Community Relations Plan

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

US Environmental Protection Agency Hazardous Substances Cleanup Grant Cooperative Agreement No. BF 96258700

Submitted by:

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

Prepared by:

BRS, Inc. P.O. Box 2293, Medford Lakes, NJ 08055 856-964-6456

August 2020

COMMUNITY RELATIONS PLAN

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US Environmental Protection Agency Brownfields Hazardous Substances Cleanup Grant Cooperative Agreement No. BF 96258700

Overview

The purpose of this Community Relations Plan (CRP) is to present the strategies that the Camden Redevelopment Agency (CRA) in Camden, New Jersey has employed to date and will employ going forward to facilitate communications with, and involvement of, the residents of Camden, City officials, local organizations, and other stakeholders during the process of environmental cleanup at the 1667 Davis Street (Camden Labs) site in Camden. The CRP is particularly aimed at the informational needs of City residents who are potentially directly affected by the proposed cleanup action and redevelopment of the property.

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

- 1. The Public Notification and Outreach regulations and guidance of the New Jersey Department of Environmental Protection (NJDEP), which provides regulatory oversight to the project, as found in N.J.A.C. 7:26E.
- 2. The Community Relations and Public Involvement requirements of the United States Environmental Protection Agency (EPA), which provides funding for the project via a brownfields cleanup grant.

The CRP is prepared in accordance with EPA guidance and the governing EPA Cooperative Agreement.

The CRA is primarily responsible for implementing community relations pertaining to the site.

Spokesperson and Information Repository

The spokesperson for this project is:

Olivette Simpson, Interim Executive Director Camden Redevelopment Agency 520 Market Street, Suite 1300 Camden, NJ 08102 (856) 757-7600 OlSimpso@ci.camden.nj.us The administrative record file/information repository is located at the offices of the CRA and will be available to review by appointment only during business hours. Ms. Simpson may be contacted at (856) 757-7600 or OlSimpso@ci.camden.nj.us to schedule review of the file. Files will also be available on the CRA website at http://camdenredevelopment.org.

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

- Community Relations Plan (CRP)
- Analysis of Brownfields Cleanup Alternatives
- Decision Document
- Documentation of Public Outreach
- Environmental Assessment Reports
- Remedial Action Workplan
- EPA Brownfields Cleanup Grant Application

Site Description and History

The 3.9 acre Camden Laboratories (Camden Labs) site was identified in the 2017 EPA Brownfield Area-Wide Plan (AWP) as a catalyst site with high potential for spurring neighborhood redevelopment. This plan identified a potential end use for the site as public open space to serve as an expansion of the adjacent Whitman Park. However, the site has significant contamination and safety issues to resolve in order to fulfill its promise as a much needed expansion of Whitman Park.

Originally developed in the early 1920's as the Hospital for Contagious Diseases, in the 1950's, the facility was transformed into the South Jersey Medical Research Foundation Laboratory. 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 has been vacant since 2008 and the City foreclosed and took ownership of the property in 2017.

From site investigations and limited environmental remediation activities conducted between 1989 and 2009, the site is known to be contaminated with mercury impacted soil, remnants from its history as a hospital and medical bio-tech facility. Approximately two-thirds of the site was covered by asphalt-paved parking areas and a vacant compound of institutional buildings of approximately 53,000 square feet, demolished in 2018. The vacant structures were in extremely poor condition, known to contain lead based paints and subject to vandalism and large amounts of illegal dumping - literally across Hallowell Lane and Decatur Street from residential neighbors.

Nature and Threats to Public Health and the Environment

The site is currently an active case with the New Jersey Department of Environmental Protection (NJDEP) Site Remediation Program (SRP) and has been subject to multiple Site Investigations and Remedial Investigations under the oversight of the NJDEP since 1989. Most recently a Remedial Investigation Report and Remedial Action Workplan were completed in 2019. In 2018, the vacant buildings were demolished with the wastes properly disposed of off-site.

Based on historical reports, there was a septic system in the northeast corner of the site. During a 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. Both the sanitary sewer and potable water utilities were properly closed in 2019 following building demolition. A section of water main within the right-of-way is required to be replaced to comply with City regulations. This will take place during the remediation of the site, and prior to final 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.

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.

Based on the results of the 2018 soil investigation and development of the AOC-specific IGWSRS, the estimated volume of mercury-impacted soils was 4,000 cubic yards, and the subsequent supplemental investigation completed in February 2020 was able to reduce this volume to approximately 890 cubic yards.

The primary mechanisms for potential transport of these contaminants is through direct contact with contaminated soil and through transport to groundwater. Following work to address the remaining area of concern of the historic evidence of the surface mercury spill, the remaining asphalt driveway will be removed and the disturbed areas of the site will have topsoil and seed placed as part of the site restoration.

