ECRA-001
12/87

FOR DEP USE ONLY
Date Rec'd _____
Notice No _____

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
INDUSTRIAL SITE EVALUATION ELEMENT
CN 028, TRENTON, N.J. 08625

ENVIRONMENTAL CLEANUP RESPONSIBILITY ACT (ECRA)

INITIAL NOTICE

ORIGINAL

GENERAL INFORMATION SUBMISSION (GIS)

This is the first part of a two-part application form. This information must be submitted within 5 days following any applicable situation as specified at N.J. A. C. 7:26B-1.5 or any triggering event as specified at N.J. A. C. 7:26B-1.6. Please refer to the instructions and N.J.A.C. 7:26B-3.2 before filling out this form. Answer all questions. Should you encounter any problems in completing this form, we recommend that you discuss the matter with a representative from the Element. Submitting insufficient data may cause processing delays and possible postponement of your transaction. Please call (609) 633-7141 between the hours of 8:30 a.m. and 4:30 p.m. to request assistance.

PLEASE TYPE OR PRINT

Date 9 February 1988

1. A. Industrial Establishment

Name HABA International, Inc. Telephone # (201) 485-4490

Street Address 29-75 Riverside Avenue

City of Town Newark, State NJ Zip Code 07104

Municipality City of Newark County Essex

B. Tax Block Number(s) 0614 Tax Lot Number(s) 057

C. Standard Industrial Classification (SIC) Number 2844

D. Current Owner(s) (Property)

Name Mr. James Placa Telephone # (201) 485-4490

Firm Placa Realty

Street Address 6 Harwich Road

Municipality Morristown, State NJ Zip Code 07960

E. Current Business Operator(s) of Industrial Establishment

Name Mr. James Placa Telephone # (201) 485-4490

Firm HABA International, Inc.

Street Address 29-75 Riverside Avenue

Municipality Newark State NJ Zip Code 07104

531130

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12/87

F. Current Owner(s) (Business, if different from operator(s))

Name Mr. James Placa Telephone # (201) 485-4490

Firm HABA International, Inc.

Street Address 29-75 Riverside Avenue

Municipality Newark State NJ Zip Code 07104

G. Have there been any previous ECRA submissions by this Industrial Establishment or another Industrial Establishment which occupied the same tax block and lot number?

____ Yes X No

If Yes, Name of Industrial Establishment _____

ECRA Case No. _____ Date Submitted _____

Current Status _____

2. Describe the transaction in terms of the action which initiates the ECRA review. (See N.J.A.C. 7:26B-1.5&1.6)

The transaction which initiates the ECRA review is a sale of business only.

3. Is a cessation of operations involved at this location? ____ Yes X No

If Yes, give the date of public release of the decision to close the facility. Date ____/____/____

Is a copy of the public release enclosed? ____ Yes X No

If No, state the reason A cessation of operations will not occur at this location.

4. If the transaction initiating an ECRA review is an agreement of sale or execution of an option to purchase, fill in the date of execution of that instrument plus provide one (1) copy of the document. Date _____

A. Is a sale involved? X Yes ____ No (If no, skip 4B, C and D.)

B. Date of Agreement/Letter of Intent/Notifications of Option to Purchase 12 / 11 / 87

C. Is a copy of the agreement of sale or option to purchase enclosed? X Yes ____ No (See Attachment 1)

If No, state the reason _____

D. List other parties (purchasers) to the transaction:

NAME	STREET ADDRESS & MUNICIPALITY	PHONE NO.
Davion, Inc.	29-75 Riverside Avenue Newark, New Jersey	201/485-4490

5. Date proposed for closure of operations or transfer of title 30 April 1988

6. Authorized agent designated to work with the Department

Name Thomas Myers Telephone # (201) 563-1100

Firm TRC Environmental Consultants, Inc.

Street Address 26 H Worlds Fair Drive

Municipality Somerset State NJ Zip Code 08873

ECRA-001
12/87

CERTIFICATIONS:

A. The following certification shall be signed by the highest ranking individual at the site with overall responsibility for that site or activity. Where there is no individual at the site with overall responsibility for that site or activity, this certification shall be signed by the individual having responsibility for the overall operation of the site or activity.

I certify under penalty of law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-8.

Typed/Printed Name: James A. Placa Title: President

Signature: [signature] Date: 2/26/88

Sworn to and Subscribed Before Me
on this
Date of Feb 26 1988

Mark J. Cagnina
Notary Expiration date 1990
I.D# 147139
Essex County

B. The following certification shall be signed as follows:

1. For a corporation, by a principal executive officer of at least the level of vice president;
2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
3. For a municipality, State, Federal or other public agency, by either a principal executive officer or ranking elected official.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, 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. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate, or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-8.

Typed/Printed Name: James A. Placa Title: President

Signature: [signature] Date: 2/26/88

Sworn to and Subscribed Before Me
on this
Date of Feb 26 1988

Mark J. Cagnina
Notary Expiration date 1990
Essex County
I.D# 147139

UNIFORM COMMERCIAL ... IND. OR CORP. 269 S ALL-STATE LEGAL SUPPLY CO. D STREET, MOUNTAINSIDE, N.J. 07092

Bill of Sale

Know all Men by these Presents:

That HABA INTERNATIONAL, INC.

residing or located at 29-75 Riverside Avenue, Bldg. #10 *in the County of* Essex *in the* City *of* Newark *and State of* New Jersey *herein referred to as the Seller,*

for and in consideration of the sum of approx. $925,000 *paid to him, at or before the ensealing and delivery of these presents, by* DAVION, INC.

about to be *located at* 29-75 Riverside Avenue, Bldg. #10 *in the County of* Essex *in the* City *of* Newark *and State of* New Jersey *herein referred to as the Buyer,*

sells, transfers, sets over and assigns unto Buyer the following described business; manufacturing and sale of health and beauty aid products, including nail polish remover and related items

now located at 29-75 Riverside Ave., Bldg. #10, Newark, NJ 07104

including the stock in trade, fixtures, equipment, good-will, trade name, licenses, lease and all rights under any contracts for vending machines, public telephones or any other rental or use of equipment at the said premises, more particularly described and mentioned in the Schedule herein.

COPY

TO HAVE AND TO HOLD, the same unto Buyer forever, subject to the following: Security Interest granted unto and held by The National State Bank, Elizabeth, N.J., as well as all tax obligations owed by Seller and an amount equal to 30% of Seller's unsecured debt, but free and clear of all other claims, debts, liens and encumbrances.

