

Honeywell 101 Columbia Rd Morristown, NJ 07962

February 6, 2012

Mr. Tom Cozzi, Assistant Director New Jersey Department of Environmental Protection Site Remediation Program 401 East State Street, P.O. Box 420, Mail Code 401-06 Trenton, NJ 08625-0420

RE: Master Schedule for Honeywell-Assigned Sites
Consent Judgment dated September 7, 2011
NJDEP v. Honeywell International Inc., Occidental Chemical Corporation, and
PPG Industries, Inc., No. C-77-05 (N.J. Super. Ct. Ch. Div. filed Sept. 7, 2011).

Dear Mr. Cozzi:

Honeywell is submitting for NJDEP review and approval the attached Master Schedule pursuant to Paragraph 23B of the referenced Consent Judgment ("Consent Judgment"). Additionally, by this letter Honeywell is communicating its election of review procedures and remediation approach for the sites assigned to Honeywell as well as sites shared between Honeywell and PPG (Shared Sites). The following attachments are provided with this submittal:

Attachment A: Master Schedule

Attachment B: Site Location Map and Reference Site Tables

ELECTION OF REVIEW PROCEDURES

Honeywell has elected Heightened NJDEP Review pursuant to Paragraph 24 of the Consent Judgment. Accordingly, the schedule provides for 90 days for NJDEP review of document submittals.

HONEYWELL AND PPG SHARED SITES

For the 10 Shared Sites shown on Exhibit A of the Consent Judgment, following discussions with PPG, Honeywell is planning to take the lead for implementation of investigation and remediation. This will be done subject to a cost sharing agreement still to be worked out with PPG. As specified in the Consent Judgment, each company will bear 50% of the cost of investigation and remediation for the Shared Sites.

MASTER SCHEDULE OVERVIEW

The Master Schedule addresses the following sites:

- Honeywell ACO Sites: 21 sites grouped into 7 Study Areas (SAs) known as SA-1 through SA-7
- Honeywell-Assigned Orphan Sites: 32 sites (including 10 Honeywell/PPG Shared Sites)

The overall schedule depicts key remedial investigation (RI) and remedial action (RA) activities and related document submittals as required by the Consent Judgment. The schedule takes into consideration various factors such as the number of sites, the complexity of the various sites, the level of existing information and the current RI/RA work being performed at Honeywell's ACO Sites. The proposed schedule balances the need for a reasonable timetable for RI/RA work at the Orphan Sites with a realistic understanding of the requirements of the NJDEP Technical Requirements for Site Remediation (TRSR) and review procedures set forth in the Consent Judgment. During the Consent Judgment negotiation, there was discussion of the need

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to have the ability to propose a schedule that would enable the responsible parties to integrate the new requirements into existing workloads without causing major disruption.

HONEYWELL ACO SITES: STUDY AREAS 1 TO 7

The Honeywell ACO Sites include 7 SAs comprising 21 sites. Current remediation status and anticipated remaining work at these sites is summarized as follows:

SA-1 College Towers: Post-RA monitoring (cap inspections, groundwater monitoring) is ongoing and expected to continue for the foreseeable future. NJDEP approved the Remedial Action Report (RAR) and a RA Permit for Soils was issued during 2011. It is anticipated that a restricted use no further action (NFA) letter for the capped area will be issued by NJDEP in the near future.

SA-2 Site 144 Bayonne Pipeline: This site consists of 3 pipeline sections designated as Line A, B and C. Initial RI activities were previously completed and documented in a RI Report dated March 2000. Additional RI delineation sampling at Line A was completed in 2007-2008 and along portions of Line C during 2010. Further RI work is being performed at Lines B & C and is expected to continue through 2012. Remedial actions were completed at portions of Line C including an area in the southern portion in 2002 and what is referred to as the Stanco property in 2007. IRMs have also been completed along portions of Lines A, B and C. Remedial action at Line A is expected to be conducted during 2012 in conjunction with a proposed redevelopment project. Remedial actions for remaining portions of Lines B and C will be determined following completion of RI activities.

SA-2 Site 166 Route 440 Extension: A RAR was resubmitted to the NJDEP in November 2010. Following NJDEP review of the RAR, it is anticipated that the Deed Notice will be recorded and a RA Soil Permit issued to address post-RA monitoring (cap inspections), and that NJDEP will issue a restricted use NFA letter for the site.

SA-3 Communipaw Jug: RI work has been completed. Remedial actions are anticipated to take place in coordination with adjacent Honeywell-assigned Orphan Sites (Sites 68, 69, 70, 130). The schedule reflects such a coordinated remedial approach for these sites.

SA-4 Foodtown: Remedial actions were completed in 2009 and no further action is required.

SA-5 Sites:

Site 79 Route 440 Vehicle Corp.: Remedial actions were completed in 2010. A RAR was submitted to the NJDEP in September 2011. It is anticipated that NJDEP will issue a restricted use NFA letter for this site.

Sites 090/184 Baldwin Steel/M.I. Holdings (New Jersey City University [NJCU] Property) and Site 153 Morris Canal (North Portion): Remedial actions were completed during 2010-2011. A RAR is being prepared and is planned to be submitted to the NJDEP during March 2011.

Site 153 Former Morris Canal (South Portion Upper and Lower Segments): Remedial actions were completed at Site 153 Lower Segment in 2009 and Upper Segment in 2011. A combined RIR and RASR/RAWP for Site 153 is planned to be submitted in March 2012 and will address site-wide RI delineation, summarize remedial actions completed to date. This report will include proposed remedial actions at several adjacent offsite properties.

Site 117 Former Ryerson Steel (Home Depot Property): The NJDEP previously issued a NFA for soils and post-RA cap inspections and biennial reporting are ongoing. Groundwater issues are being addressed as

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part of the SA-7 regional groundwater remedy and SA-5 Consent Decrees. Post-RA monitoring is being addressed as part of Long Term Monitoring Plans in accordance with the SA-5 Consent Decrees.

SA-6: RA design and permitting activities are in progress. Remedial actions are planned at SA-6 North and South during 2013-2015.

SA-7: Remedial actions for soils were completed in 2009. The regional groundwater extraction and treatment system remedy was initiated in December 2008 and is expected to continue for the foreseeable future. A groundwater injection source reduction program is planned to start in 2012 and continue for up to 5 years. Sediment remedial actions are also planned during 2012-2013.

HONEYWELL-ASSIGNED ORPHAN SITES

The Master Schedule addresses 32 Honeywell-assigned Orphan Sites, which include 26 sewer sites (including 6 sites with partial sewer component) and 6 non-sewer sites (see Attachment A). To allow for organized project execution and management, the sites were organized into five groups based on various factors including site type (sewer or non-sewer sites), location, complexity, current remediation phase, and designated responsible party (Honeywell sites; Honeywell/PPG Shared Sites). Also attached is a site location map and reference tables including site list, site groupings and initial document submittals (see Attachment B).

Group 1 includes sewer sites on the east side of Jersey City in the RI phase; existing data and reports indicate additional soil and/or groundwater sampling is needed for completion of the RI. Group 2 includes sewer sites mainly on the west side of Jersey City, mostly in the RI phase with additional soil and/or groundwater investigation needed to complete the RI. Group 3 includes non-sewer sites on the east side of Jersey City with the RI substantially complete, thus these sites may proceed with submittal of a RASR/RAWP. Group 4 includes shared Honeywell/PPG sites, mainly in the pre-RI phase with limited existing data. Group 5 includes non-sewer sites on the west side of Jersey City in the RI phase and Droyer's Point Groundwater.

Group	General Category	Status	Site Number
1	Sewer Sites on East Side	RI	7, 19, 667, 91, 92, 93, 100, 183
2	Sewer Sites on West Side	RI	94, 97, 98, 99, 101, 172, 180a*, 187*
3	Non-Sewer Sites, East Side	RI- Complete	178, 185, 206
4	Sewer Sites – Shared	Pre-RI	188*, 189*, 196*, 197*, 198*, 199*, 200*, 205*
5	Non-Sewer Sites, West Side	RI	68, 69, 70, 130; 119

^{*} Indicates Honeywell/PPG Shared Site

In accordance with the Consent Judgment, the Master Schedule establishes timeframes for the performance of each phase of remediation including Preliminary Assessment (PA), Site Investigation (SI), Receptor Evaluation (RE), Remedial Investigation (RI), and Remedial Action (RA); and Completion of Remediation, as applicable, and submission of the following key documents: RI Report (RIR), Remedial Action Selection Report (RASR), Remedial Action Work Plan (RAWP) and Remedial Action Report (RAR). Other requirements that may be applicable will be determined based on the results of the PA/Receptor Evaluation (RE) or during the RI phase, such as control of ongoing sources of contamination, establishment of interim remedial measures (IRM) and/or addressing immediate environmental concern (IEC) conditions. The schedule includes submittal of a Master RI Work Plan addressing work elements that are common to all sites including Sampling and Analysis Plan (SAP), Quality Assurance Project Plan (QAPP), and Data Management Plan (DMP). RI work plan documents will be prepared for each grouping of sites and will include the technical rationale for the investigation and a brief focused document per site including sampling plan summary table and figure showing proposed sampling locations.

The schedule provides for completion of site investigation and remediation work, as summarized below.

