Analysis of Brownfields Cleanup Alternatives

DRAFT

Block 331 of Former S. Yaffa & Sons Inc Facility
616 Chestnut Street et al.
Block 331
City of Camden
Camden County, New Jersey

NJDEP Case No. 23-03-27-1509-15
NJDEP PI # 025881

Prepared by BRS, Inc. for the

City of Camden
520 Market Street
City Hall
Camden, NJ 08101-5120

October 2024

CONTENTS

ATTACHMENTS

1 INTRODUCTION & BACKGROUND

The Site is part of the former S.Yaffa & Sons Inc. operations. The portion of the former S. Yaffa & Sons, Inc operations that is the subject of this Analysis of Brownfields Cleanup Alternatives (ABCA) is comprised of multiple tax parcels occupying almost the entire area of Block 331 on the City of Camden tax maps and is located at 616 Chestnut Street in the City of Camden, Camden County, New Jersey (Site). The Site encompasses an aerial extent of approximately 1.61 acres and is currently unoccupied.

Brownfield Redevelopment Solutions, Inc. (BRS) has been contracted to prepare this ABCA in support of the EPA grant proposal. 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 City will promote and facilitate community involvement with the environmental cleanup and Site redevelopment project with the activities itemized below.

- The City will perform targeted outreach to notify communities of the availability of this Draft ABCA. This includes fulfillment of the New Jersey Department of Environmental Protection community notification requirements (N.J.A.C. 7:26E-1.4). The City will publish a notice of availability of this Draft ABCA in one or more major local newspapers or equivalent with general circulation in the target community.
- The City will provide an opportunity for members of the public to comment on the ABCA in a public meeting. Additional details regarding the public notification process will be presented in a *Community Relations Plan* to be prepared for the Site.
- The City will prepare written responses to the comments received and document 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 by the City. The final ABCA and the Decision Memo will be included with the Administrative Record. The Administrative Record repository is located on the website of the Camden Redevelopment Agency at http://camdenredevelopment.org/Projects/Brownfield-Projects/Weyhill-Yaffa-Site-(To-Come).aspx.

The expected outcome of the project includes a Response Action Outcome (RAO) letter to be issued by a New Jersey Licensed Site Remediation Professional (LSRP).

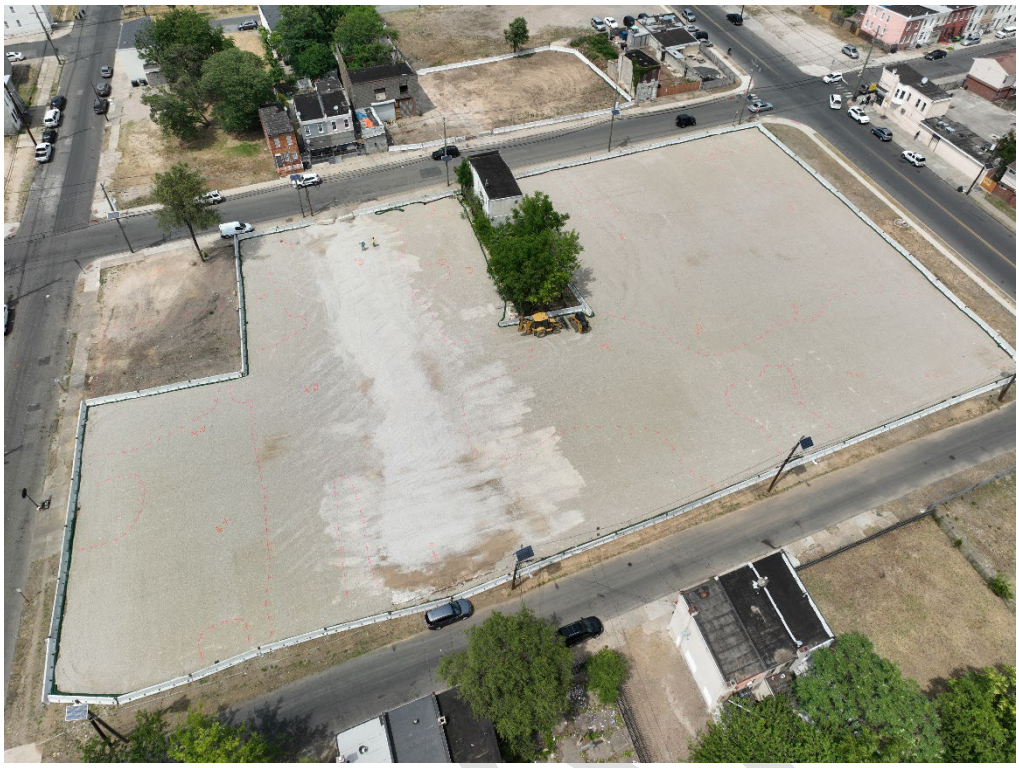
1.1 Site Description and Previous Uses

The Block 331 Site parcels were developed as early as 1891, with the original structures being residences and limited stores. Property use as a junk yard facility likely began as early as 1926, when the Sanborn Maps label two areas of the property as "Junk". Historical information between 1926 and 1950 indicate that the junk yard/storage operations began expanding. Residential dwellings continued to be demolished in the 1950s through 1994. A paper stock warehouse appeared in 1950 through 1994. In recent years, three large stockpiles containing contaminated soil, construction debris material, and trash were illegally imported to and stored on the Site, predominantly the eastern portion of the Site. This stockpiled contaminated material was removed for proper off-site disposal from 2023 to 2024. Historical fill material is present throughout the entire Site based on field observations and environmental records on nearby properties.

