



**OFFICE OF THE MAYOR
CITY OF CAMDEN
NEW JERSEY**

DANA L. REDD
MAYOR

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November 16, 2017

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

Re: **City of Camden**
EPA Brownfields Cleanup Grant Application
7th and Kaighn Site

Dear Ms. Theodoratos:

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

Pertinent applicant information follows:

- a. Applicant Identification: City of Camden
 City Hall, 520 Market Street, 4th Floor
 Camden, New Jersey 08101

- b. Funding Requested:
 - i) Grant Type: Single Site Cleanup
 - ii) Federal Fund Requested: \$200,000
 - iii) Contamination: Hazardous Substances

- c. Location: The City of Camden, Camden County, New Jersey

- d. Property Information: 7th and Kaighn
 726 Kaighn Avenue
 Camden, New Jersey 08103

EPA Brownfields Cleanup Grant Proposal
City of Camden
7th and Kaighn Site

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

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

Sincerely,



Dana L. Redd
Mayor

Appendix 3

Cleanup Other Factors Checklist

Name of Applicant: City of Camden

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

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

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



State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

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

BOB MARTIN
Commissioner

November 14, 2017

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

RE: City of Camden's USEPA Brownfields Cleanup Grant Application 7th & Kaighn Site, Camden NJ

Dear Administrator Pruitt:

On behalf of the New Jersey Department of Environmental Protection (NJDEP), I strongly endorse the City of Camden's application to the United States Environmental Protection Agency (USEPA) for a Brownfields Cleanup Grant to remediate the environmental impacts associated with discharges of hazardous substances at the 7th and Kaighn Site in Camden, NJ.

The 7th & Kaighn Site is a priority site because of its size, location, proximity to illegal dumping activities, and degradation of local quality of life because of on-site drug use and homeless populations. This USEPA Brownfield Cleanup Grant is a vital step in the process of repurposing this site for the revitalization of this neighborhood.

Thank you for considering Camden's USEPA Brownfields Cleanup Grant application for the 7th & Kaighn Site in Camden, NJ. If you have any questions, please do not hesitate to contact me at William.Linder@dep.nj.gov or via phone at (609) 633-8227.

Sincerely,

William J. Lindner, Manager
Office of Brownfield Reuse

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

CITY OF CAMDEN, NEW JERSEY
US EPA: SITE-SPECIFIC CLEANUP GRANT PROPOSAL
7TH AND KAIGHN SITE
November 16, 2017

I. COMMUNITY NEED

a. Target Area & Brownfields

i. Community and Target Area Descriptions:

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

For the purposes of this grant application, the cleanup activities will be located at a 4.36 acre property located at 726 Kaighn Avenue, known as the 7th and Kaighn site, in Camden, New Jersey. This property, a defunct electroplating facility in Census Tract 6004, is located the Bergen Square neighborhood. Bergen Square is 240 acres in size, is bordered by an interstate highway, and is characterized by large swaths of vacant and abandoned parcels, particularly in the vicinity of the targeted site.

ii. Demographic Information and Indicators of Need: Demographic information presented below compares the target site's Census Tract 6004 to national, state, and county averages. Camden is unquestionably one of the poorest cities in the nation. According to the 2011-2015 American Community Survey (ACS) 5-year estimates, the City's unemployment rate of 19.6% is almost four times the national average. In the targeted community of Census Tract 6004, the unemployment rate is even higher at 26.3%. Camden is plagued with alarming poverty rates. According to the 2011-2015 ACS, the poverty rate (individuals) in Camden is 39.9% and in Census tract 6004 is 46.5%, compared to the overall New Jersey rate of 10.8%. Children are particularly impoverished in Camden. In some neighborhoods, nearly 100% of children live below the poverty line. In the targeted neighborhood, the number of families with single mothers and children under 18 years of age living in poverty is nearly double the state average.

Camden is home to many sensitive populations living amongst brownfields sites, including children, minorities, and non-English speaking residents. According to the 2011-2015 ACS 5-year estimates, Camden includes a minority population (95%) more than double the national and state averages (37.7% and 42.8%, respectively). Likewise, the targeted Census Tract 6004 includes a minority population of 99% and has a large non-English speaking population approaching 50%, almost all of whom are Spanish speaking.

Demographic Information for Camden¹

Demographic Indicator	Census Tract 6004	Camden City	Camden Co.	State of New Jersey	National
Population	3,197	76,904	511,998	8,904,413	316,515,021
Unemployment	26.3%	19.6%	10.2%	8.8%	5.0% ²
Poverty Rate (individuals)	46.5%	39.9%	13.2%	10.8%	15.5%
Percent Minority ³	99%	95.6%	41.5%	42.8%	37.7%
Median Household Income	\$22,335	\$25,042	\$62,185	\$72,093	\$53,889
Families Below Poverty	46.9%	36.7%	10.2%	8.2%	11.3%
Single Mother Households w/Related Children <18 Below Poverty	61%	58.3%	36.6%	33.3%	40.5%
Individuals 65+ Below Poverty	36.9%	29.8%	9.8%	8.0%	9.4%
Per Capita Income	12,987	13,412	30,822	36,582	28,930
Language Other than English	48.6%	45.7%	20.2%	30.5%	21.0%
Households with Individuals <18	43.5%	43.5%	34.0%	34.1%	32.3%
Population 18-64 with Disability	14.8%	16.7%	10.9%	7.7%	10.3%
Population 65+ with Disability	46.9%	48.0%	37.9%	33.0%	36.0%
Population Lacking High School Education	33.6%	32.4%	12.1%	11.4%	13.3%
Households w/No Vehicles Available	26.3%	34.7%	11.7%	11.7%	9.1%

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

²Source Bureau Labor Statistics

³Data represents respondents identifying themselves as a race other than white.

iii. Description of the Brownfields: The targeted property is located in the Bergen Square neighborhood at 7th Street and Kaighn Avenue. The site of a former electroplating facility, CWS Industries, Inc. ceased operations in 2004 on this 4.63 acre site. Prior to the demolition that was completed earlier this year, the site had a sprawling building which ranged from single story in some sections to upwards of five stories. Today the entire block is vacant land. In fact, the surrounding city blocks are also vacant; suspected or known contamination has perpetuated such vacancy and discouraged development. For many years, the property has also served as a haven for the homeless, with a tent city located in the rear of the property.

Bergen Square is home to many brownfields in addition to the targeted site. A 2004 Needs Study for Bergen Square inventoried 147 existing industrial properties in the area, a substantial number of which are vacant. Over 52% of the Bergen Square commercial properties were characterized as vacant. Given the insidious nature of decline here, the percentage of vacancies is believed to have increased since that study was completed.

b. Welfare, Environmental, and Public Health Impacts

i. Welfare Impacts

Residents in the neighborhood of Bergen Square are negatively impacted by constant exposure to contaminated, underutilized land that reinforces community disinvestment and contributes to blight. The major welfare impacts experienced by the residents of Bergen Square include:

- *Crime and Public Safety:* It is well-documented that the presence of brownfields sites negatively impact public safety. Vacant brownfields showcase community disinvestment and become a magnet for social ills such as drug use and crime. According to data provided in the NJ State Police *2014 Uniform Crime Report*, the violent crime rate in Camden (20.2 per 1,000) is more than four times that of Camden County (2.7 per 1,000) and almost 8 times that of the State of New Jersey (2.6 per 1,000). Camden is continually listed in the top 25 of annual CQ Press list of America's Most Dangerous Cities; in 2014, Camden once again held the top spot on the list.
- *Blight:* Large, abandoned, and dangerous properties such as the one to be addressed by this assessment grant contribute to the overall blight of a community. It is estimated that there are over a thousand abandoned properties in the City of Camden. According a 2004 Needs Study, Bergen Square is blighted in large part due to the large swaths of underutilized and abandoned land; approximately 37.4% of all lots are vacant of any structures. In fact, 52.4% of all commercial property was deemed vacant in the neighborhood. This has a negative impact on the quality of life and sense of safety.
- *Homelessness:* The problem of homelessness in Camden is severe, with the 2016 Point in Time survey finding approximately 683 homeless individuals in Camden County. The problem of homelessness is severe in Bergen Square, which is home to a 75+ bed homeless shelter as well as a day homeless service program. Additionally, homeless individuals have developed several “tent cities” throughout the community, including in the targeted property. It has been reported by the local paper, *Courier Post*, that at least 15 people were living at the site prior to the demolition activities.
- *Isolation:* Despite the high population density in the city, Camden also includes very desolate areas. As presented above, the Bergen Square neighborhood contains large swaths of vacant land, a substantial number of which are former industrial sites with suspected contamination. The overall impact of these brownfield sites, particularly as seen from the highway, is that this area is abandoned and uninviting.
- *Unemployment:* More than one out of every four working age adults in the target census tract are unemployed. Unemployment in Camden is a pervasive social problem, exacerbated by a paucity of local job opportunities. A focus on redevelopment of neglected industrial sites such as 7th and Kaighn will enable people to obtain living wage jobs and break the cycle of poverty.

ii. Cumulative Environmental Issues

A major element of the City’s 2015 Master Plan, *FutureCAMDEN*, is to “Maintain and Improve the Environment.” The plan’s first goal under this element is to “clean up and remediate known contaminated sites.” In addition to the environmental concerns related to the site at 7th and Kaighn, the nearly 100% minority population within Bergen Square and the rest of the City contends with the inequitable distribution of environmental burdens. The residents of Bergen Square face a disproportionate share of environmental burdens not experienced in the wealthier, suburban areas of Camden County: a county incinerator plant is located just south of the community; odors from the county sewage treatment plant often impact the area; and water quality challenges are associated with combined sewer systems that are well over 100 years old. Additionally, because of Bergen Square’s proximity to Interstate 676 and multiple congested state highways, residents suffer from a high volume of truck traffic, increased air pollution, and degraded infrastructure while living with vacant or underutilized sites. In 2014, the American Lung Association’s State of the Air report graded Camden County’s air quality an “F.”

iii. Cumulative Public Health Impacts

Camden's residents suffer from the negative environmental impacts of both indoor and outdoor pollutants, caused in part by proximity to current and former industrial uses. Significant public health impacts that *disproportionately impact sensitive populations* in the community include:

- *Lead Exposure:* Lead was widely used in house paints prior to its ban in 1978. Camden has a high percentage of housing built prior to 1980. According to the 2011-2015 ACS 5-Year Estimates, nearly 81.2% of all housing in the City of Camden was built before 1980. According to the Camden County Department of Health and Human Services 2015 Annual Report, there were 11 new active cases of childhood lead poisoning in 2015. High blood lead levels have been documented to impair learning and can therefore impact educational attainment. In addition to lead-based paint in housing, potential sources of lead contamination are the brownfields throughout Camden as lead is a common contaminant of historic fill such as is present at the targeted site.
- *Asthma and Air Pollution:* In 1996, EPA's National-Scale Air Toxics Assessment found that Camden had the highest cancer risk from hazardous air pollutants in the country—1,300 in one million. The New Jersey Department of Environmental Protection (NJDEP)-led Air Toxics Pilot Project concluded that Camden had relatively high particulate levels, some of which included toxic metals like arsenic, cadmium, lead, and nickel, as well as high ambient levels of fine particulate matter detrimental to those citizens with respiratory afflictions. Brownfields interspersed among residences provide potential sources of inorganic contaminates in exposed surface soils. The homeless population at the targeted site is particularly vulnerable to such exposure. According to the New Jersey Department of Health Asthma Awareness and Education Program, the City of Camden has an Asthma Emergency Department visit rate of 2,909 per 100,000 residents (2008-2012), compared to the state average rate of 597 per 100,000.

c. **Financial Need**

- i. Economic Conditions: According to the 2011-2015 ACS 5-year estimates, while the population density of the US is 89.6 people per square mile, New Jersey is more than 13 times denser at 1,210.8 people per square mile, making it the most densely populated state in the nation. Given these numbers, Camden's overall population density is shocking, at 8,621.5 people per square mile, or roughly 100 times denser than the national average. This density, coupled with the disproportionate rates of sensitive, economically disadvantaged populations, results in a higher demand for a wider range of social and economic services per taxable area.

