Analysis of Brownfields Cleanup Alternatives

Yaffa Dirt Pile Site, Block 331
616 Chestnut Street et al.
(Block 331, Multiple Lots)
Camden, New Jersey

Prepared by BRS, Inc. for the

Camden Redevelopment Agency
520 Market Street
City Hall
Camden, New Jersey

DRAFT

December 1, 2025

739 Stokes Road, Units A & B, Medford, NJ 08055 • PO Box 2293, Medford Lakes, NJ 08055
t (856) 964-6456 • f (732) 782-0404 • www.BRSinc.com

CONTENTS

ATTACHMENTS

1 EXECUTIVE SUMMARY

The work is to be performed at certain publicly owned lots located at 616 Chestnut Street et al. (Block 331, Lots 41, 46, 48, 49, 50, 52-65, 67, 75, 80, 86, 87, 113 and 114) in the City of Camden, New Jersey. The Site is currently vacant commercial property which is owned by the City of Camden.

The work is related to the Weyhill Reality Holdings I LLC (aka Yaffa Dirt Pile Site) site bound by Mount Vernon Street to the North, Seventh Street to the east, Sycamore Street to the south, and Sixth Street to the west. The work pertains to the entire Yaffa site, including twenty lots on Block 331 where the former Weyhill Reality Holdings I LLC operated.

Historical operations included a scrap metal yard, automotive repair, junk storage, junkyard, a greenhouse, a church, and a paper stock warehouse, as shown in Sanborn maps from 1891 through 1994. The Yaffa operations ceased when Yaffa & Sons, Inc. sold the property to Weyhill Realty Holdings, LLC and WRH 1, LLC (Weyhill) on July 19, 2019. Dumping activities encroached upon publicly owned properties and other privately owned properties across the neighborhood. The Site is surrounded by residential and commercial properties and roadways, including Chestnut Street, Sycamore Street, S 6th Street, and S 7th Street.

The site is currently an active case with the New Jersey Department of Environmental Protection (NJDEP) Site Remediation Program (SRP) with Program Interest # 025881 and Solid Waste Program Interest # U2318. The Licensed Site Remediation Professional (LSRP) of record is Christopher D. Valligny (LSRP # 629039). The remediation of the soil piles on the Yaffa site was completed in 2024. Additional soil hot spot excavation and excavation of fill across the site to a maximum depth of 4 feet below grade (fbg) will be required in order to achieve unrestricted reuse. Under the preferred alternative, the remedial action will include removal of site-wide impacted fill material and soil hot spots to an average depth of 2 fbg. The expected outcome is Unrestricted Use for soils and Limited Restricted Use for groundwater.

2 INTRODUCTION & BACKGROUND

The work is to be performed at certain publicly owned lots located at 616 Chestnut Street et al., in the City of Camden, New Jersey (Block 331, 26 lots). The work is related to the Weyhill Reality Holdings I LLC (aka Yaffa Dirt Pile Site) site bound by Mount Vernon Street to the North, Seventh Street to the east, Sycamore Street to the south, and Sixth Street to the west. The work pertains to the Yaffa site, including 26 lots on Block 331 (Block 331, Lots 41, 46, 48, 49, 50, 52-65, 67, 75, 80, 86, 87, 113 and 114).

The City of Camden Redevelopment Agency (CRA) has contracted Brownfield Redevelopment Solutions, Inc. (BRS), to prepare this Analysis of Brownfields Cleanup Alternatives (ABCA) in support of EPA grant funding. The purpose of the ABCA is to:

- Identify reasonable brownfields cleanup alternatives considered for addressing the contamination identified at the site;

- Analyze the various factors influencing the selection of a preferred cleanup method, including effectiveness, implementability, costs, and sustainability;
- Select the preferred cleanup method, based on the analyses performed; and
- Provide community outreach and solicit public participation and comment on the remedial selection process prior to the final decision.

The CRA on behalf of the City will promote and facilitate community involvement with the environmental cleanup and site redevelopment project with the activities itemized below.

