Haklar, James

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Wednesday, November 02, 2016 5:06 PM
To: Haklar, James
Subject: Former Alcoa Building 12, Edgewater, NJ - Estimated De Minimus Volume of Soil

Jim, as requested, re the former Alcoa Building 12 site in Edgewater, I calculated the estimated volume of soil remaining in the vicinity of sample PE-063 that potentially could have PCB concentrations above 500 mg/kg. The estimated volume ranges from 3.5 to 7.5 cubic yards.

Keith Gagnon, LSRP
LSRP Consulting LLC
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087
908-419-7918 ♦ kgagnon@lsrpconsulting.com
www.lsrpconsulting.com

Haklar, James

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Tuesday, November 01, 2016 12:34 PM
To: Haklar, James
Subject: RE: A few questions [WARNING: DKIM validation failed]
Attachments: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile; Former Alcoa Building 12, Edgewater - Piping Run Investigation

Please see responses below

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Tuesday, November 01, 2016 10:09 AM
To: Keith Gagnon, LSRP Consulting
Subject: A few questions

Hi Keith,

Just a couple of questions before our call tomorrow. I'm in our NYC office today so please bear with me as I recall things from memory. The two locations that were re-sampled, 60R(?) and 63R(?) (PE-061R and PE-063R), were they sampled at the top of bedrock like the original samples? Yes In thinking about the lower concentrations found as opposed to what PennJersey found, do you think it could be a case of the residual soil on top of the bedrock mixing with the backfill so there was some dilution? I don't think so. The backfill at these locations was a yellow sand, which is distinct from the residual native soils. The re-samples were collected from a darker silty sand just above the weathered bedrock. Based on what we know now, it is reasonable to conclude the Pennjersey samples represent a de minimus volume of soil remaining at the top of the bedrock surface following soil excavation, and are not representative of the overall remaining PCB concentrations in the sampling area. The PCB results of individual samples and the average PCB concentration of the samples in the vicinity of PE-061 and PE-063 demonstrate PCB concentrations above 500 mg/kg are not pervasive in this area. Also, will you be sending me an email or letter formally updating me on the status of the pipes and the soil piles? I attached the emails previously sent to you regarding the pipes and soil pile. Let me know if you need something more formal. And lastly, refresh my memory – what's the depth to groundwater and were PCB's found in the groundwater? Ground water was generally not encountered during the soil investigation and excavation activities. Pennjersey was able to collect ground water samples from three temporary wells. Because the property slopes downward toward the east, the depth to ground water ranged from approximately 12 feet below surface (~17.5 ft.msl) in the western portion to approximately 6.5 to 7.5 feet below surface (~9.5 to 8.5 ft.msl) in the eastern portion, near River Road. PCBs were not detected in the three ground water samples and a duplicate sample.

Thanks,

Jim

Haklar, James

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Tuesday, October 04, 2016 10:37 AM
To: Haklar, James
Subject: Former Alcoa Building 12, Edgewater - Piping Run Investigation

Jim, regarding the possible off-site piping runs at the former Alcoa Building 12 in Edgewater, as we discussed last week on the phone, former UST fill piping was not encountered on the adjacent property to the west. On September 26, 2016, equipment was mobilized to the site with the intent to remove the UST piping. However, UST piping was not encountered in two test pits excavated at locations where possible piping was detected by the previous markout contractor.

Prior to the test pits, a visual inspection was performed in the area where the possible UST piping was shown on the markout map (the area is a parking lot for the off-site building). The asphalt patches for the soil boring locations for the previous piping investigation were observed, along with some of the boring designations that had been spray-painted on the asphalt. There was no evidence the asphalt at or near the boring locations had been disturbed or replaced since the soil boring investigation was performed in June 2014.

The first test pit was located immediately west of the retaining wall separating the two properties, through the two locations where the markout contractor detected possible UST piping. The test pit was oriented north-south, parallel to the property boundaries and perpendicular to the two possible piping runs, and was approximately 3 feet wide, 13.5 feet long and 13 feet deep (to bedrock). The piping was expected to be approximately 4 to 5 feet below surface. No evidence of UST piping was observed.

The second test was located toward the north, adjacent to a former soil boring location and through one of the possible piping runs. The test pit was approximately 4 feet wide, 6 feet long and 8.5 feet deep. Similar to the first test pit, no evidence of former UST piping was observed.

Both test pits encountered PVC piping for stormwater drains and sanitary waste that had been installed for the adjacent building during the redevelopment of the off-site property. It is possible the previous markout contractor detected the PVC piping and believed it to be former UST piping.

Based on the results of the test pit investigation, former UST piping was not encountered on the adjacent property and no further investigation or remediation is warranted for the possible piping runs.

Keith Gagnon, LSRP
LSRP Consulting LLC
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087
908-419-7918 ♦ kgagnon@lsrpconsulting.com
www.lsrpconsulting.com

Haklar, James

From: Haklar, James <Haklar.James@epa.gov>
Sent: Friday, September 30, 2016 10:25 AM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Great – thanks!

And yes, it is a big file!

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Friday, September 30, 2016 10:20 AM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Jim, you may download copies of the manifests using this link (too large to email): Soil Stockpile Disposal Manifests for Former Alcoa Building 12 Edgewater NJ

From: Keith Gagnon, LSRP Consulting
Sent: Monday, September 26, 2016 10:41 AM
To: 'Haklar, James'
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Jim, attached is a summary of the soil stockpile disposal (tonnage and manifest numbers) for the former Alcoa Building 12 in Edgewater, New Jersey. They haven't received their copies of the actual manifests yet – do you want me to email copies to you when received, or is this summary sufficient?

Keith

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Monday, September 19, 2016 1:33 PM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Great – thanks!

Please don't forget to send me a copy of the manifests.

Jim

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Monday, September 19, 2016 1:31 PM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

All gone. Loaded out September 7, 8 and 9, 2016

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Monday, September 19, 2016 1:27 PM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Hi Keith,

Is the stockpile gone, or is in the process of being removed?

Jim

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Tuesday, September 06, 2016 10:02 AM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Jim, the soil stockpile at the former Alcoa Building 12 is being removed this week.

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Wednesday, August 31, 2016 10:15 AM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

O.K. thanks!

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Wednesday, August 31, 2016 10:14 AM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

They had questions about the EPA ID number for the property because the EPA database didn't show it, they wanted to know if North River Mews purchased the property from Alcoa, and they wanted to know what operations Alcoa performed at the property. They also asked questions about the generator and who was going to sign the manifests.

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Wednesday, August 31, 2016 9:00 AM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Hi Keith – Thanks for the message. Just curious what type of questions WM would have, since they're a TSCA facility?

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Friday, July 29, 2016 2:25 PM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Jim, re the stockpile, a disposal contractor has been chosen. The soils will be disposed of at the Waste Management landfill in Emelle, Alabama. They are in the process of scheduling when the pile will be removed.

Keith

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Friday, July 15, 2016 7:15 AM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Thanks for the quick response!

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Thursday, July 14, 2016 11:54 AM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

The stockpile waste class sampling results are attached. I was not on-site when the pile was first generated, so I'm not 100% positive there's a liner under the pile, but based on how well they've kept the pile covered with plastic, I expect they placed a liner under the pile.

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Thursday, July 14, 2016 11:48 AM
To: Keith Gagnon, LSRP Consulting
Subject: Re: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Thanks Keith. Can you please send us the analytical results for the pile. Also, you mentioned that the pile is covered. Does it have a liner that it's sitting on?

Jim

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Thursday, July 14, 2016 11:18:22 AM
To: Haklar, James
Subject: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Jim, as requested, I am providing you with the following information regarding the soil stockpile at the former Alcoa Building 12 in Edgewater, New Jersey:

- The soil stockpile was initially generated during October 2015.
- The soils originated from excavations for utility lines/piping and for the installation of wall footings from various locations at the property, and includes sediment from the two stormwater manholes.
- The majority of the soils were added to the stockpile between October 2015 and February 2016.
- The stockpile is approximately 450 cubic yards and has been covered with plastic.
- The soil will be disposed of at a TSCA-approved landfill.
- Waste class samples were collected and analyzed during February 2016.
- The initial disposal proposal was received during February 2016.
- Additional disposal proposals were requested during July 2016.
- A disposal contractor will be chosen and the removal/disposal of the stockpile will begin late July/early August 2016.

Keith

Keith Gagnon, LSRP
LSRP Consulting LLC
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087

908-419-7918 ♦ kgagnon@lsrpconsulting.com
www.lsrpconsulting.com

Haklar, James

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Wednesday, August 31, 2016 10:14 AM
To: Haklar, James
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

They had questions about the EPA ID number for the property because the EPA database didn't show it, they wanted to know if North River Mews purchased the property from Alcoa, and they wanted to know what operations Alcoa performed at the property. They also asked questions about the generator and who was going to sign the manifests.

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Wednesday, August 31, 2016 9:00 AM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Hi Keith – Thanks for the message. Just curious what type of questions WM would have, since they're a TSCA facility?