The high degree of poverty in Camden, as discussed above in Section 1.a., combined with the city's population density, creates a large service demand that is not commensurate with the City's available financial resources. This dichotomy of a need for services contrasted with scant resources is further exacerbated by the fact that having a concentration of non-profit social service providers means that more property is occupied by those that do not pay local property taxes, the primary revenue source for most municipalities. Today, almost half of the assessed property value in Camden is exempt from taxation. In Bergen Square, the City owns 17% of the land due to foreclosures and other involuntary takings. Such a formula equates to scarce discretionary revenue streams.

Camden is truly the most distressed city in the state of New Jersey. According to information published by the state's Multi-Year Recovery Plan for Camden, Camden's tax ratable base is the

smallest in NJ on a per capita basis, at approximately one-half that of other cities and one-quarter of Camden County. Given the fiscal state of the city and competing needs for basic services, the City is unable to address these brownfields without outside assistance and relies on federal and state funding sources to investigate and remediate the sites. While the City does have some state funding to address the anticipated remediation costs at the site, the funding is not sufficient to cover the entirety of the cleanup.

ii. Economic Effects of Brownfields: Camden residents are negatively impacted by a cycle of contaminated vacant land that contributes to a number of economic effects, including community blight, depressed property values, and decreased investment in the City.

Community blight delivers a significant economic impact in Camden and Bergen Square. It is estimated that there are over 869 abandoned properties in the City of Camden. According to 2010 Census Data, the City has a vacant housing rate of 13.7% (compared to 9.5% for the State of New Jersey) and only 46% of housing units are owner occupied (compared to 65.4% for the State of New Jersey). Because worker housing was erected in and around factories, many of these vacant units are co-located with brownfields. Because of the high occurrence of rental properties (vs. owner-occupied), the blight around brownfields is further exacerbated by the transient nature of the residential properties. The presence of brownfields throughout the city also results in decreased property values. The median home value in Camden City is \$84,600, compared to \$196,800 in Camden County.

Decreased investment in Camden has been a challenge in the city for many years. Due to a number of factors including the presence of contaminated sites like the site at 7th and Kaighn, there is an unwillingness of developers to invest in the City. Further, brownfields in the city represent lost tax revenue and lost job opportunities. The “2014 Comprehensive Economic Development Strategy” for the Greater Philadelphia region identified Camden as economically “distressed” per EDA regulations: per capita income is 80 percent or less than the national average; the average unemployment rate over the most recent 24-month period for which data is available is at least one percentage point greater than the national average; or the area has a “special need,” as determined by EDA.

The Economic Opportunity Act of 2013 sought to create a more business-friendly climate by increasing tax incentives for companies to set up shop in New Jersey. Companies have begun to take advantage of these generous incentives and development in some areas of Camden has begun in earnest. However the City struggles to ensure that portions of the city are not left behind during this building boom, and that there are available sites to continue to attract this investment. As most of these incentives expire in 2019, there is significant time pressure to attract developer investment as quickly as possible. Thus, municipal cleanup of brownfields are more critical than ever, as the City works to maintain this forward momentum and not lose these recent advances. Remediation and redevelopment of brownfield sites in Camden is still an uphill battle, as the negative value of the real estate in the city means many property owners are underwater and that public subsidy is still needed to leverage private redevelopment.

II. **PROJECT DESCRIPTION & FEASIBILITY OF SUCCESS**

a. **Project Description**

- i. **Existing Conditions:** The 4.63 acre targeted property is located in the Bergen Square neighborhood at 7th Street and Kaighn Avenue. The site of a former electroplating facility, CWS Industries, Inc. ceased operations in 2004. The property was vacated and abandoned. There have been no known uses since it closed. The site previously contained a large industrial building, which was demolished in April 2017. The building was constructed sometime between 1954 and 1962. In addition to the electroplating business, prior uses included a linoleum manufacturing plant. For many years, the property has served as a haven for the homeless, with a tent city located in the rear of the property and many additional individuals squatting inside in dangerous conditions.

Previously conducted assessment work identified recognized environmental conditions including historic fill, a former gasoline underground storage tank (UST), debris pile, former benzene storage areas and a naphtha tank. In 2011, EPA conducted an emergency removal action, removing over 80 containers of acids, metals, cyanide, hexavalent chrome, ammonia and sodium hydroxide.

The site is an active case with the NJDEP (PI No. 171844). The former owner conducted limited sampling in July 2009 and results identified the presence of acids, metals, cyanide, hexavalent chromium, ammonia and sodium hydroxide in various locations across the site. Groundwater has not been characterized at the site. In 2011, EPA conducted an emergency removal action, removing over 80 containers of acids, metals, cyanide, hexavalent chromium, ammonia and sodium hydroxide. In addition, sand piles and loose floor sludge were characterized as hazardous waste for cadmium concentrations and were disposed. Liquid waste was also pumped from the building's basement at this time.

- ii. **Proposed Cleanup Plan:** Additional delineation work is underway at the site. A Licensed Site Remediation Professional (LSRP) has recently been procured and has begun work on the site. Upon completion of the additional assessment work, a Remedial Action Workplan will be developed. While all areas of concern have not been fully characterized, it is assumed that at a minimum, historic fill will need to be addressed along with the proper closure of the gasoline UST. The soil remediation is expected to be a combination of excavation and disposal of contaminated soil hotspots associated with the UST and placement of an engineered cap and institutional controls to address historic fill. Like all sites in Camden, groundwater is expected to be contaminated. The site's groundwater will be addressed with an institutional control, an indefinite term Classification Exception Area (CEA). The CEA will be established for the site to prevent future groundwater use and will be subjected to long term monitoring. All remediation to be performed under this grant would be conducted in accordance with the New Jersey Site Remediation Reform Act, N.J.S.A. 58:10 et seq. and the Technical Requirements for Site Remediation, N.J.A.C. 7:26 et seq., under the oversight of the site's LSRP with EPA Region 2 personnel proving a level of regulatory review.

- iii. **Alignment with Revitalization Plans:** The vision for the 7th and Kaighn property is the creation of an industrial park to bring living wage manufacturing jobs back to the City. The City of Camden's 2015 Master Plan, *FutureCamden* identifies a key economic development goal of

“maintaining and attracting job generating businesses.” In order to realize this goal of improving and expanding the City’s job base, additional sites for modern industrial development are needed. Assembling land and developing an industrial park has the advantages of providing larger parcels with adequate infrastructure and improved security. Brownfield sites play a critical role in providing additional acreage for new industrial development; nowhere else in the city are there such large, contiguous swaths of vacant former industrial property. The portion of Bergen Square adjacent to Interstate 676 presents an opportunity for such an industrial park. An on-ramp for I-676 borders the 7th and Kaighn site and will provide easy access to an existing transportation network. While existing utilities are present, construction of state of the art new industrial facilities will provide an opportunity to upgrade the old, combined sewer system in the community, improving the existing neighborhood while still capitalizing on the existing infrastructure. The City of Camden was awarded a HUD CHOICE Implementation Grant. This CHOICE grant will focus on providing healthy, affordable housing in the neighborhood adjacent to Bergen Square. By preparing the 7th and Kaighn site to attract light industrial developers/ end users, the City of Camden will leverage HUD’s nearby residential investment and provide places to work close to where people live.

b. Task Description & Budget Table

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

Task 1 – Cooperative Agreement Oversight and Community Outreach

To ensure the smooth management of the grant, compliance with all reporting and procurement requirements, and timely completion of project tasks, we are in the process of entering an interlocal agreement to have the Camden Redevelopment Agency (CRA) oversee the implementation of the remediation for 7th and Kaighn. CRA routinely undertakes environmental assessment and remediation activities as part of their role to facilitate redevelopment in Camden.

The CRA will provide project management services to manage contractors and act as a liaison with NJDEP. The CRA will also continue to work with the community regarding the remediation and redevelopment of the site. The CRA Project Manager will attend local outreach meetings as well as meet with community leaders to ensure the public is aware of the ongoing activities and has the opportunity to raise any concerns during the implementation of the workplan. This includes the establishment and maintenance of a public document repository.

For this project, CRA will engage a professional grant management consulting firm that has experience in federal grants management that will: assist in the procurement of the LSRP/ environmental engineering consultant and remediation contractor; work with the NJDEP and EPA to ensure all environmental and grant requirements are met; and perform all grant budget tracking, compliance, and reporting activities. The firm will be competitively retained in accordance with all federal, state, and local procurement requirements.

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

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

Task 2 – Environmental Engineering

A qualified environmental engineering firm will be procured to provide direct project oversight and management of the remediation effort; prepare state required Public Notification documentation (signage and notification filing); prepare the Remedial Action Workplan (RAW); and serve as the New Jersey Licensed Site Remediation Professional (LSRP). A deed notice for the soil will provide record of the contaminants and the concentrations that were left in place, and controlled by the cap. The LSRP will prepare a Remedial Action Report (RAR), and corresponding Response Action Outcome (state case closeout document). Activities under this task also include payment of the associated NJDEP Annual Remediation Permit fee and other required document review fees.

