



OFFICE OF THE MAYOR
CITY OF CAMDEN
NEW JERSEY

DANA L. REDD
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November 16, 2017

United States Environmental Protection Agency
Attn: Ms. Lya Theodoratos
290 Broadway 18th Floor
New York, NY 10007

Re: City of Camden
EPA Brownfields Cleanup Grant Application
Camden Labs Site

Dear Ms. Theodoratos:

Enclosed please find an application for an EPA Brownfields Cleanup Grant for the above-referenced site for the City of Camden.

Pertinent applicant information follows:

- a. Applicant Identification: City of Camden
City Hall, 520 Market Street, 4th Floor
Camden, New Jersey 08102
- b. Funding Requested:
i) Grant Type: Single Site Cleanup
ii) Federal Fund Requested: \$200,000
ii) Contamination: Hazardous Substances
- c. Location: The City of Camden, Camden County, New Jersey
- d. Property Information: Camden Laboratories Site
1667 Davis Street
Camden, New Jersey 08103

- e. Contacts:
- i) Project Director: Mr. James Harveson
City of Camden Redevelopment Agency
City Hall, 520 Market Street, Suite 1300
Camden, New Jersey 08102
jaharves@ci.camden.nj.us
(856) 757-7600
 - ii) Chief Executive: Mayor Dana L. Redd
520 Market Street
City Hall, 4th Floor Camden, NJ 08101
mayor@ci.camden.nj.us
(856) 757-7200
- f. Population:
- i) Population of the City of Camden: 76,904 (2011-2015 American Community Survey)
 - ii) Not Applicable as the applicant is a municipal form of government
 - iii) Statement regarding persistent poverty: Camden County is not a county experiencing "persistent poverty."
- g. Other Factors Checklist: Please see attached.
- h. Letter from the State or Tribal Environmental Authority: Please see attached.

I am excited about the opportunity that this grant will provide to the citizens of the City of Camden and look forward to a favorable response. Thank you for your consideration.

Sincerely,



Dana L. Redd
Mayor

Appendix 3 Cleanup Other Factors Checklist

Name of Applicant: City of Camden

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	15
Applicant* is a recipient of an EPA Brownfields Area-Wide Planning grant.	11

* - The CRA, the redevelopment arm of the City, was the formal recipient of the EPA Mt. Ephraim Area Wide Planning grant.



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SITE REMEDIATION PROGRAM
OFFICE OF BROWNFIELD REUSE
MAIL CODE 401-05K
P.O. BOX 420
TRENTON, NEW JERSEY 08625-0420
[HTTP://WWW.STATE.NJ.US/DEP/SRP](http://www.state.nj.us/dep/srp)

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

November 14, 2017

The Honorable Scott Pruitt, Administrator
US Environmental Protection Agency
401 M Street SW
Washington, DC 20460

RE: City of Camden USEPA Brownfields Site Cleanup Grant Application Camden Laboratories Site,
1667 Davis Street, Camden, NJ

Dear Administrator Pruitt:

On behalf of the New Jersey Department of Environmental Protection, it is my pleasure to endorse the City of Camden's application to the United States Environmental Protection Agency (USEPA) for a Brownfields Site Cleanup Grant to remediate environmental impacts associated with discharges of hazardous substances at the Camden Laboratories Site at 1667 Davis Street in the City of Camden. The New Jersey Department of Environmental Protection acknowledges that Camden plans to conduct remedial action activities at the Camden Laboratories Site.

The City of Camden has developed an aggressive redevelopment strategy to identify, assess and reuse abandoned brownfield sites. The site identified in the grant application represents a priority brownfield redevelopment opportunity for the City.

Please accept this letter of support for the Camden Cleanup Grant application. Please do not hesitate to contact me if I may be of further assistance. I may be telephoned at (609) 633-8227, or, e-mailed at William.Linder@dep.nj.gov.

Sincerely,

William J. Lindner, Manager
Office of Brownfield Reuse

Cc; Frank McLaughlin, DEP
James Harveson, Camden Redevelopment Agency
Mayor Dana Redd, City of Camden
Kathleen Nolan, BRS, Inc.

**CITY OF CAMDEN, NEW JERSEY
US ENVIRONMENTAL PROTECTION AGENCY
CLEANUP GRANT PROPOSAL
CAMDEN LABORATORIES SITE
November 16, 2017**

1. COMMUNITY NEED

a. Targeted Area & Brownfields

i. Community and Target Area Descriptions:

Camden, New Jersey is located between the Delaware and Cooper Rivers, across from Philadelphia, PA. The early rise of industry centered on the waterfront and transportation including ferries, stage and rail services which linked Camden to New York, agricultural South Jersey, Philadelphia and points west, and the Delaware Bay. During World War II, Camden was home to the largest shipyard in the world. Camden was also the home of RCA Victor, once the world's largest manufacturer of phonographs and innovator of music, radio and color television technologies. Iconic Campbell Soup, one of the first industries to incorporate in the city, is still headquartered here. Similar to so many American manufacturing centers, jobs attracted waves of immigration and the City's diversity and population grew until the 1950s when new technologies and competition took industries elsewhere. Racial tensions and political corruption hollowed out the city at the end of the 20th century and over the past two decades, Camden has captured national headlines as one of the poorest and most violent cities in America.

The target area for cleanup funds is a 3.9 acre site in Census tract 6015, known as the former Camden Laboratories site (Camden Labs). Located in the Mt. Ephraim neighborhood, the Camden Labs site is on the southeast side of the community, near the Cooper River. The Mt. Ephraim neighborhood consists of a local commercial corridor, Mt. Ephraim Avenue, surrounded by diverse residential areas that also contain a variety of institutional uses, such as hospitals, schools and churches. The area also contains many vacant and blighted brownfield sites, owing to commercial and industrial uses historically located in the community. Camden Labs has been identified as a primary brownfield site or "catalyst" site by the recent Mt. Ephraim EPA Area Wide Plan (AWP) due to its size and location in the neighborhood. Its potential as a catalyst site is enhanced by being surrounded by a predominantly residential area and within walking distance of the Ferry Avenue PATCO high speed commuter rail station. More significantly, Camden Labs, a known contaminated brownfield shares the block with the community's Whitman Park.

ii. Demographic Information and Indicators of Need:

Demographic information for Camden and Whitman Park Census Tract 6015 illustrates the vulnerability of this population when compared to national and state statistics. Very striking is the difference in quality of life between Camden City and the surrounding suburban communities of Camden County. In some cases the Whitman Park neighborhood is even more distressed in comparison to the City as a whole. Camden is plagued with an alarming poverty rate of 39.9% many times higher than the national and state averages. In Census Tract 6015, median income is \$17,500 - less than one-third of the national average and only 24% of the state average. Over 80% of the families are multi-generational where the grandparents are responsible for their grandchildren and over 50% of households are single mother/grandmother living below the

poverty line. Whitman Park is 97.7% minority and almost a third speak languages other than English, specifically Spanish. While slightly lower than the entire city, the neighborhood unemployment rate of 15.3% is three times higher than the national rate. Educational attainment in the area, a primary indicator of earning power, is also lacking, as the population without a high school education is over 32% compared to the national average of 13%. Census statistics also give a few insights into the challenges of the physical environment. Less than nine square miles, Camden is highly dense with over 12,000 people per square mile living among 210 known brownfields. Eighty-three percent of their housing stock is over 35 years old, which increases the risk of lead poisoning. In Whitman Park over 21% of that housing stock is vacant, meaning many are living and growing up next to abandoned buildings.

Demographic Information for Camden¹

Demographic Indicators	Census Tract 6015 Whitman Park	Camden City	Camden County	NJ	US
Population	5,789	76,904	511,998	8,904,413	316,515,021
Unemployment Rate	15.30%	19.6%	10.2%	8.8%	5.0%
Individuals Below Poverty	35.2%	39.9%	13.2%	10.8%	15.5%
Minority Population ²	97.7%	95.6%	41.5%	42.8%	37.7%
Median Household Income	\$17,500	\$25,042	\$62,185	\$72,093	\$53,889
Households w individuals < 18	43.4%	43.5%	34.0%	34.1%	32.3%
Per Capita Income	\$13,658	\$13,412	\$30,822	\$36,582	\$28,930
Families Below Poverty	34.4%	36.7%	10.2%	8.2%	11.3%
Families w/female householder, no husband, children < 18 below poverty	51.2%	58.3%	36.6%	33.3%	40.5%
% of Multigenerational families w/ grandparents responsible for grandchildren	80.1%	38.10%	30.5%	25.20%	37.30%
Individuals 65+ Below Poverty	29.0%	29.8%	9.8%	8.0%	9.4%
Households receiving Food Stamp/SNAP benefits in the past 12 months	40.6%	43.2%	12.7%	9.1%	13.2%
Population Lacking High School Level Education	32.4%	32.4%	12.1%	11.4%	13.3%
Language other than English	28.8%	45.7%	20.2%	30.5%	21.0%
Vacancy Rate	21.6%	18.4%	9.6%	10.9%	12.3%
% Occupied Housing with No Vehicles Available	39.70%	34.7%	11.7%	11.7%	9.1%
Housing Burdened (Paying > 30% Gross Income for Rent)	76.5%	64.7%	56.5%	53.8%	51.8%
Population 65+, with disability	31.2%	48.0%	37.9%	33.0%	36.0%
Area in square miles	0.452	8.92	221.26	7,354.22	3,531,905.43
Population density (people/sq.mi.)	12,807.5	8,621.5	2,314.0	1,210.8	89.6
Housing Stock Pre-1960	62.5%	65.8%	42.7%	41.6%	29.2%
Incidents of crime per 100,000 ³	NA	2,566	NA	290	387

¹Data from the 2011-2015 American Community Survey five-year estimates.

²Data represents respondents identifying themselves as a race other than solely white.

³Data from Federal Bureau of Investigation (FBI) 2012 Uniform Crime Reports.

iii. Description of the Brownfields:

Identified in the 2017 Area Wide Plan as one of two catalyst sites with a high potential for spurring redevelopment of the neighborhood, the proposed 3.9 acre site has significant contamination and safety issues to resolve in order to fulfill its promise as a much needed expansion of Whitman Park. From site investigations and limited environmental remediation activities conducted between 1989 and 2009, the site is known to be contaminated with mercury impacted soil and chlorinated solvents in groundwater, remnants from its history as a hospital and medical bio-tech facility. Approximately two-thirds of the site is covered by asphalt-paved parking areas and a vacant compound of institutional buildings of approximately 53,000 square feet slated for demolition in spring of 2018. The vacant structures are in extremely poor condition, known to contain lead based paints and subject to vandalism and large amounts of illegal dumping - literally across Hallowell Lane and Decatur Street from residential neighbors. Originally developed in the early 1920's as the Hospital for Contagious Diseases, in the 1950's, the facility was transformed into the South Jersey Medical Research Foundation Laboratory. The site was purchased by Camden Laboratories, LP, in 1989 and then operated as a series of medical laboratories including "Viro-Med Biosafety" and "Quality Bio-tech" until at least 2007. The site has been vacant since 2008 and the City foreclosed and took ownership of the property in 2017.

Mt. Ephraim contains significant environmental burdens, especially when compared with other parts of Camden County, such as a county incinerator and a county sewage treatment plant whose odors have impacted the targeted area. In addition, 23 brownfield sites were identified in the inventory generated by the 2017 Area Wide Plan, including numerous abandoned dry cleaners and gas stations. In addition to Camden Labs, across the street to the east is the Phil-Mar site (4.1 acres), identified as the second catalyst site for the neighborhood in the AWP process. This site is also abandoned, in extremely poor condition and subject to vandalism, illegal dumping and various other criminal activities. Given their substantial size, together, they represent impediments to the advancement of community revitalization efforts.

b. Welfare, Environmental and Public Health Impacts:

i. Welfare Impacts:

The City's 2015 Master Plan, *FutureCAMDEN*, articulates an environmental goal of "cleaning up and remediating known contaminated sites," as they negatively affect the quality of life for City residents. Residents in the target neighborhood are negatively impacted by a vicious cycle of contaminated, vacant land that contributes to community blight, resulting in high rates of crime and an unwillingness of developers to invest here. The site is a known haven for illicit activities like vandalism, illegal dumping, and drug use. Mt. Ephraim Avenue is a high trafficked area interspersed with abandoned storefronts that has become an open air drug market. According to the FBI, in 2012 the violent crime in Camden was nearly seven times that of the national rate and nearly nine times the state rate (Uniform Crime Reporting Statistics). In May of 2014, the FBI launched Camden's largest drug takedown in over a decade to disrupt drug operations based in the target area. The drug organization had an extensive distribution network

extending throughout the neighborhood and points beyond to include Philadelphia and surrounding towns. According to the Camden County Police Department, two focal points along Mt. Ephraim Avenue were considered “high density” crime areas in the city for the 2013 reporting period. Over the past few years, hundreds of shootings and dozens of homicides have taken place in this area, much of it associated with open air drug trade. According to the Mt. Ephraim Choice Neighborhood Plan, residents expressed concerns over the lack of high-quality, accessible, and safe open space, particularly related to opportunities for children to experience the natural environment and participate in safe recreational activities.

ii. Cumulative Environmental Issues:

A major element of the City’s 2015 Master Plan is to “Maintain and Improve the Environment,” and the plan’s first goal under this element is to “clean up and remediate known contaminated sites.” Based on an analysis of existing state and federal databases, as well as cataloguing efforts conducted as part of prior EPA brownfields assessment grants, there are at least 210 brownfields in Camden. Petroleum, polycyclic aromatic hydrocarbons, heavy metals, and other contaminants from these brownfields are found throughout the soils and/or groundwater in Camden at concentrations which exceed human health risk-based standards.