The Site has been in the Yaffa name since from at least 1932 until 2019. According to NJDEP records, Yaffa's Sons Inc imported scrap metals, junk, and soil into the facility. Inspections by NJDEP indicated that Yaffa was illegally stockpiling construction debris material in 2018.The property was transferred in 2019 to Weyhill Realty Holdings, LLC (Weyhill). NJDEP records indicate that Weyhill continued to accept, process, and stockpile soil materials at the site without required permits in 2020. The City of Camden and State of New Jersey cited Weyhill with various violations and court orders to remove the illegally stockpiled material. As Weyhill was subsequently found to be in contempt of the court ordered removal, with authority from the Camden County Health Department, an order to abate a public nuisance was issued in August 2022. This enabled the City to enter the site and facilitate the removal of the stockpiled soil. In parallel, the City of Camden acquired most of the Site in November 2022 (some lots were acquired earlier). All acquisition occurred through tax foreclosure.

A Preliminary Assessment (PA) and Site Investigation (SI) was completed by by Montrose Environmental Solutions, Inc. in August and October 2024 and contamination from historic uses and historic fill material was confirmed in soil. Certain metals such as lead and arsenic, polycyclic aromatic hydrocarbons (PAHs), and low-level concentrations of polychlorinated biphenyls (PCBs) have been detected in surface soil at several locations across the site.

Most of the former Yaffa facility on Block 331 was surrounded by a metal sheeting perimeter fence. This was recently removed and replaced with low concrete barriers. All formerly stockpiled material has been removed and approximately 4 inches of clean ¾-inch stone has been laid across the Site. The photo below depicts the current conditions at the Site. The approximate Site boundary is outlined with fencing in the form of the jersey barriers that can be seen below.



1.2 Surrounding Land Use

Currently, one residence remains on Block 331, fronting Chestnut Avenue. The City is in the process of acquiring this property and is likely to have ownership before the end of 2024. An adjacent property south of the Site, located at 1115 S 6th Street, is undeveloped but was a former coal & wood yard based on Sanborn maps. Chestnut Street is located north, across which are residential and other formerly owned Yaffa properties. South 6th and South 7th Streets are located to the west and east.

1.3 Project Goal (Reuse Plan)

The goal of the project is to address contamination in order to facilitate redevelopment for residential and/or commercial reuse. Remediation will address shallow contaminated soil associated with historic site use and historic fill.

1.4 Summary of Environmental Conditions

Following completion of a Preliminary Assessment (PA) and Site Investigation (SI) by Montrose Environmental Solutions, Inc. in August and October 2024, contamination was confirmed at the following Areas of Concern (AOCs) and require remediation:

- AOC-3: Loading/unloading areas for trash and construction debris
- AOC-4: Storage pads, including drum and/or waste storage
- AOC-6: Waste Piles

- AOC-7: Historic Fill
- AOC-9: Spills from trucks cranes, and containers
- AOC-11: Former railroad spur
- AOC-13: Former on-site operations

Historic fill was found to be present to an average depth of two feet across the property during SI activities conducted in September 2024. The site's soil is impacted by metals, including arsenic (maximum of 22.6 ppm), mercury, (maximum of 7.4 ppm), and lead (maximum concentration of 7,330 ppm), and polycyclic aromatic hydrocarbons (PAHs) at depths ranging from one foot to three feet below grade. In addition, low-level concentrations of polychlorinated biphenyls (PCBs) with a maximum concentration of 17 ppm have been detected in surface soil in locations associated with junk storage and automotive repair (AOCs 13C and 13D).

The site's groundwater contains dissolved concentrations of metals, consistent with the historic fill material identified in the soil. As a result, an indefinite term Classification Exception Area (CEA) will likely be established for the site to prevent future groundwater use. If deemed necessary, this virtual CEA will be prepared and submitted to NJDEP as part of future investigation activities.

- Mercury, lead, arsenic and other metals exceeded the Soil Remediation Standards for the Migration to Groundwater Pathway (SRSMGW) in soil samples collected.
- Arsenic, nickel, antimony, cobalt and lead exceeded NJDEP Non-Residential Direct Contact Soil Remediation Standards (NRDCSRS) in shallow soil samples collected from TP-8, while lead was detected above NRDCSRS in shallow soil samples across the site.
- A total of seven PAHs exceeded NJDEP SRS in shallow soil samples.
- PCBs exceeded NJDEP residential SRS (RSRS) of 0.2 ppm and the non-residential SRS (NRSRS) of 1 ppm. Concentrations of PCBS range between 17 parts per million (ppm) and 0 ppm.
- All soil results for volatile organic compounds (VOCs) were below the NJDEP SRSs. Per- and Poly-fluoroalkyl Substances (PFAS) met the interim Direct Contact SRS.

Additional limited, targeted investigation activities will be conducted prior to implementing the remediation in order to refine the extent of contamination associated with test pit TP-8, where mercury and nickel are present above SRSMGW at 8 feet below grade,

and locations associated with junk storage and automotive repair (AOCs 13C and 13D), where PCB soil contamination is present above NRSRS[1].

1.5 Physical Setting

The Site is located at approximately 20 feet above sea level. The general topography of the Site is relatively flat. Regional topography in the vicinity of the Site slopes southwest towards the Delaware River.

The surface water bodies closest to the Site are the Cooper River (3,600 feet to the northeast) and the Delaware River (4,100 feet to the west).

Surficial geology is mapped as Unit 2 of the Cape May Formation, which is comprised of sand, pebble gravel, silt, clay, peat, and cobbles.

Groundwater wells installed within a block of the Site have encountered the groundwater table at approximately 15 to 20 feet bgs. The Site is located within the Potomac-Raritan-Magothy aquifer system, which consists of interlayered beds of quartz sand, silt, and clay. The aquifer system is the most heavily pumped in New Jersey and contains fresh water over an area of about 2,500 square miles and recharges by infiltration. The thickness of the aquifer near the outcrop in Camden County is approximately 250 feet.

1.6 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.

