Camden Redevelopment Agency

April 17, 2026

US Environmental Protection Agency, Region II
290 Broadway
New York, NY 10007-1866

Attn: Mr. Patrick Peck, Project Officer

RE: **RLF EPA Cooperative Agreement – BF 96250920 and RLF 4B96236900**
Brownfields Cleanup Decision Memorandum
1625 Federal Street
Block 1184, Lot 5
City of Camden, Camden County, New Jersey

Dear Mr. Peck:

The Camden Redevelopment Agency (CRA) is pleased to submit this Brownfields Cleanup Decision Memorandum (Decision Memo) to the U.S. Environmental Protection Agency (USEPA), in accordance with the referenced Cooperative Agreement.

This memorandum presents the steps leading to the selection of a remedial approach at the referenced site. The memorandum is organized as follows:

Section 1 – an introduction,

Section 2 - a summary of the Analysis of Brownfields Cleanup Alternatives (ABCA),

Section 3 – a description of the selected remedial approach, and

Section 4 – a demonstration that the selected remedial approach achieves regulatory compliance and attains the cleanup goals.

1 INTRODUCTION

1.1 Background

The Site is comprised of Block 1184, Lot 5, and is located at 1625 Federal Street in the City of Camden, Camden County, New Jersey (Site). The Site encompasses an areal extent of 2.9 acres and is currently unoccupied. The Site consists of a concrete pad and raised concrete slabs associated with former buildings.

The U.S. Environmental Protection Agency (USEPA) has awarded the City of Camden a $500,000 Cleanup grant (2020) and the Camden Redevelopment Agency a 2022 RLF grant totaling $3.5 million, of which $1.5 million loan has been allocated to the site to support environmental remediation activities. The CRA has entered into agreements with the USEPA (USEPA Cooperative Agreement No.s BF 96250920 and 4B96236900) which provides the terms and conditions for use of the brownfields cleanup grant funds, including a commitment to provide for community involvement in the site remediation process.

In accordance with those terms and conditions, the City of Camden Redevelopment Agency (CRA) on behalf of the City produced a work plan describing cleanup tasks to be completed, including project deliverables. Project deliverables include the ABCA and this Decision Memo, among other documents. The CRA produced the draft ABCA, dated November 2019, and the final on April 2026 and submitted the document to the USEPA. A summary of the ABCA is presented below, in Section 2.

Based on the analyses provided in the ABCA, including the open public meeting held in July 2025; consultation with the State regulatory authority (NJDEP) and the Licensed Site Remediation Professional (LSRP) charged with overseeing cleanup activities at the site; and the entirety of the administrative record for the site, the City has selected a remedial approach for the site, as presented in this Decision Memo.

2 SUMMARY OF ABCA

The purpose of the ABCA is to identify, evaluate, and compare the reasonable alternatives for addressing the contamination identified at the Site. The ABCA presents information regarding site description, site environmental conditions, applicable laws and standards, and an evaluation of selected remedial alternatives. These items are summarized in this section.

2.1 Site Description

Initially the Site at 1625 Federal Street manufactured steam heating supplies. More recently, the Site produced printing inks and wire racks. The Site has been vacant since the early 1990s. The City of Camden acquired the Site in 1999 through foreclosure and is attempting to remediate this Site for redevelopment.

The Site formerly contained a multi-story abandoned industrial building, a portion of which was destroyed by fire in the late 1990s which was later demolished. The remaining portions of the buildings were also damaged by fire and scrap metal scavenging.

Railroad tracks associated with NJ Transit's Light Rail border the northern portion of the Site. An abandoned industrial building and residential properties are located to the west, and a vacant lot is present to the east. To the south is Federal Street, across which lies additional vacant lots.

2.2 Site Environmental Conditions

Many environmental assessment and investigation activities have been undertaken at the Site and surrounding area since 1981. Additional limited, targeted investigation activities will be conducted prior to implementing the remediation in order to refine the extent of contamination.

The Site is located between 10 and 20 feet above sea level within a mapped outcrop of the Potomac Formation (Kp), which is composed of fine- to coarse-grained sand, interbedded with white, red, or yellow clay. The underlying bedrock aquifer is the Potomac-Raritan-Magothy (PRM) aquifer system. Groundwater is found at approximately seven feet bgs and flows in an east-southeast direction.

Following completion of a Preliminary Assessment (PA) and Site Investigation (SI), contamination was confirmed at the AOCs listed under section 2.2.2. Both soil and groundwater have been impacted by former use. The most recent Remedial Investigation Report / Remedial Action Workplan (RIR/RAW) (Environmental Resolutions, Inc., November 2011; BL Companies Amendment, January 2025) identified 22 Areas of Concern (AOCs) at the Site.