The residents living in the shadow of Camden Labs contend with an even greater inequitable distribution of environmental burden that includes a county incinerator plant that borders the community; intermittent odors from the nearby county sewage treatment plant; and water quality challenges associated with combined sewer systems that are well over 100 years old. Finally, because of Camden’s location across the Delaware River from Philadelphia, Camden is home to a major interstate highway and multiple congested state highways. Interstate 676 is located just west of the target area, cutting off the community from Camden’s waterfront and points to the west. As a result, residents suffer from a high volume of truck traffic, increased air pollution, and degraded infrastructure. In 2014, the American Lung Association’s State of the Air report graded Camden County’s air quality an “F.”

Camden has been the focus of other government and university studies that have analyzed air quality, asthma, lead, and environmental justice metrics. In 1996, EPA’s National-Scale Air Toxics Assessment found that Camden had the highest cancer risk from hazardous air pollutants in the country—1,300 in one million. Likewise, the New Jersey Department of Environmental Protection (NJDEP)-led Air Toxics Pilot Project assessed air toxics and particulate matter through an emissions inventory, dispersion modeling for key facilities, risk assessment, and air monitoring. The project concluded that Camden had relatively high particulate levels, some of which included toxic metals like arsenic, cadmium, lead, and nickel, as well as high ambient levels of fine particulate matter detrimental to those citizens with respiratory afflictions. One of NJDEP’s air monitoring stations was located on the Camden Labs site.

iii. Cumulative Public Health Impacts:

According to the 2015 “Community Health Needs Assessment” produced by Cooper University Health Care, chronic diseases such as diabetes, cardiovascular disease, and cancer are significant health concerns in Camden County. A recent survey funded by the US Department of Housing and Urban Development (HUD) of residents’ health in a public housing complex in the Mt. Ephraim area concluded that 60% of residents have high blood pressure, 67% have asthma, 31%

of households included someone with a long-term illness and 37% of households had someone who has been diagnosed with mental health problems.

Health issues are severely impacting children in the target neighborhood. According to the *NJ Childhood Obesity Survey* published by the Rutgers Center for State Health Policy, Camden children are more likely to be obese or overweight. For example, 35% of 3-5 year olds in Camden City are obese or overweight, compared to the national average of 21%. This study cited a lack of physical activity as a contributing factor to increased obesity rates. An identified barrier to physical activity for families in Camden was crime level, pleasantness of neighborhoods and parks, and conditions of sidewalks. According to the National Recreation and Park Association (NRPA) in their “2017 NRPA Agency Performance Review,” the typical park and recreation agency offers one park for every 2,266 residents served, with 9.6 acres of parkland per 1,000 residents. However, the Mt. Ephraim project area falls significantly below this number at 2.7 acres parkland available per 1,000 residents, a rate that is only about 1/3 that for the city as a whole. This inequality in distribution and access is why the City plans to redevelop Camden Labs site as an extension of Whitman Park.

Other initiatives to address Camden’s childhood obesity center on access to healthy, fresh food. Only one full-service grocery store is located in the entire City and close to 40% of those living in Whitman Park do not have access to a vehicle. Another danger is lead poisoning. According to the Camden County Department of Health and Human Services 2015 Annual Report, there were 11 new active cases of childhood lead poisoning in 2015. In addition to lead-based paint in housing, potential sources of lead contamination are lead in the soil and the older buildings on brownfields such as those found at the Camden Labs site. High blood lead levels have been documented to impair learning; a potential contributing factor to the high levels of the target population lacking a high school diploma.

c. Financial Need

i. Economic Conditions:

Camden’s density, coupled with the disproportionate rates of sensitive, economically disadvantaged populations, results in a higher demand for a wider range of social and economic services that is not commensurate with the City’s available financial resources. This dichotomy of a need for services contrasted with scant resources is further exacerbated by the fact that having a concentration of non-profit social service providers means that more property is occupied by those that do not pay local property taxes. Today, almost half of the assessed property value in Camden is exempt from taxation. According to information published by the state’s *Multi-Year Recovery Plan* for Camden, Camden’s tax ratable base is the smallest in NJ on a per capita basis - at approximately one-half that of other cities and one-quarter of Camden County. Given the fiscal state of the city and competing needs for basic services, the City is unable to address the hundreds of brownfields and relies on federal and state funding sources. The majority of the remediation effort will be funded by a State grant; however, without outside assistance in the form of an EPA Brownfields Cleanup Grant, the City is unable to provide the needed matching funding for the State grant, leaving the Camden Labs site a dangerous hazard.

ii. Economic Effects of Brownfields:

Given the robust industrial history of Camden, nearly every redevelopment initiative undertaken by the City of Camden has a brownfield component which needs to be addressed. Brownfields

like Camden Labs represent lost tax revenue and lost job opportunities, and depress the ability for Camden to overcome chronic issues of poverty, unemployment, public health and safety. However, government at all levels is committed to taking action. New Jersey's Economic Opportunity Act of 2013 sought to create a more business-friendly climate by increasing tax incentives for companies to set up shop in New Jersey. The New Jersey Economic Development Authority NJEDA has invested over \$164 million through the Camden Economic Recovery Initiative as of January 2017 and the Camden County Chamber of Commerce boasts that tax credits for hotel complex and waterfront development have driven \$2.5 billion in private investment for the city (njpen.com 1/10/17). In addition, new market-rate apartments are being built or renovated to meet the growing demand from the city's expanding medical community, a new supermarket has opened in Camden for the first time in 30 years, and the City has begun the bond-financed demolition of about 600 abandoned houses. These positive signs make public investment in brownfields even more critical, as the City struggles to maintain this forward momentum and not lose the advances that have been recently made. Despite this new investment and redevelopment, redeveloping brownfields in Camden is still an uphill battle, as the negative value of the real estate in the city means many property owners are underwater and that public subsidy is still needed to leverage private redevelopment into distressed neighborhoods.

2. PROJECT DESCRIPTION & FEASIBILITY OF SUCCESS

a. Project Description

i. Existing Conditions:

Five of the 17 original Areas of Concern (AOC) require additional investigation to inform the cleanup approach and activities in order to achieve the intended transformation of 3.9 acres of brownfields into land suitable for open space and recreation as an extension of Whitman Park. While additional delineation work is slated to be performed immediately before and after the spring 2018 demolition of the vacant compound of approximately 53,000 square feet of institutional buildings, there remains soil and groundwater contamination that has been identified needing to be addressed. This funding will address the likely contamination associated with the septic system that received discharges from the facility as well as mercury contaminated soil and groundwater.

ii. Proposed Cleanup Plan:

The remedial action for soil will include proper closure of the institutional septic system and excavation and disposal of associated contaminated soil; removal and disposal of 2,400 tons of mercury impacted soil; followed by installation of a permeable cap as an Engineering Control, and the recording of a deed notice. The site's groundwater will be addressed with an institutional control; an indefinite-term Classification Exception Area (CEA). The CEA will be established for the site to prevent future groundwater use and will be subjected to long term monitoring.

This combination of remedies will remove the highest concentrations of contamination and prevent exposure to residual site contaminants. All remediation to be performed under this grant would be conducted in accordance with the New Jersey Site Remediation Reform Act, N.J.S.A. 58:10 et seq. and the Technical Requirements for Site Remediation, N.J.A.C. 7:26 et seq. Work will be performed under the oversight of a Licensed Site Remediation Professional (LSRP) with EPA Region 2 personnel providing a level of regulatory review. To ensure that no adverse environmental impact occurs during cleanup activities, the remediation contractor will be

required to prepare a Health and Safety Plan; a transportation plan ensuring that truck traffic is NOT routed through residential areas; and an air monitoring plan to ensure that fugitive dust does not migrate off site.

iii. Alignment with Revitalization Plan:

In 2015, the Camden Redevelopment Authority (CRA) received a site-specific EPA Brownfields Assessment Grant to develop and implement a program to assess the Camden Labs property whose expansion, redevelopment or reuse was complicated by the presence of hazardous substances. In addition, the CRA received an EPA Area-Wide Planning Grant for this neighborhood (AWP). As part of the AWP process, CRA involved residents and other stakeholders surrounding the site by holding community meetings and sharing information. The resulting Mt. Ephraim AWP identifies Camden Labs as a critical catalyst site to spur redevelopment in the neighborhood. It further recommends that the site should be redeveloped as an extension of the adjoining Whitman Park. This type of development would improve the property values of the neighborhood, add much needed recreation space and allow for the addition of green stormwater infrastructure. The AWP builds upon the *Mt. Ephraim Neighborhood Choice Transformation Plan* funded by a 2012 HUD Choice Neighborhoods Planning Grant. The *Choice Transformation Plan* sets forth strategies for using the redevelopment of distressed public housing as a catalyst for neighborhood transformation and suggested a transit-oriented design district around the PATCO light rail station. During the development of the *Choice Transformation Plan*, community members overwhelmingly agreed that the Camden Labs site offered tremendous potential for redevelopment given its size and location. In 2015, a Whitman Park Redevelopment Plan was completed by Wallace Roberts and Todd, LLC and the Enterprise Center to provide site control and land use approvals necessary to support and implement the Mt. Ephraim neighborhood plan. In 2016 the City of Camden received a HUD CHOICE Neighborhoods Implementation Award to move forward with the planned public housing improvements in the Mt. Ephraim neighborhood. The resulting increase in residential population carries with it an need for increased recreational and open space amenities.

b. Task Description & Budget Table

i. Task Descriptions: Costs set forth in the budget are representative of actual expenditures for similar activities conducted for prior EPA grant implementation efforts. The project tasks will include the following:

Task 1 – Cooperative Agreement Oversight & Community Outreach: To ensure the smooth management of the grant, compliance with all reporting and procurement requirements, and timely completion of project tasks, we are in the process of entering an interlocal agreement to have the Camden Redevelopment Agency (CRA) oversee the implementation of the remediation for Camden Labs. CRA routinely undertakes environmental assessment and remediation activities as part of their role to facilitate redevelopment in Camden. For this project, CRA will procure a professional grant management consulting firm that has experience in federal grants management that will: assist in the procurement of the remediation engineering oversight consultant and remediation contractor; work with the site's Licensed Site Remediation Professional (LSRP), NJDEP, and EPA to ensure all environmental and grant requirements are

met; and perform all grant budget tracking, compliance, and reporting activities. The firm will be competitively retained in accordance with all federal, state, and local procurement requirements.

The CRA will provide project management services to manage contractors and act as a liaison with NJDEP. The CRA will also continue to work with the community regarding the remediation and redevelopment of the site. The CRA Project Manager will attend local community meetings as well as meet with community leaders to ensure the public is aware of the ongoing remediation and has the opportunity to raise any concerns during the implementation of the workplan. This includes: placing signs at the site describing the investigation and providing a contact for additional information; the establishment of a public document repository; and the mapping of all nearby sensitive receptors.

The outputs from this task will include the number of: ACRES updates; quarterly reports, MBE/WBE reports, and financial reports submitted; grant-related meetings held; and brownfields conferences attended by staff. Outputs will also include grant closeout documents, the number of public meetings, and calls from the public.

Task 1 Budget - Cooperative Agreement Oversight and Community Outreach				
Item	Qty.	Unit	Unit Cost	Subtotal
Other: CRA Project Management	3	YR	\$4,000	\$12,000
Contractual: Grant Management Consultant	3	YR	\$ 2,500	\$ 7,500
Task 1 Total:				\$ 19,500
AMOUNT TO BE FUNDED BY EPA GRANT:				\$ 19,500

Task 2 – Environmental Engineering: A qualified environmental engineering firm will be procured to provide direct project oversight and management of the remediation effort; prepare state required Public Notification documentation; prepare the Remedial Action Report; and serve as the New Jersey Licensed Site Remediation Professional (LSRP). A deed notice for the soil will provide record of the contaminants and the concentrations that were left in place, and controlled by the cap. The environmental engineer will prepare a Remedial Action Report (RAR), and corresponding Response Action Outcome (state case closeout document). Activities under this task also include costs associated with participation in the NJDEP LSRP remediation oversight.