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

Task 2 Budget – Environmental Engineering				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual: Remedial Action Workplan	1	LS	\$ 10,000	\$ 10,000
Contractual: Remedial Action Report / RAO	1	LS	\$ 15,000	\$ 15,000
Contractual: Deed Notice	1	LS	\$ 4,000	\$ 4,000
Other: Annual Remediation Permit	3	LS	\$ 5,000	\$ 15,000
Other: SRRA Forms and Certifications	1	LS	\$ 3,500	\$ 3,500
Contractual: Public Notification	1	LS	\$ 1,500	\$ 1,500
Task 2 Total:			\$ 49,000	
AMOUNT TO BE FUNDED BY EPA GRANT:			\$ 49,000	

Task 3 – Soil Remediation

Activities conducted under this task include the preparation of bid specifications and construction documents to assist with procuring a contractor to perform the soil remediation; oversite of the remediation contractor; site preparation activities; closure of the underground storage tank (UST) and removal and disposal of impacted soils (for budgeting purposes, 400 tons of contaminated soil is estimated); removal and disposal of an estimated 300 tons of historic fill to maintain site elevations; and installation of a soil cap, where appropriate. Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility. This task will also include post-excavation sampling and analysis, the emplacement of clean backfill, and all New Jersey fees, forms or certifications. An engineered cap will be designed and installed to provide a barrier to the contaminants in site soils. The cap will be

installed where soil contaminants remain at concentrations above NJDEP soil remediation standards for direct contact.

The outputs for this task consist of number of bid specifications; tons of impacted soil removed; tons of certified clean fill brought onto the site as the cap; and acres of brownfields readied for redevelopment.

Task 3 Budget – Soil Remediation				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual: Prepare Remediation Bid Specification	1	LS	\$ 12,000	\$ 12,000
Contractual: Oversight of Remediation Contractor	320	Hrs	\$ 75	\$ 24,000
Contractual: Abandon/Close UST	1	LS	\$ 15,000	\$ 15,000
Contractual: Cap Impacted Soil	1	LS	\$ 10,000	\$ 10,000
Contractual: UST Impacted Soil Removal & Disposal	400	TONS	\$ 100	\$ 40,000
Contractual: Historic Fill Impacted Soil Removal & Disposal	300	TONS	\$ 100	\$ 30,000
Other: NJ-required permitting fees	1	LS	\$ 14,000	\$ 14,000
Contractual: Site Restoration (backfill, topsoil & seed)	1	LS	\$ 14,000	\$ 14,000
Contractual: Final As-built Survey	1	LS	\$ 5,000	\$ 5,000
Task 3 Total:				\$ 164,000
AMOUNT TO BE FUNDED BY EPA GRANT:				\$ 112,500

Task 4 – Groundwater Remediation (Classification Exemption Area)

Because groundwater is contaminated throughout Camden, an institutional control in the form of an indefinite duration groundwater Classification Exception Area (CEA) will be implemented. The CEA will provide limitations to on-site activities and uses of groundwater which might otherwise provide a route of exposure to the site contaminants. This will include two rounds of sampling and analysis from on-site wells.

The outputs for this task are the number of CEAs issued.

Task 4 Budget – Groundwater Remediation (Classification Exemption Area)				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual: Establish CEA	1	LS	\$ 13,000	\$ 13,000
Contractual: Sampling and Analysis of existing wells (2 rounds) inc QA/QC	2	EA	\$ 3,000	\$ 6,000
Task 4 Total:			\$ 19,000	
AMOUNT TO BE FUNDED BY EPA GRANT:			\$ 19,000	

iii. Budget Table

Categories	Project Tasks				Total
	Task 1	Task 2	Task 3	Task 4	
	Cooperative Agreement Oversight	Environmental Engineering	Soil Remediation	Groundwater Remediation	
Personnel					\$0
Fringe Benefits					\$0
Travel					\$0
Equipment					\$0
Supplies					\$0
Contractual	\$7,500	\$30,500	\$138,500	\$19,000	\$195,500
Other (specify)	\$12,000	\$18,500	\$14,000		\$44,500
Total	\$19,500	\$49,000	\$152,500	\$19,000	\$240,000
EPA	\$19,500	\$49,000	\$112,500	\$19,000	\$200,000
Cost Share	\$0	\$0	\$40,000	\$0	\$40,000

c. **Ability to Leverage:**

The EPA funding will leverage prior and future sources from the City and the City's partners to ensure successful assessment, and cleanup of the 7th and Kaighn site. The EPA grant will be matched by State ERB funding. Documentation of leveraged funding and resources can be found in **Attachment 1** and include:

Source	Purpose/Role	Amount	Status
State	Demolition	\$743,000	Awarded/Expended
EPA Site Specific Grant	Assessment Funding	\$350,000	Awarded
State ERB	Remediation Grant	\$100,00	Pending ERB Approval (includes contingency)
State ERB	Development	\$170,836	Pending ERB Approval
Total Leveraged Funding:			\$1,363,836

Additionally, the City of Camden was awarded a \$13.2 million HUD CHOICE Implementation Grant. This CHOICE grant will focus on providing healthy, affordable housing in the neighborhood adjacent to Bergen Square.

The New Jersey Economic Development and Growth Program administered by the New Jersey Economic Development Agency (NJEDA) is also an incentive for developers and businesses to address revenue gaps in development projects. This program has special dispensations for qualifying economic development projects in Camden, such as the creation of industrial parks, proving an incentive grant reimbursement of up to 40% of the total project cost. As remediation is an eligible activity for the project cost basis, this is a powerful incentive in the city.

IV. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

Community involvement is a vital component of Camden's Brownfields Program. Typically, both the City and the CRA work with the local neighborhood group on issues pertaining to brownfield redevelopment. However, in this area of Bergen Square where there are whole city blocks of vacated land, there is no centralized community galvanized around the challenges of redeveloping the 7th and Kaighn site. While there is a group of transient homeless individuals living at the site, there are no residential buildings. As such, the City will continue efforts to communicate information about the site to the general public via postings on its website, discussions at meetings attended by the public such as planning board, city council meetings, CRA board meetings, etc. We will also reach out to social service groups prior to site mobilization to see what assistance they can provide for the transient individuals on the site.

In order to provide an avenue of communication should any residents or others have issues with the cleanup activities, two signs, one in English and the other in Spanish, will be posted at the site. They will contain the telephone number of the LSRP and of the CRA Project Manager so that any issue may be reported directly to those that can address it.

During remediation activities, the remediation contractor will be required to conduct perimeter air monitoring. This will mitigate the potential for fugitive dust to leave the site. Site work will also be subject to soil erosion and sediment control measures. These measures will prohibit soil from leaving the site.

South Jersey's largest newspaper, the *Courier-Post*, is the most appropriate and effective local newspaper through which to communicate information about community meetings regarding the 7th and Kaighn site. In addition, the CRA engages local community groups to distribute flyers and get the word out via blogs and posts on websites and community Facebook pages regarding progress, meetings, and opportunities for engagement.

As Camden has a large Spanish speaking population, the CRA recognizes the importance of outreach programs to non-English speaking residents, through the provision of meeting announcements in Spanish and assistance to residents who require translations. Providing such announcements in Spanish is something the CRA has done previously for brownfields and other redevelopment-related information, and we will continue to do so.

b. Partnerships with Governmental Agencies

The State of New Jersey's voluntary cleanup program was replaced by the Licensed Site Remediation Professional (LSRP) Program in 2009. An LSRP will be retained by CRA to provide oversight, certification, and observation services for all environmental remediation work at the site and certify and approve all reports and submittals as required by NJDEP regulation. That being said, NJDEP continues to serve an active partner with assisting the CRA address brownfields, providing technical assistance and support for many of the large-scale brownfield redevelopment projects in Camden. In fact, Camden is one of only three communities in the state designated by the NJDEP as a "Community Collaborative Initiative" city, whereby priority project receive special assistance and attention from the department, to include a dedicated state representative, priority access to funding, and expedited permitting considerations.

The CRA will partner with EPA Region 2 for environmental activities overseen by the LSRP. As such, the CRA will be working with EPA to ensure the investigation and eventual remediation work will address contamination in a manner protective of human health and the environment. To this end, we meet with our EPA Project Officer on a quarterly basis and will continue to do so. The CRA also partners with other federal agencies like HUD, which has an office in Camden and provided funding for the CHOICE effort. We also partner with the New Jersey Economic Development Agency for development-related funding such as the Economic Development and Growth Program presented in the Leveraging section. Under this grant, these relationships will be continued and strengthened as the project progresses.

c. Partnerships with Community Organizations

i. Community Organization Descriptions & Roles: The CRA has developed strong partnerships with many community organizations, and the following organizations will play a key role in the successful implementation of the EPA funding for the 7th and Kaighn site:

- **Camden Smart (Stormwater Management and Resource Training):** Camden Smart focuses on green infrastructure programs and projects in the city. They will provide technical assistance and aid in green infrastructure design assistance during assessment and redevelopment planning process.
- **Center for Family Services (CFS):** A human services agency providing assistance to youth and families, CFS serves as the convening partner for the City's Promise Zone. They will assist with providing information to their stakeholders about the project and with coordination of Promise Zone initiatives with the efforts to remediate and redevelop the targeted site.
- **Coopers Ferry Partnership:** A nonprofit organization dedicated to carrying out development projects across the city, CFP will assist with technical assistance and outreach to community members about the project.
- **Heart of Camden:** This nonprofit rehabilitates homes for low-income families and will assist the project by using its network to keep the community informed and engaged.
- **Joseph's House of Camden:** A 75+ bed homeless shelter located within the Bergen Square community, Joseph's House. The CRA will work with Joseph's House as a resource for finding appropriate services and shelter for the homeless men and women currently using the building at 7th and Kaighn as shelter.
- **New Jersey Conservation Foundation:** This non-profit works to preserve open space and natural resources. Given their office in Camden, they will assist with community outreach.
- **Salvation Army Ray and Joan Kroc Corps Community Center:** The Kroc Center, once a landfill itself, houses an array of programs and is an important partner and anchor for the community. The will assist with outreach and by providing meeting space.
- **Respond Inc:** As a local social service agency providing a host of services to Camden residents, including child care, senior services, and job training, RESPOND is a valuable partner in the community. RESPOND will partner with the CRA to ensure community awareness of the cleanup and redevelopment of the site. Further, participants in RESOND's job training programs could be hired to help with grant-funded activities on the site at 7th and Kaighn.
- **Rutgers University (RU):** With a campus anchored in Camden, RU has been a valuable partner with advancing community revitalization initiatives in Camden. RU will support the project through outreach support about grant activities to students, staff, and the community.

ii. Letters of Commitment: See **Attachment 2** for Commitment Letters.

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

V. PROJECT BENEFITS

a. Welfare, Environmental, and Public Health Benefits

Receipt of EPA funding will facilitate the remediation of the site at 7th and Kaighn, leading ultimately to its redevelopment. The removal of contamination and elimination of exposure pathways will have a positive impact on the welfare, environment, and health of the community. The following impacts are anticipated:

Welfare Impacts

- *Crime and Public Safety.* As previously noted, it is well-documented that the presence of brownfields sites negatively impacts public safety, and Camden is no different. The eventual redevelopment of the property at 7th and Kaighn into a productive industrial site would remove a potential location for illegal activity and improve public safety in the community.