2.2.1 Preliminary Assessment

A Preliminary Assessment Report was completed for the Site by Remington & Vernick Engineers, Inc. (Remington & Vernick) on June 4, 2001, which identified twenty-three (23) AOCs. Remington & Vernick and JM Sorge, Inc. (JMS) conducted Site Investigations (SI) from 2002 to 2009, and No Furter Action (NFA) proposals for eleven (11) AOCs were included in an NJDEP-approved Site Investigation Report (SIR). No further investigation was proposed by ERI based on the findings of the Remedial Investigation portions of the 2011/2012 RIR/RAW for seven (7) of the remaining twelve (12) AOCs. Remedial Action was proposed by ERI for five (5) areas of concern.

2.2.2 Site Investigation (SI)

A Remedial Investigation Report and Remedial Action Workplan (RIR/RAW) as well as a Remedial Action Workplan Addendum, prepared by ERI and as amended by BL Companies, summarizing historic investigations, sampling, and analysis of the contaminated soils at the Site was completed. Historical analytical results have identified concentrations of several contaminants in the soil samples collected at the Site in exceedance of their applicable migration to groundwater soil remediation standards. The analytical results of the site investigation and remedial investigation samples including field screening and groundwater sampling identified areas of concern associated with volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs) in soil and groundwater. Chlorinated VOCs, including trichloroethene (TCE) were consistently detected above Migration to Groundwater Soil Screening Levels in soil and above GWQS in groundwater, indicating impacts to the groundwater pathway and the presence of ongoing source material in several areas. Additional contaminants such as PAHs, pesticides, and metals were also detected above applicable soil criteria.

The analytical results of the site investigation and remedial investigation, including field observations and laboratory analysis, confirmed the presence of site-wide historic fill across the property. The historic fill was determined not to be impacting groundwater; however, contaminants associated with the fill require institutional controls, such as a deed notice and cap.

2.2.3 Ongoing Monitoring

Remediation is anticipated to include an Engineering Control or recording of a deed notice for soil and virtual groundwater classification exemption area (CEA) as Institutional Controls will be conducted.

2.2.4 Summary of Data

All work has been and will continue to be overseen by the LSRP of record for the site. This approach will allow for eventual restricted use of the site using NJDEP Presumptive and Alternative Remedy Technical Guidance for the hot spot removals and an engineering control (cap). The cap will be routinely inspected, and vegetation will continue to be monitored.

2.3 Applicable Laws and Cleanup Standards

All Site remediation to be performed under this grant would be conducted in accordance with the New Jersey Site Remediation Reform Act, N.J.S.A. 58:10C-1 et seq.; the Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-12 and implementing regulations in the Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C; and the Technical Requirements for Site Remediation, N.J.A.C. 7:26E. The most current versions of the NJDEP Technical Guidance documents will be referenced, including:

- *Historic Fill Guidance Document,*
- *Capping of Sites Undergoing Remediation,*
- *Presumptive and Alternate Remedy Guidance Technical Guidance Document,* and
- various other NJDEP guidance documents applicable to the project.

The reference remediation standards for soil will be NJDEP's published numeric values for Non-Residential Direct Contact Soil Remediation Standards (NRDCSRS), NJDEP's Residential Direct Contact Soil Remediation Standards (RDCSRS), and default Impact to Groundwater Soil Screening Levels (IGWSSLs).

The reference remediation standards for groundwater will be the current version of Class II-A Specific Groundwater Quality Criteria (GWQC) published in *Groundwater Quality Standards* (N.J.A.C 7:9C).

The effective implementation of the applicable laws and guidance will be managed and overseen by a Licensed Site Remediation Professional (LSRP), to be retained for the Site by the City. Any Response Action Outcome (RAO, i.e., NFA-equivalent) for the Site will be issued by the LSRP. Project reports, RAOs, etc. will be submitted on behalf of the City to the NJDEP, which retains the authority to audit the project and/or review and potentially reject any documents submitted.

2.4 Analysis of Cleanup Alternatives

The ABCA presents an evaluation of several potential cleanup scenarios for the site. The following evaluation criteria were considered in comparing the remedial alternatives:

- Effectiveness in providing compliance with NJDEP regulations and increased protectiveness to public health and the environment;
- Implementability of the considered alternative;
- Cost of the considered alternative; and

- Sustainability and resilience considerations.