Year	Activity	
2012-2014	PA/Receptor Evaluation Reports; RI Work Plans (all sites)	
	RASR/RAWPs for Group 3 (3 sites)	
2013-2018	RI Field Work/RI Reports (all sites); RA Field Work (Group 3)	
2016-2021 RASR/RAWPs; RA Design/Permitting; RA Field Work (Groups 1,		
2019-2023	RASR/RAWPs; RA Field Work (Group 4)	

Key Assumptions

- 1. The Master Schedule was prepared in accordance with paragraph 23B of Consent Judgment and establishes remediation timeframes for investigation/remediation activities and document submittals pursuant to the NJDEP Technical Requirements for Site Remediation.
- 2. The duration of activities is estimated taking into consideration existing site information. Some sites have limited existing data regarding extent of contamination; the schedule may need to be revised following RI completion and development of remedial action work plans.
- 3. Receptor Evaluation Reports will be completed for all sites. For sites in the RI phase with existing Background Investigation Reports (BIR) and Site Characterization Reports (SCR) (Groups 1, 2, 3 &5), the schedule assumes that PA/SI requirements have been addressed and that sites can proceed with submittal of RIWP or RIWP Addendum documents to address completion of RI delineation requirements (Group 1, 2 & 4) or otherwise proceed to the RA phase with submittal of RASR/RAWP (Group 3). For sites in the pre-RI phase that do not have existing BIR/SCR reports (Group 4), a combined PA/SI would be completed (using existing soil data to satisfy SI requirements) and submitted with the Receptor Evaluation Report.
- 4. Field work related activities are estimated and contingent on NJDEP review/approval of work plans, obtaining site access approvals and remediation agreements with property owners, and regulatory permits. Multiple work plans and reports being submitted to NJDEP concurrently may affect review times and overall schedule. Schedule does not include additional time for response to NJDEP comments on submittals and may require adjustment in the future as a result of any of the above considerations.
- 5. Remedial actions for sewer sites will follow the Sewer Protocol as indicated in Exhibit B of the Consent Judgment. Remediation schedule for sewer sites is estimated and contingent on coordination with the Jersey City Municipal Utilities Authority (JCMUA) and other property owners.
- 6. Site 165 Tempesta & Sons is not included in the schedule since NJDEP has the lead for any additional remediation if required at this site; Honeywell has financial obligation only up to the amount specified in Paragraph 14 of the Consent Decree.
- 7. ACO Sites/Study Areas: schedule includes key regulatory tasks and deliverables. For Study Areas 5 and 6, refer to separate Consent Decree schedules for other activities and details.
- 8. Study Area 2: Remedial action schedule is estimated at this time based on the nature of the site (3 pipeline sections), complexity and multiple property owners. Remedial action schedule to be updated following completion of RI and submittal of RASR/RAWP and may include separate schedules for different portions of the pipeline.
- 9. Study Area 3: Remedial action schedule is coordinated with adjacent Orphan Sites (Group 5 Communipaw Sites) for submittal of RASR/RAWP and implementation of remedial actions.
- 10. Post-RA requirements (e.g., Deed Notice, CEA, RA permits, post-RA monitoring) are shown on the schedule as placeholder reference. Post-RA requirements and timing will be determined following implementation of remedial actions.

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Master Schedule: Honeywell-Assigned Orphan Sites and ACO Sites

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Some sites may require potentially longer timeframes depending on issues such as obtaining site access and remediation agreements with property owners. If appropriate, Honeywell will meet with NJDEP prior to finalizing reports to present the findings and recommendations and obtain concurrence for site remediation to minimize document review and revision.

If you have any further questions, please feel free to call me at 973-455-4003.

Sincerely,

John I Morris

Remediation Director

Enclosures:

Attachment A: Master Schedule

Maria Kanuis

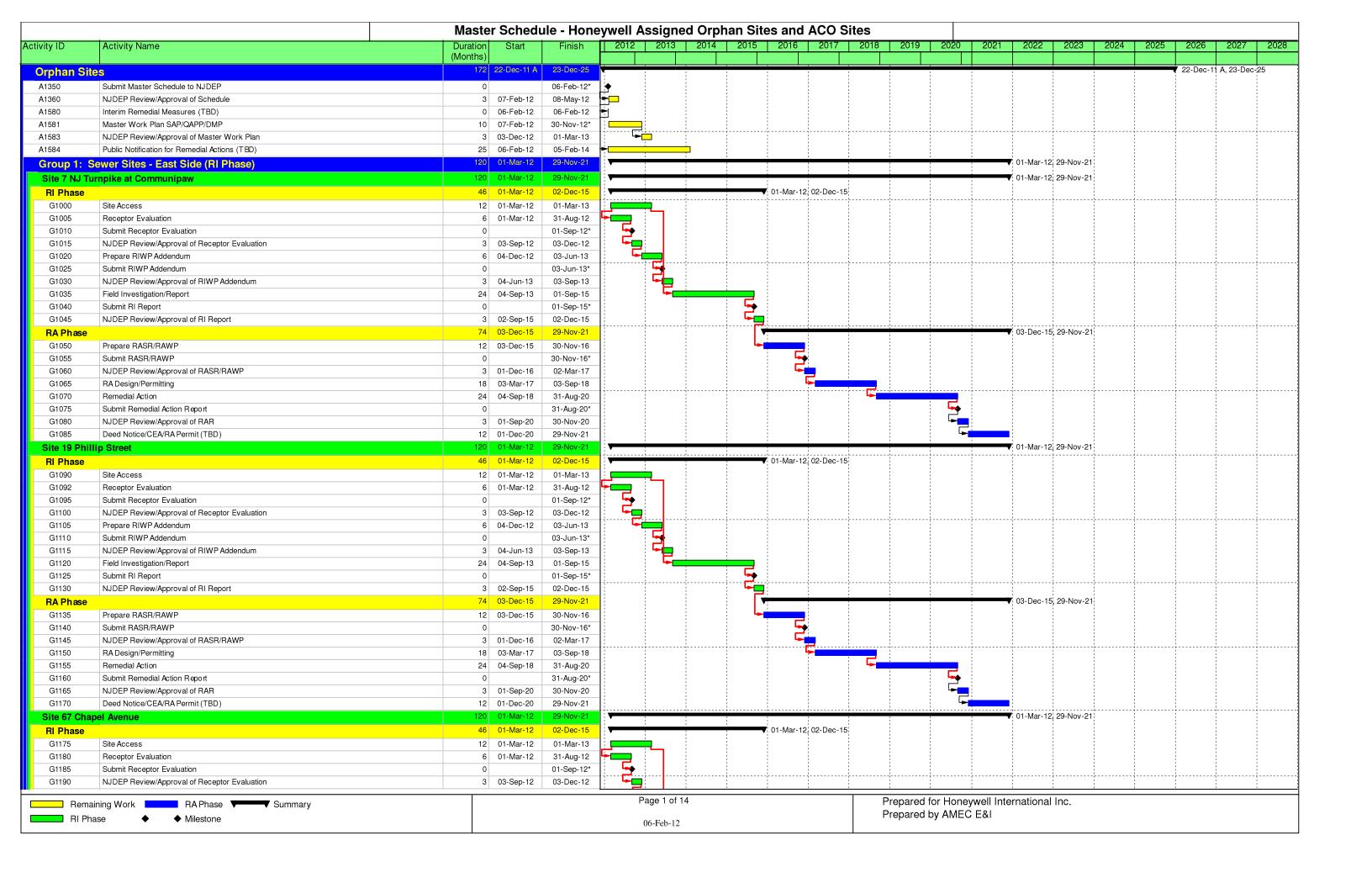
Attachment B: Site Location Map, Reference Site Tables

