Analysis of Brownfields Cleanup Alternatives

Camden Laboratories 1667 Davis Street (Block 1392, Lot 33) Camden, New Jersey

Prepared by BRS, Inc. for the

The City of Camden 520 Market Street City Hall Camden, New Jersey

October 2020

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A. Site Location Map

B. Summary of Public Comments and Responses



1 INTRODUCTION & BACKGROUND

The site is located at 1667 Davis Street in the City of Camden, Camden County, New Jersey and is described as Lot 33, Block 1392 by the City of Camden for tax purposes. It is in the Whitman Park neighborhood of Camden, NJ on an irregularly-shaped parcel, approximately 3.9 acres in area.

The City of Camden Redevelopment Agency (CRA) has contracted Brownfield Redevelopment Solutions, Inc. (BRS), to prepare this Analysis of Brownfields Cleanup Alternatives (ABCA) in support of the EPA Cleanup Grant BF-96258700 and Brownfield Revolving Loan Fund (RLF) BF-96286914 funding. The purpose of the ABCA is to:

- Identify reasonable brownfields cleanup alternatives considered for addressing the contamination identified at the site;
- Analyze the various factors influencing the selection of a preferred cleanup method, including effectiveness, implementability, costs, and sustainability;
- Select the preferred cleanup method, based on the analyses performed; and
- Provide community outreach and solicit public participation and comment on the remedial selection process prior to the final decision.

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

- The CRA will perform targeted outreach to notify communities of the availability of this ABCA. This includes fulfillment of the New Jersey Department of Environmental Protection community notification requirements (N.J.A.C. 7:26E-1.4). The CRA has published a notice of availability of the draft ABCA in the local newspapers with general circulation in the target community.
- The CRA has provided an opportunity for members of the public to comment on the ABCA in a public meeting. Additional details regarding the public notification process are presented in a *Community Relations Plan* for the site.
- A pre-award public meeting was held to present the cleanup alternatives included in the Draft ABCA. Subsequent stakeholder meetings were held in 2020 where the cleanup was discussed and an opportunity was provided for comment.

A Brownfields Cleanup Decision Memo will be prepared at the end of the public comment process, which will describe the cleanup options selected for the site. The ABCA and the Decision Memo will be included with the Administrative Record. The Administrative Record repository is available on the CRA website (<u>http://camdenredevelopment.org</u>).

The expected outcome of the project is Unrestricted Use.



1.1 Site Description and Previous Uses

The 3.9 acre property was originally developed in the early 1920's as a hospital for contagious diseases. In the 1950's the facility was transformed into the South Jersey Medical Research Foundation Laboratory as the home for the Coriell Institute for Medical Research (CIMR). All buildings have been demolished and the site is a vacant property.

The site was purchased by Camden Laboratories, LP, in 1989 and then operated as a series of medical laboratories including "Viro-Med Biosafety" and "Quality Bio-tech" until at least 2007. The site was vacant after 2008. The buildings were demolished in 2018. The site currently consists of an asphalt driveway along the southern fence line. The remaining portions of the site consist of unpaved areas.

1.2 Surrounding Land Use

The surrounding area is predominantly residential with areas of industrial and commercial development to the east. In addition, the site is bounded to the east by the Dr. Charles E. Brimm Medical Arts High School and to the south and east by Whitman Park, including a recreational playground and ballfield.

1.3 Project Goal (Reuse Plan)

The redevelopment of the property will be for open public space and recreational ballfields. Prior to redevelopment, the site must be remediated to make it fit for reuse. EPA grant funds will be used to address the remaining areas of concern, including remediating a portion of the site that has historical evidence of a mercury spill.

1.4 Summary of Environmental Conditions

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. 016718 and has been subject to multiple Site Investigations and Remedial Investigations under the oversight of the NJDEP since 1989. Most recently a Preliminary Assessment/Phase I Environmental Site Assessment, Quality Assurance Project Plan, and Remedial Investigation Workplan were completed in 2017. In 2018, the vacant buildings were demolished with the wastes properly disposed of off-site, after which a Remedial Investigation Report and Remedial Action Workplan were completed in 2019, followed by additional supplemental investigation in February 2020. In addition, the property will be cleared and grubbed, and disturbed areas of the site will have topsoil and seed placed as part of the site restoration.

