

22 July 2019

Mr. Thomas Catapano
NJ Economic Development Authority
36 West State Street / PO Box 990
Trenton, NJ 08625-0990

**Re: This correspondence amends and supplements the Response Action Outcome dated
17 April 2018**

Remedial Action Type: Restricted Use with Permit Requirements

Scope of Remediation: Areas of Concern:

AOC A – diesel fuel oil AST

AOC B-1 – 20,000-gallon heating oil UST

AOC B-2 & B-3 – two former unleaded gasoline USTs, associated piping, and dispenser island

AOC B-4 – former 550-gallon waste oil UST and associated piping

AOC B-5 – 2,500-gallon diesel fuel UST

AOC C – drum storage area

AOC D – floor drains

AOC E – Historic Fill

AOC F – electric transformers

AOC G – boiler room

AOC H – air vents

AOC I – hydraulic oil in elevator control unit

AOC J – monitoring wells, and

AOC K – former oil/water separators and no other areas

Case Name: Former Riverfront State Prison

Address: Delaware Avenue and Elm Street

Municipality: Camden

County: Camden

Block: 79 **Lot:** 13

Preferred ID: 015986

Communication Center # 95-03-29-0952-53, 01-08-24-1319-54, 01-08-09-1854-29, 10-08-13-1534-49

UST Registration #: 01598601, 0159865A

UST Closure # N00-0975, N04-2908, N10-7208

Well Permit # 3100075292, E201410568, E201410569, E201410570

Dear Mr. Catapano:

This correspondence amends the Response Action Outcome issued on **17 April 2018**, which remains in full force and effect, by correcting the following administrative errors:

1. Well permit # 3100075292, E201410568, E201410569, and E201410570 were missing from the original Response Action Outcome. They are now included in the Scope of Remediation.
2. Communication Center # 01-08-09-1854-29 and 01-08-24-1319-54 were missing from the original Response Action Outcome. They are now included in the Scope of Remediation.
3. UST Closure # N00-0975 was missing from the original Response Action Outcome. It is now included in the Scope of Remediation.

4. The second paragraph of the original Response Action Outcome read:

This remediation includes the completion of a Preliminary Assessment, Site Investigation, Remedial Investigation, and Remedial Action as defined pursuant to the Technical Requirements for Site Remediation (N.J.A.C. 7:26E).

Has been changed to:

This remediation includes the completion of a Site Investigation, Remedial Investigation, and Remedial Action as defined pursuant to the Technical Requirements for Site Remediation (N.J.A.C. 7:26E).

5. The fourth paragraph of the original Response Action Outcome read:

By operation of law a Covenant Not to Sue pursuant to N.J.S.A. 58:10B -13.2 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 Response Action Outcome.

Has been changed to:

By operation of law a Covenant Not to Sue pursuant to N.J.S.A. 58:10B -13.2 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 Response Action Outcome and applicable permits.

6. Under the "Conditions" section, the following text has been inserted after the NJDEP notification address:

Any such name or address change may also trigger a transfer or modification of the remedial action permit pursuant to N.J.A.C. 7:26C-7.11 and 7.12.

7. Under the "Notices" section, the first sentence of the *Ground water Contamination due to Regional Historic Fill* notice read:

Please be advised that ground water contamination (specifically 2-methylnaphthalene, naphthalene, phenanthrene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, cyclohexane, aluminum, arsenic, iron, manganese, and sodium) at this site exists above

the Ground Water Quality Standards (N.J.A.C. 7:9C) which may limit ground water use at this site.

Has been changed to:

Please be advised that ground water contamination (specifically arsenic) at this site exists above the Ground Water Quality Standards (N.J.A.C. 7:9C) which may limit ground water use at this site.

Please be advised this correspondence, with the above amendments and supplements, corrects administrative errors identified in the original Response Action Outcome issued on **17 April 2018**. This correspondence should be attached to the original Response Action Outcome and be maintained as part of your environmental records for the above reference site.

Thank you for your attention to these matters. If you have any questions, please contact me at (973) 560-4985.

Sincerely,

Langan Engineering and Environmental Services, Inc.