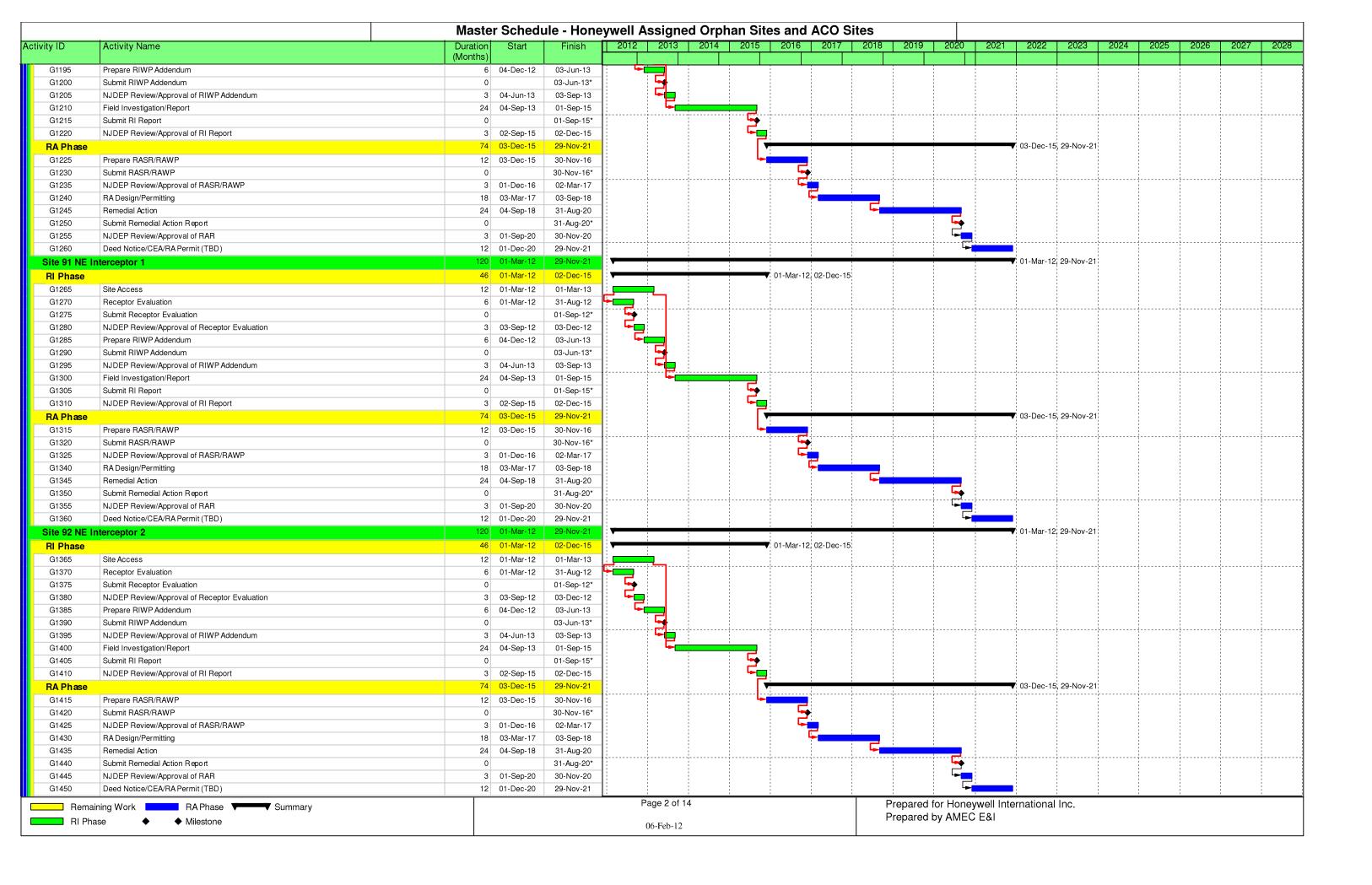
cc: Joe Clifford – Amec

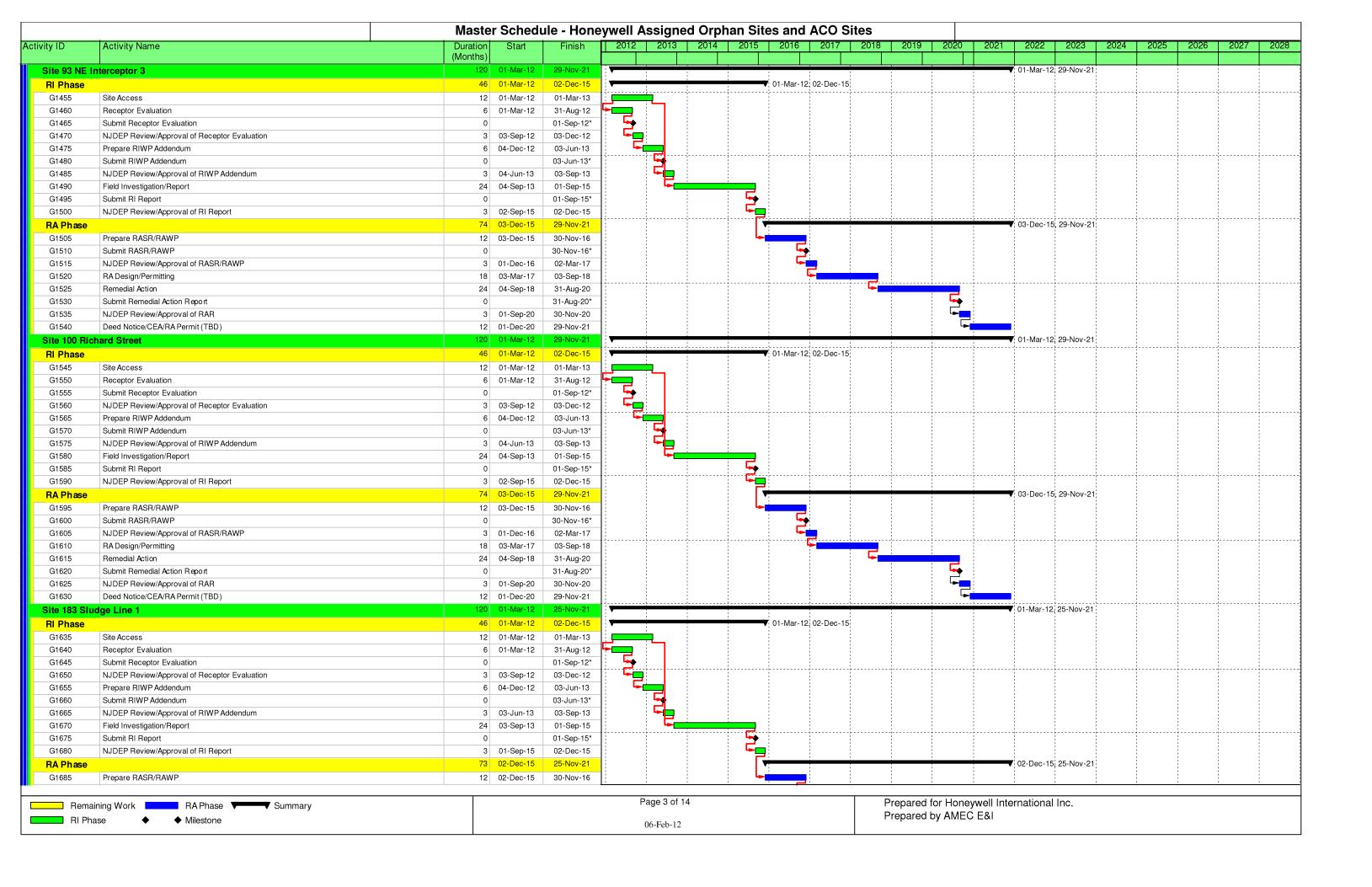
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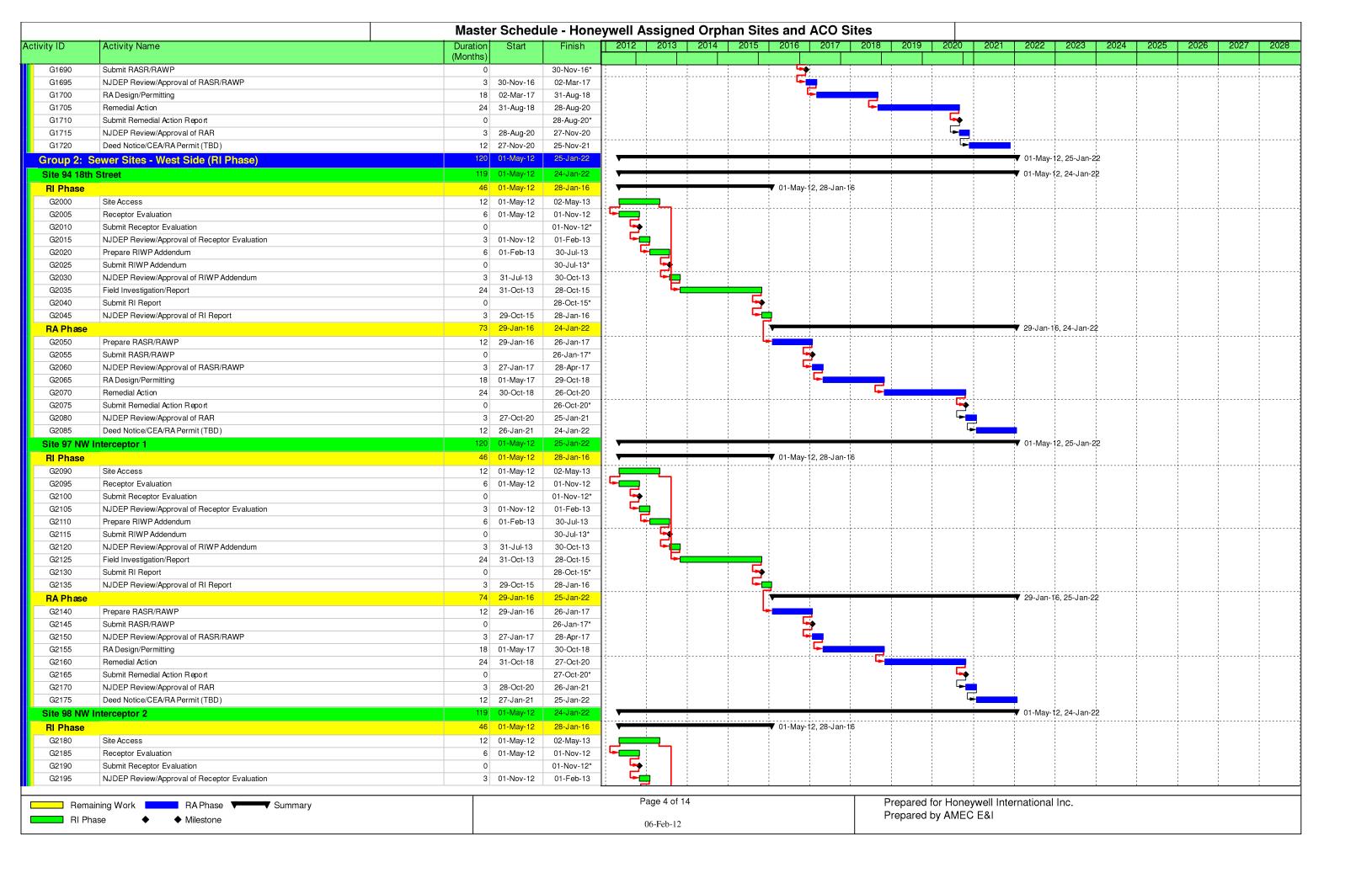
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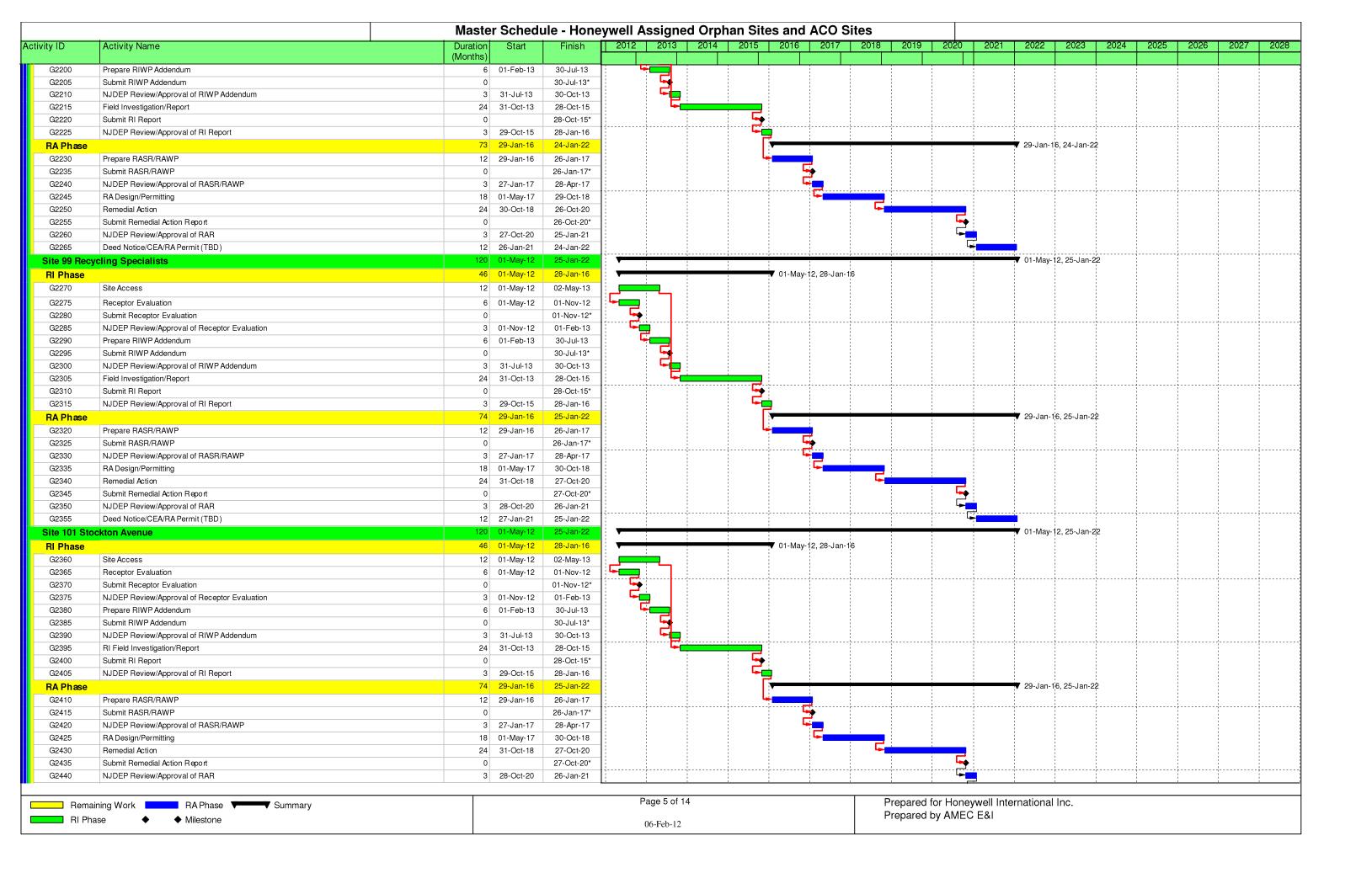
Tom Byrne – Honeywell Maria Kaouris – Honeywell William Hague – Honeywell Leonard Romino – NJDEP

