



November 23, 2022

Ms. Melissa Dulinski
New Jersey Economic Development Authority
36 West State Street
Trenton, New Jersey 08608

Via email: MDulinski@njeda.com

**Re: Data Gap Summary
Federal Street Sites
Former Incinerator/Transfer Station Site
1401 Federal St., Camden NJ
Block 116, Lot 15**

Dear Ms. Dulinski,

BRS is pleased to provide the New Jersey Economic Development Authority (NJEDA) with this data gap summary of outstanding environmental issues at the above referenced property (the “site”). A review of prior environmental assessments was completed in order to provide recommendations for future assessment scope of work activities. BRS performed this desktop review using United States Environmental Protection Agency (US EPA) files, New Jersey Department of Environmental Protection (NJDEP) case files, and other available documentation for the Former Incinerator/Transfer Station Site.

The site is located near the Marlton neighborhood in Camden, NJ totaling approximately 1.53 acres in size (see attached **Figures 1 and 2**). The property is bounded to the north by railroad tracks, to the east by the Cooper River, to the south by Federal Street, and to the west by Admiral. The surrounding area includes residential and industrial uses.

Site Description and Background

The City of Camden is listed as site owner as of 1988. The site is not currently an active case with the New Jersey Department of Environmental Protection (NJDEP) but is listed under Program Interest (PI) No. G000008948 (Camden Transfer Station) with Case #s AA 9203108 (CMS-33), AA 9303100 (AA#67; CMS-03), and 91-4-12-1130-16. According to NJDEP case files no Licensed Site Remediation Professional (LSRP) has been retained on this site.

Historical aerial photographs and topographic maps for the general property vicinity were provided by the Camden Redevelopment Agency (CRA). Historic maps from years 1894, 1898, 1901, 1943, 1949, 1954, 1967, 1973, 1984 and 1995 all show a railroad spur on the northwestern portion of the property. The 1949- 1984 maps show six former structures, one nearest the railroad spur, four centrally located and one nearest the Cooper River on the east side of the property. Historic aerial photographs from years 1940, 1954, 1965, and 1970 show the railroad spur, a smokestack connected to the building nearest the Cooper

River and six or seven buildings scattered across the site. The structures look to be demolished in the 1986 and 1995 aerials.

NJDEP files requested through an Open Public Records Act (OPRA) request included two spill reports. The following information was provided in these reports.

- On 10/3/1988, NJDEP inspected the transfer station site and observed a discharge of oil from land to the Cooper River. A follow up inspection on 11/30/1988 observed that the release was still ongoing. A Notice of Violation was issued to the City on 11/30/1988 by NJDEP. A follow up inspection was again completed 6/2/1989 and soil samples were collected in banks along the river, at the “waste oil recycling center ” and water samples were collected from the river. The soil sample collected from the waste oil recycling center reported results of petroleum hydrocarbon at 168,699 parts per million (ppm). Other sample locations were listed as “trash and dirt berm”, “automobile heap”, and “tire and salt pile.” All locations were listed with elevated results of petroleum hydrocarbons. Another Notice of Violation was issued to the City at this time.
- An on-going release of suspected heating oil (No.2 fuel oil) was reported on 4/12/1991 by a Camden County Health Officer. The responsible part is listed as the City of Camden, Public Works. The release status is listed as buried contaminated soil, with investigation for cause in progress.
- A NJDEP Case Transfer Report dated 2/4/1992 from the Southern Enforcement Division lists the property with site name Camden City Transfer Station located at Federal Street and Cooper River. The environmental concern is listed as a discharge. A file within this record notes that groundwater may be contaminated with leachate from the waste pile. The recommended next steps indicate a consent order was issued to the City requiring installation of groundwater monitoring wells. The record notes that the waste pile at the transfer station was not contained on the concrete pad. A NJDEP site tracking form dated 9/13/1991 notes that groundwater, surface water and soils are impacted by site-wide contamination of leachate run off at the trash receiving pad and has seeped into groundwater and entered surface water (EPA Id # NJL000033191). It notes that a Stipulation of Settlement Agreement requires trash to be contained on the concrete pad and groundwater wells to be installed.
- NJDEP letter to the City of Camden dated 1/8/1993 lists the site with a Notice of Violation date of 5/1/1991 and Violation # 91-04-12-1130; 90-10-02-1229; 04-08-109. Notable soil exceedances listed in this letter include lead at 150 ppm, chrysene at 2 ppm, and benzo(a) anthracene at 1.7 ppm in soil sample location BH-3. Two sketches provided with this letter dated 7/2/1991 depict the transfer station site with a smoke stack near the Cooper River (near BH-3 sample location), a small brick building with tanks near Federal Street.
- An internal NJDEP memo dated 3/12/1993 notes there is no MOA and the City is listed as a recalcitrant responsible party. The description of the site notes it covers 4 acres of barren soil currently used as a transfer station and includes two unoccupied buildings and a large mound of road salt. City officials and Hargrove Construction were investigated for waste dumping crimes (no dates or judgments are listed). One area under the Federal Street overpass is noted as heavily contaminated by petroleum substances and that the whole site has varying levels of polycyclic aromatic hydrocarbon (PAH) impacts from the former City use of the site as an incinerator. The memo notes that the Federal Street overpass Area of Concern should at least be investigated due to the threat of impact to groundwater. The City apparently did not respond to the NJDEP effort to obtain an MOA.