The outputs from this task will include the number of: Remedial Action Reports; deed notices; site close outs (RAOs) generated; NJDEP document submittals; and signs installed.

Task 2 Budget – Environmental Engineering				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual: Remedial Action Report / RAO	1	LS	\$ 15,000	\$ 15,000
Contractual: Deed Notice	1	LS	\$ 4,000	\$ 4,000
Other: LSRP Participation costs	3	LS	\$ 5,000	\$ 15,000
Contractual: SRRR Forms and Certifications	1	LS	\$ 3,500	\$ 3,500
Contractual: Public Notification	1	LS	\$ 1,500	\$ 1,500
Task 2 Total:				\$ 39,000
AMOUNT TO BE FUNDED BY EPA GRANT:				\$ 39,000

Task 3– Soil Remediation: Activities conducted under this task include the preparation of bid specifications and construction documents to assist the City in procuring a contractor to complete soil remediation; oversight of the remediation contractor; abandon/close septic system and removal and disposal of impacted soils, if encountered. (for budgeting purposes, 550 tons of contaminated soil is estimated); and remove and dispose of an estimated 2,400 tons of mercury impacted soil. Groundwater encountered during soil removal will be pumped from the excavation cavity to an onsite holding tank for characterization analysis and disposal off-site. Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility. This task will also include post-excavation sampling and analysis, the emplacement of clean backfill, and all New Jersey fees, forms or certifications. An engineered cap will be designed and installed to provide a barrier to the contaminants in site soils if needed for the septic system area. The cap will be installed where soil contaminants remain at concentrations above NJDEP soil remediation standards for direct contact.

Outputs consist of bid specifications, number of tons of impacted soil removed, number of tons of certified clean fill brought onto the site as the cap, number of gallons of contaminated groundwater removed, and acres of brownfields readied for redevelopment.

Task 3 Budget – Soil Remediation				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual: Prepare Soil Remediation Bid Specifications	1	LS	\$12,000	\$12,000
Contractual: Oversight of Remediation Contractor	320	Hrs	\$75	\$24,000
Contractual: Close Septic System	1	LS	\$ 20,000	\$ 20,000
Contractual: Cap Impacted Soil	1	LS	\$ 10,000	\$10,000
Contractual: Septic Impacted Soil Removal & Disposal	550	TONS	\$ 100	\$55,000
Contractual: Mercury Impacted Soil Removal & Disposal	2400	TONS	\$ 150	\$360,000
Contractual: Waste Characterization & Disposal of Groundwater	20000	GAL	\$ 0.75	\$15,000
Other: NJ-required permitting fees	1	LS	\$ 7,500	\$7,500
Contractual: Site Restoration (backfill, topsoil & seed)	1	LS	\$ 24,000	\$ 24,000
Contractual: Final As Built Survey	1	LS	\$ 5,000	\$ 5,000
Task 3 Total:				\$ 532,500
AMOUNT TO BE FUNDED BY EPA GRANT:				\$126,100

Task 4 – Groundwater Remediation (Classified Exemption Area): Establish indefinite duration groundwater Classification Exception Area (CEA) to prohibit groundwater use on the site. This will include two rounds of sampling and analysis from existing on-site wells. Outputs for this task are the CEA.

Task 4 Budget – Groundwater Remediation (Classification Exemption Area)				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual: Establish CEA	1	LS	\$ 13,000	\$ 13,000
Contractual: Sampling and Analysis of existing well (2 rounds) inc QA/QC	2	EA	\$ 1,200	\$ 2,400
Task 4 Total:				\$ 15,400
AMOUNT TO BE FUNDED BY EPA GRANT:				\$ 15,400

ii. Budget Table

Categories	Project Tasks				Total
	Task 1	Task 2	Task 3	Task 4	
Personnel					\$0
Fringe Benefits					\$0
Travel					\$0
Equipment					\$0
Supplies					\$0
Contractual	\$7,500	\$24,000	\$158,600	\$15,400	\$205,500
Other (specify)	\$12,000	\$15,000	\$7,500		\$34,500
Total	\$19,500	\$39,000	\$166,100	\$15,400	\$240,000
EPA	\$19,500	\$39,000	\$126,100	\$15,400	\$200,000
Cost Share	\$0	\$0	\$40,000	\$0	\$40,000

c. Ability to Leverage:

The EPA funding will leverage prior and future sources from the City and the City’s partners to ensure successful assessment, cleanup, and redevelopment of the Camden Labs site. The EPA grant will serve as the needed match for the State Hazardous Discharge Site Remediation Fund (HDSRF) match required for HDSRF remediation grants. Documentation of leveraged funding and resources can be found in **Attachment 1** and include:

Source	Purpose/Role	Amount	Status
State HDSRF	Assessment Funding Work not covered by EPA Site Specific Grant	\$192,051	Awarded
State HDSRF	Assessment Funding to cover demolition of building	\$1,358,600	Awarded
State HDSRF	Remediation Grant	\$406,400	Application to be submitted upon notice of receipt of EPA Award. Funding awarded on rolling basis
State Green Act	Park Development	\$300,000	Awarded
TOTAL LEVERAGED FUNDING:		\$2,257,051	

3. COMMUNITY ENGAGEMENT & PARTNERSHIPS

a. Engaging the Community

Involving neighborhood residents, city officials, local organizations, and other stakeholders in planning for the reuse of brownfield sites was one of the key goals of the Mt Ephraim Area Wide Plan (AWP) process to integrate the interests of many stakeholders into the overall redevelopment process. The planning process utilized existing networks of stakeholders and community groups from the Choice Neighborhoods planning process, including the Mayor’s Choice Neighborhood Executive Leadership Council. The Mayor’s Choice Neighborhood Executive Leadership Council, created in 2013, consists of representatives from local partners including the Housing Authority of the City of Camden, Cooper’s Ferry Partnership, and the Camden County Municipal Utilities Authority. The Council, along with representatives from neighborhood groups, became the AWP’s "Steering Committee." The Steering Committee met five (5) times during the planning process and helped ensure continuity with prior planning efforts, supported outreach efforts, solidified the goals of the process, and helped guide the development of reuse concepts and plan strategies. At four public meetings potential uses for brownfields, including specifically the Camden Labs site, were presented to gather feedback and preferences to alternatives.

The structure and network built by these previous planning efforts will continue to guide community outreach regarding the cleanup phase for Camden Labs. As part of the public outreach, we will provide public notification regarding any cleanup activities to stakeholders, owners, and tenants within 200 feet of the site through letters or by posting a sign at the site. As there is a significant Spanish speaking population in the neighborhood, we will post two signs and/or provide bi-lingual notification letters so that both English and Spanish speakers have access to the information. In this way, public notification is ensured for the entire population, including the sensitive, non-English speaking population.

b. Partnerships with Governmental Agencies

When the site was initially investigated, it was enrolled in the state Voluntary Cleanup Program (VCP) and NJDEP provided technical support and regulatory oversight. The VCP was replaced by the Licensed Site Remediation Professional (LSRP) Program in 2009; however, NJDEP continues to serve as an active partner to address brownfields by providing technical assistance and support for many of the large-scale redevelopment projects in Camden. The City of Camden will partner with EPA Region 2 for environmental activities overseen by the LSRP. As previously mentioned, the City will also partner with the CRA. The CRA routinely undertakes environmental assessment and remediation activities as part of their role to facilitate redevelopment in Camden. The City is in the process of entering into an interlocal agreement to have the CRA oversee the implementation of the remediation for Camden Labs. The CRA will manage the project and will be working with EPA to ensure the cleanup work will be conducted in a manner protective of human health and the environment.

c. Partnerships with Community Organizations

i. Community Organization Descriptions & Roles: The CRA has developed strong partnerships with many community organizations, and the following organizations will play a key role in the successful implementation of the EPA funding for the Camden Labs site:

- **Camden SMART (Stormwater Management and Resource Training):** SMART is a public-private initiative developing a comprehensive network of green infrastructure programs and projects. They will be assisting the project with technical assistance and aid in implementing green infrastructure strategies.
- **Center for Family Services (CFS):** A human services agency providing assistance to youth and families, CFS will assist with outreach efforts, including providing their network of stakeholders information about the investigation and eventual redevelopment of the site.
- **Cooper's Ferry Partnership (CFP):** A nonprofit organization dedicated to carrying out development projects across the city, CFP will assist with technical assistance and outreach to community members about the project.
- **Heart of Camden:** This nonprofit rehabilitates homes for low-income families and will assist the project by using its network to keep the community informed and engaged.
- **NJ Conservation Foundation:** This non-profit works to preserve open space and natural resources. Given their office in Camden, they will assist with community outreach.
- **Respond Inc:** Through comprehensive services including child and senior care, job training and housing, Respond works to help people help themselves. They will be serving as a community involvement and outreach mechanism and partnering on providing job training graduates.
- **Rutgers University:** With a campus anchored in Camden, Rutgers has been a valuable partner on issues like facilities and security as well as outreach to the community on revitalization projects in the city, such as the Camden Labs site.
- **Salvation Army Ray and Joan Kroc Corps Community Center:** The Kroc Center, once a landfill itself, houses an array of programs and is an important partner and anchor for the community. They will assist with outreach and by providing meeting space.

ii. Letters of Commitment: Letters from the organizations above are found in **Attachment 2**.

d. Partnerships with Workforce Development Programs

Given Camden's drastic unemployment rates, connecting residents with job opportunities is paramount with any development in the city. As indicated above, the City partners with the nonprofit RESPOND that provides job training programs. RESPOND is primed to provide temporary jobs to Camden residents during construction. The CRA, the agency responsible for contracting for the remediation of the site, routinely provides its contact list of consulting firms in its contractor pool to RESPOND to facilitate job placement for City backed projects.

4. PROJECT BENEFITS

a. Welfare, Environmental and Public Health Benefits

As a catalyst site, the Camden Labs site has been identified as a site the development of which will provide an exponential positive impact on the community. By addressing this site first, it is expected to create a domino effect in the area, precipitating a much-needed decrease in the violent crime rate as a haven for drug sales and illicit activity is eliminated. As it becomes safer to remain outdoors, the new park space will offer residents additional recreation and green space. In this manner, reductions of stress, high blood pressure, obesity, and overall health issues discussed above would be possible. Additional acres of safe green space will also give neighborhood children better opportunities to experience the natural environment and increase their physical activity, current issues identified by parents and health researchers. And last but not least, the removal of contamination and elimination of exposure pathways will have a direct impact on the health of the community, as potential exposures to contaminants will be eliminated, such as those posed by the site's mercury contamination.

b. Economic and Community Benefits

The direct economic and community benefit of redeveloping the Camden Labs site is the reduction of an abandoned hazardous property and blight. This action alone can spur investment and commitment to community change with the byproducts of lowering vacancy rates, increasing property values, and spurring more housing options via compatible redevelopment on adjacent/nearby sites, along with new business and employment opportunities. This project will also generate temporary jobs during the remediation and development.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Audit Findings:

During the implementation of the EPA Brownfields Pilot Grant, the City of Camden was deemed a "high-risk" grantee by EPA. As a result of staffing changes, and the assistance of the City of Camden Redevelopment Agency, the City was able to implement corrective actions and received a grant work plan approval. Shortly thereafter, the high-risk designation was removed.

b. Programmatic Capability

The City is in the process of entering into an interlocal agreement with the City of Camden Redevelopment Agency (CRA) to manage the remediation effort at the Camden Labs site. The CRA staff has managed more than 35 brownfield sites through the state regulatory process and possesses the in-house capacity to oversee the community outreach activities, coordinate with the environmental regulators, and interface with the developers for the brownfields redevelopment efforts. These staff members not only provide the in-house contractor procurement and management of environmental engineering firms, but they also perform the administrative

functions associated with pursuing, receiving and using the state investigation funds. James Harveson, Director of the CRA’s Division of Economic Development, has been overseeing brownfield remediation projects in Camden for more almost a decade, and he will continue to serve as the Project Manager of the this cleanup grant. Mr. Harveson has nearly 30 years’ experience in the areas of urban redevelopment and previously served as the Director of the City of Trenton’s Department of Housing and Development, where he was recognized in New Jersey as an innovator in the area of brownfield redevelopment.

To expand their capacity to address the Camden Labs site and increase the number of brownfields being addressed at any given time, the CRA has contracted with an experienced environmental management firm to provide assistance. This firm assists with programmatic activities like EPA reporting, preparation of site eligibility requests, and budget oversight. This management structure ensures that turnover at the CRA will not negatively impact the Brownfields Program.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes

The outputs anticipated through this grant are listed in each task within the Budget Narrative above, and will be monitored via documentation provided by the contractor and consultants; and reported on in quarterly reports and in ACRES. The outcomes associated with the outputs listed above include: funds leveraged, construction jobs created, acres cleaned, and taxes generated.

d. Past Performance & Accomplishments

i. Currently or Has Received an EPA Brownfield Grant:

1. Accomplishments

Please see summary table below for the City’s EPA Brownfields Cooperative Agreements.

