



November 15, 2023

US Environmental Protection Agency, Region II  
290 Broadway  
New York, NY 10007-1866  
Attn: Mr. Patrick Peck, Project Officer

Dear Mr. Peck:

**RE: RLF EPA Cooperative Agreement – BF 9628614-0  
Brownfields Cleanup Decision Memorandum  
Reliable Tire  
1115 Chestnut Street (Block 1302, Lot 1) Camden, New Jersey**

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**

Reliable Tire is located at 1115 Chestnut Street, comprising approximately 1.98 acres across Block 1302, Lots as described by the City of Camden for tax purposes. Reliable Tire is currently an unimproved lot covered with grass. The subject site formerly operated as the Camden Pottery Company, a pottery manufacturing operation, from approximately 1906 until 1964 and as Reliable Tire Company from 1964 until 1999.

The U.S. Environmental Protection Agency (USEPA) has awarded the City of Camden a \$118,525 EPA RLF Subgrant to assist with the environmental remediation of the site. The CRA has entered into an agreement with the USEPA (USEPA Cooperative Agreement No. BF 9628614-0) 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 January 15, 2023 and the final on July 5, 2023 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 August 2023; consultation with the State regulatory authority (NJDEP); 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**

The subject site formerly operated as the Camden Pottery Company, a pottery manufacturing operation, from approximately 1906 until 1964 and as Reliable Tire Company from 1964 until 1999. The site included vacant buildings from 1999 until 2011. A fire consumed the onsite buildings in June 2011, and the site has been vacant unimproved land since 2011.

### **2.2 Site Environmental Conditions**

The site is currently an active case with the New Jersey Department of Environmental Protection (NJDEP) Site Remediation Program (SRP) with Program Interest (PI) No. 021388 and has been subject to a Preliminary Assessment (PA) February 2021, which identified 10 AOCs with potential to adversely impact soil and groundwater at the site. A total of 9 of the AOCs required further investigation. A Site Investigation (SI) was completed in March 2023 to investigate the 9 AOCs. The results of studies are summarized in this section.

### **2.2.1 Preliminary Assessment**

TTI Environmental, Inc. (TTI) conducted a Preliminary Assessment (PA) dated February 4, 2021 for 1115 Chestnut Street (Block 1302, Lot 1) (site) located in Camden, Camden County, New Jersey. The site consists of approximately 1.98 acres and is currently an unimproved lot covered with grass. The site formerly operated as the Camden Pottery Company, a pottery manufacturing operation, from approximately 1906 until 1964 and as Reliable Tire Company from 1964 until 1999. The site included vacant buildings from 1999 until 2011.

### **2.2.2 Site Investigation (SI)**

TTI Environmental, Inc. identified a total of 10 AOCs in the PA and geophysical survey conducted by Delta Geophysics (Delta). A Site Investigation was recommended for all AOCs except AOC 5: Electrical Transformers and Capacitors.

Between 2021 and 2023, TTI conducted supplemental site investigations and remedial investigations. TTI recommended the removal of the three heating oil and two unknown USTs per NJDEP UST removal guidance for AOC 1. TTI recommended the hotspot remediation of soils impacted by AOCs 3 and 4. No further investigation or remediation was recommended for AOCs 2, 6, 7, 8, 9, and 10.

### **2.2.3 Ongoing Monitoring**

Remediation is not anticipated to include an Engineering Control or recording of a deed notice for soil. However, a virtual groundwater classification exemption area (CEA) as Institutional Controls will be conducted. No Operation and Maintenance is anticipated upon completion of remediation.

### **2.2.4 Summary of Data**

The Camden Redevelopment Agency has received EPA approval for the use of brownfield Revolving Loan Fund (RLF) monies to extend a subgrant to the City of Camden. All work has been and will continue to be overseen by the LSRP of record for the site. This approach will allow for eventual unrestricted use of the site using NJDEP Presumptive and Alternative Remedy Technical Guidance.

