depth (ft)		0.0-0.5	4.0-4.5	0.0-0.5	3.5-4.0	0.0-0.5	3.5-4.0	0.0-0.5	4.0-4.5	0.0-0.5	4.0-4.5	0.0-0.5	3.5-4.0	0.0-0.5
Sample Date		9/21/88	9/21/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88
Parameter														
cadmium	100	ND	ND	ND	ND	4.7	5.4	3.1	ND	2.7	ND	ND	ND	3.1
chromium	--	18	15.2	30.1	14.4	210.6	131.2	19.8	15	18	12.9	13	15.3	16.4
lead	600	518.4	278.1	24	95.9	82.1	67.3	166	26.2	283.4	25.7	58.5	34.5	648.4
nickel	2400	20.2	24.1	30.8	10.2	517.6	603.7	14.8	10.2	15.3	16.1	11.7	18.7	17.8
zinc	1500	400.2	119.3	51.3	141.2	107.3	106.2	130.4	73.9	150.2	42.2	74.7	57.9	319.6
TPHC	10000	4800	310	1100	310	600	88	360	1300	570	400	3100	7900	69

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	SB-4D	SB-5S	SB-5D	SB-6S*	SB-6D*	SB-7S	SB-7D	TP-55S	TP-55D	TP-56S	TP-56D	TP-57S	TP-57D
Sample Depth (ft)		2.5-3.0	0.0-0.5	3.0-3.5	0.0-0.5	4.0-4.5	0.0-0.5	4.0-4.5	0.0-0.5	0.5-1.0	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0
Sample Date		9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/22/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88
Parameter														
cadmium	100	ND	2.7	ND	ND	ND	ND	ND	9.1	2.4	ND	ND	ND	ND
chromium	--	14.7	22.4	40.5	4.7	8.2	15.7	13.6	533.8	25.1	26.2	31.6	636.9	453.7
lead	600	222.9	565.5	3459	9.9	16.6	315.4	359.3	369.4	185.4	354.8	459.7	175.6	353.7
nickel	2400	18.8	22.6	16.2	5.6	10.1	27.6	10.6	1172	31.6	44	84.5	21.6	244.1
zinc	1500	200.1	238.6	334.1	27.2	27	186.9	184.4	296.8	135.6	224.7	401.4	161.2	441.2
TPHC	10000	460	1800	4200	2100	2100	1100	600	61	32	32	72	22	11

Notes: ND - Not Detected
shaded cells indicate exceedances of the NJDEPE proposed cleanup standards

by: es
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TABLE 1-6

CONVERSE PHASE II SOIL SAMPLING RESULTS VS NJDEPE PROPOSED NON-RESIDENTIAL STANDARDS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN MG/KG

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-58S	TP-58D	TP-59S	TP-59D	TP-60S	TP-60D	TP-61S	TP-61D	TP-62S	TP-62D	TP-63S	TP-63D	TP-64S
Sample Depth (ft)		0.0-0.5	1.5-2.0	0.0-0.5	1.5-2.0	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0	0.0-0.5	1.5-2.0	0.0-0.5	2.5-3.0	0.0-0.5
Sample Date		9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88
Parameter														
cadmium	100	2.6	ND	4.7	ND	2.7	3.2	3	ND	3.9	2.9	ND	2.5	3.1
chromium	--	44.01	16	520.3	20.3	45	32.8	100.1	9.7	1296	117.9	62.2	20	2488
lead	600	793.4	461.3	332	513.1	71	363.1	171.5	521.8	233.2	405.5	241.8	227.3	180.4
nickel	2400	132.7	35.4	1135	30.6	26.1	45.9	33.1	11.7	536.3	87.5	24.7	30.2	373.7
zinc	1500	372.6	279.1	190.3	324	76.2	303.5	148	300.1	207	246.5	196.6	123.3	243.2
TPHC	10000	28	51	13000	59	5800	51	64	32	83	11	150	110	30

Sample No.	NJDEPE Proposed Cleanup Standards Non-Residential Surface Soil	TP-64D	TP-65S	TP-65D	TP-66S	TP-66D	TP-67S	TP-67D	TP-68S	TP-68D	TP-69S	TP-69D	TP-70S	TP-70D
Sample Depth (ft)		1.5-2.0	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0	0.0-0.5	2.0-2.5	0.0-0.5	4.0-4.5	0.0-0.5	3.0-3.5	0.0-0.5	4.0-4.5
Sample Date		9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/29/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88
Parameter														
cadmium	100	ND	4	ND	34.6	ND	ND	3.6	3.7	ND	5.1	ND	5.3	ND
chromium	--	63.4	337.5	13.1	2292	11.8	33.9	58	152.6	85.1	156.8	8	158.2	45.3
lead	600	28.7	260.2	258.6	497.3	404	1081	2106	480.9	317.4	375.9	143.9	223.2	168
nickel	2400	28.5	720.8	27.1	7501	27.5	28.7	43.6	25.1	15.7	447.7	10.9	672.8	20.8
zinc	1500	53.8	210.9	93.3	697.5	85.7	225.4	215.5	834.3	134.1	267.4	80.7	162	91.4
TPHC	10000	6	230	470	110	96	26	78	340	220	280	310	1600	160

Notes: ND - Not Detected
shaded cells indicate exceedances of the NJDEPE proposed cleanup standards

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TABLE 1-6

CONVERSE PHASE II SOIL SAMPLING RESULTS VS NJDEPE PROPOSED NON-RESIDENTIAL STANDARDS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN MG/KG

Sample No.	NJDEPE Proposed Cleanup Standards	TP-71S	TP-71D	TP-72S	TP-72D	TP-73S	TP-73D	TP-74S	TP-74D
Sample Depth (ft)	Non-Residential	0.0-0.5	4.0-4.5	0.0-0.5	2.0-2.5	0.0-0.5	2.5-3.0	0.0-0.5	2.5-3.0
Sample Date	Surface Soil	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88
Parameter									
cadmium	100	8.1	ND	56.2	5.1	23.9	ND	2.2	ND
chromium	--	63.4	11.2	403.9	31.7	439.7	100.8	295.6	71.3
lead	600	265.9	100.8	304.2	94.6	116	103.6	153.5	169.7
nickel	2400	2366	12.4	14650	582.9	2384	14.6	54.4	14
zinc	1500	150.8	81.8	2943	114.7	253.6	63.8	120.2	145.1
TPHC	10000	2300	18	620	220	57	7	130	13

Sample No.	NJDEPE Proposed Cleanup Standards	TP-75S	TP-75D	TP-76S	TP-76D	TP-77S	TP-77D	TP-78S
Sample Depth (ft)	Non-Residential	0.0-0.5	0.5-1.0	0.0-0.5	2.0-2.5	0.0-0.5	3.0-3.5	0.0-0.5
Sample Date	Surface Soil	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88	9/30/88
Parameter								
cadmium	100	3.6	16.4	17.8	2.8	3.3	3.1	11.8
chromium	--	159.6	19.4	373.4	262.6	219.5	1708	139.3
lead	600	65.8	42.7	150.7	88.5	184	109.5	213.1
nickel	2400	281	3345	52.1	55.1	78.2	103.1	2569
zinc	1500	129.6	160.2	87.8	119.3	179.1	178.8	314.8
TPHC	10000	1300	6100	100	3300	81	65	3100

Notes: ND - Not Detected
shaded cells indicate exceedances of the NJDEPE proposed cleanup standards

by: es
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1.2.2 Converse Groundwater Sample Results

A round of groundwater samples from the seven monitoring wells was collected and analyzed for volatile organic compounds (VOCs), TPHC, cadmium, chromium, lead, nickel and zinc. The sample results are presented in Table 1-7. The sample from MW-3 was analyzed for Priority Pollutants +40 (PP+40) and TPHC because it is near the HWSA. The highest levels of contaminants were detected in the two upgradient wells, MW-6 and MW-7, located at the north boundary of the site adjacent to the railroad right-of-way. These samples contained levels of benzene, chlorobenzene, 1,2-dichlorobenzene, 1,3-dichlorobenzene, and 1,4-dichlorobenzene above the NJDEPE proposed cleanup standards for groundwater.

In sample MW-1, which was located east of the WWTP Discharge Pit, vinyl chloride (29.8 ppb) exceeded the cleanup standard (2 ppb). There were no contaminants detected above the cleanup standards in MW-3. The samples from MW-2 and MW-4 both contained trichloroethene (TCE) at levels (360 ppb and 78.9 ppb, respectively) above the cleanup standard (1 ppb). The sample from MW-5 contained several chlorinated VOCs and benzene at levels above the cleanup standards. The only metal detected above the cleanup standard was chromium at concentrations ranging up to 600 ppb in the sample from MW-4 which suggests that metals are not leaching appreciably (if at all) from the soils.

There is a difference in groundwater chemistry across the site, as indicated by the presence of dichlorobenzenes detected only in the 2 wells (MW-6 and MW-7). The rest of the well samples were found to contain various other chlorinated VOCs including TCE, as well as vinyl chloride (but only in the sample from MW-1).

Converse concluded that the benzene and chlorobenzene contamination at upgradient wells is the result of an off-site source. The contaminant levels detected in MW-6 and MW-7 are not likely be the result of the waste stream discharges that occurred in this area. According to the Converse report, the discharge pit was downgradient of MW-6, and monthly testing of the WWTP effluent has only once detected trace amounts of benzene (0.0012 ppm). The testing has never indicated chlorobenzenes in the waste stream.

TABLE 1-7

CONVERSE GROUNDWATER SAMPLING RESULTS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN ug/l

SAMPLE NUMBER: SAMPLE DATE: COMPOUNDS: VOLATILE ORGANIC COMPOUNDS	NJDEPE Proposed Cleanup Standards (ug/l)1	MW-1 10/19/88	MW-2 10/19/88	MW-3 10/19/88	MW-4 10/19/88	MW-5 10/19/88	MW-6 10/19/88	MW-7 10/19/88	FIELD BLANK 10/19/88	TRIP BLANK 10/19/88
vinyl chloride	2	29.8	ND	ND	ND	ND	ND	ND	ND	ND
trichloroethene	1	ND	360	ND	78.9	7.2	ND	ND	ND	ND
1,1-dichloroethene	2	ND	ND	ND	ND	2.6 J	ND	ND	ND	ND
1,1-dichloroethane	70	ND	ND	ND	ND	3.1 J	ND	ND	ND	ND
chloroform	6	ND	ND	ND	ND	2.3	ND	ND	ND	2.8
1,1,1-trichloroethane	30	ND	ND	ND	ND	6.1	ND	ND	ND	ND
carbon tetrachloride	2	ND	ND	ND	ND	4.8	ND	ND	ND	ND
bromodichloromethane	10	ND	ND	ND	ND	1.6 J	ND	ND	ND	ND
1,2-dichloropropane	1	ND	ND	ND	ND	3.4 J	ND	ND	ND	ND
benzene	1	ND	ND	ND	ND	5.8	117	36.2	ND	1.4 J
tetrachloroethane	1	ND	ND	ND	ND	16.4	ND	ND	ND	8.9
ethylbenzene	700	ND	ND	ND	ND	2.9 J	ND	ND	ND	1.4 J
chlorobenzene	5	ND	ND	ND	ND	ND	1017	1541	ND	ND
methylene chloride	30	ND	ND	ND	ND	ND	ND	ND	ND	7.1
TOTAL VOLATILES		29.8	360	0	78.9	56.2	1873	36.2	0	21.6
LIBRARY SEARCH (TOTAL)		407.8	389.3	429.6	113.2	117.4	31.1	121.8	2310.7	236.6
LAB CONTAMINANTS		407.8	389.3	396.8	73.7	114.4	31.1	121.8	2310.7	126
NON-TARGETED COMPOUNDS		0	0	32.8	39.5	3	0	0	0	110.6
BASE NEUTRAL COMPOUNDS										
1,3-dichlorobenzene	600	ND	ND	ND	ND	ND	151	1103	ND	ND
1,4-dichlorobenzene	70	ND	ND	ND	ND	ND	378	ND	ND	ND
1,2-dichlorobenzene	600	ND	ND	ND	ND	ND	210	1253	ND	ND
hexachlorobenzene	10	NT	NT	1.4 J	NT	NT	NT	NT	NT	NT
bis(2-ethylhexyl)phthalate	30	NT	NT	1.6 J	NT	NT	NT	NT	NT	NT
di-n-octyl phthalate	100	NT	NT	2.5	NT	NT	NT	NT	NT	NT
TOTAL BASE NEUTRALS		NT	NT	5.5	NT	NT	NT	NT	NT	NT
LIBRARY SEARCH		NT	NT	22	NT	NT	NT	NT	NT	NT

NOTES: J - BELOW MINIMUM DETECTION LEVEL
ND - NOT DETECTED
NT - NOT TESTED
1 - STANDARDS ARE FOR CLASS II-A GROUNDWATERS

by: es
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TABLE 1-7

CONVERSE GROUNDWATER SAMPLING RESULTS

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

ALL RESULTS IN ug/l

SAMPLE NUMBER: SAMPLE DATE: COMPOUNDS: VOLATILE ORGANIC COMPOUNDS	NJDEPE Proposed Cleanup Standards (ug/l)1	MW-1 10/19/88	MW-2 10/19/88	MW-3 10/19/88	MW-4 10/19/88	MW-5 10/19/88	MW-6 10/19/88	MW-7 10/19/88	FIELD BLANK 10/19/88	TRIP BLANK 10/19/88
ACID EXTRACTABLE COMPOUNDS		NT	NT	ND	NT	NT	NT	NT	NT	NT
phenol	4000	NT	NT	<0.011	NT	NT	NT	NT	NT	NT
PESTICIDES		NT	NT	ND	NT	NT	NT	NT	NT	NT
PCBs	0.5	NT	NT	ND	NT	NT	NT	NT	NT	NT
PETROLEUM HYDROCARBONS		<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	NT	NT
INORGANICS										
cadmium	4	<50	<50	<50	<50	<50	<50	<50	NT	NT
chromium	100	540	450	<50	600	400	<50	<50	NT	NT
lead	10	<5	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	NT	NT
nickel	100	<50	<50	<50	<50	<50	<50	<50	NT	NT
zinc	5000	<50	<50	<50	<50	160	<50	<50	NT	NT
cyanide	200	NT	NT	<25	NT	NT	NT	NT	NT	NT

by: es
filename: B:\goody\congw.xls

NOTES: J - BELOW MINIMUM DETECTION LEVEL
ND - NOT DETECTED
NT - NOT TESTED
1 - STANDARDS ARE FOR CLASS II-A GROUNDWATERS

The sites across Belleville Pike are upgradient of the Goody site, have the same documented general contamination and have confirmed contamination by volatiles. In addition, piezometers installed by WCC show no potential for downward migration of contaminants from Goodys' near surface water table in the man-made fill.

1.2.3 Converse Groundwater Levels

Based on groundwater level measurements made by Converse, the depth to the water table at the site averages 4 feet below ground surface. A very flat hydraulic gradient (<0.001 ft/ft) exists at the site and groundwater flow is presently to the west, although it reportedly has shown other directional flow components in the past. Surface water elevation measurements taken in Dead Horse Creek indicate that the creek is an influent stream during periods of high surface water. The creek also may be tidally influenced as is much of the Meadowlands.

2.1 WELL SAMPLING

A preliminary round of groundwater sampling in the seven existing wells began on October 26, 1992 to confirm the previous groundwater sampling results. NJDEPE Quality Assurance (QA) requirements for groundwater sampling were met. A centrifugal pump and dedicated hosing was used to purge each well. A bottom check valve was installed on the pump suction hose to prevent backflow into the well. At least three casing volumes were purged from each well unless the well was pumped dry and did not recover 90% of the well volume in less than one hour.

All monitoring wells were sampled within one hour after purging. Dedicated, laboratory cleaned, stainless-steel bailers with teflon check valve assemblies were used to collect the groundwater samples. The suspension line attached to each bailer was a stainless steel leader attached to polypropylene cord. Field parameters were collected at the start of purging, end of purging, and during sampling. Table 2-1 summarizes the field parameters for sampling the seven monitoring wells.

The first bailer of groundwater was transferred to 40 ml vials for the volatile organics analyses. Subsequent bailers were used to fill the remaining sample containers for analyses of base neutral organics and metals. The samples were preserved, packed, and transferred to Accredited Labs under standard chain-of-custody protocols.

After the piezometers were installed and the relationship between the shallow and deep aquifers evaluated, the five shallow piezometers were sampled to evaluate the effects of the metal contamination in the fill on the shallow groundwater. Because these samples were collected from piezometers as opposed to monitoring wells, NJDEPE sampling protocols were not completely met. The piezometers were purged using dedicated polyurethane bailers and due to the slow recovery of the wells, the three-well volume requirement could not be met.

TABLE 2-1

GROUND WATER SAMPLING DATA

GOODY PRODUCTS, INC.

KEARNY, NEW JERSEY

92C4246

October,1992

	PURGING DATA										SAMPLING DATA			PRE-PURGE DATA			POST-PURGE DATA			PRE-SAMPLING DATA		
ll nber ermit	Date And Time Of Measurement	DTW Static	Depth to Top of Screen (feet)	Depth Of Well (feet)	Height Of Water Column (feet)	Three Casing Volumns (gallons)	Intake Depth, Purge Method	Volume Of Water Purged (gallons), And Elapsed Time	DTW After Purging	REMARKS Organic vapor readings, color, odor, turbidity, etc.	Time	DTW Prior to Sampling	REMARKS Sample analyses, color, clarity, etc.	pH	Temp. (C)	Specific Cond. (umoh/ cm)	pH	Temp. (C)	Specific Cond. (umoh/ cm)	pH	Temp. (C)	Specific Cond. (umoh/ cm)
/-1	10/26/92	4.24	10.24	20.24	16	31.33	20 cent	32, 22 min	4.60	Water slightly silty	1350	4.65		5.92	15.60	11.75	5.89	14.10	14.54	14.30	14.30	14.23
/-2	10/26/92	5.31	9.50	19.50	14.20	27.8	19.5 cent	30, 6 min	8.20	Water is silty Dark grayish brown	1405	5.7		6.42	14.00	5.99	6.02	12.50	10.07	5.96	12.40	8.62
/-3	10/26/92	5.83	10.60	20.60	14.80	29.4	20.5 cent	12, 2 min 11, 2 min	dry	Water is orange	1245	12.2		6.82	17.00	4.23	5.88	14.80	5.50	5.92	14.20	5.59
/-4	10/26/92	4	9.3	19.3	15.3	31.33	19 cent	34, 8 min	11.02	Water is orange, it cleared after purge	1120	3.11	Slight sulfur odor	7.70	18.40	7.95	6.80	15.10	11.45	6.41	14.00	9.02
/-5	10/26/92	2.71	8.25	18.25	15.54	30.4	18.0 cent	33, 8 min	5.50	Water is light brownish green	1210	2.89		5.75	17.30	11.53	5.97	15.00	6.99	5.86	15.00	6.79
/-6	10/27/92	1.79	7.66	17.66	15.87	31.11	17.5 cent	31, 3 min	5.32		1055	1.95		6.73	12.20	5.01	6.85	13.40	2.00	6.33	13.10	1775.00
/-7	10/26/92	5.32	9.17	19.17	13.85	27.12	19 cent	27.5, 18 min	6.30		1500			6.64	15.10	3.81	6.25	12.80	3.29	6.23	13.60	13.12

/V - Depth To Water, in feet, all measurements taken from Top Of Casing (TOC)

samples collected with stainless steel bailers

t - centrifugal pump

Inspector(s): ES / MM

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Approximately one well volume was removed from each of the shallow piezometers. The water removed from the piezometers became more turbid as the piezometers were purged. The turbidity is likely the result of the piezometers not being completely developed after installation.

The five shallow piezometers were sampled for unfiltered TAL metals and cyanide. In addition, two piezometers (PZ-2 and PZ-3) were sampled for VOs. These piezometers were selected because of the previous HydroPunch sampling results and their location near soil volatile organic hot spots. These samples were preserved, packed with ice, and submitted to Accredited Labs under standard chain-of-custody protocols.

2.2 SLUG TESTS

To determine the permeability of the saturated soils, two types of in-situ permeability tests were performed on all on-site monitoring wells: falling head slug tests and rising head slug tests. In a falling head test, a slug of known volume is added to a the well in which the water level is at equilibrium, thereby raising the water level in the well. The subsequent fall in water level over time is measured as the water level returns to equilibrium. In a rising head test, a slug of known volume is removed from a well in which the water level is at equilibrium, thereby lowering the water level in the well. The subsequent rise in water level over time is measured as the water level returns to equilibrium.

To perform a falling head test, the static water level was measured and recorded. A pressure transducer was placed in the well and positioned at a depth where it would not be struck by the slug. The pressure transducer was connected to a digital data logger (Hermit Model SE-1000 manufactured by In-Situ of Laramie, Wyoming). The data logger was activated and the slug was quickly submerged in the well, causing the water level to rise and then slowly fall as the water flows into the formation. To perform a rising head test once static conditions had been attained, the data logger was reprogrammed and the slug was removed from the well.

The raw data were downloaded from the data logger to a computer and analyzed using AQTESOLV®, a multi-solution computer program developed by Geraghty & Miller

(1991). The slug tests were analyzed using a method developed by Bouwer and Rice (1976). The raw data collected during the test are presented in Appendix B.

2.3 PIEZOMETER INSTALLATION

Seven piezometers were installed at locations across the site. The original work plan called for installation of three 2-inch piezometers near three existing monitoring wells. The piezometers were installed in the fill layer above the peat to evaluate groundwater elevations in the fill. However, in order to observe variations in both the shallow and deep groundwater flow across the site, two additional piezometer clusters were installed. These clusters were installed on the south side and on the east side of the site.

The piezometers were advanced with 4-inch ID hollow stem augers (producing a nominal 8-inch borehole). Split-spoon sampling was performed at various depths to provide stratigraphic data by driving 2-inch OD split spoons using a 140-pound hammer dropped 30 inches. The piezometers were completed using 2-inch, flush-threaded, schedule 40 PVC screen. A filter pack of #2 sand was used in the annulus to two feet above the top of the screened interval, and a bentonite seal was used above the filter pack. The boring logs prepared during drilling are presented in Appendix C; the piezometer construction logs are presented in Appendix D.

2.4 HYDROPUNCH SAMPLING

Fifteen HydroPunch groundwater samples were collected at locations across the site for analysis of volatile organics. Of these samples, nine were collected from the sand layer below the peat. The other six samples were collected in the fill layer above the peat.

A HydroPunch sampler has a stainless steel-and-teflon casing and point shielding a polypropylene screen. Each boring was advanced to the desired depth with a 4-inch hollow stem auger. Then, the bit was removed from the auger and the HydroPunch was connected to the rod drill casing. The sampler was then driven to the selected depth for sample collection and the outer stainless steel casing was withdrawn, allowing groundwater to flow into the sampler through the screen. A decontaminated 1-inch stainless steel bailer was placed inside the HydroPunch and lowered to the screened

interval to collect the groundwater. The bailer of groundwater was transferred to 40 ml vials for analysis of volatile organics. The samples were preserved, packed, and transferred to Accredited Laboratories under standard chain-of-custody protocols. Because of inadequate sample volumes, metals analysis was not proposed or collected. Volatiles were a prime concern because of their mobility, and no other indicators of shallow water had been done before.

The HydroPunch and bailer were decontaminated between each use with a high-pressure steam cleaner and a non-phosphate detergent wash, rinse, acetone wash, air dry, and final distilled water rinse. A new polypropylene screen and well point were used at each sampling location.

2.5 GROUNDWATER AND STREAM LEVEL MONITORING

In order to determine the gradient and direction of groundwater flow as well as possible tidal fluctuations beneath the Goody site, groundwater level measurements were recorded from five monitoring wells and two piezometers, using a digital data logger (Hermit Model SE-2000). Monitoring groundwater levels began on November 16, 1992 and continued for about 30 days. The data were transferred to a computer file to plot the groundwater elevations over time; these time-series plots are presented in Appendix E. These data were used specifically to evaluate tidal fluctuations.

The period of data collection was much longer than originally proposed because of flooding. Initially, the equipment could not be accessed, and then a decision was made to leave the equipment in place until the levels returned to pre-flood conditions so that the effects of a historic high water event on gradients (e.g. would the vertical gradient across the peat reverse, that is, could shallow water flow towards the sand unit) could be evaluated.

A round of manual groundwater level measurements was collected on December 4, 1992. Each measurement was obtained by slowly lowering a water level probe into the well (or piezometer) until the alarm sounded indicating contact with groundwater. The distance between the static water level and the top of the PVC well casing was recorded. These

groundwater level data were used in determining the gradient and direction of groundwater flow.

Stream levels of the Dead Horse Creek also were monitored for tidal fluctuations. Measurements were obtained from a measuring stick driven into the sediment of the stream bed. Monitoring began on November 16, 1992; however, before a sufficient amount of data could be collected, a storm in early December caused flooding throughout the region, including the site and prevented access to the stream for three weeks.

2.6 SOIL AND SEDIMENT SAMPLING

Soil was sampled from the test pits, the fill layer, the peat layer, and in background areas. Sediment was sampled from Dead Horse Creek on the western side of the site.

2.6.1 Test Pit Samples

Direct Environmental, Inc. of Newark, NJ mobilized a Case 580 Super K backhoe to the Goody site on November 9, 1992 to excavate 16 test pits at locations selected by WCC personnel where volatiles and metals contamination might be present above the NJDEPE proposed cleanup standards. Surficial soil samples collected from these test pits were submitted to Accredited Laboratories of Carteret, New Jersey for Target Compound List (TCL) volatile organic (VO) and base neutrals (BN) analytes, for Toxicity Characteristic Leaching Procedure (TCLP) VOs, BNs, and metals, and for selected RCRA characteristics (corrosivity, reactivity, flashpoint). These analyses were selected to provide additional information for selecting an appropriate soil remediation and/or disposal option.

Each test pit was excavated to the groundwater table or to a point of refusal; the total depths of the pits ranged from 1.67 to 4.5 feet. Samples were collected from the six-inch interval which appeared to be most contaminated (based on HNu readings or visual observations). The samples were transferred to sample containers using laboratory decontaminated stainless steel spoons. The volatile organic container was filled first; then the containers for analyses of base neutrals, TCLP, and RCRA characteristics were

filled in that order. Each test pit was described in the field notes presented in Appendix E.

2.6.2 Fill Samples

Subsurface soil samples were collected from four borings advanced in the western yard of the site to evaluate the vertical extent of soil contamination. Boring logs for these sample locations are presented in Appendix C.

The fill samples were collected using split-spoon samplers driven continuously from 2 feet below ground surface to the top of the peat layer (about 8 feet below ground surface). The samples were composited over the entire interval because the soil recovery in the split spoons was not sufficient to satisfy the volume requirements of the analytical parameters. The samples were analyzed for TCL VOs and BNs.

2.6.3 Peat Samples

Subsurface soil samples were also collected in the peat layer (between the fill and sand layers) from eight borings located throughout the site to determine whether the peat had absorbed contamination from the overlying soil and/or groundwater. The samples were collected using a two foot split spoon sampler driven continuously to the peat layer.

The samples were analyzed by Accredited Labs for VOs and BNs, for TCLP VOs, BNs, and metals, and for pH, reactivity, corrosivity, and flashpoint.

2.6.4 Background Soil Samples

Background soil samples were collected at 5 locations on December 22, 1992, for laboratory analyses. These locations were along the east and south sides of the site where no activities related to Goody's operations occur. Each sample was collected from a shallow test pit which was excavated manually (using a jackhammer to break the asphalt cover); shovels were used to remove the soil to a depth of two feet. The sample was collected using a decontaminated spoon and placed into laboratory sample containers. The samples were preserved, packed, and transferred to Accredited

Laboratories under standard chain-of-custody protocols for analyses of VOs, BNs, metals, and cyanide.

2.6.5 Sediment Samples

Creek bed sediment samples were collected at three locations in Dead Horse Creek to evaluate potential contamination to the creek. The sediment samples were collected from the bottom of the creek using a hand auger. The samples from the location furthest downstream were collected first so that suspended sediment from upstream locations would not cross-contaminate the downstream samples.

The samples were analyzed by Accredited Labs for VOs and BNs for TCLP VOs, BNs, and metals, and for reactivity, corrosivity, pH and flashpoint. The samples were resubmitted for analysis of Target Analyte List (TAL) metals after the first set of analytical results were reviewed. The results of these analyses are presented in Section 3.

3.0
DISCUSSION OF RESULTS

3.1 WELL SAMPLING

The results of the WCC groundwater samples collected on October 26 and 27, 1992 were basically consistent with the Converse groundwater samples collected on October 19, 1988. In general, the total concentrations of the volatile organics decreased from 1988 to 1992 whereas the total metals concentrations were above the previous results. The results of the WCC groundwater sampling event are summarized on Table 3-1 and on Figure 3-1.

Results of the WCC groundwater sampling event showed the highest levels of contaminants in the two upgradient wells MW-6 and MW-7, near the north boundary of the site adjacent to the railroad right of way. These samples contained benzene, chlorobenzene, and 1,4-dichlorobenzene above the NJDEPE proposed cleanup standards. Sample MW-7 and the associated duplicate also contained methylene chloride (11J, estimated but below detection limits) although this contaminant may be a laboratory artifact resulting from a higher dilution factor. The concentrations of 1,2-dichlorobenzene and 1,4-dichlorobenzene decreased from the levels that were reported by Converse in 1988. These concentrations, as reported in recent sampling event, are currently below the proposed cleanup standards.