~~Seller hereby covenants and agrees that he will not re-establish, re-open, become engaged, employed or in any other manner whatsoever interested, directly or indirectly in the same or similar business within a radius of~~

~~for a period of~~ ~~years from the date hereof.~~

The warranties, covenants and promises contained in the agreement heretofore entered into between Seller and Buyer for the sale and purchase hereby consummated, shall not merge in but shall survive this Bill of Sale and become a part hereof and shall continue in full force and effect as though set forth herein at length.

Seller hereby assigns and transfers to Buyer as part of this sale, the existing lease for the premises used in connection with said business, dated 19 , together with all the Seller's right, title, interest and claim in and to the sum of $ -- deposited with the landlord as security under the terms of the said lease.

Seller covenants and agrees, to and with Buyer, to warrant and defend the sale of said business, goods and chattels hereby sold, unto Buyer against all and every person or persons, except as otherwise herein stated.

All the terms, covenants and conditions herein contained shall be for and shall inure to the benefit of and shall bind the respective parties hereto, and their legal representatives, successors and assigns, respectively.

In all references herein to any parties, persons, entities or corporations the use of any particular gender or the plural or singular number is intended to include the appropriate gender or number as the text of the within instrument may require.

In Witness Whereof, *the seller has hereunto set his hand and seal, or caused these presents to be signed by its proper corporate officers and caused its proper corporate seal to be hereto affixed, the day of* December *19* 87.

HABA INTERNATIONAL, INC.

By: [signature]

James A. Placa, President

Signed, Sealed and Delivered in the presence of or Attested by

SCHEDULE

The following is the schedule of the property transferred.

Any and all assets of the Seller of any kind, nature or description, both tangiblo and intangible, wherever located, including but not limited to all accounts receivable, contract rights, inventory, equipment, machinery, fixtures, leases, leasehold improvements, bank accounts, motor vehicles, molds, tools, dies, patents, copy rights, trade names and trade marks.

State of New Jersey, } ss.:
County of Essex

JAMES A. PLACA being duly sworn, says:

1. He is not a minor.
2. He is the President of Haba International, Inc., which corporation is in actual possession of the business and property mentioned in this Bill of Sale.
3. He has the absolute right and authority to sell same under the conditions and terms mentioned in the Bill of Sale.
4. There are no liens, mortgages, security interests, judgments, levies, Municipal, State, Federal, Unemployment Compensation or Social Security taxes unpaid, nor any persons or corporations who have any claim of any nature whatsoever against the said business and goods and chattels and that the same are free and clear, except, security interest held by The National State Bank, Elizabeth, N.J. and outstanding taxes due and owing to the Internal Revenue Service and State of New Jersey.
5. The following is a true and complete list of Seller's existing Creditors; their names and business addresses, the amounts owed to each and the names and addresses of all persons known to Seller to assert claims against Seller whether disputed or not.

Name	Address	Amount
see attached list		

6. This affidavit is made to induce Buyer to purchase said business and goods and chattels knowing that Buyer relies upon the truth of the statements herein contained.

Sworn and subscribed to before me,
this 11th day of December 19 87

JAMES A. PLACA

Joy Giamatti

JOY A. GIAMATTI
A Notary Public of New Jersey
My Commission Expires Dec. 11, 1989

State of New J , County of ss.: Be it Remembered,
that on 19 , before me, the s. iber,

personally appeared

who, I am satisfied, the person named in and who executed the within Instrument,
and thereupon acknowledged that signed, sealed and delivered the same as
act and deed, for the uses and purposes therein expressed.

State of New Jersey, County of Essex | ss.: Be it Remembered,
that on December 19 87 , before me, the subscriber, a Notary Public
of the State of New Jersey,
personally appeared James A. Placa
who, being by me duly sworn on his oath, deposes and makes proof to my satisfaction, that
he is the Secretary of Haba International, Inc.
the Corporation named in the within Instrument;
that James A. Placa is the
President of said Corporation; that the execution, as well as the making of this Instrument, has been duly authorized by a proper resolution of the Board of Directors of the said Corporation; that deponent well knows the corporate seal of said Corporation; and that the seal affixed to said Instrument is the proper corporate seal and was thereto affixed and said Instrument signed and delivered by said President as and for the voluntary act and deed of said Corporation, in presence of deponent, who thereupon subscribed h is name thereto as attesting witness.

Sworn to and subscribed before me,
the date aforesaid.

Joy A. Giamatti

JOY A. GIAMATTI
A Notary Public of New Jersey
My Commission Expires Dec. 11, 1989.

Prepared by
Robert B. Wasserman, an Attorney
at Law of the State of New Jersey

Bill of Sale
Goods and Chattels

TO

Dated, , 19

AFFIDAVIT OF HABA INTERNATIONAL, INC.

Re: Small Business Designation

I, James A. Placa, of full age, being duly sworn according to law, upon my oath depose and say:

1. I am the President of HABA International, Inc. having an address of 29-75 Riverside Avenue, Newark, New Jersey.

2. HABA International, Inc. is an independently owned and operated company, and is not dominant in its field.

3. HABA International, Inc. has 18 full time employees.

Based upon the above information, HABA International, Inc. should be designated a small business for ECRA purposes.

James A. Placa

Subscribed and sworn to before me this 26 day of February, 1988.

Marie J Cagnina

I.D # 147139
Expiration date 1990
Essex County

ECRA-002
12/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
INDUSTRIAL SITE EVALUATION ELEMENT
CN 028, TRENTON, N.J. 08625

ORIGINAL

ENVIRONMENTAL CLEANUP RESPONSIBILITY ACT (ECRA)

INITIAL NOTICE

SITE EVALUATION SUBMISSION (SES)

This is the second part of a two-part application form. This information must be submitted within 45 days following any applicable situation as specified at N.J.A.C. 7:26B-1.5 or any triggering event as specified at N.J.A.C. 7:26B-1.6. Please refer to the instructions and N.J.A.C. 7:26B-3.2 before filling out this form. Answer all questions. Should you encounter any problems in completing this form, we recommend that you discuss the matter with a representative from the Element. Submitting incorrect or insufficient data may cause processing delays and possible postponement of your transaction. Please call (609) 633-7141 between the hours of 8:30 a.m. and 4:30 p.m. to request assistance.

PLEASE PRINT OR TYPE

Date 9 February 1988

1. Industrial Establishment

Name HABA International, Inc.