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

1. **Direct contact with Soil**. Soil might be handled, inhaled or ingested by occasional on-Site construction workers or trespassers. This exposure pathway will be eliminated immediately by implementation of the proposed cleanup activities, which includes excavation and off-Site disposal of contaminated soils.
2. **Direct Contact with, or Ingestion of, Groundwater.** Although there are no current or anticipated future uses of on-Site groundwater, an institutional control

[1] NJDEP does not acknowledge PCBs as a constituent of historic fill.

will be implemented to prevent future groundwater use caused by historic fill material.

2 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; the Technical Requirements for Site Remediation, N.J.A.C. 7:26E; and the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761. The most current versions of the NJDEP Technical Guidance documents will be referenced, including:

- *Historic Fill Guidance Document,*
- *Coordination of NJDEP and USEPA PCB Remediation Policies* updated September 18, 2023,
- *Presumptive and Alternate Remedy Guidance Technical Guidance Document,* and
- various other NJDEP guidance documents applicable to the project.

The USEPA Toxic Substance Control Act (TSCA) regulations provide a federal PCB remediation policy that must be coordinated with New Jersey Department of Environmental Protection (NJDEP) for PCB concentrations above 1 ppm. USEPA typically does not require PCBs to be cleaned up to levels less than 1 ppm. If PCB contamination exceeds 1 ppm, TSCA stipulates a range of self-implementing cleanup levels based upon future high and low occupancy scenarios that are identified in 40 CFR 761.61(a)4. These self-implementing remediation scenarios fall within PCB soil contamination ranges from 1 to 100 ppm. Soils impacted by PCBs at this site would be classified as PCB remediation waste with PCBs less than 50 ppm.

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 Soil Remediation Standards for the Migration to Groundwater Pathway (SRSMGW).

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.

3 EVALUATION OF CLEANUP ALTERNATIVES

This section identifies various reasonable remediation alternatives that were considered in response to the environmental contamination issues at the Site. The following potential remedial alternatives were considered:

Alternative No. 1) Removal of Soil and enactment of engineering and institutional controls.

Alternative No. 2) Removal of historic fill and PCB-contaminated soil sitewide, and

Alternative No. 3) No action.

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;

D. Sustainability and Resilience considerations, and

E. Reasonableness of the considered alternative. An alternative could be considered reasonable if it is based on sound judgment, gained through an objective assessment using all the relevant information and applying past experience.

3.1 Alternative No. 1 - Removal of Soil and Enactment of Engineering and Institutional Controls

Under this alternative, the remedial action will include removal of PCB-contaminated soil hot spots to approximately three feet below grade and removal of 8-inches of historic fill material site-wide, followed by installation of a permeable cap as Engineering Controls, and recording of a deed notice and a virtual 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:

- Preparation of a Remedial Workplan (RAW).
- Preparation of a Self-Implementing Cleanup Plan in accordance with TSCA regulations and submittal to EPA for review and comment.
- Excavation and disposal of approximately 3,507 tons of PCB-impacted soil and 2,046 tons of historic fill material.
- Following characterization of soil waste, transportation and disposal of soils at a licensed/permitted disposal facility.
- Backfill with certified clean fill (3,702 cubic yards) to complete capping of hot spots and site-wide fill material.

- 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.
- 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 and biennial certifications will be completed and submitted to NJDEP in perpetuity.
- 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.

3.1.1 Effectiveness

Although some residual contamination may still exist, institutional and engineering controls would effectively achieve project remediation goals by:

- Removing the most highly contaminated soil from the Site;
- Achieving technical and administrative compliance with the NJDEP site remediation regulations;
- Disruption of the pathway of contaminated material to the outside environment. Although the contamination still exists, the engineered cap will significantly reduce the potential for human exposure.
- Provide notice of Site environmental conditions to future Site owners, occupants, and the general public by means of the Deed Notice.

3.1.2 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.

When compared with alternative 2, this alternative limits excavation and truck transportation of contaminated media to areas with the highest contamination, thereby reducing the fossil fuel energy use, and associated greenhouse gas discharges associated with that task.

While the Site location itself does not fall within a low-lying area, there are some flooding concerns in areas surrounding the Site. With climate change conditions forecasted for the area, including increased temperatures and precipitation, the likelihood of extreme weather events (e.g., storms of unusual intensity, increased frequency and intensity of localized flooding events) also increases. Changing flood zones, saltwater intrusion, and higher

groundwater tables may impact the effectiveness of this alternative, as increased flooding of a site could compromise an engineered cap.

3.1.3 Implementability

Soil excavation and cap placement is easily and rapidly implementable because it involves relatively simple technology and equipment. This type of remedy is a widely used and readily accepted approach for remediating and encapsulating contaminated soils. The City and/or its consultant will retain a contractor that is licensed, qualified, and OSHA-certified to perform work on hazardous materials sites. The deed notice, prepared in accordance with NJDEP guidance, are relatively routine administrative submissions.

3.1.4 Operation and Maintenance

Operation and Maintenance on the installed soil cap should include the following:

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

3.1.5 Institutional Controls

This alternative will require the following Institutional Controls:

- A Deed Notice is required because contaminant concentrations above the RDCSRS and NRDCSRS are expected to remain below the engineered cap. A Deed Notice is required to document the extent of contamination and the engineering controls and will be issued pursuant to N.J.A.C 7:26C-7.
- All required NJDEP permits, reporting, and inspection requirements.
- Possibly, a CEA for groundwater.

3.1.6 Cost

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

1) Prepare Remedial Workplan (RAW);
2) Preparation of a Self-Implementing Cleanup Plan;
3) Project and Grant Management tasks, including public notification;
4) Site preparation including
   a) bid document generation,
   b) prepare Quality Assurance, and Health and Safety deliverables, and
   c) a survey of areas to be excavated.
5) Conduct procurement process;

6) Excavation and disposal of contaminated soil;

7) Procurement and testing of clean fill cap materials;

8) Emplacement of a cap over the Site;

9) Site restoration, including vegetative cover;

10) Prepare Deed Notice and possibly a CEA;

11) Prepare Soil Remedial Action Permits;

12) Prepare Operation and Maintenance Plan, Remedial Action Report and Response Action Outcome deliverables

The estimated cost for this cleanup alternative is approximately $1,633,388 .