In the five wells located in the western yard, the contaminant concentrations generally decreased. However, the concentrations of some degradation products of trichloroethene increased. These degradation products include cis-1,2-dichloroethane, trans-1,2-dichloroethene, and vinyl chloride. Vinyl chloride was detected in MW-1 (55 ppb) and MW-2 (13 ppb) above the proposed cleanup standards. Well MW-2 also contained trichloroethene (72 ppb) and cis-1,2-dichloroethene (55 ppb) above the proposed cleanup standards. Trans-1,2-dichloroethene (15 ppb) was also detected in well MW-2, although the concentrations did not exceed the proposed cleanup standard. Well MW-4 also contained concentrations of trichloroethene (40 ppb) and cis-1,2-dichloroethene (44 ppb) above the proposed cleanup standard.

TABLE 3-1

WCC GROUNDWATER SAMPLING RESULTS SUMMARY
GOODY PRODUCTS
KEARNY, NEW JERSEY
92C4246

Class II-A groundwater	PROPOSED STANDARD	MW-1 ug/l	MW-2 ug/l	MW-3 ug/l	MW-4 ug/l	MW-5 ug/l	MW-6 ug/l	MW-7 ug/l	DUP (MW-7) ug/l	FIELD BLANK ug/l	TRIP BLANK ug/l
Volatile Organics											
vinyl chloride	2	55	13	ND	ND	ND	ND	ND	ND	ND	ND
methylene chloride	3	ND	ND	ND	ND	ND	ND	11 J	11 J	5	6
trans-1,2-dichloroethene	100	ND	15	ND	ND	ND	ND	ND	ND	ND	ND
trichloroethene	1	ND	72	ND	40	ND	ND	ND	ND	ND	ND
benzene	1	ND	ND	7	ND	ND	53	24 J	30	ND	ND
toluene	1000	ND	ND	ND	ND	ND	ND	48	33	ND	ND
chlorobenzene	5	ND	ND	ND	ND	ND	1269	1524	1797	ND	ND
ethylbenzene	700	ND	ND	ND	ND	ND	ND	10 J	9 J	ND	ND
m,p-xylene	40 (total)	ND	ND	ND	ND	ND	ND	31	24 J	ND	ND
o-xylene	40 (total)	ND	ND	ND	ND	ND	ND	8 J	ND	ND	ND
cis-1,2-dichloroethene	10	ND	55	2 J	44	ND	ND	ND	ND	ND	ND
Volatile Organic TICs											
d-limonene		ND	ND	ND	ND	32	ND	ND	ND	ND	ND
unknown hydrocarbon		ND	ND	ND	ND	6	ND	ND	ND	ND	ND
Base Neutrals											
1,2-dichlorobenzene	600	ND	ND	ND	ND	ND	2 J	54	57	ND	NA
1,3-dichlorobenzene	600	ND	ND	2 J	ND	ND	18	434	386	ND	NA
1,4-dichlorobenzene	70	ND	ND	ND	ND	ND	19	585	550	ND	NA
acenaphthene	400	ND	ND	ND	ND	ND	13	ND	ND	ND	NA
di-n-butylphthalate	900	ND	4 J	ND	ND	ND	ND	ND	ND	ND	NA
bis(2-ethylhexyl)phthalate	30	ND	ND	4 J	ND	ND	2 J	ND	ND	ND	NA
Base Neutral TICs											
aldol condensate		6	7	31	27	52	ND	54	ND	38	NA
unknown hydrocarbon		1603	1003	380	516	303	339	314	422	13	NA

Notes: ND - Not Detected
NA - Not Analyzed
J - Estimated Value: detected below the method detection limit
Shaded cells indicate exceedances of the NJDEPE proposed standards for groundwater

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TABLE 3-1

WCC GROUNDWATER SAMPLING RESULTS SUMMARY
GOODY PRODUCTS
KEARNY, NEW JERSEY
92C4246

Class II-A groundwater	PROPOSED STANDARD	MW-1 ug/l	MW-2 ug/l	MW-3 ug/l	MW-4 ug/l	MW-5 ug/l	MW-6 ug/l	MW-7 ug/l	DUP (MW-7) ug/l	FIELD BLANK ug/l
Inorganics										
Aluminum	--	5410	ND	ND	ND	ND	436	21500	9120	ND
Arsenic	8	6 B	5 B	44.7	59.7	49.7	106	121	77.4	ND
Barium	2000	41.1	71.2	52.3	7 B	33.8	394	298	176	ND
Calcium	--	165000	177000	90000	145000	83800	47200	61800	55900	ND
Chromium	100	38.6	ND	ND	ND	ND	ND	431	105	ND
Cobalt	--	ND	ND	ND	ND	ND	ND	16.1 B	ND	ND
Copper	--	ND	ND	ND	ND	ND	ND	39.5	5.8 B	7 B
Iron	--	352000	151000	129000	177000	134000	43900	162000	94000	83.9 B
Lead	10	8 B	ND	ND	ND	ND	5 B	145	35	ND
Magnesium	--	182000	130000	90000	148000	91000	45100	70200	62000	ND
Manganese	--	3790	1810	1760	2010	3050	787	2360	1310	ND
Mercury	2	ND	ND	0.23 B	ND	ND	0.20 B	0.56	0.27 B	0.23 B
Nickel	100	ND	ND	ND	ND	ND	ND	475	100	ND
Potassium	--	18800	19700	6100	9600	4630	12800	11800	11000	ND
Silver	20	150	66.8	48.2	59	58.5	20 B	65.9	39.4	ND
Sodium	--	3480000	1210000	1050000	1880000	1020000	213000	510000	ND	ND
Vanadium	--	ND	ND	ND	ND	ND	ND	124	25.3 B	ND
Zinc	5000	69.4 B	20.2 B	20.4 B	20.7 B	31 B	145	208	61.2 B	28.4 B
Cyanide	200	ND	ND	ND	ND	ND	ND	ND	ND	ND

Notes: ND - Not Detected
B - Compound also detected in the blank sample
Shaded cells indicate exceedances of the NJDEPE proposed standards for groundwater

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The only compound detected above proposed cleanup standards in MW-3 was benzene (7 ppb). No compounds were reported above the detection limits in MW-5. The compounds detected in MW-5 during the Converse groundwater sampling event were reported at low concentrations and may be the result of either the sampling or decontamination process. Other possible explanations may be the contaminants were flushed from the well during tidal cycles.

The groundwater samples collected by Converse showed four samples exceeded the NJDEPE proposed cleanup standard for chromium. These samples included MW-1 (540 ppm), MW-2 (450 ppm), MW-4 (600 ppm), and MW-5 (400 ppm). No other samples were detected above the method detection limit.

Chromium was detected above the proposed standard in one well during the WCC groundwater sampling event. However, this well (MW-7, 431 ppm) was not one which contained chromium during the Converse sampling event. Other metals detected during the WCC investigation which were above proposed cleanup standards in MW-7 include lead (145 ppm), nickel (478 ppm), arsenic (121 ppm) and silver (65.9 ppm). Of these metals, only arsenic and silver were detected above the proposed standards in the other on-site wells. Arsenic was detected above the standard in MW-3 (44.7 ppm), MW-4 (59.7 ppm), MW-5 (49.7 ppm), and MW-6 (106 ppm). Silver was detected above the standard in MW-1 (150 ppm), MW-2 (66.8 ppm), MW-3 (48.2 ppm), MW-4 (69 ppm), and MW-5 (58.5 ppm).

Results of the groundwater sampling of the five piezometers (Table 3-2) showed metal contamination of arsenic, cadmium, chromium, lead, mercury, nickel and silver in concentrations exceeding NJDEPE proposed cleanup standards for groundwater. Lead was above the standard (10 ppb) in the five samples with concentrations ranging from 49 ppb in PZ-3 to 2,030 ppb in PZ-5S. Chromium was detected above the 100 ppb standard in 3 of the 5 samples with concentrations of 798, 226, and 237 ppb in PZ-1, PZ-2, and PZ-4S, respectively. Mercury was detected above the 2 ppb standard in 4 of the 5 samples with concentrations of 116, 7.9, 66.4, and 3.2 ppb in PZ-1, PZ-2, PZ-4S, and PZ-5S respectively. Arsenic was detected in PZ-1 (20 ppb), PZ-2 (16 ppb) and PZ-4S (57.5 ppb), above the standard of 8 ppb. Nickel was detected above the 100 ppb standard in sample PZ-2 (136 ppb) only. Both cadmium and silver were detected above

TABLE 3-2

WCC GROUNDWATER SAMPLING RESULTS SUMMARY
COLLECTED FROM SHALLOW PIEZOMETERS
GOODY PRODUCTS
KEARNY, NEW JERSEY
92C4246

Class II-A groundwater	PROPOSED STANDARD	PZ-1 ug/l	PZ-2 ug/l	PZ-3 ug/l	PZ-4S ug/l	PZ-5S ug/l
Inorganics						
Aluminum	--	11200	19100	1840	30600	24100
Arsenic	8	20	16	4.0 B	57.5	7.2 B
Barium	2000	1240	587	147	1320	1670
Beryllium	20	ND	ND	ND	1.9 B	1.6 B
Cadmium	4	ND	ND	ND	6.5 B	5.8 B
Calcium	--	605000	161000	40600	356000	694000
Chromium	100	798	226	99	237	77.8
Cobalt	--	34.8	ND	ND	30.8	41.9
Copper	--	151	112	39.4	160	68.7
Iron	--	31900	33600	4760	35000	28100
Lead	10	404	493	49	732	2030
Magnesium	--	63500	50800	11000	32200	67900
Manganese	--	3360	1780	2060	4020	5590
Mercury	2	116	7.9	1.5	66.4	3.2
Nickel	100	49.4	136	93.3	57.3	32.8 B
Potassium	--	23000	29900	46500	27700	29600
Silver	20	22.7 B	19.2 B	ND	23.0 B	17.9 B
Sodium	--	ND	163000	274000	ND	140000
Vanadium	--	30.7 B	54.6	38.3 B	91.2	49.1 B
Zinc	5000	500	528	136	551	1120
Cyanide	200	ND	ND	ND	ND	10

Notes: ND - Not Detected
B - Compound also detected in the blank sample
Shaded cells indicate exceedances of the NJDEPE proposed standards for groundwater
A volatile organics sample was collected from PZ-2 and PZ-3.
The volatile organic results show one unknown at 16 ppb and 15 ppb, respectively

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the proposed standard in two samples each. However, these concentrations were flagged with a "B", indicating contamination was also detected in the associated method blank.

The volatile organic analyses of samples PZ-2 and PZ-3 did not show any concentrations of compounds above the method detection limits. However, an unknown tentatively identified compound was detected in both samples at concentrations of 16 and 15 ppb, respectively.

The metal contamination detected in these samples may be the result of the high turbidity of the samples. Evaluation of these results should also consider the piezometers were not sampled according to NJDEPE protocol. In order to obtain a more accurate evaluation of the groundwater in the fill, monitoring wells should be installed and both filtered and unfiltered groundwater samples should be sampled after the wells have been properly developed.

3.2 AQUIFER CHARACTERISTICS

3.2.1 Groundwater Flow Direction

Table 3-3 presents the groundwater level measurements for the on-site monitoring wells and piezometers. Measurements were collected on five occasions to monitor possible variations in the groundwater flow direction. From this data, representative groundwater contour maps were constructed to show the groundwater flow direction.

Figures 3-2 and 3-3 depict the groundwater contours for the shallow and deep aquifers as constructed from water level information collected on December 4, 1992. These contours illustrate the groundwater in the shallow, unconfined aquifer flows approximately from the south to the north and groundwater in the deep, semi-confined aquifer flows for the south-southeast to the north-northwest.

TABLE 3-3

WCC GROUNDWATER ELEVATIONS SUMMARY

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY
92C4246

WELL	MEASURE POINT ELEVATION	DEPTH TO WATER 10/26/92	GROUNDWATER ELEVATION 10/26/92	DEPTH TO WATER 10/27/92	GROUNDWATER ELEVATION 10/26/92	DEPTH TO WATER 11/16/92	GROUNDWATER ELEVATION 11/16/92	DEPTH TO WATER 11/24/92	GROUNDWATER ELEVATION 11/24/92	DEPTH TO WATER 12/4/92	GROUNDWATER ELEVATION 12/4/92
MW-1	6.37	4.24	2.13	4.42	1.95	4.46	1.91	4.03	2.34	4.22	2.15
MW-2	7.38	5.31	2.07	5.17	2.21	5.22	2.16	4.78	2.60	4.94	2.44
MW-3	8.00	5.83	2.17	5.83	2.17	5.88	2.12	5.44	2.56	5.58	2.42
MW-4	6.11	4.00	2.11	4.08	2.03	4.08	2.03	3.67	2.44	3.84	2.27
MW-5	4.84	2.71	2.13	2.71	2.13	2.75	2.09	2.33	2.51	2.49	2.35
MW-6	3.92	NM	NM	1.79	2.13	1.79	2.13	1.14	2.78	1.32	2.60
MW-7	7.48	5.32	2.16	5.31	2.17	5.32	2.16	4.83	2.65	5.00	2.48
PZ-1	5.98	NM	NM	NM	NM	NM	NM	2.24	3.74	2.44	3.54
PZ-2	5.56	NM	NM	NM	NM	NM	NM	2.38	3.18	2.65	2.91
PZ-3	5.62	NM	NM	NM	NM	NM	NM	2.58	3.04	2.37	3.25
PZ-4S	5.88	NM	NM	NM	NM	NM	NM	2.71	3.17	1.92	3.96
PZ-4D	6.14	NM	NM	NM	NM	NM	NM	2.22	3.92	2.34	3.80
PZ-5S	7.05	NM	NM	NM	NM	NM	NM	2.71	4.34	3.12	3.93
PZ-5D	7.10	NM	NM	NM	NM	NM	NM	3.81	3.29	3.87	3.23

NOTES: NM - Not measured

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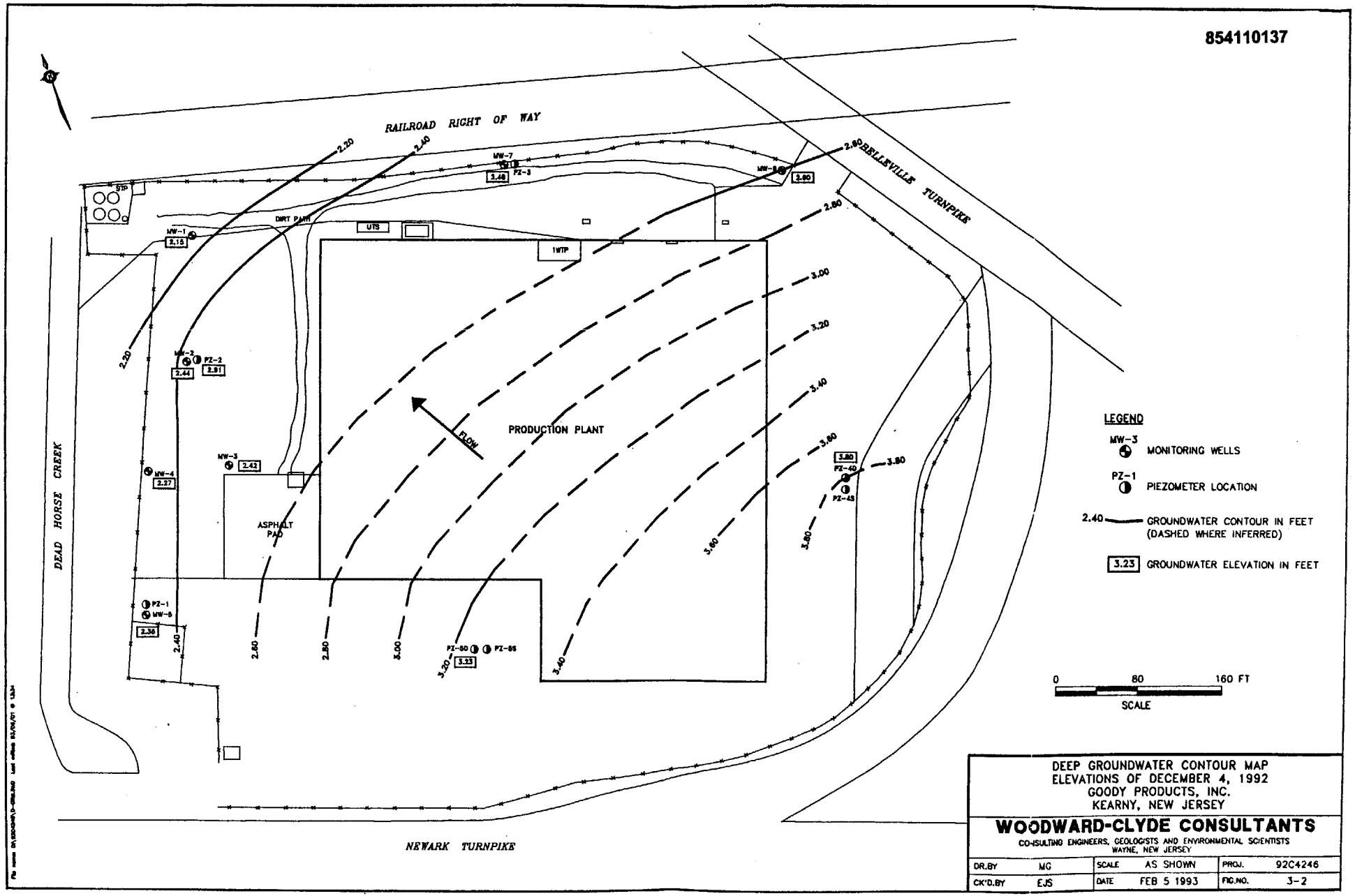

DEEP GROUNDWATER CONTOUR MAP
ELEVATIONS OF DECEMBER 4, 1992
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

WOODWARD-CLYDE CONSULTANTS

CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS
WAYNE, NEW JERSEY

DR.BY	MG	SCALE	AS SHOWN	PROJ.	92C4246
CK'D.BY	EJS	DATE	FEB 5 1993	FIG.NO.	3-2

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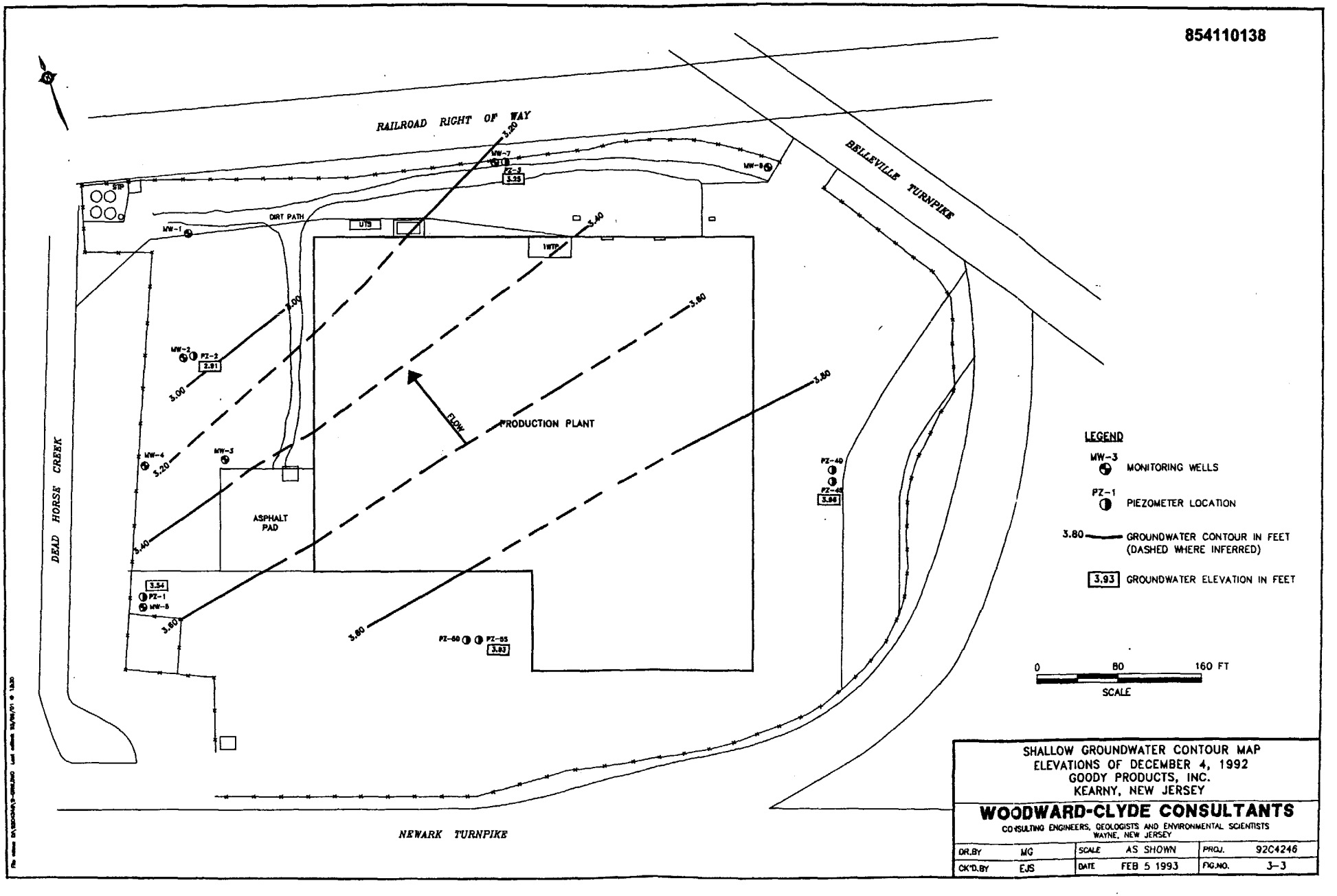

SHALLOW GROUNDWATER CONTOUR MAP
ELEVATIONS OF DECEMBER 4, 1992
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

WOODWARD-CLYDE CONSULTANTS
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WAYNE, NEW JERSEY

DR.BY	MG	SCALE	AS SHOWN	PROJ.	92C4246
CK'D.BY	EJS	DATE	FEB 5 1993	FIG.NO.	3-3

3.2.2 Hydraulic Conductivities

Slug tests were performed on seven monitoring wells that are screened in the deep, semi-confined aquifer. Table 3-4 summarizes the results of these tests. Raw data printouts and semi-log time versus displacement plots are included in Appendix B.

The results of these tests indicate that the hydraulic conductivities are fairly uniform. The hydraulic conductivity values calculated from slug tests performed on the deep wells averaged approximately 5.2×10^{-3} cm/sec.

Upon review of the geologic logs, it appears that the calculated hydraulic conductivity values are within the expected range for the lithologies that were encountered.

3.2.3 Slug Tests

Two types of slug tests were performed: falling head and rising head. Although both tests were performed on the seven wells, not all of the tests were analyzed. The rising head test for monitoring well MW-1 was not analyzed because the water level in the well did not recover to pre-test conditions upon completion of the falling head test. Both tests for monitoring well MW-2 and the falling head test for monitoring well MW-5 were not analyzed because the test data could not be reduced to conform with the requirements of the Bouwer and Rice analysis (1976).

3.2.4 Horizontal Hydraulic Gradients

Horizontal hydraulic gradients for the shallow, unconfined aquifer and the deep, semi-confined aquifer were calculated using the water level information collected on December 4, 1992. The groundwater contour maps (Figures 3-2 and 3-3) depict the gradients throughout the site. A summary of the gradients is presented on Table 3-5. As presented in Figure 3-2, the shallow aquifer gradients are uniform throughout the entire site (ranging from 0.0017 to 0.0027 ft/ft). The deep, semi-confined aquifer gradients were also fairly uniform (ranging from 0.0023 to 0.0042 ft/ft) throughout the site.

TABLE 3-4

WCC Hydraulic Conductivity Values Summary
Goody Products, Inc.
Kearny, New Jersey

Well I.D.	Type Test	Hydraulic Conductivity(cm/sec)
MW-1	Falling Head	6E-04
MW-3	Falling Head	1E-04
MW-3	Rising Head	5E-04
MW-4	Falling Head	5E-03
MW-4	Rising Head	3E-03
MW-5	Rising Head	1E-03
MW-6	Falling Head	5E-03
MW-6	Rising Head	5E-03
MW-7	Falling Head	2E-03
MW-7	Rising Head	5E-03

TABLE 3-5

WCC Horizontal Hydraulic Gradients Summary
Elevations of December 4, 1992
Goody Products, Inc.
Kearny, New Jersey

Well I.D.	Distance Between Wells(ft)	Elevation of Water Table(ft)	Approximate Horizontal Hydraulic Gradient Between Wells
PZ-4S		3.96	
	430		0.0017
PZ-3		3.25	
PZ-5S		3.93	
	375		0.0027
PZ-2		2.91	
PZ-4D		3.80	
	285		0.0042
MW-6		2.60	
PZ-4D		3.80	
	430		0.0031
MW-7		2.48	
PZ-5D		3.23	
	310		0.0028
MW-5		2.35	
PZ-5D		3.23	
	465		0.0023
MW-1		2.15	

3.2.5 Groundwater Flow Velocities

Groundwater flow velocities were calculated for the deep, semi-confined aquifer. Flow velocities for the shallow aquifer were not calculated due to the heterogenous nature of the fill material. In addition, slug testing was performed on the deep wells only.

Flow velocities were calculated using hydraulic conductivity values obtained from slug tests (Section 3.2.2). A porosity value of 35 percent (Fetter, 1980) was used in the calculations to reflect the average grain size encountered in the deep aquifer.

Table 3-6 summarizes the flow velocity results. Flow velocity values ranged from 3.9×10^{-6} cm/sec to 3.0×10^{-5} cm/sec with average flow velocity of 1.2×10^{-5} cm/sec.

3.2.6 Groundwater Level Measurements

Approximately 30 days of continuous background groundwater level measurements were collected from five wells and two piezometers starting on November 16, 1992. Time versus groundwater elevation graphs for each monitoring point are presented in Appendix E. Also provided in Appendix E is the initial three-day monitoring period for all monitoring points.

The long-term monitoring graphs show that the wells monitored are tidally influenced. The tidal effects on the wells resulted in an elevation change of zero feet (MW-1) to four feet (MW-2). The long-term monitoring graphs also show the effects of the major northeastern storm which occurred in December 1992. At approximately 35,000 minutes, the effects of the storm can be observed; disrupting the symmetry of the tidal fluctuations. The three-day monitoring graph shows that one full tidal cycle lasts approximately 24 hours.

3.3 HYDROPUNCH SAMPLING

The results of the HydroPunch sampling at the site (Table 3-7 and Figure 3-4) shows volatile organic contamination is more prevalent in the sand layer than in the fill layer. Of the 15 HydroPunch samples collected, six were collected in the fill layer and the

TABLE 3-6

WCC Flow Velocity Calculations Summary
Goody Products, Inc.
Kearny, New Jersey

Well I.D.	Average Hydraulic Conductivity(cm/sec)	Horizontal Hydraulic Gradient Between Wells	Flow Velocity(cm/sec)
PZ-4D MW-6	5E-04	0.0042	6E-06
PZ-4D MW-7	3E-03	0.0031	3E-05
PZ-5D MW-5	1E-03	0.0028	1E-05
PZ-5D MW-1	6E-04	0.0023	4E-06

TABLE 3-7

WCC HYDROPUNCH GROUNDWATER SAMPLING RESULTS SUMMARY
GOODY PRODUCTS
KEARNY, NEW JERSEY
92C4246

Class II-A groundwater	PROPOSED STANDARD	PZ-1 ug/l	PZ-3 ug/l	PZ-4D ug/l	HP-1 ug/l	HP-2S ug/l	HP-2D ug/l	HP-3D ug/l	HP-4D ug/l
Volatile Organics									
vinyl chloride	2	ND	ND	ND	ND	ND	81	ND	ND
methylene chloride	3	ND	2 J	5	2 J	ND	ND	ND	ND
trans-1,2-dichloroethene	100	ND	ND	ND	ND	ND	39	ND	ND
trichloroethene	1	ND	ND	ND	ND	ND	5 J	12	ND
2-butanone	300	ND	ND	5 J	ND	ND	ND	6 J	ND
benzene	1	2 J	ND	1 J	ND	ND	4 J	ND	ND
4-methyl-2-pentanone	400	ND	ND	2 J	ND	ND	ND	ND	ND
toluene	1000	5 J	2 J	5	2 J	ND	ND	ND	ND
ethylbenzene	700	ND	2 J	3 J	1 J	ND	ND	ND	ND
m,p-xylene	40 (total)	ND	6	4 J	5	ND	ND	1 J	2 J
o-xylene	40 (total)	ND	3 J	ND	3 J	ND	ND	ND	ND
cis-1,2-dichloroethene	10	ND	ND	ND	ND	ND	74	13	ND
Volatile Organic TICs									
d-limonene		750	ND	ND	ND	ND	ND	ND	ND
unknown hydrocarbon		6	146	26	150	16	360	ND	6
unknown aromatic		24	13	ND	5	ND	ND	ND	ND
1,4-cyclohexadiene, 1-methyl-4-(1-methylethyl)		13	ND	ND	ND	ND	ND	ND	ND
unknown		7	ND	5	ND	6	ND	ND	ND
cyclohexanone, 5-methyl-2-1(		13	ND	ND	ND	ND	ND	ND	ND
cyclohexene, 1-methyl-4-(1-m		14	ND	ND	ND	ND	ND	ND	ND
silane, methoxytrimethyl-		ND	11	ND	12	ND	ND	ND	ND
silanol, trimethyl- (8CI9CI)		ND	120	ND	120	ND	ND	ND	ND
disilxane, 1-ethenyl-1,1,3,3-tetramethyl-3-3)2-propenyl)		ND	11	ND	ND	ND	ND	ND	ND
bicyclo[3.1.1]hept-2-ene, 3,6,6-trimethyl-		ND	ND	ND	ND	ND	ND	ND	21
hexanal (8CI9CI)		ND	ND	10	ND	ND	ND	ND	ND

NOTES: ND - Not Detected
J - Estimated Value; detected below the method dection limit
Shaded cells indicate exceedances of theproposed NJDEPE groundwater cleanup standards

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TABLE 3-7

WCC HYDROPUNCH GROUNDWATER SAMPLING RESULTS SUMMARY
GOODY PRODUCTS
KEARNY, NEW JERSEY
92C4246

Class II-A groundwater	PROPOSED STANDARD	HP-5D ug/l	HP-6 ug/l	HP-7D ug/l	HP-8S ug/l	HP-8D ug/l	HP-9D ug/l	HP-10D ug/l	FIELD BLANK ug/l
Volatile Organics									
chloromethane	--	ND	ND	18	ND	ND	ND	ND	ND
methylene chloride	3	ND	ND	2 J	ND	1 J	ND	21 J	10
chloroform	6	ND	ND	ND	ND	ND	ND	ND	2 J
trans-1,2-dichloroethene	100	ND	ND	22	ND	ND	ND	ND	ND
trichloroethene	1	ND	ND	5	ND	ND	ND	ND	ND
2-butanone	300	ND	ND	9 J	ND	ND	ND	ND	ND
benzene	1	ND	ND	10	ND	38	7	ND	ND
2-hexanone	--	ND	ND	ND	ND	ND	5 J	ND	ND
toluene	1000	ND	ND	2 J	ND	ND	ND	24 J	ND
chlorobenzene	5	ND	4 J	327	ND	1255	141	ND	ND
ethylbenzene	700	ND	ND	2 J	ND	ND	ND	ND	ND
m,p-xylene	40 (total)	ND	1 J	12	ND	ND	ND	23 J	ND
o-xylene	40 (total)	ND	ND	2 J	ND	ND	ND	ND	ND
cis-1,2-dichloroethene	10	ND	ND	142	ND	ND	ND	ND	ND
Volatile Organic TICs									
unknown hydrocarbon		ND	ND	6	66	ND	ND	ND	24
unknown aromatic		ND	ND	6	ND	ND	16	ND	ND
2-propanol		ND	ND	ND	ND	ND	870	ND	ND
1,3,7-octatriene, 3,7-dimethyl		ND	ND	ND	ND	ND	14	ND	ND
furan, 2-methyl-		ND	ND	6	ND	ND	ND	ND	ND

NOTES: ND - Not Detected
J - Estimated Value; detected below the method dection limit
Shaded cells indicate exceedances of the proposed NJDEPE groundwater cleanup standards

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remaining nine from the sand layer. Of the six fill samples, only one sample PZ-1, contained a compound (benzene, 2J) above the NJDEPE. It should be noted the concentration was flagged with a "J", indicating an estimated value because the compound was detected but below the method detection limit.