Address 29-75 Riverside Avenue

City or Town Newark, Zip Code 07104

Municipality City of Newark County Essex

A. Operational and Ownership History: *(Attach additional sheets if necessary)*

Name	Owner/ Operator	From	To	Current Address
Pittsburgh Paint and Glass	Owner/Oper.	1964	1981	Pittsburgh, PA
HABA International, Inc.	Operator	1982	Present	29-75 Riverside Ave. Newark, NJ
Acupak, Inc. (Tenant)	Operator	Nov. 1987	Present	29-75 Riverside Ave. Newark, NJ

B. Brief description of past operation(s) conducted on site *(Attach additional sheets if necessary)*

Prior to 1964, the site was a residential area. Pittsburgh Paint and Glass Company (PPG) built the subject property in 1964. PPG utilized the site as a manufacturing facility for paint and assorted related products. HABA International operated at the site from 1982 to the present time. HABA has utilized the site to formulate and package nail polish and nail polish remover.

ECRA-002
12/87

2. List all federal and state environmental permits applied for, or received, or both, at this facility *(Attach additional sheets if necessary)*

Check here if no permits are involved _____

A. New Jersey Bureau of Air Pollution Control

Permit Number	Certificate Number	Date of Approval or Denial	Reason for Denial (If applicable)	Expiration Date
None				

B. New Jersey Pollutant Discharge Elimination System (NJPDES)

Number	Discharge Activity	Date Issued or Denied	Expiration Date	Body of Water Discharged Into
None				

C. United State Environmental Protection Agency (EPA) Identification Number and copy of the most recent generator Annual Report prepared pursuant to the New Jersey Hazardous Waste Regulations. *(If applicable)*

ID # NJD980536379

Is a copy of the Annual Report attached? X Yes (See Attachment # 1) ____ No

D. Resource, Conservation, Recovery Act (RCRA) Permit # None

E. Bureau of Underground Storage Tank Registration Number(s) None

F. All other federal, state, local governmental permits.

Agency Issuing Permit	Permit No.	Date of Approval or Denial	Expiration Date
None			

3. Summary of Enforcement Actions for Violation of Environmental Laws or Regulations:

Check here if no enforcement actions are involved X

A. Date of Action _____

Section of Law or Statute violated _____

Type of Enforcement Action _____

Description of the Violation _____

How was the violation resolved? _____

B. Date of Action _____

Section of Law or Statute violated _____

Type of Enforcement Action _____

Description of the Violation _____

How was the violation resolved? _____

4. Site Map

Is this map enclosed? X Yes (See Attachment # 2) ____ No

If No, state the reason _____

(Attach additional pages, if necessary)

5. Decription of Operations:

Is this report enclosed? X Yes (See Attachment #_____) ____ No

If No, state the reason _____

6. Description of Building Heating System:

A. How is the Industrial Establishment currently heated? (Oil, Gas, Electric) Gas

How long has the Industrial Establishment been heated by the above fuel/energy source: 24 years

B. Was the Industrial Establishment heated by fuel oil at any time: ____ Yes X No

Is information on the decommissioning of underground fuel oil tanks included with item No. 14 of this form?

____ Yes X No If no, explain below: There are no underground fuel oil tanks on the property.

C. Are the results of the Integrity Evaluation for Existing Underground Fuel Oil Tanks enclosed?

____ Yes (See Attachment #_____) X No If no, state the reason Not applicable.

7. Summary of Industrial Establishment Wastewater Discharges of Sanitary and/or Industrial Waste:

A.

Discharge Period From	To	Discharge Type	Treatment By
1940	Present	Sanitary	Public Treatment Works

B. If the Industrial Establishment discharges sanitary and/or industrial wastes to a publicly-owned treatment plant, provide the name/address of that facility.

Name Passaic Valley Sewage Authority Telephone # 201-344-1800

Street Address 600 Wilson Avenue

Municipality Newark State NJ Zip Code 07105

	Date(s) of Discharge	Nature of Discharge
1.	1940 to Present	Sanitary
2.		
3.		

8. Hazardous Substance and Waste Containment Description: *(Attach additional sheets if necessary)*

Type of Storage Unit	Date Installed	Area or Volumetric Capacity (include units)	Material Stored	Construction Type	Location Reference	Decommissioning or Sampling Reference
Aboveground Tank	1982	4500 Gal.	Acetone	Steel	Attach. 1	Appendix 4
Aboveground Tank	1982	4500 Gal.	Ethyl acetate	Steel	Attach. 1	Appendix 4
Drum	--	55 Gal.	Butyl stearate (Fatty Ester)	Steel	Attach. 1	N/A
Drum	--	55 Gal.	Polyquart H	Steel	Attach. 1	N/A
Drum	--	55 Gal.	Tenox	Steel	Attach. 1	N/A
Drum	--	55 Gal.	Lubricating Oil	Steel	Attach. 1	N/A
Drum	--	55 Gal.	Compressor Condensate	Steel	Attach. 1	N/A
Drum	--	200-300 Gal.	Off-Spec (Waste) Nail Polish Remover	Steel	Attach. 1	

9. Hazardous Substance/Waste Inventory:

Material Name	Quantity (indicate units)	Location Reference	Storage Method Container Type/Size	Typical Annual Usage	To Remain on Site (Yes or No)
Acetone	4000 Gal.	Attachment 1	4500 Gal Aboveground Tank	13,000 Gal.	Yes
Ethyl Acetate	4000 Gal.	Attachment 1	4500 Gal Aboveground Tank	13,000 Gal.	Yes
Butyl Stearate	400 Lbs.	Attachment 1	55 Gal. Steel Drums	1,200 Lbs.	Yes
Polyquart H	500 Lbs.	Attachment 1	55 Gal. Steel Drums	1,500 Lbs.	Yes
Tenox	45 Lbs.	Attachment 1	55 Gal. Steel Drums	135 Lbs.	Yes
Lubricating Oil	55 Gal.	Attachment 1	55 Gal. Steel Drums	80 Gal.	Yes
Compression Condensate (Waste)	5 Gal.	Attachment 1	5 Gal. Pail	5-10 Gal.	No
Off-Spec (Waste Nail Polish Remover	55 Gal.	Attachment 1	55 Gal. Steel Drums	1,000 Gal.	No

10. Discharge History of Hazardous Substances and Wastes:

A. Have there been any discharges of hazardous substances and wastes?
X Yes (Complete Item B below) ____ No (Go to Item 10C)

B. Summary of Discharges and Resolutions

Description of Discharge Event	Response and Resolutions
Acetone Spill (See Attachment 4)	

C. Is this Industrial Establishment subject to Spill Prevention Control and Countermeasure (SPCC) per 40 CFR Part 112 or Discharge Prevention, Containment and Countermeasure (DPCC) Plan per NJAC 7:1E-4.1 requirements?