According to historical records, prior to 2004, a mercury surface spill occurred which resulted in concentrations exceeding the NJDEP residential direct contact soil remediation standard (RDCSRS). In addition, mercury impacted soil above the Impact to Ground Water Site Remediation Standard (IGWSRS) has extended into the saturated zone. Delineated subsurface media shall be addressed by excavation and disposal, and/or installation of a cap and execution of a deed notice.



Based on historical reports, there was a septic system in the northeast corner of the site. During the February 5, 2018 investigation conducted by Woodard & Curran, no septic holding tank was discovered, however an abandoned 10-inch sewer line was identified. In addition, a 4-inch sewer line that appeared to discharge off-site and approximately 40 feet of piping associated with these was also identified. The piping and lines associated with the septic system were properly abandoned in accordance with local regulations, the Technical Requirements and appropriate guidance, regulations and practices in 2018.

On August 6, 2018, Enviroprobe installed three (3) ground water monitoring wells at the highest reported concentration of mercury in soils and in the suspected downgradient direction. Ground water samples were collected in August 2018 and again in October 2018. Ground water samples were submitted for mercury analysis and were found to be non-detect or reported at a concentration below the NJDEP GWQS. No further investigation of ground water was recommended and therefore the monitoring wells shall be properly abandoned in accordance with the Technical Requirements and appropriate guidance, regulations and practices. The mercury contaminated soil on the property is the only area to be addressed as per the site investigation and the remedial investigation performed at the site.

1.5 Physical Setting

The Site is located at approximately 22 feet above mean sea level (MSL), and local topography slopes southeast. Surface soil at the site is classified by the Natural Resource Conservation Service (NRCS) as *Urban land*. Urban land soils are soils whose surface is covered by pavement, concrete, buildings, and other structures underlain by disturbed and natural soil material.

The subject area falls within the Magothy Formation of the Coastal Plain Physiographic Province. The Magothy Formation consists of fine to course-grained white sand and quartz that weathers yellow-brown to orange-brown. The Formation is interbedded with grey clay or dark grey clay-silt near the top, muscovite and feldspar are minor components, and wood fragments occur in many clay layers.

Based on a review of historic boring logs, the shallow subsurface is generally characterized by silty sands and clay with groundwater encountered at approximately 15 feet below ground surface.

No surface water bodies are present on or adjacent to the Site. The closest water body is the Cooper River, which is located approximately 0.5-miles east of the site and the local topography slopes to the southeast. Based on local topography and historic environmental reports the assumed direction of shallow groundwater flow is to the southeast.

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):

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.

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:

- Capping of Sites Undergoing Remediation,
- Ground Water SI/RI/RA
- Soil SI/RI/RA

The reference remediation standards for soil will be NJDEP's 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 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 Licensed Site Remediation Professional (LSRP) to be retained for the site. 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 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)No action,Alternative No. 2)Targeted Remediation with Engineered Cap, and

Alternative No. 3) Site-wide Remediation.

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 - No Action

If no environmental cleanup remedy were performed at this site:

- The site would remain out of compliance with NJDEP's regulations;
- The intended reuse of the site as open space and ballfields would not be possible.

3.1.1 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.

3.1.2 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.

3.1.3 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.

3.1.4 Operation and Maintenance

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



3.1.5 Institutional Controls

As no action is taking place under this alternative, no institutional controls are proposed.

3.1.6 Cost

There would be no costs associated with this alternative.

3.2 Alternative No. 2 - Targeted Remediation with Engineered Cap

Under this alternative, the remedial action will include abandonment of the 3 monitoring wells, and removal and disposal of mercury-impacted soil. This would be followed by installation of permeable and impermeable caps as an Engineering Control, recording of a deed notice and groundwater classification exemption area (CEA) as Institutional Controls. This combination of remedies will prevent exposure to residual site contaminants. Further details of the remediation plan would include:

