



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Risk Management, Initial Notice, and Case Assignment
ISRA Initial Notice

P.O. Box 435
401 East State Street, 5th Floor
Trenton, NJ 08625-0435

DEC - 7 2006

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

Joseph N. Schmidt, Jr., Esq.
Drinker Biddle & Reath LLP
105 College Road East
Suite 300, PO Box 627
Princeton, NJ 08542-0627

Re: Detrex Corporation
835 Industrial Highway, Unit #1, Cinnaminson, Burlington County
ISRA Case #20060436

Dear Sir:

This letter serves to advise you as the authorized agent for Detrex Corporation, that the New Jersey Department of Environmental Protection (Department) has received a complete Industrial Site Recovery Act (ISRA) General Information Notice (GIN).

Detrex Corporation is required to complete all applicable remediation activities following the minimum requirements set forth at N.J.A.C. 7:26E, the Technical Requirements for Site Remediation, which became effective February 3, 2003. It is expected that these remediation activities will be **completed** within the time frames indicated on the Detrex Corporation GIN, as required pursuant to N.J.A.C. 7:26B-3.3(a)10i or ii. Should Detrex Corporation determine that it is necessary to deviate from the expected schedule of implementation, then Detrex Corporation shall submit a revised schedule of implementation for the completion of each phase of the investigation. The remedial activities shall be conducted as specified below:

1. The **completion** of a Preliminary Assessment (PA) in accordance with N.J.A.C. 7:26E-3.1 and the **submission** of a PA Report as per N.J.A.C. 7:26E-3.2 along with a Negative Declaration, as long as no areas of concern are identified in the PA that require the completion of a Site Investigation. If a site investigation is necessary do not submit the PA Report until the site investigation is complete. Please note failure to disclose and address all areas of concern can result in unnecessary case delays. Please refer to N.J.A.C. 7:26E-1.8 to ensure that all areas of concern have been identified. The PA form can be downloaded from the Department's Internet website at <http://www.state.nj.us/dep/srp/isra/forms.htm>;

or

2. If the Preliminary Assessment indicates areas of concern that require further investigation, the **completion** of a Site Investigation (SI) in accordance with N.J.A.C. 7:26E-3.3 through 3.12 and the **submission** of the PA Report and the SI Report (PA/SI) in accordance with N.J.A.C. 7:26E-3.13 along with a Negative Declaration, as long as the SI reveals no contamination above applicable remediation standards or criteria;

or

3. If the PA/SI reveals contaminants with levels above applicable remediation standards or criteria and those contaminants require further delineation and/or remediation, the **completion** of a Remedial Investigation (RI) Workplan prepared in accordance with N.J.A.C. 7:26E-3.2, 3.13 and 4.2, and the **submission** of the PA Report, the SI Report and the RI Workplan for Department review and approval, or the **submission** of the PA Report, SI Report and a schedule to implement the RI Workplan without Department oversight.

Please note all reports submitted to the Department will not be reviewed unless they are submitted with the required review fee pursuant to N.J.A.C. 7:26B-8. Furthermore, if during any phase of remediation, Detrex Corporation discovers that a discharge has occurred, then Detrex Corporation is required to immediately notify the assigned ISRA case manager at the number listed below. If the case manager is not available, Detrex Corporation shall notify the Department through the Spill Hotline at 1-877-927-6337.

Please be advised that all applicable remediation activities shall comply with the minimum requirements set forth at N.J.A.C. 7:26E, the Technical Requirements for Site Remediation which became effective February 3, 2003.

Furthermore, the Technical Regulations require electronic data submittal of all analytical results. All data submitted shall conform to the "Reduced Laboratory Deliverables Format" consistent with the guidance contained in the Tech Rules. The data shall be presented as a hard copy and an electronic deliverable format using one of the following:

- a. Use of the Hazardous Site Information Application (HazSite),
- b. Submittal in a Lotus-compatible spreadsheet format [*.wk1 file],
- c. Though not stated in Tech Rules, a .DBF (FoxPro, Dbase) file format is acceptable.

The Electronic Data Interchange Handbook and a copy of the current HAZSITE application software may be obtained from the Department by calling (609) 633-1476. A diskette shall be submitted directly to your assigned case manager. Additional information regarding the HAZSITE application may be obtained through the Department's Internet web site at <http://www.state.nj.us/dep/srp>. Enter into the Regulations & Guidance icon to find the HAZSITE icon. Reports submitted without the required electronic data will not receive a final written approval from the Department.

All submittals must have three separate files. The files **must** be named as follow:

- a. DTST
- b. HZSAMPLE
- c. HZRESULT

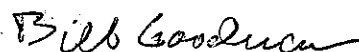
The Department has received many diskettes and the most common error has been the naming of the files. The files must be named **exactly** as referenced above with the required mandatory fields. The **file name** shouldn't reference the case name, SRP ID or any other identifier.

If remediation of soil and/or ground water has been completed, Detrex Corporation is required to submit the total capital costs involved in performing and confirming a cleanup as well as the costs associated with the proper disposal of all wastes generated during the cleanup. Costs to be reported include monitoring systems, equipment and mobilization costs; operational and maintenance costs, including all labor, utilities and repairs; consulting and labor costs, and sample costs; all disposal costs, including transport, waste transfer and facility tipping fees as well as regulatory review fees.

Be advised, soil remedial activities that will take longer than 5 years, and remedial actions involving groundwater and/or surface water require Department approval prior to implementation.

Finally, ISRA imposes as a precondition of a sale of business, assets or property, that the owner or operator must first obtain a No Further Action approval, a Remedial Action Work Plan approval, or a Remediation Agreement.

Should you have any questions regarding this correspondence, please contact me at (609) 292-6296.



Bill Goodman, Case Manager
Bureau of Risk Management, Initial Notice
and Case Assignment

c: Robert M. Currie, Detrex Corp
Ed Morgan, Whitesell Construction Company, Inc