____ Yes X No A copy of the Plan(s) may be required at the discretion of the Department.

11. Sampling Plan Proposal

A. Is sampling proposed at the facility? X Yes (See Attachment # 3) No____

If sampling is not proposed, please explain below. *(Attach additional sheets if necessary)*

B. Is groundwater sampling proposed? ____ Yes X No

Note: If groundwater sampling is proposed under the plan, you must complete ECRA Form 002A "Request for Hydrogeologic Assessment" and submit it with the application.

12. Decontamination/Decommissioning Plan

A. Is the facility Decontamination/Decommissioning Plan enclosed?

____Yes (See Attachment #_____) __X__No

B. If no, specify why decontamination/decommissioning is not considered necessary.

The operation will continue; therefore, a decommissioning plan is not required.

13. Historical Data on environmental quality at the Industrial Establishment

A. Were sampling results obtained on Environmental Quality for the Industrial Establishment?

__X__Yes (See Attachment #__5__) ____No

B. If sampling results were obtained but are not part of this application, please explain below:

14. List any other information you are submitting or which has been formally requested by the Department:

Description	Attachment #
Material Safety Data Sheets (MSDS) for the hazardous materials listed in Items 8 and 9.	6

FEE CHECKLIST

Include below a breakdown of the total fee submitted with this application. (See N.J.A.C. 7:26B-1.10 for the appropriate fees.)

Item	Amount ($)
1. Initial Notice Review	$ 250.00
i. Without Sampling Plan	
ii. With Sampling Plan that includes only underground storage tank analysis without groundwater monitoring	
iii. With Sampling Plan other than ii. above or iv. below	
iv. With Sampling Plan that includes any groundwater monitoring	$ 500.00
2. Sampling Data Review	
3. Negative Declaration Review	
4. Cleanup Plan Review	
5. Oversight of Cleanup Plan Implementation	
TOTAL FEE ENCLOSED	$ 750.00

ARE FEES ENCLOSED? __X__ **YES**

CERTIFICATIONS:

A. The following certification shall be signed by the highest ranking individual at the site with overall responsibility for that site or activity. Where there is no individual at the site with overall responsibility for that site or activity, this certification shall be signed by the individual having responsibility for the overall operation of the site or activity.

I certify under penalty of law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-8.

Typed/Printed Name James A. Placa Title President

Signature [signature] Date 2/26/88

Sworn to and Subscribed Before Me
on this
Date of Feb 26 19 88

Marie J Cognina
Notary Expiration 1990
Essex County
I.D # 147139

B. The following certification shall be signed as follows:

1. For a corporation, by a principal executive officer of at least the level of vice president;
2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
3. For a municipality, State, Federal or other public agency, by either a principal executive officer or ranking elected official.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, 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. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate, or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-8.

Typed/Printed Name James A. Placa Title President

Signature [signature] Date 2/26/88

Sworn to and Subscribed Before Me
on this
Date of Feb 26 19 88

Marie J Cognina
Notary Expiration date 1990
Essex County
I.D. # 147139

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE GENERATOR ANNUAL REPORT 1987
- CERTIFICATION FORM -

I. EPA ID Number: NJ 0980536379

II. Generator Name: HABA INTERNATIONAL

III. Contact Person: James A. PLACA

IV. Phone Number: 201-485-4490

V. Certification:

I certify that the information given in this annual report is true, accurate and complete.

James A. PLACA
(Print or type name)

(Signature)

4.25.88
(Date)

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE GENERATOR ANNUAL REPORT 1937
- REPORT FORM -

1. Generator Name: HABA INTERNATIONAL 2. EPA ID No.: NJ0980536379
3. Site Address: 29-75 RIVERSIDE AVE. BLDG #10, NEWARK NJ 07104
4. Transporter Name: NAPPI TRUCKING 5. EPA ID No.: NJD000813477
6. TSD Facility Name: MARISOL INC 7. EPA ID No.: NJD002434544
8. TSD Address: 125 FACTORY LANE MIDDLESEX NJ 08846

9. A.) Waste Number	B.) Waste Description	C.) DOT Haz Class	D.) Total Quantity	E.) Units
F003	WASTE ACETONE FLAMMABLE LIQUID UN1090		5044	G

NOTE: For each combination of transporter and TSD facility, list the total quantity manifested for each waste type.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE GENERATOR ANNUAL REPORT 1987
- REPORT FORM -

1. Generator Name: HABA INTERNATIONAL 2. EPA ID No.: NJ0980536379
3. Site Address: 29-75 RIVERSIDE AVE. Bldg #10 NEWARK NJ 07104
4. Transporter Name: NAPPI TRANSPORT 5. EPA ID No.: NJD 000813477
6. TSD Facility Name: MICHIGAN RECOVERY SYSTEMS 7. EPA ID No.: MID 060975844
8. TSD Address: 36345 VAN BORN ROAD ROMULUS MI 48174

9. A.) Waste Number	B.) Waste Description	C.) DOT Haz Class	D.) Total Quantity	E.) Units
D001	WASTE FLAMMABLE LIQUID NOS RQ100 UN1993		2475	G

NOTE: For each combination of transporter and TSD facility, list the total quantity manifested for each waste type.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE GENERATOR ANNUAL REPORT 1987
- WASTE SUMMARY FORM -

Generator Name: HAGA INTERNATIONAL

EPA ID No.: NJ0980536379

DIRECTIONS:

Please indicate below the total quantity of hazardous waste manifested during the 1987 report year for each unit of measure. Enter the units of measure as they appeared on the manifest(s). Do not convert one form of unit of measure to another.

7519 G - Gallons (liquids only)

0 P - Pounds

0 T - Tons (2,000 lbs.)

0 Y - Cubic Yards

0 L - Liters (liquids only)

0 K - Kilograms

0 M - Metric Tons (1,000 kg)

0 N - Cubic Meters

*Enter zero (0) for units of measure which were not utilized.

