

**Technical Review Panel (TRP)  
Decision Document  
Site Remediation and Waste Management Program**

Panelists: Barry Frasco, Assistant Director, Hazardous Site Science Element  
Ed Putnam, Assistant Director, Remedial Response Element  
Wayne Howitz, Assistant Director, Responsible Party Remediation Element

Remediating Parties: Indalex  
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Date of Request: 6/16/04  
Date of Meeting: 8/17/04

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Site Address: Mideast Aluminum (Parent company Indalex, Inc.)  
2300 Route 130  
South Brunswick Township  
Middlesex County  
ISRA Case #: E92007  
PI: 004641

**Disputed Technical Issue(s) Per Technical Review Request:**

Mideast Aluminum raises the following issues:

Concrete Tank Area of Concern (AOC)

The Department's requirements for additional delineation

The Department's requirements to amend a deed notice of this AOC.

**Relevant Regulations:** N.J.A.C. 7:26E

**Pertinent Information Considered:**

Remedial Investigation Workplan dated: November 15, 1995

Department Response dated: May 7 1996

Remedial Action Workplan Addendum dated: May 27, 1999

Departmental Response dated: October 14, 1999

Remedial Action Workplan dated: September 4, 1998

Departmental Response dated: April 19, 1999

Request for Technical Review Panel letter dated June 16, 2004

**Decision of Technical Review Panel:** Due to the sites close proximity to a Well Head Protection Area (WHPA), the Department is requiring that groundwater be evaluated for the concrete tank AOC. The TRP requests that a copy of the recorded deed notice be sent to the DEP.

**Background**

Mideast Aluminum  
2260 Route 130  
South Brunswick, NJ  
ISRA Case No. E92007

The Mideast Aluminum (Mideast) site is located on a 15.74-acre parcel in South Brunswick, Middlesex County. Mideast purchased the site in 1959 from Elmer Griggs who used the land for farming operations. Mideast operated aluminum extruding, fabricating, and anodizing plant from 1959 to 1994. Mideast ceased operations at the site in 1994. All buildings have been demolished and the property has been graded for redevelopment. The future use of the site is an auto dealership. A ground water pump & treat system operated onsite from late 1970's until early 1990's treating chlorinated volatile organic contamination.

**Concrete Tank AOC –**

In January 1995 during demolition of the floor slab of the Extrusion Building, a circular concrete septic tank-like structure was discovered beneath the floor of the southwest corner of the Extrusion Building. Initial sampling of sludge contained within this tank found 18,000 ppm of total petroleum hydrocarbon (TPHC) contamination.

According to Mideast's RIW dated November 15, 1995, Mideast excavated an area 20 feet by 30 feet to a depth of 19 to 25 feet below ground surface (bgs). Samples collected from the base at 22 feet bgs identified TPHC contamination at 50,000 ppm. Four sidewall samples collected at 17 and 19 feet bgs all identified TPHC above the 10,000 ppm total organic cap (TOC), with a range of 32,000 to 47,000 ppm.

In correspondence dated April 19, 1999, the Department approved Mideast's remedial action workplan for soils. Mideast performed eight borings, which were drilled to the ground water table to investigate the horizontal and vertical extent of TPHC contamination. Two samples were collected from each boring and analyzed for TPHC. Additionally, two samples were analyzed via Method 8015. The samples collected were biased toward highest suspected contamination based on field observations. A total of 18 samples were collected and analyzed for TPHC. One sample result was greater than 10,000 ppm TOC, CT-B7-B at 27,300 ppm TPHC. In addition, sample CT-B7-AA indicated a result of 5,000 ppm. The remaining sample results were either at non-detectable levels or less than 403 ppm. Fingerprint analyses revealed the following:

CT-B7-AA – hydraulic oil, nearly identical to the gas chromatograph of Mobil DTE-24 hydraulic oil, which was used by Mideast;  
CT-B7-B – most closely resembled a mixture of heavy residual fuel oil and lube/mineral oil, which is how DTE-24 hydraulic oil would appear as it degrades.

The Department, in correspondence dated May 7, 1996, approved Mideast's proposal to monitor wells MW-5, MW-7, MW-10 and MW-15 to evaluate whether waste hydraulic oil for this AOC impacted groundwater. The Department based this decision upon previous soil sampling performed for this AOC which showed levels of volatile organic compounds (VO+10), priority pollutant metals (PPM) and polychlorinated biphenyls (PCBs) below the impact to ground water criteria (IGWC) and Residential Direct Contact Soil Cleanup Criteria (RDSCC). The Department approved Mideast's proposal to only sample for base neutral compounds (BNs) instead of priority pollutants for this AOC.