- *Blight.* This project is expected to have a positive benefit on the quality of life of the current occupants of Bergen Square by the development of a positive industrial or commercial site. This project is expected to have a positive benefit on the quality of life of the neighborhood's residents by removing a blight that currently encourages illicit activities, including vandalism, illegal dumping, and drug use. Redevelopment of this large parcel is expected to reduce crime in the area.

- *Homelessness.* Currently the site of a "tent city" for several homeless individuals, this site is a dangerous and unhealthy environment for this vulnerable population. Removing this contamination and redeveloping the site will allow the social services within Camden to more effectively reach and assist these individuals, to allow them to be relocated to a healthier area.

Cumulative Environmental Issues:

- *Disproportionate share of environmental burdens:* The remediation and redevelopment of the site at 7th and Kaighn would remove one more environmental burden from Bergen Square. Replacing a contaminated, abandoned property with an industrial park will alleviate a major environmental justice element in the community.

Cumulative Public Health Impacts:

- *Lead Exposure:* Cleanup of brownfields sites removes lead contamination from the community. The cleanup of the target site's historic fill, lead being a common constituent in Camden's historic fill, will decrease the amount of lead in the community, therefor decreasing the risk for lead exposure among the children and families in the city.

- *Asthma and Air Pollution:* Potential exposures to contaminants will be eliminated such as those posed by the site's contaminants. It is expected that this will lower the documented asthma and air pollution risk from hazardous air pollutants observed as fugitive dust containing toxic metals will be remediated.

b. Economic and Community Benefits

Based on the recent success story of the new HOLTEC manufacturing development in Camden, it has been projected that at least 87 permanent, living wage positions could be created, should this 4.36 acre site be redeveloped for manufacturing. In a city like Camden with endemic unemployment and poverty, this is substantial and of primary importance to the community. Prior to demolition and foreclosure, the taxes on the property were in excess of \$17,000/year. It is expected that when redeveloped with a higher and better use, the amount of collectable revenue that the city would receive would be at least three times this amount.

VI. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**a. Audit Findings:**

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

b. Programmatic Capability

The City is in the process of entering into an interlocal agreement with the City of Camden Redevelopment Agency (CRA) to manage the remediation effort at the 7th and Kaighn site. The CRA staff has managed more than 35 brownfield sites through the state regulatory process and possesses the in-house capacity to oversee the community outreach activities, coordinate with the environmental regulators, and interface with the developers for the brownfields redevelopment efforts. These staff members not only provide the in-house contractor procurement and management of environmental engineering firms, but they also perform the administrative functions associated with pursuing, receiving and using the state investigation funds. James Harveson, Director of the CRA’s Division of Economic Development, has been overseeing brownfield remediation projects in Camden for more almost a decade, and he will continue to serve as the Project Manager of the this cleanup grant. Mr. Harveson has nearly 30 years’ experience in the areas of urban redevelopment and previously served as the Director of the City of Trenton’s Department of Housing and Development, where he was recognized in New Jersey as an innovator in the area of brownfield redevelopment.

To expand their capacity to address the 7th and Kaighn site and increase the number of brownfields being addressed at any given time, the CRA has contracted with an experienced environmental management firm to provide assistance. This firm assists with programmatic activities like EPA reporting, preparation of site eligibility requests, and budget oversight. This management structure ensures that turnover at the CRA will not negatively impact the Brownfields Program.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes

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

d. Past Performance & Accomplishments

i. Currently or Has Received an EPA Brownfield Grant:

1. Accomplishments

Please see summary table below for the City's EPA Brownfields Cooperative Agreement.

2. Compliance with Grant Requirements

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

Grant & Period of Performance	Funds Remaining	Compliance with Requirements	Accomplishments
Knox Meadows II Cleanup Grant BF96267217 10/1/17-9/30/20	\$200,000	All grant requirements to date, consisting of the cooperative agreement package, have been met.	These funds just became available as of 10/1/17. The City has been working with the CRA to get an interlocal agreement in place to spearhead the cleanup.
EPA Pilot Awards BP 99254301 10/1/96-9/30/09	\$0 out of \$743,517 awarded	All grant requirements fulfilled and complied with final, approved grant work plan.	PA/Phase I Reports: four Supplemental SI/Phase II Reports: one SI/ Phase II Scope of Work: one Supplemental RI Workplans: three SAMP/QAPPs: six RI Workplan: one Risk Assessment: one Land Use Planning Report: one IPA: one

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



ATTACHMENT 1

**DOCUMENTATION OF
LEVERAGED FUNDING**

MAR:dh
12-13-16

**RESOLUTION IMPOSING A LIEN ON THE PROPERTY AT 726 KAIGHN AVENUE,
BLOCK 405, LOT 1, BASED ON EXPENSES INCURRED BY THE CITY OF CAMDEN
IN DEMOLISHING THE STRUCTURE ON THE PROPERTY, REMOVAL OF DEBRIS
AT THE PROPERTY AND FINAL RESTORATION AND GRADING OF THE
PROPERTY AFTER DEMOLITION**

WHEREAS, on August 15, 2016, the City of Camden Construction Official determined that the building structure at 726 Kaighn, Block 405, Lot 1, constituted an unsafe structure; and

WHEREAS, on August 15, 2016, the City of Camden Construction Official issued a Notice of Unsafe Structure for this unsafe building structure; and

WHEREAS, the City of Camden Construction Official provided this Notice of Unsafe Structure to the owner of the property; and

WHEREAS, the owner of the property at 726 Kaighn Avenue, Block 405, Lot 1, was ordered by the Construction Official to demolish the unsafe structure by no later than September 5, 2016; and

WHEREAS, the owner of the property at 726 Kaighn Avenue, Block 405, Lot 1, while being advised by the Construction official of the need to promptly act has failed to demolish the unsafe structure thereby causing the City of Camden to hire a demolition contractor subsequent to a public bidding process, at a cost of \$743,000 for demolition, removal of debris at the property and final restoration and grading of the property site; and

WHEREAS, Winzinger, Inc. has been approved by the City of Camden for the demolition, removal of debris and final restoration and grading of the property at 726 Kaighn Avenue, Block 405, Lot 1 at a cost of \$743,000; and

WHEREAS, the City of Camden is permitted by New Jersey law, N.J.S.A. 40:48-1.1 et seq. and the City of Camden Code to impose a municipal lien on 726 Kaighn Avenue, Block 405, Lot 1, against the property for the City's costs of \$743,000 being incurred for the demolition contractor, Winzinger, Inc.; now therefore

BE IT RESOLVED, by the City Council of the City of Camden as follows:

1. Upon execution of the contract with the contractor, Winzinger, Inc., the appropriate person in City of Camden shall have the authority to impose and record a lien against 726 Kaighn Avenue, Block 405, Lot 1, for the demolition, removal of debris and final restoration and grading of the property at 726 Kaighn Avenue in the amount of \$743,000.
2. The municipal lien in the amount of \$743,000 shall remain on this property until the owner or other interested party satisfies this amount.
3. Interest and other costs shall accrue on the \$743,000 lien as allowed by law.
4. The City shall also have the authority pursuant to N.J.S.A. 40:48-1.1 and the Camden City Code to enforce the costs for the demolition, removal of debris and final restoration and grading of the property at 726 Kaighn Avenue, Block 405, Lot 1, of \$743,000, together with interest, as a debt of the owner of the property by instituting an action at law for the collection of these sums.

BE IT FURTHER RESOLVED, that pursuant to N.J.S.A. 52:27BBB-23, a true copy of this Resolution shall be forwarded to the State Commissioner of Community Affairs, who shall have ten (10) days from the receipt thereof to veto this Resolution. All notices of veto shall be filed in the Office of the Municipal Clerk.



Brownfields 2017 Assessment and Cleanup Grant Fact Sheet

Camden Redevelopment Agency, NJ

EPA Brownfields Program

EPA's Brownfields Program empowers states, communities, and other stakeholders to work together to prevent, assess, safely clean up, and sustainably reuse brownfields. A brownfield site is real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. In 2002, the Small Business Liability Relief and Brownfields Revitalization Act was passed to help states and communities around the country cleanup and revitalize brownfields sites. Under this law, EPA provides financial assistance to eligible applicants through four competitive grant programs: assessment grants, revolving loan fund grants, cleanup grants, and job training grants. Additionally, funding support is provided to state and tribal response programs through a separate mechanism.

Assessment Grant

\$350,000 for hazardous substances

EPA has selected the Camden Redevelopment Agency for a brownfields assessment grant. Site-specific hazardous substances grant funds will be used to conduct Phase I and Phase II environmental site assessments at the 7th and Kaighn Street site at 726 Kaighn Avenue. The 4.4-acre site was formerly an electroplating facility, which stopped operating in 2004. Grant funds also will be used to conduct cleanup planning and support community outreach activities, including publishing materials in Spanish.

Cleanup Grant

\$200,000 for hazardous substances

EPA has selected the Camden Redevelopment Agency for a brownfields cleanup grant. Hazardous substances grant funds will be used to clean up Lots 13-17 of the Harrison Avenue Landfill Site at the corner of East State Street and Harrison Avenue. The lots total 1.4 acres and are part of an 83-acre former city dump, which is contaminated with chlorinated volatile organic compounds, semi-volatile organic compounds, and dieldrin. Grant funds also will be used to conduct community outreach activities, including publishing materials in Spanish.

Contacts

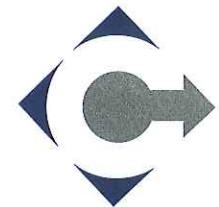
For further information, including specific grant contacts, additional grant information, brownfields news and events, and publications and links, visit the EPA Brownfields Web site (<http://www.epa.gov/brownfields>).

EPA Region 2 Brownfields Team
(212) 637-3283

EPA Region 2 Brownfields Web site
(<https://www.epa.gov/brownfields/brownfields-and-land-revitalization-new-jersey-new-york-puerto-rico-and-us-virgin>)

Grant Recipient: Camden Redevelopment Agency, NJ
(856) 757-7600

The information presented in this fact sheet comes from the grant proposal; EPA cannot attest to the accuracy of this information. The cooperative agreement for the grant has not yet been negotiated. Therefore, activities described in this fact sheet are subject to change.



**Camden
Redevelopment
Agency**

November 15, 2017

The Honorable Mayor Dana Redd
520 Market Street
City Hall
Camden, New Jersey 08101 – 5120

Dear Mayor Redd,

**RE: 726 Kaighn Avenue
EPA Clean Up Grant Application
Leveraged Funding**

As you know, the City of Camden Redevelopment Agency (CRA) is a committed partner for assisting the City of Camden with its efforts to revitalize our great city. Please allow this letter to serve as documentation of funding for the above referenced project.