Community Profile

The target area is a 3.9 acre property known as the former Camden Laboratories site (Camden Labs). Located in the Mt. Ephraim neighborhood of Camden, New Jersey, the site is on the southeast side of the community, near the Cooper River. The Mt. Ephraim neighborhood consists of a local commercial corridor, Mt. Ephraim Avenue, surrounded by diverse residential areas that also contain a variety of institutional uses, such as hospitals, schools and churches.

The area also contains many vacant and blighted brownfield sites, owing to commercial and industrial uses historically located in the community. In addition to Camden Labs, across the street to the east is the Phil-Mar site (4.1 acres), identified as the second catalyst site for the neighborhood

in the AWP process. This site is also abandoned, in extremely poor condition and subject to vandalism, illegal dumping and various other criminal activities. Given their substantial size, together, they represent impediments to the advancement of community revitalization efforts.

Camden Labs has been identified as a catalyst brownfield site by the 2017 EPA Area-Wide Plan due to its size and location in the neighborhood. Its potential as a catalyst site is enhanced by being surrounded by a predominantly residential area and within walking distance of the Ferry Avenue PATCO high speed commuter rail station.

More significantly, Camden Labs, shares the block with the community's Whitman Park. The City plans to redevelop the Camden Labs site as an expansion of Whiman Park with public open space and recreational ballfields. However, prior to redevelopment, the City must remediate the property 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. Remediation of the site will remove the potential of contaminant sources associated with the mercury "hot spot". The remedial action should result in unrestricted use of the site and allow for redevelopment of the property in support of Whitman Park.

Chronology of Community Involvement

The US EPA brownfield cleanup grant proposal, which describes existing conditions, community impact and proposed solutions, was developed in an open manner with input and involvement of community groups. The following were ways in which the EPA Brownfield Cleanup grant process, as it pertains to this site, was made available to the public:

- Community Meeting on November 9, 2017 at the Camden City Hall office to discuss the grant proposal and solicit public comments;
- Announcements describing the application and inviting public comment were placed in the Courier -Post (November 13, 2017);
- Draft application and draft Analysis of Brownfield Cleanup Alternatives were available for public review and comment;
- Monthly Camden Collaborative Initiative (CCI) Land Use and Brownfields meeting with the NJDEP held on July 8, 2020 to discuss remediation;
- Fact sheets about the grant will be distributed to various interested community groups prior to start of remediation.

Further, prior to remediation construction, specific community notification is required. The LSRP of record (Woodward & Curran) will ensure compliance with NJDEP public notification requirements. Signs will be erected at the site to notify the public of the environmental work in progress on the site and provide contact information for responsible agencies in the event that any issues or questions arise regarding the work.

As part of the public involvement, the CRA and their consultant (BRS, Inc.), also identified those sensitive populations around the site, and will provide public notification (both English and

Spanish language signage) regarding the cleanup activities to all sensitive populations, owners, and tenants within 200 feet of the site through distribution of flyers and neighborhood signage. Flyers were distributed prior to demolition in 2018, and will be redistributed prior to the start of cleanup activities to neighboring properties. Signs will be posted prior to remediation to ensure compliance with EPA public notification requirements.

By preparing and implementing this Community Relations Plan, the CRA has also ensured compliance with EPA's Public Involvement requirements.

Key Community Concerns

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

To ensure that no adverse environmental impact occurs during cleanup activities, the remediation contractor will prepare a Health and Safety Plan; a transportation plan ensuring that truck traffic is not routed through residential areas; and an air monitoring plan to ensure that dust does not migrate off site.

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

Benefits to Targeted Community

Once the site has been remediated, there will be a direct impact on reducing potential risks to public health and the environment. Removing or containing contaminants in this densely populated residential section of Camden will immediately decrease the threat of potential future hazards to public health and the environment. The EPA grant will be targeted toward ensuring that this work is conducted appropriately, by funding the required remediation to enable redevelopment. This grant will also facilitate the development of usable open space in this densely populated neighborhood and allow for an expansion of the existing Whitman Park.

Continued Community Involvement

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

The CRA will maintain the administrative record file to reflect the status of the cleanup, public comments, response to public comments, and other significant decisions regarding environmental remediation.

Attachment 1. Site Layout

Attachment 2. Public Notification

COURIER-POST

NOV 1 3 RECT

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 PUBLICNOTICEUSENVIRONMENTALPROTECTION AGENCYRROWNEIELDSGRANTAPPLICATIONTHEC	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.	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.0. #
SIGNATURE:	SIGNATURE:
TITLE: DATE:	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

Personally appeared

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, deposeth 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:

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Public Notice

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 community 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 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 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, 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)

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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.