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Friday, July 29, 2016 2:25 PM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Jim, re the stockpile, a disposal contractor has been chosen. The soils will be disposed of at the Waste Management landfill in Emelle, Alabama. They are in the process of scheduling when the pile will be removed.

Keith

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Friday, July 15, 2016 7:15 AM
To: Keith Gagnon, LSRP Consulting
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Thanks for the quick response!

From: Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]
Sent: Thursday, July 14, 2016 11:54 AM
To: Haklar, James <Haklar.James@epa.gov>
Subject: RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

The stockpile waste class sampling results are attached. I was not on-site when the pile was first generated, so I'm not 100% positive there's a liner under the pile, but based on how well they've kept the pile covered with plastic, I expect they placed a liner under the pile.

From: Haklar, James [mailto:Haklar.James@epa.gov]
Sent: Thursday, July 14, 2016 11:48 AM
To: Keith Gagnon, LSRP Consulting
Subject: Re: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Thanks Keith. Can you please send us the analytical results for the pile. Also, you mentioned that the pile is covered. Does it have a liner that it's sitting on?

Jim

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Thursday, July 14, 2016 11:18:22 AM
To: Haklar, James
Subject: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Jim, as requested, I am providing you with the following information regarding the soil stockpile at the former Alcoa Building 12 in Edgewater, New Jersey:

- The soil stockpile was initially generated during October 2015.
- The soils originated from excavations for utility lines/piping and for the installation of wall footings from various locations at the property, and includes sediment from the two stormwater manholes.
- The majority of the soils were added to the stockpile between October 2015 and February 2016.
- The stockpile is approximately 450 cubic yards and has been covered with plastic.
- The soil will be disposed of at a TSCA-approved landfill.
- Waste class samples were collected and analyzed during February 2016.
- The initial disposal proposal was received during February 2016.
- Additional disposal proposals were requested during July 2016.
- A disposal contractor will be chosen and the removal/disposal of the stockpile will begin late July/early August 2016.

Keith

Keith Gagnon, LSRP
LSRP Consulting LLC
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087
908-419-7918 ♦ kgagnon@lsrpconsulting.com
www.lsrpconsulting.com

Haklar, James

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Wednesday, August 31, 2016 4:58 PM
To: Haklar, James
Subject: Former Alcoa Building 12, Edgewater - Remediation Progress Report

Jim, I prepared a Remediation Progress Report for the former Alcoa Building 12 in Edgewater, New Jersey. The file is too large to email; please download a copy using this link: 2016 08 Remediation Progress Report Former Alcoa Bldg 12 Edgewater

Keith

Keith Gagnon, LSRP
LSRP Consulting LLC
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087
908-419-7918 • kgagnon@lsrpconsulting.com
www.lsrpconsulting.com

Haklar, James

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Tuesday, February 02, 2016 2:20 PM
To: Haklar, James
Subject: Concrete sampling and disposal, PCBs, Former Alcoa Building 12, Edgewater, NJ
Attachments: Former Alcoa Bldg 12 - concrete floor sampling and disposal from 1999 1018 RAR for Building 12.pdf

Jim, following up our conversation last week regarding crushed concrete backfill at the former Alcoa Building 12 in Edgewater, specifically whether the original PCB concentrations in the concrete source material were greater than 500 ppm, I reviewed the previous reports for the site.

The attached portion of the October 1999 Remedial Action Report for Building 12 discusses how the concrete floors were tested for PCBs and how the portions of the floors with PCB concentrations greater than 0.5 ppm were removed and either disposed of off-site at Model City (concentrations greater than 50 ppm) or crushed and re-used off-site for road bed material (concentrations between 0.5 and 50 ppm).

The report also provides the PCB sampling results for the walls. All wall sampling results were 1 ppm or less.

Based on this report, any remaining concrete floors or walls that were crushed and re-used on site for backfill would not have contained PCB concentrations greater than 500 ppm.

Keith

Keith Gagnon, LSRP
LSRP Consulting LLC
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087
908-419-7918 ♦ kgagnon@lsrpconsulting.com
www.lsrpconsulting.com

Remedial Investigation Report
Remedial Action Report

Former ALCOA Facility – Building 12
(NJDEP #97-6-10-0037-28)
700 River Road
Edgewater, New Jersey 07020

Prepared for:
North River Mews Associates, L.L.C.
725 River Road
Edgewater, New Jersey 07020

Prepared by:

Michele Viventi, Environmental Scientist

Mark London, Vice President/CIO

ENVIRO-SCIENCES, INC.
111 Howard Boulevard, Suite 108
Mt. Arlington, New Jersey 07856
(973) 398-8183 – (973) 398-8037 (F)

REMEDIAL INVESTIGATION REPORT
REMEDIAL ACTION WORKPLAN
River Mews Associates
(Building 12 - Former Alcoa Facility)
700 River Road
Edgewater, New Jersey 07020
(NJDEP #97-6-10-0037-28)

1.0 INTRODUCTION

North River Mews Associates (NRMA) currently owns the subject property, located at 700 River Road in the City of Edgewater, Bergen County, New Jersey (see Figure 1). The property was formerly owned by the Aluminum Company of America (Alcoa), a manufacturer of sheet metal and airplane components from the early 1920s to 1968. In June 1997, NRMA entered into Memorandum of Agreement (MOA) with the New Jersey Department of Environmental Protection (NJDEP), accepting responsibility for performing remediation of the PCB-impacted concrete structural material on the subject site.

On February 3, 1999, NRMA subdivided the subject property, making the portion of the site containing Building 12 a separate parcel. On February 18, 1999, NRMA delivered NJDEP a Remedial Action Report that covered the entire site, except for Building 12. A No Further Action (NFA) was issued by NJDEP on March 9, 1999, for this portion of the subject property.

Enviro-Sciences, Inc. (Enviro-Sciences) was retained by North River Mews Associates, L.L.C. (NRMA) to prepare this Remedial Investigation Report (RIR) and subsequent Remedial Action Workplan (RAW) for Building 12. This report provides information relevant to Building 12 only.

This RIR describes the results of Enviro-Sciences' sampling program that defined areas within Building 12 that potentially contained polychlorinated biphenyl (PCB) contaminated walls and floors. This report also provides information pertaining to the proposed remediation of the walls. This remediation would occur when the structure is rehabilitated as a parking structure.

The PCB sampling plan for the walls was prepared in consultation with both NJDEP and the US Environmental Protection Agency (EPA) (Appendix A). The plan was formulated because PCBs were identified in specific areas of the floor in Building 12 by Woodward-Clyde (WCC) in a November 1998 report.

In response to this concern, the concrete flooring within Building 12 was examined. The floor was divided into "panels" defined by the supporting columns of the building. Panels found to have PCB concentrations in excess of 0.49 parts per million (ppm) were carefully removed. The contaminated concrete was segregated into two groups. Concrete with concentrations in excess of 50 ppm of PCBs was stored onsite for a brief time. Subsequently, this material was disposed of in a secure landfill in Model City, New York. Concrete found to have PCB concentrations between 0.5 ppm and 50 ppm was crushed, then removed from the property and used as road base.

The NJDEP had also expressed concern about the walls in Building 12. It was believed that the walls may have also contain PCBs. There had never been any testing of the walls. NJDEP also expressed concern about the reuse of the structure for parking, to be located below a residential tower.

In June 1998, Enviro-Sciences submitted a proposed wipe-sampling plan for NJDEP review. During the review process, guidance was sought from the US EPA regarding the concrete reuse issues. Based on US

EPA comments, the sampling plan was modified to substitute core samples for wipe samples. Both the NJDEP and US EPA comments were incorporated into the plan executed to prepare this RIR. The NJDEP and US EPA approved the core sampling plan in letters to Enviro-Sciences dated August 5, 1999, and October 7, 1999, respectively.

This RIR discusses the sampling results from both the floors and walls of Building 12. In addition, it proposes a Remedial Action Workplan (RAW) to complete the remediation of Building 12. This document was prepared in accordance with the NJDEP Technical Requirements for Site Remediation (N.J.A.C. 7:26E) and Guidance Document for the Remediation of Contaminated Soils (June 1996).

To facilitate discussion of the information presented in this RAW, a general description of the subject property and prior sampling are presented in Section 2.0. Remedial standards are defined in Section 3.0, followed by Section 4.0 that discusses the implemented sampling plan. Section 5.0 provides the Remedial Action Workplan to be implemented to complete the project. Section 6.0 contains the Health and Safety Plan used during the sample collection. If needed for review purposes, a full discussion of site historic studies can be found in the February 1999 RAR.

4.0 DESCRIPTION OF REMEDIAL INVESTIGATION

Building 12 is currently standing vacant and partially rehabilitated. All the interior walls have been removed. The exterior walls enclose a space containing two stories. A floor divides this space into two stories. The first story includes a partial basement that underlies the eastern portion of the building. The second story runs the entire length of the building.