2. Compliance with Grant Requirements

Please see summary table below for the City’s EPA Brownfields Cooperative Agreement. The City successfully expended and closed out the cooperative agreement (two Pilot awards) with no funds remaining. Outcomes have all been reported in ACRES. The City complied with the grant workplan and all terms and conditions, including quarterly reports, MBE/WBE utilization forms, Federal Financial Reports, and ACRES updates.

Grant & Period of Performance	Funds Remaining	Compliance with Requirements	Accomplishments
Knox Meadows II Cleanup Grant BF96267217 10/1/17-9/30/20	\$200,000	All grant requirements to date, consisting of the cooperative agreement package, have been met.	These funds just became available as of 10/1/17. The City has been working with the CRA to get an interlocal agreement in place to spearhead the cleanup.

Grant & Period of Performance	Funds Remaining	Compliance with Requirements	Accomplishments
EPA Pilot Awards BP 99254301 10/1/96-9/30/09	\$0 out of \$743,517 awarded	All grant requirements fulfilled and complied with final, approved grant work plan.	PA/Phase I Reports: four Supplemental SI/Phase II Reports: one SI/ Phase II Scope of Work: one Supplemental RI Workplans: three SAMP/QAPPs: six RI Workplan: one Risk Assessment: one Land Use Planning Report: one IPA: one

- i. Has Not Received an EPA Brownfields Grant: The City has received prior EPA brownfields grants, and thus this section is not applicable.
- ii. Has Never Received Any Federal Assistance: The City has received prior federal funding, and thus this section is not applicable.



ATTACHMENT 1

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DOCUMENTATION OF LEVERAGED FUNDING



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

GREEN ACRES PROGRAM

MAIL CODE 501-01

P.O. BOX 420

Trenton, NJ 08625-0420

TEL: # (609) 984-0500 FAX# (609) 984-0608

RECEIVED
MAY 31 2016

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

May 25, 2016

Ms. Meishka Mitchell
One Port Center
2 Riverside Drive, Suite 501
Camden, NJ 08103

RE: Green Acres Project # 0408-14-045
Whitman Park Improvement Project
Camden City, Camden County

Dear Ms. Mitchell,

As you know, the above-referenced development project has been approved for \$300,000 in matching grant funds. The Green Acres Project Agreements, which will obligate funds for this project, will be sent under separate cover. At this time, there are several items that must be submitted and additional guidelines for project implementation as described below.

1. A **Preliminary Assessment Report** must be conducted and submitted to our office within 60 days of receipt of this letter for review and subsequent comment. Instructions for Completing the Preliminary Assessment Report are attached. This should be your first priority.
2. A **construction schedule** which outlines the anticipated project timeline must be provided.
3. One set of construction drawings for Green Acres **pre-bid** review must be submitted to this office within 90 days of the receipt of this letter. The drawings must be consistent with the approved project scope and signed and sealed by a NJ licensed architect or engineer. The Development Compliance Checklist and Pre Construction Engineering Certification forms described below **must** accompany these drawings.
 - a. When preparing contract specifications, please be reminded that the following statement **must** appear in the newspaper advertisement and invitation to bid:

"Please be advised that State Funds through the Green Acres Program are being utilized in this project. Under N.J.A.C. 7:1-5, vendors currently suspended, debarred or disqualified are excluded from participation on this project."
 - b. The **Mandatory Affirmative Action Language** for Professional and Construction Contracts (P.L. 1975, c. 127) must be incorporated into all contract documents.

- c. The project sponsor must obtain all applicable permits for the project. The permits or letters of waiver must be provided by all agencies claiming jurisdiction prior to this office approving construction drawings.
 - d. A **construction sign** according to the enclosed detail sheet must be erected and maintained for the duration of the project. The tree graphic in the lower right corner of the sign may be obtained from our office at the appropriate time.
4. The enclosed **Pre Construction Engineering Certification Form** must be executed by a licensed professional engineer or architect and returned with the construction drawings.
 5. The enclosed **Development Compliance Checklist Form** must be signed by the local unit's chief executive officer and attorney, certifying that all Green Acres requirements have or will be satisfied.
 6. The enclosed **Local Public Contracts Law Memorandum** must be executed by the local unit attorney as it relates to retention of professional services and construction contracts pursuant to N.J.S.A. 40A: 11-1 et seq. Kindly submit the completed form to our office upon execution of all project-related contracts.
 7. Finally, during construction, project sponsors are strongly urged to minimize the use of change orders as is consistent with the Local Public Contracts Law guidelines and regulations. In order to ensure eligibility, change orders should be submitted to our office for review.

If you have any questions, please feel free to contact me at (609) 341-2058. I look forward to working with you toward the successful completion of this project.

Sincerely,



Phillip M. Collins
Urban Acquisition and Statewide Development

Enclosures



NEW JERSEY ECONOMIC DEVELOPMENT AUTHORITY

June 30, 2017

JaHarvea@ci.camden.nj.us

James Harveson, Director of Economic Development
Camden Redevelopment Agency
520 Market Street
City Hall-Suite 1300
Camden, New Jersey 08101-5120

Re: **HDSRF, NOTICE OF APPROVAL LETTER**
HDSRF, Public Entity Grant Program
Application #P44158
Applicant: Camden Redevelopment Agency
Project Site: Camden Laboratories
Grant Award: Up to \$1,358,600

Dear Mr. Harveson:

I am pleased to inform you that at a meeting held on June 13, 2017, the members of the New Jersey Economic Development Authority (the "Authority") approved the application of Camden Redevelopment Agency for an up to \$1,358,600 Hazardous Discharge Site Remediation Fund (the "Fund") Grant ("Grant") from the New Jersey Department of Environmental Protection (the "Department") for the Remedial Investigation, along with report preparation, at the Camden Laboratories site (the "Project"), as stated in your request for Grant assistance.

The Authority has approved the Grant upon the terms and conditions set forth in this notice of approval letter. No act or omission by or on behalf of the Authority shall be deemed as a waiver to any of the terms and conditions contained in this letter. Such a waiver may be made only by an instrument in writing duly executed by an authorized representative of the Authority.

NAME OF GRANTEE: Camden Redevelopment Agency

PROJECT SITE: Camden Laboratories
1667 Davis Street, Camden, New Jersey
Block 1392, Lot 33
Camden County

GRANT: Up to \$1,358,600 from the Fund

CONDITIONS:

The Grantee shall complete the Project substantially as set forth in its request for Grant assistance.

The interests of the Grantee and the Authority are or may be different and may conflict. The Authority's attorney represents only the Authority and does not represent the Grantee in the Grant transaction. The Grantee, therefore, is advised to employ an attorney licensed to practice in the State of New Jersey, of the Grantee's own choice, to represent the Grantee's interest in the Grant transaction.

The credit of the Grantee and all other features of the transaction shall be as represented to the Authority without material adverse change. The Grantee shall not be involved in any bankruptcy, reorganization or insolvency proceeding.

Counsel to the Authority must be satisfied with respect to the legality, validity, binding effect, and enforceability of all instruments, agreements, and documents used to effect and consummate the transactions contemplated herein.

Each unsatisfied covenant, term and condition of this notice of approval which is not expressly waived in writing by the Authority shall survive any closing hereunder. In case of any conflict between any unwaived and unsatisfied covenant, term or condition of this notice of approval and the provisions of the Grant documents delivered at or pursuant to any closing regarding this Grant, the unwaived and/or unsatisfied covenant, term or condition of this notice of approval shall control.

This notice of approval is subject to acceptance by the Grantee of the terms and conditions contained herein. This notice of approval letter must be signed and returned to the undersigned.

The Authority's commitment shall terminate and the Authority shall have no further obligation in connection with your application if this notice of approval is not signed and returned to the Authority by October 31, 2017. This Approval Letter may be executed and delivered by telecopier, email, PDF or other facsimile transmission of all with the same force and effect as if the same were a fully executed and delivered original manual counterpart.

In addition, in the event that the Grant is not closed on or before 90 days from the acceptance date of the notice of approval, the Authority's obligation to provide Grant shall terminate and you will be required to submit a new application.

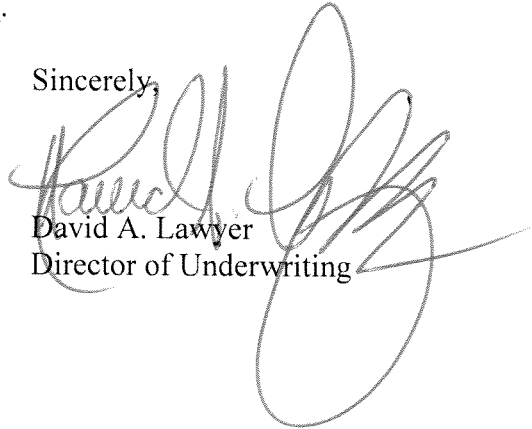
It is specifically understood and agreed that this Grant is *cross-defaulted* with any existing assistance and any future assistance provided by the Authority and/or State to the Grantee and/or any of its subsidiaries including, but not limited to, entities that may not be related to Grantee, but have common principals.

We are pleased to be of service to your Grant needs. If you have any questions regarding this approval letter, please contact Kathy Junghans, Finance Officer at (609) 858-6732 or kjunghans@njeda.com.

If you have any questions regarding the closing requirements for this Grant contact Alexis Krul at 609-858-6750 or akrul@njeda.com.

This fully executed approval letter in its entirety should be returned to Renee Krug, Administrative Assistant, at rkrug@njeda.com.

Sincerely,



David A. Lawyer
Director of Underwriting

AK

cc: Michael Deely, NJDEP

ACCEPTED AND AGREED
THIS _____ DAY OF
_____, 20__ BY:

GRANTEE:

By: _____
Saundra Ross Johnson, Executive Director



August 26, 2016

Jim Harveson
Camden Redevelopment Agency
520 Market Street
City Hall
Suite 1300
PO Box 2293
Camden, NJ 081102

Re: **HDSRF, NOTICE OF APPROVAL LETTER**
HDSRF, Public Entity Grant Program
Application P#42488
Applicant: Camden Redevelopment Agency
Project Site: Camden Laboratories
Grant Award: Up to \$192,051

Dear Mr. Harveson:

I am pleased to inform you that at a meeting held on August 9, 2016, the members of the New Jersey Economic Development Authority (the "Authority") approved the application of the Camden Redevelopment Agency for a \$192,051 Hazardous Discharge Site Remediation Fund (the "Fund") Grant ("Grant") from the New Jersey Department of Environmental Protection (the "Department") for Remedial Investigation, along with report preparation at the Former Camden Laboratories site (the "Project"), as stated in your request for Grant assistance.

The Authority has approved the Grant upon the terms and conditions set forth in this notice of approval letter. No act or omission by or on behalf of the Authority shall be deemed as a waiver to any of the terms and conditions contained in this letter. Such a waiver may be made only by an instrument in writing duly executed by an authorized representative of the Authority.

NAME OF GRANTEE: Camden Redevelopment Agency

PROJECT SITE: Camden Laboratories
1667 Davis Street
Block 1392, Lot 33
Camden County

GRANT: Up to \$192,051 from the Fund

P#42488
Project: CRA Camden Laboratories

MAILING ADDRESS: | PO Box 990 | TRENTON, NJ 08625-0990

SHIPPING ADDRESS | 36 WEST STATE STREET | TRENTON, NJ 08625 | 609.858.6700 | E-Mail: njeda@njeda.com | www.njeda.com

CONDITIONS:

The Grantee shall complete the Project substantially as set forth in its request for Grant assistance.

The interests of the Grantee and the Authority are or may be different and may conflict. The Authority's attorney represents only the Authority and does not represent the Grantee in the Grant transaction. The Grantee, therefore, is advised to employ an attorney licensed to practice in the State of New Jersey, of the Grantee's own choice, to represent the Grantee's interest in the Grant transaction.

The credit of the Grantee and all other features of the transaction shall be as represented to the Authority without material adverse change. The Grantee shall not be involved in any bankruptcy, reorganization or insolvency proceeding.

Counsel to the Authority must be satisfied with respect to the legality, validity, binding effect, and enforceability of all instruments, agreements, and documents used to effect and consummate the transactions contemplated herein.

Each unsatisfied covenant, term and condition of this notice of approval which is not expressly waived in writing by the Authority shall survive any closing hereunder. In case of any conflict between any unwaived and unsatisfied covenant, term or condition of this notice of approval and the provisions of the Grant documents delivered at or pursuant to any closing regarding this Grant, the unwaived and/or unsatisfied covenant, term or condition of this notice of approval shall control.

This notice of approval is subject to acceptance by the Grantee of the terms and conditions contained herein. This notice of approval letter must be signed and returned to the undersigned.