The state Economic Recovery Board (ERB) had previously provided funding for the Campbell's Soup Expansion – Utility Relocation Project in the form of a Gateway Infrastructure Grant (#P18198). As the Campbell's project has been completed under budget, the CRA had petitioned the ERB on August 21, 2017 to reallocate the surplus funding of \$270,836 to the 7th and Kaighn project.

The petition has been favorably received by the ERB. By all indications from ERB staff, we expect to receive the authorization to reallocate the funding at the upcoming December ERB board meeting. The funding allocation would allow for the following:

- \$ 100,000 for remediation
- \$ 170,836 for supporting redevelopment (relocation of end users, infrastructure, etc.)

Please contact me at (856) 757-7600 should you require any further information.

Sincerely,

Olivette Simpson
Interim Executive Director

111517v1



ATTACHMENT 2

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COMMITMENT LETTERS



November 13, 2017

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

Dear Mayor Redd,

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

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

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

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

Sincerely,

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



PREVENTION | INTERVENTION | EDUCATION

WWW.CENTERFFS.ORG

November 13, 2017

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

Dear Mayor Redd,

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

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

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

Regards,

Richard Stagliano
President/CEO



COOPER'S FERRY PARTNERSHIP

LIVE | WORK | INVEST | CAMDEN

November 13, 2017

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

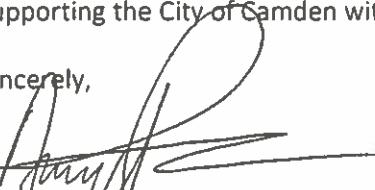

Dear Mayor Redd:

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

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

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

Sincerely,


Anthony Ferno III, Esq.

CEO



November 14, 2017

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

Dear Mayor Redd:

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

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Morales".

Carlos Morales
Executive Director



'Caring for God's Presence in our Midst'

JOSEPH'S HOUSE OF CAMDEN, LLC
JOHN KLEIN, EXECUTIVE DIRECTOR
856.246.1087
jk@jhoc.org
20 Church Street
Camden, NJ 08105
<http://www.jhoc.org>

November 9, 2017

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

Dear Mayor Redd,

I write this letter in support of the Camden Redevelopment Agency's proposal for an EPA Brownfields Cleanup Grant for the property at 7th and Kaighn Avenue in Camden, NJ. This property is abandoned, is in need of remediation and, unfortunately, has become a place of refuge, unsafe refuge, for the homeless of Camden who are in need of shelter.

As a provider of shelter and services to the homeless, Joseph's House supports efforts to clean up abandoned buildings and provide safe, dignified housing alternatives to people in need. Therefore, Joseph's House supports the efforts of the Camden Redevelopment Agency in its efforts to secure the funds necessary to remediate the property at 7th and Kaighn.

It is my hope that the proposal of the Camden Redevelopment Agency meets with success and that the necessary funds are granted so that the hazardous conditions that exist at 7th and Kaighn can be remediated. This will be a benefit to the entire community, and we assure that we will help work with the community any way we can.

Respectfully,

John Klein
Executive Director

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



November 10, 2017

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

Dear Mayor Redd,

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Olivia Glenn".

Olivia Glenn
Regional Manager, South Jersey Metro



The Salvation Army

Ray and Joan Kroc
Corps Community Center

William Booth
Founder

André Cox
General

William A. Bamford III
Territorial Commander

Ivan K. Rock
Divisional Commander

ADVISORY BOARD

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Dan Paulson

David A. Rapuano

Melinda Sanchez

Frank X. Simpson

Jack Tarditi

Liz Thomas

Dr. Thomas J. Venables

November 8, 2017

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

Dear Mayor Redd,

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

LIFE MEMBERS

Hank Mölle

C. Carney Savery

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

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

Blessings!

Sincerely,

Major Terry Wood



Respond, Inc.

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



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

WILBERT MITCHELL
 Executive Director

November 13, 2017

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

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

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

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

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

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

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

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

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

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

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

Dear Mayor Redd,

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

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

Respond has previously worked with Camden Redevelopment Agency on brownfields efforts. It is my understanding that the Agency is now applying for an EPA clean-up and investigation grant for the 7th and Kaighn property. This location has become a landmark for the recognizable, abandoned building located on site, but is also known for its high level of contamination and homeless population.

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

Regards,

Wilbert Mitchell
 Executive Director

Celebrating 50 years of services to the Community!



Office of the Chancellor
Rutgers, The State University of New Jersey
303 Cooper Street
Camden, NJ 08102

gaines@camden.rutgers.edu
856-225-6174
Fax: 856-225-6482
<http://www.camden.rutgers.edu/>

November 13, 2017

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

Dear Mayor Redd,

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

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

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

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

Sincerely,

Larry Gaines
Senior Vice Chancellor for Administration and Finance



ATTACHMENT 3

THRESHOLD ELIGIBILITY

Threshold Criteria, 7th and Kaighn Laboratories Site**1. Applicant Eligibility**

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

2. Site Ownership The City of Camden foreclosed and acquired title on this parcel on November 3, 2017. Please see **Attachment 3.1**.**3. Basic Site Information**

- (a) The site is known as 726 Kaighn Avenue (7th and Kaighn) site.
- (b) The site address is 726 Kaighn Avenue, Camden, NJ 08103. The targeted site is described as City of Camden Block 405, Lot 1.
- (c) The current owner of the site is the City of Camden.
- (d) Not applicable.

4. Status and history of contamination at the site (a) The site is contaminated by hazardous substances. (b) The 4.63 acre site was a former electroplating facility, CWS Industries, Inc. which ceased operations in 2004. Prior uses included a linoleum manufacturing plant. Earlier this year, a sprawling building which ranged from single story in some sections to upwards of five stories was demolished. Today the entire block is vacant and the back of the property is used unauthorized by the homeless as a tent city. (c) Environmental concerns include a former gasoline underground storage tank (UST), contaminated historic fill and groundwater. (d) Prior sampling conducted at the site identified the presence of acids, metals, cyanide, hexavalent chromium, ammonia and sodium hydroxide in various locations as a result of industrial manufacturing of linoleum and electroplating metals.**5. Brownfields Site Definition** (a) The site is not listed, nor is it proposed for listing, on the National Priorities List. (b) The site is not believed to be subject to Federal unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. (c) The site is not subject to the jurisdiction, custody, or control of the US government.**6. Environmental Assessment Required for Cleanup Proposals** The site is currently an active case with the New Jersey Department of Environmental Protection (NJDEP) Site Remediation Program (SRP) with Program Interest (PI) No. 171844 and a Licensed Site Remediation Professional (LSRP) has begun additional assessment work for the site. The former owner conducted sampling in July 2009 (Phase II equivalent) and results identified the presence of acids, metals, cyanide, hexavalent chromium, ammonia and sodium hydroxide in various locations across the site resulting from industrial manufacturing of linoleum and electroplating metals. In 2011, EPA conducted an emergency removal action, removing over 80 containers of acids, metals, cyanide, hexavalent chromium, ammonia and sodium hydroxide. In addition, sand piles and loose floor sludge were characterized as hazardous waste for cadmium concentrations and were disposed.

7. **Enforcement or Other Actions** There were prior state enforcement actions taken against the prior property owner. The city is not currently aware of any ongoing or anticipated environmental enforcement actions associated with the site.
8. **Sites Requiring a Property-specific determination** It is not believed that a Property-Specific Determination is needed.
9. **Site Eligibility and Property Ownership Eligibility**
 - (a) **Property Ownership Eligibility**
 - (1) **CERCLA §107 liability:** The City is not potentially liable for contamination at the site under CERCLA Section §107 as we believe that we qualify for a liability defense. Compliance with the required liability defense provisions are presented below.
 - (2) **Information on liability and the defenses/protection:**
 - a. Information on the Property Acquisition:
 - i) How Property was Acquired: The City of Camden acquired the property via foreclosure for unpaid taxes.
 - ii) Date of Acquisition: The City of Camden acquired the property on November 3, 2017.
 - iii) Nature of Ownership: The City is sole owner of the property (fee simple).
 - iv) Name of party from whom property was acquired: N/A Property was foreclosed.
 - v) Relationship with Prior / Former Owner: The City does not have contractual relationships with any prior owners and/or operators of the site.
 - b. Timing and /or Contribution Toward Hazardous Substances Disposal: All known disposal of hazardous substances at the site occurred before the City acquired the property. The City did not cause or contribute to the release of hazardous substances at the site. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
 - c. Pre-Purchase Inquiry: Not applicable as the City did NOT purchase the property.
 - d. Post-Acquisition Uses: Since acquiring the property, additional investigations are slated to be conducted at the site. The City has not permitted any operations or uses at the site.
 - e. Continuing Obligations: The City has continued to conduct assessment work at the site even prior to foreclosing on the property. Earlier this year, the City

demolished the abandoned industrial building in an effort to staunch the dumping activities and unauthorized site access. The City hopes to obtain EPA cleanup grant funds to remove the highest levels of contamination and prevent exposure to residual site contaminants from the abandoned gas storage tank, impacted soil and groundwater, allowing for the property to be redeveloped. Furthermore, the City has not permitted any operations on the targeted site so as to avoid unintentional exposure to existing contamination. The City is committed to complying with all land-use restrictions and institutional controls required at the site, as well as to assisting and cooperating with those performing the cleanup and providing access to the property. In addition, the City will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and will provide all legally required notices.

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

10. Cleanup Authority and Oversight Structure

a. The cleanup of this site will be required to be conducted under the oversight of a Licensed Site Remediation Program (LSRP). The City will partner with EPA Region 2 for environmental activities overseen by the LSRP. As such, the City will be working with EPA to ensure the remediation work will address contamination in a manner appropriate to the planned site reuse and protective of human health and the environment. The City of Camden Redevelopment Agency (CRA) provides assistance to the City. The CRA routinely undertakes environmental assessment and remediation activities as part of their role to facilitate redevelopment in Camden. We are in the process of entering into an interlocal agreement to have the CRA oversee the implementation of the remediation for the Camden Labs project. All remediation to be performed under this grant would be conducted in accordance with the New Jersey Site Remediation Reform Act, N.J.S.A. 58:10C-1 et seq.; the Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-12 and implementing regulations in the Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C; and the Technical Requirements for Site Remediation, N.J.A.C. 7:26E, under the oversight of a Licensed Site Remediation Professional (LSRP).

b. The City has broad rights to access the property for redevelopment purposes, including environmental testing. While the preferred option will be to talk to neighboring property owners and negotiate voluntary access, in the event that there is evidence that contamination may have migrated off-site, both the City and the State of New Jersey have the authority to enter neighboring properties and conduct required sampling.