The laboratory results of the HydroPunch samples collected from the sand layer show VO compounds similar to those detected during the well sampling event, although at lower concentrations. The compounds detected above the proposed standards in the sand layer include vinyl chloride, methylene chloride, trichloroethene, benzene, toluene, and cis-1,2-dichloroethene.

Vinyl chloride was detected above the proposed standards at 81 ppb in sample HP-2D. This sample is located near the northwest corner of the plant building. Methylene chloride was detected above the proposed standards in two samples, PZ-4D and HP-10D, at 0.5 ppb and 21J ppb, respectively. Both of these samples are located on the east side of the building where no sources of contamination are present.

Trichloroethene was detected in three samples, HP-2D, HP-3D, and HP-7D at 5J, 12, and 5 ppb, respectively. Cis-1,2-dichloroethene, a degradation product of TCE, was detected in the same three samples at 74, 13, and 142 ppb, respectively. The three samples are all located near the northwest corner of the building.

Benzene was detected above the proposed standards in four sand layer samples, HP-2D, HP-7D, HP-8D, and HP-9D at 4J, 10, 38, and 7 ppb, respectively. Toluene was detected above the proposed standards in three of these samples, HP-7D, HP-8D, and HP-9D at 327, 1255, and 141 ppb, respectively. These samples are located along the north side of the building with the longest sample number to the west and increasing to the right.

3.4 SOIL AND SEDIMENT SAMPLING

The soil and sediment sampling investigation was divided into separate tasks based on objective for the particular sample collection. A description of the results of each task is included in the following sections. Laboratory reports of the soil and groundwater sampling for this project is included in Appendix G.

3.4.1 Test Pit Samples

The volatile organic results of the samples collected from the 16 test pits (Table 3-8 and Figure 3-5) showed concentrations of xylene and ethylbenzene exceeded the NJDEPE proposed cleanup standards in sample GKW-1 only. The concentrations of m,p-xylene, o-xylene, and ethylbenzene in this sample were 1,041 ppm, 159 ppm, and 176 ppm, respectively.

No other volatile organic compounds were detected above the NJDEPE proposed standards. Other VO compounds detected in more than two samples include methylene chloride, chloroform, 2-butanone (MER), and bromodichloromethane. Methylene chloride was detected in 15 of the 16 samples with concentrations ranging from 0.020 J (GKW-6) to 0.117 ppm (GKW-7). Chloroform was detected in 13 samples with concentrations from 0.022 J (GKW-16) to 0.608 ppm (GKW-7). MEK was detected in 9 samples in concentrations from 0.0315 (GKW-13) to 2.917 ppm (GKW-1). Bromodichloromethane was detected in 10 samples with concentrations ranging from 0.010 J (GKW-15) to 0.092 ppm (GKW-8).

The base neutral analyses of these samples (Table 3-9 and Figure 3-6) showed six compounds whose proposed cleanup standard was exceeded. These compounds included benzo(a)anthracene (10 samples), chrysene (10 samples), benzo(k)fluoranthene (8 samples, benzo(a)pyrene (9 samples), indeno(1,2,3-cd)pyrene (2 samples), and benzo(g,h,i)perylene (3 samples). The sample locations that did not contain any base neutral compounds above the proposed standards include GKW-3, GKW-5, GKW-7, GKW-8, GKW-9, and GKW-10.

The results of the TCLP analyses (Table 3-10) showed no volatiles, base neutrals, pesticides, or herbicides above the regulatory limits. Only one compound, 2-butanone and 17 mg/L, was detected above method detection limits.

The results of the TCLP metals (Table 3-11) analyses showed two samples (GKW-4 and GKW-5) with lead concentrations above the regulatory limits. The lead concentrations of these samples were reported at 6.98 ppm and 7.25 ppm, respectively. No other metals were reported above the regulatory levels.

TABLE 3-8

WCC VOLATILE ORGANICS ANALYSIS OF SOIL RESULTS SUMMARY
GOODY PRODUCTS, INC., KEARNY, NEW JERSEY

Volatile Organics	NJDEPE PROPOSED CLEANUP STANDARD	LDR CONCENTRATIONS	GKW-1	GKW-2	GKW-3	GKW-4	GKW-5	GKW-6	GKW-7	GKW-8
date			11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92
depth			18 in.	12 in.	12 in.	25 in.	18 in.	12 in.	16 in.	16 in.
			ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
methylene chloride	10,000	33,000		84	21 J	39 J	49 J	59 J	117	110
chloroform	1,000			23 J		157	183	249	608	577
2-butanone	50,000	36,000	2917 J	51 J		107 J	100 J	85 J	105	
1,1,1-trichloroethane	50,000	5,600								
bromodichloromethane	1,000					14 J	17 J	22 J		92
trichloroethene	1,000	5,600								
benzene	1,000	3,700								
1,1,2,2-tetrachloroethane	1,000								63 J	
toluene	500,000	28,000								
4-methyl-2-pentanone	50,000			20 J						
ethylbenzene	100,000	6,000	175,538							
m,p-xylene	10,000	28,000	1,041,100	32 J		32 J		20 J	82	
o-xylene	10,000	28,000	158,747						55 J	
ethyl acetate		33,000								
TOTAL VOLATILES			1,378,302	210	21	349	349	435	1,030	779
VO TICs										
unknown							190			488
unknown hydrocarbon			30,100	242		170	110	160	2,740	1,380
unknown aromatic			13,000							750
benzene, 1-ethyl-2-methyl			7,300							
benzene, 2-ethyl-1,4-dimethyl			7,100							
cyclohexane, 1,3-dimethyl-,trans									70	
nonane, 3-methyl									640	
cyclotetrasiloxane, octamethyl									2,900	
octane, 3,6-dimethyl									540	
undecane										3,600
benzene, methyl(1-methylethyl)										390
benzene, 4-ethyl-1,2-dimethyl										
cyclohexane, 2-butyl-1,1,3-trimethyl										
TOTAL VO TICS			57500	242	0	170	300	160	6890	6608

NOTES: J - Estimated value; compound was detected below the method detection limit
Blank cells indicate the compound was not detected
Total values do not include samples with blank contamination
Shaded cells indicate exceedances of the NJDEPE proposed residential surface soil cleanup standards
Underlined cells indicate exceedances of the land disposal regulation concentrations

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TABLE 3-8

WCC VOLATILE ORGANICS ANALYSIS OF SOIL RESULTS SUMMARY
GOODY PRODUCTS, INC., KEARNY, NEW JERSEY

Volatile Organics	NJDEPE PROPOSED CLEANUP STANDARD	LDR CONCENTRATIONS	GKW-9	GKW-10	GKW-11	GKW-12	GKW-13	GKW-14	GKW-15	GKW-16
date			11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92
depth			17 in.	15 in.	18 in.	19 in.	20 in.	20 in.	11 in.	13 in.
			ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
methylene chloride	10,000	33,000	20 J	93	97	106	83	84	79	72
chloroform	1,000			360	408	528	117	117	77	22 J
2-butanone	50,000	36,000		66 J			31 J	47 J		
1,1,1-trichloroethane	50,000	5,600			41 J	40 J				
bromodichloromethane	1,000			62	73	89	14 J	24 J	10 J	
trichloroethene	1,000	5,600		17 J						
benzene	1,000	3,700		141						
1,1,2,2-tetrachloroethane	1,000						48 J			
toluene	500,000	28,000						25 J		
4-methyl-2-pentanone	50,000									
ethylbenzene	100,000	6,000		949					14 J	
m,p-xylene	10,000	28,000		4,112	23 J				17 J	
o-xylene	10,000	28,000		774						
ethyl acetate		33,000							2 J	
TOTAL VOLATILES			20	6,574	642	763	293	297	199	94
VO TICs										
unknown					380	84	213	360	420	
unknown hydrocarbon				145	572	242	360	970		
unknown aromatic					210	70	66	280		
benzene, 1-ethyl-2-methyl										
benzene, 2-ethyl-1,4-dimethyl					82					
cyclohexane, 1,3-dimethyl-,trans										
nonane, 3-methyl										
cyclotetrasiloxane, octamethyl										
octane, 3,6-dimethyl										
undecane										
benzene, methyl(1-methylethyl)										
benzene, 4-ethyl-1,2-dimethyl							140			
cyclohexane, 2-butyl-1,1,3-trimethyl								210		
TOTAL VO TICS			0	145	1244	396	779	1820	420	0

NOTES: J - Estimated value; compound was detected below the method detection limit
Blank cells indicate the compound was not detected
Total values do not include samples with blank contamination
Shaded cells indicate exceedances of the NJDEPE proposed residential surface soil cleanup standards
Underlined cells indicate exceedances of the land disposal regulation concentrations

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TABLE 3-9

BASE NEUTRAL ANALYSIS OF SOIL RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

Base Neutrals	NJDEPE PROPOSED CLEANUP STANDARD	GKW-1	GKW-2	GKW-3	GKW-4	GKW-5	GKW-6	GKW-7	GKW-8	GKW-9	GKW-10	GKW-11	GKW-12	GKW-13	GKW-14	GKW-15	GKW-16
date		11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92
depth		18 in.	12 in.	12 in.	25 in.	18 in.	12 in.	16 in.	16 in.	17 in.	15 in.	18 in.	19 in.	20 in.	20 in.	11 in.	13 in.
		ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
isophorone	10,000															48 J	
naphthalene	100,000	3,335	213 J		378 J		120 J			93 J		85 J			138 J		
2-methylnaphthalene	--											115 J		61 J	86 J		
acenaphthylene	--	127 J	435 J		83 J	43 J	146 J	59 J			60 J	215 J	94 J	99 J	300 J	67 J	130 J
acenaphthene	100,000	193 J	366 J		623		149 J		96 J	63 J		852	245 J	290 J	737	323 J	127 J
dibenzofuran	--	107 J	226 J		404 J		112 J					375 J	96 J	112 J	311 J	114 J	55 J
diethylphthalate	50,000	119 J															
fluorene	100,000	1,186	544		797		184 J		70 J	58 J		1,233	226 J	273 J	703	283 J	96 J
phenanthrene	--	1,832	4,299		4,364	480	1,968	101 J	804	402	421	15,173	2,260	2,403	4,650	3956	1227
anthracene	500,000	256 J	1,137		1,334	100 J	486	101 J	198 J	83 J	134 J	2,782	613	840	1,899	1144	304 J
di-n-butylphthalate	100,000	78 B	50 B	979 B	52 B	202 J	206 B		481 B	790 B	1327 B	926	932 B	1130 B	1,820		
fluoranthene	500,000	723	5,234	69 J	4,341	818	1,597		407 J	401	911	4,846	2,717	2,919	5,290	5369	1957
pyrene	500,000	2,512	10,226	75 J	5,503	683	2,783		540	794	1,373	11,767	4,208	5,623	12,211	7280	2410
butylbenzylphthalate	100,000	186 B		536 B										112 B			
benzo(a)anthracene	660	737	3,820		2,569	453	1,383		477	201 J	624	6,025	1,619	2,684	7,206	2695	1056
bis(2-ethylhexyl)phthalate	49,000	447 B	94 B	806 B		121 J	147 B	349 B	71 B	771 B	174 B		100 B	1479 B	166 J	87 J	
chrysene	660	865	4,291		2,444	461	1,206		464	256 J	557	4,912	1,562	2,217	5,421	2401	1096
benzo(b)fluoranthene	--	1,155	4,923	100 J	2,498	642	1,747		706	407	1,041	5,938	2,142	3,996	7,481	2017	1032
benzo(k)fluoranthene	660	617	4,655	51 J	3,414	231 J	452		185 J	95 J	327 J	2,649	854	974	4,430	2454	1740
benzo(a)pyrene	660	889	5,792	82 J	2,994	472	1,246		390 J		540	4,595	1,423	2,337	6,861	2258	1400
indeno(1,2,3-cd)pyrene	660					247 J	466					1,186		638	2,350	111 J	
dibenzo(a,h)anthracene	660				308 J										610	319 J	
benzo(g,h,i)perylene	660	455	1,446		611	222 J	413 J					1,018			2,096	580	472
TOTAL BASE NEUTRALS		15,108	47,607	377	32,665	5,175	14,458	261	4,337	2,853	5,988	64,692	18,059	25,466	64,768	31,506	13,104

NOTES: J - Estimated value; compound was detected below the method detection limit
B - Compound also detected in the blank sample
A blank cell indicates the compound was not detected
Shaded cells indicate exceedances of the NJDEPE proposed residential surface soil cleanup standards

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TABLE 3-9

BASE NEUTRAL ANALYSIS OF SOIL RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

BN TICs	NJDEPE PROPOSED CLEANUP STANDARD	GKW-1	GKW-2	GKW-3	GKW-4	GKW-5	GKW-6	GKW-7	GKW-8	GKW-9	GKW-10	GKW-11	GKW-12	GKW-13	GKW-14	GKW-15	GKW-16
date		11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92
depth		18 in.	12 in.	12 in.	25 in.	18 in.	12 in.	16 in.	16 in.	17 in.	15 in.	18 in.	19 in.	20 in.	20 in.	11 in.	13 in.
		ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
unknown				180		590	490		270	410	1,420		400			4300	6000
unknown hydrocarbon		10,900	2,700	3,390	1,580	5,030	12,000	19,170	10,650	6,160	3,810	2,700	1,500	2,700	5,600	300	980
unknown PAH			1,500		2,100		1,570			840		2,910	2,150	3,340	4,060	3390	1830
unknown aromatic		53,300															
benzene, (1-methylethyl)		3,300															
benzene, 1,2,3-trimethyl		2,900															
benzene, 1-methyl-3-(1-methyl)		4,100															
benzene, 1,2,3,4-tetramethyl		1,000															
benzene, 2,4-dimethyl-1-(1-m		730															
benzene, 1,2-dimethyl			1,000														
nonane, 2-methyl		3,400															
dodecane		720															
phenol, 2,6-bis(1,1-dimethyl)		4,500															
anthracene, 1-methyl			280		170											450	
anthracene, 2-methyl												450			810	190	
phenanthrene, 4-methyl			280									420		390	970		
phenanthrene, 2,3-dimethyl														340			
phenanthrene, 2,5-dimethyl			230									300			730		
phenanthrene, 4,5-dimethyl												180					
11H-benzo[a]fluorene			400														
11H-benzo[b]fluorene			420		290							660			290		
pyrene, 1-methyl			550														
pyrene, 2-methyl																270	
aldol condensate				470		1,100	1,300		1,100	690	720						1300
cyclohexadecane				530													
phosphonic acid, dioctadecyl				480													
octatetracontane, 1-iodo				250													
benzo[b]naphto[2,1-d]thioph					410												
benzo[b]naphto[2,3-d]furan																230	
1-heneicosyl formate											400						
9, 10-anthracenedione													350				
benzo[e]pyrene													470		1,200	880	1000
1H-indene, 1-phenyl														430			
TOTAL BN TICs		84,850	7,360	5,300	4,550	6,720	15,360	19,170	12,020	8,100	6,350	7,620	4,870	7,200	13,660	10,010	11,110

NOTES: J - Estimated value; compound was detected below the method detection limit
B - Compound also detected in the blank sample
A blank cell indicates the compound was not detected

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TABLE 3-10

WCC TCLP ORGANICS ANALYSIS RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

92C4246

	Reg Level	GKW-1	GKW-2	GKW-3	GKW-4	GKW-5	GKW-6	GKW-7	GKW-8	GKW-9	GKW-10	GKW-11	GKW-12	GKW-13	GKW-14
date		11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92
depth		18 in.	12 in.	12 in.	25 in.	18 in.	12 in.	16 in.	16 in.	17 in.	15 in.	18 in.	19 in.	20 in.	20 in.
	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
TCLP Volatiles															
benzene	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
2-butanone	200	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	17	<.10
carbon tetrachloride	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
chlorobenzene	100	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
chloroform	6	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
1,1-dichloroethene	0.7	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
1,2-dichloroethane	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
tetrachloroethene	0.7	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
trichloroethene	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
vinyl chloride	0.2	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10
TCLP Base Neutrals		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
TCLP Herbicides		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
TCLP Pesticides		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

NOTES: B - Compound also detected in the blank sample
ND - Not detected

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TABLE 3-10

WCC TCLP ORGANICS ANALYSIS RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

92C4246

	Reg Level	GKW-15	GKW-16	B1-F	B1-P	B2-F	B2-P	B3-F	B3-P	PZ-5F	PZ-5P	SED-1	SED-2	SED-3
date		11/10/92	11/10/92	11/13/92	11/13/92	11/13/92	11/13/92	11/13/92	11/13/92	11/12/92	11/12/92	11/16/92	11/16/92	11/16/92
depth		11 in.	13 in.	4-6 ft.	10-12 ft.	4-6 ft.	12-14 ft.	4-6 ft.	10-12 ft.	4-6 ft.	12-13.5 ft.	0.5-1.5 ft.	2-3 ft.	2-3 ft.
	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
TCLP Volatiles														
benzene	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
2-butanone	200	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10
carbon tetrachloride	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
chlorobenzene	100	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
chloroform	6	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
1,1-dichloroethene	0.7	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
1,2-dichloroethane	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
tetrachloroethene	0.7	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
trichloroethene	0.5	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05	<.05
vinyl chloride	0.2	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10	<.10
TCLP Base Neutrals		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
TCLP Herbicides		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
TCLP Pesticides		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

NOTES: B - Compound also detected in the blank sample
ND - Not detected

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TABLE 3-11

WCC TCLP METALS ANALYSIS RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

92C4246

	Reg Level	GKW-1	GKW-2	GKW-3	GKW-4	GKW-5	GKW-6	GKW-7	GKW-8	GKW-9	GKW-10	GKW-11	GKW-12	GKW-13	GKW-14	GKW-15	GKW-16
date		11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/9/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92	11/10/92
depth		18 in.	12 in.	12 in.	25 in.	18 in.	12 in.	16 in.	16 in.	17 in.	15 in.	18 in.	19 in.	20 in.	20 in.	11 in.	13 in.
	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
TCLP Metals																	
arsenic	5,000	<51.8	<51.8	<51.8	<51.8	<51.8	<51.8	489 B	<51.8	<52.3	<52.3	<52.3	<52.3	<52.3	<52.3	<54.3	<54.3
barium	100,000	590	770	592	247 B	576	385 B	622	687	343 B	493 B	1,490	947	1,280	1,200	477 B	572 B
cadmium	1,000	10 B	48	8.9 B	20.5 B	8.9 B	121	17.1 B	18.1 B	18.4 B	8.3 B	12 B	24.1 B	16.3 B	14.7 B	331	9.0 B
chromium	5,000	<9.1	<9.1	12.6 B	<9.1	38	<9.1	<9.1	<9.1	<9.2	<9.2	<9.2	14.4 B	29.2 B	16.8 B	24.9 B	<9.8
lead	5,000	94.6 B	939	1,250	6,980	7,250	<81.6	<81.6	<81.6	129 B	481	1,310	678	300 B	329	<94.8	<94.8
mercury	200	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.30	<0.30
selenium	1,000	<79.4	<79.4	<79.4	<79.4	<79.4	<79.4	<79.4	<79.4	<76.2	<76.2	<76.2	<76.2	<76.2	<76.2	<83.4	<83.4
silver	5,000	<6.4	<6.4	<6.4	<6.4	<6.4	<6.4	<6.4	<6.4	<6.9	<6.9	<6.9	<6.9	<6.9	<6.9	<7.3	<7.3
Reactive cyanide		<0.24	<.27	<0.23	<0.25	<0.24	<0.26	<0.26	<0.26	<0.22	<0.23	<0.24	<0.24	<0.23	<0.23	<0.24	<0.25
Reactive sulfide		<47.7	<54.6	<46.7	<49.8	<49.0	<51.5	<51.5	<52.7	<44.7	<46.4	<47.9	<48.0	<46.3	<46.7	<47.7	<50.1
Flashpoint		>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200
pH		7.06	7.49	8.07	7.55	7.84	7.76	7.47	7.93	8.61	7.68	8.26	8.21	7.68	8.14	8.33	7.54

NOTES: B - Compound also detected in the blank sample
Shaded cells indicate exceedances of the regulatory level.

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TABLE 3-11

WCC TCLP METALS ANALYSIS RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

92C4246

	Reg Level	B1-F	B1-P	B2-F	B2-P	B3-F	B3-P	PZ-5F	PZ-5P	SED1	SED2	SED3
date:		11/13/92	11/13/92	11/13/92	11/13/92	11/13/92	11/13/92	11/12/92	11/12/92	11/16/92	11/16/92	11/16/92
depth:		4-6 ft.	10-12 ft.	4-6 ft.	12-14 ft.	4-6 ft.	10-12 ft.	4-6 ft.	12-13.5 ft.	0.5-1.5 ft.	2-3 ft.	2-3 ft.
	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
TCLP Metals												
arsenic	5,000	<54.3	<54.3	<54.3	<54.3	<54.3	<54.3	<54.3	75.1 B	199 B	<54.3	<54.3
barium	100,000	714	315 B	756	124 B	866	206 B	922	329 B	846	51.3 B	60.5 B
cadmium	1,000	6.6 B	<5.6	66.9	<5.6	9.2	<5.6	6.6 B	<5.6	122	162	16.4 B
chromium	5,000	<9.8	60.9	<9.8	58.1	69.2	25.5 B	<9.8	55.9	44.5	33.6 B	28.9 B
lead	5,000	371	<94.8	<94.8	<94.8	546	<94.8	3820	<94.8	<94.8	<94.8	<94.8
mercury	200	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30	1.4 B	<0.30	<0.30	<0.30	<0.30
selenium	1,000	<83.4	<83.4	<83.4	<83.4	<83.4	<83.4	<83.4	<83.4	<83.4	<83.4	<83.4
silver	5,000	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	36.2	<7.3	9.2 B
Reactive cyanide		<0.30	<0.38	<0.24	<1.23	<0.25	<0.70	<0.24	<0.33	<0.23	<0.61	<1.05
Reactive sulfide		<59.1	<75.6	<48.8	<245	<50.5	<139	<47.9	<60.3	<47.8	<123	<210
Flashpoint		>200	>200	>200	>200	>200	>200	>200	>200	>200	>200	>200
pH		8.97	8.08	8.27	7.73	8.99	7.89	7.64	7.46	9.16	8.22	8.27

NOTES: B - Compound also detected in the blank sample
Shaded cells indicate exceedances of the regulatory level.

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The concentrations for reactive cyanide, reactive sulfide, flashpoint, and pH were within the regulatory ranges.

3.4.2 Fill Samples

The laboratory results of the samples collected from the 2 to 8 foot depth in the fill (Table 3-12 and Figure 3-7) have shown no concentrations of volatile organics or base neutral compounds above the NJDEPE proposed subsurface cleanup standards. The laboratory reported compounds for these samples are consistent with the surface soil samples. Although the concentrations are also similar, these samples do not exceed the proposed standards because the standards for certain compounds are more stringent for surface samples. The subsurface standards have been developed to protect the groundwater whereas surface soil standards are developed to prevent human exposure to contaminants.

3.4.3 Peat Samples

The laboratory results of the peat samples (Table 3-13 and Figure 3-7) show volatile organic and base neutral compounds consistent with the overlying fill. The concentrations of these compounds were reported below the NJDEPE proposed subsurface soil cleanup standards for each compound with the exception of naphthalene in sample PEAT-3 and some PAHs. The concentration of naphthalene in this sample is 198 ppm, above the 100 ppm standard. Sample PEAT-3 was collected from boring MP-2 at a depth of 12 to 14 feet below ground surface. The boring is located near the northwest corner of the plant building. The PAHs detected include chrysene (PEAT-2, PEAT-3, and PEAT-4) in concentrations up to 1176 ppb, benzo(a)pyrene (PEAT-2, PEAT-3, and PEAT-4) up to 1170 ppb, and benzo(k)fluoroanthene (PEAT-3 and PEAT-4) up to 22,229.

