#### COMMUNITY RELATIONS PLAN

# City of Trenton, New Jersey Former Federate Metals Facility- 300 Enterprise Avenue Block 23102, Lot 9 Environmental Protection Agency Brownfields Cleanup Grant Cooperative Agreement Nos. BF96265517

#### **Overview**

This Community Relations Plan (CRP) was prepared by Brownfield Redevelopment Solutions, Inc. for the City of Trenton (the City). The City is committed to facilitating the redevelopment and reuse of the Site known as the Former Federated Metals Facility in Trenton, and is described in detail below. Identification and remediation of environmental issues is a key factor in preparing the site for reuse.

The Site is located at 300 Enterprise Avenue in Trenton, Mercer County, New Jersey (the Site). It is approximately 1.1 acres in area (triangular shaped) and it is identified on the City of Trenton tax maps as Block 23102, Lot 9. The CRP is particularly aimed at the informational needs of City residents who are potentially directly affected by the proposed cleanup action and redevelopment of the property.

The CRP and the activities described herein are intended to comply with:

- 1) The Notification and Public Outreach regulations and guidance of the New Jersey Department of Environmental Protection (NJDEP), which provides regulatory oversight to the project, as found in N.J.A.C. 7:26C-1.7.
- 2) The Community Relations and Public Involvement requirements of the governing cooperative agreement.

The CRP is prepared in accordance with EPA guidance<sup>1</sup> and the governing EPA Cooperative Agreements. The CRA is primarily responsible for implementing community relations pertaining to the site.

# **Spokesperson and Information Repository**

The spokesperson for this project is:

Mr. J.R. Capasso
Brownfields Coordinator
Division of Economic Development
Department of Housing and Economic Development
City of Trenton
319 East State Street
Trenton, New Jersey 08608
Tele: (609) 989 3501/Fax: (609) 989 4243

<sup>1</sup> "Guidelines for Brownfields Cleanup Grants," EPA-OSWER-OBLR-12-09 (EPA, 2012).

The administrative record file/information repository is located at the City of Trenton Brownfields Coordinator Office and is available to review by appointment during business hours. Mr. Capasso may be contacted at (609) 989-3501 to schedule a review of the file.

The information repository includes the following documents related to environmental assessment and remediation of the project site:

- Community Relations Plan (CRP)
- Documentation of Public Outreach
- Environmental Assessment Reports
- Site-Wide Remedial Action Workplan
- EPA Brownfields Cleanup Grant Applications

## **Site Description and History**

The Former Federate Metal Facility was divided into two (2) individual opposing parcels of land on the southeast and northwest sides of Enterprise Avenue, known as Parcel A and Parcel B. The Site, which is the subject of this CRP is also referred to as Parcel A, and is referenced on the Tax Maps, City of Trenton, sheets 230 and 231.

The surface elevation at the Site ranges from approximately 48 feet above mean sea level (msl) and slopes very gently downwards to the southeast to approximately 47 feet above msl. The nearest surface water body is the Assunpink Creek, which is located approximately 200 feet to the southeast of the Site.

The Site was utilized primarily by Federated Metals Corporation and American Smelting & Refining Company for the refining of secondary metals to produce metallic zinc dust from approximately 1925 until operations were ceased in August 1980. The buildings were demolished in April 1995 and the lot was subsequently used for the collection and storage of demolition and construction debris until 2002, after which the lot remained undeveloped and vacant.

#### Nature and Threats to Public Health and the Environment

Environmental investigation determined historic fill material area ("Historic Fill" is material contaminated with hazardous substances prior to emplacement that was used to raise site elevations) were encountered at the Site below surface concrete slabs to a maximum depth of 9 feet below surface. The fill materials consisted of silt, gravel, cinders, ashes, and pieces of brick and rock. Weathered bedrock was encountered at Site at depths ranging from 22 feet to 29 feet below ground surface (ft bgs). Preremedial environmental investigation conducted at the site indicates the presence of elevated concentrations of hazardous substance contaminants PAHs and PCBs in soil at levels consistent with historic fill found in the Trenton area. "Hot spot" areas containing elevated concentrations of lead and PCBs were also identified.

The results of EnviroSure site specific Impact to Groundwater (ssIGW) sampling and analysis focus on the soil to groundwater pathway and that proposed remediation actions, including Engineering Controls and Institutional Controls. These will provide protection from exposure via direct contact pathways. The remediation will include emplacement of partial caps and a fence, ongoing maintenance of the cap, fulfillment of the regulatory reporting requirements and the establishment of institutional controls, including a deed notice. A sign is posted which informs the community that environmental remediation to was to occur on the site.

Pre-remedial environmental investigation conducted at the site in from 2001-2012 indicates hazardous substance contamination in historic fill material, which is characterized by elevated concentrations of metals and base neutral compounds in soil at levels consistent with historic fill found in the Trenton area. Other "hot spot" areas containing elevated concentrations of metals and PCBs were also identified.

The remediation will consist of the removal and proper disposal of "hot spot" areas and installation of an engineering control, a partial cap and a fence, to provide an approved barrier to eliminate exposure to contaminated soil permitted to remain on site. A deed restriction will be placed on the property documenting this cap and restricting the site development to non-residential development.