Mideast analyzed monitoring wells MW-5, MW-10 and MW-15 for BNs via EPA Method 625. No BN compounds were detected in these three samples. Based upon this finding, Mideast proposed to deed restrict an area of approximately 300 cubic yards which contained residual TPHC contamination ranging from 27,300 up to 50,000 ppm and located at depths of 19 to 23 feet below ground surface.

The Department responded in correspondence dated April 19, 1999. Based on the facts that BNs had not been detected in groundwater, the make-up of the residual hydraulic oil contamination was of a degraded nature, and the depth of the contamination was between 19 and 23 feet below ground surface, the Deed Notice proposal was appropriate.

The Department advised Mideast to make changes to the proposed deed notice and to submit it for departmental approval prior to recording the notice with the county office.

In correspondence dated October 14, 1999 the Department reconfirmed its findings noted in the April 19, 1999 letter and agreed that a deed restriction was acceptable for this AOC but required an additional change to the draft deed notice concerning the monitoring and maintenance of the engineering control. Mideast completed this change. In June of 2003, Mideast (Indalex) submitted a revised deed notice to the DEP based on changes to DEP's deed notice format and indicated that they expected to re-execute and record the deed notice with the county clerk. The TRP requests that a copy of the recorded deed notice be sent to the DEP.

The following table represents the delineation sampling performed for this AOC.

<b><u>Sample ID</u></b>	<b><u>Depth (ft. bgs)</u></b>	<b><u>TPHC (mg/kg)</u></b>
CT-B1-A	12.5 – 13.0	ND
CT-B1-B	22.5 – 22.0	ND
CT-B2-A	12.0 – 12.5	86
CT-B2-B	23.7 – 24.2	ND
CT-B3-A	12.5 – 13.0	40.3
CT-B3-AB	22.0 – 22.6	27.6
CT-B3-B	23.5 – 24.0	ND
CT-B4-A	12.5 – 13.0	ND
CT-B4-B	23.8 – 24.3	ND
CT-B5-A	12.5 – 13.0	ND
CT-B5-B	23.3 – 23.8	ND
CT-B6-A	11.8 – 12.3	44.2
CT-B6-B	23.2 – 23.7	ND
CT-B7-AA	12.5 – 13.0	5,000
CT-B7-A	13.9 – 14.4	403
CT-B7-B	21.5 – 22.0	27,300
CT-B8-A	12.5 – 13.0	78.7
CT-B8-B	22.5 – 23.0	ND
CT-SIDE	6.0 – 6.0	ND
CT-EX-19'N	19.0 – 19.5	47,000
CT-EX-19'E	19.0 – 19.5	41,000
CT-EX-19'S	19.0 – 19.5	32,000
CT-EX-19'W	19.0 – 19.5	44,000
CT-EX-22—CENTER	22.0 – 22.5	50,000

### **Decision Rationale for Delineation**

The Technical Review Panel is basing its decision that the horizontal and vertical extent of ground water contamination for this AOC has not been sufficiently delineated. Specifically, samples CT-B5-A, CT-B5-B, CT-B4-A, CT-B4-B, CT-B3-A, CT-B3-B, CT-B2-A, CT-B2-B, CT-B1-A, CT-B1-B, CT-B6-A, CT-B6-B and CT-B8-A, CT-B8-B represent horizontal and vertical areas where TPHC contamination have been either not detected or are below 100 ppm. However, a significant concentration of contaminants exists below the groundwater table. Groundwater was encountered, based upon boring

logs, at approximately 22 feet bgs. At 22 feet bgs, 50,000 ppm of TPHC is reported to remain at this depth. The closest monitoring wells MW-10, MW-5 and MW-15 did not detect any base neutral contaminants considered indicators of the breakdown products of the oil, however, these wells were not installed specifically to monitor this AOC. The closest downgradient well (MW-5) is located approximately 130 feet from this AOC. The Technical Review Panel has determined that the concrete tank AOC requires additional investigation of the groundwater based upon the levels of contaminants remaining below the water table and due to the site's close proximity to a Well Head Protection Area (WHPA).

The Technical Review Panel in accordance with N.J.A.C. 7:26E-3.7(c)3 requires that a monitoring well be installed within the footprint of the tank excavation if possible, or within 10 feet of the downgradient direction of groundwater flow for this AOC. The well construction and location will be approved by the case team prior to installation. The well will be monitored for free product, volatile organics and base neutral extractable organics. The purpose of this well will be to ensure that free product or dissolved phase contaminants are not impacting groundwater. If after two rounds of sampling, free product is not observed and the groundwater quality standards are not exceeded for the constituent parameters, the Department will issue a no further action for this AOC.