The Authority's commitment shall terminate and the Authority shall have no further obligation in connection with your application if this notice of approval is not signed and returned to the Authority by December 24, 2016. This Approval Letter may be executed and delivered by telecopier, email, PDF or other facsimile transmission of all with the same force and effect as if the same were a fully executed and delivered original manual counterpart.

In addition, in the event that the Grant is not closed on or before 90 days from the acceptance date of the notice of approval, the Authority's obligation to provide Grant shall terminate and you will be required to submit a new application.

It is specifically understood and agreed that this Grant is *cross-defaulted* with any existing assistance and any future assistance provided by the Authority and/or State to the Grantee and/or any of its subsidiaries including, but not limited to, entities that may not be related to Grantee, but have common principals.

We are pleased to be of service to your Grant needs. If you have any questions regarding this approval letter, please contact me at (609) 858-6732 or kjunghans@njeda.com.

If you have any questions regarding the closing requirements for this Grant contact Closing Officer Kathleen Smith at 609-858-6766 or ksmith@njeda.com.

Sincerely,

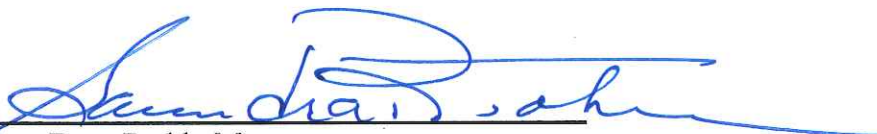


Kathy Junghans
Finance Officer
Credit Underwriting

ACCEPTED AND AGREED
THIS 7th DAY OF
September, 2016 BY:

GRANTEE:

By:



~~Dana Redd, Mayor~~

Sandra Ross Johnson
Executive Director -
City of Camden Redevelopment Agency

cc: Michael Deely, NJDEP



ATTACHMENT 2
-
COMMITMENT LETTERS



November 13, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

Dear Mayor Redd,

This letter is in response to the letter of commitment for the Camden Redevelopment Agency's EPA Grant applications.

The Camden SMART (Stormwater Management and Resource Training) Initiative is to develop a comprehensive network of green infrastructure programs and projects for the City of Camden. The Initiative is a collaboration between the City of Camden, Camden County Municipal Utilities Authority, Cooper's Ferry Partnership, Rutgers Cooperative Extension Water Resources Program, New Jersey Tree Foundation, NJ Department of Environmental Protection, our public-private partners, community organizations, and most importantly, Camden residents to restore and revitalize our neighborhoods. The Initiative includes neighborhood green and grey infrastructure projects, stormwater management policy development, and green infrastructure training programs.

The work proposed in these EPA grant applications go hand in hand with the goals of Camden SMART. Remediation of the Camden Labs and 7th and Kaighn sites would vastly aid in removing the contamination at these properties and allow for improved environmental and social concerns. Revitalization of our water quality and the development of green infrastructure is something we strive for.

Camden SMART wholly supports these applications and commits to providing technical assistance and aid in the green infrastructure during redevelopment planning. By getting involved in the initial stages of development, we have been successful with implementing both large and small green infrastructure elements within the development of sites throughout the City.

Sincerely,

A handwritten signature in blue ink that reads 'Caroline Gray'.

Caroline Gray
Project Manager
Cooper's Ferry Partnership
Camden SMART Initiative



PREVENTION | INTERVENTION | EDUCATION

WWW.CENTERFFS.ORG

November 13, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

Dear Mayor Redd,

The Center for Family Services is a nonprofit human services agency based in Camden that serves youth and families in southern New Jersey. We provide a comprehensive continuum of care dedicated to changing the odds for children and families through prevention, intervention, and education. At the Center for Family Services, we work every day to strengthen families and make the world we live in a better place- one child, one family at a time. As the convening partner for the City's Promise Zone we coordinate the initiatives and programs among all the implementing partners.

In recent years we have seen an increase in the need for services. In order to meet the growing and changing needs of those who live in our community, we have strengthened our current programs, increased our service reach, and launched new initiatives to include the Federal Promise Zone designation. This has included engaging partners, including the Camden Redevelopment Agency, to support long term community investment.

We are pleased to hear that the City of Camden is seeking Federal Environmental Protection Agency funding that will afford clean-ups of vacant contaminated sites. Such locations are not only an eyesore but are also known to encourage illicit activities. Redeveloping these sites into housing, commercial, and waterfront park reuses will offer job opportunities and other advantages for area residents. We stand ready to support the City of Camden and the Camden Redevelopment Agency in these efforts, including providing our network of stakeholders with information about the sites that could lead to benefits for local children and older residents alike. Specifically, we commit to coordinating the Promise Zone program with efforts associated to redevelop the brownfield sites targeted by the Federal Environmental Protection Agency funding.

Regards,

Richard Stagliano
President/CEO





COOPER'S FERRY PARTNERSHIP

LIVE | WORK | INVEST | CAMDEN

November 13, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

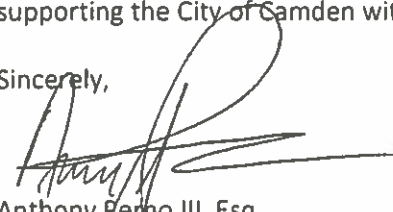
Dear Mayor ^{Redd} Redd:

Cooper's Ferry Partnership (CFP) is a private, non-profit corporation dedicated to creating and carrying out development projects within the City of Camden. We seek to establish public and private partnerships to effect sustainable economic revitalization and promote Camden as a place in which to live, to work, to visit and to invest. We develop long-range plans for the redevelopment of Camden and work with private sector, government, and community partners to make these plans a reality. We have partnered with the City of Camden on many redevelopment projects, and given the city's industrial heritage, many of these sites have been brownfields.

In 2007, a resident-driven community planning process for the Cramer Hill neighborhood of Camden began. CFP saw an opportunity to coordinate a waterfront park planning process in conjunction with the neighborhood plan. CFP oversaw development of a concept plan for a linear waterfront park that would extend along the Cooper River and Delaware Back Channel in Cramer Hill. The plan's objectives included maximizing waterfront access with the creation of a multi-use greenway trail with regional linkages, extension of key neighborhood streets to the river, programming of passive and active recreational facilities and identifying areas for waterfront development. The Waterfront Park Plan, which was unveiled in May 2009, represents a vision for the waterfront's future. CFP is serving as the project manager for the remediation and the redevelopment of the waterfront park.

I am writing this letter in support of the City of Camden's proposals for Brownfields Cleanup Grants. CFP fully supports the City of Camden's efforts. If this funding is awarded, CFP will assist Camden with outreach to community members about the projects. We will also ensure coordination of the redevelopment and remediation of the waterfront area. We are also able to provide technical assistance to the City throughout remediation as needed. We strongly support these applications and commit to supporting the City of Camden with implementation of the grants.

Sincerely,


Anthony Ferno III, Esq.
CEO



November 14, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

Dear Mayor Redd:

The Heart of Camden's mission is to restore the dignity and quality of life of the Waterfront South Community through programs for housing restoration, economic expansion, and human development. The Heart of Camden creates and implements a variety of programs designed to address the crippling barriers to individual and community development. These programs, which are essential for individual, social, and economic development, assist people with jobs, recreation, and homeownership.

Since its founding in 1984, the Heart of Camden has rehabilitated over 200 homes for low-income families, many of who work in local business districts, hospitals, schools, and nearby industrial parks or retail stores. They empower the residents of Camden to improve the quality of their lives and demonstrate that homeownership is within reach. As these homes are developed, they create job opportunities for qualified residents to help build, administer and become business owners within the City.

The Neighborhood Revitalization Tax Credit (NRTC) program significantly facilitates community development and neighborhood change. The Heart of Camden has utilized this critical resource to have a powerful impact on the local community. Accomplishments have included:

- A decorative wrought iron gate and stately 11-ft-high mahogany doors (both manufactured in Camden) provide stunning curb appeal for the Fireworks Art Center.
- Inside the Fireworks Art Center, a donated printing press sits crated as a woodworking shop is taking shape. Wood framing now delineates the gallery space just inside the front door and the studios upstairs.
- Beautiful stained glass windows encased in stone from the previous Church of Our Savior welcome visitors to the Camden Shipyard and Maritime Museum where boatbuilding with inner city kids is an important tool for both spiritual and practical components.
- The birth of the Camden Shipyard and Maritime Museum has added to the cultural landscape of Camden City and the surrounding region.

It is an exciting time of hope and opportunity in Waterfront South where the Heart of Camden is spearheading advantageous results in our communities. Our new NRTC projects consist of a Café-Writer's Retreat-Garden and District Council Collaborative Board for community policing.

The Café-Writer's Retreat-Garden includes the renovation of an existing commercial/residential property that will create a home to a range of creative and educational programs. This will also revitalize prime real estate at Broadway & Ferry, opening the only sit-down eatery in Waterfront South, while also supporting healthy expression through the written word and honoring Camden's internationally renowned haiku poet Nick Virgilio.

Our venture with the District Council Collaborative Board (DCCB) provides direct support and will be part of the "community policing" effort. This effort is key to the success of the transfer of policing responsibilities from the city to the county. This district council will have functions, officers, staff and the Heart of Camden will provide the council with office space and meeting rooms.

Completion of these projects will advance the revitalization of the neighborhood. Making Waterfront South more fully occupied by homes, businesses, and facilities, and a more aesthetically pleasing and welcoming neighborhood, will complement the revitalized central business district at the north end of Broadway, while establishing "anchors" for the improvement of the Broadway Corridor in the neighborhoods in between. Through networking of shared resources and experiences The Heart of Camden will work toward providing the solutions to reduce the deterioration of our society.

We were excited to learn about the EPA Brownfields Grant applications that the City of Camden is looking to pursue. As an organization vested in the improvement of the city for all its residents, we would love to see the City receive these grants. We would wholly support working with our organization and getting the word out throughout the community. Please let us know how we can help. We are committed to seeing the continued success of our neighborhood.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Morales', written on a light-colored background.

Carlos Morales
Executive Director

BAMBOO BROOK
170 LONGVIEW ROAD
FAR HILLS, NJ 07931
908-234-1225
908-234-1189 (FAX)
info@njconservation.org
www.njconservation.org



November 10, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

Dear Mayor Redd,

The New Jersey Conservation Foundation (NJCF) seeks to preserve New Jersey's land and natural resources for the benefit of all. Through acquisition and stewardship, NJCF protects strategic lands, promotes strong land use policies, and forges partnerships to achieve conservation goals. As the NJCF representative with an office in Camden, I am responsible for efforts in land acquisition and conservation in the City of Camden in support of the Camden Greenways initiative. Given the vast number of brownfields in Camden, I encounter brownfields redevelopment projects on a daily basis.

I therefore support the Camden Redevelopment Agency's applications for Environmental Protection Agency Brownfields Cleanup Grants. NJCF supports these applications because they could lead to revitalization of highly contaminated sites, which will of course benefit both the environment and local residents.

If the Brownfields grants are awarded, NJCF will continue to support the City of Camden and the Camden Redevelopment Agency's efforts by conducting community outreach about the progress of the brownfields program in general as well as individual projects like these. I strongly support these grant applications.

Sincerely,

A handwritten signature in black ink, appearing to read "Olivia Glenn". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Olivia Glenn
Regional Manager, South Jersey Metro



Respond, Inc.

BUSINESS/PERSONNEL OFFICE
532 State Street
Camden, NJ 08102
Phone: (856) 365-4400
Fax: (856) 365-8671
Email to williams@respondinc.com
Website: www.respondinc.com



WILBERT MITCHELL
Executive Director

ADMINISTRATION
EARLY CARE AND EDUCATION
SOCIAL SERVICES/INTAKE
ADULT SERVICES
Phone: (856) 365-4403 or 365-4400
Adult & Social Services Fax (856) 541-4478
Executive Director Fax 856-365-4408

November 15, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

Dear Mayor Redd:

Respond, Inc. is a charitable, 501(c)(3) agency created by community residents to enhance and promote the economic independence and general welfare of individuals and families residing in Camden City and the county.

Since 1967, this mission has been carried forth in the provision of comprehensive services in: child care, a senior adult center, programs for homeless adults, rental housing and home ownership, youth services, economic development, employment and job training, and associated programs that help people help themselves.

Respond has previously worked with Camden Redevelopment Agency on brownfields efforts. It is my understanding that the Agency is now applying for an EPA clean-up grant for the Camden Labs property located in the Mount Ephraim section of town. This property, surrounded by a residential area just blocks from the rail station, has a long industrial history including housing a hospital and medical lab. As a result of a 2012 US Department of Housing and Urban Development Choice Neighborhoods Planning grant, this neighborhood was identified as a priority for revitalization.