11. Community Notification

a. A draft Analysis of Brownfield Cleanup Alternatives (ABCAs) was prepared for the site and can be found in **Attachment 3.2**. It outlines the contamination and issues of the site, offering three alternatives approaches for its clean up, of which Alternative #1 is recommended. We provided an opportunity for the community to learn of our intent to

apply for this cleanup grant and solicited public comments for incorporation into the grant application as well as the draft ABCA. A project fact sheet was prepared and distributed to assist with communication about the grant application and to solicit public comments.

- b. The community notification advertisement was published November 2, 2017 in the local *Courier-Post*.
- c. On November 9, 2017, the City of Camden and the CRA held a public meeting to discuss this grant application. No stakeholders attended the meeting. In order to solicit further public comments, the application will be provided for review and comment even after the application is submitted to EPA.
- d. Associated documentation is found in **Attachment 3.3**.

12. Statutory Cost Share

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



ATTACHMENT 3.1

**THRESHOLD
ELIGIBILITY: SITE
OWNERSHIP**

Brett Wiltsey (012322001)
DILWORTH PAXSON LLP
A Pennsylvania Limited Liability Partnership
LibertyView
457 Haddonfield Road, Suite 700
Cherry Hill, NJ 08002
(856) 675-1900
Attorneys for Plaintiff, City of Camden City

CITY OF CAMDEN CITY, A Municipal Corporation of the
State of New Jersey,

Plaintiff,

vs.

1. Block 157, Lot 11.02, a/k/a Lot 11, f/k/a Lot 50
551 S. 2nd Street

Assessed to Goldstein, Norman;

2. Block 340, Lot 35
1306 S. 6th Street

Assessed to South Camden Investment Corporation;

5. Block 359, Lot 26
809 S. 9th Street

Assessed to Winston, Robert-Est Of;

7. Block 334, Lot 35
1223-1225 Broadway
Assessed to Penn Fish Company, Inc.;

10. Block 1351, Lot 42
1197 Chase Street
Assessed to Joyner, Robert J.;

11. Block 1351, Lot 43
1199 Chase Street
Assessed to Joyner, Robert & Barbara;

12. Block 1354, Lot 49
1225 Chase Street
Assessed to Khan, Abdu, Jamil & Rakhshinda;

13. Block 388, Lot 86 & QB01 & BO2
701-703 Chestnut Street
Assessed to Grayson, Daniel R.;

SUPERIOR COURT OF NEW JERSEY
CAMDEN COUNTY
CHANCERY DIVISION

Docket No. F-012720-17
CIVIL ACTION

**FINAL JUDGMENT, AS TO
SCHEDULE #24, UNITED
DEVELOPMENT, LLC, ONLY**

(2nd Amended Tax Foreclosure List
#190)

18. Block 1348, Lot 15
1445 Crestmont Avenue
assessed to Frazier, Denise R.;

20. Block 1364, Lot 181
1277 Decatur Street
Assessed to Minzer, Leon; et al;

21. Block 1364, Lot 149
1281 Decatur Street
Assessed to Harrowgate Realty Inc.;

22. Block 1343, Lot 115
1293 Everett Street
Assessed to Pritchett, Robert F.;

24. Block 405, Lots 1,7, 8 & 11
726 Kaighn Avenue
Assessed to United Development, LLC;

39. Block 1342, Lot 100
1539 Louis Street
Assessed to Cisrow, Bob;

42. Block 1354, Lot 155
1570 Louis Street
Assessed to Al-Ibrahim, Farouk;

87. Block 1302, Lot 1
NW Chestnut & Orchard Streets
Assessed to Chestnut Realty Assn.;

88. Block 347, Lot 18
SE Broadway & Lansdowne Avenue
Assessed to Hood, Robert;

Defendants.

This cause being opened to the Court by Brett Wiltsey, Esquire, attorneys for plaintiff, and it appearing that plaintiff filed its complaint pursuant to the provisions of N.J.S.A. 54:5-104.29 et seq., as amended and the rules of this court governing such practice and procedure to foreclose in rem, certain Tax Sale Certificates as follows:

<u>Schedule Number</u>	<u>Recorded in register of Camden County Mortgage Book & Page</u>	<u>Name of Owner as it appears on last tax duplicate</u>	<u>Description of land as it appears on tax duplicate and in certificate of tax sale</u>
24	Book 4828, Page 915	United Development, LLC	Block 405, Lots 1, 7, 8 & 11 726 Kaighn Avenue

and that notice of this foreclosure suit in the form prescribed by said statute and the rules of this court was published once in the *Courier Post*, a newspaper circulating in the City of Camden City, the municipality wherein the lands to be affected are located, and it further appearing that no answer has been filed in this cause by any persons having or claiming to have a right, title or interest in or to, or lien upon any parcel of land described in the complaint filed herein within the time fixed by said statute, and it appearing that the plaintiff has filed a copy of the complaint and all amendments thereto, in the Office of the Tax Collector of the City of Camden City, and in the Office of the Register of the County of Camden, and in the Office of the Attorney General of the State of New Jersey, and the court having read and considered the verified complaint filed herein, together with the proofs of publication, mailing and posting of said notice of foreclosure, and the affidavit showing that there has been no redemption of the Tax Sale Certificate; and the court being satisfied and having determined that there has been a compliance with said statute;

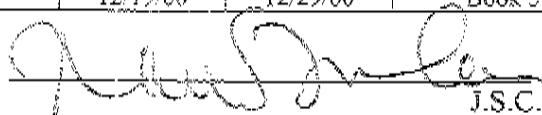
IT IS thereupon, on this 3rd day of Nov, 2017;

ORDERED AND ADJUDGED that all persons having a vested or contingent title or interest in or lien or claim upon or against said lands, including the State of New Jersey, and any agency and political subdivision thereof, and their heirs, devisees and personal representatives and their or any of their heirs, devisees, executors, administrators, grantees, assigns or successors in right, title or interest, be barred of the right of redemption and be foreclosed of all prior or subsequent alienations and descents of said lands and encumbrances thereon, and that an

absolute and indefeasible estate of inheritance in fee simple in said lands be vested in the plaintiff, the City of Camden City; and

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

Sch. No.	Transferee or Purchaser of Title	Dated	Date Recorded	Deed Book/Page
24	United Development, LLC	12/19/00	12/29/00	Book 5132, Page 263



J.S.C.



ATTACHMENT 3.2

**THRESHOLD
ELIGIBILITY: ABCA**

Analysis of Brownfields Cleanup Alternatives

DRAFT

7th and Kaighn Site
726 Kaighn Avenue
Camden, New Jersey
Block 405, Lot 1

Prepared by BRS, Inc. for the

City of Camden
520 Market Street
City Hall, 4th Floor
Camden, NJ 08101

November 2017



DRAFT
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ATTACHMENTS

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

1 INTRODUCTION & BACKGROUND

The City of Camden is undertaking the environmental cleanup of the 7th and Kaighn site. The subject site is a 4.36 acre property located at 726 Kaighn Avenue, known as the 7th and Kaighn site, in Camden, New Jersey. This property, a defunct electroplating facility in Census Tract 6004, is located the Bergen Square neighborhood. Bergen Square is 240 acres in size, is bordered by an interstate highway, and is characterized by large swaths of vacant and abandoned parcels, particularly in the vicinity of the targeted site.

The purpose of the environmental cleanup is to prepare the property for future redevelopment as an industrial park to bring living wage manufacturing jobs back to the City. Assembling land and developing in an industrial park has the advantages of providing larger parcels with adequate infrastructure and improved security. Nowhere else in the city are there such large, contiguous swaths of vacant former industrial property than in the Bergen Square neighborhood. The City of Camden was recently awarded a HUD CHOICE Implementation Grant. This CHOICE grant will focus on providing healthy, affordable housing in the neighborhood adjacent to Bergen Square. By preparing the 7th and Kaighn site to attract light industrial developers/ end users, the City of Camden will leverage HUD's nearby residential investment and provide places to work close to where people live.

The City of Camden has applied to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant in the amount of \$200,000 to assist with the environmental remediation of the 7th and Kaighn site. If successful in this application, the City of Camden will enter into a Cooperative Agreement with the USEPA, which will enumerate the terms and conditions for the City of Camden's use of the brownfields cleanup grant funds, including a commitment by the City of Camden to provide for community involvement in the process.

The City of Camden has contracted Brownfield Redevelopment Solutions, Inc. (BRS), to prepare this Analysis of Brownfields Cleanup Alternatives (ABCAs) in conformance with requirements of the Cooperative Agreement. The purpose of this ABCA is to present to the community the following items:

- A description of the environmental conditions at the 7th and Kaighn site, based on the findings of the environmental assessment activities performed to date.
- A selection of implementable remediation alternatives that considers effectiveness, costs, and sustainability while addressing any contamination identified at the 7th and Kaighn site.
- An analysis of the various factors influencing the selection of a preferred remediation method, including site and contamination characteristics (i.e., exposure pathways, identification of contaminant sources, etc.); cleanup standards; potential future uses of the property; and cleanup goals.

These items are discussed in the following sections of this ABCA.

The City of Camden will promote and facilitate community involvement with the environmental cleanup and site redevelopment project with the activities itemized below.

- The City of Camden will perform targeted outreach to notify communities of the availability of this Draft ABCA. This includes fulfillment of the New Jersey Department of Environmental Protection community notification requirements (N.J.A.C. 7:26E-1.4). The City of Camden will publish a notice of availability of this Draft ABCA in one or more major local newspapers with general circulation in the target community.
- The City of Camden will provide an opportunity for members of the public to comment on the ABCA in a public meeting. Additional details regarding the public notification process will be presented in a *Community Relations Plan* to be prepared for the site.
- The City of Camden will prepare written responses to the comments received and document any changes made to the cleanup plans and to the ABCA as a result of the comments.

A Brownfields Cleanup Decision Memo will be prepared at the end of the public comment process, which will describe the cleanup options selected by the City of Camden. The ABCA and the Decision Memo will be included with the Administrative Record. The Administrative Record repository is located at the offices of the City of Camden.

1.1 Site Description and Previous Uses

The targeted property is located in the Bergen Square neighborhood at 7th Street and Kaighn Avenue. The site of a former electroplating facility, CWS Industries, Inc. ceased operations in 2004. The Site previously contained a large industrial building, which was demolished in April 2017. The building was constructed sometime between 1954 and 1962 and was used for an electroplating business. Prior to construction of the recently demolished building, the Site contained several large warehouse structures that were part of a linoleum plant. For many years, the property and building have served as a haven for the homeless, with a tent city located in the rear of the property and many additional individuals squatting inside in dangerous conditions.

1.2 Surrounding Land Use

The properties adjoining the Site are residential and commercial. Several churches and abandoned buildings are located to the north, the Victory Garage auto body shop and a radio tower are located to the west, and vacant, grassy land followed by Interstate Highway 676 is located to the east and south.