3.1.7 Reasonableness

Soil excavation and the use of institutional and engineering controls is a proven method, easily and quickly implementable, environmentally effective, and cost-effective. Excavation equipment is readily available. Soil excavation is accepted by the NJDEP as a remedy for PCB-impacted soil and historic fill contamination. Some residual contamination will still exist beneath a cap, though restrictions on future use via the deed notice, O&M Plan, and on-going permit requirements such as reporting and cap inspections will achieve technical and administrative compliance with the NJDEP site remediation regulations. Other than the on-going permit requirements, this remedy can be completed within the timeframe of the USEPA Brownfields Grant.

3.2 Alternative No. 2 - Removal of Historic Fill and PCB-contaminated Soil Sitewide

Under this alternative, the remedial action will consist of removal of all PCB-impacted soil and historic fill above NJDEP's residential SRS and/or non- residential SRS down to native materials, estimated to be at an average depth of two feet Site-wide, and replacement with clean soil fill. Selection of this alternative is expected to result, upon completion, in unrestricted future use of the Site. No engineered cap would be installed, as no contaminated materials would remain on Site. No Institutional Controls would be needed. Further details of the remediation plan would include:

- Preparation of a Remedial Workplan (RAW).
- Preparation of a Self-Implementing Cleanup Plan in accordance with TSCA regulations and submittal to EPA for review and comment.
- Excavation and disposal of approximately 8,961 tons of impacted soil.
- Following characterization of soil waste, transportation and disposal of soils at a licensed/permitted disposal facility.
- Backfill with certified clean fill.
- Installation of clean soil (5,974 cubic yards) site-wide.

- 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.

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

3.2.1 Effectiveness

This alternative would be immediately effective by removal of the potential continuing contaminant sources associated with the presence of historic fill from the Site. The remedial action should result in unrestricted use of all areas of the Site.

3.2.2 Sustainability and Resilience

This alternative compares unfavorably to Alternative 1 (described in Section 3.1) with regard to sustainability metrics. The approach would result in increased energy use, greenhouse gas emissions, and landfill disposal volume. It is expected to compare favorably to Alternatives 1 and 3 in resilience metrics, such as the continuing protectiveness of the remedy in light of reasonably foreseeable changing climate conditions.

3.2.3 Implementability

This alternative is feasible and implementable. This approach will involve the work elements described in Section 3.1, with the exception of the emplacement of a clean soil cap and deed notice, plus additional volumes of excavated soil and clean backfill.

3.2.4 Operation and Maintenance

This approach, upon successful implementation, would allow for unrestricted use of the Site. No ongoing operation and maintenance of remedial systems would be required.

3.2.5 Institutional Controls

This approach, upon successful implementation, would provide for the removal of all contaminated soil from the Site. No Deed Notice is required. As the current presence of historic fill materials is the reason that a groundwater CEA is required under other scenarios, a CEA may not be required if the historic fill is removed from the Site.

3.2.6 Cost

To implement this strategy, all contaminated soil would be excavated, disposed, and replaced with clean fill. Total project costs for this alternative are estimated at over $2 million.

3.2.7 Reasonableness

Soil excavation is a proven method, easily and quickly implementable, environmentally effective, and cost-effective. Excavation equipment is readily available. Soil excavation is accepted by the NJDEP as a remedy for PCB-impacted soil and historic fill contamination.

This alternative will remove all PCB-impacted soil and historic fill above NJDEP's residential SRS and/or non- residential SRS down to native materials and will remove the burden of maintaining institutional and engineering controls. This remedy can be readily completed within the timeframe of the USEPA Brownfields Grant.

3.3 Alternative No. 3 - No Action

If no environmental cleanup remedy were performed at this Site:

- The Site would remain out of compliance with NJDEP's regulations; and
- The potential for exposure to contaminated soil and water by human and ecological receptors would remain.

3.3.1 Effectiveness

The "no action" alternative is not effective in that it does not provide for compliance with NJDEP regulations and it fails to provide for the beneficial reuse of the Site.

3.3.2 Sustainability and Resilience

The "no action" approach would not meet project remediation goals because the contamination would remain in place, untreated, and without a barrier. 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.

3.3.3 Implementability

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

3.3.4 Operation and Maintenance

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

3.3.5 Institutional Controls

Because there is no remedy implemented, there would be not institutional controls at the Site.

3.3.6 Cost

There are no costs associated with this remedial alternative.