Brian A. Blum, CPG

Licensed Site Remediation Professional # 573990

CRB/BAB:mf:hc

Attachment: Original Response Action Outcome

Cc: Mayor, City of Camden
Municipal Clerk and Registrar, City of Camden
Department of Human Services
County Health Officer/Public Health Coordinator
NJ Department of Children and Families
NJDEP – BIR (Electronic Copies Only)

NJ Certificate of Authorization No: 24GA27996400

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ATTACHMENT A

Response Action Outcome dated 17 April 2018

17 April 2018

Mr. Thomas Catapano
NJ Economic Development Authority
36 West State Street / PO Box 990
Trenton, NJ 08625-0990

Re: Response Action Outcome

Remedial Action Type: *Restricted Use with Permit Requirements*

Scope of Remediation: *Area(s) of Concern:*

*AOC A – diesel fuel oil AST
AOC B-1 – 20,000-gallon heating oil UST
AOC B-2 & B-3 – two former unleaded gasoline USTs, associated piping, and dispenser island
AOC B-4 – former 550-gallon waste oil UST and associated piping
AOC B-5 – 2,500-gallon diesel fuel UST
AOC C – drum storage area
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AOC E – Historic Fill
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AOC G – boiler room
AOC H – air vents
AOC I – hydraulic oil in elevator control unit
AOC J – monitoring wells, and
AOC K – former oil/water separators and no other areas*

Case Name: *Former Riverfront State Prison*

Address: *Delaware Avenue and Elm Street*

Municipality: *Camden*

Block: *79* **Lot:** *13*

Preferred ID: *015986*

Communication Center # *10-08-13-1534-49, 95-03-29-0952*

UST Registration # *01598601, 0159865A*

UST Closure # *N10-7208, N04-2308*

Dear Mr. Catapano:

As a Licensed Site Remediation Professional authorized pursuant to N.J.S.A. 58:10C to conduct business in New Jersey, I hereby issue this Response Action Outcome for the remediation of the *areas of concern* specifically referenced above. I personally reviewed and accepted all of the referenced remediation and based upon this work, it is my professional opinion that this remediation has been completed in compliance with the Administrative Requirements for the Remediation of Contaminated Sites (N.J.A.C. 7:26C), that is protective of public health, safety and the environment. Also, full payment has been made for all Department fees and oversight costs pursuant to N.J.A.C. 7:26C-4.

This remediation includes the completion of a *Preliminary Assessment, Site Investigation, Remedial Investigation and Remedial Action* as defined pursuant to the Technical Requirements for Site Remediation (N.J.A.C. 7:26E).

My decision in this matter is made upon the exercise of reasonable care and diligence and by applying the knowledge and skill ordinarily exercised by licensed site remediation professionals in good standing practicing in the State at the time these professional services are performed. As required pursuant to N.J.A.C. 7:26C-6.2(b)2ii, a copy of all records related to the remediation that occurred at this location is being simultaneously filed with the New Jersey Department of Environmental Protection (Department). These records contain all information upon which I based my decision to issue this Response Action Outcome.

By operation of law a Covenant Not to Sue pursuant to N.J.S.A. 58:10B -13.2 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 Response Action Outcome.

CONDITIONS

Pursuant to N.J.S.A. 58:10B-12o, The New Jersey Economic Development Authority (NJEDA) and any other person who is liable for the cleanup and removal costs, and remains liable pursuant to the Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq. shall inform the Department in writing, on a form available from the Department, within 14 calendar days after its name or address changes. Any notices you submit pursuant to this paragraph shall reference the above case numbers and shall be sent to:

New Jersey Department of Environmental Protection
Bureau of Case Assignment and Initial Notice
Mail Code 401-05H
401 East State Street, 5th floor
PO Box 420
Trenton, New Jersey 08625-0420

Based on my professional opinion you have obtained all applicable permit(s) and authorization(s) to ensure this remedial action remains protective of public health, safety and the environment into the future provided that you, and any other persons responsible for conducting remediation, remain in full compliance with the terms and conditions of those permit(s) and authorization(s). The designated remedial action permit number is RAP180001 effective April 11, 2018.

NOTICES

Well Decommissioning

Pursuant to N.J.A.C. 7:9D-3, all wells installed as part of this remediation have been properly decommissioned by a New Jersey licensed well driller of the proper class in accordance with the procedures set forth in N.J.A.C. 7:9D and the well driller's well decommissioning report has been submitted to the Bureau of Water Allocation and Well Permitting. Please note that one well(s) could not be located or properly decommissioned. Contact has been made with the Bureau of Water Allocation and Well Permitting regarding appropriate steps to document and conclude efforts in this regard.