1.3 Summary of Environmental Conditions

The site is an active case with the NJDEP (PI No. 171844). The former owner conducted limited assessment sampling in July 2009 and results identified the presence of acids,

metals, cyanide, hexavalent chromium, ammonia and sodium hydroxide in various locations across the site. In 2011, EPA conducted an emergency removal action, removing over 80 containers of acids, metals, cyanide, hexavalent chromium, ammonia and sodium hydroxide. In addition, sand piles and loose floor sludge were characterized as hazardous waste for cadmium concentrations and were disposed. Liquid waste was also pumped from the building's basement at this time.

A June 2017 Phase I Environmental Site Assessment (ESA) was recently completed at the site. Several recognized environmental conditions were identified including the following:

- Documented Historic Fill
- Former gasoline underground storage tank (UST)
- Debris Pile
- Former Benzene Storage Areas and Naphtha Tank
- Former Industrial Use of the Site

Remedial activities have been performed at the Site as indicated above. A Preliminary Assessment conducted in conformance with New Jersey Department of Environmental Protection requirements is underway. Due to the planned redevelopment of the site, a more complete characterization of the environmental conditions previously identified at the site is required.

1.4 Project Goals/ Property Reuse Plan

The vision for the 7th and Kaighn property is the creation of an industrial park to bring living wage manufacturing jobs back to the City. The City of Camden's 2015 Master Plan, *FutureCamden* identifies a key economic development goal of "maintaining and attracting job generating businesses." In order to realize this goal of improving and expanding the City's job base, additional sites for modern industrial development are needed. Assembling land and developing in an industrial park has the advantages of providing larger parcels with adequate infrastructure and improved security. Brownfield sites play a critical role in providing additional acreage for new industrial development; nowhere else in the city are there such large, contiguous swaths of vacant former industrial property.

The portion of Bergen Square adjacent to Interstate 676 presents an opportunity for such an industrial park. An on-ramp for I-676 borders the 7th and Kaighn site and will provide easy access to an existing transportation network. While existing utilities are present, construction of state of the art new industrial facilities will provide an opportunity to upgrade the old, combined sewer system in the community, improving the existing neighborhood. The City of Camden was recently awarded a HUD CHOICE Implementation Grant. This CHOICE grant will focus on providing healthy, affordable housing in the neighborhood adjacent to Bergen Square. By preparing the 7th and Kaighn site to attract light industrial developers/ end users, the City of Camden will leverage

HUD's nearby residential investment and provide places to work close to where people live.

The subject parcel's soil is impacted by historic fill material along the southern portion of the Site as shown on the State historic fill map. Therefore, site soils are likely contaminated with metals and polycyclic aromatic hydrocarbons (PAHs) as well as other site-specific contaminants to be determined during additional remedial investigations planned for the site. The remedy for site soil will include excavation and disposal of any identified contamination "hot-spots", followed by installation of permeable and impermeable caps during the redevelopment and execution of a deed notice.

The site's groundwater may contain dissolved concentrations of metals, consistent with the historic fill material identified in the soil. As a result, an indefinite term Classification Exception Area (CEA) may be established for the site to prevent future groundwater use.

The proposed cleanup activities for which EPA funding will be used include: potential remediation of "hot spot" soil including excavation, engineering and institutional controls, and groundwater remediation through an institutional control. Additional tasks associated with the cleanup for which EPA funding is requested include: cooperative agreement oversight, public engagement, remediation oversight, and compliance with NJDEP permitting requirements.

The objectives of this cleanup project are to complete the selected remedial actions:

- in accordance with the Site Remediation regulations and Cleanup Standards (as described in Section 2) of the New Jersey Department of Environmental Protection (NJDEP), which will provide regulatory oversight of the project; and
- in accordance with the various applicable regulations of the USEPA, and with the terms and conditions of the CRA's Cooperative Agreement with USEPA.

The expected outcomes of the project include an Entire-Site Response Action Outcome (RAO) letter to be issued by a New Jersey Licensed Site Remediation Professional (LSRP).

1.5 Physical Setting

The site property is flat and consists of vacant, grassy land. The topographic gradient of the immediate surrounding area slopes generally to the west towards the Delaware River. The Delaware River is located approximately 4,300 feet to the west.

The Site is located within a mapped outcrop of the Potomac Formation. The Potomac Formation comprises the base of the Potomac-Raritan-Magothy (PRM) aquifer, which is an important public water resource of the New Jersey Coastal Plain. In New Jersey, the Cretaceous-aged PRM is generally considered a single hydrogeologic unit or aquifer system (Fusillo, Voronin, 1980). There are several physically distinguishable units within the PRM aquifer system; however, individual formations may not be distinguishable over

wide areas. Generally, lower, middle, and upper sand and gravel aquifers separated by clay-and-silt confining units have been recognized.

There are no surface water bodies located on the Site. The Delaware River is located approximately 4,300 feet to the west.

1.6 Exposure Pathways

In order for contaminants from a site to pose a human health or environmental risk, one or more completed exposure pathways must link the contaminant to a receptor (human or ecological). A completed exposure pathway consists of four elements:

- A source and mechanism of substance release;
- A transport medium;
- A point of potential human or ecological contact with the substance (“exposure point”); and
- An “exposure route”, such as dermal contact, ingestion, etc.

Preliminary evaluation indicates the following potentially completed exposure pathways related to the site in its current condition (i.e., pre-remediation):

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

2 APPLICABLE LAWS AND CLEANUP STANDARDS

All site remediation to be performed under this grant would be conducted in accordance with the New Jersey Site Remediation Reform Act, N.J.S.A. 58:10C-1 et seq.; the Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-12 and implementing regulations in the Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C; and the Technical Requirements for Site Remediation, N.J.A.C. 7:26E. The most current versions of the NJDEP Technical Guidance documents will be referenced, including:

- *Historic Fill Guidance Document,*
- *Capping of Sites Undergoing Remediation,*
- *Presumptive and Alternate Remedy Guidance Technical Guidance Document,* and
- the various other NJDEP guidance documents applicable to the project.

The reference remediation standards for soil will be NJDEP's current version of published numeric values for Non-Residential Direct Contact Soil Remediation Standards (NRDCSRS), NJDEP's Residential Direct Contact Soil Remediation Standards (RDCSRS), and Impact to Groundwater Soil Remediation Standard (IGWSRS).

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

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

3 EVALUATION OF CLEANUP ALTERNATIVES

This section identifies various reasonable remediation alternatives that were considered in response to the environmental contamination issues at the site. The following potential remedial alternatives were considered:

- Alternative No. 1) Institutional and Engineering Controls,
- Alternative No. 2) Removal of historic fill site-wide, and
- Alternative No. 3) No action.

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

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

3.1 Alternative No. 1 - Institutional and Engineering Controls

Under this alternative, the remedial action will include hot-spot remediation, followed by installation of permeable and impermeable caps as Engineering Controls, and recording of a deed notice and a classification exemption area (CEA) as Institutional Controls. This combination of remedies will prevent exposure to residual site contaminants. Work will be performed by a qualified remediation contractor procured in accordance with all applicable local, state, and federal requirements.

Further details of the remediation plan would include:

- Removal of the former gasoline UST in accordance with regulations and address impacted soils.
- An estimated total of 700 tons of contaminated soil and debris will be removed and disposed of off-site. The task will also include post-excavation sampling and analysis and the emplacement of clean backfill. Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility.
- An engineered cap will be designed and installed, to provide a barrier to the contaminants in site soils. The cap will be comprised of a mixture of permeable (e.g., imported clean soil) and low permeability (e.g., paved areas and new building structures) materials, and will be installed in any areas of the site in which soil contaminants remain at concentrations above NJDEP soil remediation standards.
- The ongoing protectiveness of the engineering controls will be ensured by development of, and adherence to, an Operation and Maintenance Plan. Ongoing operation and maintenance of the cap will be performed.
- The Institutional Controls will consist of a deed notice attached to the deed in perpetuity. The deed notice will provide notice of the contaminants and the concentrations that were left in place, and controlled by the Cap. In addition, an indeterminate Classification Exception Area (CEA) will be established to prohibit groundwater use on the site.

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

3.1.1 Effectiveness

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

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

3.1.2 Sustainability and Resilience

This criterion evaluates the degree to which the remedial alternative may reduce greenhouse gas discharges, reduce energy use, employ alternative energy sources, reduce

volume of wastewater to be disposed, reduce volume of materials to taken to a landfill, and/or allow for the reuse or recycling of materials during cleanup is considered, where applicable.

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

3.1.3 Implementability

Cap placement is easily and rapidly implementable because it involves relatively simple technology and equipment. This type of remedy is a widely used and readily accepted alternative for remediating and encapsulating contaminated soils. The City of Camden and/or its consultant will retain a contractor that is licensed, qualified, and OSHA-certified to perform work on hazardous materials sites. The deed notice and CEA, prepared in accordance with NJDEP guidance and template, are relatively routine administrative submissions.

3.1.4 Operation and Maintenance

Operation and Maintenance on the installed soil cap should include the following:

- Routine inspections
- Vegetation maintenance (grass mowing and weed control)
- Written O&M Plan that includes a discussion including but, not limited to; soil cover maintenance, reporting, maintenance agreement, a utility plan should future utilities or building be proposed at the Site, and fence maintenance (if applicable).

3.1.5 Institutional Controls

This alternative will require the following Institutional Controls:

- A Deed Notice is required because contaminants above the RDCSRS and NRDCSRS are expected to remain below the soil cap. A Deed Notice is required to document the extent of contamination and the engineering controls and will be issued pursuant to N.J.A.C 7:26E-6.1(B).
- All required NJDEP permits, reporting, and inspection requirements.
- A CEA for groundwater.

3.1.6 Cost

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

- 1) Retain environmental engineering firm and LSRP, and LSRP review of previous reporting;
- 2) Project and Grant Management tasks, including public notification;

- 3) Prepare project specifications and bid documents;
- 4) Prepare Quality Assurance, and Health and Safety deliverables;
- 5) Conduct procurement process;
- 6) Install site security fencing for duration of project activities;
- 7) Preliminary excavation and removal of UST, hot spots and historic fill;
- 8) Procurement and testing of clean fill cap materials;
- 9) Emplacement of a cap over impacted areas of the site;
- 10) Site restoration, including vegetative cover;
- 11) Prepare Deed Notice;
- 12) Prepare Soil Remediation Permit;
- 13) Prepare Remedial Action Workplan;
- 14) Prepare Remedial Action Report, Response Action Outcome and other regulatory reporting requirements.

The estimated cost for this cleanup alternative is \$251,500. The USEPA cleanup grant contribution would be \$200,000. The City of Camden cost share would provide the remaining \$51,500 from other funding sources.

