

OCT - 4 2010

PERKS-REUTTER ASSOCIATES

*State of New Jersey*

CHRIS CHRISTIE
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Southern Field Operations
401 East State Street
P.O. Box 420
Trenton, NJ 08625-0420
Phone #: 609-633-1475
Fax #: 609-984-6004

BOB MARTIN
Commissioner

KIM GUADAGNO
Lt. Governor

September 30, 2010

Saundra Ross Johnson, Executive Director
City of Camden
Camden Redevelopment Agency
520 Market Street, Suite 1300
Camden, NJ 08101

Re: **No Further Action Letter**

Remedial Action Type: Unrestricted Use for Ground Water
North Front Street Associates (a.k.a. ABC Barrel Co.)
308 to 322 North Front Street
Camden City, Camden County
Program Interest #: 006594
Activity Number: BFO000001
Document Title: ABC Barrel Co 950914120653
Communications Center Number: 95-09-14-1206-53
BFO File Number: 04-08-58
Block: 62 and Lots: 38 & 44
Well Permit #s: P200801109 & P200801110

Dear Ms. Ross Johnson:

Pursuant to N.J.S.A. 58:10B-13.1 and N.J.A.C. 7:26C, the New Jersey Department of Environmental Protection (Department) issues this No Further Action Letter for the remediation of the ground water specifically referenced above, so long as the City of Camden-Camden Redevelopment Agency did not withhold any information from the Department. This action is based upon information in the Department's case file and the City of Camden-Camden Redevelopment Agency's final certified report dated March 4, 2009. In issuing this No Further Action Letter, the Department has relied upon the certified representations and information provided to the Department. To remain in compliance with the terms of this No Further Action Letter, the City of Camden-Camden Redevelopment Agency as well as each subsequent owner, lessee and operator must comply with the conditions noted below.

By issuance of this No Further Action Letter, the Department acknowledges the completion of a Preliminary Assessment, Site Investigation, Remedial Investigation and Remedial Action pursuant to the Technical Requirements for Site Remediation (N.J.A.C. 7:26E) for the ground water beneath the site and no other areas.

By operation of law a Covenant Not to Sue pursuant to N.J.S.A. 58:10B-13.1 applies to this remediation. The Covenant Not to Sue is subject to any conditions and limitations contained herein. The Covenant Not to Sue remains effective only as long as the real property referenced above continues to meet the conditions of this No Further Action Letter.

NO FURTHER ACTION CONDITIONS

Pursuant to N.J.S.A. 58:10B-12o, the City of Camden-Camden Redevelopment Agency and any other person who was liable for the cleanup and removal costs, and remains liable pursuant to the Spill Act, shall inform the Department in writing within 14 calendar days whenever its name or address changes. Any notices submitted pursuant to this paragraph shall reference the above case numbers and shall be sent to: Bureau of Case Assignment and Initial Notice – Case Assignment Section, P.O. Box 434, Trenton, N.J. 08625-0434.

The City of Camden-Camden Redevelopment Agency as well as each subsequent owner, lessee and operator (collectively Successors) shall comply with each of the following:

Well Decommissioning

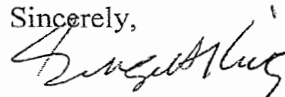
Pursuant to N.J.S.A. 58:4A, the City of Camden-Camden Redevelopment Agency shall properly decommission all monitoring wells installed as part of a remediation that will no longer be used for ground water monitoring. A New Jersey licensed well driller shall decommission the wells in accordance with the requirements of N.J.A.C. 7:9D-3.1 (et seq.). After the well has been decommissioned by a New Jersey licensed well driller, the well driller is required to submit a copy of the decommissioning report on your behalf to the Bureau of Water Systems and Well Permitting. Please note that only a New Jersey licensed well driller may perform this work. More information about regulations regarding the maintenance and decommissioning of wells in New Jersey can be found at <http://www.nj.gov/dep/watersupply>. For a list of New Jersey licensed well drillers, click on the "reports" button in the left column and select "access the well permit reports." Questions can be emailed to wellpermitting@dep.state.nj.us.

NOTICES

This No Further Action Letter is for ground water only located beneath the referenced site. The Department has relied, in part, on the reported ground water data to support that soil contamination still present on the site is no longer affecting the ground water located beneath the site. Please be advised that if changes in future ground water data no longer support this conclusion, the Department reserves its rights to require additional ground water investigation and/or remediation.