Based on these criteria and giving consideration to site characteristics, surrounding environment, land-use restrictions, potential future uses, and cleanup goals, the City selected "Removal of Soil and Enactment of Engineering and Institutional Controls" as the preferred remedial approach. The preferred remedial approach is described in Section 3 of this Decision Memo.

Subsequent to the publication of a Draft ABCA, the City solicited and received public comment (as documented in the Final ABCA). A summary of the public comments received is appended to the Final ABCA document. No public comments expressed objection to, or disagreement with, the preferred remedial action.

3 SELECTED ENVIRONMENTAL CLEANUP PLAN

3.1 Remedial Approach: Removal of Soil and Enactment of Engineering and Institutional Controls

The remedial action will include removal of contaminated soil hot-spots, followed by installation of permeable and impermeable caps as Engineering Controls, and recording of a deed notice and a classification exemption area (CEA) as Institutional Controls. This combination of remedies will prevent exposure to residual Site contaminants. Further details of the remediation plan would include:

- Excavation and disposal of approximately 5,800 tons of impacted soil.
- Post-excavation sampling to document compliance with remediation standards.
- Backfill with a combination of clean stone and certified clean fill
- Demolition and disposal of raised concrete areas (700 tons) within the excavation areas.
- Monitoring well abandonment (2) within the excavation areas.
- Following characterization of soil waste, transportation and disposal of soils at a licensed/permitted disposal facility.
- Installation of clean soil (5,730 tons) capping of impacted areas.
- Concrete restoration (264 tons) to serve as a cap where needed, any suitable concrete cap to remain as is.
- All fill material will be compliant with the NJDEP Fill Material Guidance for SRP Sites, dated April 2015 (Version 3.0), and documentation of compliance will be provided in the final Remedial Action Report. Ultimately, the final remedial action including the engineered cap will be completed upon development of the Site.
- The ongoing protectiveness of the engineering controls will be ensured by development of, and adherence to, an Operation and Maintenance Plan. Ongoing operation and maintenance of the cap will be performed.
- The Institutional Controls will consist of a deed notice attached to the deed in perpetuity. The deed notice will provide notice of the contaminants and the concentrations that were

left in place, and controlled by the Cap. In addition, a CEA will be established to prohibit groundwater use on the Site.

Selection of this alternative will result, upon completion, in restricted future use of the Site.

3.2 Selection Rationale

This approach complies with restricted-use remediation standards and achieves project remediation goals by:

- Achieving compliance with the NJDEP Rules.
- Significantly reducing the potential for human exposure to residual site soil contaminants.

4 Regulatory Compliance and Achievement of Cleanup Goals

4.1 Regulatory Framework

The site will be remediated per regulations as set forth in the Technical Requirements for Site Remediation (TRSR) N.J.A.C. 7:26E.

NJDEP's published numeric values for the Ingestion/Dermal Non-Residential exposure pathway (IDNR), Ingestion/Dermal Residential exposure pathway (IDR), Inhalation Residential exposure pathway (IHR), Inhalation Non-Residential exposure pathway (IHNR), and Migration to Ground Water exposure pathway (MGW) (NJAC 7:26D).

If groundwater contamination is to be addressed, the reference remediation standards for groundwater will be the current version of Class II-A Groundwater Quality Criteria (GWQC) published in Groundwater Quality Standards (N.J.A.C 7:9C).

The effective implementation of the applicable laws and guidance will be managed and overseen by the LSRP currently retained for the site. Any Response Action Outcome (RAO, i.e., NFA-equivalent) for the site will be issued by the LSRP. Project reports, RAOs, etc. will be submitted on behalf of the City to the NJDEP, which retains the authority to audit the project and/or review and potentially reject any documents submitted.

4.2 Achievement of Cleanup Goals

The goal of the project is to address contamination in order to facilitate redevelopment for light manufacturing / commercial reuse. Remediation will address contaminated soil hot spots and site-wide contaminated historic fill.

4.3 Limitations

Following remediation, limited contamination will still exist, though the cap and CEA will significantly reduce the potential for human exposure. Future site owners, occupants, and the general public will be provided notice of site environmental conditions by means of the Deed Notice.

5 Closing

This Decision Memo was prepared with the assistance of the City's technical consultant, Brownfield Redevelopment Solutions, Inc. (BRS). Please contact the BRS project managers listed below, or the undersigned, with any questions regarding this document.