Given our mission to provide services for all, we fully support this application which would give the area residents opportunities for safer, cleaner living circumstances. Respond will continue to be supportive of the Agency's brownfields redevelopment efforts by serving as a community involvement and outreach mechanism. Further, we will also work with the Agency on identifying where the talents of our job training graduates may be utilized on clean-up projects.

Regards,


Wilbert Mitchell
Executive Director

Celebrating 50 years of services to the Community!

BANK STREET CHILD CARE and INFANT CENTER
155 Marlton Pike
Camden, NJ 08105
(856) 963-9155 Fax (856) 964-6382

FAIRVIEW VILLAGE CHILD CARE
3003-3007 Fenwick Road
Camden, NJ 08104
(856) 342-7997 Fax (856) 342-7581

INFANT CHILD CARE
309 Vine Street
Camden, NJ 08102
(856) 966-8282 Fax (856) 966-0039

LINDEN STREET CHILD CARE
400 North 9th Street
Camden, NJ 08102
(856) 966-0089 Fax (856) 966-0413

NORTH CAMDEN CHILD CARE and INFANT CENTER
554 State Street
Camden, NJ 08102
(856) 966-9081 Fax: (856) 966-9082

PYNE POYNT CHILD CARE and INFANT CENTER
924 N. 8th Street at Eric
Camden, NJ 08102
(856) 583-2630 Fax (856) 583-2631

WINSLOW CHILD CARE
Hall and Albertson Road
Winslow, NJ 08095
(609) 567-0020 Fax (609) 567-6083

ELDERS at the Meadows
400 North 9th Street
Camden, NJ 08102
(856) 541-8742 Fax (856) 541-3126

P.A.T.H. HOMELESS SERVICES
816-820 North 5th Street
Camden, NJ 08102
(856) 365-6597 Fax (856) 365-0431

New Worker Job Development Center SAYRE TRAINING COMPLEX
924-925 N. 8th Street at Eric St.
CAMDEN, NJ 08102
856-583-2640

November 13, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

Dear Mayor Redd,

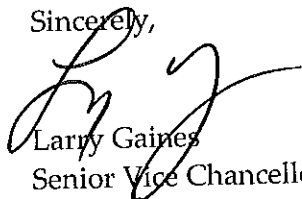
As the southernmost campus of Rutgers, the State University of New Jersey, our campus in Camden offers all the advantages of being part of a major research university combined with the close-knit structure of a small campus. Rutgers has a strong commitment to communities in New Jersey, having provided brownfields outreach and technical assistance state-wide for many years through our National Center for Neighborhood and Brownfields Redevelopment. Rutgers-Camden is pleased to support the Camden Redevelopment Agency's applications for U.S. EPA Cleanup Grants for the Camden Labs and 7th and Kaighn sites. The overall health of the city is important to Rutgers, and we believe in the good work that the Agency is accomplishing.

As Senior Vice Chancellor, I often partner with community residents on issues like facilities and security. Through the work which can be accomplished with the assistance of these U.S. EPA grants, the Camden Redevelopment Agency will be able to address issues associated with contaminated sites, which positively impacts the state of housing and community development in the city.

The Rutgers-Camden Campus Plan provides for a collegiate environment that enhances the quality of life and education at the University and in the City of Camden. One of our initiatives includes strengthening residential life in and around the University by supporting market-rate housing in the Cooper Grant neighborhood.

These grants will enable the City of Camden and the Camden Redevelopment Agency to move forward on redevelopment and revitalization of local neighborhoods, creating opportunities for those who live, study, work, and play in the city. We therefore strongly support these grant applications and will gladly provide outreach support about grant activities to students, staff, and community members.

Sincerely,



Larry Gaines
Senior Vice Chancellor for Administration and Finance



The Salvation Army

Ray and Joan Kroc
Corps Community Center

William Booth
Founder

André Cox
General

William A. Bamford III
Territorial Commander

Ivan K. Rock
Divisional Commander

ADVISORY BOARD

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Melinda Sanchez
Frank X. Simpson

Jack Tarditi
Liz Thomas

Dr. Thomas J. Venables

November 8, 2017

Mayor's Office
520 Market Street
City Hall, Fourth Floor
P.O. BOX 95120
Camden, New Jersey 08101-5120

Dear Mayor Redd,

As you know, The Salvation Army Ray and Joan Kroc Corps Community Center in Camden opened in October 2014. The programs and ministry of the Kroc Center will impact the families of this city and region for generations to come. The Center hosts a 120,000 square foot facility on a 24 acre parcel of an 85 acre former landfill in the Cramer Hill neighborhood. True to the Army's approach of "ministering to the whole person," the Kroc Center houses an array of programs designed to address the economic, educational, health, recreational, and spiritual needs of the communities it serves.

LIFE MEMBERS

Hank Mülle
C. Carney Savery

Establishment of the Center has required years of coordination and fundraising, and as the Administrator, I have worked hand-in-hand on a daily basis with partners like the City of Camden, the New Jersey Department of Environmental Protection, the Camden Economic Recovery Board and the Camden Redevelopment Agency. I am writing this letter in support of the Camden Redevelopment Agency's applications for Environmental Protection Agency funding for the cleanup of contaminated brownfields within the Center project area. I cannot emphasize enough just how much this Environmental Protection Agency funding is needed Camden to reach its full potential.

The Kroc Center has generated approximately 40 full-time jobs and 95 part-time jobs. The Center represents one of the most significant private investments ever made for community revitalization and social services in South Jersey. We greatly appreciate your continued support of our project and look forward to our continued involvement with the Cramer Hill Brownfield Development Area Steering Committee.

Blessings!

Sincerely,

Major Terry Wood



ATTACHMENT 3
-
THRESHOLD ELIGIBILITY

Threshold Criteria, Camden Laboratories Site**1. Applicant Eligibility**

Eligible Entity: The City of Camden is a Local Government. As such, is an eligible applicant.

2. Site Ownership The City of Camden foreclosed and acquired title on this parcel on November 9, 2017. See **Attachment 3.1**.

3. Basic Site Information

(a) The site is known as the Camden Laboratories (Camden Labs) site.

(b) The site address is 1667 Davis Street, Camden, NJ 08103. The targeted site is described as City of Camden Lot 33, Block 1392.

(c) The current owner of the site is the City of Camden.

(d) Not applicable.

4. Status and history of contamination at the site (a) The site is contaminated by hazardous substances. (b) The property was originally developed in the early 1920s as a hospital for contagious diseases and transformed into the South Jersey Medical Research Foundation Laboratory in the 1950s. The site was purchased by Camden Laboratories, LP, in 1989 and operated as a series of bio-medical lab facilities until at least 2007. The site was vacant after 2008. The site currently consists of approximately 102,000 SF of asphalt-paved parking areas and a vacant compound of institutional buildings of about 53,000 SF. The structures are in extremely poor condition and have been subject to vandalism and illegal dumping. (c) Environmental concerns include contamination associated with the septic system that received discharges from the facility and mercury contamination in soil. Groundwater in the area is also contaminated with chlorinated solvents. (d) From site investigations and limited environmental remediation activities conducted in 1989 and 2009, the site is known to be contaminated with mercury impacted soil and chlorinated solvents in groundwater, remnants from its history as a hospital and medical bio-tech facility.

5. Brownfields Site Definition (a) The site is not listed, nor is it proposed for listing, on the National Priorities List. (b) The site is not believed to be subject to Federal unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. (c) The site is not subject to the jurisdiction, custody, or control of the US government.

6. Environmental Assessment Required for Cleanup Proposals The site is currently an active case with the New Jersey Department of Environmental Protection (NJDEP) Site Remediation Program (SRP) with Program Interest (PI) No. 016718 and has been subject to multiple Site Investigations and Remedial Investigations under the oversight of the NJDEP since 1989. The various phases of investigation and remediation include the closure of the three (3) fuel oil USTs in 1989; Preliminary Assessments were conducted in 2007 and in 2017. Site Investigations (Phase II equivalents) were conducted in 2008 and in 2009.

7. **Enforcement or Other Actions** The site is not subject to any ongoing or anticipated environmental enforcement actions.
8. **Sites Requiring a Property-specific determination** It is not believed that a Property-Specific Determination is needed.
9. **Site Eligibility and Property Ownership Eligibility**
 - (a) **Property Ownership Eligibility**
 - (1) **CERCLA §107 liability:** The City is not potentially liable for contamination at the site under CERCLA Section §107 as we believe that we qualify for a liability defense. Compliance with the required liability defense provisions are presented below.
 - (2) **Information on liability and the defenses/protection:**
 - a. **Information on the Property Acquisition:**
 - i) **How Property was Acquired:** The City of Camden acquired the property via foreclosure for unpaid taxes.
 - ii) **Date of Acquisition:** The City of Camden acquired the property on November 9, 2017.
 - iii) **Nature of Ownership:** The City is sole owner of the property (fee simple).
 - iv) **Name of party from whom property was acquired:** N/A Property was foreclosed.
 - v) **Relationship with Prior / Former Owner:** The City does not have contractual relationships with any prior owners and/or operators of the site.
 - b. **Timing and /or Contribution Toward Hazardous Substances Disposal:** All known disposal of hazardous substances at the site occurred before the City acquired the property. The City did not cause or contribute to the release of hazardous substances at the site. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
 - c. **Pre-Purchase Inquiry:** Not applicable as the City did NOT purchase the property.
 - d. **Post–Acquisition Uses:** Since acquiring the property, additional investigations have been conducted at the site. The City has not permitted any operations or uses at the site.

- e. **Continuing Obligations:** The City has continued to conduct assessment work at the site even prior to foreclosing on the property. Most recently a Preliminary Assessment/Phase I Environmental Site Assessment, Quality Assurance Project Plan, and Remedial Investigation Workplan were completed earlier this year 2017. This summer, the City removed massive amounts of trash that has been dumped at the site and made repairs to the fencing in an effort to staunch the dumping activities and unauthorized site access. In 2018 it is anticipated that the buildings will be demolished with the wastes properly disposed of off-site. The City hopes to obtain EPA cleanup grant funds to remove the highest levels of contamination and prevent exposure to residual site contaminants from the abandoned septic system and mercury impacted soil and groundwater. Furthermore, the City has not permitted any operations on the targeted site so as to avoid unintentional exposure to existing contamination. The City is committed to complying with all land-use restrictions and institutional controls required at the site, as well as to assisting and cooperating with those performing the cleanup and providing access to the property. In addition, the City will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and will provide all legally required notices.

(b) Property Ownership Eligibility – Petroleum Sites: Not applicable, as this site is not a petroleum site.

10. Cleanup Authority and Oversight Structure

- a. When the site was initially investigated, NJDEP provided technical support and regulatory oversight. Since the state Voluntary Cleanup Program previously overseen by NJDEP no longer exists, future cleanup of this site will be required to be conducted under the oversight of a Licensed Site Remediation Program (LSRP). The City will partner with EPA Region 2 for environmental activities overseen by the LSRP. As such, the City will be working with EPA to ensure the remediation work will address contamination in a manner appropriate to the planned site reuse and protective of human health and the environment. The City of Camden Redevelopment Agency (CRA) provides assistance to the City. The CRA routinely undertakes environmental assessment and remediation activities as part of their role to facilitate redevelopment in Camden. We are in the process of entering into an interlocal agreement to have the CRA oversee the implementation of the remediation for the Camden Labs project. All remediation to be performed under this grant would be conducted in accordance with the New Jersey Site Remediation Reform Act, N.J.S.A. 58:10C-1 et seq.; the Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-12 and implementing regulations in the Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C; and the Technical Requirements for Site Remediation, N.J.A.C. 7:26E, under the oversight of a Licensed Site Remediation Professional (LSRP).
- b. The City has broad rights to access the property for redevelopment purposes, including environmental testing. While the preferred option will be to talk to neighboring

property owners and negotiate voluntary access, in the event that there is evidence that contamination may have migrated off-site, both the City and the State of New Jersey have the authority to enter neighboring properties and conduct required sampling.

11. Community Notification

- a. A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the site and can be found in **Attachment 3.2**. It outlines the contamination and issues of the site, offering three alternatives approaches for its clean up, of which Alternative #2 is recommended. We provided an opportunity for the community to learn of our intent to apply for this cleanup grant and solicited public comments for incorporation into the grant application as well as the draft ABCA. A project fact sheet was prepared and distributed to assist with communication about the grant application and to solicit public comments.
- b. The community notification advertisement was published November 2, 2017 in the local *Courier-Post*.
- c. On November 9, 2017, the City of Camden and the CRA held a public meeting to discuss this grant application. No stakeholders attended the meeting. In order to solicit further public comments, the application will be provided for review and comment even after the application is submitted to EPA.
- d. Associated documentation is found in **Attachment 3.3**.

12. Statutory Cost Share

- a. The cleanup activities for this site will be funded through a combination of this EPA grant application and State ERB monies that are in the process of being reallocated to another project. Please see the Leveraged Funding Documentation in **Attachment 1**.
- b. A hardship waiver for the cost share is not being requested.