Ground water Contamination due to Regional Historic Fill

Please be advised that ground water contamination (specifically 2-methylnaphthalene, naphthalene, phenanthrene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, cyclohexane, aluminum, arsenic, iron, manganese, and sodium) at this site exists above the Ground Water Quality Standards (N.J.A.C. 7:9C) which may limit ground water use at this site. It has been determined that this contamination is solely related to regional historic fill and there is no other onsite source of contamination contributing to this ground water contamination. Based on ground water data collected as part of this remediation and provided to the Department, a Classification Exception Area (CEA) pursuant to N.J.A.C. 7:26E-4.7(b) is required for the footprint of this property. Since this contamination is from regional historic fill only, the Department will maintain the Classification Exception Area and a Remedial Action Permit for this contamination is not required. The duration of this Classification Exception Area is for an "indeterminate" period.

Naturally Occurring Levels of Constituents in Ground Water

Please be advised that concentrations of aluminum, iron, manganese, and sodium were detected in the ground water at this site above the Department's Ground Water Remediation Standards (N.J.A.C. 7:26D-2). However, these concentrations are associated with naturally occurring levels of these constituent(s) in the ground water. Pursuant to N.J.S.A. 58:10B, remediation beyond naturally occurring levels is not required. Development or redevelopment on this site should take into consideration the potential for exposure to constituents that exceed the Ground Water Quality Standards (N.J.A.C. 7:9C)."

In concluding that this remediation has been completed, I am offering no opinions concerning whether either primary restoration (restoring natural resources to their pre-discharge condition) or compensatory restoration (compensating the citizens of New Jersey for the lost interim value of the natural resources) has been completed.

Pursuant to N.J.S.A. 58:10C-25, the Department may audit this Response Action Outcome and associated documentation up to three years following issuance. Based on a finding by the Department that a Response Action Outcome is not protective of public health, safety and the environment, the Department can invalidate the Response Action Outcome. Other justifications for the Department's invalidation of this Response Action Outcome are listed in the Administrative Requirements for the Remediation of Contaminated Sites at N.J.A.C. 7:26C-6, including, but not limited to, a Department audit following issuance of this document may be initiated at any time if: a) undiscovered contamination is found that was not addressed by the Response Action Outcome, b) if the Licensed Site Remediation Professional Board conducts an investigation of the Licensed Site Remediation Professional issuing the Response Action Outcome or, c) if the license of that person is suspended or revoked.

Thank you for your attention to these matters. If you have any questions, please contact me at (973) 560-4985.

Sincerely,

Langan Engineering and Environmental Services, Inc.



Brian A. Blum, CPG, LSRP 573990
Senior Associate

CRB/BAB:mf
Encls.

cc: Local, County Environmental Health Act Agency and Regional Health Department(s)
Mayor/Clerk/Town Council, City of Camden
Municipal Clerk
NJDEP Bureau of Case Assignment and Initial Notice

Case Name: Riverfront State Prison

PI #: 015986

IMPORTANT: 1) Do not delete or copy and paste across multiple columns because it can disrupt hidden equations.
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Case Inventory Document Version 1.4 02/23/17