3.2 Alternative No. 2 - Removal of Historic Fill and Hot Spot Soil Site-wide

Under this alternative, the remedial action will consist of removal of 1,500 tons of debris and contaminated historic fill down to native materials, estimated to be at a depth of 10 feet along the southern edge of the site, and replacement with clean soil fill. Selection of this alternative is expected to result, upon completion, in unrestricted future use of the site. No engineered cap would be installed, as no contaminated materials would remain on site. No Institutional Controls would be needed as removal of impacted soil is expected to remediate groundwater.

3.2.1 Effectiveness

This alternative would be immediately effective by removal of the potential continuing contaminant sources associated with the presence of historic fill from the site. The remedial action should result in unrestricted use of all areas of the site.

3.2.2 Sustainability and Resilience

The “Removal of Historical Fill and Hot Spot Soil Site-wide” alternative compares unfavorably to Alternative 1 (described in Section 3.1) with regard to sustainability metrics. The approach would result in increased energy use, greenhouse gas emissions, and landfill disposal volume. It is expected to compare favorably to Alternatives 1 and 3 in resilience metrics, such as the continuing protectiveness of the remedy in light of reasonably foreseeable changing climate conditions.

3.2.3 Implementability

This alternative is feasible and implementable. This approach will involve the work elements described in Section 3.1, with the exception of the emplacement of a clean soil cap and deed notice, plus these additional elements:

- 1) Excavation of site debris piles and soil to a depth of approximately 10 fbg, and transport to an appropriately licensed disposal facility.
- 2) Backfill of all excavated areas with clean soil fill.

3.2.4 Operation and Maintenance

This approach, upon successful implementation, would allow for unrestricted use of the site. No ongoing operation and maintenance of remedial systems would be required.

3.2.5 Institutional Controls

This approach, upon successful implementation, would provide for the removal of all contaminated soil from the site. No Deed Notice is required. As the current presence of historic fill materials is the presumed reason that a groundwater CEA may be required under other scenarios, a CEA would not be required if the historic fill is removed from the site.

3.2.6 Cost

To implement this strategy, approximately 1,500 tons of debris and soil would be excavated, disposed, and replaced with clean fill. Total project costs for this alternative are estimated at \$486,270.

3.3 Alternative No. 3 - No Action

If no environmental cleanup remedy were performed at this site:

- The site would remain out of compliance with NJDEP's regulations;
- Expanded site investigation and risk assessment activities would be needed to further define site conditions and potential risks, and to evaluate the potentially completed exposure pathways described in Section 1.6; and

3.3.1 Effectiveness

The "no action" alternative is not effective in that it does not provide for compliance with NJDEP regulations and it fails to provide for the beneficial reuse of the site.

3.3.2 Sustainability and Resilience

The "no action" approach would not meet project remediation goals because the contamination would remain in place, untreated, and without a barrier. As such, the "no action" approach would present a continuing risk to the public. Based on this, evaluation of the approach with regards to other sustainability criteria is not relevant.

3.3.3 Implementability

The “no action” alternative is technically feasible, although the presence of untreated soil and groundwater contaminants would not be in compliance with NJDEP regulations.

3.3.4 Operation and Maintenance

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

3.3.5 Institutional Controls

Because there is no remedy implemented, there would be no institutional controls at the Site.

3.3.6 Cost

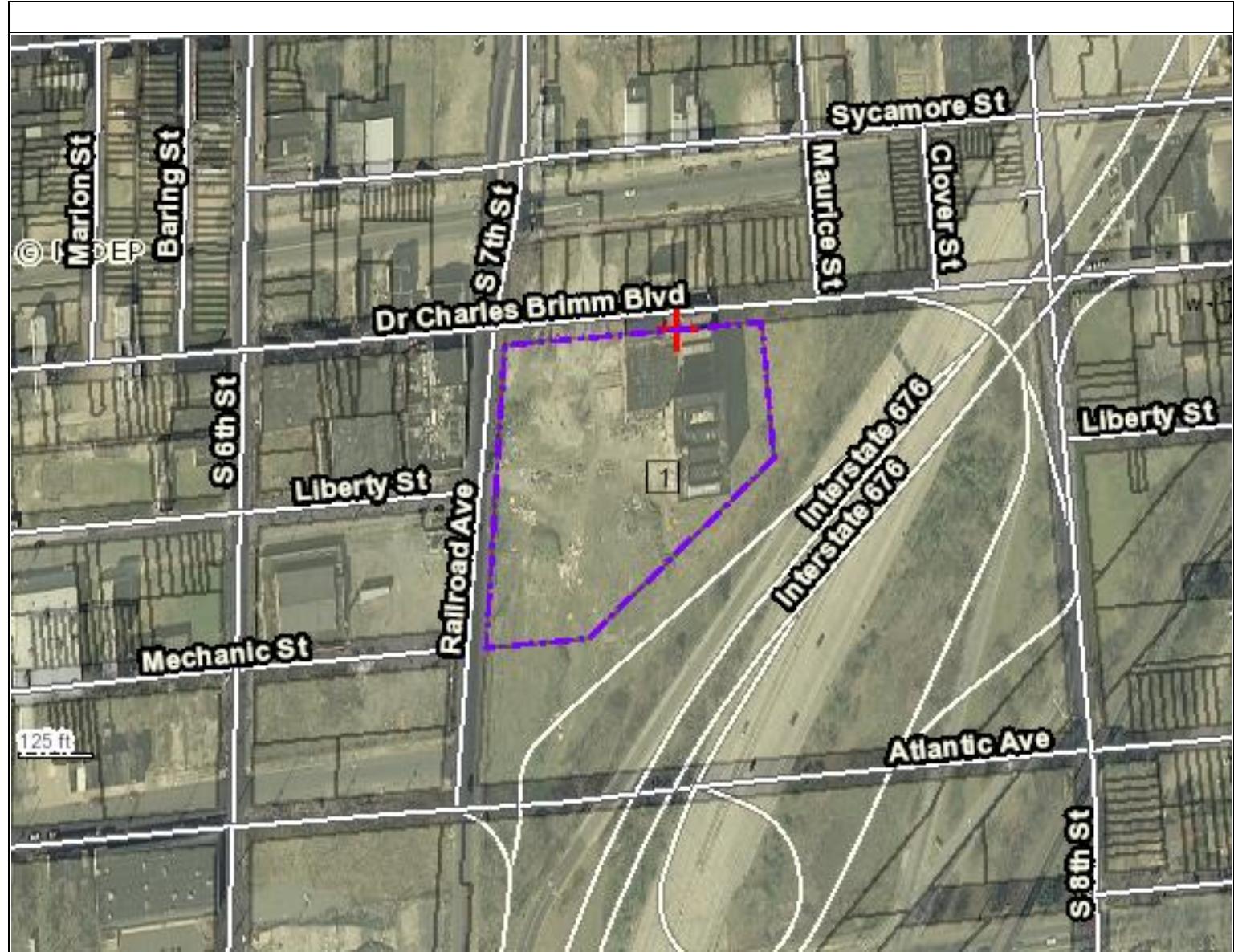
There would be no costs associated with this alternative.

3.4 Preferred Alternative

The preferred alternative is Alternative No. 1- Institutional and Engineering Controls. Soil excavation is a proven method, easily and quickly implementable, environmentally effective, and cost-effective. Excavation equipment is readily available. Soil excavation and emplacement of a cap, along with implementation of a groundwater CEA, is accepted by the NJDEP as a remedy for historic fill contamination. This remedy can be readily completed within the timeframe of the USEPA Brownfields Grant.

ATTACHMENT A
Site Location Map





1 Municipal Code: 0408, Block: 405, Lot: 1, Owner: UNITED DEVELOPMENT, LLC

Map Printed On {2016-12-12 12:03}

Legend

GeoWeb

Parcels Data (Block and Lot)

Counties

Mid-Atlantic States

New Jersey

Other Mid-Atlantic States



ATTACHMENT 3 .3

**THRESHOLD
ELIGIBILITY:
COMMUNITY
NOTIFICATION**

COURIER-POST

NOV 13 REC'D

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

Agency:

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

ATTN: SULENA ROBINSON-RIVERA

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

Acct No: CHL-087266

Acct: CHL-087266

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

Run Dates: 11/02/17

Check #: _____

Date: _____

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

SIGNATURE: _____

TITLE: _____ DATE: _____

CERTIFICATION BY APPROVAL OFFICIAL

I CERTIFY AND DECLARE THAT THIS BILL OR INVOICE IS CORRECT, AND THAT SUFFICIENT FUNDS ARE AVAILABLE TO SATISFY THIS CLAIM. THE PAYMENT SHALL BE CHARGEABLE TO:

APPROPRIATION ACCOUNT(S) AND AMOUNTS CHARGED: P.O. # _____

SIGNATURE: _____

TITLE: _____ DATE: _____

CLAIMANT'S CERTIFICATION AND DECLARATION:

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

Date: 11/02/2017

Federal ID #: 061032273

Signature: _____

Official Position: Clerk

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

AFFIDAVIT OF PUBLICATION

Publisher's Fee \$17.16 Affidavit \$30.00

State of New Jersey
Camden County

} SS.

Personally appeared Sandy Kamel

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

11/02/17 A.D 2017

Mary Jo Szwak
Notary Public of New Jersey

Ad Number: 0002507615



Ad Number: 0002507615

Run Dates: 11/02/17

Public Notice

US Environmental Protection
Agency
Brownfields Grant Application

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

(\$17.16)

0002507615-01

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

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

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

Discussion

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

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

The meeting adjourned at 2:00pm.

14. Areas Affected by Project:

Camden, New Jersey



Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<input type="text"/>
* 3. Date Received:		4. Applicant Identifier:
<input type="text" value="11/16/2017"/>		<input type="text"/>
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
<input type="text"/>		<input type="text"/>
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Camden"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="21-6000418"/>		* c. Organizational DUNS: <input type="text" value="0770695810000"/>
d. Address:		
* Street1:	<input type="text" value="520 Market Street, City Hall Room 213"/>	
Street2:	<input type="text" value="P.O. Box 95120"/>	
* City:	<input type="text" value="Camden"/>	
County/Parish:	<input type="text" value="Camden County"/>	
* State:	<input type="text" value="NJ: New Jersey"/>	
Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="08101-5120"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Department of Finance"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="Glynn"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Jones"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Director of Finance"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="(856) 757-7582"/>		Fax Number: <input type="text" value="(856) 757-7354"/>
* Email: <input type="text" value="g1jones@ci.camden.nj.us"/>		

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-09

* Title:

FY18 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

SF424 - Areas Affected.pdf

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Camden FY18 EPA Brownfields Cleanup Grant - 7th and Kaighn

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
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17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="40,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="240,000.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on .
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes No

If "Yes", provide explanation and attach

<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
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21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed: