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January 19, 2012

Ms. Tanya Mitchell
USEPA Region II
290 Broadway -19th Floor
New York, NY 10007-1866

VIA Email and U.S. MAIL

***RE: GEMS Phase II Project
Quarterly Progress Report – Fourth Quarter 2011***

Dear Ms. Mitchell:

On behalf of the GEMS Phase II Trust and pursuant to Paragraph XI Reporting Requirements of the Consent Decree, enclosed please find three (3) copies of the Quarterly Progress Report for the referenced site. This report discusses progress for the fourth quarter of 2011, covering the months of October, November, and December.

If there are any questions, please contact me at (908) 735-9315.

Very truly yours,

de maximis, inc.

William J. Lee
Project Coordinator

cc: Chief, Environmental Enforcement Section, Environment and Natural Resources
Division, United States Department of Justice
Chief, New Jersey Superfund Branch, Office of Regional Counsel, United States
Environmental Protection Agency
Section Chief, Hazardous Site Litigation Branch, Division of Law, Department of
Law and Public Safety, (3 copies)
GEMS Phase II Trustees
Steve Wohleb, New Jersey Department of Environmental Protection
Dave Mayer, Mayor, Township of Gloucester

GEMS (3120)/Quarterly Progress Reports/GEMS Progress Report 4th Qtr 2011/20120119

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**GEMS PHASE II PROJECT
CONSENT DECREE
QUARTERLY PROGRESS REPORT
October 1 through December 31, 2011**

1. ACTIONS TAKEN TOWARD ACHIEVING COMPLIANCE:

- Prepared for submission Third Quarter 2011 Progress Report on October 5, 2011.
- The groundwater extraction and treatment systems operated on a continuous basis, except for periodic shutdowns, which are reported to EPA as they occur. During this reporting period there was a cessation of operations of approximately 18 ½ hours starting on October 24th and extending to October 25th. This was prompted by a discharge sampling result initially reported as exceeding the discharge limit, but was subsequently reported by the laboratory to be incorrectly reported. There was a similar cessation of operations starting on December 23rd extending to December 24th for approximately 18 hours also due to a laboratory test result reported to exceed the discharge limit. Further analysis is underway to fully resolve the latter matter, but re-analysis of the original sample showed the result to be well below the discharge limit.
- Industrial Discharge Monitoring Reports (IDMRs) were submitted to the CCMUA on October 25, November 23, and December 23, 2011. There were no exceedances of any discharge parameters reported in these periods. The IDMRs are available for viewing at <http://www.gemssuperfundsite.org>, along with copies of progress reports submitted to EPA.
- The enclosed flare which operates to control emissions of landfill gas was replaced with a smaller unit more suitable to current levels of landfill gas production, pursuant to a permit-equivalent issued by the NJDEP. The new flare commenced operations during the week of December 5, 2011.
- Routine operation and maintenance of the Phase I facilities continues to be performed in accordance with the Phase I O&M Plan.
- The Quarterly Swamp Pink Monitoring Report was submitted on October 31, 2011.
- Swamp Pink Monitoring continues to be performed in accordance with the Swamp Pink Monitoring Plan.

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2. SUMMARY OF SAMPLING AND TEST RESULTS:

- There were no exceedances of the Discharge Permit parameters during the reporting period.

3. COMPLETED DELIVERABLES:

- Quarterly Swamp Pink Monitoring Report

4. ACTIONS PLANNED PRIOR TO SUBMITTAL OF NEXT TWO REPORTS:

- First Quarter 2012 Progress Report – April 2012
- Continue operation and maintenance of the Groundwater Extraction and Treatment Systems.
- Continue Swamp Pink Monitoring and Reporting.
- Continue Groundwater Performance Monitoring.
- Continue operation and maintenance of the Phase I facilities. Conduct stack test of new enclosed flare upon approval of the testing protocol submitted to NJDEP in August 2011.
- Conduct Downgradient Investigation following EPA approval to Work Plan

5. PERCENTAGE COMPLETION:

- a. Groundwater Extraction and Treatment System
 - X Initial Design and Construction - 100%
 - X Design Modification - 100%
 - X Remedial Action Work Plan - 100%
- b. Construction - 100%
- c. Treatment Plant Upgrade
 - a. Design - 100%
 - b. Construction - 100%
- d. Operation and Maintenance Phase
 - a. Inspection Date July 28, 2005
 - b. 64% complete
 - c. Final date of GEMS Trust – July 27, 2015

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6. DELAYS ENCOUNTERED OR ANTICIPATED:

- None

7. SUPPORT OF COMMUNITY RELATIONS PLAN:

- Files containing Monthly Progress Reports and IDMRs have been posted at the following website: <http://www.gemssuperfundsite.org>