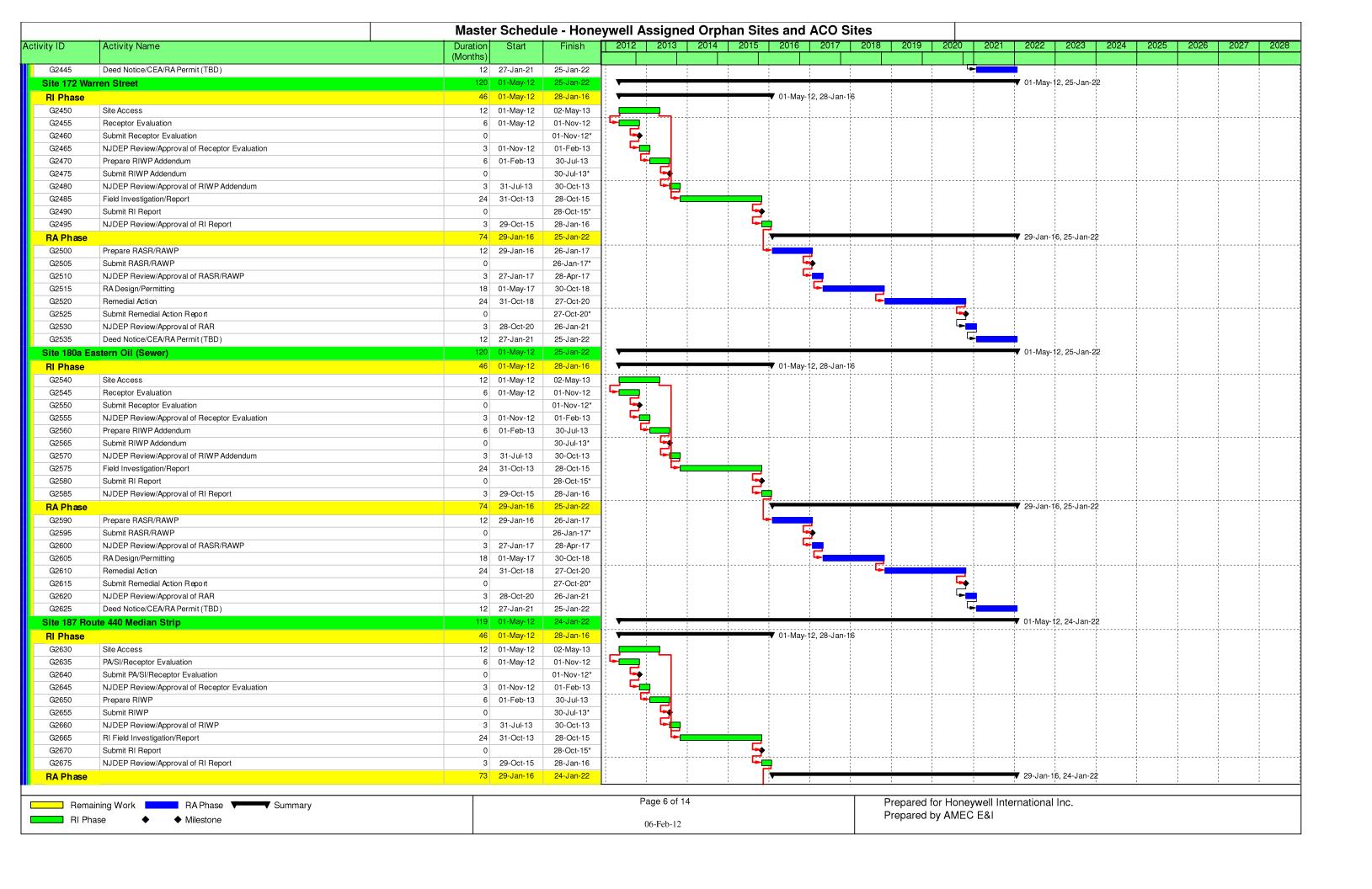


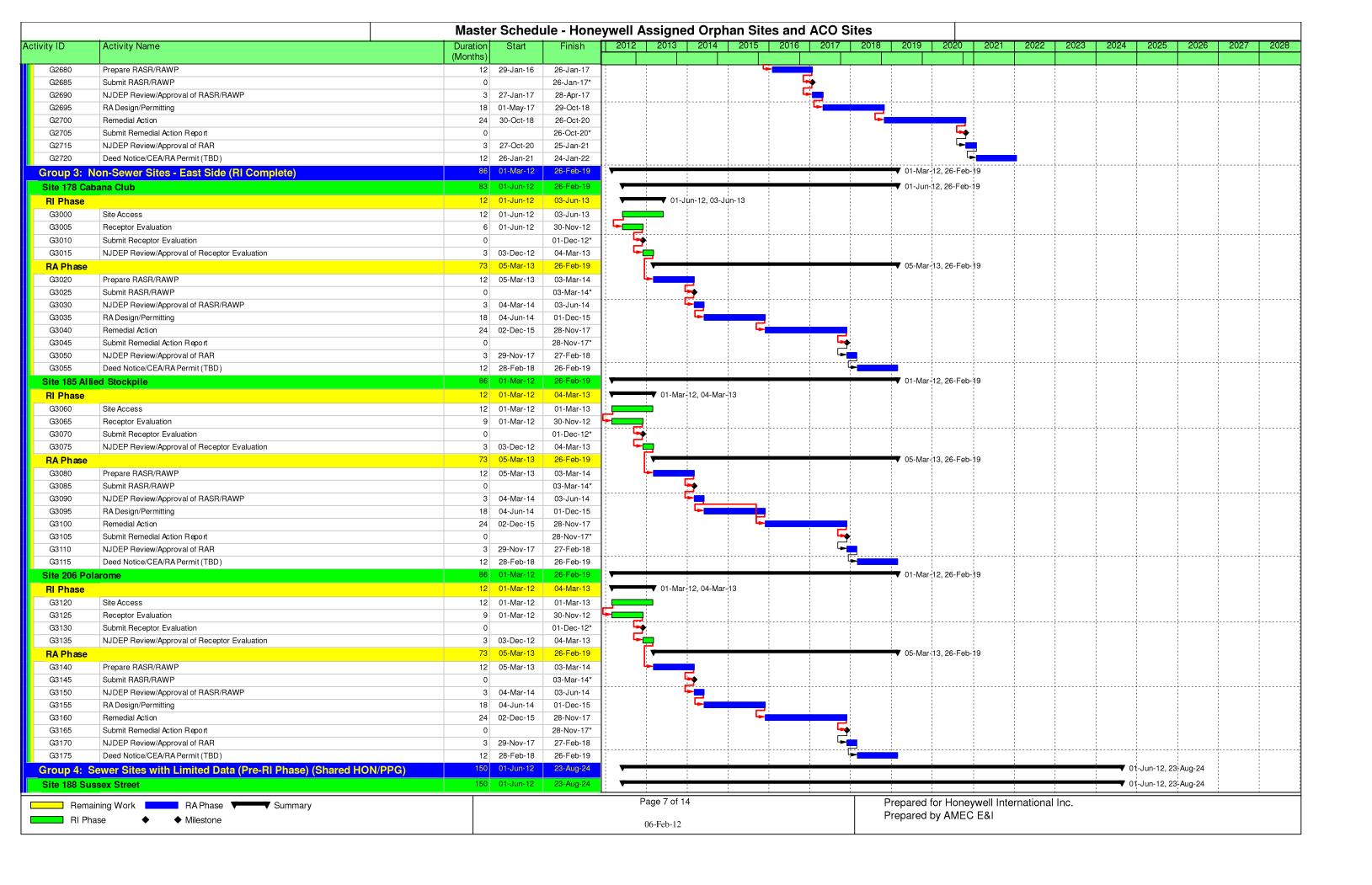


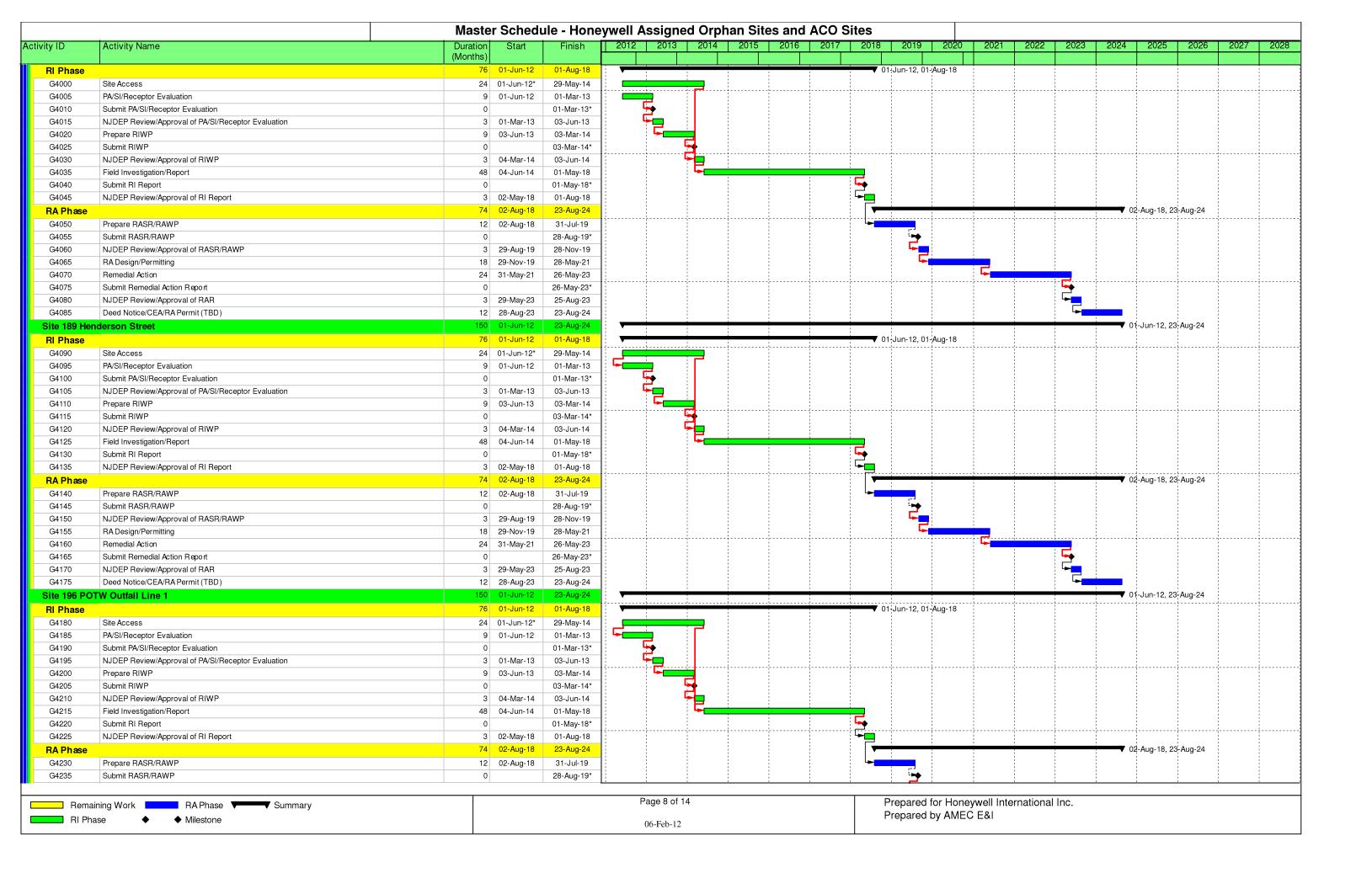


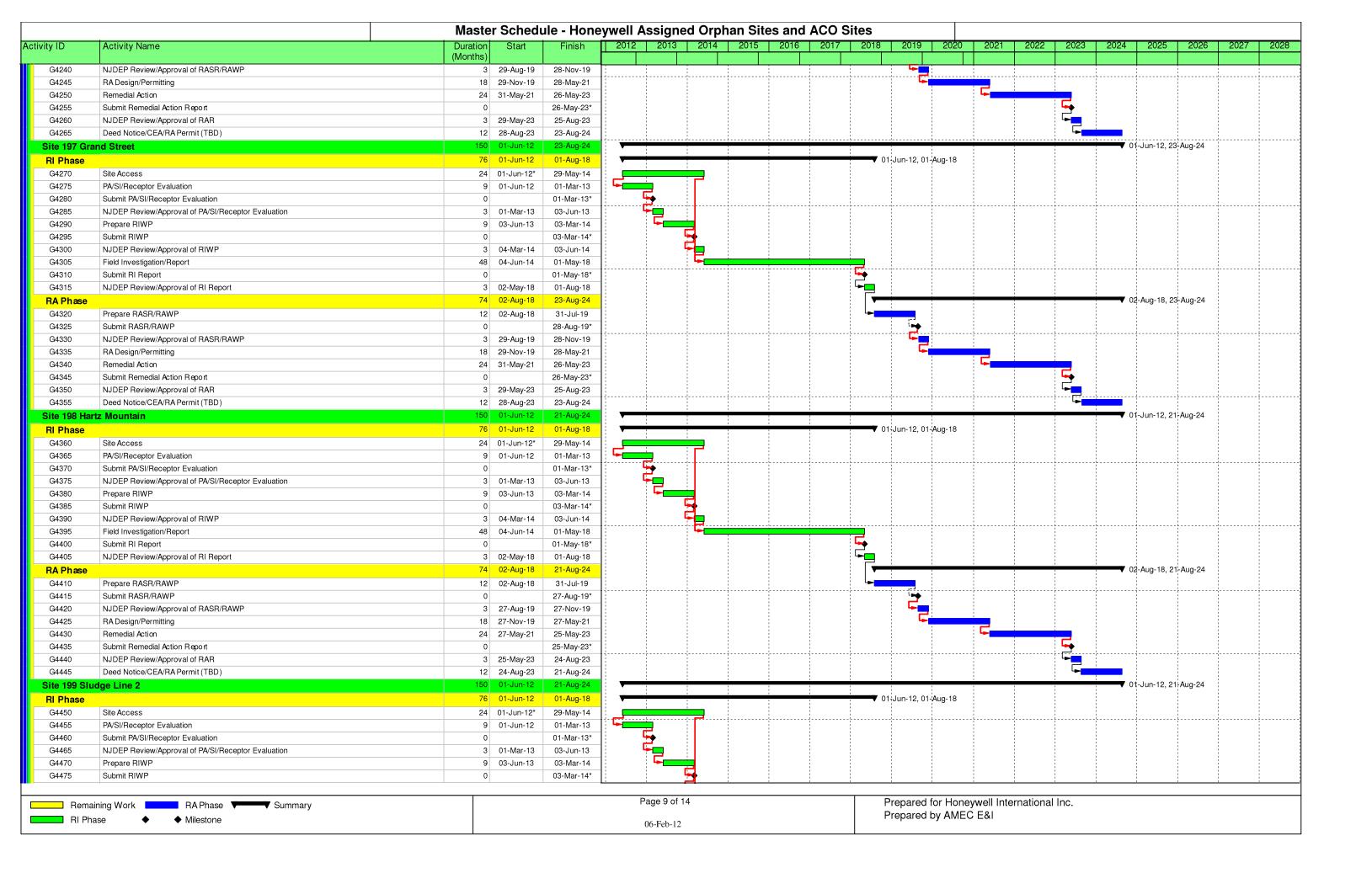


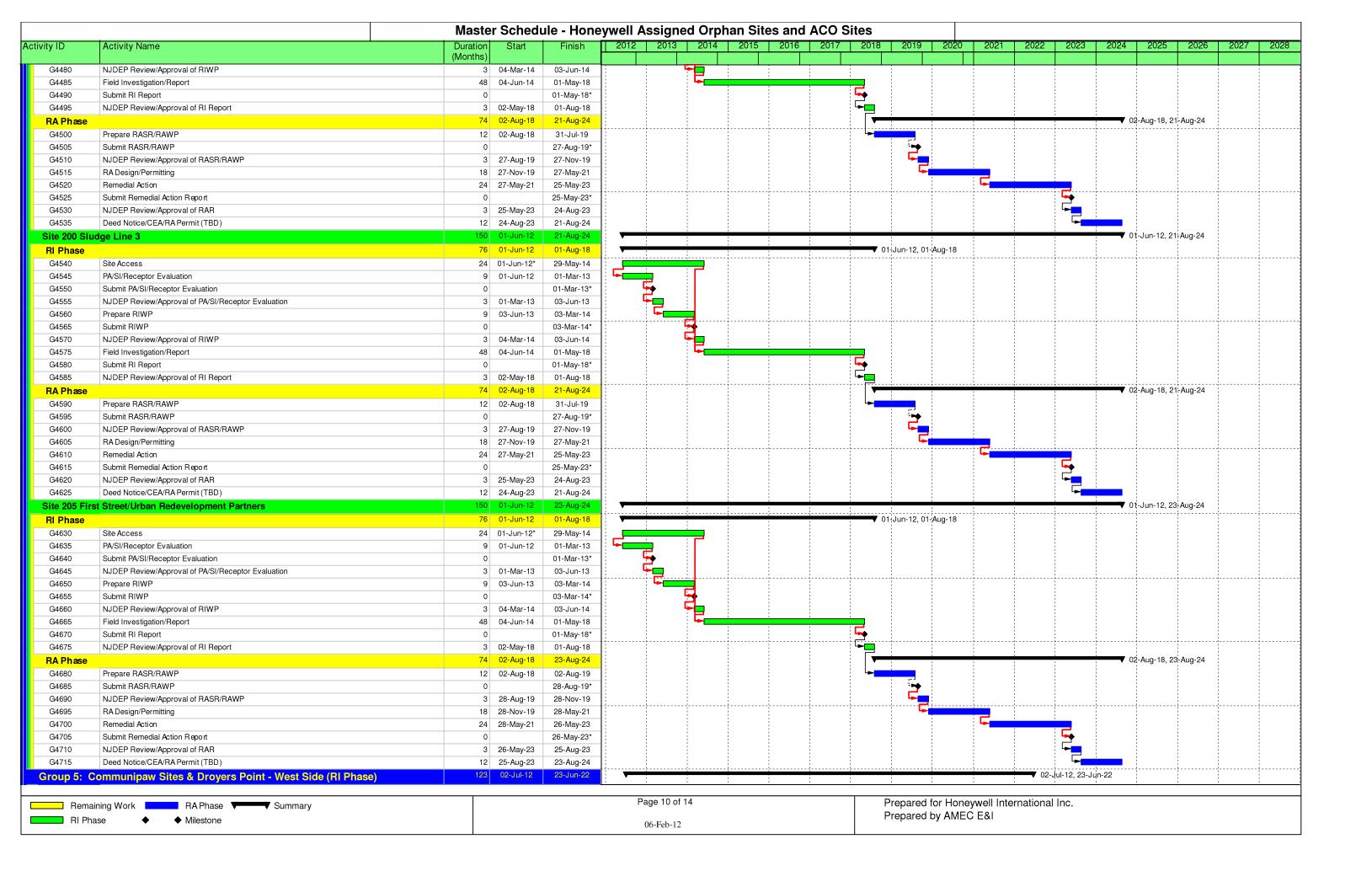


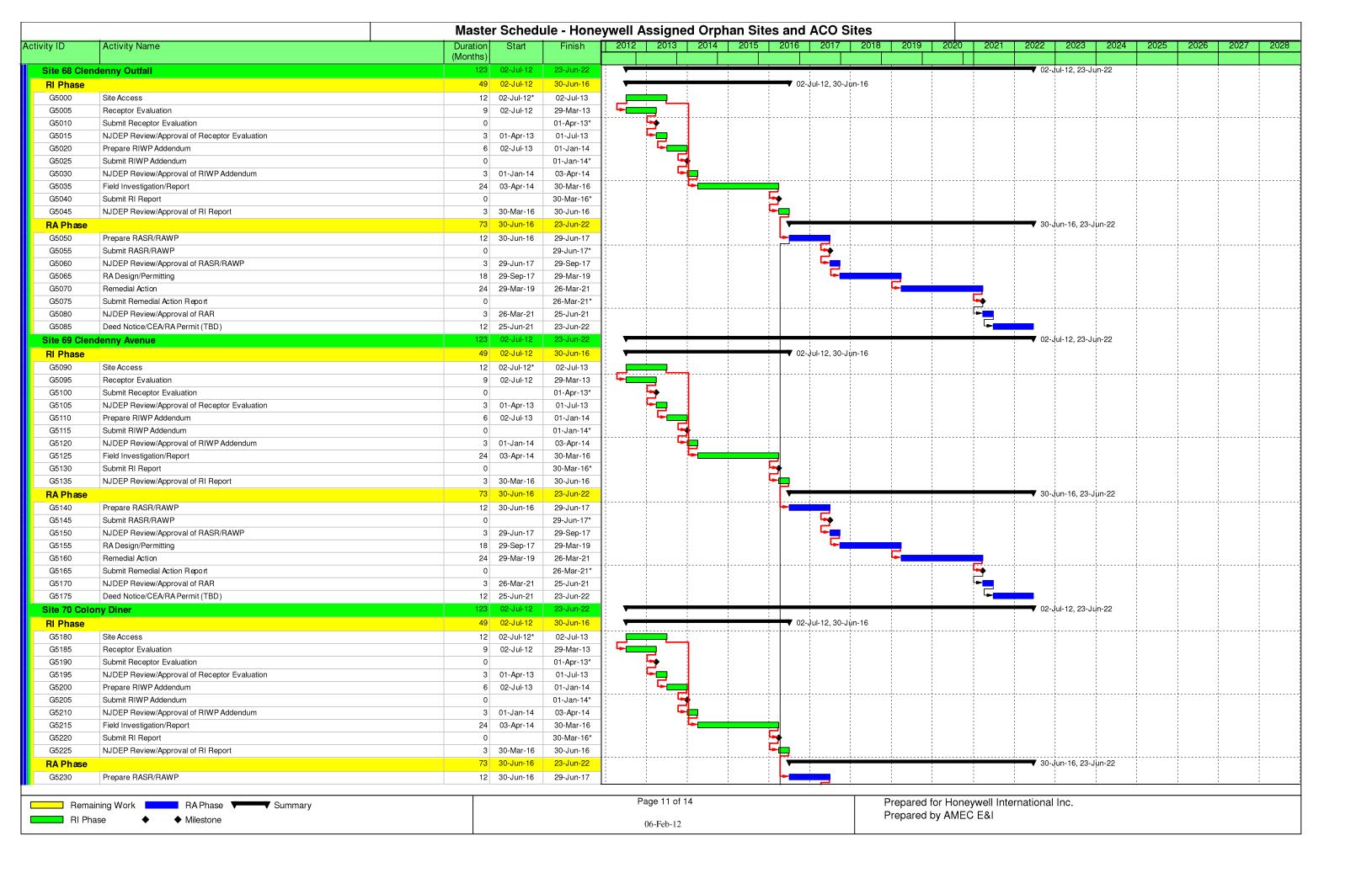


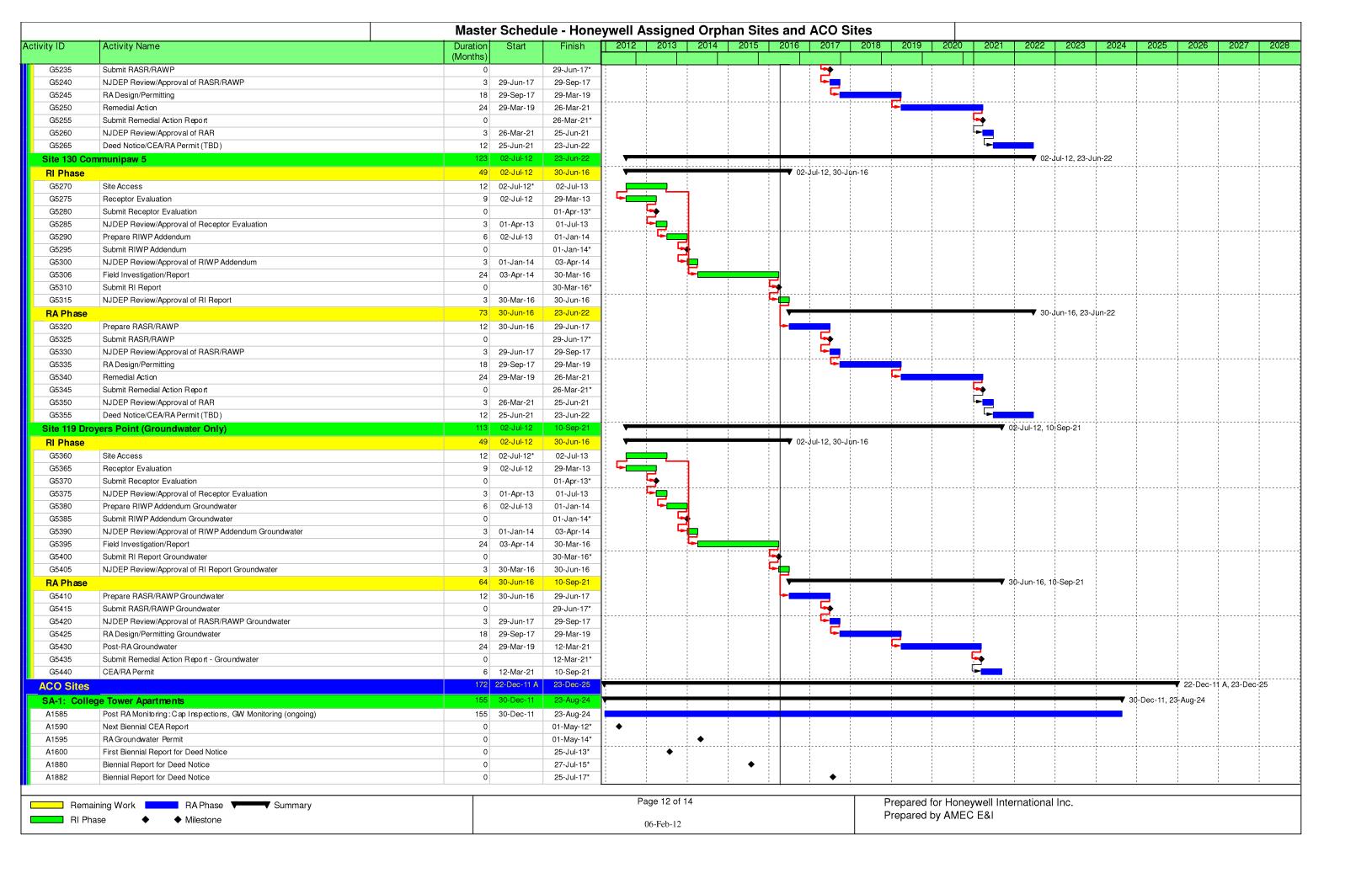


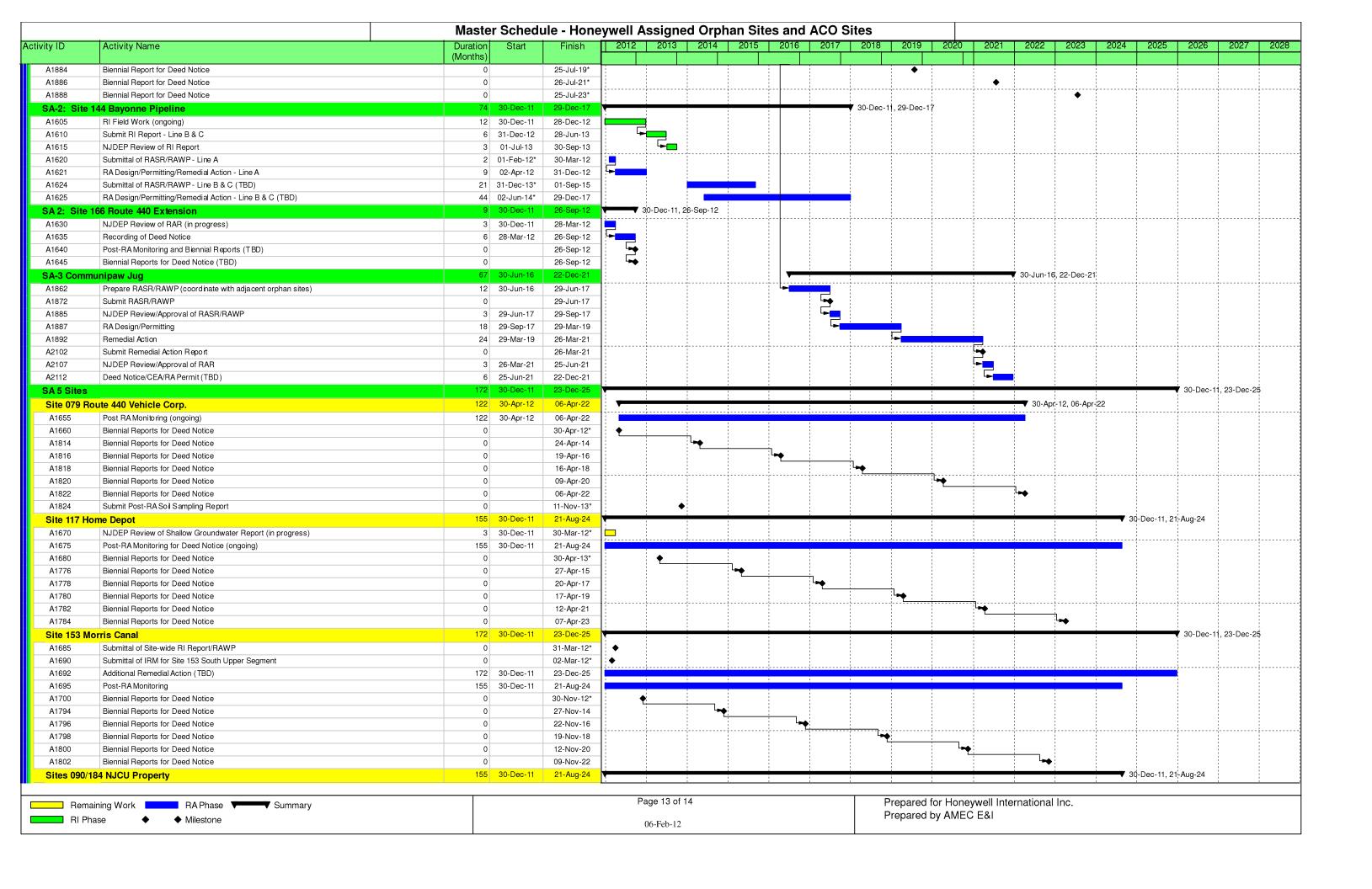


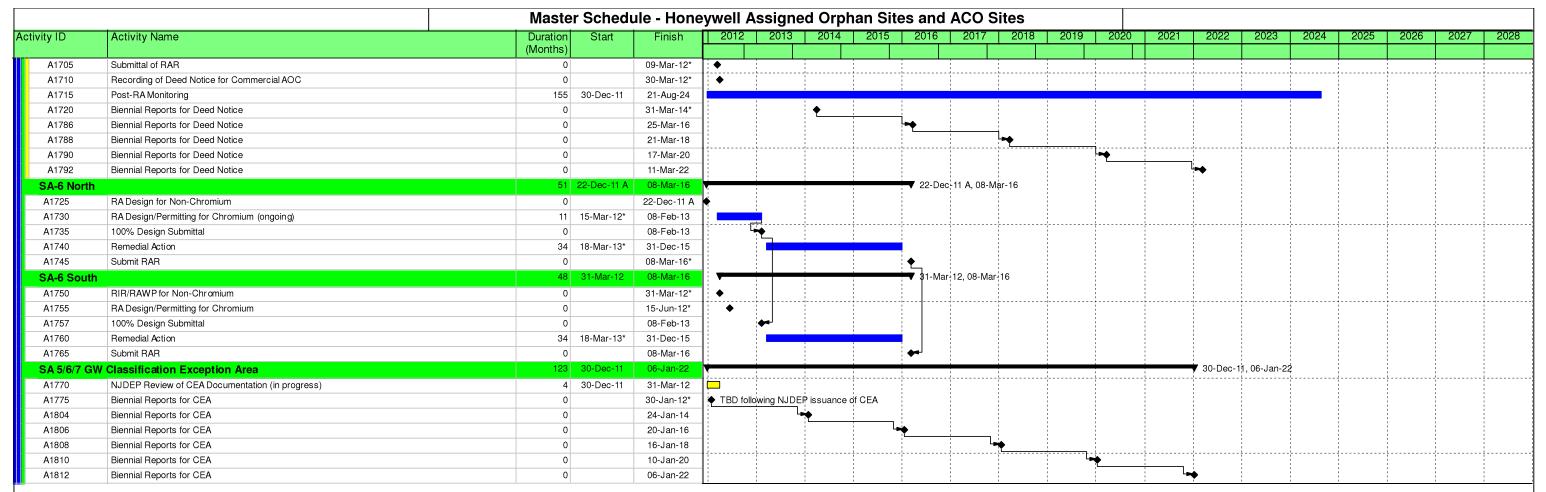






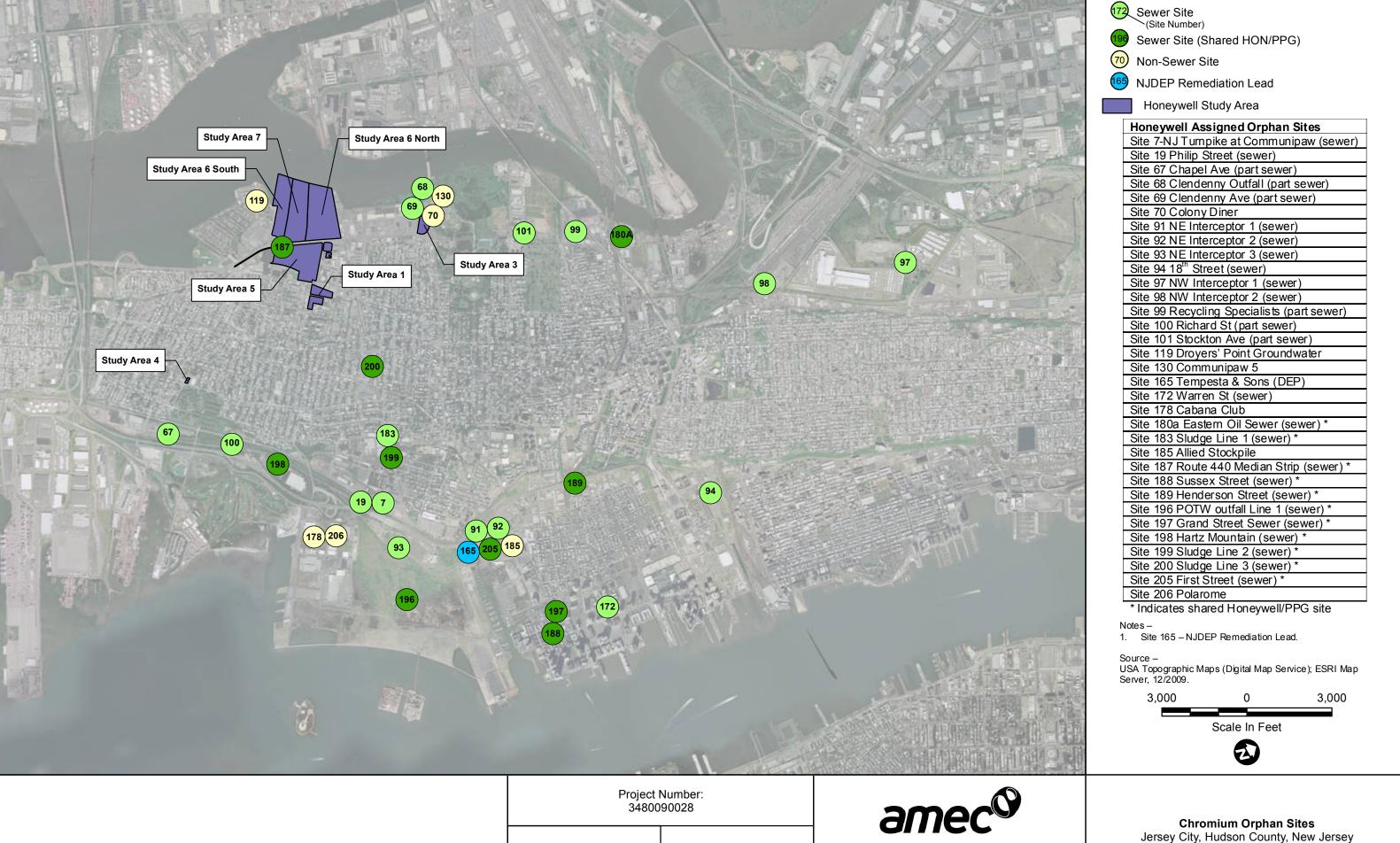






Notes and Assumptions

- 1. Master Schedule was prepared in accordance with paragraph 23B of Consent Judgment dated 9/7/11 and establishes remediation timeframes for investigation/remediation activities and document submittals pursuant to the NJDEP Technical Requirements for Site Remediation. The schedule includes 90 days for NJDEP review of document submittals.
- 2. The duration of activities is estimated taking into consideration existing site information. Some sites have limited existing data regarding extent of contamination; the schedule may need to be revised following RI completion.
- 3. Receptor Evaluation Reports will be completed for all sites. For sites in the RI phase with existing Background Investigation Reports (BIR) and Site Characterization Reports (SCR) (Groups 1, 2, 3 & 5), the schedule assumes that PA/SI requirements have been addressed and that these sites can proceed with submittal of RIWP documents to address completion of RI requirements (Group 1, 2 & 5) or othewise proceed to the RA phase with submittal of RASR/RAWP (Group 3). For sites in the pre-RI phase that do not have existing BIR/SCR reports (Group 4), a combined PA/SI will be completed (using existing soil data to satisfy SI requirements) and submitted with the Receptor Evaluation Reports.