PART II: 1987 WASTE MINIMIZATION REPORT DATA: SAMPLE DATA

Explanations and Sample Calculations:

New Jersey Waste Number	1986 Amt of Waste & Unit	1986 Amt Waste / Unit of Production	1987 Amt of Waste & Unit	1987 Amt Waste / Unit of Production	Unit of Production	Increase or Decrease of Amt Waste / Unit of Production	Reduction Code(s)	Disposal Code
1. F001	335 p	0.051 p/PR	420 p	0.044 p/PR	PR	-0.07 p/PR	3	RF
2. F001	0	0	53.4 g	0	—	0	11	L
3. D007	95560 g	0.039 g/SD	0	0	SD	-0.039 g/SD	5	—
4. D002	15340 p	0.020 p/PR	21943 p	0.029 p/PR	PR	+0.009 p/PR	6, 8	IF
5. X721	6970 g	0.9 g/LH	7350 g	1.0 g/LH	LH	+0.1 g/LH	12	RF

The examples of waste minimization in sample data shown in this section serve as useful guidelines for understanding how to categorize your firm s waste stream for reporting. Note that the SIC Code Source Code, Process Description and Product Produced is not shown in this section, but must be reported on the actual report form.

Explanation of Sample Data

No. 1 and No. 2 are both F001 wastes. They have been reported separately to identify stream No.1 as the waste from a manufacturing process and stream No.2 as a one time spill cleanup residue which was also classified as F001. This distinction is important to the proper reporting on a production unit basis of the amount of F001 waste actually attributable to the manufacturing process. Note that the REDUCTION CODES selected identify waste stream No.1 as being reduced on a unit basis due to equipment or technological modifications (3) and stream No.2 as a one time cleanup residue (11).

No. 3 depicts a waste stream that was eliminated entirely in 1986 by reformulating the product. This corresponds with REDUCTION CODE (5).

No. 4 depicts a waste stream that increased on a production unit basis from the prior year. REDUCTION CODES indicate that this was due to raw material substitution (6) which resulted in more waste being produced per production unit but of a less toxic nature (8).

No. 5 depicts waste oil that showed an increase in generation perproduction unit from the prior year. REDUCTION CODE (12) indicates that an explanation of this increase is attached on the SIS. Such an increase in generation could perhaps be due to falling production levels while continuing routine changes of lubricating engine oils on a periodic basis.

PART II: 1987 WASTE MINIMIZATION REPORT DATA

Explanations and Sample Calculations:

New Jersey Waste Number	1986 Amt of Waste & Unit	1986 Amt Waste / Unit of Production	1987 Amt of Waste & Unit	1987 Amt Waste / Unit of Production	Unit of Production	Increase or Decrease of Amt Waste / Unit of Production	Reduction Code(s)	Disposal Code
See NJAC 7:26-8.9 -8.16	Total Waste generated in 1986 & unit of waste	Divide Waste generated by unit of product produced	Total Waste generated in 1987 & unit of waste	Divide Waste generated by unit of product produced	PR= Product SD= Sales $ LH= Labor Hours RM= Raw Materials Used	0.044 p/PR 1987 -0.051 p/PR 1986 - 0.07 p/PR (Waste (p) reduced 0.07 per unit of production (PR))	See Pg 4 for explanation and legend	See Pg 4 for explanation and legend

Sample Data:

F006	335 p	335 p / 6000 PR = 0.051 p/PR	420 p	420 p / 9600 PR = 0.044 p/PR	PR	-0.07 p/PR	13	RF
SIC CODE for Waste Stream No 1 - 3679			Product Produced - Circuit Boards				Source Code - 1 TC	
PROCESS DESCRIPTION - Wastewater Treatment Sludge from Electroplating							PROJECTED % RED./CODE(S) - 15 % / 13,4	

* For further SAMPLE DATA and an explanation of SAMPLE DATA see Page 9. Enter your data below.

1.								
SIC CODE for Waste Stream No 1 -			Product Produced -				Source Code -	
PROCESS DESCRIPTION -							PROJECTED % RED./CODE(S) -	
2.								
SIC CODE for Waste Stream No 2 -			Product Produced -				Source Code -	
PROCESS DESCRIPTION -							PROJECTED % RED./CODE(S) -	
3.								
SIC CODE for Waste Stream No 3 -			Product Produced -				Source Code -	
PROCESS DESCRIPTION -							PROJECTED % RED./CODE(S) -	
4.								
SIC CODE for Waste Stream No 4 -			Product Produced -				Source Code -	
PROCESS DESCRIPTION -							PROJECTED % RED./CODE(S) -	
5.								
SIC CODE for Waste Stream No 5 -			Product Produced -				Source Code -	
PROCESS DESCRIPTION -							PROJECTED % RED./CODE(S) -	

10

DESCRIPTION OF OPERATIONS

HABA International utilizes the site for the manufacturing of nail polish remover and related products and occupies all four floors of the building. HABA's current operation consists of mixing, bottling, packaging and shipping of nail polish remover. Previously, HABA International had also formulated and packaged nail polishes, but has ceased this operation at this site.

Chemicals used in the production of the nail polish remover consist of acetone, ethyl acetate, dyes, fragrances, fatty acids, and lubricating oil (for equipment maintenance). Acetone and ethyl acetate are delivered by tank truck and are stored separately in two 4500-gallon above ground storage tanks located in the one-story concrete block building directly north of the main building (refer to Appendix 2-A, Site Plot Plan). The other components are stored in 55-gallon drums on the concrete floor in three areas: 1) inside the mixing room; 2) adjacent to the mixing area; and 3) in the shipping/receiving area on the second floor (see Appendix 2-B). The chemical stock is rotated into the mixing room as needed.

The mixing area is located on the third floor of the building. The nail polish remover components are mixed in the following proportions: 90% acetone or ethyl acetate, 9.9% water, 0.1% dye, fragrances, and fatty acids.

Once the nail polish remover has been mixed, it is pumped to the bottling/packaging area via overhead piping to production lines. At the present time, only three of the six production lines (lines 1, 2, and 3) are being used for packaging of the nail polish remover. Acupak, Inc., a tenant of the building, uses the three remaining production lines for packaging of nail polish. A separate General Information Submission and Site Evaluation Submission has been submitted for Acupak.

The nail polish remover comes off the production lines bottled, labeled, and packaged. It is then moved to the second floor shipping/receiving area for distribution (See Appendix 1-B).

Waste liquids (including acetone and ethyl acetate) from the operation is drummed and stored in 55-gallon drums in one of two areas: 1) the south room on the second floor; or 2) the south corner of the first floor storage area. This waste is collected for disposal by S&W Waste of South Kearny, New Jersey.

Small amounts of lubricating oil waste (approximately 1 drum/8 months) are generated during equipment maintenance activities. This waste is disposed, along with the normal waste shipments, by S&W Waste. Compressor blowdown is collected in 5-gallon pails and is added to the lubricating oil waste stream for disposal.