Thank you for your attention to these matters. If you have any questions, please contact Cheryl Priest at (609) 292-2723.

Sincerely,



George King, Bureau Chief
Bureau of Southern Field Operations



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State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Southern Field Operations

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Mail Code 401-05

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CHRIS CHRISTIE

Governor

KIM GUADAGNO

Lt. Governor

FEB - 1 REC'D

BOB MARTIN

Commissioner

January 24, 2012

Sandra Ross Johnson, Executive Director
Camden Development Agency - City Hall
520 Market Street, Suite 1300
PO Box 95120
Camden, NJ 08101

Approval

Re: Remedial Action Work Plan and New Jersey Pollutant Discharge Elimination System/Discharge to Ground Water Permit-By-Rule Request
North Front Street Associates (a.k.a. ABC Barrel Co. & AABCO Steel Drum Site)
308 - 322 North Front Street
Camden City, Camden County
Block 62.01; Lots 1 to 4
Block 62; Lots 17 to 20
Block 62.02; Lots 25 & 26
Block 65; Lots 38 & 45
SRP PI#: 006594
EA ID #: SUB110001
BFO File Number: 04-08-58

Dear Ms Ross Johnson:

The New Jersey Department of Environmental Protection (Department) has completed review of the Remedial Action Work Plan received on November 16, 2011. The Department has determined that the Remedial Action Work Plan is in compliance with the Technical Requirements for Site Remediation, N.J.A.C. 7:26E and other applicable requirements. The Department hereby approves the Remedial Action Work Plan, effective the date of this letter.

This New Jersey Pollutant Discharge Elimination System/Discharge to Ground Water (NJPDES/DGW) permit-by-rule discharge approval is hereby issued under the authority of the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq. and the implementing regulations, N.J.A.C. 7:14A-1 et seq. Pursuant to N.J.A.C. 7:14A-22.4(b)5, a Treatment Works Approval is not

required for discharges to ground water authorized pursuant to N.J.A.C. 7:14A-7.5(b) and contained in this letter. Be advised that the time period for the discharge begins on the day the discharge first occurs, not on the date the discharge approval letter is issued or received.

Consistent with N.J.A.C. 7:14A-7.5(b)3 the approved discharge to ground water is related to dewatering at a contaminated site or regulated underground storage tank facility and is not to exceed 180 calendar days.

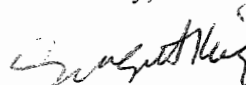
Please be aware that on May 7, 2009 the Site Remediation Reform Act (SRRA) was enacted. SRRA establishes criteria for the licensing of site remediation professionals, known as LSRP's, who will assure that contaminated sites are remediated in accordance with all prevailing statutes, regulations and guidance. The timeframes and criteria that define when a LSRP must be hired, as well as other requirements of SRRA have been reflected in the ARCS Rule and Tech Rule adopted on November 4, 2009. These rules can be found at <http://nj.gov/dep/srp/regs/>. All parties who initiated remediation prior to November 3, 2009 will not be required to hire a LSRP to conduct the remediation right away. Remediation will follow the remediation process with traditional NJDEP oversight and approvals until 2012. All parties remediating sites on or after May 7, 2012 will be required to follow N.J.S.A. 58:10B-1.3b 1-9 and hire an LSRP.

Please be advised that based upon the Department's review of your file, it is our opinion that the remediation will not be completed, reports submitted and evaluated for this site before the May 7, 2012 deadline. Therefore it will be necessary for you to complete the remediation under the LSRP program. Information regarding opting into the LSRP program can be found at http://www.nj.gov/dep/srp/srra/lrsp/opt_in.htm.

It is important to note that there are regulatory and mandatory timeframes that started March 1, 2010 that may apply to this site. Guidance for this topic can be found at http://www.nj.gov/dep/srp/srra/training/matrix/new_responsib/6_timeframe_req.pdf. Your failure to meet a mandatory timeframe will subject you to direct oversight pursuant to N.J.S.A. 58:10c-27.

Thank you for your cooperation in this matter. If you have any questions, call Cheryl Priest at (609) 292-2723.

Sincerely,



George King, Bureau Chief
Bureau of Southern Field Operations

cc: Clerk, Camden City
Camden County Health Department
Dresdner Robin
BFO File Number: 04-08-58