3.4.4 Background Soil Samples

The results of the background soil samples collected under the parking lot in the front of the Goody building (Table 3-14) show no concentrations of volatile organic compounds above the NJDEPE proposed surface soil standards. The only compounds

TABLE 3-12

FILL SAMPLING RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY
92C4246

date depth	NJDEPE PROPOSED CLEANUP STANDARD	LDR CONCENTRATIONS	B1-F 11/13/92 4-6 ft. ug/kg	B2-F 11/13/92 4-6 ft. ug/kg	B3-F 11/13/92 4-6 ft. ug/kg	PZ-5F 11/12/92 4-6 ft. ug/kg
Volatile Organics						
methylene chloride	10,000	33,000	9	7	24 J	8
chloroform	1,000			2 J		
2-butanone	50,000	36,000		15		
4-methyl-2-pentanone	50,000			7 J		
m,p-xylene	10,000	28,000		3 J	14 J	
trichlorofluorethane	--					3 J
TOTAL VOLATILE ORGANICS			9	34	38	11
Volatile Organics TICs						
unknown hydrocarbon			110	49	790	1,275
unknown aromatic			145	43		
unknown			12	42	420	19
undecane (8CI9CI)						33
bicyclo[3.1.1]hept-2-ene,3,6,6-trimethyl			78			
hexanal (8CI9CI)				28		
TOTAL VOLATILE ORGANIC TICS			345	162	1,210	1,327
Base Neutrals						
isophorone	10,000		56 J			
naphthalene	100,000			97 J	182 J	
2-methylnaphthalene	--				79 J	
acenaphthylene	--		55 J		77 J	
acenaphthene	100,000		148 J	88 J	705	63 J
dibenzofuran	--		87 J	59 J	415 J	42 J
fluorene	100,000		117 J	105 J	621	57 J
phenanthrene	--		1,137	806	3,521	661
anthracene	500,000		281 J	249 J	803	175 J
fluoranthene	500,000		1,273	518	4,029	616
pyrene	500,000		3,211	1,767	6,777	1,328
butylbenzlphthalate	100,000				155 J	
benzo(a)anthracene	500,000		804	481	1,970	348 J
bis(2-ethylhexyl)phthalate	100,000		788	227 J	520	
chrysene	500,000		813	399 J	1,872	354 J
benzo(b)fluoranthene	--		596	279 J	2,228	153 J
benzo(k)fluoranthene	500,000		1,273	562	1,656	401
benzo(a)pyrene	100,000		703	328 J	1,910	298 J
dibenzo(a,h)anthracene	500,000				254 J	
benzo(g,h,i)perylene	500,000				589	
TOTAL BASE NEUTRAL COMPOUNDS			14,874	4,134	29,459	4,985
Base Neutrals TICs						
unknown hydrocarbon			50,720	10,470	33,380	3,500
unknown aromatic				1,100		
unknown				6,700		1,500
aldol condensate				1,800		1,300
unknown PAH						180
1,3,6-heptatriene, 2,5,5-trimethyl			1,800			
benzene, 1-methyl-3-(1-methylethyl)-			16,000			
bicyclo[2.2.1]hept-2-ene, 1,7,7-trimethyl-			2,600			
1-phenanthrenecarboxylic acid			1,700			
benzoic acid, 2-[[[4-(acetylamino)			2,000			
TOTAL BASE NEUTRAL TICS			74,820	20,070	33,380	6,480

NOTES: B - Compound also detected in blank sample
J - Estimated value; detected below the method detection limit
A blank cell indicates the compound was not detected
Shaded cells indicate exceedances of the proposed NJDEPE residential subsurface soil standards

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TABLE 3-13

WCC PEAT SAMPLING RESULTS SUMMARY
GOODY PRODUCTS
KEARNY, NEW JERSEY
92C4246

date depth	NJDEPE PROPOSED CLEANUP STANDARD	LDR CONC.	PEAT-1 11/10/92 12-13.5 ft ug/kg	PEAT-2 11/4/92 10-12 ft ug/kg	PEAT -3 11/5/92 12-14 ft ug/kg	PEAT-4 11/9/92 8-10 ft ug/kg	B1-P 11/13/92 10-12 ft. ug/kg	B2-P 11/13/92 12-14 ft. ug/kg	B3-P 11/13/92 10-12 ft. ug/kg	PZ-5P 11/12/92 12-13.5 ft. ug/kg
Volatile Organics										
methylene chloride	10,000	33,000	132 J	77	32	126	12	30 J	80 J	13
carbon disulfide	--			21	55					
trichlorofluoromethane	--									8 J
chloroform	1,000				7 J	12 J				
2-butanone	50,000	36,000		40	63	35 J	37		156 J	24
benzene	1,000	3,700		7 J		59				
toluene	500,000	28,000		11 J						
chlorobenzene	1,000	5,700		53						
m,p-xylene	10,000	28,000		8 J			6 J		66 J	
o-xylene	10,000	28,000		5 J						
trichloroflouroethane	--									9
TOTAL VOLATILE ORGANICS			132	222	157	232	55	30	302	54
Volatile Organics TICs										
unknown hydrocarbon			9,000	29	48	1,180	82			228
unknown aromatic				418		3,100	145		1210	
unknown				37		142	117		310	165
benzene, 1-methyl-3-propyl-						1,500				
benzene, 1-methyl-3-(1-methylethyl)						870				
TOTAL VOLATILE ORGANIC TICS			9,000	484	48	6,792	344	0	1520	393

B - Compound also detected in blank sample
J - Estimated value; detected below method detection limit
A blank cell indicates the compound was not detected
Shaded cells indicate exceedances of the proposed NJDEPE residential subsurface soil standards

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TABLE 3-13

WCC PEAT SAMPLING RESULTS SUMMARY
GOODY PRODUCTS
KEARNY, NEW JERSEY
92C4246

date depth	NJDEPE PROPOSED CLEANUP STANDARD	LDR CONC.	PEAT-1 11/10/92 12-13.5 ft ug/kg	PEAT-2 11/4/92 10-12 ft ug/kg	PEAT -3 11/5/92 12-14 ft ug/kg	PEAT-4 11/9/92 8-10 ft ug/kg	B1-P 11/13/92 10-12 ft. ug/kg	B2-P 11/13/92 12-14 ft. ug/kg	B3-P 11/13/92 10-12 ft. ug/kg	PZ-5P 11/12/92 12-13.5 ft. ug/kg
Base Neutrals										
naphthalene	100,000				198,168		619 J			
2-methylnaphthalene	--						217 J			
acenaphthylene	--						76 J			
acenaphthene	100,000			166 J			257 J		178 J	
dibenzofuran	--						213 J			
fluorene	100,000			188 J			321 J		174 J	
phenanthrene	--		205 J	2,047	1022 J	1,685	1691		844 J	114 J
anthracene	500,000			526 J	299 J	468 J	535 J		181 J	
di-n-butylphthalate	100,000		3516 B	375 J	3909 B	4094 B				
fluoranthene	500,000		276 J	2,495	1,544	2,281	1101		881 J	137 J
pyrene	500,000		446 J	2,394	1,440	1,987	2824		1415	668
butylbenzylphthalate	100,000		821 B							
benzo(a)anthracene	500,000			1187 J	859 J	1164 J	613 J			473 J
bis(2-ethylhexyl)phthalate	100,000		993 B	1,316	406 B	1312 B	750			780
chrysene	500,000			1029 J	795 J	1176 J	597 J			514 J
benzo(b)fluoranthene	--			1077 J	1,739	1,906	350 J			122 J
benzo(k)fluoranthene	500,000			505 J	2,034	22,229	630			306 J
benzo(a)pyrene	100,000			942 J	930 J	1170 J	478 J			313 J
benzo(g,h,i)perylene	500,000			266 J						
TOTAL BASE NEUTRALS			927	14,513	208,830	34,066	11272	0	3673	3427
Base Neutrals TICs										
unknown hydrocarbon			95,100	66,200	20,910	8,250	30420	109900	33380	7560
unknown aromatic				5,900	920					
unknown					16,390	5,570		15000		1400
2-phenathrenol, 4b,5,6,7,8,					4,500					
1-heneicosyl formate					1,300					
aldol condensate			2,700	3,600		910	2100	8400	4300	2800
1H-3a,7-methanoazulene				8,600						
docosane			4,200							
unknown PAH								950		4630
3-eicosene, (E)								2200		
1-dotriacontanol								5200		
eicosane								16000		
pentatriacontane								8100		
1,2-tetradecanediol									3400	
undecane, 3,8-dimethyl									12000	
eicosane, 7-hexyl									4800	
1H-3a, 7-methanoazulene							4400			510
phosphonic acid, dioctadecly ester							840		980	
2-phenanthrenol			3,200				420		640	1300
heptadecane, 2,6,10,15-tetramethyl							3900			
TOTAL BASE NEUTRAL TICS			105,200	84,300	44,020	14,730	42,080	165,750	59,500	18,200

B - Compound also detected in blank sample
J - Estimated value; detected below method detection limit
A blank cell indicates the compound was not detected
Shaded cells indicate exceedances of the proposed NJDEPE residential subsurface soil standards

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TABLE 3-14

WCC BACKGROUND SOIL SAMPLING RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY
92C4246

date: / depth:	NJDEPE PROPOSED RESIDENTIAL STANDARD	B-4 ug/kg	B-5 ug/kg	B-6 ug/kg	B-7 ug/kg	B-8 ug/kg
Volatile Organics						
methylene chloride	10,000	3 B	3 B	3 B	3 B	
chloroform	1,000	5 J				5 J
TOTAL VOLATILE ORGANICS		5				5
Volatile Organics TICs						
unknown hydrocarbon		567	61	66	170	15
unknown aromatic		394	23			
unknown		80			6	
benzene, 2-ethyl-1,4-dimethyl		130				
benzene, 1-methyl-4-propyl		210				
benzene, 1-methyl-2-(1-methylethyl)		120				
benzene, 1-methyl-2-(1-methylethyl)		66				
cyclotetrasiloxane, octamethyl				30		
bicyclo[3.1.1]hept-2-ene,3,6,6-trimethyl			76	10		
TOTAL VOLATILE ORGANIC TICS		1,567	160	106	176	15
Base Neutrals						
2-methylnaphthalene	--	40 J				
acenaphthylene	--	93 J	71 J			118 J
acenaphthene	100,000	390 J	60 J		52 J	43 J
dibenzofuran	--	149 J				
fluorene	100,000	405	83 J		42 J	41 J
phenanthrene	--	3,574	1,036		443	556
anthracene	500,000	1,065	243 J		121 J	195 J
di-n-butylphthalate	100,000	92 J	246 J			
fluoranthene	500,000	5,285	1,613		734	1053
pyrene	500,000	4,630	1,270		573	947
benzo(a)anthracene	660	2,782	634		293 J	549
bis(2-ethylhexyl)phthalate	49,000	198 J				
chrysene	660	2,596	611		319 J	599
benzo(b)fluoranthene	--	2,948	1,130		480	585
benzo(k)fluoranthene	660	2,060				660
benzo(a)pyrene	660	2,672	661		329 J	623
indeno(1,2,3-cd)pyrene	660	198 J	208 J			211 J
dibenzo(a,h)anthracene	660	467	93 J			105 J
benzo(g,h,i)perylene	660	788	190 J		110 J	193 J
TOTAL BASE NEUTRAL COMPOUNDS		30,432	8,149	0	3,496	6,478
Base Neutrals TICs						
unknown hydrocarbon		560	5,670		1,540	800
unknown		6,360	8,400	2,100	2,300	1870
aldol condensate		1,900	1,100	1,100	1,100	1400
unknown PAH		2,720	280		380	410
benzo[e]pyrene		710	400		210	410
benz[a]anthracene, 1-methyl		170				
benzo[j]fluoranthene		1,200				
1-dotriacontanol			290			
eicosane, 7-hexyl			420			
unknown condensate			380			
TOTAL BASE NEUTRAL TICS		13,620	16,940	3,200	5,530	4,890

NOTES: B - Compound also detected in blank sample
J - Estimated value; detected below the method detection limit
A blank cell indicates the compound was not detected
Shaded cells indicate exceedances of the proposed NJDEPE residential surface soil standards

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by: es date: 1/26/93

TABLE 3-14

WCC BACKGROUND SOIL SAMPLING RESULTS SUMMARY
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

92C4246

	NJDEPE	B-4	B-5	B-6	B-7	B-8
date:	RESIDENTIAL	12/22/92	12/22/92	12/22/92	12/22/92	12/22/92
depth:	STANDARD	4-6 ft.	10-12 ft.	4-6 ft.	12-14 ft.	4-6 ft.
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
TAL Metals						
aluminum	--	9220	13700	9480	4370	7560
arsenic	20	8.8	4.7	1.8	1.4	7.9
barium	600	306	125	76.1	59.3	148
beryllium	2	0.54 B	0.54 B	0.51 B	0.26 B	0.47 B
cadmium	1	0.82 B	0.55 B			0.43 B
calcium	--	17300	3940	3840	8960	10500
chromium	--	104	14.2	29.3	15	15.5
cobalt	--	10.5	5.7	8.5	9.6	8.0
copper	600	65.3	101	78.6	39.6	68.4
iron	--	20700	16400	19700	10800	16500
lead	100	377	228	48.3	102	189
magnesium	--	4380	2760	2360	5440	3450
manganese	--	346	332	506	330	346
mercury	14	3.7	0.28			0.59
nickel	250	21.3	11.2	15	36.2	19.6
potassium	--	2190	528	1220	519	1200
selenium	1		0.24 B		0.55	
silver	40	10.3	7.9	10.5	5.4	7.9
sodium	--	406	229	286	266	443
vanadium	380	33.1	23.2	18.7	15.2	20.9
zinc	1500	217	159	47.4	83.4	167

NOTES: B - Compound also detected in the blank sample
A blank cell indicates the compound was not detected
Shaded cells indicate exceedances of the NJDEPE proposed residential cleanup standards

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detected were methylene chloride and carbon disulfide. The concentrations of methylene chloride were flagged with a "B" indicating the compound was also detected in the method blank. Carbon disulfide was detected in two samples, B-4 and B-8. Both samples had reported concentrations of 5J with the "J" indicating the compound was an estimated value because it was detected but below the method detection limit.

The base neutral analyses of the soil samples show five compounds in sample B-4 and one compound in sample B-5 have concentrations above the NJDEPE proposed surface soil cleanup standards. The compounds above the standards in sample B-4 include benzo(a)anthracene (2.78 ppm), chrysene (2.60 ppm), benzo(k)fluoranthene (2.06 ppm), benzo(a)pyrene (2.67 ppm), and benzo(g,h,i) perylene (0.79 ppm). The only compound detected above the cleanup standards in sample B-5 is benzo(a)pyrene. The reported concentration of this compound is 0.661 ppm, just above the cleanup standard of 0.66 ppm. All other base neutral compounds were reported below the proposed cleanup standards.

3.4.5 Sediment Samples

The results of the sediment samples collected from three locations in Dead Horse Creek (Table 3-15 and Figure 3-8) show no concentrations of volatile organic or base neutral compounds above the NJDEPE proposed subsurface soil cleanup standards. The compounds detected in the sediment samples are consistent with those detected in the fill and peat in other areas of the site. However, the range of concentrations of these compounds is lower in the sediment than in the other media.

TABLE 3-15

WCC SEDIMENT SAMPLE ANALYSIS RESULTS SUMMARY

GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY
92C4246

date depth	NJDEPE Proposed Cleanup Standard	LDR CONCENTRATION	SED1 11/16/92 0.5-1.5 ft. ug/kg	SED2 11/16/92 2-3 ft. ug/kg	SED3 11/16/92 2-3 ft. ug/kg
Volatile Organics					
carbon disulfide	–				6,039
chloroform	1,000			88 J	153 J
2-butanone	50,000	36,000	11 J	408	
toluene	500,000	28,000			58 J
ethylbenzene	100,000	6,000		381	2,565
m-xylene	10,000	28,000	5 J	1,939	19,512
o-xylene	10,000	28,000	4 J	5,955	2,833
TOTAL VOLATILE ORGANICS			20	8,771	31,160
Volatile Organic TICs					
unknown hydrocarbon			51	20,930	17,770
unknown			10		
unknown aromatic			18		
heptane, 2-methyl-				1,800	
cyclohexane, 1,3-dimethyl-,cis-				5,000	
cyclohexane, 1,2-dimethyl-,trans-				3,100	1,100
cyclohexane, 1,3-dimethyl-,trans-					1,100
heptane, 2,5-dimethyl-				1,300	
octane, 3-methyl-				3,200	
octane, 3,6-dimethyl-				1,600	
undecane					3,300
TOTAL VOLATILE ORGANIC TICs			79	36,930	23,270
BASE NEUTRALS					
isophorone	10,000		48 J		278 J
naphthalene	100,000				547 J
acenaphthene	100,000		52 J	338 J	
phenanthrene	–		102 J	981 J	
anthracene	500,000				540 J
fluoranthene	500,000		166 J	552 J	
pyrene	500,000		286 J	1,342	496 J
butylbenzylphthalate	100,000		146 J		
benzo(a)anthracene	660			634 J	
bis(2-ethylhexyl)phthalate	49,000		681	5,998	10,232
chrysene	660			675 J	
di-n-octylphthalate	100,000		272 J	419 J	1,028 J
benzo(b)fluoranthene	–			585 J	
benzo(k)fluoranthene	660			579 J	
benzo(a)pyrene	660			487 J	
TOTAL BASE NEUTRALS			681	7,340	10,232
BASE NEUTRAL TICs					
unknown			2,500		
unknown hydrocarbon			12,110	137,500	126,700
heptadecane					3,200
pentacosane					3,100
heptane, 3-ethyl-5-methyl			870		
TOTAL BN TICS			15,480	137,600	133,000

NOTES: J - Estimated value; compound detected below the method detection limit.

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by: es date: 1/26/93

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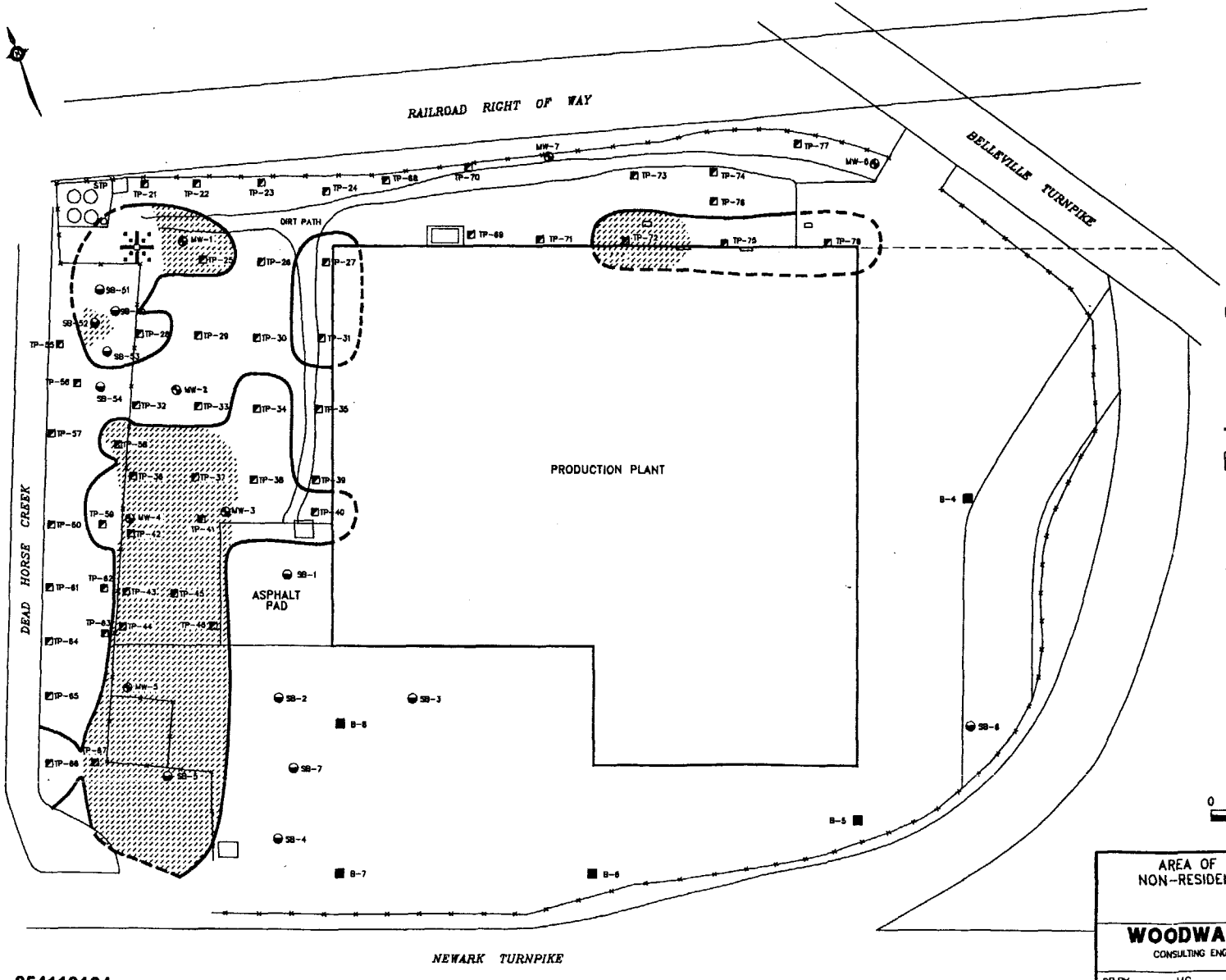

LEGEND

- MONITORING WELLS
- SOIL BORINGS
- CONVERSE 1988 TEST PITS
- WCC 1992 TEST PITS
- AREA OF CONTAMINATED SURFACE SOIL (0 TO 2 FT) (DASHED WHERE INFERRED)
- AREA OF CONTAMINATED SOIL DEEPER THAN 2 FT

NOTES:

1. AREA OF CONTAMINATED SOIL IS BASED ON EXCEEDANCES OF NJDEPE PROPOSED NON-RESIDENTIAL CLEAN UP STANDARDS FOR:

LEAD	(600 ppm)
CADMIUM	(100 ppm)
ZINC	(1500 ppm)
NICKEL	(2400 ppm)
COPPER	(600 ppm)
TPHC	(10,000 ppm)

0 80 160 FT

SCALE

AREA OF CONTAMINATED SOIL ABOVE NJDEPE
NON-RESIDENTIAL PROPOSED CLEANUP STANDARDS
GOODY PRODUCTS, INC.
KEARNY, NEW JERSEY

WOODWARD-CLYDE CONSULTANTS

CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS
WAYNE, NEW JERSEY

DR.BY	MG	SCALE	AS SHOWN	PROJ.	92C4246
CK'D.BY	EJS	DATE	MAR 17 1993	FIG.NO.	4-1

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6.0
CONCLUSIONS

The following conclusions were drawn from this investigation:

1. There is extensive area-wide contamination in and surrounding Kearny, New Jersey, including industry, railyards, turnpikes and landfills.

2. There are at least two ECRA sites within a one mile radius of the Goody site - BASF and Alpha Metals. Unlike the BASF site, the Alpha Metals contaminants and geologic conditions are similar to the Goody site, and may therefore provide some guidance as to State concerns in the area.

3. A file search of other industrial sites in close proximity to the Goody site has identified three contaminated facilities which are undergoing state supervised investigations and cleanups - Koppers Coke, Diamond Shamrock and Standard Chlorine - and which may have contributed to past and present contamination at the Goody site.

4. The previous Converse investigation of the Goody site showed concentrations of cadmium, lead, nickel, and TPHC above the NJDEPE proposed cleanup standards for residential surface soils, but volatile and base neutral organic compound samples were not collected during that investigation.

5. Results of the WCC soil sampling investigation confirm the Converse testing for metals. Concentrations of volatile organics (xylene and ethylbenzene) exceeded NJDEPE proposed cleanup standards for surface soils in only one sample (GKW-1). Much of the metals contaminated soil contains volatile organics which exceed Land Disposal Restrictions. The results of the base-neutral analyses show 6 compounds exceeded NJDEPE proposed cleanup standards for surface soils randomly throughout the site.

6. Subsurface (greater than 2 feet deep) samples collected in the fill did not show any volatile organic or base neutral compounds above the NJDEPE proposed cleanup standards. Subsurface samples collected for the peat layer (7 to 12 feet deep) showed naphthalene and some PAHs above the NJDEPE proposed cleanup standards.

7. TCLP analyses of unsaturated soil (to a 4 foot depth) showed no volatile, base neutral, pesticide or herbicide compounds above the regulatory limits, and the TCLP metals analyses showed only two samples (GKW-4 and GKW-5) with lead concentrations above the regulatory limit.

8. Surface samples collected at background areas (where no Goody operation activities occur) showed no volatile organic compounds above NJDEPE proposed cleanup standards. The base-neutral analyses showed five compounds above NJDEPE proposed cleanup standards in two samples (B-4 and B-5).

9. Groundwater flow at the site (during Fall and early Winter of 1992) was from south to north in the shallow unconfined aquifer and south-southeast to north-northwest in the deep semi-confined aquifer. Long-term monitoring of the groundwater levels show the wells are tidally influenced.

10. Results of the WCC groundwater sampling event showed benzene, chlorobenzene, and 1,4-dichlorobenzene above NJDEPE proposed groundwater cleanup standards in two upgradient monitoring wells. Chlorinated solvents, including TCE and vinyl chloride, were detected above NJDEPE proposed cleanup standards in the west yard. Metal concentrations, including arsenic, chromium, nickel, lead and silver, were detected above NJDEPE groundwater cleanup standards in some wells.

11. There does not appear to be any migration of contamination from soil to groundwater at the site. The shallow groundwater quality seems consistent with soil contaminants found in the man-placed fill.

12. Capping the site is an appropriate approach to the soil contamination, provided there are adequate site use limitations and deed restrictions. If any cleanup is required, non-residential standards are appropriate. Due to the regulatory uncertainty and the condition of the surrounding area, some variance from even non-residential standards is possible. A reasonable soil cleanup program could involve landfarming volatile organics and PAH's until below LDR's, followed by off-site disposal, which at non-residential standards could cost approximately two million dollars for saturated soil, less for surface soils.

13. Due to a high likelihood of contamination from off-site sources and high background contamination, no action (with natural remediation) or capping the site (with or without a slurry wall) are appropriate methods for groundwater remediation at the Goody site. Groundwater remediation, if necessary, would be most appropriate on an area-wide basis because the primary sources (e.g. landfills and contaminated structural fill) are expected to be widespread throughout Kearny.

7.0
LIMITATIONS

WCC's work is in accordance with our understanding of professional practice and environmental standards at the time the work was performed. Professional judgements presented are based on our evaluation of technical information gathered and on our understanding of site conditions and site history. Our analyses, interpretations, and judgements rendered are consistent with professional standards of care and skill ordinarily exercised by the consulting community and reflect the degree of conservatism WCC believes proper for this project at this time. Methods are constantly changing and it is recognized that standards may change because of improvements in the state of the practice. In addition, much of this work product evaluates how analytical results compare to proposed cleanup standards. Those numerical concentration cleanup standards are changing so evaluations, remedial options and conclusions can be expected to be different in the future depending on the final promulgated standards.

The information used for this work is presented in this report and includes subsurface and water quality analyses. The report reflects subsurface conditions for the indicated locations and dates. WCC endeavored to collect samples representative of site conditions. Soil and water quality samples, however, can only represent a small portion of the subsurface conditions in the area, both in volume and through time. The interpretations made in this report are based on the assumption that subsurface conditions do not deviate appreciably from those found during our field investigations.

The remedial options assessment was based on our current understanding of site conditions and the technologies as they are applied today. Remedial technologies and regulations controlling their use are changing very quickly, so other alternatives may become more attractive in the future.

Chromium and PAH contamination exist throughout the fill. NJDEPE may allow alternative cleanup levels because both these contaminants are area-wide concerns. Because detailed delineation has not been completed in soil regimes beneath the water table and subsurface cleanup guidelines for heavy metals have not been

NJDEPE, only soils to a depth of four feet (unsaturated soils) in the North and West yards are considered by this remedial option study. Soils in the East and South yards have been sampled and are considered background because no industrial activity occurred in those areas. (They are paved employee parking and entrance roadways).

The soil in these areas shows contamination which is thought to be representative of the man-placed fill beneath the entire site, and likely similar to most of the surrounding filled properties in the Kearny area. Removal of all fill in the Kearny area is not considered reasonable or feasible, hence, the area has been excluded from the estimate. Additionally, the results of the sediment sampling in Dead Horse Creek cannot be compared to any standards because none exist at this time.

[1] N.J.A.C. 7:26D "Proposed Cleanup Standards for Contaminated Sites" issued Jan 1992.

[2] Pamukcu, S., Principles and Practices for Petroleum Contaminated Soils (ed. E.J. Calabrese and P.T. Kostecki), p.p. 367-385 (1993).

[3] Cullinarie, M.J., R.M. Baricka, Principles and Practices for Petroleum Contaminated Soils, (ed. E.J. Calabrese and P.T. Kostecki), pp. 349-358, 1993.

[4] Utsunomiya, T. Japanese Patent Application Publication Kokai, 57-190. Application Number 55-72959. (1980).

[5] Baker, A.J.M. and Brooks, R.R., Biorecovery, 1, p. 81-126 (1989).

[6] Baker, A.J.M. and Brooks, R.R., and Reeves, R., New Scientist, 10 March 1988, p. 44-48.

[7] Shaw, A.J. "Heavy Metal Tolerance in Plants": Evolutionary Aspects: CRC press (1989).

[8] Valine, S.B., Chilcote, D.D., "BioTrol Soil Washing System", BioTrol, Inc., Chaska,, Minnesota.

[9] United States Environmental Protection Agency, SITE, "BioTrol Soil Washing System for Treatment of a Wood Preserving Site". EPA15401A5-911003, February, 1992.

[10] Means Site Work and Landscape Cost Data, 11th edition, R.S. Means Company, Inc., 1992.

newell

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EXHIBIT 10

January 22, 1997

Mr. James K. Hamilton
Enforcement Element
N J DEP Div. of Water Resources
CN 029
Trenton, N J 08625-0029

RE: GOODY PRODUCTS, INC.
969 Newark Turnpike, Kearny
NJ PDES Permit No. 0029505

Mr. Hamilton:

I believe your office has a file on the subject water discharge permit because of the cited violations at the Goody Products, Inc. location (1989-on). The State of New Jersey took enforcement action in the form of an Order and Civil Administrative Penalty.

Newell Company acquired Goody Products after the violations had been resolved; operations at the site ceased in May, 1994 and the facility was vacated soon thereafter.

Mr. Pat Evangelista of the US EPA Region 2 office in New York is seeking documents as they may relate to potential contamination of the Passaic River Study Area. His telephone number is 212/ 637-4403.

Please call Mr. Evangelista to discuss how he may have access to the subject files.

Thank you for your cooperation.

Dr. Peter J. Schultz

Peter J. Schultz, Ph.D.
Director, Environmental Affairs

telephone: 815/969-6151

9/91

DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY

COMMUNITY RIGHT TO KNOW SURVEY FOR 1991

PART

to satisfy requirements under SARA, Title III, Section 312
and New Jersey Community Right to Know

EXHIBIT 1

Please type this form.

4 1 3 9 0 9 0 0 0 0--3 9 9 9--0 9 0 7

GOODY PRODUCTS, INC.

ATTN: TIM S. LANIER
969 NEWARK TURNPIKE
KEARNY, NJ 07032

Indicate changes to mailing address on the mailing label.

(A) FACILITY LOCATION

If the facility location is different than the address on the facility identification label on Part 2 or is not known, enter the correct facility address below and correct the facility identification label.

(B) Does this facility use, store or produce any compressed gases, or any flammable, combustible, reactive, corrosive or toxic substances?

(See Reportable Substances and Thresholds) [X] Yes [ ] No

(C) Briefly describe the nature of the operations or business conducted by your company at this facility: Manufacturing, assembly, and warehousing of hair care accessories.

(D) Number of employees at facility: 320

(E) *Number of facilities in New Jersey* 1

(F) *Dun and Bradstreet No.* 001340876

(G) Check the box if you have a R&D laboratory exemption or if you have attached a R&D exemption application. [ ]

(H) CERTIFICATION OF OWNER/OPERATOR OR AUTHORIZED REPRESENTATIVE — I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Signature X Calvin H. Helms Date _____ Fax # (404) 846-8632
Phone # (404) 846-8481
Name (Type) Calvin H. Helms Title Vice Pres.-Manufacturing

(I) POLICE AND FIRE DEPARTMENT — Enter the respective phone numbers, names and addresses (including Zip Code) of your local police and fire departments in the spaces below.

POLICE DEPT. Phone Number (201) 998-1313
Name Kearny Police Department
Address 402 Kearny Avenue
Municipality Kearny, N. J. Zip 07032

FIRE DEPT. Phone Number (201) 991-1400
Name Kearny Fire Department
Address 109 Midland Avenue
Municipality Kearny, N. J. Zip 07032

(J) FACILITY EMERGENCY CONTACT
Name Bob Anuszewski Title Foreman
Facility Phone Number (201) 997-3000 Emergency Contact Phone Number (201) 669-5702

NOTE: Make copies of this survey! The law requires that you send a copy to your COUNTY LEAD AGENCY, LOCAL EMERGENCY PLANNING COMMITTEE AND YOUR LOCAL POLICE AND FIRE DEPARTMENTS.
(County agency and local committee addresses in Instructions)

Return original to: NJDEPE
COMMUNITY RIGHT TO KNOW
CN 405
Trenton, NJ 08625-0405

FOR INTERNAL USE ONLY U STAT [ ] F STAT [ ]

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FACILITY IDENTIFICATION AND SITE LOCATION

4 1 3 9 0 9 0 0 0 0 0

GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

PART 2
CHEMICAL INVENTORY PAGE

DEQ-094

IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Waste Oil CAS No. ___-___-___ DOT No. 1270 Substance No. (if available) 2651 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 66, 70, ___, ___, ___	(Enter Code) Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 47 Conditions 01, 04 Location(s) Waste Storage area
Substance Waste Oil CAS No. ___-___-___ DOT No. 1270 Substance No. (if available) 2651 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 70, ___, ___, ___	Max. Daily 11 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 47 Conditions 01, 04 Location(s) Tool Room
Substance Waste Oil CAS No. ___-___-___ DOT No. 1270 Substance No. (if available) 2651 Percent 52 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 70, ___, ___, ___	Max. Daily 10 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 48 Conditions 01, 04 Location(s) Heat Treatment Oil / Water Seperator
Substance Acetone CAS No. 67-64-1 DOT No. 1090 Substance No. (if available) 006 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ___, ___	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 46 Conditions 01, 04 Location(s) Metalizing Dept. Flammable Liquid Store Room
Substance Acetylene CAS No. 74-86-2 DOT No. 1001 Substance No. (if available) 15 Percent 60 (Code) State G (Code) Trade Secret ☐ (Check if claiming)	67, 69, 70, ___, ___	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 40 Conditions 02, 04 Location(s) Maintenance Dept.
Substance Acetylene CAS No. 74-86-2 DOT No. 1001 Substance No. (if available) 15 Percent 60 (Code) State G (Code) Trade Secret ☐ (Check if claiming)	67, 69, 70, ___, ___	Max. Daily 12 Avg. Daily ___ Days Onsite 365 (Actual Number)	Container 40 Conditions 02, 04 Location(s)
Substance Alkaline Water Treatment CAS No. NA-___-___ DOT No. 1760 Substance No. (if available) 2087 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, ___, ___, ___	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 01, 04 Location(s) Boiler Room

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

PART 2
CHEMICAL INVENTORY PAGE

DEQ-094 -

IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Paints, Lacquers CAS No. NA - - DOT No. 1263 Substance No. (if available) 2628 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 66, 67, 70, ,	(Enter Code) Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 47 Conditions 01, 04 Location(s) Metalizing Dept. Paint Room
Substance Paints, Lacquers CAS No. NA - - DOT No. 1263 Substance No. (if available) 2628 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ,	Max. Daily 12 Avg. Daily 12 Days Onsite 230 (Actual Number)	Container 48 Conditions 01, 04 Location(s) Metalizing Dept. Flowcoaters
Substance Paints CAS No. NA - - DOT No. 1263 Substance No. (if available) 2628 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ,	Max. Daily 11 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 46 Conditions 01, 04 Location(s) Model Room
Substance Paints CAS No. - - DOT No. 1263 Substance No. (if available) 2628 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ,	Max. Daily 12 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 46 Conditions 01, 04 Location(s) Metalizing Dept. Spray Booth Room
Substance Waste Paint CAS No. - - DOT No. 1263 Substance No. (if available) 2628 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ,	Max. Daily 13 Avg. Daily 12 Days Onsite 300 (Actual Number)	Container 47 Conditions 01, 04 Location(s) Waste Storage Area
Substance Waste Paint CAS No. - - DOT No. 1263 Substance No. (if available) 2628 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ,	Max. Daily 11 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 47 Conditions 01, 04 Location(s) Metalizing Dept. Paint Storage Room
Substance Oxygen CAS No. 7782 - 44 - 7 DOT No. 1072 Substance No. (if available) 1448 Percent 60 (Code) State G (Code) Trade Secret ☐ (Check if claiming)	69, 70, ,	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 40 Conditions 2, 4 Location(s) Tool Room

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

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CHEMICAL INVENTORY PAGE

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IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Oxygen CAS No. 7782-44-7 DOT No. 1072 Substance No. (if available) 1448 Percent 60 (Code) State G (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 69, 70, ___, ___, ___	(Enter Code) Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 40 Conditions 2, 4 Location(s) Maintenance Dept.
Substance Naptha, solvent CAS No. NA-___-___ DOT No. 1256 Substance No. (if available) 2575 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ___, ___	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 48 Conditions 01, 04 Location(s) Parts washer in Tool Room
Substance Kerosene CAS No. 8008-20-6 DOT No. 1223 Substance No. (if available) 1091 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 70, ___, ___	Max. Daily 11 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 48 Conditions 1, 4 Location(s) Maintenance Dept.
Substance Hydrogen Peroxide CAS No. 7722-84-1 DOT No. 2984 Substance No. (if available) 1015 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, ___, ___, ___	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 01, 04 Location(s) Warehouse
Substance Hydrogen Peroxide CAS No. 7722-84-1 DOT No. 2984 Substance No. (if available) 1015 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, ___, ___, ___	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 01, 04 Location(s) Waste Treatment
Substance Hydrochloric Acid CAS No. 7647-01-0 DOT No. 1050 Substance No. (if available) 1012 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 68, ___, ___	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1, 4 Location(s) Plating Room
Substance Hydrochloric Acid CAS No. 7647-01-0 DOT No. 1050 Substance No (if available) 1012 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, 68, ___, ___	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1, 4 Location(s) Warehouse

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

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IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Ferrous Sulfate CAS No. 7720-78-7 DOT No. ____ Substance No. (if available) 931 Percent 60 (Code) State S (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 67 , ____ , ____ , ____ , ____	(Enter Code) Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 42 Conditions 1 , 4 Location(s) Warehouse
Substance Ferrous Sulfate CAS No. 7720-78-7 DOT No. 9125 Substance No. (if available) 931 Percent 60 (Code) State S (Code) Trade Secret ☐ (Check if claiming)	67 , ____ , ____ , ____ , ____	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 42 Conditions 1 , 4 Location(s) Waste Treatment
Substance Ferrous Sulfate CAS No. 7720-78-7 DOT No. 9125 Substance No. (if available) 931 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , ____ , ____ , ____ , ____	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 48 Conditions 1 , 4 Location(s) Waste Treatment
Substance Sodium Hydroxide CAS No. 1310-73-2 DOT No. 1823 Substance No. (if available) 1706 Percent 55 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , ____ , ____ , ____ , ____	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1 , 4 Location(s) Warehouse
Substance Sodium Hydroxide CAS No. 1310-73-2 DOT No. 1823 Substance No. (if available) 1706 Percent 55 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , ____ , ____ , ____ , ____	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1 , 4 Location(s) Waste Treatment
Substance Sodium Hydroxide CAS No. 1310-73-2 DOT No. 1823 Substance No. (if available) 1706 Percent 53 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , ____ , ____ , ____ , ____	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 48 Conditions 1 , 4 Location(s) Waste Treatment
Substance Cleaning Compound Corrosive CAS No NA - - DOT No 1760 Substance No (if available) 2254 Percent 53 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , ____ , ____ , ____ , ____	Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 48 Conditions 1 , 5 Location(s) Metalizing Stripping Room

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

PART 2
CHEMICAL INVENTORY PAGE

DEQ-094

IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Cleaning Compound Corrosive CAS No. NA - - DOT No. 1760 Substance No. (if available) 2254 Percent 55 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 67 , , ,	(Enter Code) Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 47 Conditions 1 , 4 Location(s) Metalizing Stripping Room
Substance Cleaning Compound Corrosive CAS No. NA - - DOT No. 1760 Substance No. (if available) 2254 Percent 55 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , , ,	Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 47 Conditions 1 , 4 Location(s) Warehouse
Substance Cleaning Compound Corrosive CAS No. NA - - DOT No. 1760 Substance No. (if available) 2254 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , , ,	Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 48 Conditions 1 , 5 Location(s) Plating Room Cleaner Tanks
Substance Sulfuric Acid CAS No. 7664 - 93 - 9 DOT No. 1830 Substance No. (if available) 1761 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , 68 , ,	Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 32 Conditions 1 , 4 Location(s) Warehouse
Substance Sulfuric Acid CAS No. 7664 - 93 - 9 DOT No. 1830 Substance No. (if available) 1761 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , 68 , ,	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1 , 4 Location(s) Waste Treatment
Substance Sulfuric Acid CAS No. 7664 - 93 - 9 DOT No. 1830 Substance No. (if available) 1761 Percent 53 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , 68 , ,	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 48 Conditions 1 , 4 Location(s) Waste Treatment
Substance Sulfuric Acid CAS No. 7664 - 93 - 9 DOT No. 1830 Substance No. (if available) 1761 Percent 53 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	67 , 68 , ,	Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 48 Conditions 1 , 4 Location(s) Plating Tanks

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

PART 2
CHEMICAL INVENTORY PAGE

DEQ-094

IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Sulfuric Acid CAS No. 7664-93-9 DOT No. 1830 Substance No. (if available) 1761 Percent 53 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 67, 68, ___, ___, ___	(Enter Code) Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 32 Conditions 1, 4 Location(s) Sanitary Sewer outside
Substance Sodium Bisulfite CAS No. 7631-90-5 DOT No. 2693 Substance No. (if available) 1685 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, ___, ___, ___	Max. Daily 11 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 32 Conditions 1, 4 Location(s) Plating Room
Substance Sodium Bisulfite CAS No. 7631-90-5 DOT No. 2693 Substance No. (if available) 1685 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, ___, ___, ___	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1, 4 Location(s) Warehouse
Substance Nickel Plugs CAS No. 7440-2-0 DOT No. NA Substance No. (if available) 1341 Percent 59 (Code) State S (Code) Trade Secret ☐ (Check if claiming)	67, ___, ___, ___, ___	Max. Daily 14 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 47 Conditions 1, 4 Location(s) Warehouse
Substance Nickel Plugs CAS No. 7440-2-0 DOT No. NA Substance No. (if available) 1341 Percent 59 (Code) State S (Code) Trade Secret ☐ (Check if claiming)	67, ___, ___, ___, ___	Max. Daily 12 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 47 Conditions 1, 4 Location(s) Plating Tanks and Plating Room
Substance Nickel Compounds NOS CAS No. ___-___-___ DOT No. ___ Substance No. (if available) 2875 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, ___, ___, ___	Max. Daily 14 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 32 Conditions 1, 4 Location(s) Warehouse
Substance Nickel Compounds NOS CAS No. ___-___-___ DOT No ___ Substance No. (if available) 2875 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67, ___, ___, ___	Max. Daily 14 Avg. Daily 14 Days Onsite 365 (Actual Number)	Container 48 Conditions 1, 5 Location(s) Plating Tanks

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

PART 2
CHEMICAL INVENTORY PAGE

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IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Nickel Compounds NOS CAS No. ___-___-___ DOT No. ___ Substance No. (if available) 2875 Percent 52 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 67	(Enter Code) Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 48 Conditions 1, 5 Location(s) Rinse Tanks
Substance Soda Lime CAS No. 8006-28-8 DOT No. 1907 Substance No. (if available) 2772 Percent 59 (Code) State S (Code) Trade Secret ☐ (Check if claiming)	66, 67	Max. Daily 13 Avg. Daily 13 Days Onsite 365 (Actual Number)	Container 42 Conditions 1, 4 Location(s) Warehouse
Substance Wax, Liquid CAS No. ___-___-___ DOT No. 1993 Substance No. (if available) 2854 Percent 55 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 47 Conditions 1, 4 Location(s) Warehouse
Substance Wax, Liquid CAS No. ___-___-___ DOT No. 1993 Substance No. (if available) 2854 Percent 55 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66	Max. Daily 12 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 47 Conditions 1, 4 Location(s) Plating
Substance Sodium Hypochlorite CAS No. 7681-52-9 DOT No. 1791 Substance No. (if available) 1707 Percent 54 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66, 67	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1, 4 Location(s) Outside Sanitary Sewer Treatment Plant
Substance Rodenticides, Solid, NOS CAS No. NA ___-___-___ DOT No. 1681 Substance No. (if available) 2752 Percent 61 (Code) State S (Code) Trade Secret ☐ (Check if claiming)	67	Max. Daily 11 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 41 Conditions 1, 4 Location(s) All over entire Facility
Substance Non Flammable Gas NOS CAS No. NA ___-___-___ DOT No. 1956 Substance No. (if available) 2590 Percent 61 (Code) State G (Code) Trade Secret ☐ (Check if claiming)	69	Max. Daily 11 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 40 Conditions 2, 4 Location(s) Air conditioning units all over Building

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

PART 2
CHEMICAL INVENTORY PAGE

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IMPORTANT!
Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Nitrogen, Compressed CAS No. 7727-37-9 DOT No. 1066 Substance No. (if available) 1375 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) , 69 , ,	(Enter Code) Max. Daily 14 Avg. Daily 13 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 40 Conditions 2 , 7 Location(s) Tank at rear of Building
Substance Motor Fuel, N.O.S. CAS No. NA - - DOT No. 1203 Substance No. (if available) 2569 Percent 61 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 , 67 , 70 ,	Max. Daily 11 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 46 Conditions 1 , 4 Location(s) Maintenance
Substance Natural Gas Compressed CAS No. 74-82-8 DOT No. 1971 Substance No. (if available) 2577 Percent 60 (Code) State G (Code) Trade Secret ☐ (Check if claiming)	66 , 70 , 69 ,	Max. Daily Avg. Daily Days Onsite 365 (Actual Number)	Container Conditions 2 , 4 Location(s) City Utilities
Substance 2-Butoxyethanol CAS No. 111-76-2 DOT No. 2369 Substance No. (if available) 0275 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 , 67 , 70 ,	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 47 Conditions 1 , 4 Location(s) Warehouse
Substance 2-Butoxyethanol CAS No. 111-76-2 DOT No. 2369 Substance No. (if available) 0275 Percent 59 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 , 67 , 70	Max. Daily 12 Avg. Daily 11 Days Onsite 365 (Actual Number)	Container 47 Conditions 1 , 4 Location(s) Outside Metalizing Stripping Room
Substance Adhesives, contain flammable liquid CAS No. NA - - DOT No. 1133 Substance No. (if available) 2067 Percent 61 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 , 67 , 70	Max. Daily 11 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 39 Conditions 1 , 4 Location(s) Model Shop
Substance Ammonia CAS No 7664-41-7 DOT No 1005 Substance No (if available) 0084 Percent 56 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 67	Max. Daily 10 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 38 Conditions 1 , 4 Location(s) Studio Copy Room

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FACILITY IDENTIFICATION AND SITE LOCATION

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GOODY PRODUCTS, INC.

969 NEWARK TURNPIKE KEARNY TOWN

PART 2
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Read all instructions before completing.
Please type all responses.

Reporting Period: January 1 - December 31, 1991

CHEMICAL DESCRIPTION	HAZARDS	Inventory (Ranges)	STORAGE CODES AND LOCATIONS
Substance Battery Fluid, Acid CAS No. NA - - DOT No. 2796 Substance No. (if available) 2153 Percent 61 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	(Codes for all that apply.) 66 . 67	(Enter Code) Max. Daily 12 Avg. Daily 11 Days Onsite 365 (Actual Number)	(Enter Codes, except Location(s); supply narrative.) Container 38 Conditions 1 . 4 Location(s) Warehouse, Battery Changing Station
Substance Cleaning Compound CAS No. NA - - DOT No. 1142 Substance No. (if available) 2253 Percent 61 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 . 67	Max. Daily 11 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 39 Conditions 1 . 4 Location(s) Everywhere
Substance Thinners CAS No. NA - - DOT No. 1760 Substance No. (if available) 2627 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 . 67 . 70 . . .	Max. Daily 10 Avg. Daily 10 Days Onsite 365 (Actual Number)	Container 46 Conditions 1 . 4 Location(s) Studio Model Room
Substance Thinners CAS No. NA - - DOT No. 1760 Substance No. (if available) 2627 Percent 60 (Code) State L (Code) Trade Secret ☐ (Check if claiming)	66 . 67 . 70 . . .	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 47 Conditions 1 . 4 Location(s) Metalizing Paint Store Room
Substance Cleaning Compound, Corrosive CAS No. NA - - DOT No. 1760 Substance No. (if available) 2254 Percent 54 (Code) State S (Code) Trade Secret ☐ (Check if claiming)	66 . 67	Max. Daily 13 Avg. Daily 12 Days Onsite 365 (Actual Number)	Container 32 Conditions 1 . 4 Location(s) 15 Gallon Plating
Substance CAS No. - - DOT No. Substance No. (if available) Percent (Code) State (Code) Trade Secret ☐ (Check if claiming)	. . . . . .	Max. Daily Avg. Daily Days Onsite (Actual Number)	Container Conditions . . Location(s)
Substance CAS No. - - DOT No. Substance No. (if available) Percent (Code) State (Code) Trade Secret ☐ (Check if claiming)		Max. Daily Avg. Daily Days Onsite (Actual Number)	Container Conditions . . Location(s)

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Exhibit 12

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Peter Schultz, Ph.D.
Newell Co.
4000 Auburn Street
Rockford, IL 61101

SEP 04 1996

RE: Remediation Agreement In the Matter of Goody Products, Inc.
(November 9, 1993 Remediation Agreement)
Goody Products Inc. (Goody Products)
Kearny, Hudson County
Remedial Action Workplan dated May 1996
ISRA Case #93466

Dear Dr. Schultz:

The New Jersey Department of Environmental Protection ("NJDEP") has completed its review of the proposed Remedial Action Workplan. Please be advised that the Remedial Action Workplan cannot be fully approved at this time because further delineation of the ground water is required. However, the soils portion can be conditionally approved as a Partial Remedial Action Workplan. Therefore, the Partial Remedial Action Workplan is hereby approved as conditioned below:

I APPROVED CLEANUP LEVELS

Soil Cleanup Criteria

The NJDEP uses the Soil Cleanup Criteria dated February 3, 1994 and published in the April 1994 issue of the *Site Remediation News* to determine when the soil remediation at a site is complete. A description of the procedures used for applying the Cleanup Criteria is found in the article entitled "Guidance for the Use of Soil Cleanup Criteria" in the *Site Remediation News*, Winter 1995, Volume 7 Number 1. These criteria will apply to the remediation of the Goody Products site.

II. Soil

The proposal to remove the hot spots, collect post-excavation samples and place capping on the property is generally acceptable. However, Goody Products is advised that for the areas where the delineation has not been completed before the excavation, further delineation, including offsite investigation, if necessary, will be required. In addition, Goody Products shall also evaluate the impact of the remaining contamination on the ground water.

Exterior Locations

AOC 1 - Wastewater Discharge Pit and Area South of Wastewater Discharge Pit

The proposed excavation area and the post-excavation sample locations are conditionally acceptable. Since both samples TP-25 and 56 detected lead above the non-residential cleanup criteria (600ppm), the excavation area shall extend to TP-25. In addition, since the vertical delineation has not been completed in this area, Goody Products shall collect post-excavation at the base of the excavation biased to the most contaminated locations. In addition, based on

the post-excavation samples, Goody Products shall propose to evaluate the impact of the metal contamination on the ground water.

AOC 2 - West Yard

Former Waste Discharge Pipe (KTP-1 Area/TP-27 Area)

The proposed excavation area is acceptable. However, since the delineation samples 73 through 75 were not analyzed for total petroleum hydrocarbons (TPH), the post-excavation sample analyses shall include TPH in addition to the proposed copper. Additionally, since the concentrations of toluene (1,400ppm) and xylene (6,000ppm) at location KTP-1 were above the impact to ground water criteria and the ground water table is shallow in this area, Goody Products shall propose to investigate the impact of this contamination on ground water.

Hazardous Waste Storage Area (HWSA) and Central West Yard

The proposed excavation area and the post-excavation sample locations are conditionally acceptable. Since sample TP-58 detected lead above the non-residential cleanup criteria (600ppm), the excavation area shall extend to TP-58. In addition, since the vertical delineation for volatile organic compounds (VO) has not been completed at GKW-2, Goody Products shall collect a post-excavation sample at the base of the excavation biased to GKW-2 for VO analysis. Goody Products shall also propose to investigate the impact of the VO contamination on ground water.

S-5 Area and SB-5 Area

The proposed excavation area and post-excavation sampling are acceptable.

TP-44 Area and TP-34 Area

The proposed excavation area and post-excavation sampling are acceptable.

TP-40/TP-31/TP-66/TP-67

The proposal to excavate these areas and collect five post-excavation samples from each excavation area is acceptable.

AOC 3 - North Yard

TP-72/TP-78 Area

The proposal to excavate these areas and collect four post-excavation samples from each excavation area is acceptable.

Heating System Condensate Blowdown Pipe Discharge Area (HSCP-9)

The proposed excavation area is conditionally acceptable. Based on the sampling results, sample location 45 contains the highest concentration of nickel. However, it is not clear if location 45 is included in the proposed excavation area. In addition, the proposal for not collecting post-excavation samples is not acceptable because the vertical and horizontal delineation for nickel at location 45 has not been completed. Therefore, Goody Products shall include location 45 in the excavation area and collect post-excavation samples at the base of the excavation biased to location 45 and from the eastern excavation sidewall.

Burnishing Room Pipes/Hoses Discharge Area

The proposed excavation area and post-excavation sampling are conditionally

acceptable. The post-excavation samples from the base and the sidewall of the excavation shall be biased to sample locations 27, 28 and 36, where nickel was detected over 10,000ppm.

Compressor Blowdown Pipe Discharge Area/TP-75 Area

The proposed excavation area and post-excavation sampling are acceptable.

AOC 4 - Dead Horse Creek

The proposal to remove the contaminated sediment within the property limits is conditionally acceptable. The upstream location (032296-85) at the north end of the creek within the property limits was detected with the highest concentration of nickel and no further sample in the northern direction of 032296-85 was collected. Therefore, the origin of stream contamination has not been determined. Since the discharge point of the former waste discharge pipe has not been located, Goody Products shall collect samples upgradient of 032296-85 to determine the most contaminated location. In addition, the delineation to the south of the creek has not been completed. Goody Products shall complete the delineation of the contamination in the creek before the dredging commences.

In addition, the proposal to redirecting the liquid to the stream is conditionally acceptable. Goody Products shall collect and analyze the liquid the metals and polyaromatic hydrocarbons. If the levels of contaminants exceed the surface water quality criteria, the liquid can not be redirected to the stream.

Building Interiors

1. The proposed interior excavation area is acceptable. However, if the contaminated soil could not be removed due to the possibility of jeopardizing the building foundation, Goody Products shall submit such evaluation report by a professional engineer.

2. Since the vertical delineation of the metal contamination in this area has not be completed and the ground water in this area is rather shallow, Goody Products shall propose to evaluate if the ground water quality is affected by the metal contamination and how the contaminated soil to be left on site will impact the ground water.

Capping

NJDEP will review the capping proposal upon receipt of Goody Products's complete design of the capping.

II GENERAL PARTIAL REMEDIAL ACTION WORKPLAN APPROVAL REQUIREMENTS

1. Goody Products shall submit a revised time schedule, within 15 calendar days of the receipt of this letter, in accordance with N.J.A.C. 7:26E-6.5 (a3) identifying the projected month and year for each task.

2. Goody Products shall comply with all federal, state, and local laws, regulations, and ordinances in implementing the approved Partial Remedial Action Workplan.

3. Goody Products shall obtain all federal, state, and local permits prior to implementation of the approved Partial Remedial Action Workplan. Should any condition or limitation in the permits be more stringent than those in the approved Partial Remedial Action Workplan, then the permit requirements shall supersede the terms of this approval.

4. Upon the written request by NJDEP, Goody Products shall submit for NJDEP review and approval any additional Site Investigation/Remedial Investigation Workplans deemed necessary by NJDEP during the implementation of a Partial Remedial Action Workplan to fully delineate the nature and extent of environmental contamination associated with Goody Products. Goody Products shall implement and complete any such additional Site Investigation/Remedial Investigation Workplans, and submit the results, in accordance with the time frames set forth in the approved additional Site Investigation/Remedial Investigation Workplan. Furthermore, if the remedial action does not satisfy the requirements of the Partial Remedial Action Workplan, Goody Products shall prepare and submit to NJDEP for approval any revisions to the Partial Remedial Action Workplan necessary to remediate any environmental contamination associated with Goody Products, or identified during the Partial Remedial Action Workplan implementation, by any additional sampling, or from any other source. Goody Products shall revise and submit the required information within a reasonable time not to exceed 30 calendar days from receipt of written notification from NJDEP.

5. The Industrial Site Recovery Act (ISRA) requirement for remediation of all environmental contamination associated with Goody Products and the terms and conditions of the approved Partial Remedial Action Workplan shall be binding upon Goody Products, and its officers, management officials, successors in interest, assigns, tenants, and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.

6. Goody Products shall collect all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the "NJDEP Field Sampling Procedures Manual".

7. Goody Products shall submit the results or additional workplans, in triplicate, in accordance with the approved schedule. Be advised that the next submission is due on February 30, 1997. Please note that only one copy of the Quality Assurance/Quality Control Deliverables is needed.

If modifications to the remedial schedule are anticipated during implementation of the referenced Partial Remedial Action Workplan, Goody Products shall submit a revised schedule. Based on a review of this schedule, the NJDEP will approve or disapprove the revised schedule. If the revised schedule is disapproved, the NJDEP will note the reasons for the disapproval.

8. Goody Products shall submit a final and any interim remedial action report in accordance with N.J.A.C. 7:26E-6.6.

9. On February 22, 1994, the New Jersey Department of Environmental Protection (NJDEP) promulgated the ISRA Fee Rule amendments at 26 N.J.R. 1142, which were proposed on April 5, 1993 at 25 N.J.R. 1375. Pursuant to the fee rule amendments, the NJDEP will bill an owner or operator according to the direct billing formula at N.J.A.C. 7:26B-1.10(f)2. At this time, the NJDEP intends to process bills on a semi-annual basis. The NJDEP encourages responsible parties to use the "Technical Requirements for Site Remediation" (N.J.A.C. 7:26E) as well as any other NJDEP guidance documents to assist in remediation activities and thereby minimize NJDEP review time. The complexity of the environmental contamination at the site and the quality of the workplans and reports submitted to the NJDEP will dictate the oversight costs to the regulated community.

III TIME SCHEDULE FOR IMPLEMENTATION OF APPROVED PARTIAL REMEDIAL ACTION WORKPLAN

1. Goody Products shall begin implementation of this Partial Remedial Action

Workplan according to the proposed remedial action schedule. If any delay or anticipated delay is or will be caused by events beyond the control of Goody Products, then Goody Products shall notify NJDEP in writing within 10 calendar days of the delay. Goody Products shall precisely describe the cause of the delay and request a schedule revision. Increases in the costs or expenses incurred in fulfilling the requirements contained in this letter shall not be considered a basis for an extension and such extension requests will not be granted.

NJDEP's approval, as conditioned above, is limited to the above referenced Partial Remedial Action Workplan only. This Partial Remedial Action Workplan approval shall not limit, restrict, or prohibit NJDEP from directing on-site or off-site cleanup, if deemed necessary by NJDEP, under any other statute, rule, or regulation. Goody Products is hereby required to fully implement the referenced Partial Remedial Action Workplan, as conditioned above, in accordance with the time schedule as set forth therein.

Please be advised that this approval does not represent a full Remedial Action Workplan Approval and, therefore, the Partial Remedial Action Workplan does not fully satisfy the requirements of N.J.A.C. 7:26B-5.3. By issuing this Partial Remedial Action Workplan Approval, NJDEP continues to reserve its right to pursue any penalties allowable under the law for violations of the ISRA statute or regulations associated with this transaction.

IV GROUND WATER REQUIREMENTS

Reviewing the activities conducted for the ground water investigation, NJDEP has the following comments:

1. Goody Products shall propose to investigate the oil-like sheen observed in the ground water table in the sampling location KTP-1 area. Although excavation will be conducted in this area, the contaminated soil may still remain underneath the adjacent building.

2. The PAH levels in soil samples TK-1, UST-2 and UST-W1, which are associated with the former UST location, are above the impact to ground water criteria, however, no monitoring wells are installed in this area. Therefore, Goody Products shall submit a proposal to investigate the impact of the PAH contamination on the ground water.

3. The proposal to conduct additional ground water sampling to determine current ground water quality conditions is acceptable. However, the procedures used to pump the monitoring wells is not acceptable. The wells should not have been pumped to dryness either during development, re-development or during purging. Goody Products shall follow NJDEP's "Field Sampling Procedures Manual" for guidance. In addition, it was not clear whether the wells were developed or purged. Goody Products shall clarify this discrepancy and reevaluate the well development, well purging and well sampling procedures in accordance with NJDEP's requirements.