AOC ID	AOC Type	AOC Description	Confirmed Contamination	AOC Status	Status Date	Incident #	DEP AOC Number	Contaminated Media	Contaminants of Concern	Additional Contaminants of Concern	Additional Contaminants of Concern	Applicable Remediation Standard	Exposure Route	Additional Exposure Route	RA Type	Additional RA Type	Additional RA Type	Was an Order of Magnitude Evaluation	Activity
A	Storage tank and appurtenance - Above ground storage tank	3,000 Gallon Diesel Fuel Oil AST	No	RAO-A (Restricted Use)	3/12/2018			None	Not Applicable									No	November 2010 - An inspection of the site determined that no investigation was required for this AOC. 2012 - The AST was removed from the site and properly disposed. March 2018 - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
B-1	Storage tank and appurtenance - Unregulated underground storage tank	20,000 Gallon Deisel Fuel UST	Yes	RAO-A (Restricted Use)	3/12/2018	10-08-13-1534-49		Soil	TPHC	BN		Remediation Standards			Excavation			No	April 2010 - Registered as Tank #E5 at the facility. NOI filed on 3/10/10 with TMS# N10-7208. The tank was removed and post excavation sampling was conducted. One soil sample (P-5), collected beneath the piping for the UST, contained naphthalene in excess of the Residential Direct Contact Soil Remediation Standard and 2-methylnaphthalene in excess of the Default Impact to Ground Water Screening Level. In addition, the sample contained TPH in excess of the NJDEP Residential Soil Remediation Standard of 5,100 mg/kg and the Ecological Screening Criterion of 1,700 mg/kg. Incident #10-08-13-1534-49 was called-in to the NJDEP Hotline. A CDN was submitted on 9/30/10. The October 2010 Site Investigation Report included a recommendation for a Remedial Investigation for soil and ground water at this AOC. September 2013 - A sample collected from the same location and depth as P-5 contained non-detect values for EPH, naphthalene, and 2-methylnaphthalene. In addition, no exceedances were found in horizontal delineation samples collected around the P-5 location. March 2015 - RIR/RAR - The RI is complete. The RA is complete. No further action is required. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
B-2	Storage tank and appurtenance - Unregulated underground storage tank	4,000 Gallon Unleaded Gasoline UST	Yes	RAO-A (Restricted Use)	3/12/2018	95-03-29-0952-53, 01-08-09-1854-29		Ground Water	VO			Remediation Standards			Excavation			No	March 1995 - Incident #95-03-29-0952-53 was called-in to the NJDEP Hotline regarding a release from the UST system. August 2001 - NOI was filed for UST designated as #E2 for the facility on 11/8/00. UST was removed on 8/8/01 under TMS #N00-0975 and post-excavation sampling was conducted. No evidence of contamination was found in soil in the tank excavation; however, evidence of a discharge was noted at the associated gasoline dispenser island. Incident #01-08-09-1854-29 was called-in to the NJDEP Hotline. December 2001 - Site Investigation Report - Post excavation samples contained no exceedances of the Soil Remediation Standards. A grab ground water sample collected from the open excavation at the dispenser island contained benzene in excess of the NJDEP Ground Water Quality Standards. March 2015 - RIR/RAR - A Remedial Investigation was conducted for soil and ground water. There were no exceedances of the Soil Remediation Standards. A grab ground water sample collected in September 2013 from a boring in the location of the former dispenser island (SB-7) contained no exceedance of benzene, but did contain exceedances of cyclohexane and VOC TICs. A ground water sample collected in September 2014 from a permanent monitoring well (MW-4) installed immediately downgradient of the dispenser island contained no VOC detections. The RI is complete. The RA is complete. No further investigation or remediation is required for this AOC. March 2018 - RAO - A restricted use RAO-A was issued
B-3	Storage tank and appurtenance - Unregulated underground storage tank	4,000 Gallon Unleaded Gasoline UST	Yes	RAO-A (Restricted Use)	3/12/2018	95-03-29-0952-53, 01-08-09-1854-29		Ground Water	VO			Remediation Standards			Excavation			No	March 1995 - Incident #95-03-29-0952-53 was called-in to the NJDEP Hotline regarding a release from the UST system. August 2001 - NOI was filed for UST designated as #E3 for the facility on 11/8/00. UST was removed on 8/9/01 under TMS #N00-0975 and post excavation sampling was conducted. No evidence of contamination was found in soil in the tank excavation; however, evidence of a discharge was noted at the associated gasoline dispenser island. Incident #01-08-09-1854-29 was called-in to the NJDEP Hotline. December 2001 - Site Investigation Report - Post excavation samples contained no exceedances of the Soil Remediation Standards. A grab ground water sample collected from the open excavation at the dispenser island contained benzene in excess of the NJDEP Ground Water Quality Standards. March 2015 - RIR/RAR - A Remedial Investigation was conducted for soil and ground water. There were no exceedances of the Soil Remediation Standards. A grab ground water sample collected in September 2013 from a boring in the location of the former dispenser island (SB-7) contained no exceedance of benzene, but did contain exceedances of cyclohexane and VOC TICs. A ground water sample collected in September 2014 from a permanent monitoring well (MW-4) installed immediately downgradient of the dispenser island contained no VOC detections. The RI is complete. The RA is complete. No further investigation or remediation is required for this AOC. March 2018 - RAO - A restricted use RAO-A was issued

Case Name: Riverfront State Prison

PI #: 015986

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Case Inventory Document Version 1.4 02/23/17