- Abandon/close three monitoring wells in accordance with regulations, including the NJDEP Monitoring Well Certifications, Well Permits, and Monitoring Well Records.
- An estimated 134 tons of mercury impacted soil will be removed and disposed of off-site.
- An engineered cap will be designed and installed to provide a barrier to the contaminants in site soils. Permeable materials would include imported clean soil or landscape material. A cap would be installed in areas where soil contaminants remain at concentrations above NJDEP non-residential soil remediation standards. The estimated extent of mercury contained soil is 1,200 SF, which would be the required cap area.
- Remove asphalt roadway and restore site with topsoil and seed.
- Water main replacement in accordance with City of Camden requirements (Approx. 40 LF).
- Excavated soils will be sampled and characterized in accordance with the requirements of the designated disposal facility. The tasks will also include post-excavation sampling and analysis, and the emplacement of clean backfill.
- 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 caps 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 indefinite duration groundwater 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.

3.2.1 Effectiveness

The Institutional and Engineering Controls approach does not physically remove all 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 cap and CEA will significantly reduce the potential of human exposure.
- Providing notice of site environmental conditions to future site owners, occupants, and the general public by means of the Deed Notice.

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

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

3.2.3 Implementability

Removal of mercury impacted soil is a conventional means of addressing this type of contaminant. Cap placement as a type of remedy is a widely used and accepted practice for remediating contaminated soils.

The City and/or its consultant will retain a contractor that is licensed, qualified, and OSHAcertified 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.

3.2.4 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; maintenance and repair of soil cap, reporting, maintenance agreement, a utility plan should future utilities or building be proposed at the Site, and fence maintenance (if applicable)



3.2.5 Institutional Controls

This alternative will require the following Institutional Controls:

- A Deed Notice is required because contaminants above the RDCSRS 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.

3.2.6 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) Conduct procurement process;
- 5) Procurement and testing of clean fill cap materials;
- 6) Closure and abandonment of 3 monitoring wells;
- 7) Removal of approximately 134 tons of mercury impacted soil;
- 8) Installation of engineered cap;
- 9) Site restoration, including vegetative cover;
- 10) Prepare Deed Notice;
- 11) Prepare Soil Remediation Permit;
- 12) Prepare Remedial Action Report and other regulatory reporting requirements;
- 13) Prepare Quality Assurance, and Health and Safety deliverables.
- 14) Prepare written Operation & Maintenance Plan

The estimated cost for this cleanup alternative is \$254,410.

3.3 Alternative No. 3 – Site-wide Remediation

Under this alternative, the remedial action will consist of the abandonment of the monitoring wells and remediation of all mercury impacted soil. Approximately 1,335 tons of impacted soils will be removed, disposed of off-site and replaced with clean fill. Groundwater



encountered during soil removal will be pumped from the excavation cavity to an onsite holding tank for characterization analysis and disposal off-site.

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.

3.3.1 Effectiveness

This alternative would be immediately effective by removal of the potential continuing contaminant sources associated with the mercury "hot spot". The remedial action should result in unrestricted use of the site.

3.3.2 Sustainability and Resilience

This approach compares favorably to Alternatives 1 and 2 in resilience metrics, such as the continuing protectiveness of the remedy in light of reasonably foreseeable changing climate conditions and allows for no restrictions on future land use. This alternative would be ideal in that there would be unrestricted use of the site. The site-wide remediation alternative compares unfavorably to Alternative 2 (described in Section 3.2) with regard to sustainability metrics. The approach would result in increased energy use, greenhouse gas emissions, and landfill disposal volume.

3.3.3 Implementability

This alternative is feasible and implementable. This approach will involve the work elements described in Section 3.2, with the exception of the emplacement of a clean soil cap, deed notice, and CEA, plus these additional elements:

- 1) Backfill of the all excavated areas with clean soil fill.
- 2) Groundwater encountered during soil removal will be pumped from the excavation cavity to an onsite holding tank for characterization analysis and disposal off-site.

3.3.4 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.

3.3.5 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 mercury impacted soil is the reason that a groundwater CEA is required under other scenarios, a CEA would not be required if the mercury impacted soil is removed from the site.

3.3.6 Cost

To implement this strategy, groundwater monitoring wells would be fully abandoned and a total of approximately 1,335 tons of soil would be excavated, disposed, and replaced with



clean fill. Total project costs for this alternative are estimated at \$479,380. The USEPA Cleanup Grant contribution would be \$200,000. The CRA would provide the remaining \$279,380 from other funding sources.