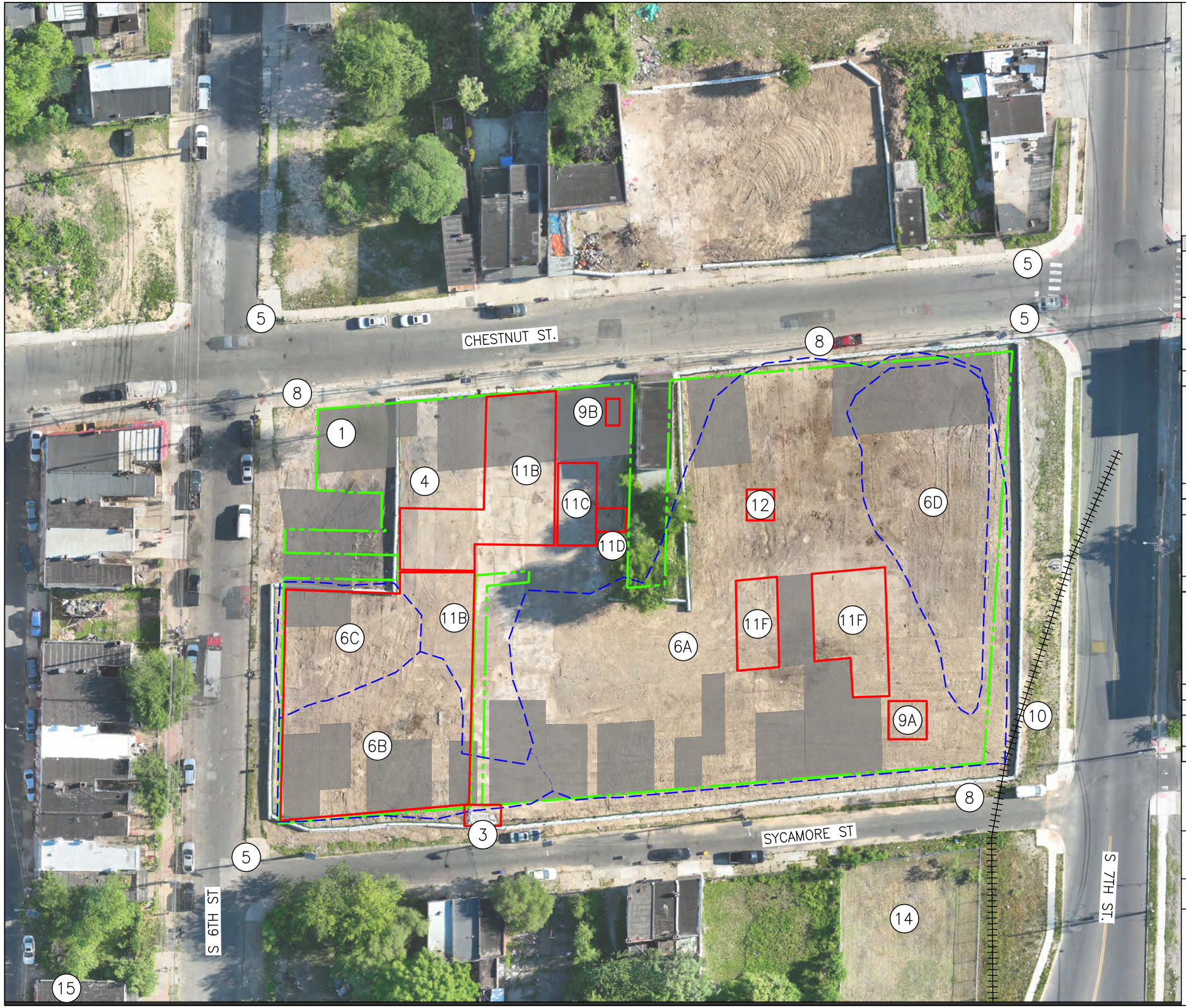
3.3.7 Reasonableness

The "no action" alternative is not effective in that it does not provide for compliance with NJDEP regulations and it fails to provide for the beneficial reuse of the Site. Taking no action is not environmentally effective as this approach would present a continuing risk to the public.

3.4 Preferred Alternative

The preferred alternative is Alternative No. 2 – "Removal of Historic Fill and PCB-contaminated Soil Sitewide". Soil excavation is a proven method, easily and quickly implementable, environmentally effective, and cost-effective. Excavation equipment is readily available. Soil excavation is accepted by the NJDEP as a remedy for PCB-impacted soil and historic fill contamination. Moreover, this alternative will remove the burden of maintaining institutional and engineering controls as all PCB-impacted soil and historic fill above NJDEP's residential SRS and/or non-residential SRS will be removed. This remedy can be readily completed within the timeframe of the USEPA Brownfields Grant.

Attachment A
Site Location Map



LEGEND

- FORMER PILE BOUNDARIES AS MAPPED BY VARGO ASSOCIATES
- SITE BOUNDARY
- FORMER RAILROAD SPUR
- FORMER DWELLING LOCATIONS

NOTES:
1. JUNE 2024 AERIAL IMAGERY PROVIDED BY TPI ENVIRONMENTAL
2. * AOC NOT SHOWN (REFERS TO ENTIRE SITE).

AOC ID	Sub-AOCs	General Description
AOC-1		Suspected 1,000-gallon No. 2 heating oil AST at 616 Chestnut Street and 275-gallon heating oil AST at 604 Chestnut Street (Lot 46).
AOC-2		Former 500-gallon gasoline/diesel UST at 616 Chestnut*
AOC-3		Loading and unloading area for trash and construction debris*
AOC-4		Three 55-gallon drums
AOC-5		Storm grate
AOC-6		Waste Piles, As Defined By N.J.A.C 7:26
	AOC-6a	Pile B - Soil Mixed/Unprocessed Materials Pile
	AOC-6b	Pile C - Unprocessed concrete, brick and block
	AOC-6c	Pile D - Mixture of screened soil and crushed construction debris
	AOC-6d	Yaffa Waste Pile - Tires and other solid waste
AOC-7		Historic Fill*
AOC-8		Three pole mounted electrical transformers
AOC-9		Spill Areas
	AOC-9a	Spill from trucks, crane and containers
	AOC-9b	Stained soil underneath former soil screening equipment
AOC-10		Former Railroad spur
AOC-11		Former Operations
	AOC-11a	Former Yaffa scrap metal operations*
	AOC-11b	Former Yaffa junk storage areas
	AOC-11c	Former Yaffa paper stock warehouse
	AOC-11d	Former steam fitting shop
	AOC-11e	Former Weyhill Realty Holdings, LLC *
AOC-12		Former Greenhouse
AOC-13		Former Residential Dwellings
AOC-14		Offsite Former Adjacent Coal & Wood Yard - 621 Kaighn Ave
AOC-15		Offsite Former Historical Cleaners – 1136 Baring Street

0 25 50 100

1 INCH = 50 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" = 50'
Drawn By:	MN
Checked By:	ES
Project Mgr.:	CDV
Originated By:	MCB
Project No.:	11595-03
Drawing Date:	06/17/2024
Sheet No.:	OF
Revision Number:	1

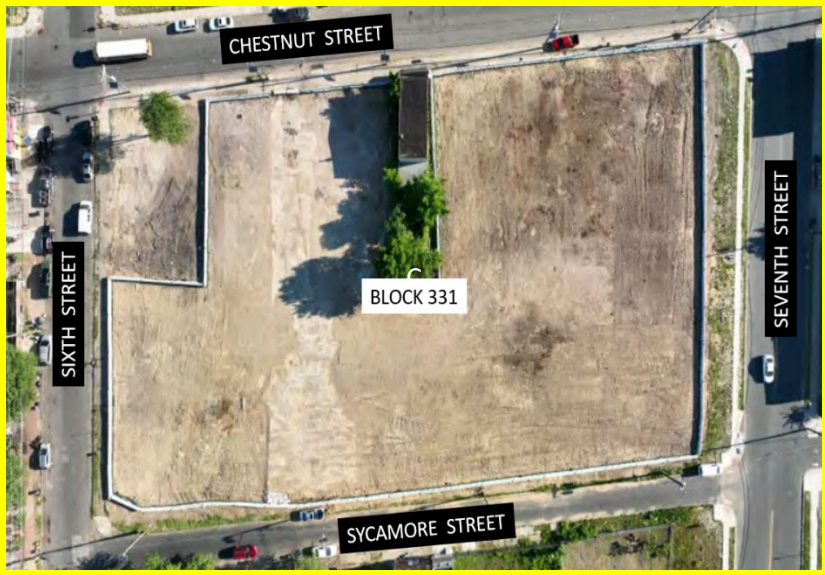
FIGURE 6

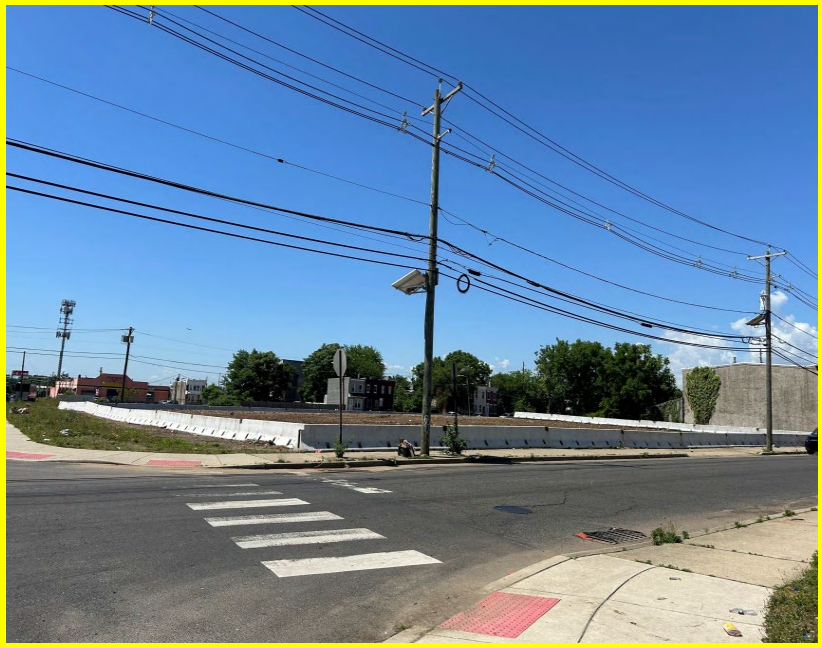
Attachment B
Summary of Public Comments and Responses

YAFFA SITE COMMUNITY MEETING

Tuesday, November 12th at 5:30 p.m.

KIPP Cooper Norcross High School at 740 Chestnut Street, Camden, NJ





USEPA Brownfield Cleanup Grant Application

The Camden Redevelopment Agency (CRA) on behalf of the City of Camden is seeking up to $4 million in grant funds from the U.S. Environmental Protection Agency (US EPA) to remedy suspected contamination at the former S. Yaffa & Sons (Yaffa) site.

- Overview of activities the City has completed for the Yaffa Site.
- Preliminary results of the environmental investigation and sampling.
- Opportunity to review and comment on the draft cleanup application.
- Introduction to the site redevelopment process.

For additional questions or information, please contact:

Mayor's Office of Constituent Services, 856-757-7200, Mayor@ci.Camden.nj.us, or
Olivette Simpson, Camden Redevelopment Agency, olsimpso@ci.Camden.nj.us, or
Megan Stanley, BRS, Inc., mstanley@brsinc.com

CITY OF CAMDEN New Jersey

Camden Redevelopment Agency

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

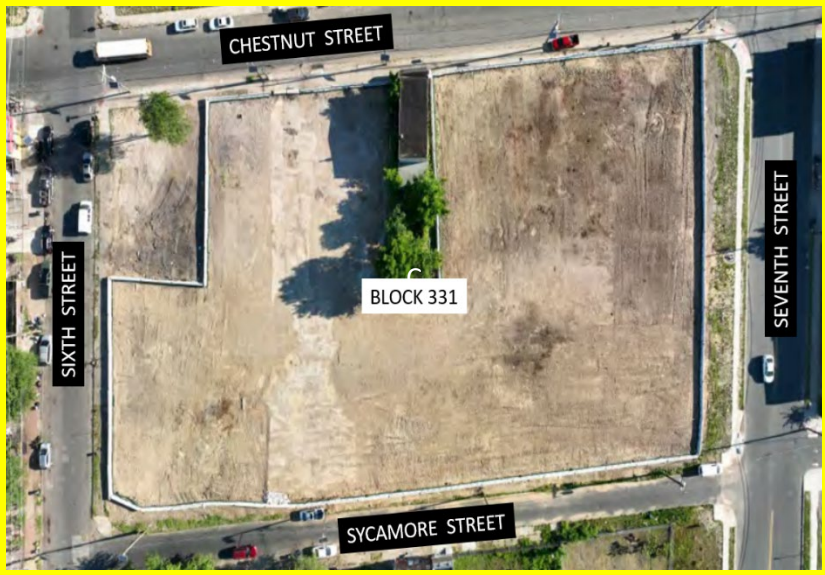
NJ EDA ECONOMIC DEVELOPMENT AUTHORITY

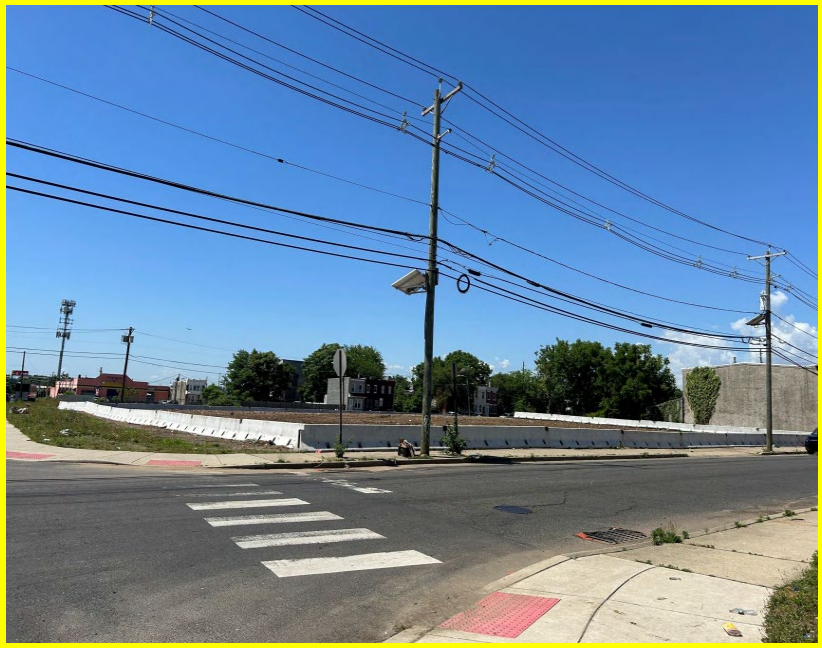
camden county Making It Better, Together.

REUNIÓN COMUNITARIA SOBRE EL SITIO DE YAFFA

Martes 12 de noviembre a las 17:30 h.

Escuela secundaria KIPP Cooper Norcross, 740 Chestnut Street, Camden, NJ





Solicitud de subvención US EPA para la limpieza de terrenos contaminados

La Agencia de Redesarrollo de Camden (CRA por sus siglos en inglés) en nombre de la ciudad de Camden busca una subvención de hasta 4 millones de dólares de la Agencia de Protección Ambiental de EE. UU. (US EPA) para remediar la contaminación sospechada en el antiguo emplazamiento de S. Yaffa & Sons (Yaffa).

En la reunión se tratarán los siguientes temas:

- Resumen de las actividades llevadas a cabo por la ciudad en el sitio de Yaffa.
- Resultados preliminares de la investigación y el muestreo medioambientales.
- Oportunidad de revisar y comentar el borrador de la solicitud de subvención.
- Introducción al proceso de reurbanización y desarrollo del sitio.

Si desea más información, póngase en contacto con:

Oficina del Alcalde de Servicios a los Ciudadanos, 856-757-7200, Mayor@ci.Camden.nj.us, o
Olivette Simpson, Agencia de Redesarrollo de Camden, olsimpso@ci.Camden.nj.us, o
Megan Stanley, BRS, Inc., mstanley@brsinc.com

City of Camden New Jersey · Camden Redevelopment Agency · New Jersey Department of Environmental Protection · NJ EDA Economic Development Authority · camden county Making It Better, Together.

EPA Grant Application PUBLIC MEETING

Tuesday November 12, 2024
Kipp Cooper Norcross High School
740 Chestnut Street, Camden, NJ

Yaffa Community Meeting - **Sign In Sheet**

	Name	Organization	Contact
1	Emily Arnold	BRS Inc	earnold@brsinc.com
2	DonnaArthur-Pettigrew	CRA	DoPettig@ci.camden.nj.us
3	Olivette Simpson	CRA	olsimpso@ci.camden.nj.us
4	Rev. Joseph C. Scott	Shalom Baptist Church	JScott9851@AOL.com
5	Kevin Banfield	Camden for Clean Air	~~Kevin~~ Camdenforcleanair@gmail.com
6	Arthur Barclay	Camden City	a.barclay53@gmail.com
7	TIM CUNNINGHAM	CAMDEN CITY	
8	Daniel Spearman	Camden Resident	Daniel.Spearman44@gmail.com
9	Angel Fuentes	Camden City Canal	angelfuentes1205@gmail.com
10	José Javier Ramos	Camden Redevelopment	intenso1@gmail.com
11	Tasha Gainey	CRA	TMG3473@yahoo.com
12	Kristoff F. Lindsey	Nyamekye Urban Farms	Krslnz@aol.com
13	Michelle Williams (267-239-7366)	Camden Resident	Micehlle789@gmail.com
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City of Camden / Camden Redevelopment Agency
Yaffa Community Meeting – EPA Cleanup Grant

Meeting Minutes

Tuesday, November 12, 2024 at 5:30 PM
KIPP Cooper Norcross High School at 740 Chestnut Street, Camden

A community engagement meeting was held on November 12, 2024 at KIPP Cooper Norcross High School at 740 Chestnut Street, Camden at 5:30. Olivette Simpson of the Camden Redevelopment Agency, Tim Cunningham of the City of Camden, and Michele Christina of BRS Inc. were in attendance to share the status of the soil pile removal on the site and the results of the environmental assessment activities that have been completed. They also introduced the proposed cleanup activities and application for USEPA funding as well as and reuse and redevelopment community planning. Mayor Carstarphen was also in attendance.

Questions/Comments

- Question: What do you do about contamination coming off the site and going into the stormwater?
    - Answer: During active construction activities silt fences are placed around the property and silt filters placed in the storm drains around the site, which kept the low level contamination from entering the stormwater. The property is currently covered with 4" of stone to keep the surface soil on the site from moving off the site.
- Question: What does it mean that we don't drink the water so the groundwater isn't a big concern?
    - Answer: Drinking water for the City of Camden comes from the public water supply and there are no wells on this property that people use as drinking water. No wells for drinking water will be allowed to be installed ever on this property. Also, due to the type of impacts we found in the shallow groundwater it's not likely to be highly mobile and move off the site.
- What will city do to make sure that is limiting the dust coming off the site?
    - Answer: When trucking is active during the cleanup we will know the trucking routes and keep them as away from the residential neighborhood as much as possible. To keep dust from coming off the site there will be a truck wash station, and if there is dust coming off the site they need to wet down the site to make sure that the dust doesn't become airborne.
    - Comment: The dust requirement wasn't met and there was dust leaving the site during the previous soil removal.
        - Response: We had some dust complaints and that the city responded by putting down a stone track pad at the front of the site to keep dirt from getting on the trucks' tires and increasing the use of street sweepers to clean up any dirt that did leave the site onto Chestnut Street. BRS Inc was

out there as a CRA representative several times a week, if there was an issue it was flagged and followed up on it.
    - Commenter posted to social media about the issue. If it happens again, call the number on the sign
- Question: Is there any way that the code enforcement can make sure the contractors are abiding by the dust requirements? Because contractors throughout the city don't follow the requirements.
    - Answer: If you are having an issue with anything such as dust, community members can call the contact number on the site sign. CRA will continue to have a client representative out on site to monitor activities for the public sites. CRA can't do much about the private development, but you could call the Mayor's Constituent Services line.
- Question: What do the boxes on the poster boards mean (maps of the site with lab data posted)?
    - Answer: The boxes are called chemboxes and tell the concentrations of the different analytes that we sampled. The colors are representative of the different state regulatory standards (residential, non-residential, or migration to groundwater), if it has the color it is exceeding it's regulatory standard.
- Question: Are the analytical results online?
    - Answer: Yes – the Phase II ESA draft report is online in the Yaffa repository on the CRA's website. The results are included in the report figures.
- Question: Why does the middle poster not have as many numbers?
    - Answer: The middle poster is showing the results of sampling for hydraulic oil associated with the vehicle storage/machinery storage area. It's a smaller sample area so there are fewer samples. That area has already been cleaned up. The left-most poster is from soil samples from September that is looking at PFAS. PFAS you might have heard in the news as "forever chemicals." PFAS might show up if there was a fire and fire suppression foam was used. Right now PFAS is an emerging contaminant because the state is figuring out what to do. All of the contamination will be addressed during the cleanup.
- Question: How much is the cleanup grant?
    - Answer: The EPA grant is for up to $4 million. We are applying for around $2 million based on the estimated cost of the cleanup.
    - Question: The initial amount was $5 million for removal of the mound? And that money is gone and you're going after a second grant?
        - Answer: Yes – we are applying to a $2 million dollar cleanup grant.
- Question: What is the chance that the DEP will support the project?
    - Answer: We already have their support letter for the cleanup grant application. This is a federal project so we are competing with everyone across the country, but we have had good success with receiving cleanup grants.
- Is the Bergen Square community group going to be involved with this project, the one with Martha C.?

    - Response from Community Member: That group is defunct as of now. Bergen Square does not have a redevelopment plan and is probably the last neighborhood to get a redevelopment plan. That group was working on it but since the group went under work on it stopped.
    - Comment: Community members in attendance would like to see the group restarted to get public input on a redevelopment plan. CRA is planning on reaching out to Martha to see if she would like to be involved.
- Question: Was there any follow-up/health assessment to see how the impacts impacted the local people?
    - Answer: It's very hard to establish causation from environmental impacts from an individual site, especially since the levels of impacts we see on this site are similar to the levels of historic fill that are found throughout the city. The city's recommendation is for you to talk to your primary care physician.
- Comment: There are only a few labs that can determine if there is PFAS.
    - Response: Correct, the number of labs that can analyze PFAS to the levels needed is limited.
      Response: PFAS is also an issue with the City's two municipal drinking water supply wells. As a city, Camden is working on retrofitting their public water supply wells with charcoal filters so that the drinking water is safe. This is already in place at the Parkside Water Supply. So even if there is PFAS on a specific site that doesn't mean that it's on your drinking water.
- Question: What is the reuse planning timeline?
    - Answer: Reuse planning is anticipated to start with a pizza party in January/February. Please let other community members know so there is a good turnout. Please help us get the word out. We want the room filled.
- Question: How was this meeting promoted? Because I didn't know about it until I was asked to cover the meeting?
    - Answer: Camden did an email blast, put it in the newspaper, and distributed over 200 flyers door to door. This is also the first time that we used KIPP to get stuff out to parents and families.
    - Community Suggestions:
        - Should be posted on facebook
        - Advertising should be put on sign in front of the site so people know when they drive by and can relate the meeting to the property.
        - Should also advertise in TAP into Camden
        - The people who are most invested are the older community members who are not online. So make sure to advertise in spaces that they can find.
        - The flyer doesn't provide enough details. People didn't know what the Yaffa site was or what the purpose of the meeting is. Include the intersection and a description of the site on the flyer as well as a picture of the site.
        - If you want to do an in-person meeting 6:00 is better to start physical meetings because people are getting off work at 5:00. But even if you

are doing a physical meeting you should have a zoom meeting so people can participate if they can't come in person and so the event can be archived.
        - Give a box of flyers to the local food distribution centers and they can put the flyer in the bag with the food.
- Comment: One community member would like the site to be used as a community garden with lots of trees.