4. In page 6.8, section 6.2.1. of the report, Goody Products stated that "calculated the distance separating the midpoint of the saturated screen length between each well". The meaning and the significance of this statement is not clear. Goody Products shall clarify the meaning of this statement and explain the use of the measurements.

4. According to Appendix C, "Contour Map Reporting Form" for April 3, 1996, wells PZ-2 and PZ-5D underwent a change in casing elevation in November 1995 due to repairs. The form directed a new "Well Certification Form B" for each well be attached, however, they were not included in the report. Goody Products shall submit the new "Well Certification Form B" for these two wells

in the next report.

5. Goody Products did not provide the information required in item II.3 of NJDEP January 16, 1996 letter. Goody Products shall submit the required information in the next report.

6. Goody Products has put off a full ground water investigation because of the tidal study. Goody Products shall implement all required actions in NJDEP January 16, 1996 letter as ground water investigation proceeds.

7. Goody Products used the term "soil horizon", which is not the standard term used by the USDA/SCS. NJDEP recommends that Goody Products define these "soil horizons" relative to their composition, thickness, distribution, the depth from ground surface if they intend to refer to the hydrologic properties of the horizons relative to ground water movement.

8. Goody Products did not include the April 1995 results in the Appendix B as stated. Goody Products shall submit the tabulated results in the next report.

9. Goody Products shall submit the above required information along with the June 1996 sampling results by September 30, 1996.

If you have any questions concerning the document, please contact the Case Manager, Yang Cao, at (609) 633-0753.

Sincerely,

Wayne C. Howitz, Assistant Director
Industrial Site Evaluation Element

c: John G. Valeri Jr. Esq., Riker Danzig et al
Jennifer Kohlsaat, Killam Associates
Michael Beard, Health Officer
Haydar Erdogan, BEERA
Robert Gordon, BGWPA

THIS AGREEMENT made the 26th day of May, in the year One Thousand Nine Hundred and Sixty-Six,

RTIES: BETWEEN: JERYL INDUSTRIES, INC., a New Jersey corporation with principal offices at 590 Belleville Turnpike, in the Town of Kearny, County of Hudson, and State of New Jersey, hereinafter referred to as the Landlord, and H. GOODMAN & SONS INC., a Delaware corporation with offices at 200 Varick Street, New York, N.Y. 10014, hereinafter referred to as the Tenant:

W I T N E S S E T H

EMISES ASED: Section 1. The Landlord has agreed to let and demise, and hereby does let and demise to the said Tenant, and said Tenant has agreed to hire and hereby does hire from the said Landlord, a complete building to be constructed by the Landlord in accordance with the preliminary plans and outline specifications hereto attached and marked Exhibit A, as amended in part by letter from Hertzberg and Cantor to Tenant dated May 18, 1966, hereto attached and marked Exhibit A-1 (it being recognized by both parties that said plans, even as so amended, are preliminary plans only; and that final plans, including additional detail drawings, are to be prepared, agreed upon, initialled by both parties, and thereafter regarded as substituted for such preliminary plans; and that more detailed specifications may be prepared, agreed upon, initialled by both parties, and thereafter regarded as additions to such outline specifications); and the surrounding land located on an industrial tract as shown on the plot plan attached hereto, made part hereof and marked Exhibit B, both constituting the demised premises, a legal description of which is hereto attached, made part hereof and marked Exhibit C. The building shall cover no less than 153,375 square feet of space (outside measurements).

Exhibit 13 b.

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TERM:

Section 2. The term of this lease shall commence on the first day of the month following the date when the Landlord's and Tenant's architects or engineers both certify, in writing, that the building and improvements thereon and the parking areas are fully completed, and are ready for occupancy by the Tenant, as stated below, and shall continue from said date for a period of twenty-five (25) years.

(A) Landlord and Tenant hereby agree to enter into and execute a Supplemental Agreement fixing said date of commencement of the term of this lease and the expiration date of the initial term thereof.

RENT:

Section 3.

IS AMENDED 4/12/67

(A) Tenant hereby covenants and agrees to pay to the Landlord the annual rent of $177,148.20 during the first twenty (20) years of the term of this lease, in equal monthly installments of $14,762.35; and the annual rent of $150,307.50 during the last five years of the term of this lease, in equal monthly installments of $12,525.62. All monthly installments are payable in advance on the first day of each and every month during the term hereof.

ADDED BY AMENDMENT 4/12/67

(B) Tenant has heretofore paid to the Landlord, and the Landlord hereby acknowledges the receipt of, the sum of $37,576.86, which sum shall be deemed rental payments in advance applicable to the first three monthly installments hereinabove provided in this Section.

WARRANTIES AND REPRESENTATIONS:

Section 4. The Landlord warrants and represents that there are no laws, ordinances, rules or regulations which prohibit, prevent or limit the full use of the demised premises by the Tenant for the conduct of its business, or for the uses hereinafter set forth.

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USE AND OCCUPANCY:

Section 5. Tenant shall use and occupy the premises for offices, warehouse, the manufacture and sale of hair care goods and all kinds of novelties made of cloth, metal, plastics and any and all other materials, the manufacture and sale of all other kindred items, and for the manufacture and sale of all other items and articles of all kinds and nature whatsoever, and for all other uses and purposes not prohibited by law.

CONSTRUCTION AND COMPLETION OF BUILDING:

Section 6. The Landlord agrees as follows:

(A) To complete all work required in connection with filling, grading, excavating and piling; to complete foundation, footings, roofing, plumbing below grade; to erect all structural steel; and to complete all prior operations in connection therewith, as required by the plans and specifications, by no later than the 15th day of October, 1966.

(B) To complete all masonry curtain walls, all exterior windows and doors; to erect and construct the entire roof, including the necessary flashing, so that the building is fully watertight and secure; to complete at least fifty (50) per cent of the floor slab (fully poured and finished); and to complete all prior operations thereto as required by the plans and specifications, by no later than the first day of January, 1967.

(C) To fully complete the building, all outside items, and all other work as shown by the plans and specifications, in all details and in all respects, by no later than May 1, 1967.

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(D) The work specified in paragraphs (A) and (B) shall be deemed completed only when the Landlord's architect or engineer and the Tenant's architect or engineer shall jointly certify, in writing, that such work has been so completed.

(E) The building, all outside items, and all other work shown by the plans and specifications, shall be deemed completed only when the Landlord's architect or engineer and the Tenant's architect or engineer shall jointly certify in writing, that they are fully completed, except for minor items, and are ready for occupancy by the Tenant; and Landlord procures and delivers to Tenant a Certificate of Occupancy or of completion from the Building Department having jurisdiction thereover, to permit the occupancy by the Tenant and the conduct of Tenant's business therein.

ASTE ISPOSAL:

Section 7. Landlord agrees as follows:

(A) To construct, erect, repair, and keep in repair, a proper, sufficient and legal septic tank and sewerage disposal system adequate for Tenant's disposal of waste and sewerage (both sanitary and industrial). The Landlord further agrees that if, at any time during the term of this lease, or any renewals or extensions thereof, any governmental agency shall require any other kind of sewerage disposal system, that the Landlord shall, at its own cost and expense, comply with all governmental rules, laws, regulations and requirements in connection therewith and, at its own cost and expense, will install another sewerage disposal system sufficient for the needs of the Tenant which meets such requirements, and/or will, at its own cost

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and expense, connect or hook-up such disposal system with any sewerage system constructed by any governmental agency and in compliance with government regulations. Tenant shall clean and maintain (but not repair) the septic tank, if it becomes necessary, and any sewer plant used solely by the Tenant.

(B) It is the intention of the parties hereto, and Landlord hereby agrees, that at all times during the term of this lease and any renewal or extension thereof, the Landlord will, at its own cost and expense, provide for the Tenant a sewerage disposal system which will be sufficient for the needs of the Tenant, and which system will comply with all governmental rules and regulations, and, further, that said system shall accommodate the disposal of all sanitary and industrial waste of the Tenant, and its 500 or more employees. Industrial waste shall be piped to Dead Horse Creek, as provided below.

(C) To divert Dead Horse Creek from its present course to a location outside of the demised premises, cause same to be properly constructed with sufficient pitch and depth so as to permit easy flow of water and waste contained or emptied therein and, if required by any governmental agency, to pipe the flow of water and waste in place and stead of maintaining an open ditch. If any governmental agency shall require the discontinuance of said creek for such use, then, and in such event, Landlord agrees, at its own cost and expense, to provide for and on behalf of the Tenant, a substitute disposal system which shall be adequate and sufficient for all uses and needs thereof by the Tenant. The use of Dead Horse Creek shall be limited to storm or surface waters and such effluents as will be discharged by the Tenant, provided, however, that the effluents discharged

by the Tenant shall be such as shall not be prohibited by any governmental agency of the State of New Jersey or any political sub-division thereof. If the effluents discharged by Tenant are so prohibited, Tenant will endeavor to treat the effluents at its own cost and expense so as to comply with the government regulations. If Tenant is not able to accomplish such treatment, in good faith, then Landlord and Tenant shall share equally the cost and expen of a suitable method of disposal of such effluents.

(D) Landlord agrees to comply with the provisions contained in paragraphs (A), (B), and (C) above, promptly and expeditiously. If the Landlord shall fail, neglect, or refuse to comply with and perform the provisions contained in those paragraphs, or shall fail to do so promptly and expeditiously, then, and in such event, the Tenant may do so and charge all costs and expense thereof to the Landlord, and deduct the amount thereof from rent due to Landlord, and if insufficient to repay the Tenant, then to hold the Landlord liable and responsible for any deficiency.

ADDED BY AMENDMENT 10/25/66

(E) In the event that Landlord provides a coverage posal plant for the disposal of Tenant's sanitary waste, coverage disposal plant shall, if so requested by Tenant, erected on the demised premises in a location agreeable t Tenant. Landlord shall have the right to construct the s age plant so that it serves others in common with Tenant In such event Tenant agrees to pay its proportionate shar maintenance costs of the plant, which costs, however, sh not include the costs of any repairs, replacements or re- building of said plant, all of which the Landlord agrees and bear the cost thereof.

RAILROAD SIDING:

Section 8. The Landlord agrees as follows:

(A) To furnish and construct, at its own cost and expense, for the use by the Tenant, a railroad siding from the main track of the Erie-Lackawanna Railroad Company to the demised premises and along the building, all as shown on the Plot Plan attached hereto and made a part hereof and marked Exhibit B, including grading, stone ballast, setting ties and tracks, and in compliance with all requirements of said railroad company in connection therewith.

(B) To enter into and execute any and all agreements required by the Erie-Lackawanna Railroad Company, and to pay all costs and expenses in connection therewith. Tenant hereby agrees to assign and transfer to the Landlord all road haul car refunds to which the Tenant may be entitled from the said railroad company under side track agreement, to the extent, however, of the amount of the total cost of installation, and thereafter, all refunds shall be paid to the Tenant.

REPAIR:

Section 9.

(A) Landlord hereby agrees, for a period of one (1) year from date Tenant takes full possession of the demised premises, at Landlord's sole cost and expense, to take good care of, and make all repairs to, the demised premises, all improvements, machinery and equipment installed by Landlord, both inside and outside, structural and non-structural, ordinary and extraordinary, foreseen and unforeseen, including, but not limited to, piling, footings, foundation, walls, floors, roof, heating system, electrical system, gas system, sprinkler system, septic tank, sewerage disposal system, paving to parking area, all entrances and exits; it being the express understandin that Tenant shall not be obligated to make any repairs to the [illegible] or to the outside thereof of any kind, [illegible] or nature whatsoever, during said [illegible] period.

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(B) [illegible] that [illegible] the first year as above provided, and except as provided in Paragraph (C) of this Section, throughout the term of this lease, and any renewal thereof, at its sole cost and expense, to take good care of and make all repairs to, only the inside of the demised premises.

ECTION 9(c) MENDED BY ONSENT JUDGMENT 9/24/74

(C) (1) Landlord agrees that throughout the term of this lease, and any renewal or extension thereof, it will, at its sole cost and expense, maintain and make all repairs, replacements, adjustments and corrections (such maintenance and other work hereinafter collectively referred to as "repairs") to the walls (both interior and exterior), floor, roof, paving, concrete work and drainage (including roof and storm drains and exterior drainage) of the demised premises; and make all repairs to the demised premises necessary to correct any condition which is the result of settlement. The provisions of this paragraph shall apply regardless of when during the term of this lease (including before or after September 24, 1974) and any renewal or extension thereof, the conditions requiring repairs arose.

(2) Tenant agrees to give Landlord at least ten days notice in writing of any required repairs except in the case of repairs which arise out of a sudden, unexpected or emergency condition which repairs may be performed by Tenant without any advance notice to Landlord, and except as otherwise provided in Section 9 (C) (3) below with respect to floor repairs. Landlord agrees to make the repairs which are Landlord's obligation under this lease expeditiously and with minimum disturbance to Tenant's operations. All repairs shall be performed in a good workmanlike manner. For the purposes of this paragraph, and not by way of limitation, all roof repairs shall be deemed to be repairs which arise out of a sudden, unexpected or emergency condition.

(3) Notwithstanding anything to the contrary contained in this Section, however, the parties agree as follows with respect to repairs to the floor:

(i) Landlord shall not be obligated to pay for floor repairs which involve mudjacking, soil stabilization, pressure grouting or raising the floor slab of any bay unless some portion of the floor of that bay is at least two inches below the top of the diamond-shaped portion of the floor at any corner column of the b[illegible] At least ten days before such repairs are begun, Tenant shall furnish Landlord with a statement from a surveyor or engineer licensed by the State of New Jersey identifying the floor bays to which Tenant intends to make such repairs and certifying that some portion of each such bay is at least two inches when measured as provided above. Such statement shall be deemed conclusive evidence of such condition.

(ii) Except for furnishing the surveyor's or engineer's statement de[illegible] in the next [illegible] ling paragraph, Tenant need not give [illegible] any [illegible] of repairs to [illegible] to the floor and shall have absolute discretion with

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respect to the type of repairs to be performed as well as who performs those repairs and when they are to be performed; and Landlord shall be obligated to pay for such repairs if the cost thereof does not exceed the aggregate monetary limits set forth below.

(iii) Between April 1, 1975 and September 30, 1981 Landlord shall not be required to pay more than the aggregate sum of $100,000.00 for floor repairs. On and after October 1, 1981 Landlord shall not be required to pay more than the aggregate sum of $100,000.00 for floor repairs. These aggregate sums apply regardless of when, during the term of this lease and any renewal or extension thereof, the conditions requiring floor repairs arose. However, such sums shall be applied only to floor repairs made after October 1, 1974. The balance of those aggregate sums remaining unutilized as of January 1 of each year, beginning in 1976, shall be recomputed each year by reference to the national "Wholesale Price Index, All Commodities" (the "Index") published by the Federal Bureau of Labor Statistics or any successor agency. Such unutilized balance shall be increased by the percentage, if any, by which the Index for the September immediately preceding the start of that calendar year exceeds the Index for August, 1974.

(iv) Landlord shall not be required to pay for any floor repairs necessitated solely by vibration of equipment attached to the premises by Tenant.

(4) Landlord agrees to pay to Tenant and save Tenant harmless of and from all losses, damages and expenses which Tenant may suffer or sustain by reason of settlement; and those suffered by Tenant due to water damage caused by seepage or leakage of the walls, roof or plumbing.

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(D) Landlord hereby agrees to indemnify and save harmless the Tenant of, from, and against all costs, expenses, liabilities, losses, damages, suits, fines, penalties, claims and demands, including reasonable counsel fees caused by, due to, arising out of or resulting from Landlord's failure to comply with the provisions contained in paragraphs (A) and (C) of this Section, and shall not call upon the Tenant for any disbursements or outlay whatsoever in connection therewith and hereby expressly releases and discharges Tenant of and from any liability therefor.

AMENDED CONSENT GMENT 24/74 9/24/

(E) In those instances when no notice from Tenant is required because the repairs are related to a sudden, unexpected or emergency condition, or in the case of repairs to the floor specifically covered by Section 9 (C) (3) above, or if Landlord should fail, neglect or refuse to make any other repairs which are its obligation under Section 9 (C) above after Tenant has given Landlord the notice required by Section 9 (C) (2), the Tenant may make such repairs and deduct the cost and expense thereof from the rent reserved herein to be paid by the Tenant to the Landlord. If Landlord should fail, neglect or refuse to pay the losses, damages and expenses described in Section 9 (C) (4) above, Tenant may deduct the amount thereof from the rent reserved herein to be paid by the Tenant to the Landlord. Deductions from rent under this Section 9 (E) shall be made monthly, in installments no larger than Three Thousand Five Hundred and Forty-five Dollars ($3545.00), or the difference between the rental reserved herein payable to Landlord and the average monthly payment due for principal and interest to any holder of a first mortgage on the demised premises, whichever is greater. However, no such deductions shall be made from rent payable for the months October 1974 through March 1975. Should such deductions be insufficient to reimburse Tenant in full, the Landlord shall, in addition, be liable and responsible for any deficiency.

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(F) Landlord agrees to give Tenant the benefit of all guarantees procured by Landlord from subcontractors or suppliers, and to enforce said guarantees on request of Tenant.

REAL ESTATE TAXES:

Section 10.

AS AMENDED BY CONSENT JUDGMENT 9/24/74

(A) Tenant shall pay all real estate taxes imposed upon the leased premises during the term of this lease and any renewals or extensions thereof, provided, however, that if the amount thereof during the first ten (10) years of the term hereof shall exceed an annual sum equal to seventeen and one half cents (17.5 per square foot of the land area covered by the original buildin then the Landlord agrees to pay such excess. For the purposes o this paragraph the first ten years of the term hereof shall be deemed to end on October 31, 1977.

AS AMENDED 10/25/66

(B) With respect to the original building erected and leased in accordance with Section 1, and only during the first ten (10) years of the term hereof, if the annual amount of all real estate taxes and assessments which Tenant is required to pay under this Section exceeds a sum equal to fifteen (15¢) cents per square foot of the land area covered by the original building, the Landlord agrees to pay such excess. If the Landlord fails to pay such excess, then the amount thereof may be deducted by the Tenant from any rent payable hereunder. Landlord shall not be required to pay any part of the real estate taxes on any additions to the original building which may be erected in accordance with Section 12.

(C) Landlord hereby agrees to apportion the demised premises for tax purposes so that the assessed value and the tax will be separately stated on one single tax bill. In the event, however, that the demised premises are assessed and taxed in conjunction with other premises owned by [illegible] then and in such event

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the Landlord shall pay the real estate taxes, including the taxes imposed on the demised premises, on the date when same become due and payable, and furnish to the Tenant a true copy of the entire tax bill which shall, nevertheless, show a separate tax for the building structure, for the purpose of determining the true and exact amount which is due and payable by the Tenant and which may be due and payable by the Landlord, as herein provided.

(D) Landlord agrees to furnish Tenant with all tax bills as soon as they are available and shall simultaneous therewith pay to the Tenant the amount which may be due from the Landlord, as provided for in paragraph (B) of this Section, and Tenant agrees to pay said taxes on or before the dates required for payment thereof by the Town of Kearny, without imposition of any interest or penalty charges thereon.

(E) Landlord and/or the Tenant shall have the right to file a timely appeal for a reduction of the assessed valuation and the Landlord agrees to join Tenant in any application, law suit or appeal for this purpose, and agrees to sign any and all documents which may be necessary or required to properly effectuate any such application, law suit or appeal for reduction of assessed valuation. After the first ten (10) years of the term of this lease, the cost of any proceeding to reduce the assessed valuation shall be borne by the Tenant.

(F) The real estate taxes for the calendar year in which the term of this lease commences, and in which occurs the expiration of the term or the last renewal or [illegible], shall be equitably apportioned.

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Section 11.

(A) The Tenant agrees that it shall procure and pay for, at its own cost and expense, fire insurance to cover the demised premises, containing a waiver of subrogation as against Landlord and/or Tenant, if obtainable, from a standard fire insurance company licensed to do business in the State of New Jersey. In the event that Tenant shall carry fire insurance in a Master Policy, then the Landlord will accept a certificate thereof in compliance with the above provision. Tenant shall further obtain public liability insurance for the benefit of the Landlord and Tenant in limits of no less than $100,000.00 for the injury or death of any one person, and $300,000.00 for injuries or death of any number of persons arising out of any one accident, and in an amount of not less than $50,000.00 for damage or injury to property. The proceeds of all fire insurance shall be payable to Tenant, to be used for restoration of any damage caused by fire.

(B) Tenant agrees to furnish to Landlord proof of payment of premiums for said insurance coverage upon written request by the Landlord.

ADDED BY AMENDMENT 10/25/66

(C) The amount of fire insurance which Tenant shall carry in accordance with this Section, shall be the full insurable value of the demised premises.

CTURE XPANSION:

Section 12.

(A) Landlord agrees that during the term of this lease, or any renewal or extensions thereof, it will, on request of Tenant, in writing, make additions, improvements and alterations to the demised premises, at the cost and expense of the Landlord. When Tenant requests any such additions, improvements and alterations, it shall submit to Landlord preliminary plans and specifications for such additions, improvements and alterations, whereupon the Landlord [illegible] and submit to the Tenant [illegible] detailed plans and specifications, together with the cost of complet[illegible] such additions, improvements and alterations [illegible]

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Thereupon the Tenant shall have sixty (60) days within which to advise the Landlord, in writing, whether Tenant is willing to have the calculation of rent under this Section and the calculation of purchase price under Section 25 based on such cost. If the Tenant is not so willing, and Tenant advises Landlord of a lower cost quoted in good faith by another contractor to perform the same work, Landlord shall be obligated to complete the requested additions, improvements and alterations, by using such other contractor or otherwise, expeditiously and without unreasonable delay.

(B) Upon completion of such additions, improvements and alterations, and the taking of possession by the Tenant, the annual rent shall be deemed increased by an amount equal to ten (10%) percent of the cost estimated by the Landlord or the cost submitted by Tenant whichever is lower, payable in equal monthly installments.

AS AMENDED 10/25/66

(C) In the event Landlord shall fail, neglect, or refuse to make the additions, improvements and alterations, as hereinabove provided, then it shall constitute a breach and violation of this lease on the part of the Landlord, and the Landlord shall be liable to the Tenant for all losses and damages sustained by the Tenant, due to, resulting from, or arising out of such breach and violation on the part of the Landlord. In addition, upon such breach, the Tenant may, at its option, construct and erect the requested additions, improvements and alterations, and charge all costs, expenses, fees and charges in connection therewith to the Landlord, who hereby agrees to pay same. If the Landlord fails to pay such sums, whether losses and damges or costs and expenses, the Tenant may do so, and deduct such sums and interest thereon, from the rent payable, or to become payable, by Tenant to Landlord under Section 3 of this lease, in monthly installments not to exceed Three Thousand Five Hundred Forty-Five Dollars ($3,545.00), or the difference between the rental received herein to the

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Landlord [illegible] the average monthly p[illegible]nt due for principal and interest to any holder of a first mortgage on the demised premises, whichever is greater; and no rent or other charges for such additions, improvements, or alterations shall be due or payable to the Landlord, until such construction costs are paid in full.

(D) The Landlord shall not be obligated to make any additions comprising less than 30,000 square feet of building area.

(E) The proceeds of any fire insurance on such additions, improvements or alterations shall be payable to Tenant if such additions, improvements, or alterations are constructed by the Tenant.

ADDED BY AMENDMENT 10/25/66

(F) Except as modified by this Section, the rights and obligations of both Landlord and Tenant under this lease with respect to the original building, shall apply also to any additions, improvements, and alterations to the demised premises made in accordance with this Section.

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Landlord [illegible] the average monthly p[illegible]nt due for principal, and interest to any holder of a first mortgage on the demised premises, whichever is greater; and no rent or other charges for such additions, improvements, or alterations shall be due or payable to the Landlord, until such construction costs are paid in full.

(D) The Landlord shall not be obligated to make any additions comprising less than 30,000 square feet of building area.

(E) The proceeds of any fire insurance on such additions, improvements or alterations shall be payable to Tenant if such additions, improvements, or alterations are constructed by the Tenant.

ADDED BY AMENDMENT 10/25/66

(F) Except as modified by this Section, the rights and obligations of both Landlord and Tenant under this lease with respect to the original building, shall apply also to any additions, improvements, and alterations to the demised premises made in accordance with this Section.

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LIEN OF MORTGAGE:

Section 13.

(A) This lease shall be subject and subordinate to any first mortgage that may hereafter affect the demised premises and which is given as security for a first mortgage loan placed by any bank, insurance company or trust company, which is authorized to make first mortgage loans in the State of New Jersey, in a sum not exceeding $1,500,000.00, and the recording of such mortgage shall have preference and precedence and be superior and prior in lien to this lease regardless of the date of recording, and the Tenant agrees to execute any such instrument without cost which may be deemed necessary or desirable to further effect the subordination of this lease to any such mortgage; provided, however that any such mortgage

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shall contain (a) a provision which shall be binding upon the mortgagee, its successors or assigns, that in the event of a foreclosure of said mortgage, it will not cut off this lease by such foreclosure but will cause the sale of the premises to be made subject to this lease, and (b) a further provision that the Tenant herein, its successors or assigns, shall, provided it shall pay the rent reserved herein, enjoy full and quiet possession of the demised premises; and further provided that such mortgage shall be for a term of no less than twenty (20) years, be self-liquidating, bear interest at the rate of not more than six and one-half per cent (6½%) per annum, that the combined annual payments of principal, interest and real estate taxes shall not exceed the annual rent reserved herein, payable by the Tenant to the Landlord, and shall contain a privilege of prepayment at any time after five years.

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Section 14. In the event that Landlord shall at any time fail to pay any installment of principal or interest or any other sum due on any loan secured by any mortgage now or hereafter placed on the demised premises, to which this lease may be subordinate as above provided, Tenant shall have the right to pay such principal, interest and other sums and to deduct the amount of such payment, with interest thereon from the date of payment, from the next succeeding rent which shall become due and payable, until Tenant shall have been fully reimbursed for such payment and interest.

PARTIAL OCCUPANCY:

Section 15.

(A) Tenant shall have the right, at any time during construction of the building, to enter upon the premises for the purpose of outfitting same and installing its equipment therein, without the payment of any rent for such use.

(B) During the construction of the demised premises, if Landlord has substantially completed, and made available to Tenant, at least 67,000 square feet of building area on the east side of the building to be erected by Landlord, and Tenant occupies any portion of such area for the conduct of its business, Tenant agrees to pay to Landlord for such occupancy, from the inception thereof to the date when the term of this lease commences, a sum equal to one-half the rent reserved herein and payable by the Tenant to the Landlord.

ESTRUCTION URING ONSTRUCTION:

Section 16. It is agreed that all risks of damage or destruction by fire or other casualty during construction and until the commencement of the term of this lease, shall be borne by Landlord.

ESTRUCTION Y FIRE OR THER ASUALTY:

Section 17.

(A) If the demised premises shall be so damaged by fire, the elements, war, insurrection, riot, public disorder or other unavoidable casualty, or any act, authorized or unauthorized, on the part of any governmental authority, other than taking by condemnation, as to be substantially destroyed, rendering the whole or a major portion thereof untenantable by Tenant for the conduct of its business, the Landlord shall be obligated, upon the request of the Tenant

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expeditiously to reconstruct and restore the demised premises to their original condition, or as nearly so as possible, and the rent during such period of restoration or reconstruction shall abate; or, at the option of the Tenant, this lease shall cease and come to an end and any unearned rent and taxes paid in advance by the Tenant shall be refunded and repaid to it by the Landlord. Notwithstanding anything to the contrary in this paragraph, if such destruction occurs during the last five years of the term of this lease, or any renewal period which has begun or for which Tenant is willing to obligate itself, then the Landlord shall not be obligated to restore or reconstruct.

(B) In case of any lesser damage or destruction of the demised premises due to such causes, then the said premises shall be promptly restored by the Landlord to their previous condition and a just proportion of the rent herein reserved, according to the extent to which they have been rendered untenantable, shall abate until the said premises have been so restored and put in proper condition for use and occupancy. If Landlord shall, for any reason fail to so restore the premises or other portions of the building or buildings, or the improvements, machinery, fixtures and equipment, within a reasonable time after notice from Tenant to Landlord, Tenant may, but shall not be obligated to, make the repairs on behalf of the Landlord and charge the cost and expenses thereof against rent then due or which may become due under the terms of this lease.

(C) If any of the insurance proceeds for any loss by fire or other casualty is paid to the Landlord, the

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Landlord shall use such proceeds to pay the cost of restoration of the demised premises.

(D) In the event that any governmental authority having jurisdiction (1) shall require that said building should be demolished or removed or vacated as unsafe, or (2) shall prohibit the use of said premises for the conduct of Tenant's business, or (3) shall require alterations, structural replacements or additions to the building (except those based on the conduct of Tenant's business) Landlord hereby agrees to promptly commence and diligently complete the same. If Landlord fails to do so, then Tenant may terminate this lease by notice to Landlord in which case any unearned rent and taxes paid in advance shall be refunded to it by the Landlord, or the Tenant may, at its option, make the required alterations, structural replacements or additions to the building, and charge the cost and expenses thereof against the rent then due or which may become due under the terms of this lease.

DEMNATION: Section 18.