## **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:

- Soil SI/RI/RA
- Ground Water SI/RI/RA
- Presumptive and Alternative Remedy Technical Guidance

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 warranted upon completion of the additional assessment work, 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 a Licensed Site Remediation Professional (LSRP) to be 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.

#### **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; and
- Cost of the considered alternative.

Based on these criteria and giving consideration to site characteristics, surrounding environment, land-use restrictions, potential future uses, and cleanup goals, the City selected UST Removal with Hot Spot Remediation 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: UST and Hot Spot Soil Removal

Prior to reuse of the site, the City must remove the three heating oil and two unknown USTs per NJDEP UST removal guidance, including the update and/or registration of the USTs with NJDEP. HDSRF funding will be used for all further assessment and investigative work.

TTI is currently conducting a SI/RI of AOCs 3 and 4 (Historic Fill Material and Buried Debris). SI sampling of AOCs 3 and 4 identified benzo(a)pyrene and lead above the RDCSRS in TP-4 and TP-6 respectively. TTI conducted additional soil sampling to delineate benzo(a)pyrene contamination to a 10 foot wide by 10 foot long by 5 foot deep volume of soil. Additional soil sampling was conducted to delineate lead contamination to a 20 feet wide by 15 feet long by 5 foot deep volume of soil. Contaminated soils associated with AOCs 3 and 4 will be removed as part of hotspot remediation of soils via excavation.

Under this alternative, the remedial action will include registering the USTs for closure and removal of the USTs. HDSRF funds will be used to conduct the sampling under the tanks to assess impacts from USTs. EPA grant funds will be used for the UST removal, soil excavation, and emplacement of the cap to address historic fill at the site. Remediation is not anticipated to include an Engineering Control or recording of a deed notice for soil. However, a virtual groundwater classification exemption area (CEA) as Institutional Controls will be conducted.

This combination of remedies will prevent exposure to residual site contaminants. Further details of the remediation plan would include:

- The USTs shall be removed from the excavation following cleaning activities. The USTs shall be made unusable by cutting a hole through the metal top and hauled to a scrap facility for recycling. The tasks will also include sampling and analysis of tank base soils to complete site investigation activities and tank closure requirements.
- Groundwater encountered during tanks and soil removal will be pumped from the excavation cavity to an onsite holding tank for characterization analysis and disposal off-site.
- Excavated soils for disposal will be sampled and characterized in accordance with the requirements of the designated disposal facility. The tasks will also include the emplacement of clean backfill.
- Restore site with topsoil and seed.
- In addition, an indefinite duration groundwater Classification Exception Area (CEA) will be established to prohibit groundwater use on the site.

Selection of this alternative will result, upon completion of the remediation activities, in unrestricted future use of the site.

### **3.2 Selection Rationale**

This approach complies with unrestricted-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 under the oversight of the New Jersey Department of Environmental Protection (NJDEP), the state environmental authority, as 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 Licensed Site Remediation Professional (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.

The objective of the site remediation activities is to have an AOC specific RAO issued by the LSRP.

### **4.2 Achievement of Cleanup Goals**

It is expected that UST closure and hot spot soil removal at the site will result in the site meeting unrestricted use standards and allow for refurbishment of the property.

### **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

Sincerely,



Olivette Simpson,  
Interim Executive Director, Camden Redevelopment Agency

Attachment

C: Michele Christina, BRS  
Alicia Flammia, BRS  
Jennifer Taylor, BRS  
Alison Devine, BRS