- The CRA has performed targeted outreach to notify communities of the availability of this ABCA. To fulfill the Public Notification requirements of N.J.A.C. 7:26C-1.7, Montrose Environmental Solutions, Inc. (Montrose) posted public notification signs (English and Spanish) at the Site on October 3, 2022. The signs identify the environmental case and relevant contact information, and states that the environmental cleanup is in progress at the Site. In addition, the CRA has published a notice of availability of the draft ABCA on its website.
- The CRA has provided an opportunity for members of the public to comment on the ABCA in a public meeting held on 12/4/2025 and on 12/9/2025.
- The CRA has prepared written responses to the comments received and documented any changes made to the cleanup plans and to the ABCA as a result of the comments.

A Brownfields Cleanup Decision Memo will be prepared at the end of the public comment process, which will describe the cleanup options selected for the site. The ABCA and the Decision Memo will be included with the Administrative Record. The Administrative Record repository is available on the CRA website.

The expected outcome is Unrestricted Use for soils and Limited Restricted Use for groundwater.

2.1 Site Description and Previous Uses

The work is to be performed at certain publicly owned lots located at 616 Chestnut Street et al. (Block 331, Lots 41, 46, 48, 49, 50, 52-65, 67, 75, 80, 86, 87, 113 and 114) in the City of Camden, New Jersey. The Site is currently vacant, former commercial property which is owned by the City of Camden. A gravel cover was emplaced over the entire site after soil pile removal was completed in 2024 for dust suppression purposes.

The Site parcels have been occupied since at least 1891 and have included a mixture of residential and commercial uses. The “S Yaffa & Sons Inc” facility that initiated the environmental case and is the subject of this report dates back to at least 1927, based on a City Directory image that identified “Yaffe Sami Junk” as the occupant at 619 Chestnut Street. Historical operations included a scrap metal yard, automotive repair, junk storage, junkyard, a greenhouse, a church, and a paper stock warehouse, as shown in Sanborn maps from 1891 through 1994. The Yaffa operations ceased when Yaffa & Sons, Inc. sold the property to Weyhill Realty Holdings, LLC and WRH 1, LLC (Weyhill) on July 19, 2019.

The former owners have been evicted from the Site. Weyhill reportedly imported and illegally stockpiled soil and debris from construction and demolition jobs in Philadelphia without proper permits.

2.2 Surrounding Land Use

Yaffa dumping activities encroached upon publicly owned properties and other privately owned properties across the neighborhood. The Site is surrounded by residential rowhouses and commercial properties and roadways, including Chestnut Street, Sycamore Street, S 6th Street, and S 7th Street.

2.3 Project Goal (Reuse Plan)

All work will be overseen by the LSRP of record for the site.

The removal and off-site soil disposal of the soil piles on the Yaffa site was completed in 2024. Additional soil hot spot excavation and excavation of fill across the site to a maximum depth of 5 feet below grade will be required in order to achieve residential reuse.

2.4 Summary of 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 # 025881 and Solid Waste Program Interest # U2318. The Licensed Site Remediation Professional (LSRP) of record is Christopher D. Valligny (LSRP # 629039).

The CRA has conducted soil pile removal and assessment activities to ultimately facilitate receipt a Response Action Outcomes (RAO) for the site. Montrose Environmental Solutions, Inc. (Montrose) oversaw the soil pile removal in 2023 and 2024 and prepared a Preliminary Assessment (PA) Report dated August 14, 2024.

Montrose's PA Report identified 15 Areas of Concern (AOCs), and Montrose recommended a Site Investigation (SI) to address 9 of the 15 AOCs identified. The SI included 9 test pits, 4 soil borings, 18 soil samples, and the installation and sampling of 3 permanent monitoring wells (MW-1, MW-2, MW-3) as described in the November 12, 2024 SI Report. Montrose recommended additional sampling activities to complete the delineation of all contaminants of concern (COCs) in soil at the Site. The Remedial Investigation (RI) is on-going and includes 7 AOCs requiring investigation, as presented in the table below.