4.1 The Floor

The floor in this building was constructed of a two-way system of flat slabs. The slabs were supported on mushroom columns that supported the drop-in panels. This construction technique was similar to the construction technique used in the other buildings on the site. Each slab consisted of reinforced concrete, typically twelve inches in thickness. The structural bays, as defined by the columns, measure 19 feet by 16 feet.

The floor was divided into "panels" defined by the supporting columns of the building. The floor panels were sampled and those found to be contaminated with PCBs in excess of the 0.49 ppm criteria have been removed by jack hammering and selective concrete cutting. Panels found to have PCB levels between 0.49 and 5.0 ppm were crushed and recycled as roadway fill. Panels with contamination in excess of 5.0 ppm were taken to a secure landfill located in Model City, New York. The floor sampling results are included as Table 1. The manifests for the entire site were submitted to the NJDEP as Appendix 6 of the February 18, 1999, RAR.

4.2 Exterior Walls

On September 17, 1999, the exterior walls of Building 12 were tested to determinate if they were contaminated with PCBs. The program consisted of collecting a series of ten core samples.

The cores were collected from approximately one foot above the intersection of the wall and floor. They were biased towards areas of visible staining or discoloration. The differentiation of walls either suspected or not suspected of having PCB contamination was based on their locations. Walls adjacent to floor panels that were removed, were determined to be suspect of having contamination. Walls adjacent to existing floor panels were determined to be less contaminated. Five cores were collected from exterior wall panels suspected of having elevated concentrations of PCBs. In addition, five additional cores were taken from exterior walls suspected of having minimal PCB contamination.

After collection of each core, sub-samples were taken: the first 2-inch and the second 2-inch segments were harvested. Each was subsequently crushed prior to being sent to the laboratory. The proposed sampling plan (Appendix 1) was implemented after receiving NJDEP approval. No permits were required to implement the plan.

The sampling results are presented in Table 2 and Figure 3. They indicate that all of the cores collected from suspected areas without contamination had PCB concentrations below the 0.49 ppm criteria, both in the surficial and 2-inch depth samples. As for the areas that were suspected as being contaminated, three of the five surficial samples had PCB concentrations slightly in excess of the 0.49 ppm criteria. Only one of these samples exhibited contamination in the 2-inch depth section. This last sample was the most visibly stained.

Haklar, James

From: Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>
Sent: Wednesday, September 30, 2015 4:24 PM
To: Haklar, James
Cc: Kevin Schick (Kevin.Schick@dep.nj.gov)
Subject: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015
Attachments: 2015 0930 Response to EPA Alcoa Bldg 12.pdf

Jim, on behalf of North River Mews, the response to the USEPA's letter dated 27, 2015 regarding the Former Alcoa Building 12 in Edgewater, New Jersey is attached.

Thank you, Keith

Keith Gagnon, LSRP
LSRP Consulting LLC
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087
908-419-7918 • kgagnon@lsrpconsulting.com
www.lsrpconsulting.com

LSRP CONSULTING LLC

11 Lake Michigan Drive, Little Egg Harbor Township, NJ 08087 • 908-419-7918 • www.lsrpconsulting.com

September 30, 2015

US Environmental Protection Agency, Region 2
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679

Attn: Dr. James Haklar

Re: *Response to USEPA Letter dated July 27, 2015*
Former Alcoa Building 12 Property, 660 River Road, Block 74, Lot 1.02B
Edgewater, Bergen County, New Jersey 07020
NJDEP PI No. 023713, Case Nos. 13-10-10-1558-57 and 14-04-04-1604-09

Dear Dr. Haklar,

On behalf of North River Mews Associates, LLC (North River Mews), LSRP Consulting LLC[1] has prepared the following response to the US Environmental Protection Agency's (USEPA's) letter dated July 27, 2015 (Attachment 1) regarding the former Alcoa Building 12 property.

The USEPA's letter provided comments to Pennjersey Environmental Consulting's March 2015 *Remedial Investigation Report/Remedial Action Report/Remedial Action Workplan*. The responses below are in the same order as the USEPA's letter.

The Remedial Approach

The USEPA has established 500 parts per million (ppm) as the maximum PCB concentration that can remain under the approved site-wide cap at the subject property. The USEPA's letter notes that Figure 16 of Pennjersey's March 2015 report shows PCB concentrations above 500 ppm remaining at the site.

The figure shows four soil samples with PCB concentrations above 500 ppm. Samples PS-001 and PS-002, at 1,122 and 836 ppm, respectively, were in the western portion of the property and associated with two former underground storage tanks (USTs). However, inclusion of these two samples on Figure 16 appears to be an error, as the March 2015 report (Section 3.2.5.1) states samples PS-001 and PS-002 were excavated during March 2014.

Samples PE-061 and PE-063, at 687 and 735 ppm, respectively, were in the southwestern portion of the property and associated with the soil excavation for the former USTs. The inclusion of these two samples on Figure 16 may also be an error, as the March 2015 report states the area in the vicinity of the samples were excavated during May 2014 (Section 3.2.6).

[1] Keith Gagnon of LSRP Consulting LLC was recently retained as the Licensed Site Remediation Professional (LSRP) for the former Alcoa Building 12 by North River Mews Associates, LLC

To confirm PCB concentrations above 500 ppm are not present at the PS-001, PS-002, PE-061 and PE-063 locations, one soil sample will be collected adjacent to each of the four former sample locations and analyzed for PCBs (see map, Attachment 2). If PCBs are detected above 500 ppm, the impacted soils will be excavated.

The Extent of Characterization
The USEPA letter included two comments regarding the extent of characterization:

On-Site
The USEPA requested additional PCB characterization in the northwestern portion of the subject property, in the area encircled by samples SS/SB-011, SB-015A/B, SS-015, SS-014, PE-078, PE-071, PE-070 and SB-021A/B/C. North River Mews proposes to complete four soil borings (SB-029 through SB-032) at the locations shown on the map in Attachment 2.

To address potential off-site issues, three additional on-site characterization soil samples are proposed: SB-033 and SB-034 in the northwest portion of the property and boring SB-035 in the southeast corner (see map in Attachment 2).

Each of seven borings will extend to a depth of 2 feet and the soils will be visually screened for evidence of staining and PCB contamination. At least one soil sample will be collected from each boring from the interval suspected of being contaminated; if no evidence of contamination is observed, the sample will be collected from the initial 6-inch interval of soil below the previously installed gravel layer. This plan is consistent with the sampling performed during the site-wide soil characterization activities, where the initial characterization samples were collected within the upper 1 foot of soil.

North River Mews will provide the USEPA with a map showing the locations and concentrations of the remaining PCB concentrations in soil at the property.

Off-Site
The USEPA commented that while the entire subject property will be covered by the cap, the characterization sampling data does not show the extent of the cap is sufficient to isolate all PCBs (i.e., adjacent off-site soils) above the USEPA's applicable PCB cleanup levels.

To the south of the subject property, a review of Pennjersey's March 2015 report, including Figure 16, shows previously analyzed nearby off-site samples sufficiently characterize the soils. Along Vreeland Terrace, 12 off-site soil samples were collected from 7 borings; no PCBs were detected with the exception of an estimated concentration of 0.04 ppm in one sample.

To the west, 12 off-site soil samples collected from 6 borings adjacent to the UST piping run and near the UST remediation area; no PCBs were detected. As discussed above, two proposed soil

samples (SB-033 and SB-034) will address potential off-site issues in the northwest portion of the property.

To the east, River Road is adjacent to the subject property. As discussed in a February 1999 *Remedial Action Report* prepared by Enviro-Sciences, Inc. (ESI), in accordance with a Remedial Action Workplan approved by the New Jersey Department of Environmental Protection (NJDEP), crushed concrete containing less than 50 ppm of PCBs was used as grading material beneath River Road by Bergen County (pertinent pages from the ESI report are included as Attachment 3). As discussed above, the proposed soil sample at boring SB-035 will address potential off-site issues in the southeastern portion of the property.

To the north, a cemetery is adjacent to the subject property. The Borough of Edgewater has informed North River Mews that it will perform soil sampling in the cemetery, and any PCB remediation in the cemetery will be managed and addressed separately from the remediation of the former Alcoa Building 12 property. If the Borough of Edgewater does not complete the cemetery investigation, North River Mews will propose a sampling plan to the USEPA.

The Piping Runs

North River Mews will remove and properly dispose of the remaining piping runs. As discussed in Pennjersey's March 2015 report, laboratory analysis of 12 soil samples collected from 6 borings adjacent to the piping runs did not detect any PCBs. Therefore, additional soil sampling following the removal of the piping runs is not necessary, provided visual staining is not observed and/or any incidental liquids from the piping impacts the soil during removal.

Additional Characterization Activities

The USEPA letter discussed additional characterization activities for three areas at or adjacent to the subject property:

Storm Water System

As discussed in Pennjersey's March 2015 report, storm water accumulated in an excavation for the two former USTs. For a few hours, the storm water was pumped into the storm water sewer beneath Vreeland Terrace, the adjacent street to the south of the subject property. It is unknown whether the storm water contained PCBs.