In 1982, five (5) floor drains were installed in the building. These drains discharged into the building's sanitary sewer lines. Since these drains were never used, they were disconnected and sealed with concrete in 1986.

ACETONE SPILL DESCRIPTION

A surface spill of acetone is located on the ground near the above ground storage tanks. The spill measures approximately 4-5 feet in diameter, and appeared to be limited to a two-inch thick sand/dirt layer above the asphalt pavement. The source of the spill is unknown; however, it is suspected that the spill is associated with the refilling operations of the above ground acetone tank.

In order to delineate the vertical extent of the spill, a soil boring (B-3) was made in the center of the spill area. Two (2) soil samples (HA-4 and HA-5) were collected from depths of 18-24 inches and 26-42 inches below grade. Refer to Appendix 1 for the boring location. Each sample was collected using a stainless steel hand auger. All samples were collected following NJDEP-approved soil sampling methods. The hand auger was thoroughly decontaminated between samples to avoid the potential for cross-contamination. Soil samples were placed in laboratory-prepared 40 ml glass vials with Teflon-lined screw caps, and were hand delivered to Accutest Laboratories of North Brunswick, New Jersey. Accutest is a New Jersey-certified analytical laboratory capable of conducting the required analyses.

Each soil sample was analyzed for volatile organics + 15 library search (EPA Method G24). The laboratory analyses results indicated the presence of 2-propanone and 2 propanol in the library search data in both samples. Copies of the laboratory analysis results are included in this Appendix and the are summarized below.

Boring No.	Sample No.	Depth (feet below grade)	Laboratory Analyses Results
B-3	HA-4	1.5-2.0	2-Propanone 3820 2 Propanol 90
B-3	HA-5	3.0-3.5	2-Propanone 300 2 Propanol 40

It should be noted that 2-propanone is a common synonym for acetone.

Based on these results, it is apparent that soil contamination exists just beneath the asphalt in the spill area and extends to a depth of 3.5 feet below grade. The decreasing concentration with depth indicates surface contamination. The volume of contaminated soil in the spill area is estimated at 5 cubic yards (cy).

Proposed Cleanup of Spill Area

The contaminated soil will be excavated by SDS Service Company of Hewitt, New Jersey under the direct supervision of a TRC geologist. The excavated soils will be disposed of as hazardous waste. During the excavating task, a Foxboro Organic Vapor Analyzer (OVA) will be used to screen the soil to insure removal of all contaminated material.

A total of three (3) confirmatory soil samples will be collected from the excavation for laboratory analysis. Each sample will be collected following NJDEP-approved sampling procedures. The soil sampling procedures will follow the procedures outlined in Appendix 4-C, Soil Sample Collection Procedures. All samples will be analyzed for volatile organics plus 15 library search.

Accutest Laboratories of North Brunswick will perform the laboratory analysis. Accutest is a New Jersey-certified analytical laboratory capable of conducting the required analyses.

All disposal manifests, trucking receipts, and laboratory analysis results will be submitted to NJDEP in a summary report. The summary report will also include sample documentation, copies

HISTORICAL SOIL SAMPLING

In January 1987, TRC conducted an environmental audit of the facility. During the audit, two (2) hand auger soil borings were attempted (B-1 and B-2) below the fill pipes of the two above ground acetone and ethyl acetate storage tanks. Boring B-1 was abandoned due to the rocky subsurface at 10 inches below grade. Boring B-2 was made and two soil samples (HA-2 and HA-3) were collected from depths of 12-18 inches and 30-36 inches below grade. Refer to Appendix A, Site Plot Plan for the soil boring locations. Each sample was analyzed for volatile organics plus 15 to determine if there were any spills below the fill pipes. The results of the laboratory analyses did not detect the presence of any volatile organic compounds in the subsurface near the fill pipes. The analytical results and samples collected are summarized below.

SUMMARY OF ANALYTICAL RESULTS

Boring No.	Sample No.	Depth (feet below grade)	Volatile Organics
B-1 (abandoned)	HA-1	6-10"	Not Analyzed
B-2	HA-2	1.0-1.5'	None Detected
	HA-3	2.5-3.0'	None Detected

Based on these results, it is apparent that no volatile organic contamination exists directly below the fill pipes of the storage tanks.

Copies of the laboratory analyses results of all samples collected at the site are included in this Appendix, as well as a copy of the Chain-of-Custody Control form. The soil sample collection procedures used at the site are also included in this Appendix.

ACCUTEST®
LABORATORIES
578 LIVINGSTON AVENUE • NORTH BRUNSWICK, N.J. 08902 • (201) 249-6100

TO: TRC Environmental Consultants, Inc.
26H Worlds Fair Drive
Somerset, NewJersey 08873

ATTN: Robert Zain

DATE: 1-30-87
JOB No.: 87-0076
P. O. No.: 3945-G54-00
SAMPLE RECEIVED: 1-8-87/9:20AM

ANALYSIS REPORT

Sample No.	Date Collected	Time Collected	Collected By	Point of Collection
0146	1-6-87	10:30	RLC	Soil sample-HA-2, B-2, stainless steel hand auger, 12-18"

Vincent J. Pugliese
ENV. LAB. MGR.

ACCUTEST®
LABORATORIES
578 LIVINGSTON AVENUE • NORTH BRUNSWICK, N.J. 08902 • (201) 249-0100

TO: TRC Environmental Consultants, Inc.
26H Worlds Fair Drive
Somerset, New Jersey 08873

ATTN: Robert Zain

DATE: 1-30-87
JOB No.: 87-0076
P. O. No.: 3945-G54-00
SAMPLE RECEIVED: 1-8-87/9:20AM

ANALYSIS REPORT

Sample No.	Date Collected	Time Collected	Collected By	Point of Collection
0147	1-6-87	10:40	RLC	Soil sample-HA-3, B-2, stainless steel hand auger, 30-36"

Vincent J. Pugliese
ENV. LAB. MGR.

ACCUTEST®
LABORATORIES
578 LIVINGSTON AVENUE • NORTH BRUNSWICK, N.J. 08902 • (201) 249-0100

TO: TRC ENvironmental Consultants, Inc.
26H Worlds Fair Drive
Somerset, New Jersey 08873

ATTN: RObert Zain

DATE: 1-30-87
JOB No.: 87-0076
P. O. No.: 3945-G54-00
SAMPLE RECEIVED: 1-8-87/9:20AM

ANALYSIS REPORT

Sample No.	Date Collected	Time Collected	Collected By	Point of Collection
0148	1-6-87	11:10	RLC	Soil sample-HA-4, B-3, stainless steel hand auger, 18-24"

Vincent J. Puglie
ENV LAB.M GR.

ACCUTEST®
LABORATORIES
578 LIVINGSTON AVENUE • NORTH BRUNSWICK, N.J. 08902 • (201) 249-0100

TO: TRC Environmental Consultants, Inc.
26H Worlds Fair Drive
Somerset, New Jersey 08873

ATTN: Robert Zain

DATE: 1-30-87
JOB No.: 87-0076
P. O. No.: 3945-G54-00
SAMPLE RECEIVED: 1-8-87/9:20AM

ANALYSIS REPORT

Sample No.	Date Collected	Time Collected	Collected By	Point of Collection
0149	1-6-87	11:25	RLC	Soil sample-HA-5, B-3, Stainless steel hand auger, 36-42"

Vincent J. Pugliese
ENV. LAB. MGR.

TRC
Environmental Consultants
2611 Worlds Fair Drive, Somerset, NJ 08873 (201) 563-1100

25 May 1988

NJ Department of Environmental Protection
Division of Hazardous Waste Management
Bureau of Industrial Site Evaluation
401 East State Street, CN. 028
Trenton, NJ 08625

Attn: Ms. Terri Smith

Re: HABA International, Inc.
29-75 Riverside Avenue, Newark
ECRA Case #88483

Dear Ms. Smith:

The purpose of this letter is to provide the Department with the information requested on the Completeness Checklist (dated 5/20/88) for the above-referenced facility. Attached please find three (3) copies of a scaled site map indicating the paved vs. unpaved areas of the property and the adjacent land usage. As shown on the map, the entire property is either paved with asphalt or covered with structures. The eastern side of the property is bordered by the Passaic River and the adjacent land use is entirely industrial.

In response to the Department's comment that the proposed cleanup of the acetone spill is considered decontamination/decommissioning, a detailed decontamination plan is enclosed as an Addendum to the Site Evaluation Submission for the above-referenced property.

We trust that this information is sufficient to consider the submission complete.

If you have any questions or require additional information, please do not hesitate to call me at (201) 563-1100.

Very truly yours,

Thomas Myers

Thomas Myers
Project Geologist

TM/mel

Enclosures

cc: J. Placa, HABA

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
BUREAU OF INDUSTRIAL SITE EVALUATION
CN 028, TRENTON, NEW JERSEY 08625
(609) 633-7141

06/08/88

Thomas Myers
TRC Environmental Consultants
27 H Works Fair Drive
Somerset, NJ 08873

Re: HABA INTERNATIONAL, INC.
29-75 Riverside Ave, NEWARK CITY, ESSEX COUNTY
ECRA Case #: 88483

This is to advise you, as the listed authorized agent, of the status of the Initial Notice submitted under the provisions of the Environmental Cleanup Responsibility Act (N.J.S.A. 13:1K-6 et seq.) Based upon our review of the most recent information provided, the attached checklist shows the status as:

General Information Submission (ECRA-1): comolete as of 05/09/88
Site Evaluation Submission (ECRA-2): complete as of 05/27/88

You should also be aware that under the Act and its associated regulations, an approvable Negative Declaration or Cleanup Plan must be provided to the Department 60 days prior to finalization of the proposed action. Since such lead time was not provided in this case, it is entirely possible that our review will not be completed by your proposed date. We recommend that you prepare appropriate contingency plans to allow for such an occurrence.

The Case Manager assigned to this case is Mike Justiniano. Please contact the Case Manager at (609) 633-7141 to schedule a site inspection

Kindly refer to the referenced case name and number in all future correspondence. Any questions you may have on this case should be directed to the assigned Case Manager.

Very truly yours,

Terri C. Smith

Terri C. Smith, Supervisor
Bureau of ECRA Applicability
and Compliance

TRC
Environmental Consultants
18 Worlds Fair Drive, Somerset, NJ 08873 (201) 563-1100

28 July 1988

NJ Department of Environmental Protection
BEECRA
401 E. State Street
CN 028
Trenton, NJ 08625

Attn: Michael Justiniano

Re: HABA International
29-75 Riverside Avenue
Newark, New Jersey
ECRA Case #88483

Dear Mr. Justiniano:

Enclosed please find two (2) copies of the Summary Report of Acetone Spill Decontamination for the above-referenced facility. Please be advised that arrangements are being made to dispose of the contaminated soil generated during the cleanup, and all trucking receipts and waste manifests will be submitted shortly. At that time, Negative Declaration Affidavits will be prepared and submitted to the Department for both HABA and Acupak (current tenant of the above-referenced property).

All efforts to expedite the review of the enclosed will be greatly appreciated. If you have any questions or comments, please do not hesitate to call me at (201) 563-1100.

Very truly yours,

Thomas Myers

Thomas Myers
Senior Geologist

TM/mel

Enclosures

Jul 29 9 17 AM '88

1.0 INTRODUCTION

The purpose of this report is to provide the Department with a summary of the decontamination activities associated with the acetone spill at the HABA International facility located in Newark, New Jersey. The field activities were conducted "at peril" following the procedures outlined in the proposed Decontamination of the Acetone Spill Plan, submitted to the New Jersey Department of Environmental Protection (NJDEP) Bureau of Environmental Evaluation and Cleanup Responsibility Assessment (BEECRA) as an addendum to the Site Evaluation Submission (SES) on 25 May 1988.

Included in this report is a summary of the field activities, confirmatory soil sampling procedures, and the laboratory analyses results. Copies of the laboratory report, Chain-of-Custody control form, and test pit log are also included in the report.

1.1 BACKGROUND INFORMATION

The HABA International facility is located at 29-75 Riverside Avenue in Newark, New Jersey. Figure 1, Site Location Map, shows the location of the facility on the United States Geological Survey (U.S.G.S.) Orange, New Jersey topographic quadrangle, 7.5 min. series.

HABA is engaged in the manufacture of nail polish remover. The operation consists of the mixing, bottling, packaging and shipping of nail polish remover. Refer to the SES for the facility for a complete description of operations. The main component of the nail polish remover is either acetone or ethyl acetate. The acetone and ethyl acetate are stored separately in

two (2) 4500-gallon above-ground storage tanks. Refer to Figure 2, Site Plot Plan for the location of the tanks and the property details.

During TRC's initial site inspection of the facility, a small spill of acetone was observed on the soils adjacent to the aboveground tanks. The spill measured approximately four (4) feet in diameter. The source of the spill was apparently related to spillage during the refilling of the acetone tank.