AOC ID	AOC Description
AOC-3	Loading/Unloading Areas for Trash and Construction Debris
AOC-4	Storage Pads, Including Drum and/or Waste Storage
AOC-6	Waste Piles, as defined by N.J.A.C. 7:26
	• AOC-6a: Pile B – Soil and Mixed / Unprocessed Materials
	• AOC-6b: Pile C – Unprocessed Concrete, Brick, Block
	• AOC-6c: Pile D – Mixture of Screened Soil and Crushed Construction Debris
	• AOC-6d: Solid Waste Beneath Pile B

AOC-7	Historical Fill
AOC-9	Spill Incident # 96-04-19-0840-37: Spills from trucks cranes, and containers
AOC-11	Former Railroad Spur
AOC-13	Former On-Site Operations
	• AOC-13a: Steam Fitting Shop – no further investigation required
	• AOC-13b: Greenhouse – no further investigation required
	• AOC-13c: Junk Storage Areas
	• AOC-13d: Automotive Repair
	• AOC-13e: Yaffa Paper Stock Warehouse – no further investigation required
	• AOC-13f: Yaffa Scrap Metal Operations
	• AOC-13g: Weyhill Soil/Debris Stockpiling Operations

In addition, Montrose is conducting further soil sampling in December 2025 to delineate PCB exceedances over 1 part per million (ppm) to meet Toxic Substances Control Act (TSCA) requirements / United States Environmental Protection Agency (USEPA) federal regulations.

The current list of COCs in soil above residential and/or non-residential Soil Remediation Standards at the Site is:

SVOCs	PCBs	PFAS	Metals
1,1-Biphenyl	Total PCBs	PFOS	Antimony
Benzo[a]anthracene		PFOA	Arsenic
Benzo[a]pyrene			Cobalt
Benzo[b]fluoranthene			Copper
Dibenz(a,h)anthracene			Lead
Indeno[1,2,3-cd]pyrene			Nickel
Naphthalene			
2-Methylnaphthalene			

Extremely high (hazardous) levels of Lead (up to 22,300 ppm), high levels of Arsenic (up to 57.7 ppm), and a maximum concentration of 17 ppm total PCBs are present in shallow soils between 1.5-2 fbg, but those concentrations vary across the Site. Most impacted soil is found between 1.5-2 fbg; however, three samples at 4.5-5 fbg (TP-3 SVOCs; TP-12 PCBs; GP-111 PFAS) and one sample at 8.5-9 fbg (GP-2 metals and PFOA) exhibit impacts above applicable standards.

There are no volatiles in soil (or groundwater at this time), so vapor intrusion is not a concern at this time. At this time, it is unknown if a groundwater investigation will be required for metals. The outcome of additional remedial assessment efforts will determine whether or not groundwater is contaminated above applicable standards. If so, groundwater may require remediation via an indefinite duration groundwater Classification Exception Area (CEA) to prohibit groundwater use on the site. An Institutional Control such as a CEA could require years of groundwater monitoring and permit fees.

2.5 Physical Setting

The site is flat. The elevation at the property is approximately 15 feet above mean sea level, according to the United States Geological Survey (USGS) 2014 Camden, NJ 7.5 Minute topographic quadrangle map. Soils at the subject site are identified as urban land.

The site is located within the Coastal Plain physiographic province of New Jersey. The dominant formation in this province is the Potomac Formation, which consists of fine to coarse grained sand, interbedded with white, red or yellow clay. According to NJ-GeoWeb, surficial geology consists of salt-marsh and estuarine deposits, as well as Cape May formation. Surficial geology generally consists of sand, silt, peat clay cobble gravel and pebble gravel. These deposits are generally from the late Pleistocene to Holocene eras.

NJ-GeoWeb identifies the subject property as underlain by the Potomac-Raritan-Magothy aquifer system. No surface water bodies are present on or adjacent to the Site. The closest water body is the Delaware River, which is located approximately 4,750 feet to the south of the site.

2.6 Exposure Pathways

In order for contaminants from a site to pose a human health or environmental risk, one or more completed exposure pathways must link the contaminant to a receptor (human or ecological). A completed exposure pathway consists of four elements:

- A source and mechanism of substance release;
- A transport medium;
- A point of potential human or ecological contact with the substance ("exposure point"); and
- An "exposure route", such as dermal contact, ingestion, etc.