ATTACHMENT 3.1

-

**THRESHOLD
ELIGIBILITY: SITE
OWNERSHIP**



Camden County Document Summary Sheet

CAMDEN COUNTY CLERK
520 MARKET ST
CAMDEN NJ 08102

Return Name and Address
Michelle Banks-Spearman
Assistant City Attorney
City Hall Room 419
P.O. Box 95120
Camden, NJ 08101-5120

Official Use Only

Submitting Company		City of Camden Office of the City Attorney			
Document Date (mm/dd/yyyy)		11/09/2017			
Document Type		Final Judgment In Rem Foreclosure			
No. of Pages of the Original Signed Document (Including the cover sheet)		6			
Consideration Amount (If applicable)					
First Party <i>(Grantor or Mortgagor or Assignor)</i> <i>(Enter up to five names)</i>	Name(s)	<i>(Last Name First Name Middle Initial Suffix)</i> <i>(or Company Name as written)</i>		Address (Optional)	
	City of Camden				
Second Party <i>(Grantee or Mortgagee or Assignee)</i> <i>(Enter up to five names)</i>	Name(s)	<i>(Last Name First Name Middle Initial Suffix)</i> <i>(or Company Name as written)</i>		Address (Optional)	
	Block 1392, Lot 33, 1667 Davis Street assessed to Camden Laboratories				
Parcel Information <i>(Enter up to three entries)</i>	Municipality	Block	Lot	Qualifier	Property Address
	City of Camden	1392	33		1667 Davis Street
Reference Information <i>(Enter up to three entries)</i>	Book Type	Book	Beginning Page	Instrument No.	Recorded/File Date

*DO NOT REMOVE THIS PAGE.

DOCUMENT SUMMARY SHEET (COVER SHEET) IS PART OF CAMDEN COUNTY FILING RECORD. RETAIN THIS PAGE FOR FUTURE REFERENCE.

0

MARC RIONDINO
 City Attorney
 Office of the City Attorney
 City Hall - 4th Floor - Suite 419
 PO Box 95120
 Camden, New Jersey 08101-5120
 (856)757-7170
 By: MICHELLE BANKS-SPEARMAN [ATTORNEY ID# 017981986]
 Assistant City Attorney
 Attorney for Plaintiff, City of Camden

CITY OF CAMDEN,	:	SUPERIOR COURT
Plaintiff,	:	CAMDEN COUNTY
	:	CHANCERY DIVISION
	:	
	:	Docket No. F-008389-16
v.	:	Civil Action
	:	
Block 1392, Lot 33	:	IN REM
1667 Davis Street	:	
Assessed to	:	FINAL JUDGMENT
Camden Laboratories	:	
Defendant.	:	

This cause being opened to the Court by Michelle Banks-Spearman, Assistant City Attorney and Attorney for the Plaintiff, and it appearing that the Plaintiff filed its Complaint and Amended Complaint to foreclose pursuant to the provisions of the "In Rem Tax Foreclosure Act" N.J.S.A. 54:5-104.29, et seq., as amended in the Rules of this Court governing practices and procedures to Foreclose In-Rem, certain tax sale certificates as follows:

Schedule Number	Certificate Number	Recorded in register of Camden County Mortgage Book & Page	Name of Owner as it appears on last tax duplicate	Description of land as it appears on tax duplicate and in certificate of tax sale
1	13-03327	Book 9858, Page 1799	Camden Laboratories	Block 1392, Lot 33, 1667 Davis Street

; and

IT FURTHER APPEARING that notice of this foreclosure action in the form prescribed by said Act and Rules of the Court was published once on September 16, 2016 and September 15, 2017, in the Courier Post, a newspaper circulating in the City of Camden, the municipality where the properties to be affected are located; that notice was posted in the offices of the Tax Collector of the City of Camden, the County Clerk of the County of Camden and in three (3) other conspicuous places within the municipality within which said lands are located; that notice of foreclosure was served upon all parties to this action, including mortgagees of record and forwarded to the Attorney General in accordance with Rule 4:64-7(c) of the rules of this Court; and

IT FURTHER APPEARING no answers have been filed in this cause by persons having, or claiming to have a right, title or interest in or lien upon any parcel of lands described in the Complaint herein within the time fixed by Rule 4:64- 7(c).

IT FURTHER APPEARING that Plaintiff has filed a copy of the

Complaint and Amended Complaint in the Office of the Tax Collector of the City of Camden, in the Office of the County Clerk of Camden County and in the Office of the Attorney General of the State of New Jersey; and the Court having read and considered the verified, Complaint and Amended Complaint filed herein, together with the proofs of publication and service of said Notice of Foreclosure; and

IT FURTHER APPEARING that the Court has read and considered the affidavit showing that there have been no redemptions of the tax sale certificates, submitted herewith;

IT FURTHER APPEARING that all or a portion of some or all of the lands against which Final Judgment is now entered in favor of the plaintiff may be subject to a paramount claim by the State of New Jersey to the degree they are lands currently flowed by the mean high tide, or subject to the limitation against actions set forth in Article 9, Section V, Paragraph 1, of the New Jersey Constitution (1947), to the degree they are lands formerly flowed by the mean high tide. This judgment does not affect whatever paramount title the State may have in any tidelands involved in this action; and the Court being satisfied and having determined that there has been compliance with N.J.S.A. 54:5-104.29 et seq., and the Rules-of the Court;

IT IS THEREUPON on this 9th day of November, 2017 ORDERED and ADJUDGED that all persons having a vested or contingent title

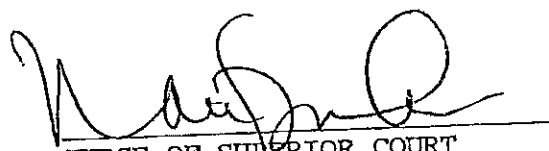
or interest in, or lien or claim upon or against the properties, more fully described in the tax foreclosure list annexed hereto as Schedule A , including the State of New Jersey, and any agency and personal representative and their or any of their heirs, devisees, executors, administrators, grantees, assignees or successors in right, title or interest, notwithstanding any infancy or incompetency of such person or persons, and all other persons, their heirs, devisees, executors, administrators, grantees, assignees or successors be barred of the right of redemption and be foreclosed of all prior or subsequent alienations and descents of said lands and encumbrances thereon, including mortgages and leases or tenancies; and that an absolute and indefeasible estate of inheritance in fee simple in aforesaid properties be vested in the Plaintiff, the City of Camden a Municipal Corporation of the State of New Jersey.

IT IS FURTHER ORDERED, that this Judgment shall not be binding on the State of New Jersey with regard to its tidelands, and does not extinguish the State's paramount title to any tidelands, or any of the properties listed herein which may be claimed by the State of New Jersey as lands now or formerly flowed by the mean high tide.

IT IS FURTHER ORDERED and ADJUDGED that the Plaintiff, City of Camden, is granted actual possession against all other persons of all properties in which title in fee simple is vested in it by

this Final Judgment and such process as is necessary and proper to secure plaintiff actual possession of aforesaid properties is hereby authorized.

Sch. No.	Transferee of Purchaser of Title	Dated	Date Recorded	Deed Book/Page
1	Camden Laboratories	05/01/89	05/05/89	4369/420



JUDGE OF SUPERIOR COURT



ATTACHMENT 3.2

-

THRESHOLD

ELIGIBILITY: ABCA

Analysis of Brownfields Cleanup Alternatives

DRAFT

**Camden Laboratories
1667 Davis Street (Block 1392, Lot 33)
Camden, New Jersey**

Prepared by BRS, Inc. for the

The City of Camden
520 Market Street
City Hall
Camden, New Jersey

November 2017



DRAFT
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ATTACHMENTS

- A. Site Location Map
- B. Summary of Public Comments and Responses



1 INTRODUCTION & BACKGROUND

The site is located at 1667 Davis Street in the City of Camden, Camden County, New Jersey and is described as Lot 33, Block 1392 by the City of Camden for tax purposes. It is in the Whitman Park neighborhood of Camden, NJ on an irregularly-shaped parcel, approximately 3.9 acres in area.

The City has contracted Brownfield Redevelopment Solutions, Inc. (BRS), to prepare this Analysis of Brownfields Cleanup Alternatives (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 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 ABCA and the Decision Memo will be included with the Administrative Record. The Administrative Record repository is located at the offices of the City.

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 3.9 acre property was originally developed in the early 1920's as hospital for contagious diseases. In the 1950's the facility was transformed into the South Jersey



Medical Research Foundation Laboratory as the home for the Coriell Institute for Medical Research (CIMR). The original hospital buildings were subsequently demolished and the laboratory buildings currently located on site were built in various phases between the 1950's to 1980's.

The site was purchased by Camden Laboratories, LP, in 1989 and then operated as a series of medical laboratories including "Viro-Med Biosafety" and "Quality Bio-tech" until at least 2007. The site was vacant after 2008.

The site currently consists of approximately 102,000 SF of asphalt-paved parking areas and a vacant compound of institutional buildings. The 22,000 SF building compound consists of contiguous one and two story structures with a partial basement. The structures are in extremely poor condition and have been subject to vandalism and illegal dumping. The remaining portions of the site consist of unpaved areas.

1.2 Surrounding Land Use

The surrounding area is predominantly residential with areas of industrial and commercial development to the east. In addition, the site is bounded to the east by the Dr. Charles E. Brimm Medical Arts High School and to the south and east by Whitman Park, including a recreational playground and ballfield.

1.3 Project Goal (Reuse Plan)

The redevelopment of the property will be for open public space and recreational ballfields. Prior to redevelopment, the City must remediate the property to make it fit for reuse. If awarded, these grant funds will be used to remediate the remaining areas of concern, including the existing septic system and a portion of the site that has historical evidence of a mercury spill.

1.4 Summary of Environmental Conditions

The site is currently an active case with the New Jersey Department of Environmental Protection (NJDEP) Site Remediation Program (SRP) with Program Interest (PI) No. 016718 and has been subject to multiple Site Investigations and Remedial Investigations under the oversight of the NJDEP since 1989. Most recently a Preliminary Assessment/Phase I Environmental Site Assessment, Quality Assurance Project Plan, and Remedial Investigation Workplan were completed in 2017. In 2018 it is anticipated that the buildings will be demolished with the wastes properly disposed of off-site. In addition, the property will be cleared and grubbed, and disturbed areas of the site will have topsoil and seed placed as part of the site restoration. Following this work the remaining areas of concern will include the septic system and historic evidence of a surface mercury spill.

Based on historical reports, there is a septic system in the northeast corner of the site. The septic system will not be used as part of the future development of the site. Therefore, the tank shall be properly abandoned in accordance with the Technical Requirements and appropriate guidance, regulations and practices. In addition, any impacts to subsurface

media shall be addressed by excavation and disposal, and/or installation of a cap and execution of a deed notice.

According to historical records, prior to 2004, a mercury surface spill occurred which resulted in concentrations exceeding the NJDEP residential direct contact soil remediation standard (RDCSRS). In addition, mercury impacted soil above the Impact to Ground Water Site Remediation Standard (IGWSRS) has extended into the saturated zone. Delineated subsurface media shall be addressed by excavation and disposal, and/or installation of a cap and execution of a deed notice. An indefinite term Classification Exception Area (CEA) will be established for the site to prevent future groundwater use.

1.5 Physical Setting

The Site is located at approximately 22 feet above mean sea level (MSL), and local topography slopes southeast. Surface soil at the site is classified by the Natural Resource Conservation Service (NRCS) as *Urban land*. Urban land soils are soils whose surface is covered by pavement, concrete, buildings, and other structures underlain by disturbed and natural soil material.

The subject area falls within the Magothy Formation of the Coastal Plain Physiographic Province. The Magothy Formation consists of fine to coarse-grained white sand and quartz that weathers yellow-brown to orange-brown. The Formation is interbedded with grey clay or dark grey clay-silt near the top, muscovite and feldspar are minor components, and wood fragments occur in many clay layers.

Based on a review of historic boring logs, the shallow subsurface is generally characterized by silty sands and clay with groundwater encountered at approximately 15 feet below ground surface.

No surface water bodies are present on or adjacent to the Site. The closest water body is the Cooper River, which is located approximately 0.5-miles east of the site and the local topography slopes to the southeast. Based on local topography and historic environmental reports the assumed direction of shallow groundwater flow is to the southeast.

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 by occasional on-site construction workers or trespassers. This exposure pathway will be mitigated immediately by implementation of the proposed cleanup activities, which includes excavation and offsite disposal of certain contaminated soils. Residual risk related to this pathway will be eliminated with engineering and institutional controls.
2. **Direct Contact with, or Ingestion of, Groundwater.** There are no current or anticipated future uses of onsite groundwater. In addition, an institutional control will be implemented to prevent future groundwater use.