In order to delineate the vertical extent of the spill, a soil boring was made into the center of the spill and soil samples were collected from 18-24 inches and 36-42 inches below grade. Each sample was analyzed for volatile organics plus 15 (EPA Method 624). Refer to the SES for a complete description of the acetone spill and delineation sampling conducted on-site.

The laboratory results of the samples are summarized below on Table 1.

TABLE 1

SUMMARY OF ANALYTICAL RESULTS OF DELINEATION SAMPLING

BORING NUMBER	SAMPLE NUMBER	DEPTH (FT. BELOW GRADE)	LABORATORY ANALYSIS RESULTS (PARTS PER BILLION)	
B-3	HA-4	1.5-2.0	2-Propanone	3820
			2-Propanol	90
B-3	HA-5	3.0-3.5	2-Propanol	300
			2-Propanol	40

NOTE: 2-Propanone and 2-Propanol are synonyms for acetone.

Based on the above results, it was apparent that some soil contamination existed below the spill area to a depth of 3.5 feet below grade. In order to remediate the subsurface contamination, a decontamination plan was submitted to the Department as an addendum to the SES.

2.0 DECONTAMINATION OF ACETONE SPILL

On 23 June 1988, TRC personnel implemented the Decontamination of the Acetone Spill Plan at the HABA International facility. As noted earlier, the plan was implemented "at peril" in order to expedite compliance with the Environmental Cleanup Responsibility Act (ECRA) regulations. The following provides a detailed description of the activities associated with the acetone spill.

2.1 FIELD ACTIVITIES

SDS Service Company (SDS) of Hewitt, New Jersey performed the excavating of the acetone spill area under direct supervision of a TRC geologist. SDS utilized a John Deere backhoe to perform the excavating task. Refer to Figure 2 for the location of the spill area.

A Foxboro Organic Vapor Analyzer (OVA) Model 128GC was used to screen the soils during the soil removal. A Foxboro OVA is capable of detecting organic vapors in concentrations as low as 1 part per million. The OVA was used to help delineate the horizontal and vertical extent of the acetone during the excavating process to insure removal of all contaminated soils.

All soils were placed in DOT-regulated steel drums of 55-gallon capacity immediately upon excavation. The OVA indicated a maximum concentration of 3 parts per million of organic vapors during the soil removal. The maximum reading occurred at the

center of the spill at a depth of approximately 2.0 feet below grade.

Soil removal was discontinued when the OVA did not indicate the presence of organic vapors in the excavation. The final dimensions of the excavation measured 4 feet X 5 feet X 5 feet deep (see Figure 2). A total of 11 drums, or three (3) cubic yards of soil were removed from the spill area.

At this point, TRC personnel entered the excavation and screened the sidewalls and base of the excavation at numerous locations with the OVA; no organic vapors were detected in the excavation.

2.2 CONFIRMATORY SOIL SAMPLING

Upon completion of the excavating task, a total of three (3) confirmatory soil samples were collected for laboratory analysis, as proposed in the decontamination plan. The soil samples were collected from the base of the excavation at a depth of five (5) feet below grade using a stainless steel hand trowel. The hand trowel was thoroughly decontaminated between sampling points to avoid the possibility of cross-contamination. Refer to Appendix A, Soil Sample Collection Procedures for a complete description of the sampling procedures used at the site. It should be noted that since acetone was the parameter of concern, it was not used during the decontamination of the sampling implements. An extra rinsing with a liquinox detergent/deionized water mixture was used in the decontamination procedures in place of the acetone rinse.

All soils encountered in the test pits were logged by the on-site geologist. Refer to Appendix B for a copy of the test pit log.

Table 2 summarizes the samples collected, depth, and laboratory analysis conducted on each.

TABLE 2

SUMMARY OF SOIL SAMPLES COLLECTED FROM ACETONE SPILL EXCAVATION

SAMPLE NUMBER	DEPTH OF COLLECTION (FT. BELOW GRADE)	DATE	TIME	LABORATORY ANALYSIS
HABA-1	Travel Blank	6/23/88	0730	Volatile Organics +15 and Acetone
HABA-2	5.0	6/23/88	1155	Volatile Organics +15 and Acetone
HABA-3	5.0	6/23/88	1159	Volatile Organics +15 and Acetone
HABA-4	5.0	6/23/88	1206	Volatile Organics +15 and Acetone
HABA-6	Field Blank	6/23/88	1213	Volatile Organics +15 and Acetone

As shown above, each sample was analyzed for volatile organics plus 15 and acetone. Accutest Laboratories of Dayton, New Jersey conducted the required analyses. Accutest is a New Jersey-certified analytical laboratory capable of conducting the required analyses. A copy of the Chain-of-Custody Control Form is included as Appendix C of this report.

The analytical results of the samples did not indicate the presence of acetone or any volatile organic compounds. No additional peaks were detected in the non-priority pollutant library search. A copy of the complete laboratory analyses results, including all of the required quality assurance/quality control (QA/QC) data is included as Appendix D.

Based on the analytical results of the samples collected from the excavation, it is reasonable to conclude that all of the soils contaminated with acetone were successfully removed and the spill no longer represents an area of environmental concern.

2.3 QUALITY ASSURANCE/QUALITY CONTROL SAMPLES

As part of TRC's standard Quality Assurance/Quality Control (QA/QC) procedures, field and travel blanks were prepared for the sampling program. The field blank consisted of organic-free water (distilled) which was poured over the stainless steel hand trowel into laboratory-prepared sampling containers at the completion of the field sampling. Analysis of the field blank would indicate any contamination from the sampling equipment, sample containers, or from the atmosphere. Travel blanks are sample containers filled with organic-free water that are carried into the field with the sampling containers. The travel blank containers are not opened, but are indicative of any contamination that may have occurred in transport to the laboratory. All sample bottles used at the site were prepared and provided by Accutest Laboratories of Dayton, New Jersey.

The field and travel blanks were analyzed for volatile organics plus 15 and acetone. No volatile organic compounds were detected in either sample. Refer to Appendix D for the laboraory analysis results of the samples.

2.4 SOIL DISPOSAL

As noted earlier, a total of 11 drums of contaminated soil were excavated from the spill area. All of the material will be disposed of as hazardous waste, as required by the NJDEP Division of Hazardous Waste Management. At this time, we are arranging for disposal of the soils.

Metropolitan Disposal Services of Morristown, New Jersey will be retained to provide for disposal of the drums. All trucking receipts and disposal manifests will be submitted to NJDEP upon receipt.