- 4. Field work related activities are estimated and contingent on NJDEP review/approval of work plans, obtaining site access approvals and remediation agreements with property owners, and regulatory permits. Multiple work plans and reports being submitted to NJDEP concurrently may affect review times and overall schedule. Schedule does not include additional time for response to NJDEP comments on submittals.
- 5. Remedial actions for sewer sites will follow the Sewer Protocol as indicated in Exhibit B of the Consent Decree. Remediation schedule for sewer sites is estimated and contingent on coordination with Jersey City Municipal Utilities Authority (JCMUA) and other property owners.
- 6. Site 165 Tempesta & Sons is not included in the schedule since NJDEP has the lead for any additional remediation if required at this site; Honeywell has financial obligation only up to the amount specified in Paragraph 14 of the Consent Decree.
- 7. ACO Sites/Study Areas: schedule includes key regulatory tasks and deliverables. For Study Areas 5 and 6, refer to separate Consent Decree schedules for other activities and details.
- 8. Study Area 2: Remedial action schedule is estimated at this time due to the nature of the site (3 pipeline sections), complexity and multiple property owners. Remedial action schedule to be updated following completion of RI and submittal of RASR/RAWP and may include separate schedules for different portions of the pipeline.
- 9. Study Area 3: Remedial action schedule to be aligned with adjacent Orphan Sites (Group 5 Communipaw Sites) for submittal of RASR/RAWP and implementation of remedial actions.
- 10. Post-RA requirements (e.g., Deed Notice, CEA, RA permit) are shown on the schedule as placeholder reference. Post-RA requirements and timing will be determined following implementation of remedial actions.



Checked/Date:

EGG 01/04/2012

Prepared/Date:

WSL01/04/2012

ENVIRONMENT & INFRASTRUCTURE 200 AMERICAN METRO BLVD, SUITE 113 HAMILTON, NEW JERSEY 08619

Legend

TABLE B-1
HONEYWELL-ASSIGNED ORPHAN SITES

SITE	Honeywell	PPG	Sewer
Site 7-NJ Turnpike at Communipaw	Х		S
Site 19 Phillip Street	Х		S
Site 67 Chapel Ave	Х		S (part of site)
Site 68 Clendenny Outfall	Х		S (part of site)
Site 69 Clendenny Ave	X		S (part of site)
Site 70 Colony Diner	Х		
Site 91 NE Interceptor 1	Х		S
Site 92 NE Interceptor 2	Х		S
Site 93 NE Interceptor 3	Х		S
Site 94 18 th Street	Х		S
Site 97 NW Interceptor 1	Х		S
Site 98 NW Interceptor 2	Х		S
Site 99 Recycling Specialists	Х		S (part of site)
Site 100 Richard St	Х		S (part of site)
Site 101 Stockton Ave	X		S (part of site)
Site 119 Droyers' Point Groundwater	Х		
Site 130 Communipaw 5	Х	-	
Site 165 Tempesta & Sons	X (DEP)		
Site 172 Warren St	Х		S
Site 178 Cabana Club	Х		
Site 180a (Eastern Oil Sewer)	Х	X	S
Site 183 Sludge Line 1	X		S
Site 185 Allied Stockpile	X		
Site 187 Route 440 Median Strip	Х	Х	S
Site 188 Sussex Street	X	Χ	S
Site 189 Henderson Street	X	X	S