Site evaluation indicates the following potentially completed exposure pathways related to the site in its current condition (i.e., pre-remediation):

- **Direct contact with Soil**. Soil might be handled by children, nearby residents, occasional on-site construction workers or trespassers. This exposure pathway has been mitigated by implementation of the former soil pile removals and concrete barrier placement. The proposed cleanup activities, which includes hot spot soil and historic fill material excavation and offsite disposal will remove all source material, thereby removing the hazard.

- **Direct contact with surface water**. There is no surface water at the Site.
- **Direct Contact with, or Ingestion of, Groundwater.** There are no current or anticipated future uses of onsite groundwater.
- **Vapor intrusion risk**. Based on the absence of VOCs, a vapor intrusion risk is not likely.

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:

- *Preliminary Assessment Technical Guidance*
- *Soil SI/RI/RA*
- *Ground Water SI/RI/RA*

Applicable remediation standards are the NJDEP's Soil Remediation Standards (NJDEP, May 17, 2021) and Ground Water Quality Standards (NJDEP, January 2, 2025).

The effective implementation of the applicable laws and guidance will be managed and overseen by a Licensed Site Remediation Professional (LSRP) 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/CRA to the NJDEP, which retains the authority to audit the project and/or review and potentially reject any documents submitted.

4 EVALUATION OF CLEANUP ALTERNATIVES

This section identifies various remediation alternatives that were considered in response to the impacts identified at the Yaffa site. It should be noted that this analysis pertains only to site soils. Site impacts related to groundwater are still under investigation. The following potential remedial alternatives for site soils were considered:

Alternative No. 1) No action;

Alternative No. 2) Shallow Soil Removal;

Alternative No. 3) Site-wide Soil Removal (all Lots)

The following evaluation criteria were considered in comparing the remedial alternatives.

A. Effectiveness in providing compliance with NJDEP regulations and increased protectiveness to public health and the environment;

B. Implementability of the considered alternative;

C. Cost of the considered alternative; and

D. Sustainability and resilience considerations.

4.1 Alternative No. 1 - No Action

If no environmental cleanup remedy were performed at this site:

- The site would remain out of compliance with NJDEP's regulations and remain a source of nonpoint source pollution;
- The redevelopment planning of the Bergen Square neighborhood would not be possible.

4.1.1 Effectiveness

The "no action" alternative is not effective in that it does not provide for compliance with NJDEP regulations, does not address a source of neighborhood contamination, and it fails to provide for the beneficial reuse of the site.

4.1.2 Sustainability and Resilience

The "no action" approach would not meet project remediation goals because the contamination would remain in place, untreated, and remain a significant source of nonpoint source pollution. As such, the "no action" approach would present a continuing risk to the public. Based on this, evaluation of the approach with regards to other sustainability criteria is not relevant.

4.1.3 Implementability

The "no action" alternative is technically feasible, although the presence of unremediated soil contaminants would not be in compliance with NJDEP regulations.

4.1.4 Operation and Maintenance

Because there is no remedy implemented, there would also be no operation and maintenance requirements at the site.

4.1.5 Institutional Controls

As no action is taking place under this alternative, no institutional controls are proposed.

4.1.6 Cost

There would be no financial costs associated with this alternative.

4.2 Alternative No. 2 – Shallow Soil Removal

Under this alternative, the remedial action will include removal of shallow contaminated soil. Remediation is necessary to address contamination that is present beneath the former soil piles and associated with several other AOCs.

This remediation will require an Engineering Control, and recording of a deed notice for COCs left behind in soil. A virtual groundwater classification exemption area (CEA) as Institutional Controls may also be required (to be determined).