## **Community Profile**

The City has a rich industrial heritage that has left a legacy of numerous abandoned buildings on contaminated property, surrounded by densely populated, low income, minority neighborhoods. To the northeast and east of block 23102, lot 9 is a vacant 3.75-acre vegetated lot owned by the City of Trenton, beyond which is the Assunpink Creek. The vegetated lot was the location of the former Cordey China Company, which manufactured artware, earthenware, table and kitchenware, statuary lamps, porcelain, ceramics, and giftware over an approximate 37-year history. In 1984, Princeton Commerce Center, Inc., purchased the property and demolished the buildings. The site was then paved and used as a parking lot since that time.

To the south of block 23102, lot 9 is an active rail line (the Millham Branch Railroad Spur) owned by Conrail, beyond which is the Former Wenczel Tile facility. The Former Wenczel Tile facility manufactured ceramic tiles and pottery from as far back as the 1930's or 1940's.

The planned remediation will remove or contain contamination and exposure pathways that potentially threaten the adjacent residents and other sensitive receptors.

### **Chronology of Community Involvement**

In Trenton, redevelopment begins with the community. The end use of a property is determined by the needs of the community, and development occurs with the input and involvement of the community. Trenton has numerous civic groups, religious organizations, and community development corporations which become actively involved in brownfield redevelopment.

The USEPA grant proposals for the Site, which describes existing conditions, community impact and proposed solutions, was developed in an open manner with input and involvement of numerous community groups. The applications were discussed by City officials at public meetings including the Brownfields Environmental Solutions for Trenton Advisory Group (BEST), a brownfield stakeholder committee that has been meeting regularly since 1996.

Announcements describing the applications and inviting public comment in both English and Spanish were placed in the two major local papers as well as on the City web site, <a href="https://www.trentonnj.org">www.trentonnj.org</a>, and the draft applications and draft Analysis of Brownfield Cleanup Alternatives were available for public review and comment:

Prior to remediation construction, specific community notification is required. The City of Trenton will ensure compliance with state public notification requirements. Signs will be erected at the site to notify the public of the environmental work in progress on the site and provide contact information for responsible agencies in the event that any issues or questions arise regarding the work. As part of the public involvement, the City of Trenton also identifies those sensitive populations around the site, and will provide public notification (both English and Spanish language signage) regarding any investigation or cleanup activities to all sensitive populations, owners, and tenants within 200 feet of the site through letters or neighborhood signage.

By preparing and implementing this Community Relations Plan, the City of Trenton has also ensured compliance with EPA's requirements.

# **Key Community Concerns**

The Site is being investigated and remediated through the New Jersey Licensed Site Remediation Professional (LSRP) program. Upon completion of the remedial action the LSRP will issue a Remedial Action Outcome (RAO) letter indicating that the risk based standards set out by the State have been met. Receipt of the RAO will certify that the LSRP provided oversight of the cleanup, determined that the completed remediation was complied with all applicable laws and regulations and will be deemed protective of human health and the environment. The City will work with the LSRP to ensure that the selected site remedy will address any contamination identified in order to be protective of human health and the environment by eliminating any exposure pathways.

To ensure that no adverse environmental impact occurs during the actual cleanup, as needed, air monitoring will be conducted, dust suppression measures will be implemented and sediment erosion controls will be put in place.

The City of Trenton will continue to work with the community regarding the remediation and redevelopment of the Former Federate Meatal Facility by attending local community meetings as well as meeting with community leaders to ensure the public is aware of the remediation and has the opportunity to raise any concerns during the implementation of the workplan. The designated contact person, City of Trenton's Brownfield Coordinator, will continue to be available to answer any questions citizens or reporters may have as activities progress at the site. The information repository will continue to be updated with the inclusion of all meeting minutes, status reports and other documents as appropriate.

## **Benefits to Targeted Community**

The environmental remediation projects for the Former Federate Metal Facility will benefit the target community in meaningful ways. The benefits of the grant and resultant redevelopment extend to not only the adjacent community, but also to the entire City of Trenton and to the environment overall, as this is part of a regional park and trail system, and located on a sensitive, impacted stream. The Former Federate Metal Facility Project will increase open space and create a link between neighborhoods, places of work and recreation and historic sites. The project will provide a corridor for wildlife migration, as well as provide scenic value and recreational opportunity in this distressed section of Trenton.

Remediating the environmental impact present at Parcel A will allow for additional acreage to be added to the Enterprise Avenue site, and will allow for the existing rail spur to be brought onto the Enterprise property, thus making the entire site more marketable for commercial and light industrial purposes.

#### **Continued Community Involvement**

The City of Trenton will continue to seek community input as the project progresses. Any significant changes to development agreements, permits, or remediation plans will be discussed at the City Council meetings and will be are advertised on the City of Trenton website, which also includes an archive of previous meeting agenda, resolutions, and minutes. Any changes will also be documented in the administrative record file.

The City of Trenton will maintain the administrative record file to reflect the status of the cleanup, public comments, response to public comments, and other significant decisions regarding environmental remediation. And, of course, a public ribbon cutting will occur at the newly improved Former Federate Metal Facility upon completion of the project for the neighborhood, project participants and area citizens to celebrate a successful community endeavor.