(A) In the event that the demised premises or any part thereof are taken or condemned for a temporary or permanent public or quasi-public use to such an extent that, in Tenant's sole discretion, the premises remaining are not suited for Tenant's use, Tenant may, at its option, terminate this lease and in such event any unearned rent and taxes paid in advance shall be refunded and repaid to Tenant by Landlord, but nothing herein contained shall be deemed to prevent Tenant from recovering against anyone other than Landlord, any damages sustained by Tenant due to

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such taking, [illegible]cluding the value of the Leasehold. If Tenant does not exercise its option to terminate this Lease, as provided in this paragraph, a just proportion of said rent according to the nature and extent of the taking shall be abated for the remainder of said term and Landlord shall put the remainder of the demised premises in proper condition for use and occupancy.

(B) Landlord shall, from any condemnation award received, pay to Tenant the amount by which the award was increased by reason of any improvements, alterations, and additions made in accordance with Section 12 and for which Tenant has not been reimbursed, and the cost to Tenant of moving and for Tenant's leasehold interest.

(C) Landlord shall not accept any award of damages without giving Tenant thirty (30) days notice of the amount of the proposed award and, if Tenant so requests within the thirty (30) days, reasonable opportunity to contest the same at Tenant's cost and expense, or Tenant shall have the right to file, assert and make a claim on its own behalf for an award to cover its cost for all additions, fixtures, machinery, equipment, alterations, and improvements which it had made or installed on the premises, and for its leasehold interest.

ADDED BY AMENDMENT 10/25/66

(D) Notwithstanding anything to the contrary contained in this Section, Tenant shall not have the right to terminate this lease unless there is a permanent taking or a permanent condemnation of at least ten percent (10%) of the building area or at least ten percent (10%) of the unimproved land area.

TERATIONS D IN-ALLATIONS TENANT:

Section 19. Tenant is hereby given the right and privilege to make such alterations, installations, and improvements, structural or otherwise, as Tenant may, from time to time, deem necessary and advisable for the conduct, management [illegible] of its business, at any time during the [illegible] this lease or any renewal or extension

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thereof. Such alterations, installations and improvements shall remain the property of the Tenant, and Tenant shall have the right to abandon same at the expiration of the term of the lease or remove same. In the event Tenant elects to remove same, it shall repair any damage to the building caused by such removal. No additional rent of any kind will be due from Tenant by reason of any alterations, installations, or improvements made by Tenant at Tenant's own cost and expense.

TRADE FIXTURES:

Section 20.

All machinery, movable partitions, fixtures, equipment, etc. installed in the demised premises, at the Tenant's expense, shall remain the property of the Tenant and may be removed by the Tenant. The Tenant shall, however, repair any damage caused directly and exclusively by said removal, and fixtures remaining in the premises after expiration of the term of this lease or any renewal or extension thereof, for a period of forty-five (45) days, shall be deemed abandoned, unless such period of time shall have been extended by the Landlord.

COMPLIANCE WITH GOVERNMENTAL REGULATIONS:

Section 21.

(A) The Landlord shall promptly execute and comply with all statutes, ordinances, rules, orders, regulations and requirements of the Federal, State and Municipal Government and of any and all their Departments and Bureaus, applicable to said premises, for the correction, prevention and abatement of nuisances, violations or other grievances, in, upon or connected with said premises during said term or any renewals or extension thereof; the

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Landlord shall also promptly comply with and execute all rules, orders and regulations of the Board of Fire Underwriters, or its equivalent, for the prevention of fires, at its own cost and expense. Tenant shall comply with all governmental rules and regulations with regard to the conduct of its business, unless structural changes are required as provided in paragraphs (A) and (C) of Section 9, in which case it shall be the obligation of the Landlord to so comply.

(B) If the Landlord or Tenant shall fail or neglect to comply with the aforesaid statutes, ordinances, rules, orders, regulations and requirements, or any of them, as either party may be required by the next immediately preceding paragraph or elsewhere in this lease, then the Landlord or Tenant, as the case may be, may comply with any and all of the said statutes, ordinances, rules, orders, regulations and requirements, at the cost and expense of the other party. In the case of the Landlord's failure to pay therefor, the said cost and expenses may be deducted by the Tenant from rent due or which may become due under this lease.

(C) The Landlord or Tenant, as the case may be, shall have the right to protest, in good faith, the compliance with any applicable statute, ordinance, order, or regulation, without violating the terms of this Section.

INS:

Section 22.

The Tenant may, at its sole option and discretion erect, construct and maintain any sign or signs, which it may deem necessary or advisable in, on, or about the demised premises including the roof thereof.

(A) [illegible] Landlord agrees to grant a perpetual easement for ingress and egress over the proposed Dolores Drive, as it appears on the plot plan hereto attached and marked Exhibit B, in form and substance agreeable to the Tenant and to keep same in full force and effect at all times.

(B) The Landlord agrees to keep said Dolores Drive unobstructed, clean, free of ice and snow, and in good order and repair at all times during the term of this lease and any renewals or extensions thereof.

AMENDED 24/67

(C) Landlord did, by indenture dated May 10, 1966, obtain from Public Service Electric and Gas Company, a permanent easement for the construction and maintenance of two roadways, one of which is to lead to the said Dolores Drive; and, by agreement dated March 20, 1967 Landlord did obtain from Public Service Electric and Gas Company an easement to construct and maintain an additional roadway from Newark Turnpike to the premises herein demised; and by lease dated April 25, 1967 leased from Public Service Electric and Gas Company the remainder of its eighty (80) foot wide Right of Way adjoining the demised premises on the south to be used for landscaping, paving, vehicular parking and the erection of two (2) bus stop shelters. In connection with said indenture, agreement, and lease, the Landlord agrees to fully comply with and perform all of the terms, covenants, conditions, provisions and obligations therein contained on its part to be done and performed; and the Tenant agrees to pay the monthly rent of $50.00 required by the said lease dated April 25, 1967.

The Landlord hereby grants to the Tenant the absolute and exclusive right to use the said additional r[illegible] described in the said agreement dated March 20, 1967, and the portion of the eighty

(80) foot wide Right of Way described in said lease dated April 25, 1967. Landlord hereby agrees that in the event that Tenant exercises the Option to Purchase the premises herein demised set forth in Section 25 of this lease, the deed of conveyance by Landlord to Tenant shall also convey Landlord's present right, title, and interest in and to the said additional roadway and the said portion of the eighty (80) foot wide Right of Way and also that in such event Landlord will assign to Tenant the said lease dated April 25, 1967 in a manner and form acceptable to both Public Service Electric and Gas Company and Tenant.

AS AMENDED 11/24/67

(D) Landlord did, on the 25th day of May 1966, obtain from the New Jersey State Highway Department an "Access Permit" bearing No. 2-E 44-66 (7) 0910000, authorizing access from Belleville Turnpike (New Jersey Route No. 7) to Dolores Drive; and did, on the 5th day of November 1964, and the 26th day of September 1967 obtain from the Hudson County, New Jersey, County Engineer permission for road openings from Newark and Jersey City Turnpikes to the said Dolores Drive and to the premises herein demised. Landlord agrees to fully comply with and perform all of the terms, covenants, conditions, provisions and obligations contained in those access permits on the part of Landlord to be done and performed, in order to keep the rights so given in full force and effect throughout the terms of this lease and any renewal or extension thereof.

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(c) The parties hereto have entered into an agreement creating a perpetual easement over the aforementioned Dolores Drive, as more fully described in such Easement Agreement, and on the terms and conditions more particularly provided therein. In connection therewith, the Landlord agrees as follows:

(1) In the event Landlord shall fail, neglect, or refuse to fully comply with and perform any or all of the conditions and provisions contained in paragraphs numbered "1" through "7" inclusive, in said Easement Agreement then, and in such event, Tenant may, but shall not be obligated to, comply with and perform any or all of such conditions and provisions, on behalf of Landlord.

(2) Landlord agrees to pay to Tenant all losses, damages, liabilities, costs and expenses, including reasonable counsel fees, which Tenant may suffer, sustain, or incur in so complying with and performing, on behalf of Landlord, any of the conditions andprovisions contained in such Easement Agreement.

(3) Tenant may charge any sum or sums due it in accordance with the next immediately preceding paragraph against, and deduct such sum or sums from, any rent or other sums which may be due and payable by Tenant to Landlord. Such deductions, however, shall be made in monthly installments not to exceed Three Thousand Five Hundred Forty-Five Dollars ($3,545.00) or the difference between the rental reserved in this lease to the Landlord and the average monthly payment due for principal and interest to any holder of a first mortgage on the demised premises, whichever is greater.

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OPTION TO RENEW:

Section 24.

(A) Landlord hereby gives and grants to Tenant the option to renew or extend lease for any one or more of four (4) additional consecutive periods of five (5) years each, upon the same terms and conditions herein set forth, except for the amount of rent (including the right of Tenant to remove its trade fixtures and improvements as herein provided), provided written notice by Tenant electing to exercise any such option is given to the Landlord, by certified mail, not less than six (6) months prior to the expiration of the term of this lease, or in the event of any subsequent renewal, not less than six (6) months prior to the expiration of each renewal term.

(B) The rent for such renewal period shall be 85¢ per square foot of the land area actually covered by the original building, and, in addition thereto, a sum equal to 13% less than the rental set under Section 12 hereof, for any additional building or buildings that may have been erected in accordance with said Section 12.

OPTION TO PURCHASE:

AS AMENDED 11/24/67

Section 25.

(A) Tenant is hereby given the right and option, after the first ten (10) years of the original term of this lease, and at any time during any renewal or extension thereof, to purchase the demised premises for the price computed as hereinafter set forth and on the following terms and conditions.

(1) Tenant must notify the Landlord of its election to purchase the demised premises by notice, in writing, sent by certified or registered mail to the Landlord.

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(2) Landlord shall convey, by a barga and sale deed with covenants against grantor's ac a good, marketable and insurable title without an exceptions or objections, except only as may be s on Title Report of the Commonwealth Land and Titl Company as of the date of the commencement of the term of this lease.

(3) Tenant shall pay all cash over an above the then remaining balance on any then exis first mortgage, the terms and conditions of which shall be agreeable to Tenant.

(4) The transaction shall be consumma and title conveyed, within sixty (60) days after Tenant's election to purchase same, and Tenant ma take title in the name of any assignee or designe

(5) The total price which Tenant shall pay for the demised premises (not including any additional building or buildings which may have b erected pursuant to Section 12 of this lease) sha be the sum of One Million Seven Hundred Thousand Dollars ($1,700,000.00) plus the figure appearing the chart below opposite the time period closest the date Tenant exercises this Option. The time periods on the chart below refer to the time that has elapsed from the commencement of the term of this lease:

10 Years	$131,880.99
10 Years and 6 months	127,149.19
11 Years	122,258.48
11 Years and 6 months	117,203.52
12 Years	111,978.78
12 Years and 6 months	106,573.56
13 Years	100,[illegible]
13 Years and 6 months	95,[illegible]

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14 Years	$89,265.11
14 Years and 6 months	83,102.04
15 Years	76,731.98
15 Years and 6 months	70,147.98
16 Years	63,342.86
16 Years and 6 months	56,309.17
17 Years	49,039.25
17 Years and 6 months	41,525.17
18 Years	33,758.73
18 Years and 6 months	25,731.45
19 Years	17,434.57
19 Years and 6 months	8,859.03
20 Years	1,501.39
After 20 Years	NONE

(B) In the event that any additional building or buildings have been erected pursuant to Section 12, thereof, prior to the time when the Tenant shall have exercised the right and option to purchase set forth in this Section, then the purchase price shall be increased by the cost of such additional building or buildings used to fix the rent of such additional building in accordance with said Section 12 plus ten (10%) percent of such cost, less 5% annual depreciation.

(C) The Landlord hereby agrees that if the Tenant exercises its option to purchase the demised premises, as set forth in this Section, the Landlord will comply with, perform, and abide by the terms and conditions contained in this Section. If the Landlord fails to do so, Tenant shall have all the rights and remedies provided in law and in equity, to compel performance, including the remedy of specific performance, and to recover all losses and damages sustained by Tenant by reason of the failure or refusal by the Landlord to so comply.

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AS AMENDED 11/24/67

(D) The purchase prices fixed in paragraphs (A) and (B) of this Section are based on the physical condition of the demised premises as of the date of the commencement of the term of this lease with respe to the original building, and as of the date full rental commences on any additional buildings erected pursuant to Section 12 of this lease. In the event such physical condition shall change by reason of, due to, or resulting from destruction by fire or other casualty, or by reason of condemnation, or otherwise, then in such event the parties hereto shal using as a base the purchase price computed in accordance with paragraphs (A) and (B) of this Sectic negotiate for a reduced price by reason of such changed condition, and failing to mutually agree upon such reduced price, the parties agree that the disput shall be expeditiously submitted to arbitration as herein provided.

ADDED BY AMENDMENT 10/25/66

(E) In the event Tenant exercises the option to purchase provided in this Section, the deed of conveyance shall provide that it is not intended by the parties her thereby to merge the Tenant's leasehold interest with th fee of the demised premises. This provision with respec to non-merger is for the purpose of insuring the holder any first mortgage on the demised premises that the lea obligation will continue in full effect notwithstanding such conveyance. The Tenant, however, shall have the to designate any person, firm, or corporation, to take title and become the grantee in such deed of conveyance subject to Tenant's leasehold interest.

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Section [illegible]

(A) In the event that the Landlord shall decide to sell the demised premises to a person other than the Tenant during the term of this lease or any renewal or extension thereof, Tenant shall have the following options:

(1) Not to purchase; or

(2) To exercise the Option to Purchase set forth in Section 25, even if the Landlord's decision to sell to such other person occurs during the first ten (10) years of the term of this lease; or

(3) To purchase the premises at the same price and on the same terms and conditions offered by said other person in good faith.

(B) Landlord shall, upon receipt of a bona fide offer from such other person, furnish a true copy thereof to the Tenant, who shall then have thirty (30) days within which to exercise either of the three (3) options contained in this Section.

(C) In the event Tenant shall decide not to purchase or not to exercise any of said options, and Landlord shall fail to consummate the sale with the bona fide offeror, then and in such event the Option to Purchase set forth in Section 25, and the Option of First Refusal set forth in this Section, shall be and remain in full force and effect.

(D) In the event that the Landlord sells the demised premises during the term of this lease, or any renewal or extension thereof, the Option to Purchase by the Tenant set forth in Section 25 herein, and the Option of First Refusal set forth in this Section shall, nevertheless, continue, remain in full force and effect, and shall be binding upon each and every purchaser during the entire term of this lease and any renewal or extension thereof.

(E) Any sale of the demised premises, to any purchase shall, further, be expressly made subject to this lease.

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ADDED BY AMENDMENT 10/25/66

(F) Notwithstanding anything to the contrary contain in this Section, Tenant waives the right of first refusal in the event of a foreclosure by the holder of a first mortgage on the demised premises, provided, however:

(1) that any such sale is made expressly subject to this lease agreement; and

(2) that the right of first refusal contained in this Section shall remain, continue and be binding upon any purchaser upon such foreclosure, whether it be the holder of the first mortgage or any other person, firm, or corporation, and upon such purchaser's legal representatives, successors and assigns.

SSIGNMENT ND SUB-ETTING:

Section 27. Tenant shall have the unlimited right to assign this lease and all the rights of Tenant hereunder and/or to sublet any part or all of the premises, without Landlord's consent, provided only that Landlord shall be given written notice of any assignment, and the effective date thereof, within thirty (30) days after the execution of such assignment. Tenant may sell, assign, transfer or hypothecate this lease without requiring the consent of the Landlord.

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Notwithstanding anything to the contrary contained in this Section, Tenant shall remain primarily liable on the lease obligations.

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OFFENSIVE AND OBNOXIOUS NEIGHBORS:

Section 28. Landlord is the owner of adjoining and adjacent property and it agrees not to sell, lease, rent or in any other manner permit the occupancy of all or any part of said property to or by any person, firm or corporation who will use same in a manner which will create obnoxious and/or offensive smoke, fumes, odors, hazardous health conditions or in any othermanner endanger the health and safety of the Tenant, its servants, agents, and employees, or adversely affect the use of the demised premises by Tenant for the normal operation of its business or any other permitted use of the demised premises.

UTILITIES:

Section 29. The Tenant shall, during the term of this lease, and any renewal or extension thereof, pay or cause to be paid, to the appropriate utility company, all charges for gas, electricity, heat, power, water, and telephone, used, rendered or supplied upon or in connection with said premises and any part thereof.

INSPECTION BY LANDLORD:

Section 30. The Tenant agrees that Landlord and its agents, and other representatives, shall have the right to enter into and upon the demised premises, or any part thereof, during business hours,by pre-arrangement, and only in the presence of an officer of the Tenant or a designated agent, for the purpose of examining the same, or making such repairs or alterations therein as may be necessary for the safety and preservation thereof, or as may be required by the terms of this lease, but at a minimum of disturbance

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to the Tenant and without disturbing the conduct of the business of the Tenant.

QUIET ENJOYMENT: Section 31. The Landlord covenants and agrees that Tenant shall, at all times during the term of this lease and any renewal or extension thereof, peaceably and quietly enjoy the premises hereby demised.

RE-LETTING: Section 32. The Tenant agrees that during the last six (6) months of the term or, if renewed or extended, during the last six (6) months of any additional term, it will permit the Landlord or its agents to show the premises to persons wishing to hire or purchase the same; and the Tenant further agrees that during the last six (6) months of the term hereby granted or any additional term, the Landlord or its agents shall have the right to place notices in front of said premises, or any part thereof, offering the premises "TO LET" or "FOR SALE", and the Tenant hereby agrees to permit the same to remain thereon without hindrance or molestation, provided such notices do not unduly obstruct the front of, or interfere with Tenant's use of, the demised premises and any additions thereto.

ARBITRATION: Section 33. Any differences or disputes which may arise between the parties shall be submitted to the American Arbitration Association for decision or award and both parties agree to be bound by any such decision or award. In the event that the said American Arbitration Association shall not then function or be willing to undertake said arbitration, then each of the parties shall select an arbitrator and the two arbitrators shall select a third

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arbitrator and the decision or award of the majority of said three arbitrators shall be binding and conclusive on both parties hereto.

SHORT FORM LEASE:

Section 34. The parties hereto agree to execute a short form lease or memorandum of lease, for recording purposes, in form and substance agreeable to the Tenant and complying with any statutes relating to the recording of leases. Such instrument shall be recorded in the office of the Clerk of Hudson County, New Jersey at the expense of the Tenant.

DEFAULT BY TENANT:

Section 35. Anything herein contained to the contrary notwithstanding, it is expressly understood and agreed that the Tenant shall not be deemed in default under any of the terms, covenants, conditions and provisions of this lease unless the Landlord shall have first given to the Tenant written notice of any claimed default, by certified mail, specifying in said notice, in detail, the nature of any of such claimed default, and not until Tenant shall have had a reasonable opportunity to cure same; and it is further agreed, that upon the expiration, of the term of this lease or the last renewal or extension thereof, Tenant shall be liable only for damage to the demised premises caused by the unauthorized used thereof or caused by the removal of alterations, installations and improvements in accordance with Sections 19 and 20.

AST SENTENCE DDED BY AMENDMENT 10/25/6.

If Tenant is held to be in default under this lease by a Court of competent jurisdiction in a final adjudication, or in an adjudication from which no appeal is taken, Tenant shall remain liable for any rental deficiency, but shall have a reasonable time after such final adjudication, or after the time within which such an appeal [illegible] taken, within which to cure such default.

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CERTIFICATES: Section 36

(A) The Landlord shall, without charge, at any time and from time to time, but not more frequently than three (3) times in any period of twelve (12) calendar months, within ten (10) days after request by Tenant, certify by written instrument, duly executed, acknowledged and delivered, whether Tenant has or has not, as the case may be, faithfully and fully made all payments then and theretofore due to Landlord and whether Landlord knows or does not know, as the case may be, of any default by Tenant in the performance by Tenant of all covenants, conditions and agreements on Tenant's part to be performed

(B) Tenant shall, without charge, at any time and from time to time, but not more frequently than three (3) times in any period of twelve (12) calendar months, within ten (10) days after request by Landlord, certify by written instrument, duly executed, acknowledged and delivered, whether Landlord has or has not, as the case may be, fully and fairly complied with the terms of this lease.

STRICT PERFORMANCE: Section 37. The failure of either party to insist upon strict performance of any of the covenants, terms, or conditions of this lease, or to exercise any option herein conferred on it in any one or more instances, shall not be construed as a waiver or relinquishment for the future, of the strict performance of any such covenants, conditions or options.

NOTICES: Section 38. All notices, demands and requests required under this lease shall be in writing. All such notices, demands and requests shall be deemed to have been properly given if served personally, or if sent by certified or registered mail, postage prepaid, addressed to Landlord or to Tenant at the addresses given herein, or to any other addr[illegible] [illegible]nated by either party.

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PERSONS BOUND:

Section 39. The parties hereto agree that this lease and the covenants and agreements herein contained are binding upon, and shall inure to the benefit of, the parties hereto and their legal representatives, successors and assigns.

IN WITNESS WHEREOF, the said parties have caused these presents to be signed by their proper corporate officers thereunto duly authorized, and caused their corporate seals to be hereto affixed, the day and year first above written.

ATTEST:

Dolores Turco

Dolores Turco, Secretary

JERYL INDUSTRIES, INC.

By

Jerry Turco, President

ATTEST:

Jacob Goodman, Secretary

H. GOODMAN & SONS, INC.

By

Leonard Goodman, Vice-Pres.

STATE OF NEW YORK
COUNTY OF NEW YORK SS:

On this 24 day of May, 1966 before me personally came JERRY TURCO, to me known, who, being by me duly sworn, did depose and say that he resides at No. 54 ENGLEWOOD STREET, NUTLEY, NEW JERSEY. that he is the president of Jeryl Industries, Inc., the corporation described in and which executed the foregoing Lease as Landlord; that he knows the seal of said corporatio that the seal affixed to said Lease is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that he signed his name thereto by like order.

Notary Public - New York Cou

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STATE OF NEW YORK
COUNTY OF NEW YORK SS:

On this 26th day of May, 1966 before personally came LEONARD GOODMAN, to me known, who, being by me duly sworn, did depose and say that he resides at No. 1 Cove Lane, in the village of Kings Point, New York, that he is the vice-president of H. GOODMAN & SONS, INC., the corporation described in and which executed the foregoing Lease as Tenant; that he knows the seal of said corporation; that the seal affixed to said Lease is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that he signed his name thereto by like order.

Notary Public - New York County

SOL BERNBAUM
NOTARY PUBLIC, State of New York
No. [illegible]
Qualified in Kings County
Commission Expires March 30, 1967

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EXHIBIT C.

LEGAL DESCRIPTION

BEGINNING at the intersection of the westerly line of the Belleville Turnpike with the southerly line of the Erie - Lackawanna Railroad (Old Newark Branch) and running thence (1) southerly along the westerly line of the Belleville Turnpike South 40 degrees 14 minutes 37 seconds East 195.00 feet to a point of curve, thence (2) on a curve to the Southwest with a radius of 25.00 feet, an arc distance of 39.27 feet, thence (3) South 49 degrees 45 minutes 23 seconds West along the northerly line of a private road 108.52 feet to a point of curve, thence (4) on a curve to the left having a radius of 255.00 feet, an arc distance of 157.63 feet, thence (5) and still along the private road South 14 degrees 20 minutes 21 seconds West 186.14 feet to the northerly right-of-way line of the Public Service Electric and Gas Company, thence (6) along the aforesaid right-of-way line North 75 degrees 39 minutes 39 seconds West 745.00 feet, thence (7) North 14 degrees 20 minutes 21 seconds East 512.77 feet to the southerly line of the Erie-Lackawanna Railroad property, and thence (8) along the railroad line South 80 degrees 25 minutes 09 seconds East 692.55 feet to the westerly line of the Belleville Turnpike and the point and place of BEGINNING.

Containing 9.65 acres.

BEING situate in the Town of Kearny, Hudson County, New Jersey.

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EXHIBIT 14d.

CT CORPORATION SYSTEM

Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801
Tel. 302 777 0205
Fax 302 655 5049

January 14, 1997

Dear Ms. Maddox:

RE: GOODY PRODUCTS, INC.

Pursuant to instructions received, we enclose one plain copy of Restated Certificate of Incorporation and all subsequent documents for the above company.

We appreciate this opportunity to have been of service to you.

Very truly yours,

Daniel J. Murphy
Technical Specialist

lk
Enc.

Ms. Linda Maddox
Newell
4000 Auburn Street
Rockford, Illinois 61101

FEDERAL EXPRESS

RESTATED

CERTIFICATE OF INCORPORATION

OF

H. GOODMAN & SONS, INC.

H. GOODMAN & SONS, INC., a corporation organized and existing under the laws of the State of Delaware, hereby certifies as follows:

I. The original Certificate of Incorporation of the Corporation was filed with the Secretary of State of Delaware under the name of Delamere Company Inc. on June 23, 1933.

II. The text of the Certificate of Incorporation, as amended and supplemented heretofore, is hereby restated and further amended to read herein as set forth in full:

FIRST: The name of the Corporation is H. GOODMAN & SONS, INC.

SECOND: The address of its registered office in the State of Delaware is No. 100 West Tenth Street, in the City of Wilmington, County of New Castle. The name of its registered agent at such address is The Corporation Trust Company.

THIRD: The purpose of the Corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

FOURTH: The total number of shares of all classes of stock which the Corporation shall have authority to issue is 2,000,000 shares, consisting of 300,000 shares of Preferred Stock, par value $10 per share (the "Preferred Stock"), 200,000 shares of Class A Common Stock, par value $.10 per share (the "Class A Common Stock") and 1,500,000 shares of Class B Common Stock, par value $.10 per share (the "Class B Common Stock") (the Class A Common Stock and Class B Common Stock being herein collectively called the "Common Stock").

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The rights, preferences and limitations of said classes of stock follow:

I. Preferred Stock.

(A) The Preferred Stock may be issued from time to time by the Board of Directors as shares of one or more series of Preferred Stock, and, except as provided in clause (B) below, the Board of Directors is expressly authorized, prior to issuance, in the resolution or resolutions providing for the issue of shares of each particular series, to fix the following:

(i) The distinctive serial designation of, and the number of shares which shall constitute, such series, which number may be increased (except where otherwise provided by the Board of Directors in creating such series) or decreased (but not below the number of shares thereof then outstanding) from time to time by like action of the Board of Directors;

(ii) The annual dividend rate for such series, and whether the dividends on all shares of such series are to be cumulative;

(iii) The redemption provisions and the redemption price or prices, if any, for such series, which may consist of a redemption price or scale of redemption prices applicable only to redemption for a sinking fund (which term as used herein shall include any fund or requirement for the periodic purchase, redemption or retirement of shares), and a different redemption price or scale of redemption prices applicable to any other redemption;

(iv) The obligation, if any, of the Corporation to purchase or redeem shares of such series pursuant to a sinking fund;

(v) The terms, if any, upon which shares of such series shall be convertible into, or exchangeable for, shares of stock of any other

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class or classes, including the price or prices or the rate or rates of conversion or exchange and the terms of adjustment, if any;

(vi) The amount or amounts which the shares of such series are entitled to receive upon any voluntary or involuntary liquidation, dissolution or winding up of the Corporation, which, however, shall not exceed $100 per share, plus in respect of each such share a sum computed at the annual dividend rate for such series from and after the date on which dividends on such shares become cumulative to and including the date fixed for such payment, less the aggregate of dividends theretofore paid thereon; and

(vii) The voting rights, if any, and any other preferences, privileges and restrictions or qualifications of such series.

(B) There is hereby established a series of Preferred Stock consisting initially of 3,385 shares, which number of shares may be increased or decreased (but not below the number of shares thereof then outstanding) from time to time by the Board of Directors, and such series shall have the designations, preferences, privileges and voting powers, and the restrictions and qualifications which are herein set forth:

(i) The distinctive series designation of this series of Preferred Stock is Preferred Stock, 6% Series;

(ii) The holders of the Preferred Stock, 6% Series shall be entitled to receive, when and as declared by the Board of Directors of the Corporation either out of the net assets in excess of capital or out of the net profits as permitted by law, preferential dividends at the rate of six per centum (6%) per annum on the Liquidation Value thereof (as defined in Subparagraph B(iv) of this Article), and no more, payable annually, semi-annually or quarterly on such days as may be determined by the Board of Directors, before any dividend shall be declared or paid upon or set apart for the Common Stock. Such dividends upon the Preferred Stock, 6% Series shall be cumulative from the date of

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issue thereof, so that if dividends for any past dividend period at the rate of six per centum (6%) per annum shall not have been paid thereon, or declared and a sum sufficient for payment thereof set apart, the deficiency shall be fully paid or set apart, but without interest, before any dividend shall be paid upon or set apart for the Common Stock;

(iii) The Corporation may at the option of the Board of Directors, redeem the whole or any part of the outstanding Preferred Stock, 6% Series on any dividend payment date by paying One Hundred Dollars ($100) for each share thereof, together with a sum of money equivalent to dividends at the rate of six per centum (6%) per annum on the Liquidation Value thereof from the date or dates on which the dividends on said shares of Preferred Stock, 6% Series so to be redeemed became cumulative to the date fixed for such redemption, less the amount of dividends theretofore paid thereon. Notice of such election to redeem shall, not less than thirty (30) days prior to the date upon which the stock is to be redeemed, be mailed to each holder of stock so to be redeemed at his address as it appears on the books of the Corporation. In case less than all of the outstanding Preferred Stock, 6% Series is to be redeemed, the amount to be redeemed and the method of effecting such redemption, whether by lot or pro rata or otherwise, may be determined by the Board of Directors. If on or before the redemption date named in such notice, the funds necessary for such redemption shall have been set aside by the Corporation so as to be available for payment on demand to the holders of the Preferred Stock, 6% Series so called for redemption, then, notwithstanding that any certificate of the Preferred Stock, 6% Series so called for redemption shall not have been surrendered for cancellation, the dividends thereon shall cease to accrue from and after the date of redemption so designated, and all rights with respect to such Preferred Stock, 6% Series so called for redemption, including

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any right to vote or otherwise participate in the determination of any proposed corporate action, shall forthwith after such redemption date cease and determine, except only the right of the holder to receive the redemption price therefor, but without interest;

(iv) In the event of any liquidation, dissolution or winding up of the affairs of the Corporation, whether voluntary or involuntary, the holders of the Preferred Stock, 6% Series shall be entitled, before any assets of the Corporation shall be distributed among or paid over to the holders of the Common Stock, to be paid One Hundred Dollars ($100) per share, which is the Liquidation Value, together with a sum of money equivalent to dividends at the rate of six per centum (6%) per annum on the Liquidation Value thereof, from the date or dates upon which dividends on such Preferred Stock, 6% Series became cumulative to the date of payment thereof, less the amount of dividends theretofore paid thereon. If, upon such liquidation, dissolution or winding up, the assets of the Corporation distributable as aforesaid among the holders of the Preferred Stock, 6% Series shall be insufficient to permit of the payment to them of said amount, the entire assets shall be distributed ratably among the holders of the Preferred Stock, 6% Series; and

(v) Except as expressly required by law, the holders of the Preferred Stock, 6% Series shall have no voting power nor shall they be entitled to notice of meetings of stockholders.