3.4 Preferred Alternative

The preferred alternative is Alternative No. 3 – Site Wide Remediation. Soil excavation is a proven methods, environmentally effective and productive for long term, community-wide use. Excavation equipment is readily available. Soil excavation allows for a complete remedy for mercury impacted soil. This remedy can be completed within the timeframe of the USEPA Brownfields Grant.



Attachment A Site Location Map





RF PRODUCTS, PHIL-MAR AND CAMDEN LABS CAMDEN, NEW JERSEY

ATTACHMENT B Summary of Public Comments and Responses



COURIER-POST

NOV 1 3 RECTO

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

Agency:

Client:

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

Acct No: CHL-087266

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Acct: CHL-087266

Order #	Advertisement/Description	# Col x # Lines	Rate Per Line	Cost
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		Affidavit of Publication Charge	1	\$30.00
		Tearsheet Charge	0	\$0.00
		Net Total Due:		47.16

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Date:

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TITLE: DATE:	TITLE: DATE:
CLAIMANT'S CERTIFICATION AND DECLARATION: I DO SOLEMNLY DECLARE AND CERTIFY UNDER THE PENALTIES OF THE LAW TH GOODS HAVE BEEN FURNISHED OR SERVICES HAVE BEEN RENDERED AS STATE PERSONS WITHIN THE KNOWLEDGE OF THIS CLAIMANT IN CONNECTION WITH TH AND THAT THE AMOUNT CHARGED IS A REASONABLE ONE.	
Date: 11/02/2017	Federal ID #: 061032273

Signature: Aand Rahmer Official Position: Clerk

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US Environmental Protection Agency Brownfields Grant Application

The City of Camden is applying for US Environmental Protection (EPA) Brownfields Agency Grants to assess and clean up sites in the City of Camden. In accordance with EPA's community notification policies, a com-munity meeting is being held to munity meeting is being held to discuss the grant applications and to solicit public comments on the applications and the pro-posed use of funds. The meeting will be held on Thursday No-vember 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 documents that are part of the applications, will be available for public review and comment in the CRA's office during nor-mal business hours. For more information on reviewing the grant proposals or the meeting, the 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.

Land Use & Brownfields Meeting July 8^{th} ,2020

Meeting Meetings

- I. Status of Current Projects and Tasks
 - **a.** Block 1, Lot 1: No update at this time, DEP is currently on furlough
 - **b.** Cramer Hill Waterfront Park: still on schedule for opening August, 2021
 - c. Community Gardens: No updates at this time
 - **d.** Camden Labs: Bid is currently out for remediation. Will go to CRA board for authorization of a contract for remediation in August. Remediation should be completed early winter.
 - All mercury and contaminated soil will be removed from the site
 - Whitman Park will expand into Camden Labs site
- II. New Tasks/Partner Roles & Responsibilities
 - a. QStar Technology FlashCAM Overview- Andrew Clarke
 - High Resolution Remote Surveillance. Please see this link for more details <u>https://www.qstartech.com/ultra-high-resolution-in-anyenvironment/</u>
 - The FlashCAM has the best resolution and range on the market for remote surveillance.
 - Provides unsurpassed prosecutable quality images and resolution.
 - ii. **Social Behavior Modification** for hotspots prone to negative behavior that is difficult and inefficient to police through more conventional means.
 - Technology stops and prevents remote issues such dumping, trespassing, vandalism, graffiti, theft, loitering, break ins, and smash and grabs.
 - Please see this link for more details <u>https://www.qstartech.com/proactive-deterrence-like-noother/</u>
 - Great still image quality, can very helpful for the "shaming campaign"
 - Can reduce maintenance cost, raise property values
 - ****Check out attachments for more information**

III. Working Group Challenges

- **a.** ATVs continue to pose a major challenge
 - ATV usage has increase during COVID-19
 - a. CCPD has confiscated a number of ATVs
 - i. <u>https://www.facebook.com/CamdenCountyPD/post</u> <u>s/2877023209055824</u>

IV. Upcoming Opportunities

Center for Aquatic Sciences Virtually Camden project

Next Meeting: September 9th