BRS Project contacts:

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(856) 964-6456

Michele Christina, Principal
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(856) 964-6456

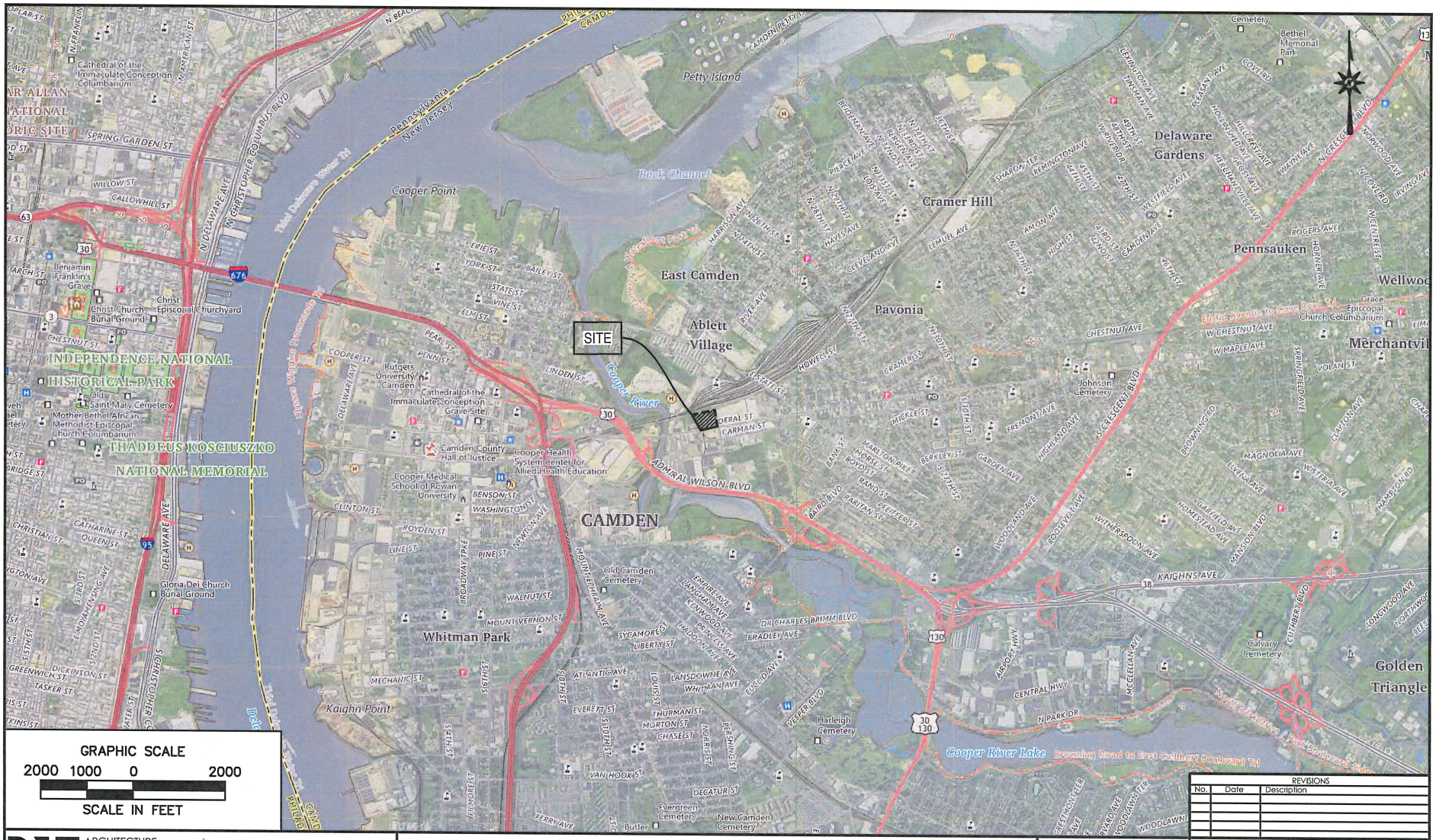
Sincerely,

Olivette Simpson,
Executive Director, Camden Redevelopment Agency

Attachment

cc: Michele Christina, BRS
Jennifer Taylor, BRS
Alison Devine, BRS

Attachment A – Site Location Map



REVISIONS		
No.	Date	Description

BL Companies
ARCHITECTURE
ENGINEERING
ENVIRONMENTAL
LAND SURVEYING

535 Route 38 East
Suite 250
Cherry Hill, NJ 08002
(856) 485-8400

FORMER BORDEN CHEMICAL SITE

CRA - FEDERAL STREET PROPERTIES
BLOCK 1184, LOT 5
CAMDEN, NEW JERSEY 08105

Designed	EKC
Drawn	EKC
Reviewed	JPM
Scale	1"=1000'
Project No.	2401228
Date	01/24/2025
Sheet	1 OF 1

XREF (s): : BD240122802