Site 196 POTW outfall Line 1	Х	X	S
Site 197 Grand Street Sewer	Х	X	S
Site 198 Hartz Mountain	X	Х	S
Site 199 Sludge Line 2	X	X	S
Site 200 Sludge Line 3	X	X	S
Site 205 First Street/Urban Redevelopment	X	Χ	S
Site 206 Polarome	X		

S = sewer sites as designated in Appendix F of Consent Judgment DEP = Site 165 Tempesta: NJDEP is remediation lead (Honeywell financial obligation only)

TABLE B-2 SITE GROUPINGS FOR MASTER SCHEDULE

GROUP/SITE	Remediation Status /					
	Anticipated Initial Key Document Submittals					
Group 1: Sewer Sites - East Side (RI Pha	ase)					
Site 7-NJ Turnpike at Communipaw	RI Phase; submit RE & RIWP Addendum					
Site 19 Phillip Street	RI Phase; submit RE & RIWP Addendum					
Site 67 Chapel Ave (part sewer)	RI Phase; submit RE & RIWP Addendum					
Site 91 NE Interceptor 1	RI Phase; submit RE & RIWP Addendum					
Site 92 NE Interceptor 2	RI Phase; submit RE & RIWP Addendum					
Site 93 NE Interceptor 3	RI Phase; submit RE & RIWP Addendum					
Site 100 Richard St (part sewer)	RI Phase; submit RE & RIWP Addendum					
Site 183 Sludge Line 1	RI Phase; submit RE & RIWP Addendum					
Group 2: Sewer Sites – West Side (RI Phase)						
Site 94 18 th Street	RI Phase; submit RE & RIWP Addendum					
Site 97 NW Interceptor 1	RI Phase; submit RE & RIWP Addendum					
Site 98 NW Interceptor 2	RI Phase; submit RE & RIWP Addendum					
Site 99 Recycling Specialists (part sewer)	RI Phase; submit RE & RIWP Addendum					
Site 101 Stockton Ave (part sewer)	RI Phase; submit RE & RIWP Addendum					
Site 172 Warren St	RI Phase; submit RE & RIWP Addendum					