**Attachment A – Site Location Map**



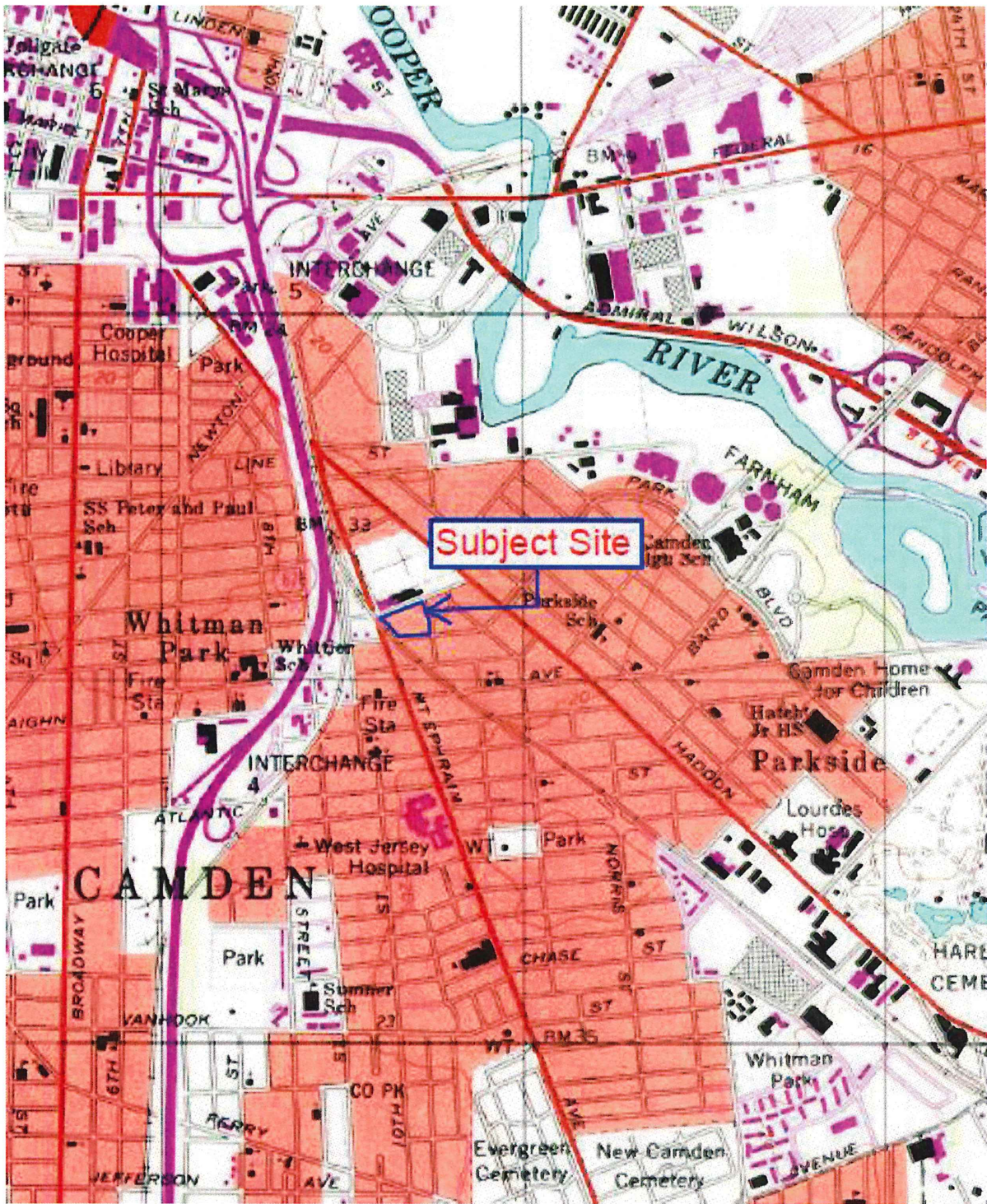
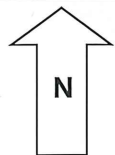


Figure 1.0:

Regional Site Location Map

Reliable Tire Co.  
 1115 Chestnut Street  
 Block 1302, Lot 1  
 Camden, Camden County,  
 New Jersey 08103



TTI Environmental, Inc.  
[www.ttienv.com](http://www.ttienv.com)

SCALE  
 1:7,500

DRAWN BY  
 USGS

DATE  
 1/2021

PROJECT  
 20-763

APP'D BY  
 AB

DRAWING NO.  
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