AOC ID	AOC Type	AOC Description	Confirmed Contamination	AOC Status	Status Date	Incident #	DEP AOC Number	Contaminated Media	Contaminants of Concern	Additional Contaminants of Concern	Additional Contaminants of Concern	Applicable Remediation Standard	Exposure Route	Additional Exposure Route	RA Type	Additional RA Type	Additional RA Type	Was an Order of Magnitude Evaluation	Activity
B-4	Storage tank and appurtenance - Unregulated underground storage tank	550 Gallon Waste Oil UST	Yes	RAO-A (Restricted Use)	3/12/2018	01-08-24-1319-54		Ground Water	VO+ Metals			Remediation Standards			Excavation			No	August 2001 - NOI was submitted for Tank #E4 on 11/8/00 under TMS #N00-0754. Tank was removed and post excavation sampling was conducted. A sheen was noted on ground water in the excavation, and the tank contained holes. Incident #01-08-24-1319-54 was called-in to the NJDEP Hotline. December 2001 - Site Investigation Report - Post excavation samples contained no exceedances of the Soil Remediation Standards. A grab ground water sample collected from the open excavation contained metals in excess of the Ground Water Quality Standards. March 2015 - RIR/RAR - A Remedial Investigation was conducted for soil and ground water. There were no exceedances of the Soil Remediation Stadards. A grab ground water sample collected in September 2013 from a boring at AOC B-4 (SB-11) contained metals in excess of the Ground Water Quality Standards. A ground water sample collected in September 2014 from a permanent monitoring well (MW-3) installed at AOC B-4 contained metals in excess of the Ground Water Quality Standards. The metals are naturally occurring or consistent with historic fill contamination. The RI is complete. The RA is complete. No further investigation or remediation is required for this AOC. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
B-5	Storage tank and appurtenance - Unregulated underground storage tank	2,500 Gallon Diesel Fuel UST	No	RAO-A (Restricted Use)	3/12/2018			None	Not Applicable									No	November 2007 - NOI was filed for Tank #E5 on 1/20/04. Tank was removed under TMS #N04-2908 on 11/3/07 and post excavation sampling was conducted. No evidence of contamination was observed in the excavation, and ground water was not encountered. No exceedances were detected in the post excavation samples. 10 September 2008 - NJDEP issued a No Further Action Letter for this AOC. No further investigation or remediation is necessary. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
C	Storage and staging area - Storage pad and area	Drum Storage Area	No	RAO-A (Restricted Use)	3/12/2018			None	Not Applicable									No	1 November 2010 - One 55-gallon metal drum was observed inside the building during a site inspection. The drum was in good condition and no evidence of staining was noted on the floor surrounding the drum. The drum was properly disposed. No further investigation or remedial action is required. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
D	Drainage system and area - Building floor drain and piping	Floor Drains	No	RAO-A (Restricted Use)	3/12/2018			None	Not Applicable									No	August 2001 - The piping and oil/water separators (AOC K) that the floor drains were connected to were removed, and the floor drains were sealed. 2012 - The building containing the floor drains was demolished. March 2015 - RIR/RAR - All associated piping and oil/water separators have been properly investigated, and no evidence of contamination has been found. No further investigation or remediation is required. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
E	Discharge and disposal area - Historic fill material area/other fill area	Historic Fill	Yes	RAO-A (Restricted Use)	3/12/2018			Mixed Media	Metals + PAHs			Remediation Standards	Ingestion/Dermal	Ground Water	Capping	Institutional Control		No	1 November 2010 - Historic fill was identified as an AOC at the site. The site is in an area of NJDEP mapped historic fill. March 2015 - RIR/RAR - The historic fill at the site was not sampled and is assumed to be contaminated above the Soil Remediation Standards. Soil borings were advanced to delineate the historic fill at the site. The Remedial Investigation is complete for this AOC. Institutional and engineering controls are recommended for historic fill at the site. December 2017 RAR - A remedial action was implemented to install a cap across the historic fill area of the site. A deed notice was implemented and the CEA was revised. March 2018 - RAO - A restricted use RAO-A was issued for the site.
F	Other areas of concern - Electrical transformer and capacitor	Electrical Transformers	No	RAO-A (Restricted Use)	3/12/2018			None	Not Applicable									No	1 November 2010 - Electrical transformers were identified as an AOC during a site inspection. No evidence of contamination other than stained concrete below one of the transformers was noted. The concrete was sampled and properly disposed. No further investigation or remedial action is required. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
G	Other areas of concern - Any area suspected of containing contaminants	Boiler Room	No	RAO-A (Restricted Use)	3/12/2018			None	Not Applicable									No	1 November 2010 - The boiler room was identified as an AOC during a site inspection. No evidence of contamination was observed in the boiler room. No further investigation is required. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.
H	Other areas of concern - Compressor vent discharge	Boiler Room - Air Vents	No	RAO-A (Restricted Use)	3/12/2018			None	Not Applicable									No	1 November 2010 - Air vents in the boiler room were identified as an AOC during a site inspection. No evidence of contamination was found, and no further investigation is required. March 2018 - RAO - A restricted use RAO-A was issued for the site; however, this AOC is unrestricted.

PI #: 015986

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3) If the text turns **red** you have exceeded the character limit for that column

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