Site 180a Eastern Oil Sewer*	RI Phase; submit RE & RIWP Addendum					
Site 187 Route 440 Median Strip*	Pre-RI Phase; submit PA/SI/RE & RIWP					
Group 3: Non-Sewer Sites on East Side ((RI Complete)					
Site 178 Cabana Club	RI complete; submit RE & RASR/RAWP					
Site 185 Allied Stockpile	RI complete; submit RE & RASR/RAWP					
Site 206 Polarome	RI complete; submit RE & RASR/RAWP					
Group 4: Sewer Sites with Limited Data	(Pre-RI Phase) [Shared Honeywell/PPG]					
Site 188 Sussex Street*	Pre-RI; submit PA/SI/RE & RIWP					
Site 189 Henderson Street*	Pre-RI; submit PA/SI/RE & RIWP					
Site 196 POTW outfall Line 1*	Pre-RI; submit PA/SI/RE & RIWP					
Site 197 Grand Street Sewer*	Pre-RI; submit PA/SI/RE & RIWP					
Site 198 Hartz Mountain*	Pre-RI; submit PA/SI/RE & RIWP					
Site 199 Sludge Line 2*	Pre-RI; submit PA/SI/RE & RIWP					
Site 200 Sludge Line 3*	Pre-RI; submit PA/SI/RE & RIWP					
Site 205 First Street/Urban	Pre-RI; submit PA/SI/RE & RIWP					
Redevelopment*						
Group 5: Non-Sewer Sites on West Side	(RI Phase)					
Site 68 Clendenny Outfall (part sewer)	RI Phase; submit RE & RIWP Addendum					
Site 69 Clendenny Ave (part sewer)	RI Phase; submit RE & RIWP Addendum					
Site 70 Colony Diner	RI Phase; submit RE & RIWP Addendum					
Site 130 Communipaw 5	RI Phase; submit RE & RIWP Addendum					
Site 119 Droyer's Point Groundwater	Post-RA; submit RIWP for Groundwater					

Notes:

- * Indicates Honeywell/PPG shared site
 Site 165 Tempesta not shown: DEP remediation lead (HON financial obligation only).