A map showing the location of the storm water system beneath Vreeland Terrace is included as Attachment 4. The storm water system adjacent to the former Alcoa Building 12 consists of one catch basin, two manholes and approximately 225 feet of 18-inch concrete pipe.

To address the potential that the storm water contained PCBs, the sediment in the catch basin and the two manholes will be removed and disposed of as PCB waste. Based on the short-term storm water discharge (a few hours during one day), it is unlikely the concrete pipe was impacted by PCBs. However, following sediment removal, two concrete chip samples will be

collected from each of the two manholes for PCB analysis, for a total of four samples. The chip samples will be collected from the floor and from a sidewall near the floor of each manhole.

Former Building Wall Concrete

The locations of the remaining former concrete building walls are shown on the map included as Attachment 5. As discussed in ESI's August 2002 *Remedial Action Report* (included in Appendix E of Pennjersey's March 2015 report), the remaining concrete building walls (approximately 4,570 square feet) have already been sampled, washed and sealed with two layers of an epoxy coating.

Prior to sealing, 21 samples from the concrete walls were collected and analyzed for PCBs via concrete cores from 10 locations biased to areas of visible staining or discoloration. The PCB concentrations ranged from 0.037 to 1.0 ppm, with an average concentration of 0.56 ppm.

The results were provided to the USEPA, which responded with a letter dated October 7, 1999 stating that based on the age of the PCBs and since the PCB concentrations were less than 50 ppm, "any renovation, disposal or use of the walls is not subject to the federal regulations for PCBs". The USEPA's October 7, 1999 letter and the pertinent pages of ESI's report describing the concrete wall sampling and epoxy coating activities are included as Attachment 6.

In accordance with a Remedial Action Workplan approved by the NJDEP on November 11, 2000, the remaining concrete walls were washed and sealed with two layers of an epoxy coating. The NJDEP approved the epoxy coating activities in a letter dated November 20, 2002, and issued a No Further Action (NFA) letter on February 12, 2003.

Based on the previous PCB sampling results for the concrete walls, the USEPA's October 1999 letter, the subsequent sealing of the walls with two layers of an epoxy coating, and the NJDEP approval and NFA letters, the March 2015 proposal to sample and apply two layers epoxy coating on the concrete walls is respectfully withdrawn.

Cemetery Soil

The Borough of Edgewater has informed North River Mews that it will perform soil sampling in the cemetery, and any PCB remediation in the cemetery will be managed and addressed separately from the former Alcoa Building 12 property. Therefore, the March 2015 proposal to sample the cemetery soil is respectfully withdrawn. As discussed above, if the Borough of Edgewater does not complete the cemetery investigation, North River Mews will propose a sampling plan to the USEPA.

Decontamination

No comment necessary.

Following the completion of the activities discussed in this letter, North River Mews will provide the USEPA and NJDEP with a report that will include details of the completed activities, tabulated sample results, figures showing the sample locations, a figure showing the locations and concentrations of the remaining PCB concentrations in soil, and the disposal manifests.

We anticipate this response addresses the USEPA's comments. If you have any questions, please contact me at 908-419-7918 or kgagnon@lsrpconsulting.com.

Sincerely,

Keith Gagnon
LSRP No. 582874

c: Mr. Kevin Schick, NJDEP

ATTACHMENT 1

USEPA LETTER DATED JULY 27, 2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
2890 WOODBRIDGE AVENUE
EDISON, NEW JERSEY 08837-3679

JUL 27 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
Article Number: 7001 0320 0004 7788 8315

Mr. Roger A. Ferguson, Jr., LSRP
President
Pennjersey Environmental Consulting
744 Milford Warren Glen Road
Milford, New Jersey 08848-1647

Re: Former Alcoa Building 12
Borough of Edgewater, New Jersey

Dear Mr. Ferguson:

The United States Environmental Protection Agency (EPA) has reviewed the March 5, 2015 document entitled "Remedial Investigation/Remedial Action Report/Remedial Action Workplan" (Workplan), prepared and submitted by Pennjersey Environmental Consulting on behalf of North River Mews Associates, LLC (North River Mews). The Workplan presents an application for a risk-based cleanup, under 40 CFR 761.61(c), of polychlorinated biphenyls (PCBs) present at the former Alcoa Building 12 property (former Alcoa property) located at 660 River Road in Edgewater, New Jersey. EPA's comments on the Workplan are provided below.

The Remedial Approach: With the exception of limited excavation for the installation of utilities, the Workplan proposes in-place disposal of PCBs under the building slab with the building's slab functioning as the cap. The Workplan proposes that levels of PCBs as high as 1,122.2 parts per million (ppm) (as shown on Workplan Figure 16) will remain on the property. The highest concentration of PCBs that EPA Region 2 targets for on-site disposal in a risk-based cleanup is 500 ppm. This is based on several factors including the potential for future impacts to groundwater and surface water as well as an intent to limit the volume of high concentration PCBs remaining on a contaminated property (where the PCBs could be considered a principal threat to human health or the environment). Given that the former Alcoa property is being redeveloped for commercial (high occupancy) use and is situated in a densely populated area along a major surface water body, we do not believe that concentrations greater than 500 ppm should remain on the Site.

The Extent of Characterization: The extent of characterization is insufficient to support the proposed remedial approach. There is an area of the property, encircled by sample locations SS/SB-011, SB-015A/B, SS-015, SS-014, PE-078, PE-071, PE-070, and SB-021A/B/C that has not been characterized. Furthermore, while we understand that the proposed cap will extend over the entire property, the existing characterization data does not show that the extent of the cap is sufficient to isolate all PCBs above the Agency's high occupancy unrestricted cleanup level of 1 ppm or the low occupancy (uncapped) cleanup level of 25 ppm.

The Piping Runs: The Workplan describes that the piping runs were crimped closed and, apparently, abandoned in place. Since there was liquid in the piping and soil near the piping is contaminated with PCBs, we do not understand the reason that the piping was not removed. The piping must be addressed in accordance with the federal PCB regulations.

Additional Characterization Activities: The Workplan presents additional characterization activities for the storm water system, the former building wall concrete, and the cemetery soil. With regard to the investigation of the storm water system and former building wall concrete, the information provided is insufficient for EPA to use to determine whether the work is appropriate. The details of these activities must be submitted to EPA for review and approval.

The proposed cemetery investigation consists of collecting six soil samples along the boundary with the former Alcoa property and we do not believe this is sufficient for adequate characterization. We recommend that samples be collected along the property boundary on a 20-foot by 20-foot grid with samples collected at the grid nodes. Please be advised that the Borough of Edgewater has informed EPA that it is anxious to reopen the cemetery which is closed until the PCBs have been characterized. We believe that the cemetery sampling can be separated from the other Workplan issues and we therefore ask North River Mews to perform this work, in accordance with our aforementioned recommendation, as soon as possible.

Decontamination: Please be advised that all sampling and other remediation equipment that contacts soil potentially contaminated by regulated PCBs must be decontaminated in accordance with 40 CFR 761.79.

Based on the aforementioned comments, EPA cannot, at this time, approve North River Mews' plan for risk-based disposal of PCBs at the former Alcoa property. The Agency will reevaluate its determination once the Agency's comments are addressed.

If you have any questions please contact Dr. James Haklar at (732) 906-6817 or at haklar.james@epa.gov.

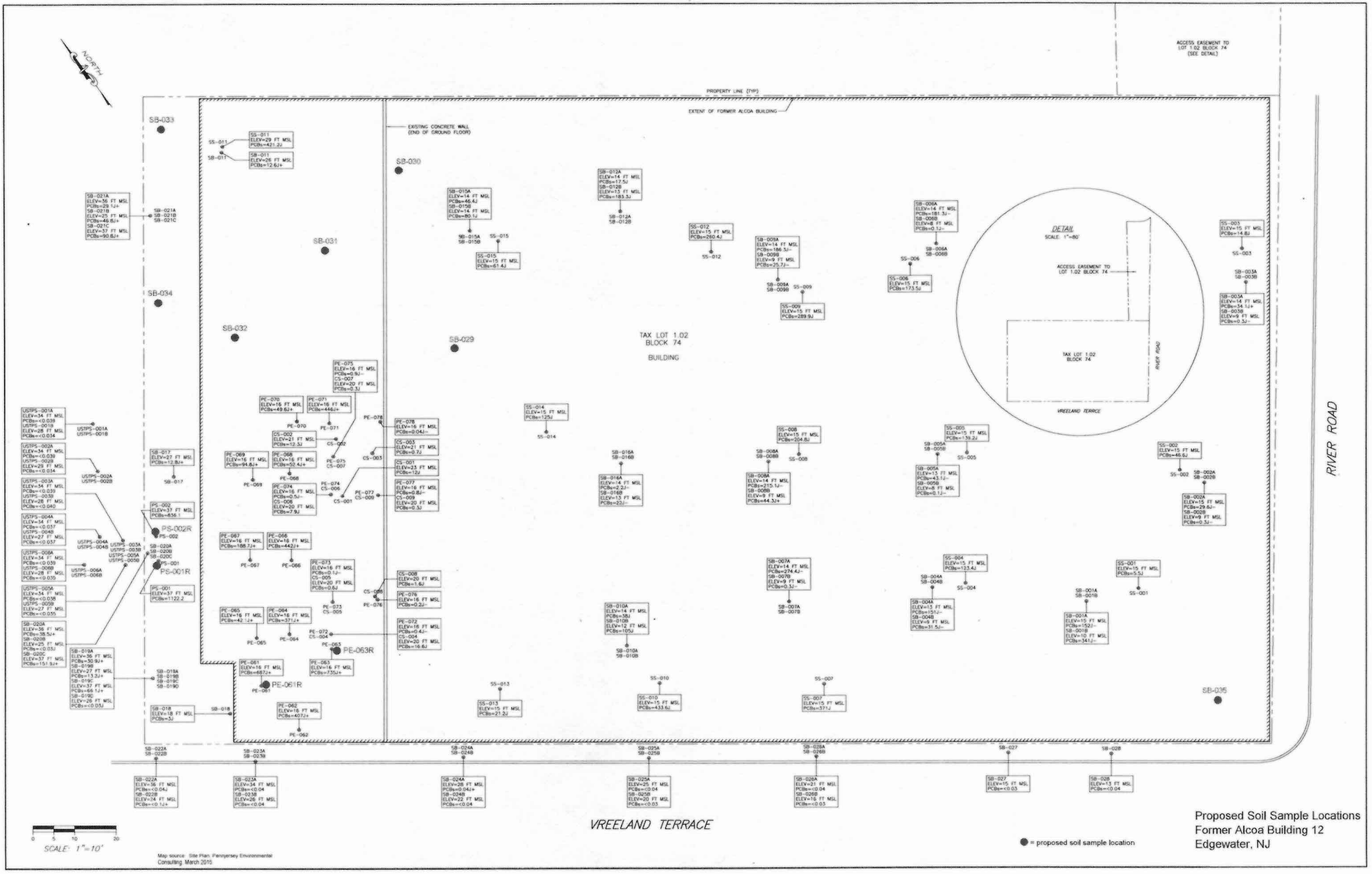
Sincerely yours,

John Gorman, Chief
Pesticides and Toxic Substances Branch

cc: Kevin Schick, New Jersey Department of Environmental Protection

ATTACHMENT 2

PROPOSED SOIL SAMPLE LOCATIONS


NORTH
PROPERTY LINE (TYP)
EXTENT OF FORMER ALCOA BUILDING
EXISTING CONCRETE WALL (END OF GROUND FLOOR)
ACCESS EASEMENT TO LOT 1.02 BLOCK 74 (SEE DETAIL)
DETAIL
SCALE: 1"=80'
ACCESS EASEMENT TO LOT 1.02 BLOCK 74
TAX LOT 1.02 BLOCK 74
RIVER ROAD
VREELAND TERRACE
TAX LOT 1.02 BLOCK 74
BUILDING
RIVER ROAD
VREELAND TERRACE
SB-033
SB-030
SB-031
SB-034
SB-032
SB-029
SB-035
SS-011 ELEV=29 FT MSL PCBs=421.2J
SB-011 ELEV=26 FT MSL PCBs=12.6J+
SB-021A ELEV=36 FT MSL PCBs=29.1J+ SB-021B ELEV=25 FT MSL PCBs=46.6J+ SB-021C ELEV=37 FT MSL PCBs=90.8J+
SB-015A ELEV=14 FT MSL SB-015B ELEV=14 FT MSL PCBs=80.1J
SS-015 ELEV=15 FT MSL PCBs=61.4J
SB-012A ELEV=14 FT MSL PCBs=17.5J SB-012B ELEV=13 FT MSL PCBs=183.5J
SS-012 ELEV=15 FT MSL PCBs=250.4J
SB-009A ELEV=14 FT MSL PCBs=186.5J+ SB-009B ELEV=9 FT MSL PCBs=25.7J+
SS-009 ELEV=15 FT MSL PCBs=289.9J
SB-006A ELEV=14 FT MSL PCBs=181.3J+ SB-006B ELEV=8 FT MSL PCBs=0.1J+
SS-006 ELEV=15 FT MSL PCBs=173.5J
SS-003 ELEV=15 FT MSL PCBs=14.8J
SB-003A SB-003B
SB-003A ELEV=14 FT MSL PCBs=34.1J+ SB-003B ELEV=9 FT MSL PCBs=0.3J+
SB-014 ELEV=15 FT MSL PCBs=125J
SS-014
SB-016A SB-016B
SB-016A ELEV=14 FT MSL PCBs=2.2J+ SB-016B ELEV=13 FT MSL PCBs=23J+
SS-008 ELEV=15 FT MSL PCBs=204.8J
SB-008A SB-008B
SB-008A ELEV=14 FT MSL PCBs=215.1J+ SB-008B ELEV=9 FT MSL PCBs=44.3J+
SS-005 ELEV=15 FT MSL PCBs=139.2J
SB-005A SB-005B
SB-005A ELEV=13 FT MSL PCBs=43.1J+ SB-005B ELEV=8 FT MSL PCBs=0.1J+
SS-002 ELEV=15 FT MSL PCBs=46.6J
SB-002A SB-002B
SB-002A ELEV=15 FT MSL PCBs=29.6J+ SB-002B ELEV=9 FT MSL PCBs=0.3J+
SB-017 ELEV=27 FT MSL PCBs=12.8J+
PS-002 ELEV=37 FT MSL PCBs=856 !
PS-002R
PS-001 ELEV=37 FT MSL PCBs=1122.2
PS-001R
SB-020A SB-020B SB-020C
USTPS-001A ELEV=34 FT MSL PCBs=<0.039 USTPS-001B ELEV=28 FT MSL PCBs=<0.034
USTPS-002A ELEV=34 FT MSL PCBs=<0.039 USTPS-002B ELEV=29 FT MSL PCBs=<0.034
USTPS-003A ELEV=34 FT MSL PCBs=<0.039 USTPS-003B ELEV=28 FT MSL PCBs=<0.040
USTPS-004A ELEV=34 FT MSL PCBs=<0.057 USTPS-004B ELEV=27 FT MSL PCBs=<0.057
USTPS-005A ELEV=34 FT MSL PCBs=<0.039 USTPS-005B ELEV=28 FT MSL PCBs=<0.035
USTPS-006A ELEV=34 FT MSL PCBs=<0.036 USTPS-006B ELEV=27 FT MSL PCBs=<0.055
SB-020A ELEV=36 FT MSL PCBs=38.5J+ SB-020B ELEV=25 FT MSL PCBs=<0.03J SB-020C ELEV=37 FT MSL PCBs=151.9J+
SB-019A ELEV=36 FT MSL PCBs=30.9J+ SB-019B ELEV=27 FT MSL PCBs=13.2J+ SB-019C ELEV=37 FT MSL PCBs=66.1J+ SB-019D ELEV=26 FT MSL PCBs=<0.03J
SB-018 ELEV=18 FT MSL PCBs=3J
PE-061 ELEV=16 FT MSL PCBs=687J+
PE-061R
PE-062 ELEV=16 FT MSL PCBs=4072+
PE-063 ELEV=16 FT MSL PCBs=735J+
PE-063R
PE-064 ELEV=16 FT MSL PCBs=371J+
PE-065 ELEV=16 FT MSL PCBs=42.1J+
PE-066 ELEV=16 FT MSL PCBs=442J+
PE-067 ELEV=16 FT MSL PCBs=188.7J+
PE-068 ELEV=16 FT MSL PCBs=52.4J+
PE-069 ELEV=16 FT MSL PCBs=94.6J+
PE-070 ELEV=16 FT MSL PCBs=49.6J+
PE-071 ELEV=16 FT MSL PCBs=446J+
PE-072 ELEV=16 FT MSL PCBs=0.4J- CS-004 ELEV=20 FT MSL PCBs=16.6J
PE-073 ELEV=16 FT MSL PCBs=0.1J- CS-005 ELEV=20 FT MSL PCBs=0.5J
PE-074 ELEV=16 FT MSL PCBs=0.5J- CS-006 ELEV=20 FT MSL PCBs=7.9J
PE-075 ELEV=16 FT MSL PCBs=0.5J- CS-007 ELEV=20 FT MSL PCBs=0.3J
PE-076 ELEV=16 FT MSL PCBs=0.04J- CS-003 ELEV=21 FT MSL PCBs=0.7J
PE-077 ELEV=16 FT MSL PCBs=0.8J- CS-009 ELEV=20 FT MSL PCBs=0.5J
PE-078
CS-001 ELEV=23 FT MSL PCBs=12J
CS-002 ELEV=21 FT MSL PCBs=12.5J
CS-008 ELEV=20 FT MSL PCBs=1.6J
SB-007A ELEV=14 FT MSL PCBs=274.4J- SB-007B ELEV=9 FT MSL PCBs=0.5J+
SB-007A SB-007B
SS-004 ELEV=15 FT MSL PCBs=133.4J
SB-004A SB-004B
SB-004A ELEV=13 FT MSL PCBs=151J- SB-004B ELEV=9 FT MSL PCBs=31.5J+
SS-001 ELEV=15 FT MSL PCBs=5.5J
SB-001A SB-001B
SB-001A ELEV=15 FT MSL PCBs=152J- SB-001B ELEV=10 FT MSL PCBs=341J-
SB-010A ELEV=14 FT MSL PCBs=35J SB-010B ELEV=12 FT MSL PCBs=105J
SB-010A SB-010B
SS-010 ELEV=15 FT MSL PCBs=433.6J
SS-013 ELEV=15 FT MSL PCBs=21.2J
SS-007 ELEV=15 FT MSL PCBs=571J
SB-022A ELEV=36 FT MSL PCBs=<0.04J SB-022B ELEV=24 FT MSL PCBs=<0.1J+
SB-023A ELEV=34 FT MSL PCBs=<0.04 SB-023B ELEV=26 FT MSL PCBs=<0.04
SB-024A ELEV=26 FT MSL PCBs=0.04J+ SB-024B ELEV=22 FT MSL PCBs=<0.04
SB-025A ELEV=25 FT MSL PCBs=<0.04 SB-025B ELEV=20 FT MSL PCBs=<0.03
SB-026A ELEV=21 FT MSL PCBs=<0.04 SB-026B ELEV=16 FT MSL PCBs=<0.03
SB-027 ELEV=15 FT MSL PCBs=<0.03
SB-028 ELEV=13 FT MSL PCBs=<0.04
0 5 10 20
SCALE: 1"=10'
Map source: Site Plan, Pennjersey Environmental Consulting, March 2015
● = proposed soil sample location
Proposed Soil Sample Locations
Former Alcoa Building 12
Edgewater, NJ

ATTACHMENT 3

PERTINENT PAGES
ESI REMEDIAL ACTION REPORT, FEBRUARY 1999

III. REMEDIAL INVESTIGATION – SCOPE OF WORK

There were two Remedial Action Workplans[2] approved for the subject property. The first, dated August 1997, proposed specific actions for Buildings 5, 7, and 9 (Appendix 2). A second RAW, dated September 1997, proposed specific cleanup activities associated with the Russell Avenue Wing, River Road Wing, and Building 11 and 12 (Appendix 3).

It is anticipated that a third and final RAW will be prepared and approved for Building 12, as Building 12 has been bifurcated from the current review process. The results will be reported in a separate RAR.

A. Objectives

Both RAW-1 and RAW-2 included the following objectives:

- Remove all construction materials contaminated with PCBs in excess of the 50 parts per million (ppm) Toxic Substances Control Act (TSCA) cleanup criteria. Materials in this category had to be removed from the site and sent to an approved disposal facility. The removal, temporary on-site storage, and disposal operations had to be cost effective, environmentally sensitive, and executed accordance with NJDEP regulations.

- Additional areas containing construction materials with PCB concentrations between 0.49 and 50 ppm had to be removed from the subject property. Removal would allow the property to meet the NJDEP PCB residential soil cleanup criteria. As these materials contained PCBs that were less than the TSCA criteria, they were removed from the buildings, crushed, processed in an on-site recycling center, and reused for the reconstruction of River Road.

- Dust monitoring and control were significant issues during both the operation of the recycling center and during demolition activities. Concerned parties included the applicant, surrounding property owners, and the adjacent public school.

---

[2] For clarity and when necessary, the RAW for Buildings 5, 7, and 9 will be referred to as RAW-1, and the RAW for the Russell Avenue and River Road Wings, and Building 11 will be referred to as RAW-2. In general, both documents will be collectively referred to as the RAW.

IV. TECHNICAL OVERVIEW

A. Remedial Action Objectives

As stated in Section 4 of this report, the objectives of the remedial action were to:

- Remove PCB contamination in excess of 50 parts per million (ppm) from specific areas of concern (AOC) of the property. This material was disposed off-site at an NJDEP approved site.
- Additionally, remove areas containing PCB concentrations between 0.49 and 50 ppm. This material was then crushed, recycled, and then used as road bedding material off-site.

B. Analytical Findings Summary

1. Buildings 5, 7, and 9

The construction materials historically determined to be contaminated with PCBs, in excess of the 50 ppm standard were removed, temporarily stockpiled on-site, and hauled off site in a controlled manner. The material was shipped under a series of manifests to Model City, New York.

All construction material, including those determined to have PCB concentrations between 0.49 and 50 ppm were removed from the buildings, temporarily stockpiled on-site, and subsequently recycled for off-site usage as roadway construction material. A summary of the analytical data can be found in Appendix 7.

2. Russell Avenue and River Road Wings, and Building 11

As described above and in Table 1, a series of samples were required to be collected by RAW-2. These samples were collected in the prescribed manner and sent to ChemTech (Englewood, New Jersey) for PCB analysis.

The results of the analytical testing are summarized in Table 2. The estimated volumes of contaminated concrete are summarized in Table 3. In addition, the QA/QC packages associated with the results are provided in Appendix 4 and the Electronic Data Deliverables (EDX) area provided in Appendix 5.

V. FINDINGS AND REMEDIAL ACTION REPORT

There were two general areas of concern regarding this project:

- Construction materials contaminated with PCBs in excess of 50 ppm located in Buildings 5, 7, 9, and 11, as well as the Russell Avenue and River Road Wings. This material was selectively removed, staged, and transported to a secure landfill in Model City, New York.
- Concrete contaminated with PCBs concentrations between 0.49 and 50 ppm. The material was also selectively removed, staged, crushed, and subsequently used by Bergen County as grading material for the reconstruction of River Road adjacent to the subject property.

As discussed in Section 4, there is currently no existing or proposed concrete remediation or cleanup standards promulgated in the State of New Jersey. However, for the purposes of this project, PCB-contaminated debris was evaluated with respect to the Unrestricted Use Soil Cleanup Criteria under N.J.A.C. 7:26D.

All areas of concern within the subject property have been remediated as of the date of this report (except for Building 12). The buildings found to have PCB contaminated concrete above 0.49 ppm have had that material removed. Subsequently, it has either been transported to an approved hazardous waste storage facility or recycled and used as sub-base off-site road construction material.

In addition, all of the buildings on the subject property have been demolished and the site graded (except for Building 12). There are no site restoration activities anticipated. The site will be redeveloped with high-density residential dwelling units. The applicant knows of no known on-site areas containing PCB contamination in excess of the 0.49-ppm residential soil cleanup criteria.

A. Disposal Sites Employed

Chemical Waste Management transported all concrete contaminated with PCBs in excess of 50 ppm to their Model City, New York disposal facility. This disposal facility was approved by NJDEP.

B. Manifests Discussion

Copies of the manifest used during the transport of the PCB contaminated concrete to the Model City facility can be found in Appendix 6.

VI. OPERATION AND MAINTENANCE PLAN

All existing building structures, except Building 12, were processed through the recycling center. The processed concrete as noted above was utilized by the Bergen County Department of Planning and Economic Development as road base material in the River Road expansion. None of the material was used by NRMA for on-site construction.

The site is currently being redeveloped into a residential complex by NRMA. There is no on going operational or maintenance plans associated with the removed contaminated material.

IX. CONCLUSIONS

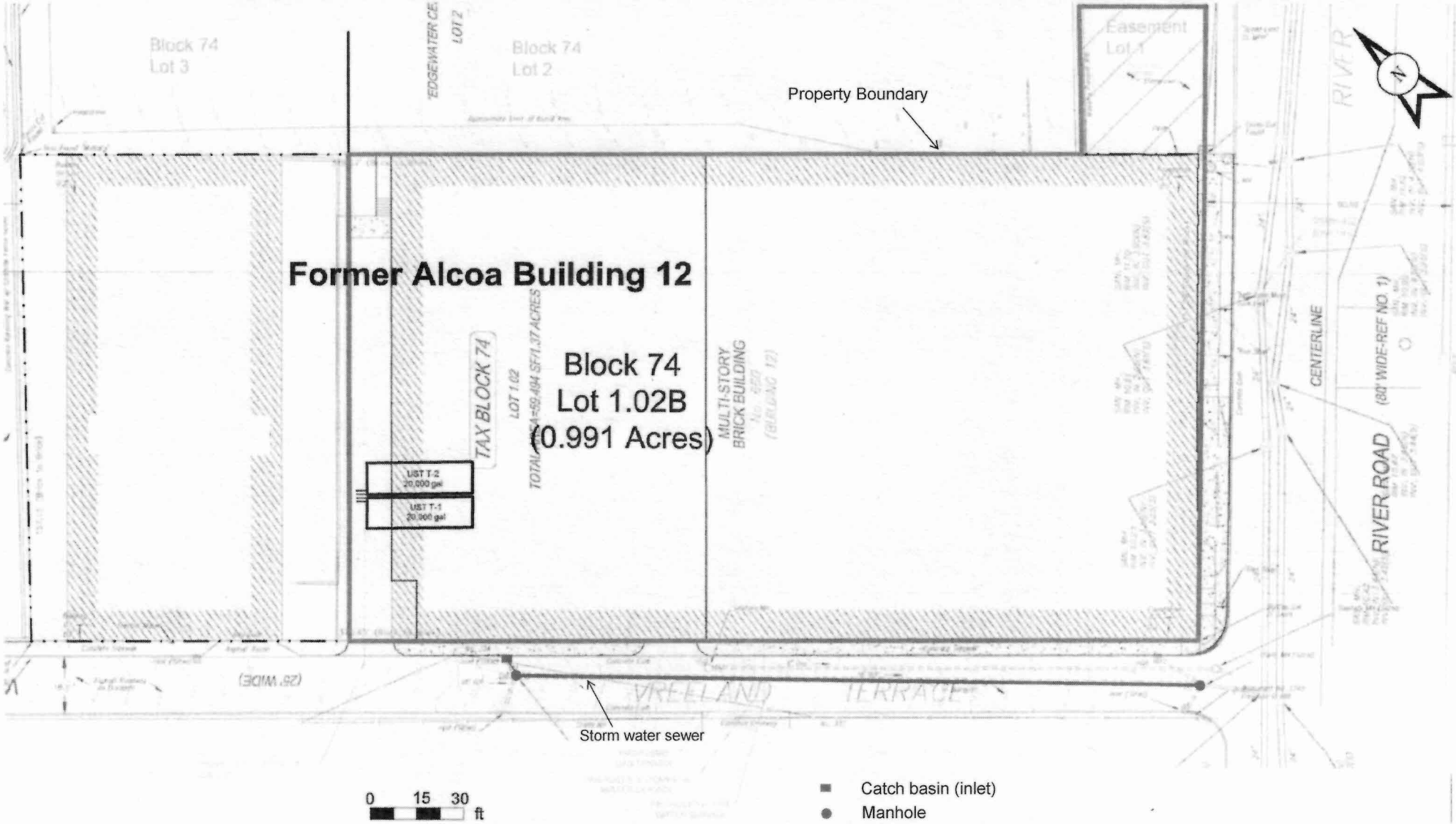
Based on the remedial action assessment, the removal of all PCB contaminated concrete is the appropriate solution for the former Alcoa site. Removing all the contaminated material to NJDEP soil cleanup criteria will protect future tenants, neighboring residential uses, and businesses from potentially hazardous materials on–site.

It is important to note that all the crushed concrete from the subject was used by the County for the reconstruction of River Road. No crushed concrete originating from the demolition material was reused on the subject property.

The measures taken to minimize the exposure of workers and nearby residents to any construction dust during the demolition and removal process was successful.

ATTACHMENT 4

STORM WATER SYSTEM BENEATH VREELAND TERRACE

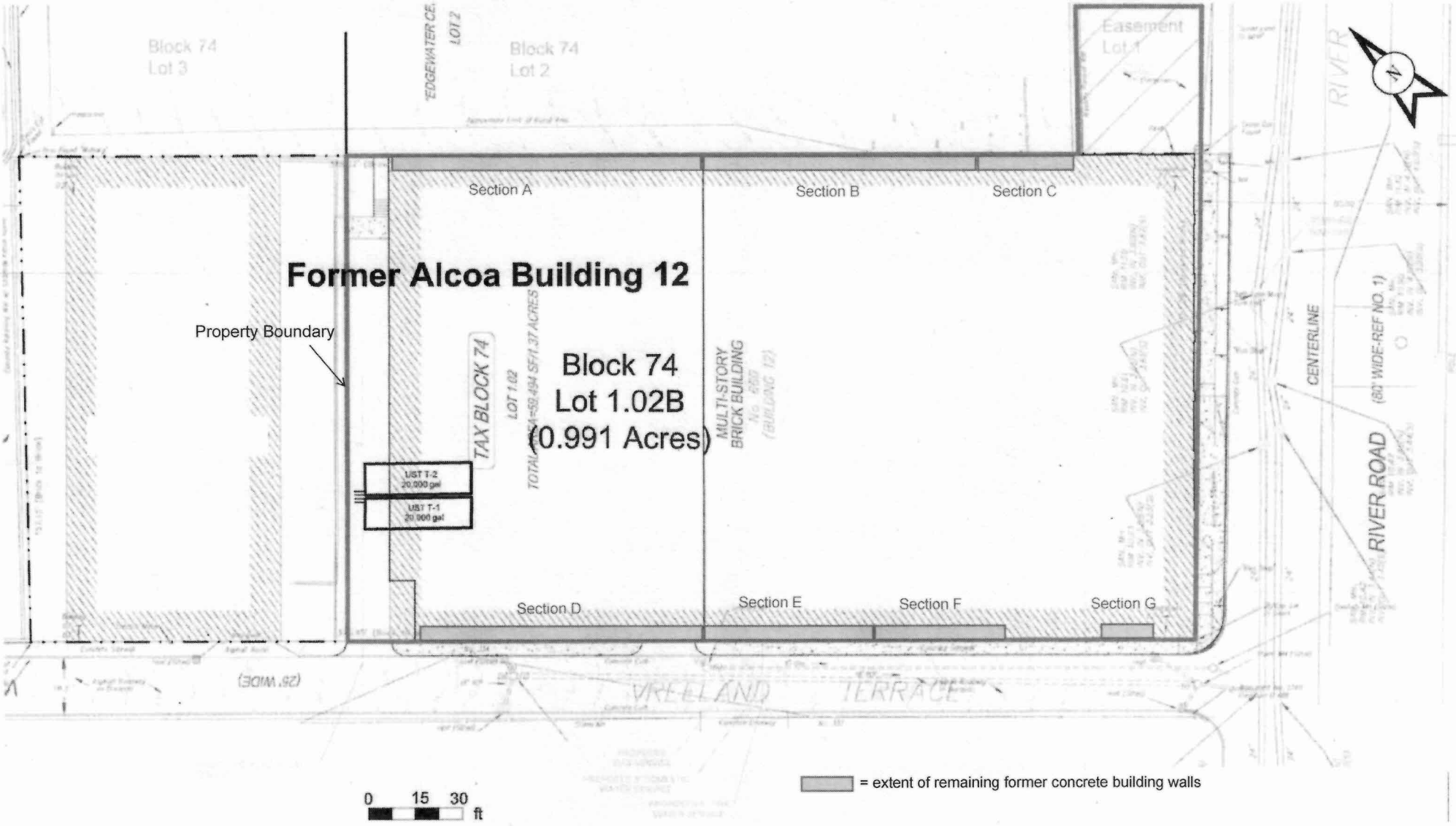


Map source: Site Plan, Pennjersey Environmental Consulting, March 2015

Storm Water Sewer - Vreeland Terrace
Former Alcoa Building 12
Edgewater, NJ

ATTACHMENT 5

LOCATION OF REMAINING FORMER CONCRETE BUILDING WALLS



Remaining Former Concrete Building Walls
Former Alcoa Building 12
Edgewater, NJ

Map source: Site Plan, Pennjersey Environmental Consulting, March 2015

ATTACHMENT 6

USEPA LETTER DATED OCTOBER 7, 1999
AND
PERTINENT PAGES
ESI REMEDIAL ACTION REPORT, AUGUST 2002

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
2890 WOODBRIDGE AVENUE
EDISON, NEW JERSEY 08837-3679

October 7, 1999

Irving D. Cohen, CEP, CES, CEI, Chief Executive Officer
Enviro-Sciences Inc.
111 Howard Boulevard, Suite 108
Mount Arlington, New Jersey 07856

Dear Mr. Cohen:

This is a response to the reported levels of polychlorinated biphenyl (PCB) contamination found in the interior walls of Building 12 at the former ALCOA facility at 700 River Road, Edgewater, New Jersey. Core samples of the concrete walls were obtained based on the sampling plan this office reviewed on July 30, 1999.

The sampling results show PCB contamination in core samples taken at 0"-2" and 2"-4" intervals into the wall to be less than one part per million(ppm). Since the history of this site indicates that contamination occurred prior to the regulation of PCBs by EPA and the levels are less than 50 ppm, the PCBs are not regulated under the federal PCB regulations. Additionally, less than one ppm is the standard or goal for cleanup of bulk PCB contamination in situations where cleanup is required..

It is anticipated that the existing wall areas will be covered as part of the renovations of the building.

Therefore any renovation, disposal or use of the walls is not subject to the federal regulations for PCBs.

This determination is based on the information provided.

If you have any questions on this response, please contact me at (732) 906-6817 or greenlaw.david@epa.gov.