II. Common Stock.

Except as otherwise provided in this Restated Certificate of Incorporation, all shares of Class A Common Stock and Class B Common Stock shall be alike in every particular.

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(A) The preferences, privileges and voting powers of the Class A Common Stock are herein set forth:

(i) Whenever the full dividend on the Preferred Stock, for all past dividend periods shall have been paid, and the full dividend thereon for the then current dividend period shall have been paid or declared and a sum sufficient for the payment thereof set apart, dividends upon the Class A Common Stock, may be declared by the Board of Directors out of the remainder of the net assets in excess of capital or out of the net profits, available for dividends, provided however that no dividend may be declared unless a dividend equal to the amount declared on each share of Class A Common Stock is also declared on each share of Class B Common Stock;

(ii) In the event of any liquidation, dissolution or winding up of the affairs of the Corporation, whether voluntary or involuntary, the assets of the Corporation remaining after distribution of the amounts required to be distributed to holders of the Preferred Stock shall be distributed ratably among each of the holders of the Class A and Class B Common Stock; and

(iii) All rights to vote and all voting powers are vested exclusively in the holders of the Class A Common Stock.

(B) The preferences, privileges, and voting powers of the Class B Common Stock are herein set forth:

(i) Whenever the full dividend on the Preferred Stock for all past dividend periods shall have been paid, and the full dividend thereon for the then current dividend period shall have been paid or declared and a sum sufficient for the payment thereof set apart, the holders of each share of Class B Common Stock shall be entitled to dividends in the amount declared by the Board of Directors on each share of Class A Common Stock;

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(ii) In the event of any liquidation, dissolution or winding up of the affairs of the Corporation, whether voluntary or involuntary, the assets of the Corporation remaining after the amounts required to be distributed to holders of the Preferred Stock shall be distributed ratably among each of the holders of the Class A and Class B Common Stock; and

(iii) All rights to vote and all voting powers are vested exclusively in the holders of the Class A Common Stock, and holders of the Class B Common Stock shall have no voting power nor shall they be entitled to notice of meetings of stockholders except as expressly required by law.

FIFTH: The Board of Directors of the Corporation is expressly authorized to make, alter or repeal the By-Laws of the Corporation, but the stockholders may make additional By-Laws and may alter or repeal any By-Law whether or not adopted by them.

SIXTH: Elections of Directors need not be by written ballot except and to the extent provided in the By-Laws of the Corporation.

III. The capital of the Corporation is $117,649.00, which is calculated by multiplying the par value of the shares of Class A Common Stock, Class B Common Stock, and Preferred Stock, 6% Series of the Corporation by the number of shares of each such class of stock issued and outstanding as of the date hereof.

IV. This Restated Certificate of Incorporation was duly approved and adopted by the holders of not less than a majority of the authorized and outstanding shares of capital stock of the Corporation entitled to vote thereon by the delivery of their written consent to said Restated Certificate of Incorporation in accordance with Sections 228,242 and 245 of the General Corporation Law of Delaware. Written notice of the approval and adoption has been given to all holders of capital stock entitled to vote thereon who did not so consent in writing in accordance with Section 228 of the General Corporation Law of Delaware.

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IN WITNESS WHEREOF, H. GOODMAN & SONS, INC. has caused this certificate to be signed by its President and attested by its Ass't. Secretary, this 2nd day of January, 1976.

H. GOODMAN & SONS, INC.

By _____
President

Attest:

_____
Ass't. Secretary

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CERTIFICATE OF AMENDMENT

OF

CERTIFICATE OF INCORPORATION

OF

H. GOODMAN & SONS, INC.

H. GOODMAN & SONS, INC., a corporation organized and existing under and by virtue of the General Corporation Law of the State of Delaware, DOES HEREBY CERTIFY:

FIRST: That at a meeting of the Board of Directors of H. GOODMAN & SONS, INC. held on May 22, 1980 the Board of Directors duly adopted resolutions setting forth proposed amendments to the Restated Certificate of Incorporation of said corporation, declaring said amendments to be advisable and submitting said amendments to the stockholders to be adopted at a Special Meeting of Stockholders. The resolutions setting forth the proposed amendments are as follows:

RESOLVED: That the Board of Directors proposes and declares advisable an amendment to the Restated Certificate of Incorporation of this corporation by changing the Article thereof numbered "FIRST" so that, as amended, said Article shall be and read in its entirety as follows:

"FIRST: The name of the Corporation is Goody Products, Inc.";

and further

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RESOLVED: That this Board proposes and declares advisable an amendment to the Restated Certificate of Incorporation of this corporation by changing the Article thereof numbered "FOURTH" so that, as amended, said Article shall be and read in its entirety as follows:

"FOURTH: The total number of shares of all classes of stock which the Corporation shall have authority to issue is 5,300,000 shares, consisting of 300,000 shares of Preferred Stock, par value $10 per share (the "Preferred Stock"), and 5,000,000 shares of Common Stock, par value $.10 per share (the "Common Stock"), and each share of Class A Common Stock and Class B Common Stock issued as of the date hereof is hereby converted into two shares of the new Common Stock, $.10 par value per share. The rights, preferences and limitations of said classes of stock follow:

I. Preferred Stock.

The Preferred Stock may be issued from time to time by the Board of Directors as shares of one or more series of Preferred Stock, and the Board of Directors is expressly authorized, prior to issuance, in the resolution or resolutions providing for the issue of shares of each particular series, to fix the following:

(i) The distinctive serial designation of, and the number of shares which shall constitute, such series, which number may be increased (except where otherwise provided by the Board of Directors in creating such series) or decreased (but not below the number of shares thereof then outstanding) from time to time by like action of the Board of Directors;

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(ii) The annual dividend rate for such series, and whether the dividends on all shares of such series are to be cumulative;

(iii) The redemption provisions and the redemption price or prices, if any, for such series, which may consist of a redemption price or scale of redemption prices applicable only to redemption for a sinking fund (which term as used herein shall include any fund or requirement for the periodic purchase, redemption or retirement of shares), and a different redemption price or scale of redemption prices applicable to any other redemption;

(iv) The obligation, if any, of the Corporation to purchase or redeem shares of such series pursuant to a sinking fund;

(v) The terms, if any, upon which shares of such series shall be convertible into, or exchangeable for, shares of stock of any other class or classes, including the price or prices or the rate or rates of conversion or exchange and the terms of adjustment, if any;

(vi) The amount or amounts which the shares of such series are entitled to receive upon any voluntary or involuntary liquidation, dissolution or winding up of the Corporation, which, however, shall not exceed $100 per share, plus in respect of each such share a sum computed at the annual dividend rate for such series from and after the date on which dividends on such shares become cumulative to and including the date fixed for such payment, less the aggregate of dividends theretofore paid thereon; and

(vii) The voting rights, if any, and any other preferences, privileges and restrictions or qualifications of such series.

II. Common Stock

The preferences, privileges and voting powers of the Common Stock are herein set forth:

(i) Whenever the full dividend on the Preferred Stock, for all past dividend periods shall have been paid, and the full dividend thereon for the then current dividend period shall have been paid or declared and a sum sufficient for the payment thereof set apart, dividends upon the Common Stock may be declared by the Board of Directors out of the remainder of the net assets in excess of capital or out of the net profits, available for dividends;

(ii) In the event of any liquidation, dissolution or winding up of the affairs of the Corporation, whether voluntary or involuntary, the assets of the Corporation remaining after distribution of the amounts required to be distributed to holders of the Preferred Stock shall be distributed ratably among each of the holders of the Common Stock; and

(iii) All rights to vote and voting powers are vested exclusively in the holders of the Common Stock."

SECOND: That the capital of the Corporation is $172,301.60, which is calculated by multiplying the par value

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of the shares of Common Stock of the Corporation by the number of shares of such class of stock issued and outstanding as of the date hereof.

THIRD: A. That on the 22nd day of May, 1980, at 11:00 A.M., in accordance with the By-Laws of the Corporation, and upon notice given in accordance with the laws of the State of Delaware and said By-Laws, a Special Meeting of the Stockholders of the Corporation was held, and there were present at such meeting, in person or by proxy, the holders of more than a majority of the shares of the Class A Common Stock of the Corporation outstanding and entitled to vote, constituting a quorum of said stockholders.

B. That at said Special Meeting of the Stockholders, said amendments, as aforesaid, were presented for consideration, and a vote of the holders of the Class A Common Stock was taken for and against said amendments.

C. That a majority of the outstanding Common Stock of the Corporation entitled to vote thereon voted in favor of said amendments; that there were 74,006 shares of Class A Common Stock issued and outstanding and entitled to vote on said amendments; that 73,838 shares of such Common Stock were represented at said meeting; that 73,838 shares of such Common Stock voted in favor of said amendments; that no shares of such Common Stock voted against said amendments; and that, therefore, a majority of the outstanding Common

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Stock entitled to vote thereon voted in favor of said amendments. Accordingly, said amendments were declared duly adopted.

FOURTH: That, accordingly, said amendments to the Restated Certificate of Incorporation of H. Goodman & Sons, Inc., as hereinbefore set forth, have been duly adopted in accordance with the provisions of Section 242 of the General Corporation Law of the State of Delaware.

IN WITNESS WHEREOF, said H. GOODMAN & SONS, INC. has caused this Certificate of Amendment to be signed by its President and attested by its Secretary on the 30th day of May, 1980.

H. GOODMAN & SONS, INC.

By _____
Leonard Goodman, President

Attest:

By _____
Marvin Katz, Secretary

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GOODY PRODUCTS, INC.

CERTIFICATE OF REDUCTION

OF CAPITAL

GOODY PRODUCTS, INC. (formerly H. GOODMAN & SONS, INC.), a corporation organized and existing under the General Corporation Law of the State of Delaware,

DOES HEREBY CERTIFY:

FIRST: That the Board of Directors of GOODY PRODUCTS, INC. (formerly H. GOODMAN & SONS, INC.), by the unanimous written consent of its members, filed with the minutes of the board, duly adopted resolutions setting forth a proposed reduction of the capital of said corporation in the manner and to the extent hereinafter set forth.

SECOND: That pursuant to the provisions of Section 244 of The General Corporation Law of the State of Delaware a reduction of the capital of the corporation by the amount of Thirty Two Thousand Eight Hundred and Thirty Four Dollars ($32,834) was authorized in the following manner:

> Through the conversion of Three Thousand Three Hundred and Eighty Five (3385) shares of its Preferred Stock Series 6%, par value Ten Dollars ($10.00), into Ten Thousand One Hundred and Fifty Five (10,155) shares of its Class B Common Stock, par value Ten Cents ($.10) by applying the par value of the above described Preferred Stock to surplus capital to the extent that such par value in the aggregate exceeded the total aggregate par value of the previously unissued above described Common Stock issuable upon such conversion: and the shares of capital stock of the corporation, which are retired in connection with the reduction of capital, are identified as being Three Thousand Three Hundred and Eighty Five (3385) shares of the Preferred Series 6% Stock with the par value of Ten Dollars ($10.00) per share.

THIRD: That the assets of the corporation remaining after such reduction are sufficient to pay any debts, the payment of which has not been otherwise provided for.

IN WITNESS WHEREOF, said GOODY PRODUCTS, INC. (formerly H. GOODMAN & SONS, INC.) has caused this certificate to be signed by Hiram M. Silverman, its Vice President and attested by Marvin Katz, its Secretary this 19th day of June, 1980.

GOODY PRODUCTS, INC.
(formerly H. GOODMAN & SONS, INC.)

By _____
Hiram M. Silverman, Vice President

ATTEST:

By _____
Marvin Katz, Secretary

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FILED

OCT 27 1987

CERTIFICATE OF AMENDMENT

OF

CERTIFICATE OF INCORPORATION

OF

GOODY PRODUCTS, INC.

Goody Products, Inc. (the "Corporation"), a Delaware corporation, hereby certifies that by amendment duly adopted by the Corporation's stockholders, in accordance with Section 242 of the Delaware General Corporation Law, to increase the authorized common stock of the Corporation from ten million to twenty million shares, the first paragraph of the Article numbered "Fourth" of the Corporation's Restated Certificate of Corporation was amended to read as follows:

"FOURTH: The total number of shares of all classes of stock which the Corporation shall have authority to issue is 20,300,000 shares consisting of 300,000 shares of Preferred Stock, par value $10 per share (the "Preferred Stock"), and 20,000,000 shares of Common Stock, par value $.10 per share (the "Common Stock"). The rights, preferences and limitations of said classes of stock follow:"

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The Corporation further certifies that a new Article numbered "Seventh" to be added to the Corporation's Restated Certificate of Incorporation, with respect to the liability of its directors, by amendment was duly adopted by the Corporation's stockholders in accordance with Section 242 of the Delaware General Corporation Law, to read as follows:

"SEVENTH: A director of the corporation shall not be liable to the corporation or its stockholders for monetary damages for breach of fiduciary duty as a director, except to the extent such exemption from liability or limitation thereof is not permitted under the Delaware General Corporation Law as currently in effect or as the same may hereafter be amended.

"No amendment, modification or repeal of this Article SEVENTH shall adversely affect any right or protection of a director that exists at the time of such amendment, modification or repeal."

IN WITNESS WHEREOF, Goody Products, Inc. has caused this certificate to be signed by Marvin Katz, Senior Vice President of the Corporation, and attested by David M. Sandgrund, its Assistant Secretary, on the 9th day of October, 1987.

GOODY PRODUCTS, INC.

By: _____
Marvin Katz
Senior Vice President

Attest:

By: _____
David M. Sandgrund
Assistant Secretary

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STATE OF DELAWARE
SECRETARY OF STATE
DIVISION OF CORPORATIONS
FILED 10:00 AM 12/30/1993
733364061 - 325209

CERTIFICATE OF OWNERSHIP AND MERGER

merging

ACE COMB CO., INC.
(an Arkansas corporation)

into

GOODY PRODUCTS, INC.
(a Delaware corporation)

(pursuant to Section 253 of the General Corporation Law of the State of Delaware)

Pursuant to the provisions of Section 253 of the General Corporation Law of the State of Delaware, Goody Products, Inc., a Delaware corporation (the "Corporation"), does hereby certify:

1. That the Corporation is incorporated pursuant to the General Corporation Law of the State of Delaware.

2. That the Corporation is the owner of all the outstanding shares of common stock of Ace Comb Co., Inc., an Arkansas corporation.

3. That the laws of the jurisdiction of organization of Ace Comb Co., Inc. permit the merger of a business corporation of that jurisdiction with a business corporation of another jurisdiction.

4. That the Corporation hereby merges Ace Comb Co., Inc. into the Corporation, and that the name of the corporation surviving the merger is Goody Products, Inc.

5. That the following is a copy of the resolutions adopted on December 23, 1993, by the Board of Directors of the Corporation to merge the said Ace Comb Co., Inc. into the Corporation:

> WHEREAS, the Board of Directors of the Corporation deems it in the best interests of the stockholder of the Corporation that Ace Comb Co., Inc., an Arkansas corporation, be merged with and into the Corporation),

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NOW, THEREFORE, BE IT RESOLVED, that the Corporation hereby adopts the following Plan of Merger:

A. Goody Products, Inc., which is a business corporation of the State of Delaware and is the parent corporation and the owner of all of the outstanding shares of Ace Comb Co., Inc., which is a business corporation of the State of Arkansas and the subsidiary corporation, hereby merges Ace Comb Co., Inc. into Goody Products, Inc. pursuant to the respective provisions of the Arkansas Business Corporation Act and the Delaware General Corporation Law.

B. The separate existence of Ace Comb Co., Inc. shall cease upon the effective date of the merger, which shall occur upon the filing of articles of merger pursuant to the provisions of the Arkansas Business Corporation Act; and Goody Products, Inc. shall continue its existence as the surviving corporation pursuant to the provisions of the laws of the State of Delaware.

C. The issued shares of Ace Comb Co., Inc. shall not be converted in any manner, but each share which is issued as of the effective date of the merger shall be surrendered and extinguished.

D. Goody Products, Inc. shall assume all of the obligations of Ace Comb Co., Inc.

E. Goody Products, Inc. shall cause to be executed and filed and/or recorded the documents prescribed by the laws of the State of Delaware, by the laws of the State of Arkansas and by the laws of any other appropriate jurisdiction and to be performed all necessary acts within any such jurisdictions.

IN WITNESS WHEREOF, Goody Products, Inc. has caused this Certificate of Ownership and Merger to be executed in its corporate name this 27th day of December, 1993.

GOODY PRODUCTS, INC.

By: Ronald B. Gordon

Ronald B. Gordon, President

Attest:

Diana Wheeler

Diana Wheeler, Assistant Secretary

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CERTIFICATE OF AMENDMENT

OF

CERTIFICATE OF INCORPORATION

OF

GOODY PRODUCTS, INC.

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FILED

JUN 3 1983

SECRETARY OF STATE

GOODY PRODUCTS, INC. (the "Corporation"), a corporation organized and existing under and by virtue of the General Corporation Law of the State of Delaware, DOES HEREBY CERTIFY:

FIRST: That by unanimous written consent dated February 11, 1982 the Corporation's Board of Directors duly adopted a resolution setting forth a proposed amendment to the Restated Certificate of Incorporation of the Corporation, declaring said amendment to be advisable and submitting said amendment to the stockholders to be adopted at the 1982 Annual Meeting of Stockholders. The resolution setting forth the proposed amendment is as follows:

RESOLVED, that the Board of Directors proposes and declares advisable an amendment to the Restated Certificate of Incorporation of the Corporation changing the Article thereof numbered "FIFTH" so that, as amended, said Article shall be and read in its entirety as follows:

> FIFTH: The Board of Directors of the Corporation is expressly authorized to make, alter or repeal the By-Laws of the Corporation, but the stockholders may make additional By-Laws and may alter or repeal any By-Law whether or not adopted by them; provided, however, that the provisions of the last sentence of Section 6.7 of the By-Laws may be altered or repealed, or a new By-Law inconsistent with such provisions may be made, only if such alteration, repeal or making is approved by the affirmative vote of two-thirds of the outstanding shares of all classes entitled to vote thereon.

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SECOND: A. That on the 5th day of May, 1982, at 10:00 A.M., in accordance with the By-Laws of the Corporation, and upon notice given in accordance with the laws of the State of Delaware and said By-Laws, the 1982 Annual Meeting of the Stockholders of the Corporation was held, and there were present at such meeting, in person or by proxy, the holders of more than two-thirds of the shares of the Common Stock of the Corporation outstanding and entitled to vote, constituting a quorum of said stockholders.

B. That at said Annual Meeting of the Stockholders, said amendment, as aforesaid, was presented for consideration, and a vote of the holders of the Common Stock of the Corporation was taken for and against said amendment.

C. That more than two-thirds of the outstanding Common Stock of the Corporation entitled to vote thereon voted in favor of said amendment; that there were 2,055,016 shares of Common Stock issued and outstanding and entitled to vote on said amendment; that 1,711,685 shares of such Common Stock were represented at said meeting; that 1,693,835 shares of such Common Stock voted in favor of said amendment; that 7,570 shares of such Common Stock voted against said amendment; and that, therefore, more than two-thirds of the outstanding Common Stock entitled to vote thereon voted in favor of said amendment. Accordingly, said amendment was declared duly adopted.

THIRD: That, accordingly, said amendment to the Restated Certificate of Incorporation of the Corporation, as hereinbefore set forth, has been duly adopted in accordance with the provisions of Section 242 of the General Corporation Law of the State of Delaware.

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IN WITNESS WHEREOF, said GOODY PRODUCTS, INC. has caused this Certificate of Amendment to be signed by its President and attested by its Secretary on the 20th day of May, 1983.

GOODY PRODUCTS, INC.

By _____
Leonard Goodman, President

Attest:

By _____
Marvin Katz, Secretary

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CERTIFICATE OF AMENDMENT

OF

CERTIFICATE OF INCORPORATION

OF

GOODY PRODUCTS, INC.

(Pursuant to Section 242)

FILED
JUL 16 1984 9AM
SECRETARY OF STATE

Goody Products, Inc., a Delaware corporation, hereby certifies as follows:

That the following amendment of the first paragraph of the Article numbered "Fourth" of the corporation's Restated Certificate of Incorporation, increasing the authorized common stock of the corporation from 5 million to 10 million shares, was duly adopted by the corporation's shareholders.

"FOURTH: The total number of shares of all classes of stock which the Corporation shall have authority to issue is 10,300,000 shares consisting of 300,000 shares of Preferred Stock, par value $10 per share (the "Preferred Stock"), and 10,000,000 shares of common stock, par value $.10 per share (the "Common Stock"). The rights, preferences and limitations of said classes of stock follow:"

IN WITNESS WHEREOF, Goody Products, Inc. has caused this certificate to be signed by Hiram M. Silverman, a Vice-President, and attested by David M. Sandgrund, its Assistant Secretary, on the 9th day of July, 1984.

GOODY PRODUCTS, INC.

By: _____
Hiram M. Silverman
Vice-President

Attest:

By: _____
David M. Sandgrund
Assistant Secretary

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STATE OF DELAWARE
SECRETARY OF STATE
DIVISION OF CORPORATIONS
FILED 09:45 AM 11/09/1993
933135107 - 325209

CERTIFICATE OF MERGER

of

GPI ACQUISITION CO.

into

GOODY PRODUCTS, INC.

Pursuant to Section 251 of the General Corporation Law of the State of Delaware

Pursuant to Section 251(c) of the General Corporation Law of the State of Delaware, Goody Products, Inc., a Delaware corporation, hereby certifies the following information relating to the merger of GPI Acquisition Co., a Delaware corporation, with and into Goody Products, Inc. (the "Merger").

1. The names and states of incorporation of Goody Products, Inc. and GPI Acquisition Co., which are the constituent corporations in the Merger (the "Constituent Corporations"), are:

Names	State
Goody Products, Inc.	Delaware
GPI Acquisition Co.	Delaware

2. The Agreement and Plan of Merger, dated as of August 2, 1993, by and among Newell Co., a Delaware corporation and the sole stockholder of GPI Acquisition Co., Goody Products, Inc. and GPI Acquisition Co. (the "Merger Agreement"), setting forth the terms and conditions of the Merger, has been approved, adopted, certified, executed and acknowledged by each of the Constituent Corporations in accordance with the provisions of Section 251(c) of the General Corporation Law of the State of Delaware.

3. Pursuant to the Merger Agreement, GPI Acquisition Co. shall be merged with and into Goody Products, Inc. and Goody Products, Inc. shall be the corporation surviving the Merger.

4. The Restated Certificate of Incorporation of Goody Products, Inc. shall be the Certificate of Incorporation of the surviving corporation, and, as amended by the Merger, shall be as set forth in Exhibit A attached hereto.

5. The executed Merger Agreement is on file at the principal place of business of the surviving corporation, which is located at 969 Newark Turnpike, Kearny, New Jersey 07032.

6. A copy of the Merger Agreement will be furnished by the surviving corporation, on request and without cost, to any stockholder of either of the Constituent Corporations.

IN WITNESS WHEREOF, this Certificate of Merger has been executed on this 9th day of November, 1993.

GOODY PRODUCTS, INC.

By: _____

Name: Kevin E. Walsh

Title: Executive Vice-President - Chief Financial Officer

Attest:

_____

Name: David M. Sandgrund

Title: Secretary

C:\TEXT\RJM\10808\MERGER.CER

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EXHIBIT A

RESTATED

CERTIFICATE OF INCORPORATION OF

GOODY PRODUCTS, INC.

FIRST. The name of the corporation is Goody Products, Inc.

SECOND. The address of the corporation's registered office in the State of Delaware is 32 Loockerman Square, L-100, in the City of Dover, County of Kent. The name of its registered agent at such address is The Prentice-Hall Corporation System, Inc.

THIRD. The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

FOURTH. The total number of shares of stock which the corporation shall have authority to issue is One Thousand (1,000) shares of Common Stock of the par value of $.10 per share.

Any and all right, title, interest and claim in or to any dividends declared by the corporation, whether in cash, stock or otherwise, which are unclaimed by the stockholder entitled thereto for a period of six years after the close of business on the payment date shall be and be deemed to be extinguished and abandoned, and any such unclaimed dividends in the possession of the corporation, its transfer agents or other agents or depositaries shall at such time become the absolute property of the corporation, free and clear of any and all claims of any persons whatsoever.

FIFTH. In furtherance and not in limitation of the powers conferred by statute, the board of directors of the corporation is expressly authorized:

(1) To adopt, amend or repeal the by-laws of the corporation and

(2) To provide for the indemnification of directors, officers, management, employees and agents of the corporation, and of persons who serve other enterprises in such or similar capacities at the request of the corporation, to the full extent permitted by the General Corporation Law of Delaware or any other applicable laws, as may from time to time be in effect.

SIXTH. A director of the corporation shall not be personally liable to the corporation or its stockholders for monetary damages for breach of fiduciary duty as a director, except for liability (i) for any breach of the director's duty of loyalty to the corporation or its stockholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (iii) under Section 174 of the Delaware General Corporation Law, or (iv) for any transaction from which the director derived an improper personal benefit. Any repeal or modification of the foregoing paragraph by the stockholders of the corporation shall not adversely affect any right or protection of a director of the corporation existing at the time of such repeal or modification.

SEVENTH. Elections of directors need not be by written ballot unless the by-laws of the corporation shall so provide.

EIGHTH. Action may be taken by the stockholders of the corporation, without a meeting, by written consent as and to the extent provided at the time by the General Corporation Law of Delaware, provided that the matter to be acted upon by such written consent previously has been approved by the board of directors of the corporation and directed by such board to be submitted to the stockholders for their action thereon by written consent.

NINTH. Whenever a compromise or arrangement is proposed between this corporation and its creditors or any class of them and/or between this corporation and its stockholders or any class of them, any court of equitable jurisdiction within the State of Delaware may, on the application in a summary way of this corporation or of any creditor or stockholder thereof or on the application of any receiver or receivers appointed for this corporation under the provisions of section 291 of Title 8 of the Delaware Code or on the application of trustees in dissolution or of any receiver or receivers appointed for this corporation under the provisions of section 279 of Title 8 of the Delaware Code order a meeting of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this corporation, as the case may be, to be summoned in such manner as the said court directs. If a majority in number representing three-fourths in value of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this corporation, as the case may be, agree to any compromise or arrangement and to any reorganization of this corporation as consequence of such compromise or arrangement, the said compromise or arrangement and the said reorganization shall, if sanctioned by the court to which the said application has been made, be binding on all the creditors or class of creditors, and/or on all the stockholders or class of stockholders, of this corporation, as the case may be, and also on this corporation.

TENTH. The corporation reserves the right to amend its certificate of incorporation, and thereby to change or repeal any provision therein contained, from time to time, in the manner prescribed at the time by statute, and all rights conferred upon stockholders by such certificate of incorporation are granted subject to this reservation.

DM: A:\GPI\EXH.A\CERT-INC

STATE OF DELAWARE
SECRETARY OF STATE
DIVISION OF CORPORATIONS
FILED 02:00 PM 11/03/1994
944211446 - 325209

CERTIFICATE OF CHANGE OF REGISTERED AGENT

AND

REGISTERED OFFICE

* * * * *

Goody Products, Inc., a corporation organized and existing under and by virtue of the General Corporation Law of the State of Delaware, DOES HEREBY CERTIFY:

The present registered agent of the corporation is The Prentice-Hall Corporation System, Inc. and the present registered office of the corporation is in the county of Kent

The Board of Directors of

adopted the following resolution on the 2nd day of November, 19 94.

Resolved, that the registered office of **Goody Products, Inc.**

in the state of Delaware be and it hereby is changed to Corporation Trust Center, 1209 Orange Street, in the City of Wilmington, County of New Castle, and the authorization of the present registered agent of this corporation be and the same is hereby withdrawn, and THE CORPORATION TRUST COMPANY, shall be and is hereby constituted and appointed the registered agent of this corporation at the address of its registered office.

IN WITNESS WHEREOF, **Goody Products, Inc.** has caused this statement to be signed by Richard H. Wolff, its Secretary*, this 25th day of OCT, 19 94.

Secretary
(Title)

*Any authorized officer or the chairman or Vice-Chairman of the Board of Directors may execute this certificate.

(DEL. - 264 - 6/15/94)

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