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; and the Technical Requirements for Site Remediation, N.J.A.C. 7:26E. The most current versions of the NJDEP Technical Guidance documents will be referenced, including:

- *Capping of Sites Undergoing Remediation,*
- *Ground Water SI/RI/RA*
- *Soil SI/RI/RA*

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 Impact to Groundwater Soil Remediation Standard (IGWSRS).

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

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

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) No action,
Alternative No. 2) Targeted Remediation with Engineered Cap, and
Alternative No. 3) Site-wide Remediation.

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

- A. Effectiveness in providing compliance with NJDEP regulations and increased protectiveness to public health and the environment;
- B. Implementability of the considered alternative;
- C. Cost of the considered alternative; and
- D. Sustainability and resilience considerations.

3.1 Alternative No. 1 - No Action

If no environmental cleanup remedy were performed at this site:

- The site would remain out of compliance with NJDEP's regulations;
- The intended reuse of the site as open space and ballfields would not be possible.

3.1.1 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.

3.1.2 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.

3.1.3 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.

3.1.4 Operation and Maintenance

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

3.1.5 Institutional Controls

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

3.1.6 Cost

There would be no costs associated with this alternative.

3.2 Alternative No. 2 - Targeted Remediation with Engineered Cap

Under this alternative, the remedial action will include abandonment of the septic system and excavation of underlying contaminated soil, along with removal and disposal of mercury-impacted soil. This would be followed by installation of permeable and impermeable caps as an Engineering Control, recording of a deed notice and groundwater 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:

- Abandon/close existing septic system in accordance with regulations and address impacted soils. An estimated 550 tons of contaminated soil will be removed and disposed of off-site.
- An estimated 2,400 tons of mercury impacted soil will be removed and disposed of off-site.
- Groundwater encountered during soil removal will be pumped from the excavation cavity to an onsite holding tank for characterization analysis and disposal off-site.
- An engineered cap will be designed and installed to provide a barrier to the contaminants in site soils. Impermeable materials would include concrete or asphalt. Permeable materials would include imported clean soil or landscape material. A cap would be installed in areas where soil contaminants remain at concentrations above NJDEP non-residential soil remediation standards.
- Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility. The tasks will also include post-excavation sampling and analysis, and the emplacement of clean backfill.
- 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 caps will be performed.
- The Institutional Controls will consist of a deed notice attached to the deed in perpetuity. The deed notice will provide notice of the contaminants and the concentrations that were left in place, and controlled by the cap. In addition, an indefinite duration groundwater Classification Exception Area (CEA) will be established to prohibit groundwater use on the site.

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

3.2.1 Effectiveness

The Institutional and Engineering Controls approach does not physically remove all site soil and groundwater contaminants. However, this alternative would effectively achieve project remediation goals by:

- Achieving technical and administrative compliance with the NJDEP site remediation regulations.
- Disruption of the pathway of contaminated soils to the outside environment. Although the contamination still exists, the cap and CEA will significantly reduce the potential of human exposure.
- Providing notice of site environmental conditions to future site owners, occupants, and the general public by means of the Deed Notice.

3.2.2 Sustainability and Resilience

This criterion evaluates the degree to which the remedial alternative may reduce greenhouse gas discharges, reduce energy use, employ alternative energy sources, reduce volume of wastewater to be disposed, reduce volume of materials to be taken to a landfill, and/or allow for the reuse or recycling of materials during cleanup is considered, where applicable.

This alternative limits the excavation of site soil and transport by truck to offsite disposal facilities, thereby reducing the fossil fuel energy use, and associated greenhouse gas discharges associated with that task.

3.2.3 Implementability

Abandonment of the septic system is easily and rapidly implementable because it involves relatively simple technology and equipment. Removal of mercury impacted soil is a conventional means of addressing this type of contaminant. Cap placement as a type of remedy is a widely used and accepted practice for remediating 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 and CEA, prepared in accordance with NJDEP guidance and template, are relatively routine administrative submissions.

3.2.4 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).

3.2.5 Institutional Controls

This alternative will require the following Institutional Controls:

- A Deed Notice is required because contaminants above the RDCSRS are expected to remain below the soil 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 7:26E-6.1(B).
- All required NJDEP permits, reporting, and inspection requirements.
- A CEA for groundwater.

3.2.6 Cost

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

- 1) Retain environmental engineering firm and LSRP, and LSRP review of previous reporting;
- 2) Project and Grant Management tasks, including public notification;
- 3) Prepare project specifications and bid documents;
- 4) Conduct procurement process;
- 5) Procurement and testing of clean fill cap materials;
- 6) Abandonment of septic system and removal of approximately 550 tons of impacted soil;
- 7) Removal of approximately 2400 tons of mercury impacted soil;
- 8) Installation of engineered cap;
- 9) Site restoration, including vegetative cover;
- 10) Prepare Deed Notice;
- 11) Prepare Soil Remediation Permit;
- 12) Prepare Remedial Action Report and other regulatory reporting requirements;
- 12) Prepare Quality Assurance, and Health and Safety deliverables.

The estimated cost for this cleanup alternative is \$606,400. The USEPA cleanup grant contribution would be \$200,000. The City cost share would provide the remaining \$406,400 from other funding sources.

3.3 Alternative No. 3 – Site-wide Remediation

Under this alternative, the remedial action will consist of removal of the septic system and mercury impacted soil. Approximately 4,100 tons of impacted soils will be removed, disposed of off-site, and replacement with clean fill. Groundwater encountered during soil removal will be pumped from the excavation cavity to an onsite holding tank for characterization analysis and disposal off-site.

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.

3.3.1 Effectiveness

This alternative would be immediately effective by removal of the potential continuing contaminant sources associated with the septic system and the mercury “hot spot”. The remedial action should result in unrestricted use of the site.

3.3.2 Sustainability and Resilience

The site-wide remediation alternative compares unfavorably to Alternative 2 (described in Section 3.2) 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 2 in resilience metrics, such as the continuing protectiveness of the remedy in light of reasonably foreseeable changing climate conditions.

3.3.3 Implementability

This alternative is feasible and implementable. This approach will involve the work elements described in Section 3.2, with the exception of the emplacement of a clean soil cap, deed notice, and CEA, plus these additional elements:

- 1) Removal of the septic system and excavation of impacted soils
- 2) Backfill of the all excavated areas with clean soil fill.

3.3.4 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.

3.3.5 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 mercury impacted soil is the reason that a groundwater CEA is required under other scenarios, a CEA would not be required if the mercury impacted soil is removed from the site.

3.3.6 Cost

To implement this strategy, the septic system would be fully removed and a total of approximately 4,100 tons of soil would be excavated, disposed, and replaced with clean fill. Total project costs for this alternative are estimated at \$903,030.

3.4 Preferred Alternative

The preferred alternative is Alternative No. 2 - Targeted Remediation with Engineered Cap. Septic system abandonment and soil excavation is a proven method, easily and

quickly implementable, environmentally effective, and cost-effective. Excavation equipment is readily available. Soil excavation, along with implementation of a groundwater CEA, is accepted by the NJDEP as a remedy for mercury impacted soil. This remedy can be readily completed within the timeframe of the USEPA Brownfields Grant.

DRAFT

Attachment A
Site Location Map





PRO-BUILD
1386 - 1.01

RF PRODUCTS
1386 - 1

PHIL MAR
1388-7

CAMDEN LABS
1382-33

RF PRODUCTS, PHIL-MAR AND CAMDEN LABS
CAMDEN, NEW JERSEY





ATTACHMENT 3.3

-

**THRESHOLD
ELIGIBILITY:
COMMUNITY
NOTIFICATION**

COURIER-POST

NOV 13 2017

P.O. Box 5300
Cherry Hill, N.J. 08034

Agency:

CAMDEN REDEVELOPEMENT AGENCY
CAMDEN REDEVELOPEMENT AGENCY
520 MARKET ST STE 1300
CAMDEN, NJ 08102
ATTN: SULENA ROBINSON-RIVERA

Client:

CAMDEN REDEVELOPEMENT AGENCY
520 MARKET ST STE 1300,
CAMDEN, NJ 08102

Acct No: CHL-087266

Acct: CHL-087266

Order #	Advertisement/Description	# Col x # Lines	Rate Per Line	Cost
0002507615	BROWNSFIELD GRANT APP PUBLICNOTICEUSENVIROMENTALPROTECTION AGENCYBROWNFIEI DSGRANTAPPLICATIONTHEF	1 col x 39 lines	\$0.45	\$17.16
		Affidavit of Publication Charge	1	\$30.00
		Tearsheet Charge	0	\$0.00
		Net Total Due:		47.16

Run Dates: 11/02/17

Check #: _____

Date: _____

CERTIFICATION BY RECEIVING AGENCY
I, HAVING KNOWLEDGE OF THE FACTS, CERTIFY AND DECLARE THAT THE GOODS HAVE BEEN RECEIVED OR THE SERVICES RENDERED AND ARE IN COMPLIANCE WITH THE SPECIFICATIONS OR OTHER REQUIREMENTS, AND SAID CERTIFICATION IS BASED ON SIGNED DELIVERY SLIPS OR OTHER REASONABLE PROCEDURES OR VERIFIABLE INFORMATION.

SIGNATURE: _____

TITLE: _____ DATE: _____

CERTIFICATION BY APPROVAL OFFICIAL
I CERTIFY AND DECLARE THAT THIS BILL OR INVOICE IS CORRECT, AND THAT SUFFICIENT FUNDS ARE AVAILABLE TO SATISFY THIS CLAIM. THE PAYMENT SHALL BE CHARGEABLE TO:
APPROPRIATION ACCOUNT(S) AND AMOUNTS CHARGED: P.O. # _____

SIGNATURE: _____

TITLE: _____ DATE: _____

CLAIMANT'S CERTIFICATION AND DECLARATION:
I DO SOLEMNLY DECLARE AND CERTIFY UNDER THE PENALTIES OF THE LAW THAT THIS BILL OR INVOICE IS CORRECT IN ALL ITS PARTICULARS; THAT THE GOODS HAVE BEEN FURNISHED OR SERVICES HAVE BEEN RENDERED AS STATED HEREIN; THAT NO BONUS HAS BEEN GIVEN OR RECEIVED BY ANY PERSON OR PERSONS WITHIN THE KNOWLEDGE OF THIS CLAIMANT IN CONNECTION WITH THE ABOVE CLAIM; THAT THE AMOUNT HEREIN STATED IS JUSTLY DUE AND OWING; AND THAT THE AMOUNT CHARGED IS A REASONABLE ONE.

Date: 11/02/2017

Signature: Sandy Rasmel

Federal ID #: 061032273

Official Position: Clerk

Kindly return a copy of this bill with your payment so that we can assure you proper credit.

AFFIDAVIT OF PUBLICATION

Publisher's Fee \$17.16 Affidavit \$30.00

State of New Jersey } SS.
Camden County

Personally appeared Sandy Karmel

Of the **Courier Post**, a newspaper printed in Cherry Hill, New Jersey and published in Cherry Hill, in said County and State, and of general circulation in said county, who being duly sworn, deposeth and saith that the advertisement of which the annexed is a true copy, has been published in the said newspaper 1 times, once in each issue as follows:

11/02/17 A.D 2017

Mary Jo Szwak
Notary Public of New Jersey
Ad Number: 0002507615



Public Notice

US Environmental Protection
Agency
Brownfields Grant Application

The City of Camden is applying for US Environmental Protection Agency (EPA) Brownfields Grants to assess and clean up sites in the City of Camden. In accordance with EPA's community notification policies, a community meeting is being held to discuss the grant applications and to solicit public comments on the applications and the proposed use of funds. The meeting will be held on Thursday November 9, 2017 at 1:00pm at Camden City Hall, 13th Floor Conference Room, 520 Market Street, Camden. Copies of the grant applications, including the draft EPA-required Analysis of Brownfield Cleanup Alternatives documents that are part of the applications, will be available for public review and comment in the CRA's office during normal business hours. For more information on reviewing the grant proposals or the meeting, contact James Harveson of the Camden Redevelopment Agency at 856-757-7600 or Cailean Kok of BRS, Inc. at 856-964-6456, ext. 6854.

(\$17.16)

**City of Camden Redevelopment Agency
And
City of Camden
US Environmental Protection Agency
Brownfields Grant Applications
Public Meeting Minutes**

**Camden City Hall, 13th Floor
520 Market Street, Camden, NJ 08102
November 9, 2017 1:00-2:00 PM**

Meeting Host: City of Camden Redevelopment Agency and City of Camden

Discussion

James Harveson for the City of Camden Redevelopment Agency (CRA) was available to provide attendees with information regarding the Agency's US Environmental Protection Agency brownfields grant applications due November 16th. The City of Camden is submitting cleanup grant applications for the Camden Labs site and the 7th and Kaighn site.

No attendees were present in addition to Mr. Harveson, and therefore no comments were received regarding the EPA Brownfields grant applications.

The meeting adjourned at 2:00pm.