



April 20, 2023

Electronic Mail Delivery Only

aflammia@brsinc.com

Camden Redevelopment Agency
c/o BRS, Inc.
Alicia Flammia
PO Box 2293
Medford Lakes, NJ 08055

RE: **MARCH 2023 DRUM REMOVAL AND DISPOSAL ACTIVITIES**
"S. Yaffa & Sons, Inc."
Camden County Blocks 331 and 324
Camden, New Jersey 08105

Dear Ms. Flammia:

Montrose Environmental Solutions, Inc. (Montrose) is pleased to present this letter report summarizing the drum removal and disposal activities conducted at the referenced property (the Site). These activities were conducted in accordance with the City of Camden Redevelopment Agency's (CRA's) January 16, 2023 Request for Pricing for Hazardous Waste Disposal Services – Drum Removal (RFP), Montrose's January 27, 2023 Cost Estimate for Removal and Disposal of Fifteen Drums, and the March 30, 2022 Service Agreement between CRA and Montrose.

1.0 BACKGROUND

The Site is located across portions of Block 331 and Block 324 on the City of Camden Tax Map in the City's Bergen Square neighborhood. The site occupies a combination of publicly-owned and privately-held properties bound by Mount Vernon Street to the North, 7th Street to the east, Sycamore Street to the south, and 6th Street to the west. Chestnut Street bisects the two blocks.

In September and October 2022, personnel from Montrose and BRS, Inc. were on-site to inspect the Site and perform activities associated with several waste piles believed to be generated from previous illegal dumping and storage of imported fill material. Once access to the Site was gained, numerous chemical storage drums were observed. These drums were sampled and characterized by Montrose in December 2023 and the findings were presented to the CRA in Montrose's January 6, 2023 Drum Characterization Sampling Summary Report. The locations of the drums are depicted on **Figure 1**.

This summary report documents the removal and disposal of the 15 drums inventoried and characterized at the Site.

2.0 DRUM REMOVAL

Montrose teamed with Miller Environmental Group (Miller) to manage the removal, transportation, and disposal of the drums. Montrose and Miller personnel mobilized to the Site on March 15, 2023 to perform the removal and disposal activities in conformance with the requirements of N.J.A.C 7:26G-1 et seq. (NJ Hazardous Waste Regulations). Copies of Miller's A-901 license and Certificate of Public Convenience and Necessity (CPCN) documentation (NJDEP CPCN 2021 Annual Utility Report) are included as attachments to this report in **Attachment 1**.

The following procedures were followed to remove and dispose of the drums:

- All drums were re-assessed to ensure integrity; overpacking was determined not to be necessary.
- All drums were loaded onto a NJDOT-compliant waste hauling vehicle and secured for transport according to NJDOT regulations and as required in the RFP.
- All drums were marked and labeled for shipment in accordance with NJDEPs Bureau of Hazardous Waste Compliance & Enforcement's waste tracking/manifest system.
- All drums except DRUM-03 were transported to the Monarch Environmental Class-D Recycling Facility in Woodstown, NJ for disposal.
- DRUM-03, which was identified as containing a total PCB concentration above 2 parts per million (ppm), was transported to the ACV Enviro TSD Facility in Elizabeth, NJ for disposal.
- Montrose/Miller managed the associated manifests and shipping documents as per the record-keeping requirements listed in the RFP.

While removing the drums from Block 324, Montrose noted loose stained soils on the concrete surrounding DRUM-01. The concrete appeared to be relatively good condition and is slightly elevated at the fence line, effectively limiting off-site runoff. After documenting Site conditions, Montrose personnel removed the loose material with a shovel and stored it in four 5-gallon buckets with lids, to be disposed of at a later date.

A photo log documenting these activities is presented as **Attachment 2**. Copies of the waste profiles and the final Bills of Lading (indicating certification of disposal) are presented in **Attachment 3**.

If you have any questions or comments regarding this summary report, please contact Christopher Valligny at 610.840.9195.

Sincerely,



Christopher D. Valligny, LSRP
Senior Scientist II

AWD:CDV:mm

Figures

Figure 1 – Site Plan and Drum Locations

Attachments

Attachment 1 – Miller Environmental's A-901 License and CPCN

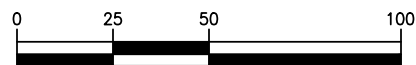
Attachment 2 – Photo Log

Attachment 3 – Waste Profiles and Final Bills of Lading (Certification of Disposal)

Figure



R:\projects\Camden Redevelopment Agency\1159511595-01 Yaffa PAST\CAD\Site Topo Figures\Drum Location Figure.dwg



1 INCH = 50 FT

LOCATION OF DRUMS CHARACTERIZED ON DECEMBER 1, 2022

AERIAL IMAGERY PROVIDED BY VARGO ASSOCIATES

S. YAFFA & SONS, INC.
CITY OF CAMDEN, NJ 08105
CAMDEN COUNTY BLOCKS 331 AND 324

SITE PLAN AND DRUM LOCATIONS



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

Scale:	1" = 50'
Drawn By:	CEP
Checked By:	AWD
Project Mgr.:	CDV
Originated By:	MCB
Project No.:	11595-01
Drawing Date:	1/3/23
Sheet No.:	OF
Revision Number:	

FIGURE 1

Attachments

Attachment 1 – Miller Environmental’s A-901
License and CPCN



New Jersey Department of Environmental Protection



A-901 License

This is to advise you that the investigative report from the Attorney General required under N.J.S.A. 13:1E-126 et seq. had been received by the Department of Environmental Protection (Department or NJDEP). Based upon the review of the investigative report, the Department is hereby issuing this replacement **A-901 License** to:

MILLER ENVIRONMENTAL GROUP, INC.

Please be advised that this license hereby issued is a “**conditional**” license and is modified by the terms and conditions as specified on the **attached document** as they have been put forth by the Office of the Attorney General (OAG) and the Department. **Failure to meet the specified conditions constitutes grounds for the revocation of this license.**

This A-901 approval **does not authorize the operation of any business entity or confer the authority to commercially engage in the solid waste, hazardous waste, or soil and fill recycling industry in New Jersey without all necessary permit and/or approvals in place.**

This license is only issued to Miller Environmental Group, Inc. (Licensee) for its exclusive use and control. You are required to notify the Department and the OAG, within 30 days of any changes regarding this company or its operations. In addition, this license must be renewed annually, by submitting the A-901 Annual Update (found at: <https://www.nj.gov/dep/dshw/a901/a901frms.htm>) to the OAG on or before November 1st of each calendar year.

Original Date Issued: January 24, 1996

Replacement Date: February 16, 2023

000587 – PI 209940

FEIN: 11-2256843

Signature: _____

A handwritten signature in blue ink, appearing to read "Roxanne Feasel", written over a horizontal line.

Roxanne Feasel, Permit Coordination Officer
NJDEP, Planning and Licensing, A-901 Unit

CONDITIONS OF A-901 LICENSE FOR MILLER ENVIRONMENTAL GROUP, INC. (Page 1-of-2)

Official Company Name - The State of New Jersey, Division of Commercial Recordings database indicates that this company is registered as Miller Environmental Group, Inc. (commercial record number: 0100625323), which is the official company name A-901 licensed in New Jersey. Therefore, you are required to conduct all solid waste, hazardous waste, and soil and fill recycling business activities and operations under the registered and licensed name of: Miller Environmental Group, Inc., including, but not limited to, lettering of all registered equipment, billing and invoices, insurance, and all state and federal identification numbers and registrations.

Continued Obligation to Comply - Licensee has a continuing obligation to comply with all NJDEP rules and regulations.

Obtain Required Approvals Prior to Commencing Solid Waste, Hazardous Waste or Soil and Fill Recycling Operations - Prior to commencing solid waste, hazardous waste, or soil and fill recycling operations, the Licensee must obtain all required permits, licenses, and/or approvals from the Department, or other state, county, or federal agencies as applicable.

Key Employee Disclosures – A Personal History Disclosure (PHD) must be filed within 30 days of hire for any and all key employees; that is, any supervisors, or any individuals empowered by the Licensee to make discretionary decisions with respect to waste operations of the company, or any family member involved in Licensee’s business, consultant, or sales persons. Licensee must file a PHD for these individuals regardless of whether they are employees of Licensee or independent contractors. N.J.S.A. 13:1E-127(f).

Comply with Applicable Federal and State Reporting Requirements - The Licensee is required to comply with all applicable federal and state reporting requirements, including but not limited to the Motor Vehicle Commission, Division of Taxation, and the Department of Labor.

Prohibition of Sale of License - Pursuant to N.J.S.A. 13:1E-133: If, at any point subsequent to issuance of this license, Licensee has no solid waste equipment registered with NJDEP or has no customers: the owners are prohibited from effecting any transaction which results in a change in majority ownership of the company, until NJDEP has reviewed disclosure statements from the proposed new owners and approved their participation in the New Jersey solid waste industry in accordance with N.J.S.A. 13:1E-126 to 135.

Compliance Assistance Workshop – All new key employees (any supervisors, any individuals empowered by Miller Environmental Group, Inc. to make discretionary decisions with respect to the waste or soil and fill recycling operations of the company, any family member, any consultant, or any sales persons) must attend NJDEP’s Compliance Assistance Workshop within 90 days of the hire date. Please email kathleen.gage@dep.nj.gov or loretta.pregartner@dep.nj.gov for further information.

CONDITIONS OF A-901 LICENSE FOR MILLER ENVIRONMENTAL GROUP, INC. (Page 2-of-2)

Solid Waste Transporter and Brokers – The Licensee is required to obtain a Certificate of Public Convenience and Necessity (CPCN) prior to commencing solid waste business operations. Questions regarding the CPCN should be directed to (609) 984-4250 or swutility@dep.nj.gov.

Waste Transporter – The Licensee is required to register and obtain decals for all transportation equipment with NJDEP's Vehicle Registration Unit prior to commencing operations. Questions regarding registration should be directed to (609) 292-7081 or lru@dep.nj.gov.

Lessor Disclosure Requirement - Licensee shall provide disclosure statements from lessors when required by N.J.A.C. 7:26-16.6(i), (j) and (k).

Brokers Must Only Engage the Services of A-901 Licensed Transporters - The Licensee must only engage the solid or hazardous transportation services of A-901 licensed entities. All transporters must comply with state and federal transportation requirements, and have current decals affixed to their equipment. A transporter's licensure status can be verified by using the DataMiner link found at: [https://njems.nj.gov/DataMiner/Search/SearchByCategory?isExternal=y&getCategory=y&catName=Vehicle+Registration+\(2009+Forward\)](https://njems.nj.gov/DataMiner/Search/SearchByCategory?isExternal=y&getCategory=y&catName=Vehicle+Registration+(2009+Forward))

Transporters Must Only Accept Work from a Licensed Broker - The Licensee must ensure that a broker is licensed before accepting a waste transportation or soil and fill recycling project from that broker. A broker's licensure status can be verified by using the DataMiner link found at: [https://njems.nj.gov/DataMiner/Search/SearchByCategory?isExternal=y&getCategory=y&catName=Vehicle+Registration+\(2009+Forward\)](https://njems.nj.gov/DataMiner/Search/SearchByCategory?isExternal=y&getCategory=y&catName=Vehicle+Registration+(2009+Forward))

Engaging in Hazardous Waste Transportation - Hazardous Waste is specifically identified and regulated by the United States Environmental Protection Agency (USEPA) by 40 CFR, Part 262 and incorporated by reference into the regulations of NJDEP. Therefore, the Licensee must comply with all governing state and federal laws applicable to hazardous waste transportation in New Jersey prior to the transportation of hazardous waste and provide proof to the Department at the time of filing your registration statement with NJDEP's Vehicle Registration Unit (609-292-7081) to obtain decals. Specifically, but not limited to: **1.** Obtain a USEPA Transporter Registration Number; **2.** Proof of compliance with the minimum financial responsibility requirements covering public liabilities, property damage and environmental restoration set out at 49 C.F.R. Part 387 in a form approved by the Department; MCS-90; **3.** Proof of Hazmat Training conforming to 49 CFR 172.700 to 172.704; **4.** Proper registration with the U.S. Department of Transportation (USDOT) for any applicable transportation activities; **5.** Proof of current registration with the Pipeline Hazardous Material Safety Administration to transport hazardous material; **6.** If applicable, satisfactory completion of NJ State Police - New Entrant Program, or are in good standing with NJ State Police Motor Vehicle Enforcement. Failure to comply with these conditions may result in formal enforcement actions or denial of NJDEP Transporter Registration Statement and decals. The licensee is also required to maintain good standing with the New Jersey Division of Taxation. Failure to comply with these requirements shall constitute grounds for immediate revocation of this A-901 license.

Compliance with FMCSA and USDOT Requirements – This approval authorizes Licensee to transport waste within the State of New Jersey only. Licensee must register with the Federal Motor Carrier Safety Administration (FMCSA) and obtain a United States Department of Transportation (USDOT) number before using commercial vehicles weighing more than 10,001 pounds, in accordance with federal motor carrier regulations (49 C.F.R. 390.1 et seq.) and state motor carrier regulations (N.J.A.C. 13:60-1.1 et seq.). Licensee is responsible for reporting information consistently to USDOT and NJDEP; any material discrepancy may result in revocation of license.

**NJDEP - CERTIFICATE OF
PUBLIC CONVENIENCE AND NECESSITY
(CPCN)**

**ANNUAL UTILITY REPORT
FOR SOLID WASTE
COLLECTORS/TRANSPORTERS
AND BROKERS**

CALENDAR YEAR 2021

DUE JUNE 1, 2022

**Note: This Report has been changed substantially since last year.
This Utility Report is not the Annual A-901 Update submitted to the
Attorney General's Office!**

What you need to know about the:

2021 SOLID WASTE ANNUAL UTILITY REPORT:

The 2021 Annual Utility Report has been divided into separate parts: Section A for Collector/Transporter Operations and Section B for Broker Operations.

Your 2021 Solid Waste Annual Utility Report (Annual Report) is due no later than **JUNE 1, 2022**

You are **required** to submit this report even if there was **no activity** during calendar year 2021 **OR** if you discontinued service during calendar year 2021.

If you have discontinued service during calendar year 2021 you are required to report all revenue generated as of the date of discontinuance.

This report is NOT the annual A-901 update which you are required to submit separately to the Office of the Attorney General.

REVIEW AND ASSESSMENT OF THE ANNUAL REPORT

Your Annual Report will be reviewed for completeness, verified and approved by NJDEP.

An annual fee assessment will be calculated at the rate of $\frac{1}{4}$ of 1% of your reported gross operating revenue with a \$600 minimum fee. The Department of Treasury, Division of Revenue will mail your invoice to you directly. Please promptly pay this fee assessment directly to the Division of Revenue and include the invoice with your payment.

Do Not Send Your Payments to the NJDEP

It is important that you submit payment promptly as NJDEP is required to refer all overdue fees to Collections within 90 days of the date the fee is assessed.

PROMPTLY MAIL BOTH THE INVOICE AND YOUR PAYMENT DIRECTLY TO TREASURY AT THE ADDRESS LISTED BELOW:

New Jersey Department of Treasury
Division of Revenue
PO Box 417
Trenton NJ 08646-0417

**If you have any questions about the 2021 Annual Utility Report please contact the Bureau of Planning & Licensing
Phone: (609) 984-4250
E-mail: swutility@dep.nj.gov**

Important Note: Due to the Public Health Emergency all employees of the Economic Regulation Unit are currently working remotely. E-mail is the preferred and faster method of communication. Phone messages to the above number will be returned in most cases within 24 hours

ELECTRONIC SIGNATURE & DIGITAL NOTARY REQUIRED:

All signatures in this report must be affixed using the electronic signature method within Adobe Acrobat Reader. In addition, a digital notarization is required pursuant to N.J.S.A. 12A:12-11.

Digital Notary Explanation: The State of New Jersey allows an electronic signature of a person authorized to perform notary services for a record that is made under oath. This Annual Report includes an oath to be made by the “Proprietor, Partner, President or other principal officer of the utility.”

FAILURE TO FILE A COMPLETED ANNUAL REPORT:

You must submit a **COMPLETED** Annual Report and pay the appropriate assessment or your company may be subject to any/all of the following:

- A hold placed on your company’s registered decals
- Your company may be subject to penalties
- Your company may have its CPCN **revoked** in accordance with N.J.A.C. 7:26H-5.15(f)1

If you no longer wish to participate in New Jersey’s solid waste industry, please fill out the Notice of Surrender form found at the end of this report and mail as directed.

- **Note: If you surrender you may still be required to pay the annual utility assessment for the previous calendar year.**

2021 ANNUAL UTILITY REPORT CHECKLIST:

- DOWNLOAD THE ANNUAL REPORT AND INSTRUCTIONS FOR COMPLETING THE REPORT AT: <https://www.state.nj.us/dep/dshw/swpl/cpcn.html>
- This report must be downloaded to your computer and completed using the fillable PDF file. Paper copies of the annual report will no longer be accepted.
- This report must be completed and returned signed and notarized even if there was no solid waste activity in calendar year 2021.
- Type your **CPCN SW number** (4-digits, beginning with 0, 1, 2 or 3) at the upper right-hand corner of Page 2. The SW number will automatically be entered on each subsequent page.
- File this report in the solid waste utility's certificate name *exactly* as shown on the CPCN.
- COMPLETE EVERY QUESTION. Indicate "N/A" for all questions that are not applicable to your company and its operations.
- SIGN and NOTARIZE this Annual Report as per the instructions manual (Section 2E - page 4).
- Keep a copy of this Annual Report for your records pursuant to N.J.A.C. 7:26H-1.20.
- Submit a Customer List (if applicable – see page 11 for instructions for collectors/transporters, and page 23 for instructions for brokers). Customer Lists for companies that are Collectors/Transporters and Brokers must be submitted on separate pages that may be attached using the **Attach Files** button on those pages.
- Accurately report Gross Operating Revenue. Gross Operating Revenues consist of reportable revenues which are derived from customer bills, fees, sales and services for certain types of solid waste (defined on page 5).

PLEASE E-MAIL COMPLETED, SIGNED AND NOTARIZED ANNUAL UTILITY
REPORT TO swutility@dep.nj.gov:

GROSS OPERATING REVENUE **REPORTABLE AND NON-REPORTABLE REVENUE**

The Gross Operating Revenue generated from the collection or brokering of solid waste in New Jersey is required to be reported in the Collector/Transporter and Broker Utilities Annual Report in accordance with **N.J.S.A. 48:2-60**:

Reportable Waste includes revenue derived from the collection/transportation, brokering, and/or disposal of the following solid waste types:

Waste Type ID 10, 12, 13, 13C, 23, 25, 27, 27A and 27I

(See next page for detailed descriptions of Waste Types)

- That is **generated in NJ** and directly transported to a disposal facility **in or out of NJ**.

- That is **generated in NJ** and transported to a transfer station, landfill, incinerator, or rail carrier in NJ.

- That is residual waste (waste remaining after recyclable material has been removed) from a transfer station/material recovery facility and directly transported to a disposal facility in or out of NJ, or transported to a rail carrier in NJ.

- Important Note: If you have an A-901 you cannot claim “self-generated” waste. Self-generators are exempt from holding an A-901 license and must be registered as such with the NJDEP Transportation Oversight Unit. Solid waste that is considered “self-generated” as in demolition and construction **IS** considered reportable waste for all companies that hold a CPCN.

NON-REPORTABLE GROSS OPERATING REVENUE:

- Waste not generated in NJ
- ID 72 Bulk liquid and semi-liquids
- ID 73 Septic tank clean-out wastes
- ID 74 Liquid sewage sludge
- Grease Trap Waste disposed at sewage treatment plant
- Waste collected from a NJ transfer station or rail carrier and directly transported out of NJ for disposal
- Recyclable material hauled to a recycling facility
- Hazardous Waste
- Medical Waste

NEW JERSEY ADMINISTRATIVE CODE N.J.A.C. 7:26-2:13

(g) Waste identification and definition of solids includes the following:

1. Solid wastes; waste ID number and definitions:

- i. **10 Municipal** (household, commercial and institutional): Waste originating in the community consisting of household waste from private residences, commercial waste which originates in wholesale, retail or service establishments, such as, restaurants, stores, markets, theatres, hotels and warehouses, and institutional waste material originated in schools, hospitals, research institutions and public buildings.
- ii. **12 Dry sewage sludge:** Sludge from a sewage treatment plant which has been digested and dewatered and does not require liquid handling equipment.
- iii. **13 Bulky waste:** Large items of waste material, such as appliances and furniture. Discarded automobiles, trucks and trailers and large vehicle parts, and tires are included under this category.
- iv. **13C Construction and demolition waste:** Waste building material and rubble resulting from construction, remodeling, repair, and demolition operations on houses, commercial buildings, pavements and other structures. The following materials may be found in construction and demolition waste: treated and untreated wood scrap; tree parts, tree stumps and brush; concrete, asphalt, bricks, blocks and other masonry; plaster and wallboard; roofing materials; corrugated cardboard and miscellaneous paper; ferrous and non-ferrous metal; non-asbestos building insulation; plastic scrap; dirt; carpets and padding; glass (window and door); and other miscellaneous materials; but shall not include other solid waste types.
- v. **23 Vegetative waste:** Waste materials from farms, plant nurseries and greenhouses that are produced from the raising of plants. This waste includes such crop residues as plant stalks, hulls, leaves and tree wastes processed through a wood chipper. Also included are non-crop residues such as leaves, grass clippings, tree parts, shrubbery and garden wastes.
- vi. **25 Animal and food processing wastes:** Processing waste materials generated in canneries, slaughterhouses, packing plants or similar industries, including animal manure when intended for disposal and not reuse. Also included are dead animals. Animal manure, when intended for reuse or composting, is to be managed in accordance with the criteria and standards developed by the Department of Agriculture as set forth at N.J.S.A. 4:9-38.
- vii. **27 Dry industrial waste:** Waste materials resulting from manufacturing, industrial and research and development processes and operations, and which are not hazardous in accordance with the standards and procedures set forth at 7:26G. Also included are nonhazardous oil spill cleanup waste, dry nonhazardous pesticides, dry nonhazardous chemical waste, and residue from the operations of a scrap metal shredding facility.
- viii. **27A** Waste material consisting of asbestos or asbestos containing waste.
- ix. **27I** Waste material consisting of incinerator ash or ash containing waste.

(h) Waste identification and definition of liquids include the following:

1. Liquid wastes; waste ID number and definitions:

- i. **72 Bulk liquid and semiliquids:** Liquid or a mixture consisting of solid matter suspended in a liquid media which is contained within, or is discharged from, any one vessel, tank or other container which has the capacity of 20 gallons or more. Not included in this waste classification are septic tank clean-out wastes and liquid sewage sludge.
- ii. **73 Septic tank clean-out wastes:** Pumpings from septic tanks and cesspools. Not included are wastes from a sewage treatment plant.
- iii. **74 Liquid sewage sludge:** Liquid residue from a sewage treatment plant consisting of sewage solids combined with water and dissolved materials.

2021 CPCN ANNUAL REPORT FOR
COLLECTORS/TRANSPORTERS AND BROKERS

FILL IN ALL INFORMATION BELOW:

CHECK ALL THAT APPLY:

- COLLECTOR/TRANSPORTER
 BROKER

1. INFORMATION

***Required: Working Contact Information**

*OFFICIAL COMPANY NAME: _____
(This is the name registered with the Division of Commercial Recordings)

*EMAIL: _____

*STREET ADDRESS: _____

*CITY, STATE, ZIP _____

*FEIN (or LAST 4# OF SS# FOR SOLE PROPRIETOR): _____

*OFFICE TELEPHONE: _____

*CELL PHONE: _____ FAX NUMBER: _____

WEBSITE: _____

*BILLING/MAILING ADDRESS: CHECK HERE IF SAME AS ABOVE:

STREET ADDRESS: _____

CITY, STATE, ZIP _____

2. LIST OFFICERS AND EQUITY HOLDERS:

*Name	*Title	*Equity
Name	Title	Equity
Name	Title	Equity

3. NAME OF REGISTERED AGENT(Out of State Companies) : _____

STREET ADDRESS: _____

CITY, STATE, ZIP _____

TELEPHONE: _____

CELL PHONE: _____ FAX NUMBER: _____

4. **VEHICLE INFORMATION FOR YOUR SOLID WASTE TRANSPORTATION EQUIPMENT:**

Provide the **number** of solid waste vehicles that require NJDEP issued decals owned and/or operated (include leased vehicles) by the CPCN holder as of **December 31, 2021**.

- _____ NO EQUIPMENT
- _____ CABS (does not hold waste)
- _____ CONTAINERS (roll off)
- _____ SINGLE UNIT VEHICLES (eg. pickup trucks, vans, dump truck)
- _____ TRAILERS

5. **VEHICLE LOCATION:** Provide the address of the location of where your solid waste vehicles are stored.

Address:

City, State, Zip:

6. **DID YOUR COMPANY USE A SOLID WASTE BROKER SERVICE?** NO YES:
If YES please see Page 16.

7. **DOES YOUR COMPANY OR ITS PRINCIPALS HAVE ANY CURRENT OR OUTSTANDING JUDGMENTS AND/OR LIENS?** NO YES: You must provide the information below for EACH (label and attach a separate page if necessary):

Name: _____

Address: _____

City, State, Zip: _____

Provide a brief description: _____

Check here if additional pages are attached

8. **HAS ANY EMPLOYEE, ASSOCIATE, OFFICER, OR EQUITY HOLDER HAD THEIR SOLID WASTE OPERATING AUTHORITY REVOKED OR SUSPENDED IN NEW JERSEY OR NEW YORK?** NO YES: You must provide the name and details concerning this revocation or suspension (label and attach a separate page if necessary):

Name: _____

Address: _____

City, State, Zip: _____

State(s) the revocation or suspension occurred: _____

Provide a brief description:

 Check here if additional pages are attached

9. **DID YOUR COMPANY SUBCONTRACT SOLID WASTE SERVICES TO ANOTHER SOLID WASTE COLLECTOR/TRANSPORTER IN 2021?** NO YES:

You must provide the information below for EACH subcontract (label and attach a separate page if necessary):

“Subcontractor” is any person who engages in the storage, collection, processing, transfer, treatment, or disposal of solid waste *through the use, control or possession of any solid waste vehicle*, pursuant to an oral or written agreement entered into with a prime contractor.

Subcontractor (Solid Waste Hauler Used)	Gross Revenue Received from Customer *	Total Amount Paid to Subcontractor (Hauler)

*Please note the amounts entered in this column will be automatically added to your gross revenue on page 21.

10. **DID YOUR COMPANY ACCEPT AN OFFER TO SUBCONTRACT SOLID WASTE SERVICES FOR ANOTHER SOLID WASTE COLLECTOR/TRANSPORTER IN 2021?**

NO YES:

You must provide the information below for EACH subcontracting job that your company performed in 2021 (label and attach a separate page if necessary):

Prime Contractor (Solid Waste Hauler that Hired Your Company)	County of Subcontracting Job	Total Amount Received from Prime Contractor **

**Please note the amounts entered in this column will NOT link to your gross revenue and must be reported accordingly on the disposal page.

Attachment 2 – Photo Log

PHOTO LOG

March 2023 Drum Removal and Disposal Activities
"S. Yaffa & Sons, Inc."
Blocks 324 and 331
Camden, New Jersey 08105



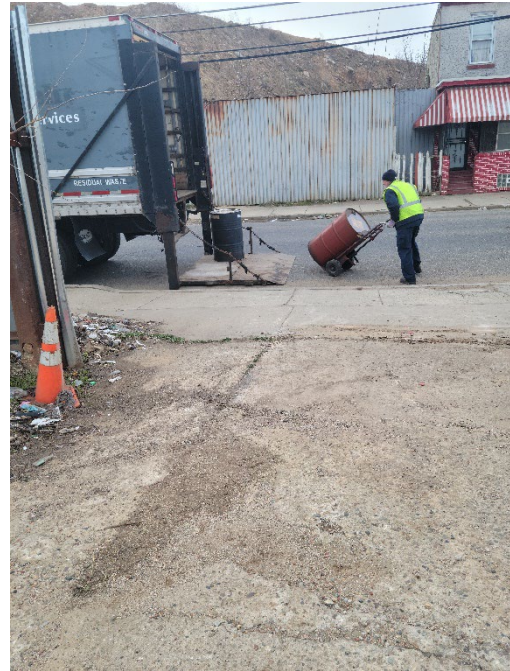
Drums located on Block 324 (DRUM-01 through DRUM-12)



Drums located on Block 331 (DRUM-13 through DRUM-15)



Removal of drums from Block 324



Loading drums from Block 324 onto material transport truck



Removal of drums from storage area on Block 331



Removal of drums from Block 331



Surficial staining on concrete around DRUM-01 on Block 324



*Stained surficial soil around DRUM-01
scraped off concrete and removed*



*Stained surficial soil around DRUM-01
contained and area secured*

Attachment 3 – Waste Profiles and Final Bills of
Lading (Certification of Disposal)



108 East Lake Road
Woodstown, NJ 08098

Phone: (856) 769-9022
Fax: (856) 769-8740
EPA ID: NJD011881174

Profile No:
(For Internal Use Only)

PROFILE SHEET

A. GENERAL INFORMATION EPA ID# _____ GENERATOR NAME _____ SITE ADDRESS _____ GENERATOR CONTACT _____ GENERATOR PHONE # _____	BILLING INFORMATION COMPANY _____ ADDRESS _____ CONTACT _____ PHONE # _____ EMAIL _____
--	---

B. NAME OF WASTE: _____
PROCESS GENERATING WASTE: _____

C. PHYSICAL CHARACTERISTICS (at 70°F)
 COLOR / PHYSICAL DESCRIPTION: _____
 STRONG INCIDENTAL ODOR PRESENT: ___ YES ___ NO
 SPECIFIC GRAVITY: _____
 FLASH POINT < 74°F 74-100°F 101-140°F 141-200°F Flash Point >200°F
 No Flash Point
 Open cup Closed cup Exact Flash Point _____
 pH: ___ < 2 ___ 2.01-5 ___ 5.01-9 ___ 9.01-12.5 ___ > 12.5 ___ actual
 PCB: ___ < 2 ppm ___ < 50 ppm ___ > 50 ppm ___ actual
 HALOGENS: ___ < 1000 ppm ___ 1000-4000 ppm ___ > 4000 ppm

Liquid / Solid / Sludge	
% Liquid	_____
% Suspended Solids	_____
% Sludge	_____
% Solid	_____
Dumpable?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pumpable?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pourable?	<input type="checkbox"/> Yes <input type="checkbox"/> No

METALS Results based on: Generator Knowledge Analysis Results expressed in: TCLP (mg/l) Total (mg/kg)

Arsenic <input type="checkbox"/> <5.0 _____	Selenium <input type="checkbox"/> <1.0 _____	REACTIVITY (PPM) <input type="checkbox"/> Yes <input type="checkbox"/> No Total Cyanides _____ Amenable Cyanides _____ Reactive Sulfides _____ Fuel Info: BTU / lb. _____
Barium <input type="checkbox"/> <100 _____	Silver <input type="checkbox"/> <5 _____	
Cadmium <input type="checkbox"/> <1 _____	Copper _____	
Chromium <input type="checkbox"/> <5 _____	Nickel _____	
Lead <input type="checkbox"/> <5 _____	Zinc _____	
Mercury <input type="checkbox"/> <0.2 _____	Other _____	

D. CHEMICAL COMPOSITION
 ATTACHMENTS: MSDS attached Supplemental Analysis Additional Information
 LDR Attachment

Chemical Composition, Percent	Minimum	Maximum

- FOR USED OILS THAT CONTAIN > 1000 ppm HALOGENS, CAN THE PRESUMPTION OF HAZARDOUS WASTE BE REBUTTED?
 Yes No N/A
 IF YES, IS DOCUMENTATION ATTACHED? Yes No
- IS THIS A NON-HAZARDOUS MATERIAL THAT FALLS UNDER THE NJAC USED OIL/SOLID WASTE REGULATIONS? Yes No

E. REGULATORY INFORMATION
 USEPA Haz Waste? Yes No
 USEPA Haz Codes: _____
 DOT Haz Material? Yes No
 Proper Shipping Name: _____
 Haz Class: _____ UN/NA#: _____ PG: _____
 RQ: _____ ERG#: _____

F. SHIPPING INFORMATION
 Shipping Method:
 Bulk Liquid-Trailer Pallet(s) Drum (Size) _____
 Bulk Solid-Dump Tote(s) _____
 Bulk Solid-Roll Off Cubic Yard Box(s) _____
 Other (Size) _____
 Anticipated Volume: _____ Per _____
 TRANSPORTER: _____

I HEREBY CERTIFY THAT ALL THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS TRUE, ACCURATE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND THAT ALL RELEVANT INFORMATION REGARDING KNOWN OR SUSPECTED HAZARDS IN THE POSSESSION OF THE GENERATOR HAS BEEN DISCLOSED. ANY MATERIAL THAT DOES NOT CONFORM TO THE ABOVE INFORMATION MAY RESULT IN REJECTION OR ADDITIONAL SURCHARGES. GENERATOR AGREES TO REIMBURSE **Miller Environmental Group, Inc** FOR ALL COSTS INCURRED RESULTING FROM THE HANDLING, PACKAGING, CLEAN UP, TRANSPORTATION, DAMAGE TO EQUIPMENT AND COST ASSOCIATED WITH LOST TIME INCURRED BY MONARCH ENVIRONMENTAL RECYCLING DURING THE RECEIPT, HANDLING, TEMPORARY STORAGE AND RETURN OF SUCH NONCONFORMING WASTE TO THE POINT OF ORIGIN OR TO SUCH OTHER LOCATION DESIGNATED BY THE GENERATOR.

_____ as agent for Camden
 Redevelopment Agency
 Authorized Signature Title Approved By
 Name (Print) Date Date
 Rev 8/18



Cycle Chem, Inc.

217 South 1st St.
Elizabeth, NJ 07206
Phone: (908) 355-5800
Fax: (908) 355-0562

550 Industrial Dr.
Lewisberry, PA 17339
Phone: (717) 938-4700
Fax: (717) 938-3301

General Chemical Corporation

133-138 Leland St., Framingham, MA 01 701
Phone: (508) 872-5000 Fax: (508) 875-5271

Material Profile Sheet

Gencode/Gen #: Stream:(if applicable)

Process/Product Code-

A. GENERATOR INFORMATION

EPA ID # NJN008024234

GENERATOR NAME Camden Redevelopment Agency

MAILING ADDRESS 520 Market Street #1300

Camden, NJ 08102

GENERATOR CONTACT BRS Inc, Alicia Flammia

GENERATOR PHONE # 856-964-6456

GENERATOR FAX

SITE ADDRESS 619 Chestnut Street

Camden, NJ 08103

BILLING COMPANY Miller Environmental Group

BILLING ADDRESS 538 Edwards Ave.

Calverton, NY 11933

BILLING CONTACT AP@millerenv.com

BILLING PHONE# 631-369-4900 FAX

NAME OF WASTE:

PCB contaminated oily water

PROCESS GENERATING WASTE: removal of drums from site clean up

B. PHYSICAL CHARACTERISTICS OF WASTE (AT 70- F)

Color / Odor / brown
Physical Description oil

Wastewater: Wastewater Non-wastewater

Specific Gravity: 1.0

Physical State:

- Single Phase Solid Gas/Aerosol
 Bi-Layered Liquid Lab Pack
 Multi-Layered Semi-Solid
 Powder Sludge

Flash Point:

- Flashpoint <74 F Flashpoint 140-200 F No Flashpoint
 Flashpoint 74-139 F Flashpoint >200 F Exact Flashpoint
 Open cup Closed cup

Ignitable Solid?

- Yes No

pH: <2.0 2.01-5.0 5.01-9.0 9.01-12.49 >12.5 Exact pH

Liquid/Solid/Sludge

% Liquid 98

% Suspended Solids

% Sludge

% Solid 2

Dumpable? Yes No

Pumpable? Yes No

Pourable? Yes No

D. REGULATORY INFORMATION

Is it USEPA Haz waste? Yes No

USEPA Haz Codes:

EPA Sub Categories:

Is it STATE waste? Yes No

STATE Haz Codes:

DOT Hazardous Material? Yes No

Proper Shipping Name:

Hazard Class: _____ UN/NA #: _____ P. G. _____

RQ: _____ ERG#: _____

C. CHEMICAL COMPOSITION

ATTACHMENTS: MSDS attached Supplemental Analysis Additional Information LDR Attachment

Chemical Composition	Percent	Minimum	Maximum
<u>oil</u>			<u>50</u>
<u>water</u>			<u>48</u>
<u>solids</u>			<u>2</u>
<u>TSCA PCB. bdm</u>			<u>22.1</u>

E. SHIPPING INFORMATION

Shipment Method

- Bulk Liquid Dump Trailer Drum (Size): 55 steel
 Bulk Solid - Dump Pallett(s)
 Bulk Solid - Roll Off Cubic Yard Box(s) Other (Size): _____

Anticipated Volume: one Per o/t

Quantity: _____ Price: _____ / Unit: _____

F. SPECIAL HANDLING CONSIDERATIONS

- Radioactive PA RW SQG No Land Filling
 Etiologic/Medical Waste DRMS/DRMO Waste Incinerate Only
 Fuming CERCLA Waste Recycle Only
 Phenolics Asbestos Other: (fill in below)

G. TRANSPORTER ARRANGEMENTS

- CCI Provides Transportation Other:
 Customer Delivers to CCI
 Customer Delivers to End Facility via CCI

H. OTHER HAZARDOUS CHARACTERISTICS

- RCRA REACTIVE ETIOLOGICAL EXPLOSIVE/SHOCK SENSITIVE
 WATER REACTIVE TSCA REG NONE OF THE ABOVE
 RADIOACTIVE OXIDIZING MATL
 SUBJECT TO SUBPART FF BENZENE REG PYROPHORIC

Indicate if waste contains any of the following:

	Non-Reg	or Less-than	or Actual
PCB'S	<input type="checkbox"/>	<input checked="" type="checkbox"/> 50 PPM	<u>22.1</u>
Cyanides	<input checked="" type="checkbox"/>	<input type="checkbox"/> 250 PPM	
Phenolics	<input checked="" type="checkbox"/>	<input type="checkbox"/> 50 PPM	
Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> 500 PPM	
Vocs	<input checked="" type="checkbox"/>	<input type="checkbox"/> 500 PPM	
Chlorides	<input checked="" type="checkbox"/>	<input type="checkbox"/> 1000 PPM	

1. Is this waste characteristically hazardous for metals or organics (EPA Waste Codes D004 through D043)? Yes No
If YES, please list the constituents and concentrations in section C.

2. Does this waste contain underlying hazardous constituents as defined in 40 CFR 268 Part 2, Section I at concentrations exceeding the UTS treatment standards? Yes No
If YES, please list the constituents and concentrations in section C.

GENERATOR CERTIFICATION: I hereby certify that all information submitted in this and all other attached documents is complete, contains true and accurate descriptions and is representative of the waste material, and that all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. If CCI/GCC discovers, after having taken the delivery of the waste, that any waste does not conform to the identification or descriptions contained in this NIPS then CCI/GCC shall provide notice to Generator and coordinate the return, if applicable, of the non conforming waste to the point of origin as set forth in the manifest or to such other locations designated in writing by the Generator. Generator agrees to reimburse CCI/GCC for all handling, packaging, cleanup and transportation costs or charges, damage to equipment and costs associated with lost time incurred by CCI/GCC during the receipt, handling, temporary storage and return of such non conforming waste to its point of origin or to such other location designated by the Generator. I hereby authorize CCI/GCC to amend and/or correct any information on the MPS with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue any approval.

as agent for Camden Redevelopment Agency

Authorized Signature [Signature] Title Sr Scientist, Montrose Environmental Date 3/8/2023

CCI/GCC APPROVAL

Tech Initials _____ Date _____

Management Initials _____ Date _____

RW / Form Code _____

Report of Analysis

3.3
3

Client Sample ID: DRUM-03		Date Sampled: 12/01/22
Lab Sample ID: JD56558-3		Date Received: 12/02/22
Matrix: SO - Oil		Percent Solids: n/a
Method: SW846 8082A SW846 3580A		
Project: Yaffa Drum Characterization		

	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1 ^a	5G126182.D	10	12/08/22 18:36	MLC	12/07/22 12:24	OP43508	G5G3190
Run #2							

	Initial Weight	Final Volume
Run #1	1.0 g	10.0 ml
Run #2		

PCB List

CAS No.	Compound	Result	RL	MDL	Units	Q
12674-11-2	Aroclor 1016	ND	5.0	2.3	mg/kg	
11104-28-2	Aroclor 1221	ND	5.0	3.1	mg/kg	
11141-16-5	Aroclor 1232	ND	5.0	3.2	mg/kg	
53469-21-9	Aroclor 1242	ND	5.0	2.1	mg/kg	
12672-29-6	Aroclor 1248	ND	5.0	4.5	mg/kg	
11097-69-1	Aroclor 1254	ND	5.0	2.7	mg/kg	
11096-82-5	Aroclor 1260	ND	5.0	2.1	mg/kg	
11100-14-4	Aroclor 1268	ND	5.0	2.1	mg/kg	
37324-23-5	Aroclor 1262	22.1	5.0	3.3	mg/kg	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
877-09-8	Tetrachloro-m-xylene	350% ^b		10-163%
877-09-8	Tetrachloro-m-xylene	141%		10-163%
2051-24-3	Decachlorobiphenyl	396% ^b		10-215%
2051-24-3	Decachlorobiphenyl	355% ^b		10-215%

- (a) Dilution required due to viscosity of the extract matrix.
- (b) Outside control limits due to matrix interference.

ND = Not detected	MDL = Method Detection Limit	J = Indicates an estimated value
RL = Reporting Limit		B = Indicates analyte found in associated method blank
E = Indicates value exceeds calibration range		N = Indicates presumptive evidence of a compound

CycleChem - TSCA PCB Profile Addendum



Profile#:

Site Information

Generator Name: _____

Site Address: _____

Site EPA ID#*: _____

*As per the requirements of 40CFR 761.205, individuals who generate, transport or store PCB wastes must notify the EPA of PCB activities using Form 7710-53, and obtain an EPA ID#. Generators exempt from notification under 40CFR 761.205(c)(1) shall utilize the generic identification # "40CFRPart761", or an existing EPA Identification # issued to them under RCRA.

Waste Information

Waste Description: _____

Shipment Type: Bulk (Tanker, Roll-off, etc.) Containers (Drums, Pails, etc.) Transformers

Waste Type: _____ (See definitions at bottom of page)

If PCB Article(s), indicate whether Large Low Voltage Capacitors, or Large High Voltage Capacitors are present.

Please provide the following information for each item or container of waste

Unique ID #(Container #, Serial #, etc.)	Out of Service (Storage) Date**	Weight (in Kg)

Attach additional sheets if necessary

** Out of Service (Storage) Date: The date the equipment was taken off-line or material became a waste

Waste Types:

PCB Article: Any manufactured article, other than a container, that contains PCBs and whose surface has come in contact with the PCBs. Examples include transformers, capacitors, etc. with PCBs \geq 50 ppm

PCB Container: Any package, including drums, pails, etc., whose surface has been in direct contact with PCBs. (i.e. spill debris drum)

PCB Article Container: A container, such as a drum, used to contain PCB Articles and whose surface has not been in direct contact with PCBs

Large Capacitor Definitions:

Large Low Voltage Capacitor: A capacitor that contains 1.36 kg (3lbs) or more of dielectric fluid and which operates below 2000 volts.

Large High Voltage Capacitor: A capacitor that contains 1.36 kg (3 lbs) or more of dielectric fluid and which operates at 2000 volts or above.

Miller Env. Group

164 Route 45
Mannington, NJ 08079

Site Job Site - Camden Redevelopment Ag
619 Chestnut St

BOL: 453036

Camden NJ 08103

NY 28230706

Transporter 1 Company Name Miller Environmental Group	US EPA ID Number NYD986908085	Transporter's Phone 856-769-9022
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Designated Facility name and Site Address Miller Environmental Recycling 108 East Lake Rd Woodstown, NJ 08098	US EPA ID Number NJ0011881174	Facility's Phone 856-769-9022
--	----------------------------------	----------------------------------

US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packaging Group)	Containers		Total	Unit
	No.	Type	Quantity	Wt/Vol
<i>Petroleum Mixture Liquid/Solid Non RCRA / DOT Regulated</i>	<i>14</i>	CM	<i>1,500</i>	P / Y
		DM		P
		TT		G

Additional Descriptions for Materials Listed Above

ERG# _____

24-Hr Emergency Phone: (800) 394-8606

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and are non-hazardous by US EPA and applicable state regulations.

Printed/Typed Name <i>Tom Cornelius on behalf of city of Camden</i>	Signature <i>[Signature]</i>	Month / Day / Year <i>03, 15, 2023</i>
--	---------------------------------	---

Transporter 1 Acknowledgement of Receipt of Materials		Month / Day / Year
Printed/Typed Name <i>Ben DuBois</i>	Signature <i>[Signature]</i>	<i>03, 15, 2023</i>

Facility Owner or Operator: Certification of Receipt of Above Listed Materials		Month / Day / Year
Printed/Typed Name <i>Karen Kechet</i>	Signature <i>[Signature]</i>	<i>03, 15, 23</i>

LOADING INFORMATION

Start Time: _____
Arrival Time: *8:18 A*
Depart Time: *10:10 A*
Finish Time: _____

Bill To Montrose Environmental

Special instructions

PO # _____

Onsite *Ban* to pick up (15) drums - (3) empty, (11)-water

D 150580

Please print or type

BILL OF LADING		Generator EPA ID # N/A	1. Document No. D36258	2. Page 1 of 1
3. Generator's Name and Mailing Address CAMDEN REDEVELOPMENT AGENCY 619 CHESTNUT STREET CAMDEN, NJ 08103			Site Address	
4. Generator's Phone ()				
5. Transporter 1 Company Name MILLER ENVIRONMENTAL GROUP, INC		6. EPA ID # NYD986908085	A. State Transporter's ID 3126110	B. Transporter 1 Phone 800-394-8606
7. Transporter 2 Company Name		8. EPA ID #	C. State Transporter's ID	D. Transporter 2 Phone
9. Designated Facility Name and Site Address CYCLE CHEM, INC 217 SOUTH FIRST ST. ELIZABETH, NJ 07206		10. EPA ID # NJD002200046	E. State Facility's ID	
HM		F. Facility's Phone 908-355-5800		
GENERATOR	11. Shipping Name	12. Containers No.	13. Total Quantity	14. Unit Wt./Vol.
	X a. UN2315, Polychlorinated biphenyls, liquid, 9, II,	1	136 300	Kg
	b.			
	c.			
	d.			
G. Additional Descriptions for Materials Listed Above Document # D36258 Job #: NJ28230706 PO #: 24-hour Emergency Number: 800-394-8606 1) 229832-PCBT1 ERG#171 1 X 55GAL				
15. Special Handling Instructions and Additional Information				
16. GENERATOR'S CERTIFICATION: I hereby certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. The materials described on this document are not subject to federal uniform hazardous waste manifest requirements.				
Printed/Typed Name <i>Tim Connelley on Behalf of the City of Camden</i>			Date Month Day Year 3 15 23	
Signature <i>Tim Connelley</i>				
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials			
	Printed/Typed Name <i>Ben Du Bois</i>		Signature <i>Ben Du Bois</i>	
			Date Month Day Year 3 15 23	
18. Transporter 2 Acknowledgement of Receipt of Materials				Date Month Day Year
Printed/Typed Name				Signature
				Month Day Year
FACILITY	19. Discrepancy Indication Space			
	20. Facility Owner or Operator, Certification of receipt of the materials covered by this bill of lading except as noted in item 19.			
	Printed/Typed Name <i>AG Gibson</i>		Signature <i>AG Gibson</i>	

ad Pender

BILL OF LADING