This remedy will prevent exposure to areas with high concentrations of contaminants including metals (Lead up to 22,300 ppm and Arsenic up to 57.7 ppm), PCBs, SVOCs, and PFAS. Lower levels of COCs detected deeper than 2 eet below grade (fbg) across the site will be capped. Further details of the remediation plan would include:

- Approximately 100 tons of PCB-impacted soil will be removed on average to 2 feet below grade (fbg) and disposed of off-site as part of a United States Environmental Protection Agency (EPA) Self Implementing Cleanup Plan (SIP), which will be prepared in accordance with the Toxic Substances Control Act (TSCA).
- Approximately 7,644 tons of metal, SVOC, and PFAS -impacted soil will be removed to 2 fbg and disposed of off-site.
- Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility. The tasks will also include post-excavation sampling and analysis, and the stabilization of remaining site soils.
- Emplacement of demarcation fabric and 7,764 tons of approved clean backfill to provide an engineered cap installed over remaining concentrations of COCs, to provide a barrier to the remaining contaminants in site soils. The cap will be comprised of a mixture of permeable (e.g., imported clean soil) and low permeability (e.g., paved areas and new building structures) materials, and will be installed in any areas of the site in which soil contaminants remain at concentrations above NJDEP soil remediation standards.
- 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.
- Restore site with topsoil and seed.
- 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, an indefinite duration groundwater Classification Exception Area (CEA) may be established to prohibit groundwater use on the site (to be determined).

Selection of this alternative will result in an informed redevelopment plan for the future use of the site and surrounding neighborhood. However, some contaminants would be left in place.

4.2.1 Effectiveness

The soil removal approach may not physically remove all site soil and groundwater contaminants. However, this alternative would partially achieve project remediation goals by:

- Disruption of the pathway of contaminated fill material to the outside environment.
- Removing a significant source of impacts from metals, PCBs, SVOCs, and PFAS but leave lower levels of COCs behind in soil.

4.2.2 Sustainability and Resilience

This criterion evaluates the degree to which the remedial alternative may reduce greenhouse gas discharges, reduce energy use, employ alternative energy sources, reduce volume of wastewater to be disposed, reduce volume of materials to be taken to a landfill, and/or allow for the reuse or recycling of materials during cleanup is considered, where applicable. The hot spot soil removal approach compares favorably to Alternative 3 (described in Section 4.3) with regard to sustainability and resilience metrics. The approach would result in decreased energy use, greenhouse gas emissions, and landfill disposal volume.

However, this approach provides less protectiveness of the remedy in light of reasonably foreseeable changing climate conditions such as increased precipitation and flooding events as some source material will be left in place.

4.2.3 Implementability

Removal of hot spots in soil is a conventional means of addressing contaminants associated with impacted fill material.

The City/CRA will procure a contractor that is licensed, qualified, and OSHA-certified to perform work on hazardous materials sites. A Remedial Action Rport, prepared by the LSRP in accordance with NJDEP guidance, is a relatively routine submission to document remedial activities.

4.2.4 Operation and Maintenance

Operation and Maintenance of existing gravel cover over any remaining metal-impacted soils would be necessary until such time that a clean soil cap could be installed. Operation and Maintenance on any installed soil cap should include the following:

- Routine inspections;
- Vegetation maintenance (grass mowing and weed control); and

- Written O&M Plan that includes a discussion including but, not limited to; soil cover maintenance, reporting, maintenance agreement, a utility plan should future utilities or building be proposed at the Site, and fence maintenance (if applicable).

4.2.5 Institutional Controls

Engineering Controls and Institutional Controls will be required for any remaining metal-impacted soils and a CEA may be established to prohibit groundwater use on the site.

4.2.6 Cost

The costs for completing remediation under this approach were estimated using the following elements and assumptions:

1) Project and Grant Management tasks, including public notification;
2) LSRP Oversight of remediation and cleanup activities.
3) Prepare project specifications and bid documents;
4) Conduct procurement process to obtain remediation contractor;
5) Prepare SIP for EPA review and approval.
6) Prepare Quality Assurance, and Health and Safety deliverables.
7) Removal of approximately 7,764 tons of impacted soil to an average depth of 2 fbg;
8) Site restoration, including emplacement of geotextile, 7,764 tons of clean backfill to install soil cap, top soil and seed, and fencing installation;
9) Prepare Remedial Action Report and other regulatory reporting requirements;
10) On-going Operation and Maintenance.

The estimated cost for this cleanup alternative is $1,228,837.33.

4.3 Alternative No. 3 – Site-wide Soil Removal (all Lots)

Under this alternative, the remedial action will include removal of all site-wide impacted fill material and soil hot spots to a minimum depth of 2 fbg and as deep as 9 fbg. Most impacted soil is found between 1.5-2 fbg; however, three samples at 4.5-5 fbg (TP-3 SVOCs; TP-12 PCBs; GP-111 PFAS) and one sample at 8.5-9 fbg (GP-2 metals and PFOA) exhibit impacts above applicable standards. Further details of the remediation plan would include:

- Approximately 11,616.00 tons of impacted soil will be removed to a maximum depth of 9 fbg and disposed of off-site. Approximately 100 tons of that material will be removed as part of a SIP, which will be prepared in accordance with TSCA.
- Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility. The tasks will also include post-excavation sampling and analysis, and the stabilization of remaining site soils.
- Emplacement of 11,700 tons of approved clean backfill to cover sitewide excavations.
- Restore site with topsoil and seed.

Selection of this alternative will allow for an informed redevelopment plan with more flexibility for the future use of the site and surrounding neighborhood.

4.3.1 Effectiveness

The site-wide soil removal approach will physically remove all site soil and groundwater contaminants.

4.3.2 Sustainability and Resilience

The site-wide soil removal approach compares less favorably to Alternative 2 (described in Section 3.2) with regard to sustainability and resilience metrics. The approach would result in increased energy use, greenhouse gas emissions, and landfill disposal volume.

However, this approach provides protectiveness of the remedy in light of reasonably foreseeable changing climate conditions such as increased precipitation and flooding events as the source material will be removed.

4.3.3 Implementability

This alternative is feasible and implementable. This approach will involve soil excavation and is a conventional means of addressing contaminants associated with impacted fill material.

The City /CRA will retain a contractor that is licensed, qualified, and OSHA-certified to perform work on hazardous materials sites. A Remedial Action Report, prepared by the LSRP in accordance with NJDEP guidance, is a relatively routine submission to document remedial activities.

4.3.4 Operation and Maintenance

Operation and Maintenance is not required.

4.3.5 Institutional Controls

This alternative will likely not require Institutional Controls.

4.3.6 Cost

The costs for completing remediation under this approach were estimated using the following elements and assumptions:

1. LSRP Oversight of remediation and cleanup activities;
2. Project and Grant Management tasks, including public notification;
3. Prepare SIP for EPA review and approval Prepare project specifications and bid documents;
4. Prepare Quality Assurance, and Health and Safety deliverables;
5. Conduct procurement process to obtain remediation contractor;
6. Removal of approximately 11,616.00 tons of impacted soil to a maximum depth of 9 fbg;

7. Site restoration, including emplacement of fill material, top soil and seed, and fencing/barrier installation;
8. Prepare Remedial Action Report and other regulatory reporting requirements.