Sincerely,

David Eric Greenlaw, PCB Program Coordinator
Pesticides and Toxic Substances Branch

REMEDIAL ACTION REPORT

River Mews Associates
(Building 12 - Former Alcoa Facility)
700 River Road
Edgewater, New Jersey 07020
(NJDEP #97-6-10-0037-28)

August 2002

ENVIRO-SCIENCES, INC.
111 HOWARD BOULEVARD, SUITE 108
MT. ARLINGTON, NEW JERSEY 07856
(973)398-8183 • (973)398-8037 - Fax

4.0 DESCRIPTION OF REMEDIAL INVESTIGATION

Building 12 is currently standing vacant and partially rehabilitated. All the interior walls have been removed. The exterior walls enclose a space containing two stories. A floor divides this space into two stories. The first story includes a partial basement that underlies the eastern portion of the building. The second story runs the entire length of the building.

On September 17, 1999, the interior surfaces of the exterior walls of Building 12 were tested to determinate if they were contaminated with PCBs. The program consisted of collecting a series of ten core samples.

The cores were collected from approximately one foot above the intersection of the wall and floor. Test locations were biased towards areas of visible staining or discoloration. The differentiation of walls either suspected or not suspected of having PCB contamination was based on their locations. Walls adjacent to floor panels that were removed and were suspected of having been contaminated with low levels of PCBs. Walls adjacent to existing floor panels were determined to be less contaminated. Five cores were collected from exterior wall panels suspected of having elevated concentrations of PCBs. In addition, five additional cores were taken from exterior walls suspected of having minimal PCB contamination.

After collection of each core, sub-samples were taken: the first 2-inch and the second 2-inch segments were harvested. Each was subsequently crushed prior to being sent to the laboratory. The sampling results indicated that all of the cores collected from suspected areas without contamination had PCB concentrations below the 0.49-ppm criteria, both in the surfacial and 2-inch depth samples. As for the areas that were suspected as being contaminated, three of the five surfacial samples had PCB concentrations slightly in excess of the 0.49-ppm criteria. Only one of these samples exhibited contamination in the 2-inch depth section. This last sample was the most visibly stained.

5.0 IMPLEMENTATION OF THE REMEDIAL ACTION WORKPLAN

The proposed Remedial Action to mitigate the PCB contamination in the exterior walls of Building 12 was as follows:

- Wall panels and supporting columns were washed to a height of 8-feet with a water-based soap solution per the paint manufacturer's specification. The wash water was collected and a composite sample was collected by ESI and laboratory tested for PCBs prior to disposal.

- The walls were allowed to adequately dry following wash operations.

- All the wall panels were painted twice with a two-part epoxy-based paint to seal the concrete and brick walls.

- The painted walls will be periodically monitored for cracking, leaks, and structural defects. (Deed Notice)

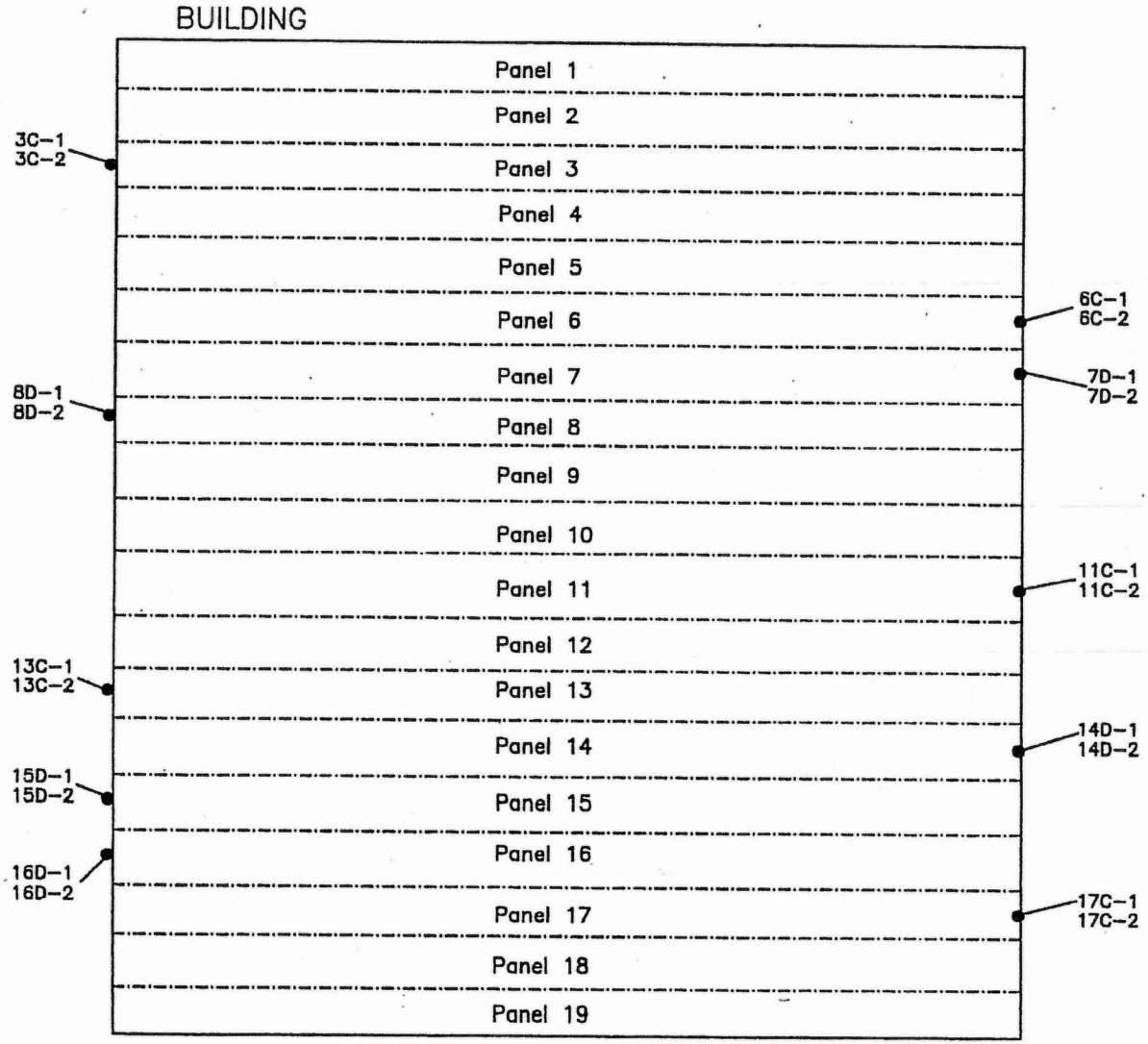
- The general public will be excluded from Building 12 until such a time as the building is rehabilitated or demolished (Deed Notice)

7.0 FINDINGS

The washing of the interior surfaces of the exterior walls of Building 12 have been documented (Attachment 7), as well as the application of the paint specified by the NJDEP. The laboratory analysis of the composite wash water sample indicated that PCB levels (i.e., very low levels) were within an acceptable concentration to allow disposal.

A Deed Notice was prepared for this project that would limit the general public's access to Building 12, until such time as the Notice was removed by agreement between NRMA and the NJDEP. The draft of the Deed Notice is provided as Attachment 4.

With the completion of the remedial activities specified in the RAW and implementation of the Deed Notice, the remediation of Building 12 is now complete.



LEGEND

17C-1
● Sampling Location

NOTES

C = No PCB Contamination
D = PCB Contamination
#1 = 1st two-inches
#2 = 2nd two-inches
Panel width = 18.0'
Drawing not to Scale

FIGURE 3

PCB SAMPLING LOCATIONS

ALCOA
Bergen County New Jersey

ENVIRO-SCIENCES, INC.
111 Howard Boulevard, Suite 108
Mount Arlington, NJ 07856
973-398-8153 • Fax 973-398-8057

DRAWN BY/DATE	APPROVED/DATE	DRAWING NUMBER
LMH/8-25-99		ALC-001

Table 2
Former Alcoa Facility-Building 12
PCB Sampling Results

SAMPLE LOCATION	RESULT
3C-1	0.210 ppm
3C-2	0.250 ppm
6C-1	0.200 ppm
6C-2	0.110 ppm
11C-1	0.120 ppm
11C-2	0.037 ppm
13C-1	0.072 ppm
13C-2	0.250 ppm
17C-1	0.070 ppm
17C-2	0.063 ppm

SAMPLE LOCATION	RESULT
7D-1	0.530 ppm
7D-2	0.370 ppm
8D-1	0.071 ppm
8D-2	0.051 ppm
14D-1	0.057 ppm
14D-2	0.058 ppm
15D-1	0.610 ppm
15D-2	0.460 ppm
16D-1	0.640 ppm
16D-2	0.970 ppm
16D-2L	1.000 ppm

All results are for parameter 1254 Aroclor

C = Sample locations where the floor did not contain staining
D = Sample locations where the floor was removed due to PCB contamination

-1 = Sample obtained at first 2 inches
-2 = Sample obtained at second 2 inches