- Another NJDEP Case Transfer Report dated 3/21/1993 lists the property with site name Camden City Transfer Station located at Federal Street. The environmental concern is listed as a seepage pit. The note reads “MOA declined.” A file within this record is listed with Violation number 4-8-109 and notes that groundwater may be impacted from soil. The record notes that surface water could be impacted by an area sampled by NJDEP, labeled as BH-3 and referenced in a 1/8/1993 letter, where surface water discharges were noted of an unknown drummed liquid with a total petroleum hydrocarbon result of 3,000 ppm. The recommended next steps indicate more soil sampling is necessary.
- The tax parcel record notes “demolished 2017”; it is assumed this reference is related to the former structures noted on the site as detailed above.

US EPA does not have any files for this property.

The following files were reviewed for this site have been uploaded to the web link, <https://spaces.hightail.com/space/0HxMnoiU1X>:

1. Communications Center Notification Report, 1991
2. Case Transfer Report, 1992
3. Case Transfer Report, 1993
4. Administrative Order and Notice of Civil Administrative Penalty Assessment
5. EDR Aerial Photo Decade Package, 2007
6. EDR Historical Topographic Map Report, 2007

Recommendations and Next Steps

In order to advance the investigation of the site, the recommended future scope of work includes the completion of a Preliminary Assessment (PA) and Site Investigation (SI) for the subject site. The work should be performed in accordance with the requirements of N.J.A.C. 7:26E, and be directed by a New Jersey Licensed Site Remediation Professional (LSRP). A geophysical survey should be completed as part of the PA to evaluate the potential for buried tanks, piping, and other subsurface structures. Site clearing will be necessary to accommodate the geophysical equipment.

Based on the prior reporting it is recommended the SI include test pitting of suspect areas of subsurface anomalies, installation of approximately 25 soil borings, five temporary groundwater monitoring wells, and collection of soil and groundwater samples for laboratory analysis.

It is estimated that six days of labor consisting of two days of test pitting, three days of drilling and one day of groundwater sampling will be required to install the test pits, soil borings, and temporary wells. It is recommended that up to two soil samples be collected per boring and test pit, and one groundwater sample be collected from temporary wells. Pending results of the initial groundwater sampling event, up to five permanent groundwater monitoring wells would be installed for two subsequent groundwater sample collection and analysis events.

Soil sample analysis would include the following analyses:

- Total Contaminant List (TCL)/ Target Analyte List (TAL) + 30 parameters
- Volatile Organic Compounds (VOCs)

- Category 1 Extractable Petroleum Hydrocarbons (Cat 1 EPH) analysis
- Category 2 EPH analysis
- Polychlorinated Biphenyls (PCBs)
- TAL metals analysis
- Polycyclic Aromatic Hydrocarbons (PAHs)
- EPH Contingency Analysis
- Pesticides/Herbicides

Groundwater sample analysis would include the following analyses:

- VOCs
- PCBs
- PAHs

The SI approach and sampling analysis will ultimately be determined by the LSRP of record for the site. Following completion of the SI activities, additional investigation may be required.

COST ESTIMATE

The detailed cost sheet is included as an attachment to this memo.

Activity	Cost Basis
Task 1 Preliminary Assessment and Geophysical Investigation	\$16,460.00
Task 2 Site Investigation	\$135,527.50
Estimated Total	\$151,987.50

This project has been funded wholly or in part by the United States Environmental Protection Agency under assistance agreement BF-96242421 to the New Jersey Economic Development Authority. The contents of this document do not necessarily reflect the views and policies of the Environmental Protection Agency, no names or recommend the use of commercial products mentioned in this document.

If you have any questions, please do not hesitate to contact me (856) 964-6456 or via email at aflammia@BRSinc.com.

Sincerely,



Alicia Flammia
Brownfield Redevelopment Solutions, Inc.