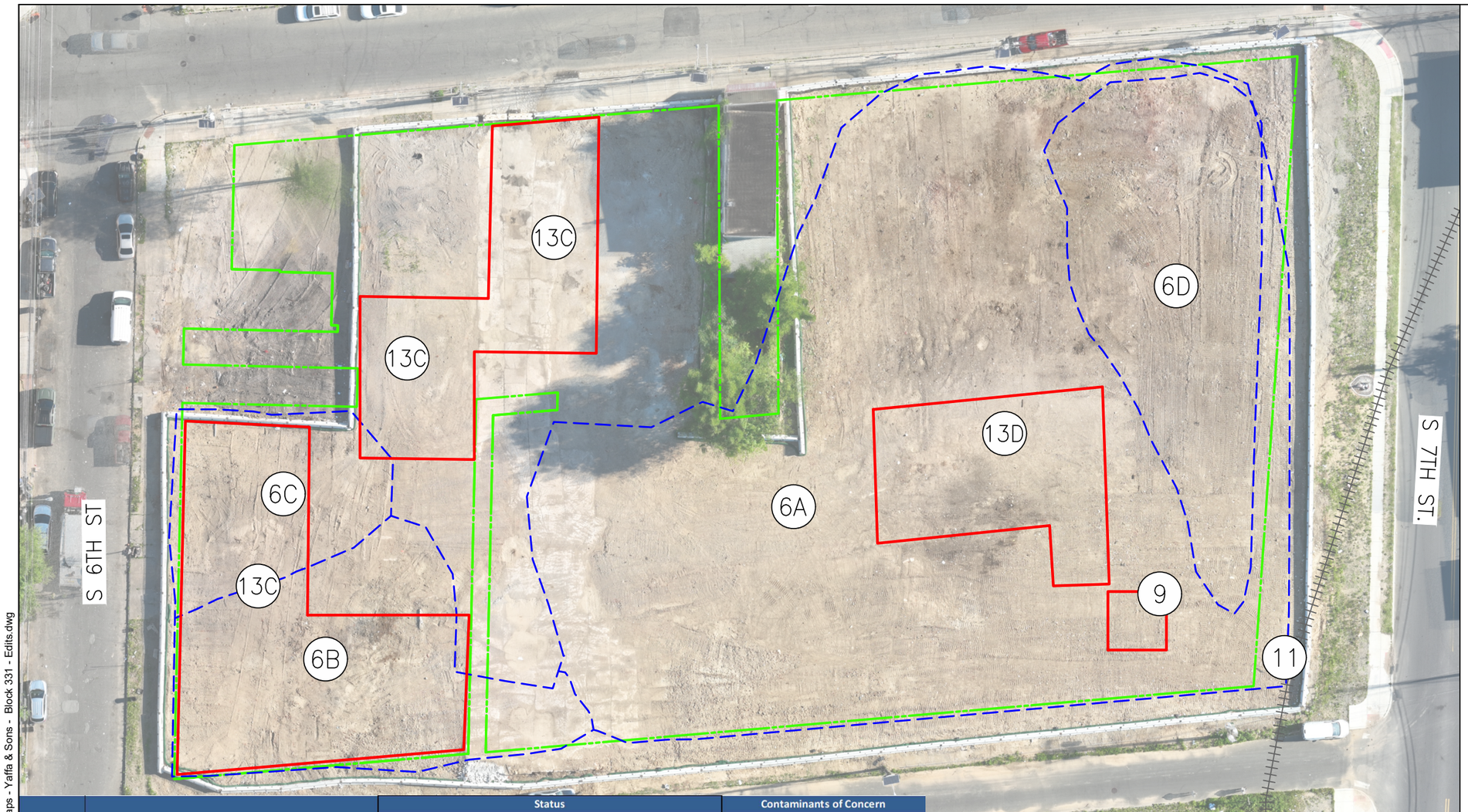
The estimated cost for this cleanup alternative is $1,451,362.40.

4.4 Preferred Alternative

The preferred alternative is Alternative No. 3 – Site-wide Soil Removal (all Lots). Soil excavation and removal is a proven method, environmentally effective and productive for long term, community-wide use. Excavation equipment is readily available. Soil excavation as proposed eliminates direct contact with fill contaminants.

The remedial remedy can be completed within the timeframe of the USEPA Brownfields Cleanup monies.

Attachment A
Site Location Map



AOC ID	Description	Status					Contaminants of Concern				
		SI Conducted?	RI Conducted?	Need Addl Delineation?	RA Conducted?	Can be Closed?	EPH	SVOCs	PCBs	PFAS	Metals
AOC-1	Former Heating-Oil Tanks (Lots 46 and 50)	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AOC-2	Former Gasoline/Diesel-Fuel Tank, Removed 11/18/02	Yes	No	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A
AOC-3 *	Loading/Unloading Areas for Trash and Demolition Debris	Yes	Yes	Yes	No	No		X	X	X	X
AOC-4 *	Storage Pads, Including Drum and/or Waste Storage	Yes	Yes	Yes	No	No		X	X	X	X
AOC-5	Stormwater Collection System	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AOC-6a	Pile B – Soil and Mixed / Unprocessed Materials	Yes	Yes	Yes	No	No		X	X	X	X
AOC-6b	Pile C – Unprocessed Concrete, Brick, Block	Yes	Yes	Yes	No	No		X	X		X
AOC-6c	Pile D – Mixture of Screened Soil and Debris	Yes	Yes	No	No	No		X			
AOC-6d	Solid Waste Beneath Pile B	Yes	Yes	Yes	No	No		X	X	X	X
AOC-7 *	Historical Fill	Yes	Yes	Yes	No	No		X			X
AOC-8	Three Pole-Mounted Electrical Transformers	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AOC-9	Spill # 96-04-19-0840-37: Spills from trucks and crane	Yes	Yes	No	No	No					X
AOC-10	Spill # 23-03-27-1509-15: Stained soil beneath equipment	Yes	Yes	No	Yes	Yes	X				
AOC-11	Former Railroad Spur	Yes	Yes	Yes	No	No		X			
AOC-12	Former Residential Dwellings	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AOC-13a	Steam Fitting Shop	Yes	No	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A
AOC-13b	Greenhouse	Yes	No	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A
AOC-13c	Junk Storage Areas	Yes	Yes	Yes	No	No		X			X
AOC-13d	Automotive Repair	Yes	Yes	No	No	No		X	X		X
AOC-13e	Yaffa Paper Stock Warehouse	Yes	No	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A
AOC-13f *	Yaffa Scrap Metal Operations	Yes	Yes	Yes	No	No		X	X	X	X
AOC-13g *	Weyhill Soil/Debris Stockpiling Operations	Yes	Yes	Yes	No	No		X	X	X	X
AOC-14	Coal & Wood Yard - 621 Kaighn Ave	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AOC-15	Historical Cleaners - 1136 Baring Street	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

LEGEND

- SITE BOUNDARY
- FORMER RAILROAD SPUR
- FORMER PILE BOUNDARIES AS MAPPED BY VARGO ASSOCIATES
- AREA OF CONCERN

NOTES:
1. JUNE 2024 AERIAL IMAGERY PROVIDED BY TPI ENVIRONMENTAL
2. ONLY "OPEN" AOCS REQUIRING INVESTIGATION/REMEDIATION ARE SHOWN ON THIS FIGURE

* = SITE–WIDE AREA OF CONCERN (AOC)
N/A = NOT APPLICABLE
SI = SITE INVESTIGATION
RI = REMEDIAL INVESTIGATION (DELINEATION)
RA = REMEDIAL ACTION
EPH = EXTRACTABLE PETROLEUM HYDROCARBONS
SVOCs = SEMI–VOLATILE ORGANIC COMPOUNDS
PCBs = POLYCHLORINATED BIPHENYLS
PFAS = PER– AND POLYFLUOROALKYL SUBSTANCES

0 20 40 80

1 INCH = 40 FT

S. YAFFA & SONS, INC.

616 CHESTNUT STREET ET AL,
CITY OF CAMDEN, CAMDEN COUNTY NJ 08103, BLOCK 331,
NJDEP PI # 025881, ACTIVITY # LSR160001

AREA OF CONCERN MAP

MONTROSE ENVIRONMENTAL
MONTROSE ENVIRONMENTAL SOLUTIONS, INC.
500 HORIZON DRIVE SUITE, 540
ROBBINSVILLE, NEW JERSEY 08691
T: 609.890.7277 montrose–env.com

Scale:	1" = 40'
Drawn By:	MN
Checked By:	ES
Project Mgr.:	CDV
Originated By:	MCB
Project No.:	11595–04
Drawing Date:	11/26/2025
Sheet No.:	OF
Revision Number:	1

FIGURE 3

H:\Camden Redevelopment Agency\11595-04 Yaffa Block 331 Soil RI\Figures\CAD\SI Maps - Yaffa & Sons - Block 331 - Edits.dwg

DRAFT

TO BE INSERTED AFTER PUBLIC MEETING

ATTACHMENT B

Summary of Public Comments and Responses

BRS inc