Cc: Olivette Simpson, CRA
Michele Christina, BRS
Jennifer Taylor, BRS
Megan Stanley, BRS

Figures



Notes:

1) Aerial sourced from Google Earth Pro (8/23/2022)
2) Parcels Included: Block 116, Lot 15; Bock 1181 Lot 1;
Block 1182, Lots 5 & 21; Block 1186, Lot 25
3) NJEDA - New Jersey Economic Development Authority

Legend
 Federal Street Parcels

Scale 1:3,000	0 125 250 500 Feet	
Figure Title	Federal Street Sites	
Client	NJEDA	
Address	Federal Street Camden, New Jersey	
Figure No.		1
Print Date		10/31/2022



Notes:	
1) Aerial sourced from Google Earth Pro (8/23/2022)	
2) Parcels Included: Block 116, Lot 15; Block 1181 Lot 1; Block 1182, Lots 5 & 21; Block 1186, Lot 25	
3) NJEDA - New Jersey Economic Development Authority	
Legend	
	Former Incinerator Site
	Federal Street Parcels

Scale 1:3,000		
Figure Title	Former Incinerator Site	
Client	NJEDA	
Address	Federal Street Block 116 Lot 15 Camden, New Jersey	
Figure No.	2	
Print Date	10/31/2022	

Cost Estimate

Incinerator/ Transfer Station Site, 1401 Federal St., Camden, NJ					
Activity	Quantity	Hours	Days	Unit Price	Total
ASSESSMENT COSTS					
Task 1 - LSRP Retention and Oversight, NJDEP forms, Geophysical Investigation and PA Report Submittal					
Principal		2		\$160.00	\$320.00
LSRP		12		\$150.00	\$1,800.00
Project Manager		8		\$130.00	\$1,040.00
Staff Geologist		30		\$110.00	\$3,300.00
Site Clearing to prepare site for surveys	1			\$6,500.00	\$6,500.00
Geophysics	1			\$3,500.00	\$3,500.00
				Task Total 1	\$16,460.00
Task 2a- Site Investigation Planning / Coordination					
LSRP		1		\$150.00	\$150.00
Project Manager/Staff		12		\$130.00	\$1,560.00
QAPP	1			\$3,000.00	\$3,000.00
HASP	1			\$1,850.00	\$1,850.00
				Subtotal Task 2a	\$6,560.00
Task 2b- Soil Investigation					
LSRP		8		\$150.00	\$1,200.00
Project Manager		12		\$130.00	\$1,560.00
Staff Geologist		72		\$110.00	\$7,920.00
Travel and Equipment	6			\$450.00	\$2,700.00
Geoprobe 25 soil borings			3	\$2,800.00	\$8,400.00
Macrocore liners		75		\$11.50	\$862.50
Temporary Well (25 ft)	5			\$200.00	\$1,000.00
Test Pitting Equipment			2	\$2,200.00	\$4,400.00
Mobilization to/from site	2			\$550.00	\$1,100.00
Laboratory Analysis					
Soil - TCL/TAL + 30 parameters	30			\$550.00	\$16,500.00
Soil - VOCs	22			\$120.00	\$2,640.00
Soil - EPH Category 1 analysis	22			\$120.00	\$2,640.00
Soil - EPH Category 2 analysis	22			\$155.00	\$3,410.00
Soil - PCBs	22			\$120.00	\$2,640.00
Soil - TAL	22			\$130.00	\$2,860.00
Soil - PAH	22			\$180.00	\$3,960.00
Soil - Pesticides/Herbicides	22			\$120.00	\$2,640.00
EPH Contingency Analysis	11			\$55.00	\$605.00
GW - VOCs	6			\$120.00	\$720.00
GW - PAHs	6			\$180.00	\$1,080.00
GW - PCBs	6			\$120.00	\$720.00
Dispose of IDW (up to 10 drums)	Est	1		\$6,000.00	\$6,000.00
				Subtotal Task 2b	\$75,557.50
Task 2c- Groundwater Investigation					
LSRP		8		\$150.00	\$1,200.00
Project Manager		10		\$130.00	\$1,300.00
Staff Geologist		16		\$110.00	\$1,760.00
Field Staff		50		\$100.00	\$5,000.00
Travel and Equipment	6			\$750.00	\$4,500.00
Well Installation - Shallow	5			\$2,000.00	\$10,000.00
Survey	1			\$2,800.00	\$2,800.00
Laboratory Analysis					
GW - VOCs	12			\$120.00	\$1,440.00
Dispose of IDW (up to 6 drums)	Est	1		\$3,000.00	\$3,000.00
				Subtotal Task 2c	\$31,000.00
Task 2d- Data Management and Evaluation					
Principal		1		\$160.00	\$160.00
LSRP		8		\$150.00	\$1,200.00
Project Manager/Staff		25		\$130.00	\$3,250.00
Data validation/DKQ review	1			\$3,000.00	\$3,000.00
				Subtotal Task 2d	\$7,610.00
Task 2e- LSRP Forms, EDDs, & SI Report					
LSRP		16		\$150.00	\$2,400.00
Project Manager/Staff		40		\$130.00	\$5,200.00
CADD Designer		16		\$100.00	\$1,600.00
Printing/shipping	1			\$200.00	\$200.00
Case Inventory Document	1			\$1,800.00	\$1,800.00
Receptor Evaluation (Initial)	1			\$1,800.00	\$1,800.00
Receptor Evaluation (Update)	1			\$1,800.00	\$1,800.00
				Subtotal Task 2e	\$14,800.00
				Task Total 2	\$135,527.50
Total SI Costs					\$151,987.50